

**From:** [Jeffrey Delapena](#)  
**To:** [Jocelyn Cross](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** FW: Response Letter to the DEIS  
**Date:** Tuesday, November 25, 2025 3:17:48 PM  
**Attachments:** [UGB Response Letter 11-25-2025.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Jocelyn,

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

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



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** Jocelyn Cross <[jocelync@hurleydev.com](mailto:jocelync@hurleydev.com)>  
**Sent:** Tuesday, November 25, 2025 3:10 PM  
**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>  
**Subject:** Response Letter to the DEIS

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attachments unless you recognize the sender and know the content is safe.

Good Afternoon,

Please find attached the response letter regarding the Draft Environmental Impact Statement for the Comprehensive Growth Management Plan.

**Best Regards,**



**Jocelyn Cross**

Sr. Development Manager

**Hurley Development LLC**

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November 25, 2025

RE: 2025 Comprehensive Plan Update and Draft Environmental Impact Statement (DEIS)

Dear Chair Marshall, and Members of the Clark County Council,

Thank you for the opportunity to comment on the 2025 Comprehensive Plan Update and the Draft Environmental Impact Statement (DEIS). Hurley Development is an active land developer in Clark County with a long track record of bringing residential and retail communities to market. Because we work directly with the realities of land supply, engineering feasibility, and market absorption, we view this comprehensive plan decision as one of the most significant housing and economic decisions the county will make for the coming generation.

The DEIS outlines a projected need for 103,695 new housing units to accommodate nearly 191,000 additional residents by 2045. Clark County is already underproducing housing relative to this demand. The result is reflected in the county's own data: the median home price has climbed from \$403,700 in 2020 to \$568,600 in 2024. When demand continues to rise and land supply remains constrained, higher pricing is the predictable outcome, and home ownership is negatively affected.

The DEIS also highlights that over half of all required new units must serve households at or below 80 percent of the area median income. Many studies show that homeownership remains the preferred choice for most Americans, including most renters. Research consistently demonstrates that people associate owning a home with long term stability, the ability to build equity, and meaningful involvement in their community. When the market produces primarily rental options, without creating diverse pathways to home ownership, communities experience higher turnover, fewer long-term stakeholders, and reduced investment in neighborhood schools, organizations, and local decision-making. Expanding opportunities for attainable homeownership is not just a housing objective; it is a direct investment in community strength and long-term stability.

Meeting this target requires a reliable supply of buildable land. The Vacant Buildable Lands Model assumes a level of redevelopment that has almost no precedent. The Model assumes that



70 percent of underused residential parcels will be redeveloped in the next 20 years, but this does not line up with what we see on actual projects. Redevelopment is expensive, demolition now requires stormwater permitting, and the added costs push the final home prices above what buyers are willing to pay when similar homes on vacant land or existing housing stock are more affordable. Because of this, developers choose vacant land when it is available. This gap between what the model assumes and what is realistically buildable and what the market can bear for pricing, makes it highly unlikely the county will meet the housing numbers in the plan.

We also believe it is important to address one technical point not covered in the DEIS. The soil analysis in the environmental review covers what is required, but water rights were not evaluated. Most produce resellers will not accept crops grown through non-irrigated farming, which makes commercial production unrealistic without water rights. Productive agricultural land is defined not only by soil classifications but by legally available water. Clark County includes many areas with high-quality soil but no associated water rights, no irrigation access, and no path to obtaining irrigation rights under current state rules. In those areas, the presence of “prime” or “good” soils alone does not translate into viable farming. Planning that assumes these soils remain in long-term agricultural production without considering water rights overstates the actual agricultural capacity and value of the land. Without water rights, the land is not realistically farmable, regardless of its soil type. The result of this planning would be land that will sit idle because relatively small acreages without irrigation cannot generate the crop yields needed to even cover the cost of production. This should be acknowledged in weighing whether these areas are truly agricultural resources or whether they are better suited to meeting documented housing needs.

We recognize and support the intent of the Growth Management Act to prevent sprawl and preserve meaningful agricultural lands. However, based on the county’s own demand projections, the No Action Alternative will not meet the required capacity. Alternatives 2 and 3 acknowledge this by introducing UGA expansions. Of these, **Alternative 3 is the only option that provides sufficient flexibility and the closest alignment with realistic land absorption, redevelopment trends, and the county’s long-term housing needs.**

UGA expansion in strategic locations is not sprawl. It is a practical response to the county’s projected population growth, the infeasibility of relying on high-density redevelopment alone, and the economic requirement to keep homeownership attainable. Clark County’s future job



growth is also tied to housing availability. Employers consistently cite the cost and supply of housing as a key factor in workforce retention and relocation decisions. A constrained housing market ultimately harms both residents and the local economy and will affect the county for decades to come.

**For these reasons, we encourage the council to adopt Alternative 3 as the preferred land use alternative.** Alternative 3 provides jurisdictions with room to meet their housing targets, adjusts for the limitations of redevelopment and constrained lands, and supports a balanced approach to growth that reflects the realities of delivering housing in Clark County.

Thank you for your consideration and for your work on this process. We welcome further opportunities to contribute technical and market-based insight as the update moves forward.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ryan Hurley', is written over a horizontal line. The signature is fluid and somewhat abstract, with a long, sweeping underline that extends to the right.

Ryan Hurley  
President and Owner  
**Hurley Development LLC**