

**From:** [Sonja Wiser](#)  
**To:** [Snodgrass, Bryan](#); [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#); [Jacqui Kamp](#); [Jenna Kay](#); [Jose Alvarez](#); [Bart Catching](#)  
**Subject:** RE: City of Vancouver comments on Clark County Comprehensive Plan Update Public Participation Plan  
**Date:** Wednesday, February 8, 2023 7:09:03 AM  
**Attachments:** [02 07 23 COV comments on County PPP.pdf](#)  
[image001.png](#)

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Good morning Bryan. Thank you for your comments related to the 2025 Comp Plan/Public Participation Plan. Your comments have been forwarded to staff and will be added to the 2025 Comp Plan Index of Record. Your name and email has already been added to our database to receive future communications related to the 2025 Comp Plan. Thanks again.

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**From:** Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>  
**Sent:** Tuesday, February 7, 2023 4:54 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jacqui Kamp <Jacqui.Kamp@clark.wa.gov>; Larisa Sidorov <Larisa.Sidorov@clark.wa.gov>  
**Subject:** City of Vancouver comments on Clark County Comprehensive Plan Update Public Participation Plan

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Thank you

**Bryan Snodgrass | Prinicpal Planner**  
**Pronouns: He/Him/His**



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February 7, 2023

Oliver Orjiako, Director  
Clark County Community Development Dept.

RE: City of Vancouver Comments on the draft Clark County Comprehensive Plan Update Public Participation Plan (PPP)

Thank you for the opportunity to comment on the draft County PPP, and to attend the informative public kick-off meeting held on January 19. The PPP establishes the scope of the Comprehensive Plan update and the timing of actions, as well as ways for the public to participate. We appreciate the draft's succinctness, its well-articulated goals, and the various listening opportunities it provides. Our comments here are focused primarily on ensuring that needed information is available for meaningful and informed participation by the public and stakeholders, and ultimately for decision-makers.

We would respectfully recommend adding the following to the draft PPP and subsequent process:

1. **Include an informational meeting with Office of Financial Management (OFM) forecasters before adopting a local Countywide Population forecast.** This important choice which drives the regional planning process is proposed to be made more quickly than in prior updates, and with only one public hearing. The stakes from this are significant, as the state's medium and most likely forecast would mean increasing countywide population by roughly 175,000 people from now until 2045, almost the equivalent of adding another City of Vancouver. Since the state provides the allowed range of forecasts to choose from, the public, stakeholders and decision makers would benefit by being able to hear directly from OFM staff about how their forecasts were created, what factors they do and don't consider, and how accurate prior forecasts have been, before the local adoption choice is made. Vancouver would be happy to assist in facilitating an in-person or virtual meeting, or host one ourselves. OFM staff have indicated they are willing to participate.
2. **Include an informational meeting with Department of Commerce staff on recently adopted housing requirements.** Under new HB 1220, cities and counties are now required to plan for and accommodate set numbers of housing units in various affordability ranges, including emergency housing, based on the overall population targets chosen. These numbers are also big. For example, if Clark County selects the OFM medium countywide forecast, local jurisdictions would together need to plan for and accommodate roughly 36,000 housing units affordable to those earning 50% of Area Median Income, another 16,000 units affordable at 80% AMI, and emergency housing for 3,400 persons. Depending on how countywide growth is allocated locally and other factors, it appears the unincorporated Vancouver UGA might face a third of this burden, or more. An informational meeting with DOC staff could provide local public, stakeholders, staff, and decision makers a shared understanding of what these requirements entail. Whatever the technical outcomes of the HB 1220 requirements or other bills now being considered by the legislature, housing requirements for local

governments are likely to be considerably more far reaching than ever before, and informing all parties, particularly the public, sooner rather than later in the process is, in our view, key to a successful plan update process. We are also happy to assist in facilitating this meeting, which potentially could be combined with the first meeting listed, or host it ourselves.

3. **Address the buildable lands model before issuing the Draft Environmental Impact Statement, not after.** Growth data shows that the current buildable lands model significantly underestimates actual residential growth capacity. Using it in the EIS may effectively mislead the commenting public, as well as decision makers, by mistakenly estimating that various land use scenarios will result in significantly less population growth and cost less to serve than is likely to occur in practice if they are adopted. The current model was adopted in 2022 to estimate whether there was or was not sufficient existing land as part of the Buildable Land Report, not to size new UGA boundaries, which is more practically and legally challenging. More importantly the current model was adopted following a review of individual input assumptions in isolation, with no testing of the overall model results against actual population growth to determine the model's overall accuracy, and little to no response when the model's results were then shown to be inaccurate in the face of growth and development data. We also understand the new HB 1220 housing requirements will effectively require revisiting some aspects of the model. This issue needs to be resolved so there are reasonably accurate model results to plan the region's future growth and capital facilities, and to engage the community.
4. **Describe County and City roles consistent with state and local policy direction.** The draft's PPP's page 10 summary gives no indication of how GMA and longstanding locally adopted policies temper county final decision-making authority, or that cities have any role outside their existing boundaries. The GMA requires counties to attempt to reach agreement with cities regarding UGAs and justify their position in writing if agreement can't be reached, with the Department of Commerce attempting to resolve formal objections where appropriate (RCW 36.70A.110). UGA review should be conducted jointly including consultation with cities, with the result reflecting a cooperative effort. Procedurally, cities should first propose the location of UGAs (WAC 365-196-310). Local Countywide Planning Policies go further, calling for cities and counties to play partnership roles in the production of plans which provide the opportunity for public and mutual participation, review, and comment including "joint hearings within the urban growth areas" (CPP 1.1.12 and 1.1.13, page 42 of County Comprehensive Plan). A summary of the required collaboration and coordination would be helpful for a shared general understanding by all parties, including the public. A mention of the City role in first proposing UGAs would indicate to property owners or others proposing expansions where they should inquire first. A mention of how the Comprehensive Plan update impacts annexation could also be useful in answering public questions.
5. **Indicate how the draft's Goal 2 for inclusive participation will be met.** We appreciate the PPP's efforts to prioritize engagement with those historically left out of planning processes and have elevated equity goals in our own Comprehensive Plan update process now underway. Every jurisdiction is different, but we would just suggest the PPP include some indications of how the communities cited will be engaged and their input used. Our interest here is strongest in the Vancouver UGA for those communities anticipated to annexed to the City at some point in the future, but the issue applies throughout.

6. **Include information about long term implications of current Comprehensive Plan update decisions beyond 20 years, per state law.** 20-year Comprehensive Plans, growth forecasts and UGAs are required to be reviewed and updated at least every 10 years. WAC 365-196-310(4)(C)(II) and (III) requires that when considering UGAs and forecasts, counties and cities consider the timing of future updates, opportunities for adjustments, and where longer-term land supply limitations exist, the extent to which current forecast options would require increased densities or slower growth in the future. WAC 197-11-440(5)(c)(vii) requires EIS analyses to consider “benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time. The agency perspective should be that each generation is, in effect, a trustee of the environment for succeeding generations. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal.” Clark County has a finite amount of land that can be urbanized, particularly since there is a great deal of sloped and forested land in the northern and eastern portions of the County that may never be suitable for intense development. Decisions made in this update will influence how soon farm and rural lands are depleted, and how soon the rate of growth will be forced to slow because there are no further areas in the County to expand into. For informed community participation, we recommend the County provides a forum for discussion about the desired longer-term future, or at minimum an indication of what would happen if the growth options presented in this update cycle are continued on into the future.

Thank you again for the opportunity to comment on the PPP. We look forward to working with you on the upcoming Comprehensive Plan update, and welcome your input on our process within the City of Vancouver.

Sincerely,



Chad Eiken, AICP, Director  
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