

From: [Jeffrey Delapena](#)
To: [Chuck Houghten](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Comments on Draft Clark Co CGMP
Date: Monday, December 1, 2025 11:32:24 AM
Attachments: [Houghten Comments on Draft Clark Co CGMP.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Chuck,

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
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COMMUNITY PLANNING

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From: Chuck Houghten <cjhoughten@gmail.com>
Sent: Sunday, November 30, 2025 2:31 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comments on Draft Clark Co CGMP

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Hello - Please find my comments attached herein

Thanks

Chuck Houghten
3608523470

Charles Houghten
16909 NE 227th Ave
Brush Prairie, WA 98606

November 29, 2025

Clark County Community Planning
Comp Plan Comments
P.O. Box 9810
Vancouver WA 98666

To the Clark County Washington Planning Commission, Department Staff and the County Council – Thank you for the opportunity to review and provide comments on the current draft Comprehensive Growth Management Plan and EIS. I appreciated the opportunity to visit with staff, attend both in person and on-line meetings and informational sessions as I attempted to learn more about the planning process and the alternatives that are being considered.

Summary of my comments on the selection of a preferred alternative:

I generally support Alternative 2 as the County's Preferred Alternative for helping to direct and manage the future growth, maintenance and improvement of the County and Cities therein. I believe that very limited expansion of the UGAs of the County is necessary, and the overall goal should be to target expanding growth within the current Urban Boundaries and some of the designated growth areas. This must be accompanied by the avoidance and reduction of negative impacts to natural areas, important agricultural lands and the overall quality of life in Clark County. I agree with Alternative 2 in part due to the draft documents analysis that concludes that too much increased density within existing Urban areas will also cause adverse impacts to existing parks and other natural areas and resources. I do not support selection of Alternative 3 for any reason. It is simply too broad of approval for many agricultural lands and other sensitive lands to be considered for conversion to development. Allowing blanket

approval of the numerous individual land zones changes without more site-specific analysis seems inappropriate.

In selection the preferred alternative for directing the growth of Clark County, I encourage the decision makers to focus on the quality of life that currently exists in our communities and that maintenance and improvement of those values is paramount to our success.

General Comments on the Planning Documents and Process

In many ways I wish that the Planning process and documents were able to be more simply conveyed for the convenience of more members of our community to get involved and easily understand it. They and their families will be affected by the actions and decisions being made here and those that follow in subsequent actions.

There are many things that I find missing from what I would expect in a Planning Document, along with its EIS analysis. These include things like:

- Vision Statement(s) - where do we want and expect the County and its individual communities and the overall environment to look like, live and work in 100 years or more – not just the 10 – 20-year planning horizon.
- Goals – broad statements of where we expect to be in the future for key functions and features including Housing, Transportation, Schools, Parks and Recreation Areas and land units such as Agricultural, Wetland and Riparian Lands, Forest Lands along with Building Zones.
- Objectives – more specific statements of actions to accomplish our Goals – such as acreage of parks, types and capacities of housing, commercial and manufacturing etc., miles roads (by type/need), hiking/biking trails, sewer and water lines, etc.

I see reference to some of these in the planning and other documents – it would be good to either present these or provide clear links to them. A diagram showing the overall Process stemming to and from the GMP would be helpful. From Planning to Zoning and the laws, policies and procedures that connect these things to actions on the ground.

I would be interested to know of what's the vision for Clark County's "Build-out" - i.e. what's the viewed carrying capacity of population to live in the County and Cities and sustain a healthy quality of life (obviously a value – which varies among individuals – but still a value that can be determined by today's citizenry). And could one assume that there could be a vision – or even a plan – for the eventual Incorporation of the Hazel Dell and Salmon Creek areas into the City of Vancouver? I believe it would be a mistake to incorporate the area into a new city. And certainly, City Incorporation should not equate to development.

Some Specific Comments on the Document:

Maps in the document are typically inadequate at the scale provided. Readers and users should be encouraged to use your online mapping tool – which is available and works very well for some map themes but not all. The Storybook maps for the Alternatives were very useful.

Maps should be listed in the Table of Contents

Table 42 in Section 3.5 would be much more helpful with an accompanying map and at least some general acreage figures.

Where are maps/documentation of all the "down-zoning" that has occurred throughout the County – particularly in the R5 Zones? Such maps will show the "True" zoning that currently exists.

Online Maps could be improved with a floating legend. Some legends are too complicated with colors alone.

Some Specific Comments on the Alternatives and Environmental Impact Statement

In Section 3.5 B. Table 43 displays Threatened and Endangered Species that occur or likely occur within Clark County, and Table 44 lists the Plants in Clark County that are on the Washington list of Species of Conservation Concern, however, you don't appear to list many of the Wildlife species on the Washington State Species of Conservation Concern that do or may likely occur here – including:

Streaked Horned Lark

Slender-Billed White Breasted Nuthatch

Peregrine Falcon

Golden Eagle

Bald Eagle

White Pelican

Western Gray Squirrel

Brush Prairie Pocket Gopher

The County should have goals and objectives to protect, enhance and restore wetlands and riparian areas, and not allow under most circumstances for wetlands and riparian to be included in development plans.

The County should have goals and objectives to promote and protect agricultural lands within the County to be sustained for the long-term benefit of the local community.

The County should have goals and objectives to minimize the loss of additional Forest lands within the County and to encourage reforestation in appropriate areas.

The County should expand the Scenic Resources analysis to include the adoption of more policies for the protection of the scenic resources of the County and consider ideas for Viewshed Protection and Visual Quality Assessments for proposed developments.

There are many good statements within the Draft Documents "Mitigation Measures" sections – how will these be adopted into the plans and implemented?

Parks and Recreation areas and facilities within the County seem inadequate and will certainly be inadequate with more population growth. More specific planning must be done. Again, good ideas under Mitigation – but, where's the Plan?

Local Area Concerns:

I am generally opposed to the expansions of the UGA and zoning changes in Alternative 3. Specifically, I will point out a couple areas in my vicinity that I am very much opposed to.

First it was shocking to me that the area along 162nd Street, south of Fourth Plain and the Safeway shopping center, which was primarily a wetland, was re-zoned for Industrial/Warehouse use. Little to no wetland protection is planned for the area from what I can see. Now the areas nearby, including some of which is wetland habitat across the street are also requesting zone changes from Agriculture to R-40. I am strongly opposed to such a high-density proposal for the area. The warehouses built in the area exhibit a sad example of poor planning and design. The traffic in the area is already getting bad and now adding truck traffic in the mix – and perhaps now apartments?? Such a design is sure to turn an area into low desirability from multiple standpoints. Let's not follow examples like this elsewhere in Clark County and Vancouver. It appears little consideration for traffic flow or quality of life was considered in the area's plans.

Likewise, there are multiple proposals along Ward Road near 172nd that also propose to be changed from Agricultural zone to residential. Again, some of these lands are wetlands and should be protected.

I can generally support a proposal for single family homes R1-5 where there is no agricultural value, no impacts on important natural resources, and it is already attached to developed properties.

I generally agree with the new State directions to Cities to focus on development infilling within the existing developed area. This may include small scale neighborhood redevelopment projects where appropriate. However, I do not support disruption of the existing neighborhood type and loss of quality of life where single family neighborhoods are seeing multi-family housing units popping up within the neighborhood. I would think less often and only by design and clear assessment of potential impacts and benefits should single family neighborhoods undergo sporadic infiltration.

Conclusions

Clark County faces big challenges ahead. We are blessed with a beautiful and productive area. The beauty and bounty of the Columbia River, our nearby Cascade Mountain and Foothill Forests and our semi-buildable and functional lowlands all contribute to attracting more new citizens and visitors. The challenges require smart Planning and Design. Developers here have done some great work – but we can't let development rule. The quality of life that protects and enhances our natural resources here will be key. The County must avoid over-crowding at the same time it must avoid too much growth and community sprawl into sensitive areas. The County should identify more clearly where the highest densities of population will be located and what amenities those communities will need. Parks, open/green space, and recreational areas will be important along with general services. Likewise, where will restrictive zoning not change or be strengthened to protect important agricultural and natural resources, wildlife habitats including wetlands and riparian areas as well as other scenic and aesthetic values of the community.

Thank you for the opportunity to participate in this important process.