

From: [publiccomment](#)
To: [Cnty 2025 Comp Plan](#)
Subject: FW: Council Hearing Public Comment
Date: Thursday, December 5, 2024 9:48:39 AM
Attachments: [image001.png](#)
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Please see the comments below.



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

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From: Clark County <webmaster@clark.wa.gov>
Sent: Wednesday, December 4, 2024 10:00 PM
To: publiccomment <publiccomment@clark.wa.gov>
Subject: Council Hearing Public Comment

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Submitted on Wed, 12/04/2024 - 10:00 PM

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Subject

Comprehensive Plan Update - DEIS Alternatives

Date of Hearing

Fri, 12/06/2024

Comment

Honorable Councilors-

I strongly urge you to consider at least one additional alternative for DEIS analysis for the unincorporated Vancouver UGA than is proposed by staff, one that evaluates several large areas for potential expansion. Simply evaluating an option in the DEIS does not mean the boundary must expand, it simply leaves the County Council some room to make policy choices next year before the Final Environmental Impact Statement is prepared prior to plan adoption.

Please consider that the last major urban growth boundary expansion was in 2007, when the combined county urban growth areas were expanded by around 17 square miles, mostly for residential development. Here we are 18 years later, having experienced robust growth since 2007, and the proposal this time is for no boundary expansion at all for additional residential land for the next 20 years. This is at a time when Clark County has an acknowledged existing deficit of 2500 dwelling units (see Clark County's own Housing Options Study), and housing affordability is at an historic low.

Please also consider that the County's Vacant and Buildable Lands Model (flawed as it is, but that ship has apparently sailed) from June of 2023 indicated that the unincorporated Vancouver UGA can only accommodate approximately 16,500 new dwelling units. Now, faced with the task of accommodating over 40,000 new dwelling units in the unincorporated Vancouver UGA (more than twice the potential capacity identified in the County's own 2023 base VBLM model), the Council is presented with the radical proposition that all new growth can be handled with mere assumptions of increased density (22 units/acre) on all existing low-density residential land and up-zoning (increased densities) of 24, 35, 45 and more units/acre everywhere else. For reference, 22 units per acre can be achieved with 14' wide 3-story townhomes, but not traditional 18'-20' wide townhomes. Many of Clark County's garden style apartment projects (3-story walk-ups, with parking at around 1.8 spaces/unit) are developed at 22 units/acre.

The proposed DEIS alternative being proposed for consideration that includes no expansion of the unincorporated Vancouver UGA represents an alarmingly radical change to character to Clark County. Please try to imagine what this new landscape will look like, what it will feel like, and how it will impact the existing residents, and the new residents we hope to welcome to our community in the next 20 years.

Staff will tell you that this outcome is mandated by the State of Washington, and the County has no choice but to assume that all new housing growth should be in extremely dense townhomes and apartments to meet the State's mandatory affordable housing targets. The proposal before the Council is certainly one way to meet the state's mandates, but it is not the only way. In the proposal before you, the County fails to consider the role of expanding the supply of all housing types, and for the County's existing housing stock to filter through housing market to provide a large portion of the housing needed for those new residents earning 80% or less of the area median income. Rather than considering existing housing stock in that equation, the proposal before you assumes that very large portion of new housing built over the next 20 years must be affordable. I hope it comes as no surprise to the Council that the only way new housing can be affordable (because it's so expensive to build new) is to subsidize the cost of new construction for affordable units. At an average cost of \$300,000/unit for all new construction, subsidizing 20,000 housing units at 50% of the cost of the unit in the unincorporated Vancouver UGA would cost Three Billion Dollars (20,000 dwellings x \$150,000/dwelling). That is a radical departure from how housing is traditionally financed and is a pretty fantastical plan.

Even if achievable, the plan proposed to the Council does not address in the least the impacts to the very community the plan is supposed to serve.

Please, please consider evaluating one or two additional options in the DEIS so that next year you have options to decide on the best approach to accommodate growth in a manner that best serves and suits Clark County. Limiting the alternatives studied in the DEIS will tie the Council's hands next year, essentially forcing adoption of the plan that assumes a radical increase in density to all existing and new neighborhoods in Clark County.

Thank you for your consideration of these comments.

Phil Wuest