

From: [Jeffrey Delapena](mailto:Jeffrey.Delapena@clark.wa.gov)
To: egolemo@sgaengineering.com; [Cnty 2025 Comp Plan](#)
Cc: [Jack Harroun \(Planning Commission Member\)](#); [Karl Johnson \(Planning Commission Member\)](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: DEAB Comment- January 15th 2026 Public hearing the Clark County Comprehensive Plan
Date: Friday, January 16, 2026 10:48:00 AM
Attachments: [DEAB Comment- January 8th 2026 Public hearing the Clark County Comprehensive Plan.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Eric,

Thank you for providing this feedback related to last night's continuation of the Joint Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Council and the rest of the Planning Commission. This will also be added to the Index of Record.

Best,



Jeff Delapena
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From: egolemo@sgaengineering.com <egolemo@sgaengineering.com>
Sent: Friday, January 16, 2026 10:41 AM
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Subject: DEAB Comment- January 15th 2026 Public hearing the Clark County Comprehensive Plan

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County Council and Planning Commission,
I testified at the hearing on 1/15/26. But ran out of time to get to the last few items.
Attached is a written copy of the full testimony for the record.

Sincerely,
Eric

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DEAB Comment- January 15th, 2026 Public hearing on the Clark County Comprehensive Plan

County Council,

My name is Eric Golemo (spell it out). I am with SGA Engineering. 2005 Broadway, Vancouver, WA 98663.

I am providing the following comment on the Clark County Comprehensive Plan and Agricultural Study on behalf of DEAB (The Development and Engineering Advisory Board). We are the council's advisory board for items related to Development and Engineering.

Comprehensive Plan:

This is an extremely important decision that will shape our community for years to come! Of the proposed alternatives, we support Alternative 3 (or really a blend of 2 and 3). That said, all the alternatives fall 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!

Let's take a quick minute to consider what this County looked like 20 Years ago and how far we have come. That growth came from a variety of sources. Areas like Vancouver have seen amazing redevelopment and revitalization along the waterfront, downtown core, and strategic corridors. Growth outside of that core in Clark County, has provided homes to thousands of Clark County residents providing stability and improvements to their quality of life. New homes have been built in our smaller cities providing thousands of families with the dream of home ownership and a shot at the American Dream! I want to highlight Ridgefield, one of the fastest growing cities in WA! What an amazing and vibrant community it has become! They did it through good planning and public private partnerships. New businesses have moved in to support that growth and provide jobs and fuel our local economy. I am pretty proud to call Clark County my home! People have moved here for a reason! We have a unique character. We should not try to become Portland!

Now let's fast forward 20 years into the future. Do we think that we will really be able to accommodate our growth with no significant expansion of the UGA. Almost zero new land is being allocated for new owner-occupied single family homes.

Growth is not easy. It is more difficult if we fail to plan. But it will happen regardless. Growth fuels our community, provides our homes and workplaces. We need to adequately plan and make reasonable assumptions! 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.

Now that the tone is set and I have your attention, let's get into some technicals.

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.

The recommended plan grossly overestimates what will convert and redevelop. We will be in a structural deficit immediately after adoption and will not get close to our density goals.

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 recommended 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 recommend 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. In addition, many of the assumed densities are not practical or obtainable. I recently saw in a county document that they are assuming 100 du/acre along HWY 99 in the VBLM. Those are midrise apartments with parking garages. We have not historically seen densities like that outside our urban core! A recent study was done by Johnson Economics documenting actual achieved density over the last 5 years in Clark County. It shows that The average density achieved across the identified developments was less than 12 units/acre, compared to the average assumed density of 17.6 units/acre assumed in the VBLM (68% off).

In addition, Target densities are increasing across the board with this plan assuming most low-density zones at about 14 units per acre and Multifamily about 22-40+ units per acre. They are to the point that they are either not going to be built or not be compatible with the surrounding area. Our current codes and processes (like access and circulation codes /road mods) don't really even allow for those densities.

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.

Also, 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 increase 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. I have heard the argument that single family homes are not an efficient use of land and not being included in future planning. Again, planning is not just an accounting exercise. We need to be stewards of our quality of life and the character of our community. Meeting most of our future housing needs with high density apartments 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. Anyone who has owned their home for a significant amount of time can attest to that! 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.

To conclude, 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. **A modified Alternative 3 is the best of the options presented. (As we understand, Alt 3 includes all the site-specific requests. But they are not all equal. They should not all be lumped together. They need to be looked at individually, which has not been done to my knowledge. 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.

Agricultural Study:

That is a segway to the next item, which is the AG study and how it relates to the Comp plan. The challenge we are running into is that as we have grown and the UGA expanded, we have bumped up against some AG land in many locations. The areas around these parcels are now characterized by Urban development. Agriculture on some of these parcels is no longer productive or practical. These are some of the parcels the cities have requested to be rezoned to more compatible uses. If they do not convert, development will need to leapfrog over them, creating less efficient planning. They block critical transportation and utility corridors. That also causes more environmental impacts and sprawl. We will have vacant parcels surrounded by urban development. We need to plan smarter.

One of the 15 goals (Goal 8) of GMA includes conservation of **productive** agricultural lands.

But it also requires balancing the goals and that doesn't supersede all other goals including housing (4) and economic development (5).

We need to protect economically viable AG land. I am not going to argue against that. But we need to have balance and be practical. Not all AG lands should be treated the same and have different circumstances.

The AG study studied primarily if parcels were capable of sustaining agriculture, not if it would be Productive or economically viable.

It looked at 2 main criteria and mostly ignored the 3rd which was more discretionary.

The 1st is if it is characterized by urban growth.

The parcels themselves will not, because code prevents that. It is adjacent areas that we should have looked at.

The 2nd is if they are used or capable of being used for AG. Primarily Soils. Interestingly it found that almost all the soils in Clark County met this criteria. There was nothing unique about AG zoned Parcels. As a matter of fact, much of the agriculture in Clark County is on parcels zoned Rural not AG. Agriculture is allowed everywhere. So, it is possible to replace it if appropriate. The reason they were originally zoned AG is because that was the

prominent use when the comp plan was established. No one anticipated that it wouldn't be modified as conditions changed.

The third was 11 discretionary criteria for determining long-term commercial significance. This is perhaps the most significant. But most were not considered, just soil, tax status and parcel size.

We already discussed soil type.

Tax status is a pretty low bar and mostly used to defer property taxes. Pg 37 of the AG study shows that Pasture, hay, or no crop occupies more than 80% of the land in their study area.

AG has also become more productive on smaller parcels with newer technologies. That has become a prominent pattern, and the 20 Acre min. is less relevant now.

Some items like water rights, proximity to urban growth, urban infrastructure patterns, land use intensity, history of development, or land values were not considered. Per the study, "They would have been considered a negative indicator for commercial significance." They would have impacted too much of the designated agricultural lands. But just because we chose not to consider these items, doesn't mean they are not relevant.

A single-family home is considered an inefficient use of land. But, one home on 20 acres zoned AG that is not commercially viable, growing hay is in need of protection when that use could be replaced in more appropriate areas.

In summary, we need to consider rezoning **some** uneconomically viable agricultural land adjacent to, or surrounded by urban development to more efficiently utilize the land and adequately plan for our growth. I would pay special attention to the parcels the cities have asked to be included. But the COV UGA may have similar parcels that were not really analyzed.

Thanks again for the opportunity to speak and for your consideration.