

**From:** [Jeffrey Delapena](#)  
**To:** [Heidi Cody](#)  
**Cc:** [Bart Catching](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Subject:** RE: ACE comment letter on Land Use Alternatives  
**Date:** Thursday, November 7, 2024 11:40:00 AM  
**Attachments:** [image001.png](#)  
[ACE Comments on Land Use Alternatives.pdf](#)

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Good day, Heidi,

Thank you very much for submitting ACE's public comment for consideration in the Land Use Alternatives to be studied in the DEIS.

I am forwarding to members of Staff and will enter these into the Comprehensive Plan Index of Record. Your comments will also be sent to the Planning Commission ahead of tonight's Hearing.

Regards,  
Jeff Delapena

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**From:** Heidi Cody <heidi@waconservationaction.org>  
**Sent:** Thursday, November 7, 2024 11:15 AM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>  
**Subject:** ACE comment letter on Land Use Alternatives

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Hello Jeffrey,

On behalf of Alliance for Community Engagement SW WA (ACE), please find our attached comment letter on Land Use Alternatives for Clark County's Comprehensive Plan. ACE's work on Comprehensive Planning is supported by a grant from the Department of Commerce to Washington Conservation Action. For clarity, I work for both ACE and WCA, as my signature block shows.

I plan on reading a shorter version of this letter tonight at the Planning Commission Hearing. Please let me know if you have any questions.

Thank you,  
Heidi Cody

**Heidi Cody (she/her)**  
SW WA Field Manager  
Washington Conservation Action



ACE Coalition Manager

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1402 Third Ave, Ste 1400, Seattle, WA 98101

Nov. 7, 2024

Alliance for Community Engagement (ACE) SW WA

Dear Clark County Planning Commission and Staff:

Thank you for considering Alternative Land Uses as part of Clark County's Comprehensive Plan update process. House Bill 1181 explicitly states a goal of the Growth Management Act (GMA) is to reduce sprawl, reduce per-capita miles traveled in single occupancy vehicles and promote infill. Sprawl is the antithesis of responsible growth, and of reducing vehicle miles traveled (VMTs). As Clark County adds about 10,000 people per year, the Alternative Land Uses question is crucial to charting a path toward an equitable and healthy future for all Clark County residents, and for preserving forests and agricultural land. Thank you for this opportunity to comment.

### **Please Postpone the Land Use Alternatives Decision**

Alliance for Community Engagement (ACE) SW WA asks that Clark County Planning Commission and County Council postpone making any decisions about Land Use Alternatives until new County Councilmembers are elected. Given the impact land use zoning changes will have, we feel it is more appropriate for the new Clark County Council to make this decision that will profoundly affect our future.

Multiple organizations, including several BIPOC-led community based organizations and Washington Conservation Action, have been granted or sub-granted funds from the Dept. of Commerce to help with Comprehensive Planning at Clark County. Some of these organizations are submitting comments to the Planning Commission today.

ACE, whose participation in Comprehensive Planning is supported by a Commerce grant to Washington Conservation Action, requests additional time to suggest at least one Land Use Alternative detailing our recommendations, in coordination with organizations that have received funding from Commerce to participate in this work. We understand the Planning Commission is currently only considering three Land Use Alternatives. Any other Alternatives need to be considered with a full public process for procedural reasons.

### **Suggested Actions for Land Use Alternative DEIS at Clark County**

#### **1. Reduce Sprawl and Promote Infill**

We recommend Clark County adopt regulations to reduce housing and suburban sprawl until all infill opportunities are exhausted, first within city boundaries, and then within their urban growth boundaries (UGBs). The Washington legislature recently passed four significant housing reforms that make urban infill more affordable: middle housing, accessory dwelling units (ADUs), reduced parking requirements, and reduced building code requirements on 3 and 4 story buildings.

The Growth Management Act's (GMA's) Climate Element Sec. 1. RCW 36.70A.020 and 2021 c 254 s 1 has clear guidance that Clark County should follow. *"The following goals are adopted to guide the development and adoption of comprehensive plans and development regulations... (2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development."*

According to [this study](#), urban infill is almost invariably one of the top three climate action levers within local government control. Urban sprawl, conversely, is directly or indirectly responsible for a third of all greenhouse gas emissions (GHGs). HB 1181 requires counties to reduce levels of GHGs.

## **2. Prioritize Housing Affordability and Variety**

Housing affordability, variety and density are critical for racial and social justice. The GMA Climate Element says: *"(4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."*

## **3. Adopt Sensible Rules around Urban Growth and Facilitate Infill**

The Climate Element of the GMA says: *"(1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner."*

ACE strongly recommends against inappropriately expanding the Urban Growth Boundary. Allowing dozens of requested inclusions to the UGB will exacerbate sprawl and VMTs. Extending the urban growth boundary will also eliminate agricultural land, putting further strain on farmers and working class citizens. This will also push out farmland to further regions, increasing the cost of produce. It will further decimate local farms, which bolster our local economy and provide tax revenue.

Extending UGBs and suburban sprawl invites further car-centric developments, like building longer and wider roads, which greatly increase the tax burden and financial strain on the County and taxpayers. [Roads are one of the most, if not the most, expensive infrastructure overheads](#), and increasing these will both incur debt and increase taxes to maintain those roads (only [18% or less of roads are actually paid for by gas and registration taxes](#)).

Infill can be eased in the following way: Clark County and its cities should make it easier for people to partition their larger lots in single family zones inside city limits or the UGB so people don't have to sell the entire lot to increase the density. But only where it is appropriate, i.e., not outside the UGB where someone might want to sell off a portion of a 5 acre parcel.

Many people who live on large lots may struggle to pay their taxes due to increased property values. They should be able to sell off a part of the lot to raise money and allow for another home or homes to be built without having to share ownership of the land with the new residents. Right now, ADUs are allowed, but generally those remain on the original lot because the city imposes many conditions on being allowed to partition. Currently, people are forced to sell and move if they want to downsize or just reduce upkeep on the landscaping.

#### **4. Transportation Justice**

Regarding transportation, the Climate Element of the GMA says: “(3) Transportation. Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled, and are based on regional priorities and coordinated with county and city comprehensive plans.”

Creating transportation alternatives can greatly reduce county infrastructure overhead costs. Road diets and de-paving over-capacity roads reduce long-term infrastructure spending and debt. Car alternatives, such as public transit and bicycling infrastructure, give people greater financial freedom. Not needing a second car, or a car at all, can often reduce a household spending by [\\$1,100 or more per month](#) (national average of car ownership is \$1,100 currently).

Unrestricted housing sprawl creates additional challenges when remote low-density developments don't have access to public transportation resources or other public services.

#### **In Conclusion**

The Climate Element amendment to the Growth Management Act prioritizes reducing GHG emissions, reducing VMTs and fostering climate resilience to climate impacts. Clark County has an opportunity to plan for a future that incorporates these concerns, in an updated Comprehensive Plan that includes community input in a new way. Clearly, the Dept. of Commerce is interested in input from the groups it has funded—including many BIPOC community-based organizations—to participate in Comprehensive Planning at Clark County. ACE requests that Clark County postpone decisions about Land Use Alternatives until a more equitable, community-based “people’s alternative” can be included in the Land Use Alternatives, and until new County Councilmembers are in office. Thank you for your consideration.

Sincerely,

Alliance for Community Engagement (ACE) SW WA

