

**From:** [Jeffrey Delapena](#)  
**To:** [Victoria Abram](#)  
**Cc:** [Jose Alvarez](#); [Oliver Orjiako](#); [Rebecca Messinger](#)  
**Subject:** FW: DEAB and Comprehensive Plan Memo  
**Date:** Thursday, April 23, 2026 8:18:00 AM  
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[DEAB Comment- April 27th 2026 Public hearing on the Clark County Comprehensive Plan.pdf](#)  
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[image007.png](#)

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Good morning, Victoria,

Thank you for forwarding DEAB's memo related to the April 27<sup>th</sup> public hearing.

I am adding Rebecca Messinger to distribute these comments to the Council. These will also be added to the Comprehensive Plan Index of Record.



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**From:** Victoria Abram <Victoria.Abram@clark.wa.gov>  
**Sent:** Wednesday, April 22, 2026 2:55 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>  
**Subject:** DEAB and Comprehensive Plan Memo

Good afternoon,

The DEAB members have presented this memo regarding the April 27<sup>th</sup> public hearing. They've requested this memo be forwarded to the council – is this something that you would be able to assist with?

I appreciate any guidance you could provide.

Thank-you,



**Victoria Abram**

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## Memorandum

TO: Clark County Council  
FROM: DEAB  
DATE: April 20, 2026  
RE: DEAB Comment- April 27<sup>th</sup>, 2026, Public hearing on the Clark County Comprehensive Plan

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The Development and Engineering Advisory Board (DEAB) reviewed documents, recommendations, and proposals regarding the Clark County Comprehensive Plan Update and Agricultural Lands Study and submits the following comments.

This is an extremely important decision that will shape our community for years to come. Of the proposed alternatives, we support a blend of 2 and 3 which would include Alt. 2 and some of the site-specific requests near or adjacent to the current boundary. That said, all the alternatives fall short for our future growth that is practical to achieve and consistent with development patterns, and some targeted expansion of the Urban Growth Boundary is necessary to adequately address the housing shortage and affordability crisis.

### Comprehensive Plan Concerns:

Clark County is facing a housing supply crisis, and the proposed plan risks making it worse. The current strategy relies heavily on increased density within the existing Urban Growth Boundary (UGA), while providing little to no meaningful expansion of buildable land. This approach assumes levels of redevelopment and density that are not economically feasible or historically achievable.

Recent data shows that actual development densities are significantly lower than modeled assumptions, and many of the targeted housing types, particularly those serving lower income levels, require subsidies that are not reliably available. As a result, the plan risks creating a structural housing deficit immediately upon adoption. Planning for housing that is not financially viable to build does not solve the housing crisis, it deepens it.

Additionally, the plan largely excludes opportunities for new single-family, owner-occupied housing. This has long-term implications for affordability, homeownership, and wealth-building opportunities within the community. Overreliance on high-density housing risks shifting Clark County away from balanced housing options and limiting access to homeownership for future generations.

DEAB recommends:

- A modified Alternative 2 that more realistically reflects achievable densities and includes some of the site-specific requests near or adjacent to the current boundary.
- Targeted expansion of the Urban Growth Boundary to increase supply of buildable land.
- Inclusion and increasing the supply of all housing types, including owner-occupied housing.
- Align the planning assumptions with what is practical and cost effective to provide and making them consistent with market feasibility and development patterns.

### **Agricultural Lands Study Concerns:**

The Agricultural Lands Study, as currently structured, appears to not adequately distinguish between land that is technically capable of agricultural use and land that is economically viable for long-term commercial agriculture.

Many designated agricultural parcels are already surrounded by urban development, lack practical viability, and create inefficiencies in infrastructure planning. Preventing these lands from transitioning to more appropriate uses can result in fragmented growth patterns, increased infrastructure costs, and unintended environmental impacts.

The study places heavy emphasis on limited criteria, primarily soils and tax status, while giving insufficient weight to factors such as surrounding development patterns, infrastructure access, land values, and actual agricultural productivity.

DEAB recommends:

- A more balanced and practical evaluation of agricultural lands that considers all applicable criteria, including economic viability.
- Recognition that not all agricultural lands have equal long-term value.
- Strategic conversion of select agriculturally zoned parcels, particularly those adjacent to urban areas, to support efficient growth and infrastructure planning.
- Establish a process of Transferring development rights.

### **Conclusion**

Clark County must do more than technically comply with state requirements; it must adopt a plan that is realistic, implementable, and responsive to market conditions. Without meaningful adjustments, the current approach risks constraining housing supply, increasing costs, and limiting opportunities for future residents.

A successful plan must balance density with land supply, protect truly viable agricultural lands, and ensure that growth is both achievable and aligned with the community's long-term vision.

Thank you for your time and consideration.