

**From:** [Jeffrey Delapena](#)  
**To:** [Eric Golemo](#)  
**Cc:** [Bart Catching](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Subject:** RE: Public Comment- Land Use Alternatives for the DEIS  
**Date:** Wednesday, November 6, 2024 4:07:00 PM

---

Good day, Eric,

Thank you very much for submitting testimony for consideration in the Land Use Alternatives to be studied in the DEIS.

I have forwarded to additional Staff, and these comments will be entered into the Comprehensive Plan Index of Record.

Regards,  
Jeff Delapena

---

**From:** Eric Golemo <egolemo@sgaengineering.com>  
**Sent:** Wednesday, November 6, 2024 3:59 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; karl\_j\_us@yahoo.com; jkbaker76@gmail.com; mbergthold@aol.com; Bryan@HalbertConstruction.com; jack@jackharrounconstruction.com; stevem@landerholm.com; wogen5@msn.com  
**Subject:** Public Comment- Land Use Alternatives for the DEIS

**EXTERNAL:** This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Planning Commission,

I plan to testify at the hearing on 11/7/24. But I also wanted to include a written outline of my testimony for the record incase I do not have time to finish in the allotted time or am unable to attend.

First, I think staff did a good job of complying with the state requirements of HB1220. But even county staff and several cities' representatives have stated that the plan is not practical without significant subsidies. Approximately 50% of the housing planned in this proposal will be for below 80% of AMI and is not economically feasible to construct. Staff has stated that they only need to plan for the growth, not insure it is practical or possible to achieve. So, instead of actually planning for our growth, this is merely an accounting exercise! This is too big of a decision with significant consequences to not plan! If the planned housing is not practical to achieve, the land will not convert and will become shadow inventory in the model. This will contribute to an even bigger shortage of housing further driving up the cost of the

existing stock doing the exact opposite of what is intended.

Secondly, this plan is not recommending any expansion of the Urban Growth Boundary to accommodate housing for our growing population and is instead advocating for increasing the density in the current boundary. This however doesn't provide a variety of housing types. Additional Single-family owner-occupied homes is missing from this plan. Instead, we are meeting most of our future housing needs with high density apartments. This forces our community into being tenants and puts the dream of homeownership out of reach for 1000's of Clark County citizens. This broadens the gap between the "haves" and the "have nots" and eliminates the opportunities for equity, associated appreciation, and generational wealth. This is especially the case for marginalized communities. While Millionaires and Billionaires get richer renting us apartments, our citizens are priced out of an already thin pool of owner-occupied homes! Furthermore, we will attract what we plan for. While Clark county used to attract the best and brightest from the metro area, we will now be a hub for low income and subsidized housing if it comes to fruition. Without housing stock, it will be difficult to attract quality employers. We also need to provide move-up housing opportunities and increase supply to make existing stock more obtainable.

We need to not only consider complying with state bills but also need to have a plan that maintains the quality of life and character of our community. We need a fundamental change in vision and philosophy from the decision makers giving staff different direction and guidance. We need to give future generations a chance at finding a piece of the American Dream here in Clark County. **We need to have an additional alternative that includes some targeted expansion of the Urban Growth Boundary!** At a minimum, we need to include it as an additional alternative in the DEIS to allow for the opportunity to consider it as the plan progresses.

Finally, I want to avoid reiterating what has already been said. I also support the recommendations and testimony from NW Partners Group which includes:

1. Including all Site-Specific Requests
2. Broadening Land Use Alternatives
3. Conducting a Comprehensive Analysis of Resource Lands

Thanks for the consideration. To conclude, **I urge you not to recommend Alternative 1 or 2, and instead look at an additional alternative that includes a more balanced approach considering adding land to the UGA instead of just increasing density.** We need to protect our quality of life and the character of our community while also adequately planning for our future growth.

Sincerely,  
Eric

Eric E. Golemo, PE  
Owner / Director of Engineering and Planning  
**SGA Engineering, PLLC**  
Civil Engineering / Land Use Planning  
Development Services / Landscape Architecture  
2005 Broadway, Vancouver WA 98663  
Phone: (360)993-0911  
Fax: (360)993-0912  
Mbl: (360)903-1056  
Email: [EGolemo@sgaengineering.com](mailto:EGolemo@sgaengineering.com)