

**From:** [Jeffrey Delapena](#)  
**To:** [Eric Golemo](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Jose Alvarez](#); [Oliver Orjiako](#); [Jenna Kay](#)  
**Subject:** RE: Public Comment- Land Use Alternatives DEIS for the 2025 Clark County Comprehensive Plan  
**Date:** Friday, November 21, 2025 1:34:34 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Eric,

Thank you for this feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded your comments to Staff and will enter these into the Index of Record.



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**From:** Eric Golemo <[egolemo@sgaengineering.com](mailto:egolemo@sgaengineering.com)>  
**Sent:** Friday, November 21, 2025 12:28 PM  
**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>  
**Subject:** Public Comment- Land Use Alternatives DEIS for the 2025 Clark County Comprehensive Plan

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County Council, Planning Commission, and Staff,

I am providing the following comment on the DEIS for the 2025 Clark County Comprehensive Plan. This is an extremely important decision that will shape our community for years to come! **Of the proposed alternatives, I support Alternative 3.** That said, even Alt 3 falls short for our future growth, and some targeted expansion of the Urban Growth Boundary is necessary to adequately address the housing shortage and affordability crisis!

Washington State faces a severe housing affordability crisis. The Department of Commerce projects a need for [more than 1.1 million more homes to be built in the next 20 years](#). Currently, [approximately 80% of Washington households cannot afford the median-priced family home](#). The Columbian just reported that [half of Southwest Washington residents cannot even afford housing at all](#). We are facing a significant undersupply of housing and a lack of buildable land.

GMA and the Urban Growth Boundary significantly limits where we can build new housing and has artificially and dramatically driven up the cost of homes in Washington. Better planning could help more families enjoy the benefits of home ownership. We need a fundamental change in vision and philosophy to protect our quality of life and the character of our community while also planning for our future growth.

The presented alternatives do a good job of complying with the state requirements of [HB1220](#) (which requires local governments to plan for and accommodate housing needs across all income levels). But that compliance alone is not practical without considering all tools and options. The chosen approach significantly impacts the character of our community. County staff and several cities' representatives have stated that the plan is not practical without significant subsidies. Approximately 50% of the housing planned is targeted to those below 80% of AMI and is not economically feasible to construct. Staff has stated that they only need to plan for the growth, not ensure 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 adequately 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.

It should be noted that none of the alternatives being considered are recommending any significant expansion of the Urban Growth Boundary to accommodate housing for our growing population. Instead, they rely on increasing the density in the current boundary. Increasing density alone will not solve the affordability issue. It is part of the solution, but we also need an increase in land supply. We need more supply in all market segments.

Urban Infill and Redevelopment is more expensive than traditional green field development. While there is potentially less infrastructure cost, the existing land value and demolition

significantly increases the price and there is not the same economy of scale with these smaller conversions. It also happens slowly compared to new development. Properties convert to higher uses gradually and this will not address the immediate need.

Additional land for Single-family, owner-occupied homes is missing from this plan. Much of what is left is being upzoned. 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! Over time owning is more affordable than renting. 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 risk becoming a hub for low income and subsidized housing. 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 housing stock more obtainable.

We need to not only consider complying with state bills but also ensure we have a plan that maintains the quality of life and character of our community. We need to give future generations a chance at finding a piece of the American Dream here in Clark County.

**Alternative 3 is the best of the options presented. But as soon as this plan passes, we will be in a structural deficit of economically feasible housing to meet the community's growth. Prices will have to rise to make them economically feasible. Without additional supply we will not be making housing more affordable, we will just be getting less for the same price. To really address affordability, we need to consider solutions that include some targeted expansion of the Urban Growth Boundary and significantly increasing the supply of economically feasible buildable land.** In addition, we need to consider rezoning some uneconomically viable agricultural land adjacent or surrounded by urban development to more efficiently utilize the land. Thanks for the consideration.

Sincerely,  
Eric

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