

From: [Oliver Orjiako](#)
To: [Jeffrey Delapena](#)
Subject: FW: Letter to Clark County re: DEIS alternatives
Date: Monday, April 7, 2025 10:45:04 AM
Attachments: [25.04.08 COV letter to CCC on DEIS Alternatives.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Jeff,

FYI. For the comp plan index. Thank you.



OLIVER ORJIAKO
Director
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From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Monday, April 7, 2025 10:31 AM
To: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: FW: Letter to Clark County re: DEIS alternatives

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Please find the attached comment letter for the County Council from the City of Vancouver for the April 8 County Council review of the amended resolution relating to the Draft EIS under Separate Business. Thank you.



April 7, 2025

Chair Marshall and County Councilors Yung, Belkot, Fuentes and Little:

RE: City of Vancouver recommendations for April 8 Clark County Council consideration of an amended resolution regarding countywide DEIS land use alternatives:

- 1. Remove resource-zoned expansion proposals from the DEIS land use alternatives, at least in the VUGA, if the required countywide resource study cannot be completed in this update**
- 2. Remove two VUGA expansions for employment recently proposed by County staff**

Thank you for the opportunity to comment, and for your continued efforts to complete the multi-year countywide Comprehensive Plan update process by its December 2025 deadline, and to produce a Draft Environmental Impact Statement (DEIS) this spring. DEIS alternatives are required to be realistic ways of meeting overall project goals. Spending time analyzing and asking for comments on options that can't be adopted or would require reversing two years of Council regional growth decisions already adopted, is not appropriate in our view.

Our recommendations are based on the following:

- 1. Removing requested resource land expansions from the DEIS is the only realistic option without the required countywide resource study, and is needed to be consistent with the foundational regional growth decisions already adopted for this update.**

UGA expansions requiring removal of resource designations cannot legally be adopted without the countywide resources study. Going forward with the DEIS alternatives as they now stand, with numerous requests requiring de-designation without the required resource study, would be wasteful and misleading, as those alternatives could never be adopted.

The resource study will have implications countywide and long into the future, so we believe it need to be done right. As has been noted in County Council and staff discussion, the study

could be conducted after adoption of the Comprehensive Plan, which would allow time to develop the necessary technical information and analysis, and allow for needed public and stakeholder involvement. If supported by the study and desired by the Council, de-designation could occur reasonably soon after – it would *not* be forced to wait 10 or even 5 years. GMA law allows adoption of new growth forecasts and UGA boundaries more frequently than that, as proven by Clark County’s own experience adopting and legally sustaining a full new Comprehensive Plan and boundaries in 2007 only three years after adopting the previous plan in 2004.

Regardless of the study, the DEIS alternatives as they now stand without amendment are also wholly unrealistic unless the Council intends to overhaul regional growth decisions already adopted. In 2023 the Council adopted an aggressive countywide population forecast, more than the cities requested or the state projected as most likely to occur, and an employment forecast to match it. In 2024 the Council approved Vacant and Buildable Lands Model (VBLM) assumptions, including a residential market factor assumption, which found that there was sufficient capacity in existing urban areas to accommodate all targeted population growth without expansion, and virtually all of the job growth. Since that time existing urban area capacity has been increased by upzone proposals identified by the County and the cities in response to state mandates. UGA expansions into resource lands are not needed to accommodate the Council’s aggressive adopted growth targets and capacity assumptions, and the current DEIS alternatives including numerous site-specific expansion requests could not be adopted without major changes to those regional growth decisions.

2. Recently proposed VUGA expansions for employment at two sites zoned Urban Reserve, east of Washington State University (WSU) Vancouver and north of 199th Street, are also unrealistic and should be removed from the DEIS.

The two sites are poorly suited for job growth as they are both heavily parcelized and saturated with critical lands according to County GIS mapping below. Neither site appears on any known CREDC priority inventories or maps, and neither appears to have much property owner interest for employment development. The WSU site has no site-specific requests to develop for employment purposes, and the 199th Street only has two, accounting for just 5% of its overall land area.

WSU east expansion critical lands and parcelization



199th St. north expansion critical lands and parcelization



No rationale has been offered about the suitability of these sites for employment other than that they are currently zoned Urban Reserve, but this designation appears to have been made in 2007 or earlier, has not been reviewed in this update to see if it still makes sense almost 20 years later, and it can be easily changed now.

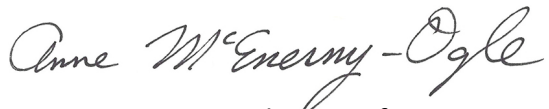
The “need” for any VUGA employment expansions at this or other locations created in response to recent staff changes to one of the VBLM employment model assumptions, in this case mixed use. The change received limited vetting and went beyond what recent development data justifies, with no explanation offered as to why. It also ignores other employment model assumptions which would effectively eliminate the need for the expansions.¹

Pitfalls from planning just by the numbers have been noted by this Council. In this case inappropriate numbers compounded by an inappropriate locational decision have created DEIS map designations which don’t make any sense on the ground in our view. We ask that the DEIS alternatives not include these two sites, and that the VBLM model assumptions revert to what the Council approved in its last VBLM review in May 2024.

¹ The mixed use assumption was changed to assume 90% of mixed use designated land would develop for residential purposes and 10% for employment, despite recent development data showing only an 80/20 split was occurring in practice. No explanation has been provided for the difference, or for the fact that zero vertically mixed-use buildings, which combine employment and residential uses on the same land, typically residential over first floor retail, are assumed in the VUGA for the next 20 years. The role of other VBLM employment assumptions that likely understate actual job growth capacity was also not considered – these include the assumption that only 4% of future job growth will be home-based, despite information in the record from former Washington Employment Security Department (WESD) SW Regional Economist Scott Bailey that the actual Clark County share is 20%, and “for land use planning purposes, is that the telecommuting numbers are unlikely to change much going forward”. The VBLM also uses jobs per acre density assumptions that have not been updated since at least 2007 and assumes there will little to no job growth in the next 20 years through redevelopment or filling up of existing employment buildings, even vacant ones.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Anne McEnerny-Ogle". The signature is written in a cursive, flowing style.

Anne McEnerny-Ogle, City of Vancouver Mayor