

From: [Jeffrey Delapena](#)
To: [Walter Valenta](#); [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#)
Cc: [Doug Kolberg](#); [Jose Alvarez](#)
Subject: FW: Comment on the Clark County Comprehensive Plan
Date: Monday, December 1, 2025 9:27:36 AM
Attachments: [Clark County No Gaps Letter.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Walter,

Thank you for your feedback related to the 2025 Comprehensive Plan Update.

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



Jeff Delapena
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From: Walter Valenta <waltervalenta@gmail.com>
Sent: Friday, November 28, 2025 12:38 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: Doug Kolberg <dougkolberg@yahoo.com>
Subject: Comment on the Clark County Comprehensive Plan

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Dear Director Orjiako,

Please accept his comment on the Clark County Comprehensive Plan Update.

Thank You,

Doug Kolberg

November 25, 2025

Comment on Updated Comprehensive Growth Management Plans of Clark County

Oliver Orjiako,
 Director Community Planning
 oliver.orjiako@clark.wa.gov

Please accept this comment on the proposed Zoning Code for the Updated Clark County Comprehensive Growth Management Plan.

The proposed Clark County Comprehensive Plan Code Language proposes the following Minimum and Maximum unit density allowances for the Medium and High Density Zones. However, the draft proposal leaves a gap in the available Units per acre that are allowed.

Urban Residential Districts in Current Draft Code		
Urban Medium Density R-24 <i>Allows 18-24 Units</i>	Urban Medium Density R-36 <i>Allows 24-36 Units/Acre</i>	Urban High Density R-50 <i>Allows 40-50 Units/Acre</i>
units	18 19 20 21 22 23 24	
per	24 25 26 27 28 29 30 31 32 33 34 35 36	
Acre		Gap? 40 41 42 43 44 45 46 47 48 49 50

We propose the Zoning Code Language and Charts be changed to remove the gap in allowable unit per acre as shown in the following chart.

Urban Residential Districts - Suggested Code		
Urban Medium Density R-24 <i>Allows 18-24 Units</i>	Urban Medium Density R-36 <i>Allows 24-36 Units/Acre</i>	Urban High Density R-50 <i>Allows 36-50 Units/Acre</i>
units	18 19 20 21 22 23 24	No Gap
per	24 25 26 27 28 29 30 31 32 33 34 35 36	
Acre		36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

Closing the unit gap stills maintains the possible total number of units provided in the R-50 zone. A minimum of 36 units in the R-50 zone would provide more flexibility for individuals developing their land. This flexibility is necessary sometimes to meet other requirements of development, such as transportation access constraints, lender financing policies, and market demand.

Thank you,

Doug Kolberg
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