

From: [Oliver Orjiako](#)
To: [Jeffrey Delapena](#)
Subject: FW: Memo to BOCC re Comprehensive Plan Update
Date: Tuesday, January 6, 2026 2:33:27 PM
Attachments: [image001.png](#)
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[2026-01-06 Memo to BOCC re Comprehensive Plan Update Clean.pdf](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

FYI. Thanks.



OLIVER ORJIAKO
Director
COMMUNITY PLANNING

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From: Horenstein, Stephen W. <SHorenstein@schwabe.com>
Sent: Tuesday, January 6, 2026 1:35 PM
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Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>;
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Subject: Memo to BOCC re Comprehensive Plan Update

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Good Afternoon, Councilors,

Attached you will find a memo submitted for the overall record and the January 8th hearing on the comprehensive plan.

Please let me know if you have questions. I can be reached at my email above or at 360

921 4744.

Best...Steve

Stephen Horenstein

—

Shareholder

D: (360) 597-0806

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Memorandum

VIA EMAIL

To: Board of County Councilors

From: Stephen W. Horenstein for Clients and Northwest Partners for a Stronger Community

cc: Oliver Orjiako, Jose Alvarez, Christine Cook

Date: January 6, 2026

Subject: Clark County Comprehensive Plan Update

<https://clark.wa.gov/sites/default/files/media/document/2025-12/2026-0108-preferred-alternative-selection-table-final.pdf>

We have reviewed the information posted for the January 8th public hearing on the comprehensive plan update. We have attached the portion of those materials that describes in general terms what staff is proposing as the final alternative for the comprehensive plans of Clark County (the “County”) and its cities for both Urban Growth Area (“UGA”) expansions and changes in zoning. The latter is primarily to provide for more dense development and affordable housing required under recent legislation.

There is a critical missing piece in the material provided for consideration by the Board of County Councilors (the “Board”): there is no map identifying precisely what new comprehensive plan and zoning designations will apply to individual areas or properties. Where will the density be? Where will UGAs be expanded? It is not possible to tell precisely where the UGA expansions and changes to zoning are to finally occur as there is no map provided with the hearing materials identifying this information. How can property owners be expected to testify as to their views on these issues without knowing what changes (or lack of changes) are being proposed for their properties?

The Board is holding a public hearing this week and asking for the public’s input. Will the Board hold another hearing again once a map is published containing more precise information? Is it the case that staff will create this map without the Board hearing from the public on its contents? Without a map available for the January 8th hearing we are compelled to ask these questions respectfully, and they are not rhetorical. Due process rights of those owning property in Clark County as well as the requirement for enhanced public participation are being ignored here.

We have clients (and have spoken with others) who are waiting to determine what changes, if any, will be made to the comprehensive plan and zoning designations for their properties. The materials provided for this week’s hearing simply do not identify such information. In this regard, it is premature to hold this hearing until property owners can fully understand what the County and its

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cities are proposing. Staff, having done the math to determine the amount of housing it needs, and determined what new zones are needed that are dense enough to accommodate new housing, can certainly have GIS create this map. And, notice to property owners aside, how can the Board make responsible and legally defensible decisions without being able to accurately identify where new densities will occur as well as where UGAs will expand? These are fundamental requirements of the Growth Management Act.

If staff intends to present a map at the public hearing this week, the County's notice provisions for providing material in advance have not been met and we object to proceeding on that basis.

Thank you in advance for considering this critical issue. Feel free to reach out to me on my cell (360-921-4744) if you have questions.

SWH:cjh