

From: [Oliver Orjiako](#)
To: [Jeffrey Delapena](#)
Subject: FW: NW Partners Public Comment - Land Use Alternatives DEIS
Date: Friday, December 6, 2024 8:20:07 AM
Attachments: [image001.png](#)
[NWPartners_Comp_Plan_Land_Use_AlternativesCountyCouncil-12-05-24FINAL.docx](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

FYI and for the record. Thanks.



OLIVER ORJIAKO
Director
COMMUNITY PLANNING

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From: Noelle Lovern <Noelle@biaofclarkcounty.org>
Sent: Thursday, December 5, 2024 4:40 PM
To: Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: shorenstein@schwabe.com
Subject: NW Partners Public Comment - Land Use Alternatives DEIS

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Greetings, County Council and staff.

We are grateful for the opportunity to provide comment for the record regarding the Land Use Alternative/DEIS. We have two main urgings for this body:

1. Include all site-specific requests in the Land Use Alternatives to be studied in DEIS.
2. Commission a comprehensive countywide agricultural and forest land analysis pursuant to WAC 365-190-050 and 365-190-060.

Please see our attached comment.

Best,

Noelle Lovern | Government Affairs Director
BIA of Clark County - a Top 30 NAHB Association
Protecting and promoting the building industry.

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Chair Gary Medvigy
County Council
PO Box 5000
Vancouver, WA 98666-5000

December 5, 2024

Re: Clark County Comprehensive Plan Land Use Alternatives

Dear Chair Medvigy, County Councilmembers, and Staff,

NW Partners Comprehensive Plan Taskforce is a coalition of businesses, organizations, and community leaders that align with hundreds of employers and residents of Clark County. We are committed to developing a Comprehensive Plan Update to ensure the County remains a wonderful place to live, work, and play. In this comment we urge the Clark County Planning Commission to give due consideration to the following:

- 1) Including all site-specific requests in the Land Use Alternatives to be studied in DEIS.
- 2) Commission a comprehensive countywide agricultural and forest land analysis pursuant to WAC 365-190-050 and 365-190-060.

Including Site Specific Requests

Clark County asked the public to submit their site specific requests for consideration in the upcoming DEIS (notice of January 21, 2024). It is important for Clark County to comply with the notice. We urge County Council to request that staff address all residents' specific requests and include each relevant site-specific request in the Vancouver UGA DEIS alternatives map. This action will ensure that the County Council has a broader set of solutions to consider for the plan update. Failing to do so would prevent these properties from receiving fair consideration, in clear violation of the County's obligations under state law and basic fairness principles. To deny that review at his time will further disrupt the regular cycle and ultimately disadvantage the landowners making the requests.

Conducting a comprehensive countywide analysis

State law requires that Clark County follow specific guidelines for managing farmland and forestland. These guidelines, set by the Department of Commerce, say that counties need to do

a full countywide review of natural resources lands. This means they can't just look at one piece of land at a specific point in time but must consider the whole county.

In the case of designating agricultural land in urban areas, for example, counties are also supposed to have a program to allow the transfer or purchase of development rights. For both agricultural and forestlands, changes in designation should be based on things like public policy updates, changes in the area, or new information.

This review isn't optional. The County is required to review and, if needed, update its policies to better manage resource lands. To make these updates correctly, the County must conduct a countywide study during this comprehensive update process.

Closing

In closing, community engagement is a critical requirement of the Comprehensive Planning process. Our coalition appreciates the presentation provided by Clark County Community Planning at the Building Industry Association of Clark County on October 29, 2024. It was an important opportunity to review the position of Clark County Community Planning staff regarding the land use alternatives which are under consideration at this time.

While the presentation is an important step in community engagement, we believe the feedback loop needs drastic improvement. The mere purpose of community engagement is to shape and mold the plan to reflect the needs and preferences of our community. To disregard the feedback of community stakeholders, especially when the development of the plan will be their responsibility and will impact their quality of life, is woefully shortsighted.

This Taskforce respectfully urges the Clark County Council to pursue these actions for the DEIS:

- 1) Include all site-specific requests in the Land Use Alternatives to be studied in DEIS.
- 2) Commission a comprehensive countywide agricultural and forest land analysis pursuant to WAC 365-190-050 and 365-190-060.

Thank you for your consideration,

NW Partners Comprehensive Plan Taskforce