

**From:** [Oliver Orjiako](#)  
**To:** [Jeffrey Delapena](#)  
**Subject:** FW: City of Vancouver comment letter for 12/6 County Council hearing on DEIS alternatives  
**Date:** Thursday, December 5, 2024 8:23:50 AM  
**Attachments:** [24\\_12\\_06\\_COV\\_to\\_CCCC\\_DEIS\\_RK.docx](#)  
[image001.png](#)  
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[image003.png](#)  
[image004.png](#)

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Hi Jeff,

FYI and for the record. Thanks.



**OLIVER ORJIAKO**  
Director  
COMMUNITY PLANNING

564.397.2280



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**From:** Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>  
**Sent:** Wednesday, December 4, 2024 4:53 PM  
**To:** Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>  
**Subject:** City of Vancouver comment letter for 12/6 County Council hearing on DEIS alternatives

**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.

Rebecca – Please find the City of Vancouver’s submittal letter to the County Council for the December 6 hearing on the DEIS alternatives. Thank you.



December 2, 2024

Chair Medvigy and Clark County Councilors Belkot, Bowerman, Marshall and Yung:

RE: City of Vancouver recommendations for December 6 public hearing on Clark County Draft Environmental Impact Statement (DEIS) Land Use Alternatives

- 1. Countywide DEIS Alternatives – Include a Cities Alternative, and an Existing Boundaries Alternative accommodating growth targets within existing UGAs.**
  - a. Do not include newly suggested alternatives which expand the Vancouver UGA by 18,000 acres or include every site specific UGA expansion request received countywide regardless of their location. Both would require greatly increasing adopted countywide growth forecasts and reissuing the DEIS scoping notice.**
  
- 2. Vancouver UGA portion of Alternatives – Include new commercial or employment lands in parts of the existing VUGA which lack them, as required to comply with GMA and local Countywide Planning Policies.**
  - a. Do not include two recently proposed VUGA employment expansions which are at inappropriate locations and are based on an undocumented and incomplete need and feasibility analysis.**
  
- 3. Vacant and Buildable Lands Model – Do not selectively re-open the VBLM model to add one new employment assumption that is unsupported by data and ignores existing deficiencies in other employment model assumptions.**

Chair Medvigy and Councilors:

Thank you for the opportunity to comment on the DEIS alternatives, which will set the range of options for County and smaller city Comprehensive Plans, and go a long way to determining whether the Plans can be adopted within required timelines and requirements. We appreciate this Council's efforts in bringing the Comprehensive Plan update to this point and extend our thanks to Councilors Medvigy and Bowerman for their service. With two new Councilors

arriving in January, we respectfully request you consider delaying the December 6 hearing a few weeks until the new Council, which will make final decisions next year, can begin its work. If the December 6 hearing is held, we urge this Council to build upon its earlier adopted decisions and public notices, and not backtrack and change course as some are now effectively proposing.

Over the past two years the County Council has adopted aggressive countywide growth forecasts and allocated them among the local jurisdictions, published the countywide forecasts in the [EIS Scoping Notice](#)<sup>1</sup>, and approved a Vacant and Buildable Lands Model (VBLM) land capacity analysis in [May 2024](#) which found that existing UGAs have sufficient land to accommodate all of the adopted population and housing forecast and almost all of the employment forecast. The capacity of the existing UGAs to accommodate the adopted growth targets will be further increased by upzones proposed by the individual cities in their mapping submitted for this hearing, in order to comply with new GMA housing laws.

Despite this, DEIS alternatives are being suggested by some which would wildly expand UGAs, accommodating many tens of thousands more persons and jobs than local governments have been planning for so far in this update. We urge the Council to follow the recommendations of the County Planning Commission and staff and *not* include any such alternatives, which would require republishing the DEIS Scoping Notice and significantly increasing adopted growth forecasts and their allocations, likely delaying the EIS process and potentially preventing local jurisdictions including the County from meeting GMA adoption deadlines. Including such an alternative would also detract from limited DEIS resources (County staff has indicated there is budget for only two action alternatives), and is not required by GMA. Site specific requests received have been individually listed on the County [website](#) since sometime after the first submittal in November 2021, and have been individually [mapped](#) since 2023. Much of this information was available to be considered by decision makers and the public when countywide growth forecasts were adopted in 2023, and almost all it was available when the Council adopted its growth allocations and VBLM assumptions in May 2024.

For the DEIS, site specific requests consistent with the County Council's foundational growth decisions made over the past two years can be captured in the Cities land use alternatives. Those requests that are incompatible with the Council's basic growth decisions should not be included in the DEIS in our view. DEIS alternatives should be practical, adoptable options that provide different ways of implementing the major decisions already made, not ways of

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<sup>1</sup> The Scoping Notice states that "The Clark County Council adopted a 2045 projection of 718,154 persons and 269,000 jobs. The new growth from 2023-2045 will require accommodating 103,698 housing units and 88,500 jobs."

undercutting those decisions. There is not time in our view to overhaul these decisions, nor a policy reason to do so given the aggressive growth forecasts we are all already working from.<sup>2</sup>

City of Vancouver recommendations are explained in more detail below:

- 1. Countywide DEIS Alternatives – Include a Cities Alternative of the Cities proposals, and an Existing Boundaries Alternative accommodating growth targets within existing UGAs. Do not include newly suggested alternatives which propose expanding the Vancouver UGA by 18,000 acres, or propose including every site specific UGA expansion request received countywide regardless of their location.**

The latest [NWP proposal](#) indicates it would add 18,000 acres and 70,000 housing units to the Vancouver UGA alone, which is completely out of scale with anything contemplated or requested by anyone in this process thus far. It proposes to add 18,000 acres of VUGA expansions although only about 650 acres of VUGA expansions have been requested according to County mapping. Countywide it could almost double the already ambitious current target of adding 100,000 new housing units.

An alternative which includes all UGA expansion requests received countywide regardless of location would also likely add many thousands of acres to UGAs, according to the hearing materials. Just one component of this alternative, requests for UGA expansions onto properties currently designated for agriculture, accounts for 1,700 acres alone countywide according to the [staff presentation](#). Thousands more acres would likely also be added through expansions requested onto lands currently zoned for rural uses, and expansions onto intervening properties which haven't requested to be included but would be forced in to bridge physical gaps between existing boundaries and the requested expansion sites.

More realistic is a 'Cities Alternative' which has been supported in some form by all parties. The latest collective City proposals would require over 2,000 acres of UGA expansions according to the [staff report](#), approximately one third of this on Agricultural lands, which may require process delays to revisit past adoptions and notices. We understand the 2,000 acres of expansions are driven in part by private site-specific requests added recently for

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<sup>2</sup> The adopted countywide 2045 population forecast of 718,154 persons is approximately 20,000 persons higher than what the the state formally predicted is most likely to occur, and what the cities had jointly proposed. HB 1220 amplifies this by requiring local jurisdictions to plan for 103,000 new housing units to accommodate the population forecast. The countywide employment forecast of 269,000 jobs is tied to the population forecast through a highly aspirational target of one job per household.

the good of the process. A Cities Alternative focusing on the core expansion proposals of the Cities as they define them would increase consistency with the past actions.

An 'Existing Boundaries Alternative' is arguably required by [WAC 197-11-440\(5\)\(b\)](#), which states that reasonable alternatives must achieve or approximate a proposal's objectives with less environmental impact, since the County has already found there is sufficient land to accommodate virtually all of the growth targets within existing UGAs, and additional existing capacity has been identified by City and County staff to comply with new housing requirements. An 'Existing Boundaries' alternative could include site specific requests within existing urban areas, as well as site specific requests outside of urban areas to switch from one rural or resource designation to another.

**2. Vancouver UGA employment lands mapping – Include new commercial or employment lands in parts of the existing VUGA which lack them, as required to comply with GMA and local Countywide Planning Policies.**

**Do not include two recently recommended VUGA employment expansions which are at inappropriate locations and are based on an undocumented and incomplete need and feasibility analysis.**

As described in greater detail in [Planning Commission testimony](#), the recommended mapping of employment land in the unincorporated VUGA does not meet several legal requirements, or provide for sound land use or economic development planning in our view. The VUGA does not provide any new commercial or employment lands near existing residential areas which badly need them, which is inconsistent with [HB 1181](#) requirements to lower per capita Vehicle Miles Travelled (VMT) included in new GMA climate mandates, and is inconsistent with longstanding local [Countywide Planning Policy 1.4.1](#) which calls for locating frequently used commercial activities near residential areas. By proposing VUGA employment expansion without first considering existing UGA options, proposed VUGA employment mapping also violates [WAC 365-196-310 \(4\)\(b\)\(iv\)](#). Beyond legal compliance, the failure to add commercial or employment lands near residential areas that lack them will likely result in overcrowded arterials and freeways as residents are forced into longer drives for shopping or employment. Vancouver staff provided a letter attached to Planning Commission testimony identifying 17 potential locations for additional commercial or employment zoning.

The VUGA mapping instead includes two proposed boundary expansions for employment that appear to do little to further economic development, as both sites contain significant

critical lands, are heavily parcelized, and have little evident market support. The site east of WSU has not received a site-specific rezone request for employment land, and the site north of 199<sup>th</sup> Street has only two such requests, accounting for about 5% of its land area. Neither site appears on any Columbia River Economic Development Council (CREDC) inventory to our knowledge. The sites were chosen because they have an Urban Reserve designation that appears to date back to 2007 or earlier, but no analysis is provided as to why the designations makes any sense today. If these VUGA expansions are adopted most of the properties would likely remain undeveloped or be converted to residential land.

There also does not appear to be a documented need for the proposed VUGA employment expansions. The staff report indicates modifications were made to the VBLM mixed use assumptions last approved by the Council in May, but does not indicated why future commercial development should be assumed to only account for 10% of mixed use development when recent development data indicates it accounts for 20%, or indicate why no mixed use buildings are effectively assumed to develop in the mixed use zone for the next 20 years. Furthermore, by selectively focusing in on only mixed use assumptions, the VBLM modifications used to justify the VUGA employment expansions ignore unresolved and previously identified VBLM employment model deficiencies which likely result in underestimation of existing employment capacity.

**3. Vacant and Buildable Lands Model – Do not selectively re-open the VBLM model to add one new employment assumption that is unsupported by data and ignore existing deficiencies and the need to change other inaccurate employment model assumptions.**

The Planning Commission's recommendation to re-open the VBLM by adding an assumption that 10% of vacant employment land and 30% of underutilized land will not develop is not supported by any data or analysis indicating that these numbers reflect what is happening now or what is likely to happen over the next 20 years.

The Commission's selective recommendation to re-open the VBLM to add a single assumption also ignores other previously identified model deficiencies which understate existing employment capacity. First of these is the model's assumption that only 4% of future job growth will be home based, when former Washington Employment Security Department Economist Scott Bailey has indicated the most recent Clark County figure is 20%. The current VBLM model also assumes without explanation that there will be zero private sector job growth in the next 20 years through redevelopment or filling of existing sites or buildings. The current VBLM model also uses outdated employment density assumptions that appear to date back to 2007 with no updates since. As also noted in this letter, current VBLM model mixed use assumptions are also unsupported by development

data. These current assumptions all lack an adequate showing of the work, and result in an overall underestimation of existing employment capacity.

The last Council approval of the VBLM model was in May 2024. If the employment model is to be subsequently modified by staff action or Planning Commission recommendations, these existing unresolved deficiencies must be addressed in order to achieve a model that is legally defensible and reasonably accurate.

Thank you again for the opportunity to comment. The City of Vancouver supports a robust DEIS analysis of alternatives, but as a practical and legal matter these need to be consistent with major growth decisions that have been adopted in this process after many public hearings over the past two years and communicated to the public in the EIS scoping notice, as well as consistent with local and state laws. We respectfully request that the Council stay the course as we head into the final year of the Comprehensive Plan update under new leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Paulsen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Erik Paulsen

Vancouver City Councilmember