From:	Cnty 2025 Comp Plan
To:	Kelly L. Hickok; Cnty 2025 Comp Plan
Cc:	Darlene Ferretti; James D. Howsley; Oliver Orjiako; Rebecca Messinger
Subject:	FW: Record Submission: 2025 Clark County Comprehensive Plan Update
Date:	Monday, October 12, 2026 4:26:20 PM
Attachments:	image001.png image002.png LT Clark County re Battle Ground UGA 10.12.2026.pdf image003.png image004.png image005.png image006.png

Hello Kelly,

Thank you very much for submitting Jordan Ramis' comments related to the 2025 Comprehensive Plan update.

Confirming this has been received and will be added to the Comprehensive Plan Index of Record. Forwarding to additional staff as well to be shared with the council.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Kelly L. Hickok <kelly.hickok@jordanramis.com>
Sent: Monday, October 12, 2026 3:54 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>; James D. Howsley <jamie.howsley@jordanramis.com>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: Record Submission: 2025 Clark County Comprehensive Plan Update

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please accept the following attachment to be submitted into the record for the 2025 Clark County Comprehensive Plan Update.

Please confirm receipt of this email and the attached document at your earliest convenience.

Thank you,

Kelly L. Hickok | Attorney
Direct: 503-598-5557

JORDAN RAMIS

jordanramis.com | (888) 598-7070
Portland | Bend | Vancouver WA



DISCLAIMER: This e-mail is for the sole use of the intended recipient(s). It contains information that is confidential and/or legally privileged. If you believe that it has been sent to you in error, please notify the sender by reply e-mail and delete the message. Any disclosure, copying, distribution or use of this information by someone other than the intended recipient is prohibited.

JORDAN RAMIS

Jamie D. Howsley
jamie.howsley@jordanramis.com
WA Direct Dial: (360) 567-3913
OR Direct Dial: (503) 598-5503

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

October 12, 2026

VIA EMAIL

Clark County Community Planning
c/o Oliver Orjiako, Community Planning Director
1300 Franklin St
Vancouver, WA 98660
Email: oliver.orjiako@clark.wa.gov
Comp.plan@clark.wa.gov

Re: 2025 Comprehensive Plan Periodic Update – Submission in Support of Site-Specific Request: APN 193085000

Dear Mr. Orjiako:

This office represents BGround LLC, the owner of Assessor's Parcel No. 193085000, located at 21708 NE 72nd Ave in the Dollars Corner neighborhood, about one mile west of Battle Ground (the "Property"). The Property is currently designated Rural Commercial in the Comprehensive Plan and zoned CR-2, Rural Commercial.

With the existing rural commercial development on and around the Property, this area is clearly characterized by urban growth. Nearby businesses include a drainage contractor, equipment rental, a garage door contractor, two auto mechanics, and an RV repair company. Nearby civic uses include a Moose Lodge and Clark-Cowlitz Fire Rescue Station 26. These uses are illustrated on the Google aerial photo which is enclosed as part of the attached GIS Fact sheets.

Excellent transportation access to Interstate 5 is provided by SR 502, located just one parcel north of the Property. Sanitary sewer service is available in the City of Battle Ground. Potable water is available from the Battle Ground Water District in the city as well. Battle Ground School District will accommodate nearby residents. And Clark-Cowlitz Fire and Rescue provides emergency services, with Station 26 located just across NE 72nd Ave. These urban facilities are also shown on the attached GIS Fact sheets which provide maps from Clark County's own MapsOnline. This data demonstrates the Property and Dollars Corner are characterized by urban development.

The proposed Battle Ground UGA expansion would extend the city to the west along the SR 502 corridor, by adding 161 acres, including the Dollars Corner neighborhood. The Property will be designated Commercial with an Urban Holding overlay on the Comprehensive Plan Map. The zoning will be Regional Commercial. This letter is to support those changes, and will explain why the opposition to them lacks merit, both as a matter of land use planning and as a matter of Washington law.

Opponents argue that the existing Battle Ground UGA has sufficient capacity for employment uses. However, as correctly noted by planning staff in Issue Paper 5, "The GMA does not dictate a data source that must be considered in planning for future employment."[1] In other words, Clark County has flexibility to plan for urban employment uses. Table 6 of that paper allocates future employment to various areas within the county, and allocates 7,449 jobs to Battle Ground. The table notes the 2023 VBLM capacity is only 5,544, which leaves a deficit of 1,905. Opponents do not provide an alternate data source, or otherwise explain why the 2023 VBLM is inaccurate regarding current and future employment capacity for Battle Ground. Therefore, the argument that Battle Ground does not need additional land for employment uses lacks merit.

RCW 36.70A.115(1) requires Clark County to "provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth[.]" It is appropriate and lawful for Clark County to rely on the 2023 VBLM as the data source to justify expansion of the Battle Ground UGA. It is the right choice to use the existing rural commercial properties around Dollars Corner as the land suitable to remedy that deficit, because urbanization will allow increases in employment density. This new UGA lies between Battle Ground and Interstate 5, and along SR 502. This location leverages the existing state route infrastructure and reduces out of direction travel, with all the consequent benefits for reduced fuel consumption and reduction of greenhouse gases.

We support the designation of the Dollars Corner neighborhood for expansion of the Battle Ground UGA, and appreciate your support for the future employment uses which will be developed.

Very truly yours,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

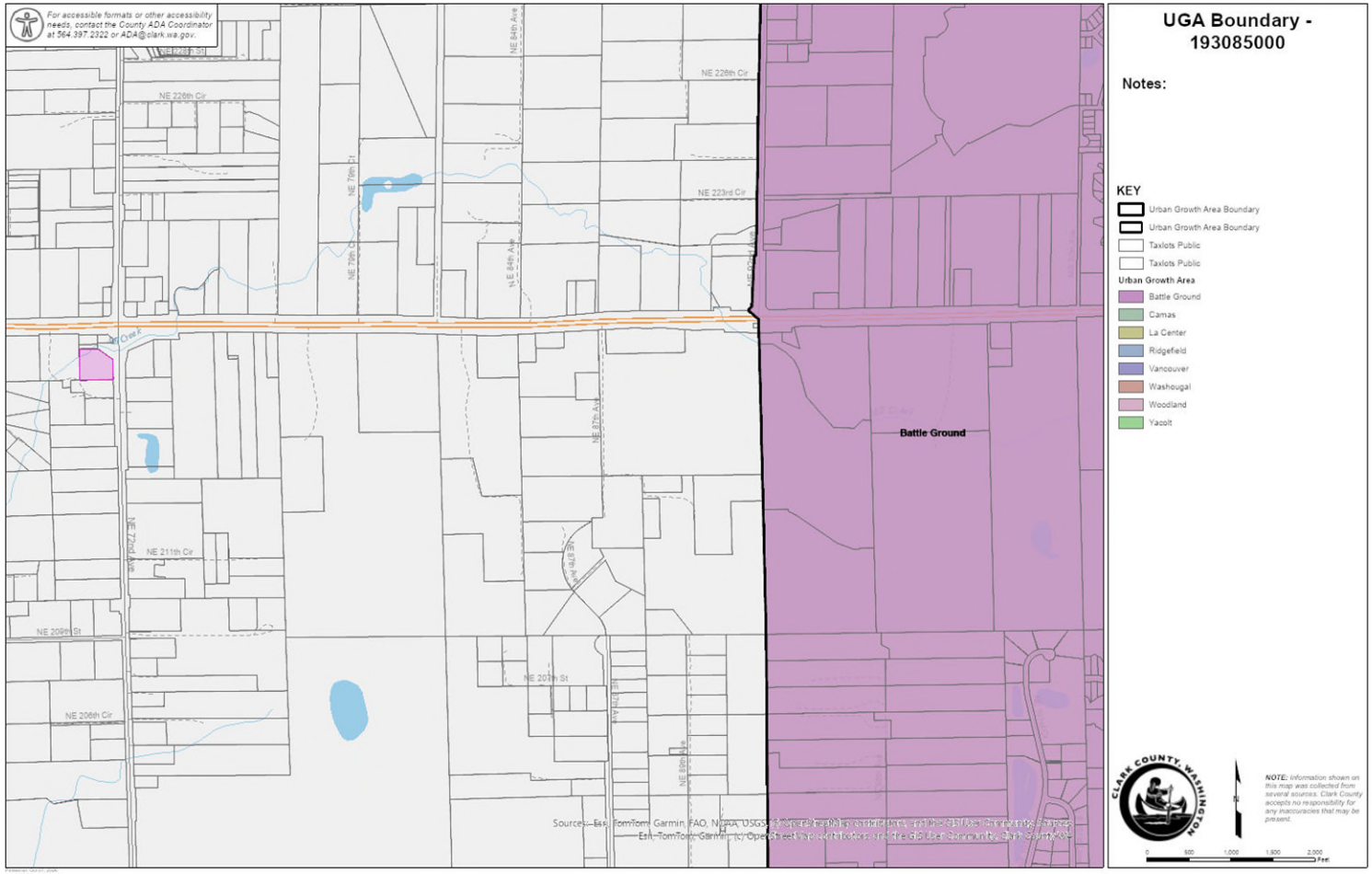
[1] Issue Paper 5: Population, Housing and Employment Allocation, 2025 Comprehensive Plan Periodic Update (January 17, 2024); page 5.

GIS Fact Sheet – APN 193085000

APN 193085000

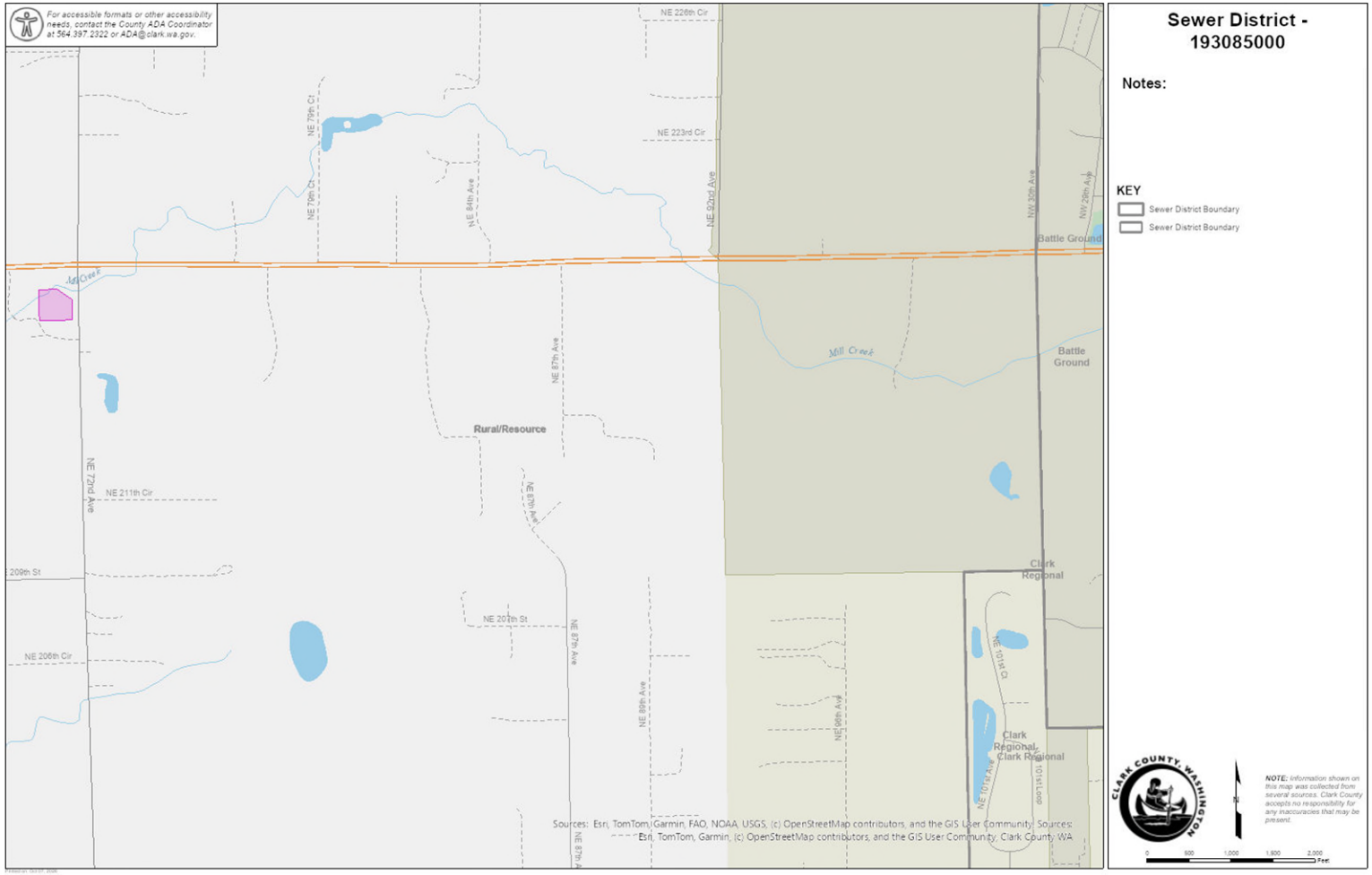
City: Battle Ground
Property address: 21708 NE 72nd Avenue, Battle Ground, Washington 98604
Property identification number: 193085000

GIS Fact Sheet – APN 193085000



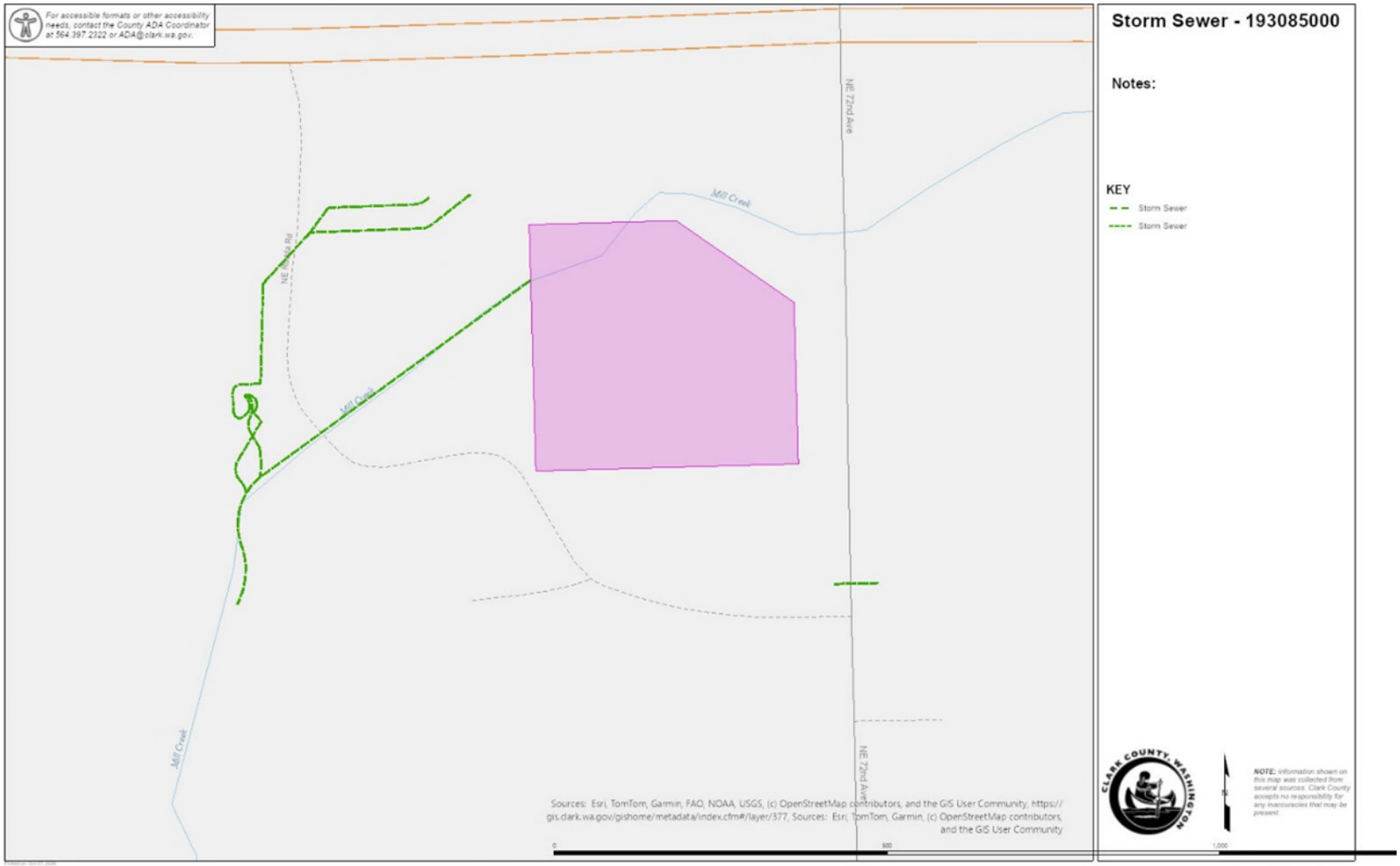
57789-83715 4922-6289-2503.1

GIS Fact Sheet – APN 193085000

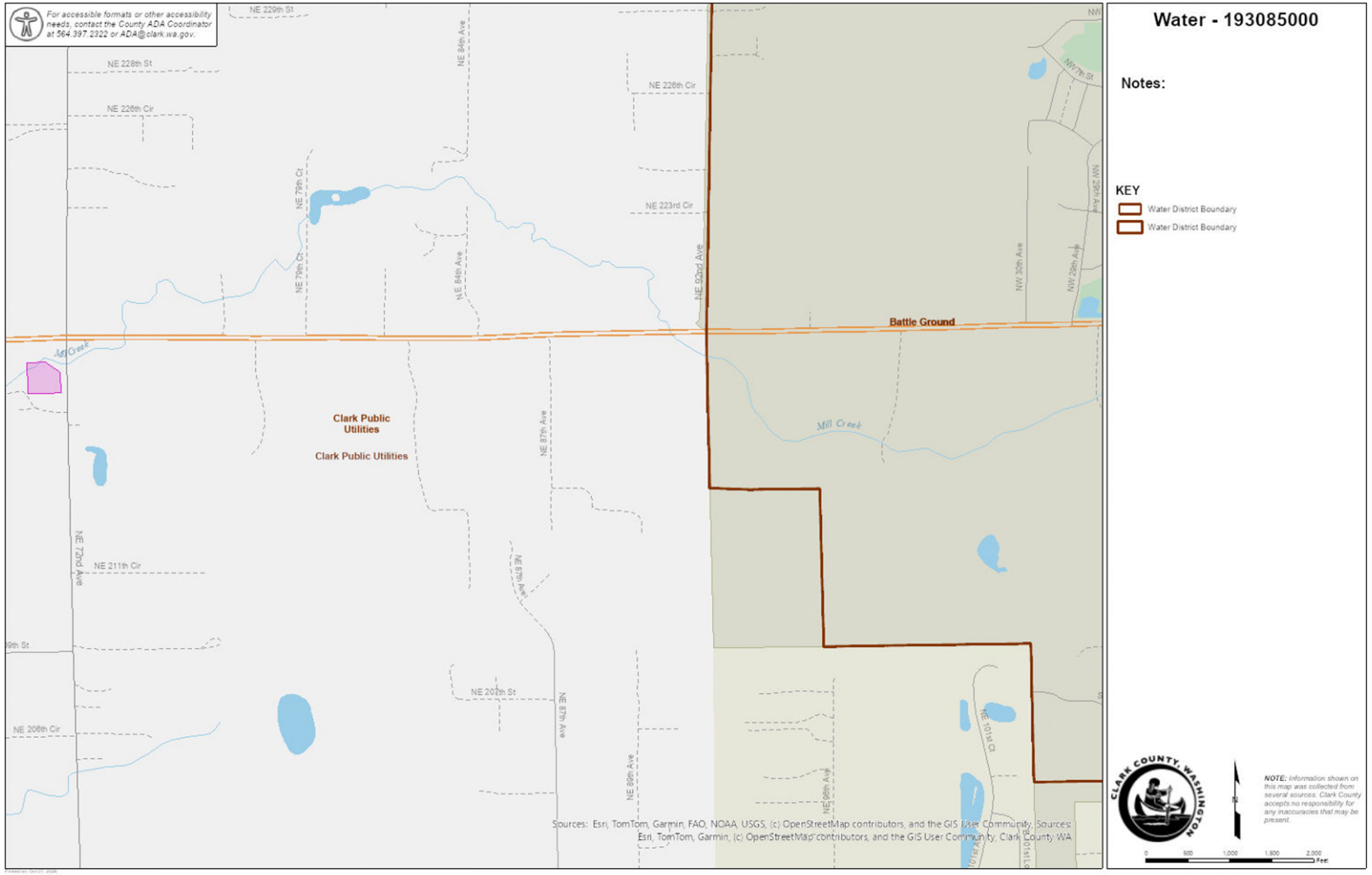


57789-83715 4922-6289-2503.1

GIS Fact Sheet – APN 193085000

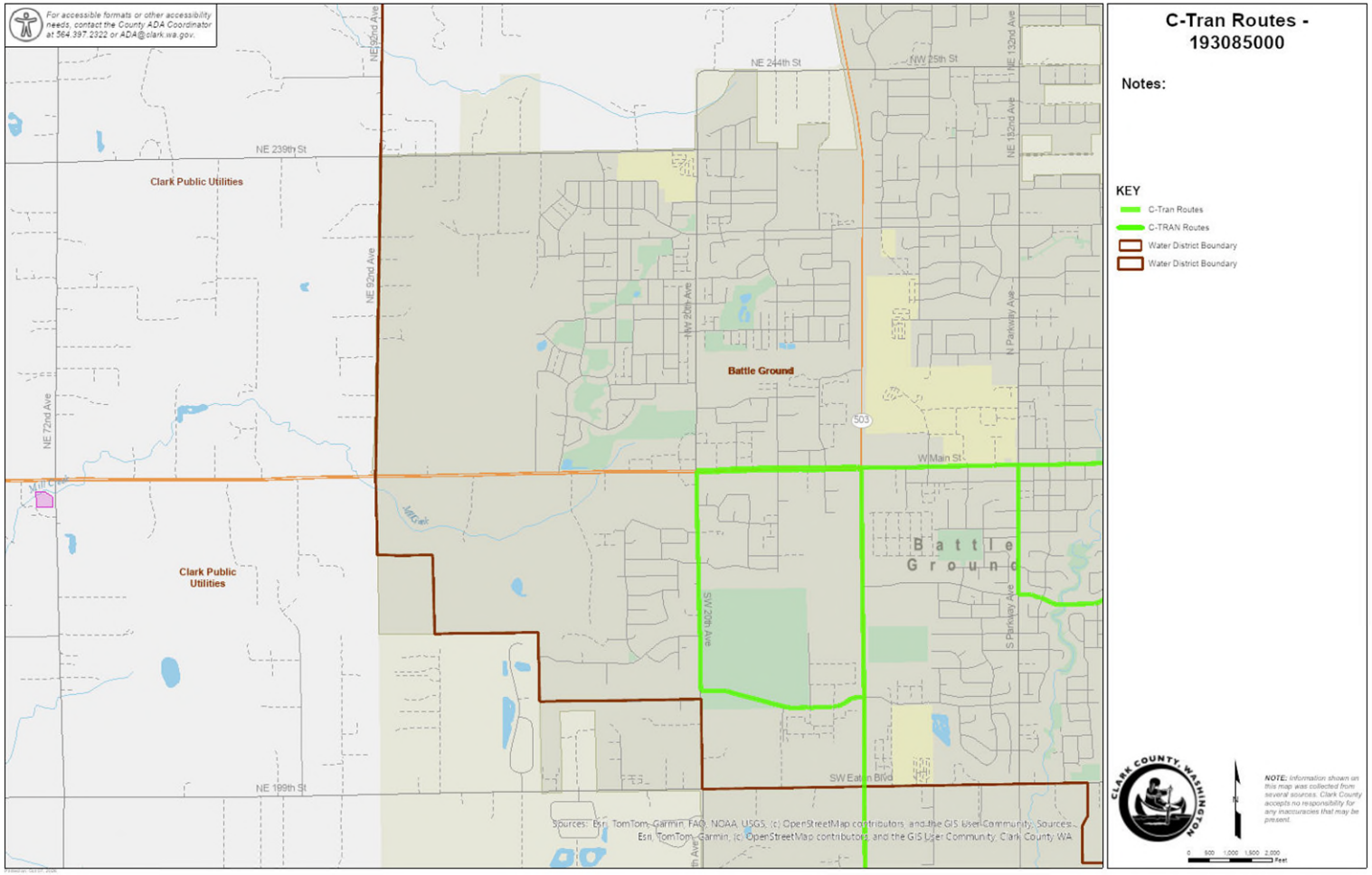


GIS Fact Sheet – APN 193085000



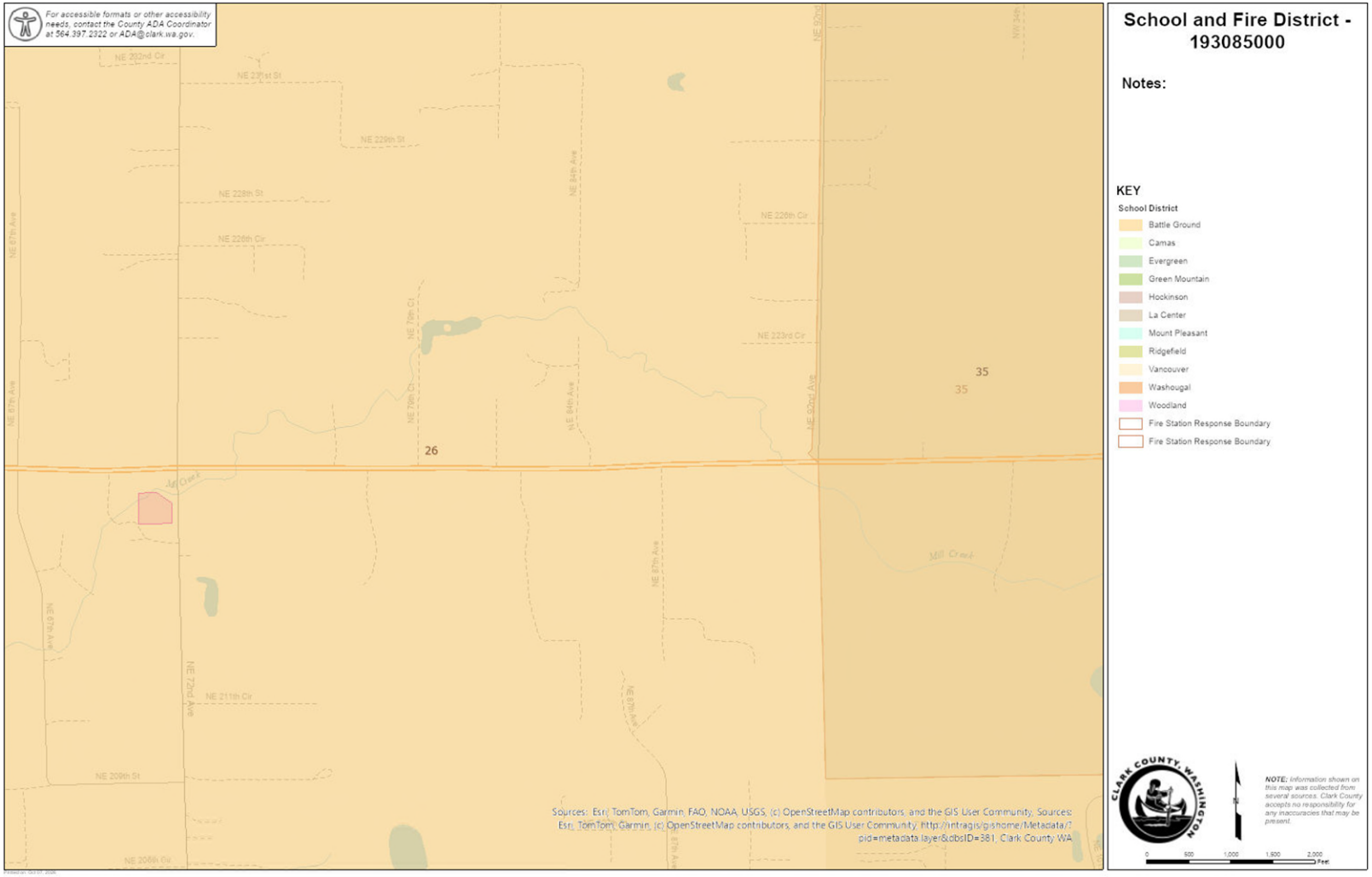
57789-83715 4922-6289-2503.1

GIS Fact Sheet – APN 193085000



\

GIS Fact Sheet – APN 193085000



57789-83715 4922-6289-2503.1

GIS Fact Sheet – APN 193085000

Clark County MapsOnline 2020 – APN 193085000



GIS Fact Sheet – APN 193085000

Clark County MapsOnline 2023 – APN 193085000



GIS Fact Sheet – APN 193085000

Google Maps Image 2026 – APN 193085000

