

From: [Cnty 2025 Comp Plan](#)
To: [Ryan Hurley](#); [Cnty 2025 Comp Plan](#)
Cc: [Dawn Rhoads](#); [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: UGB comments
Date: Friday, June 12, 2026 4:59:14 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Ryan,

Thank you for submitting comments regarding the 2025 Comprehensive Plan Update, related to six referenced parcels' inclusion in the UGB.

I am forwarding to additional members of Staff, and this comment will be added to the Comprehensive Plan Index of Record.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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From: Ryan Hurley <ryan@hurleydev.com>
Sent: Friday, June 12, 2026 4:53 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Dawn Rhoads <dawnr@hurleydev.com>
Subject: UGB comments

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I am writing to request inclusion of parcels 168633000, 168634000, 168635000, 168636000 into the UGB (for which I own or can speak as a representative of the owners). I also want to voice my support of inclusion of adjacent parcels 115621190 and 168611000 (which are owned by others, but I am aware that the other two owners also support inclusion of their parcels).

Of the options that were under consideration by the County Council and Planning Commission, these six parcels were included in the UGB under Option 3 and rezoned as a mix of R1-5, R1-6 and R1-7.5. Under Option 2 (and in the Council's Preferred Alternative) they were not included in the UGB and remain zoned Ag-20.

It is my understanding the Council's decision is not yet final, and some adjustments may still be made.

These six parcels are right on the border of the current UGB (at the intersection of NE 88th Street and NE 182nd Ave) making them an ideal location for incremental expansion of the UGB to help support the goal of affordable housing in the county, without making a dramatic expansion of the border.

These parcels are not serving an useful agricultural purpose in their current Ag-20 zoning, as they are low grade with poor soil making them currently unproductive as farmland, and having no meaningful long-term commercial significance for agriculture. Given their proximity to other housing developments, these parcels would be of far greater use to the county as housing.

The six parcels together would add 220 acres of potential housing. Allowing housing development on these parcels would be within the character of the surrounding neighborhood much of which has already been developed into urban subdivisions. Adjacent parcels just across the street are zoned R1-10 and R1-20 for Low-Density Residential. Some of these adjacent parcels would be rezoned to R1-7.5 under the Council's Preferred Alternative. Public water and sewer is already installed just to the south in NE 87th Way and in NE 182nd Avenue which means critical infrastructure is already well placed to support additional housing in this location.

I respectfully ask that the City Council take steps to bring parcels 168633000, 168634000, 168635000, 168636000, 115621190 and 168611000 into the Urban Growth Boundary, regardless of which plan option is ultimately adopted by the Council.

Sincerely,
Ryan Hurley

Hurley Development, LLC and
Hurley Investment Holdings I, LLC

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