

From: [Jeffrey Delapena](#)
To: [Tim Trohimovich](#); [Cnty 2025 Comp Plan](#); [Jeffrey Delapena](#); [Cnty Community Planning](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: Comments on the land use alternatives for the Comprehensive Plan Update 2025-2045
Date: Wednesday, July 30, 2025 2:36:46 PM
Attachments: [image003.png](#)
[2025-07-30 FW Comments on Comp Plan Alts Clark Cnty PC.pdf](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good day, Tim,

Thank you very much for providing Futurewise's feedback related to the July 31st Planning Commission Work Session. I am forwarding to members of Community Planning Staff for their awareness.

These comments will be added to the Comprehensive Plan Index of Record and brought to the attention of the Planning Commission.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, July 30, 2025 2:29 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Cnty Community Planning <CommunityPlanning@clark.wa.gov>
Subject: Comments on the land use alternatives for the Comprehensive Plan Update 2025-2045

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Dear Staff and Planning Commissioners:

Enclosed please find Futurewise's comments on the land use alternatives for the Clark County Comprehensive Plan Update 2025-2045 for tomorrow's Planning Commission meeting. Please contact me if you require anything else.

Thank you for considering our comments.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



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July 30, 2025

Karl Johnson, Chair
Clark County Planning Commission
c/o Jeff Delapena, Program Assistant
Clark County Community Planning
PO Box 9810
Vancouver, Washington 98666-9810

Dear Council Chair Johnson and Planning Commissioners:

**Subject: Comments on the land use alternatives for the Clark County
Comprehensive Plan Update 2025-2045**

Sent via email: comp.plan@clark.wa.gov; jeffrey.delapena@clark.wa.gov;
communityplanning@clark.wa.gov

Thank you for the opportunity to comment on the land use alternatives for the Clark County Comprehensive Plan Update 2025-2045.

Summary

Futurewise has the following recommendations on the alternatives:

- First, Futurewise recommends adopting Alternative 2. At least one alternative should accommodate the selected population and employment projections within the existing urban growth areas and not convert natural resource lands to other uses. This alternative meets the requirements for a reasonable alternative in WAC 197-11-440(5)(b). So it must be included in the Draft EIS. Alternative 2 also meets community needs and, with the appropriate policies and development regulations, complies with the Growth Management Act and should be adopted in the comprehensive plan.
- Second, there is no need to expand the urban growth areas (UGAs) or pave over farm or forest land. The Washington State Supreme Court has held that an “UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the [State of Washington Office of Financial Management] OFM, plus a reasonable land market supply factor.”¹ A

¹ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008).



comparison of the total 2023-2045 housing unit needs in the *2025 Population, Housing and Employment Allocation – Issue Paper 5* with the “2023 VBLM Capacity” shows that existing capacity can accommodate or is within a few housing units of accommodating the planned housing growth.²

These recommendations are explained in more detail below.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests and water resources. We have members across Washington State including Clark County.

Futurewise supports Alternative 2 which accommodates the selected population and employment projections within the existing urban growth areas and not convert natural resource lands to other uses.

Futurewise recommends adopting Alternative 2 that accommodates the selected population and employment projections within existing urban growth areas (UGAs). Alternative 2 also meets community needs and, with the appropriate policies and development regulations, complies with the Growth Management Act and should be adopted in the comprehensive plan.

There is no need to expand the urban growth areas (UGAs). The Washington State Supreme Court has held that an “UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the [State of Washington Office of Financial Management] OFM, plus a reasonable land market supply factor.”³ A comparison of the total 2023-2045 housing unit needs in the *2025 Population, Housing and Employment Allocation – Issue Paper 5* with the

² Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 *2025 Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5 last accessed on July 29, 2025, at: https://clark.wa.gov/sites/default/files/media/document/2024-04/issue_paper_5_pop-emp_alloc_4_17_24.pdf and enclosed at the link on the last page of this letter with the filename: “issue_paper_5_pop-emp_alloc_4_17_24.pdf;” Clark County 2025 Allocation based on VBLM and HAPT Method A p. *1 last accessed on July 29, 2025, at: https://clark.wa.gov/sites/default/files/media/document/2024-02/Allocation%20Housing_Method%20A.pdf and at the link on the last page of this letter with the filename: “Allocation Housing_Method A.pdf.”

³ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008).





“2023 VBLM Capacity” shows that existing capacity can accommodate or is within a few housing units of accommodating the planned housing growth.⁴

Clark County Community Planning documented that “over half of the new units needed over the next 20 years will need to be affordable at 80% or less of the area median income.”⁵ The State of Washington Department of Commerce has documented that low-rise multifamily and mid-rise multifamily dwellings are needed to provide housing affordable to families and individuals with incomes between zero to fifty percent of the adjusted median income when subsidies are available in moderate cost communities.⁶ These housing types also provide housing affordable to families and individuals earning between 50 to 80 percent of the adjusted median income without subsidies in moderate cost communities.⁷ Accessory dwelling units can also provide housing for families and individuals earning 50 to 80 percent of the adjusted medium income in moderate cost communities.⁸ The cities and unincorporated urban growth areas will likely need to increase their capacity for low-rise multifamily and mid-rise multifamily dwellings to meet the affordable housing requirements. These zoning changes will increase the housing capacity in the cities and unincorporated urban growth areas. So, there is no need and no legal authority to expand the county’s urban growth areas.⁹

This alternative will also produce more compact urban growth areas (UGAs) saving taxpayers and ratepayers money. In a study published in a peer reviewed journal, John Carruthers and Gudmaundur Ulfarsson analyzed urban areas

⁴ Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 2025 *Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5;” Clark County 2025 Allocation based on VBLM and HAPT Method A p. *1.

⁵ Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 2025 *Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5.

⁶ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Dec. 4, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d517g509r389fomjpowh8isjpirlh> and at link on the last page of this letter with the filename: “HB 1220_Book2_Housing Element Update_230823 Final_updated 240920.pdf.”

⁷ *Id.*

⁸ *Id.*

⁹ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008).



throughout the United States including Clark County.¹⁰ They found that the per capita costs of most public services declined with density and increased where urban areas were large.¹¹ Compact urban growth areas save taxpayers and ratepayers money. This will also help achieve the Growth Management Act (GMA) requirements to plan for public facilities and transportation facilities.¹²

Compact urban growth areas also help conserve water long-term, reducing adverse environmental impacts. Large lots and low densities increase water demand, increase leakage from water systems, and increase costs to water system customers.¹³ So accommodating the same population and jobs in the existing UGA can reduce future water demands and costs.¹⁴ This will also help achieve the GMA requirements to conserve agricultural lands by protecting irrigation and stock water, to protect fish and wildlife habitat, and to plan for public facilities.¹⁵ Conserving water is even more important because Clark County will likely experience increasing droughts in the future. As the *Clark Regional Natural Hazard Mitigation Plan Volume 1—Planning Area-Wide Elements* documents:

Although there is still some uncertainty regarding climate change impacts on the water cycle, most current models project increases in precipitation in winter, spring and fall and decreases in precipitation in summer. This decrease in precipitation, coupled with higher average summer temperatures, may contribute to an increase in the frequency, severity and duration of droughts in the region (Dalton et al., 2013). More frequent extreme events such as droughts could end up being more cause for concern than the long-term change in

¹⁰ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 511 (2003) last accessed on July 30, 2025, at: https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise_UrbanSprawl.pdf and enclosed at the link on the last page of this letter with the filename: “Urban sprawl and the cost of public services.pdf.” Environment and Planning B is peer-reviewed. Environment and Planning B Submission guidelines p. *5 last accessed on Sept. 30, 2024, at: <https://journals.sagepub.com/author-instructions/EPB> and enclosed at the link on the last page of this letter with the filename: “Submission Guidelines_ EPB.pdf.”

¹¹ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003).

¹² RCW 36.70A.020(3), (12); RCW 36.70A.060(2); RCW 36.70A.070(3), (6).

¹³ United States Environmental Protection Agency, *Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies* pp. 3 – 5 (EPA 230-R-06-001: January 2006) last accessed on July 30, 2025, at: <https://www.epa.gov/smartgrowth/growing-toward-more-efficient-water-use> and enclosed at the link on the last page of this letter with the filename: “growing_water_use_efficiency.pdf.”

¹⁴ *Id.* at p. 8.

¹⁵ RCW 36.70A.020(8), (10), (12); RCW 36.70A.060(1); RCW 36.70A.070(3).

temperature and precipitation averages. According to the Washington State Department of Ecology, Washington has experienced unusually dry periods almost every year since 2000 (Washington Department of Ecology, 2007).¹⁶

Compact urban growth areas that conserve water will help counteract these increased droughts.

Urban growth areas encourage housing growth in cities and protect rural and resource lands and reduce adverse environmental impacts. To examine the effect of King County, Washington's urban growth areas on the timing of land development, Cunningham looked at real property data, property sales data, and geographic information systems (GIS) data. These records include 500,000 home sales and 163,000 parcels that had the potential to be developed from 1984 through 2001.¹⁷ Cunningham concluded that "[t]his paper presents compelling evidence that the enactment of a growth boundary reduced development in designated rural areas and increased construction in urban areas, which suggests that the Growth Management Act is achieving its intended effect of concentrating housing growth."¹⁸ He also concluded that by removing uncertainty as to the highest and best use of the land that it accelerated housing development in King County.¹⁹ This study was published in a peer reviewed journal.

Reducing development in rural areas and natural resource lands can have significant environmental benefits, such as protecting water quality, working farms and forests, and fish and wildlife habitat.

Urban growth areas help keep our existing cities and towns vibrant and economically desirable and reduce environmental impacts. In a peer reviewed study, Dawkins and Nelson found that the city of Yakima's share of the

¹⁶ Clark Regional Emergency Services Agency, *Clark Regional Natural Hazard Mitigation Plan Volume 1—Planning Area-Wide Elements* p. 8-8 (Approved: March 31, 2023) last accessed on July 30, 2025, at: <https://cresa.wa.gov/documents/CR-Natural-Hazard-Mitigation-plan-v1-2023.pdf> and enclosed at the link on the last page of this letter with the filename: "CR-Natural-Hazard-Mitigation-plan-v1-2023.pdf."

¹⁷ Christopher R. Cunningham, *Growth Controls, Real Options, and Land Development* 89 THE REVIEW OF ECONOMICS AND STATISTICS 343, 343 (2007) at the link on last page of this letter with the filename: "Cunningham Growth Controls, Real Options, and Land Development.pdf."

¹⁸ *Id.* at 356.

¹⁹ *Id.* at 356 – 57.

metropolitan housing market increased after adoption of the GMA.²⁰ This and other measures showed that center cities in states with growth management laws attract greater shares of the metropolitan area's housing market than center cities in states without growth management aiding center city revitalization.²¹ This reduces the tendency to move out of existing center cities. This will also help achieve the GMA goals and requirements to focus growth in existing cities and towns, conserve agricultural lands, protect rural character, protect the environment, provide for housing, and to plan for public facilities.²²

Urban growth areas promote healthy lifestyles. Aytur, Rodriguez, Evenson, and Catellier conducted a statistical analysis of leisure and transportation-related physical activity in 63 large metropolitan statistical areas, including Seattle, Tacoma, and Spokane from 1990 to 2002.²³ Their peer reviewed study found a positive association between residents' leisure time physical activity and walking and bicycling to work and "strong" urban containment policies such as those in Washington State.²⁴ Focusing growth in existing UGAs will help achieve the GMA requirements to promote physical activity, reduce per capita vehicle miles traveled, and to provide for active transportation choices.²⁵

Compact urban growth areas, because they allow shorter automobile trips and encourage walking, bicycling, and transit use, reduce greenhouse gas emissions, such as CO₂. In Washington State, transportation activities are the largest contributor to greenhouse gas emissions, generating 39 percent of our state's global warming causing gases.²⁶ The Washington Climate Advisory Team

²⁰ Casey J. Dawkins & Arthur C. Nelson, *State Growth Management Programs and Central-City Revitalization*, 69 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 381, 386 (2003) at the link on the last page of this letter with the filename: "State Growth Management Programs and Central-City Revitalization.pdf."

²¹ *Id.* at 392 – 93.

²² RCW 36.70A.020(1), (8), (10), (12); RCW 36.70A.060(1); RCW 36.70A.070(2), (3), (5); RCW 36.70A.110.

²³ Semra A. Aytur, Daniel A. Rodriguez, Kelly R. Evenson, & Diane J. Catellier, *Urban Containment Policies and Physical Activity: A Time-Series Analysis of Metropolitan Areas, 1990–2002* 34 AMERICAN JOURNAL OF PREVENTIVE MEDICINE 320, 325 (2008) last accessed on July 30, 2025, at: https://scholars.unh.edu/cgi/viewcontent.cgi?article=1001&context=hmp_facpub and enclosed at the link on the last page of this letter with the filename: "Urban Containment Policies and Physical Activity A Time_Series An.pdf."

²⁴ *Id.* at 330.

²⁵ RCW 36.70A.070(1), (6).

²⁶ State of Washington Department of Ecology, Washington's greenhouse gas inventory webpage last accessed on July 30, 2025, at: <https://ecology.wa.gov/Air-Climate/Climate-change/Greenhouse-gases/2017-greenhouse-gas-data>; *Leading the Way: A Comprehensive Approach*

(CAT) wrote that we must reduce the amount of driving we do if we are going to meet the state's greenhouse gas emissions requirements.²⁷ A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.²⁸ Nationally, densities must increase on average by 19 percent.²⁹ The paper concluded this can be achieved by a "mix of small apartment buildings and modest single-family homes"³⁰ This will also help achieve the GMA requirements to protect the environment, reduce per capita vehicle miles traveled, and reduce greenhouse gas pollution.³¹

Not converting natural resource lands to other uses protects local jobs and local food and complies with the GMA's legislative mandate for the conservation of natural resource lands. Conserving farm and forest land retains and increases jobs, supports the creation and maintenance of small local businesses, and increases access to fresh local food and food security.³²

In addition, the Washington State Supreme Court has held that "[w]hen read together, RCW 36.70A.020(8), .060(1), and .170 evidence a legislative mandate for

to Reducing Greenhouse Gases in Washington State Recommendations of the Washington Climate Advisory Team p. 57 (Feb. 1, 2008) last accessed on July 30, 2025, at:

<https://fortress.wa.gov/ecy/publications/SummaryPages/0801008b.html> and enclosed at the link on the last page of this letter with the filename: "0801008b.pdf."

²⁷ *Leading the Way: A Comprehensive Approach to Reducing Greenhouse Gases in Washington State Recommendations of the Washington Climate Advisory Team* p. 57 (Feb. 1, 2008).

²⁸ Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, 19122 (Aug. 11, 2020) last accessed on July 30, 2025, at: <https://www.pnas.org/content/117/32/19122> and enclosed at the link on the last page of this letter with the filename: "goldstein-et-al-2020-the-carbon-footprint-of-household-energy-use-in-the-united-states.pdf." PNAS is a peer-reviewed journal. PNAS Author Center last accessed on Sept. 30, 2024, at: <https://www.pnas.org/author-center> and enclosed at the link on the last page of this letter with the filename: "Instructions for Authors - PNAS.pdf."

²⁹ Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, 19128 (Aug. 11, 2020).

³⁰ *Id.*

³¹ RCW 36.70A.020(10), (14); RCW 36.70A.070(1), (5), (9).

³² Julia Freedgood, Mitch Hunter, Jennifer Dempsey, and Ann Sorensen, *Farms Under Threat: The State of the States* p. 4, p. 6, p. 9 (Washington, DC: American Farmland Trust, 2020) last accessed on July 29, 2025, at: <https://farmlandinfo.org/publications/farms-under-threat-the-state-of-the-states/> and enclosed at the link on the last page of this letter with the filename: "AFT_FUT_StateoftheStates_rev.pdf."

Re: Comments on the land use alternatives for the Clark County Comprehensive
Plan Update 2025-2045
July 30, 2025
Page 8

the conservation of agricultural land.”³³ Since these provisions also apply to forest lands of long-term commercial significance, both the former Central Puget Sound Growth Management Hearings Board (CPSGMHB or Central Board) and Western Washington Growth Management Hearings Board (WWGMHB or Western Board) have concluded that there is also a forest resource lands conservation imperative.³⁴

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email: tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich
Director of Planning & Law

Enclosures at this link:

<https://futurewiseorg.sharepoint.com/:f:/g/EgiQ5lXMaz1Bi1nkXcodtWkB9f6VS6-9rluwh8-ggMsWAA?e=KlMaBY>

³³ *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 142 Wn.2d 543, 562, 14 P.3d 133, 143 (2000).

³⁴ *Forster Woods Homeowners' Association et al. v. King County*, Central Puget Sound Growth Management Hearings Board (CPSGMHB) Case No. 01-3-0008c, Final Decision and Order (Nov. 6, 2001), at *12 of 27; *Town of Friday Harbor, Fred R. Klein, John M. Campbell, Lynn Bahrych, et al. v. San Juan County*, WWGMHB Case No. 00-2-0062c, Order on Compliance and Invalidity Re: Resource Lands Redesignation (March 28, 2002), at *3 of 7, 2002 WL 599680 p. *3.