

From: [Rebecca Messinger](#)
To: [Cnty 2025 Comp Plan](#)
Subject: FW: City of Vancouver comment letter on VUGA employment mapping in the County Comprehensive Plan update
Date: Monday, September 15, 2025 3:21:21 PM
Attachments: [25 09 08 letter to CCC on VUGA mapping.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Please see the attached letter from Bryan Snodgrass, City of Vancouver.

Thank you!



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

564-397-4305



From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Tuesday, September 9, 2025 5:05 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 on VUGA employment mapping in the County Comprehensive Plan update

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.

Attached please find a comment letter from the City of Vancouver for distribution to the County Council, and posting on the project site. Thanks very much.



DATE: September 8, 2025

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

FROM: City of Vancouver

RE: Vancouver Urban Growth Area employment mapping and Comprehensive Plan Update

In light of recent information, we write to you about VUGA employment mapping proposed by the County as part of the Comprehensive Plan update, and request that you consider either making changes in the County Draft Environmental Impact Statement (DEIS) mapping, or alternatively empower County staff to begin making the necessary adjustments to be able to do so in the Preferred Alternative. We believe this is particularly timely given changes to the County Comprehensive Plan update schedule, growing community opposition, and recent discussions on future annexation.

We thank you for inviting City representatives to your recent workshop to discuss annexation and your support for exploring potential scenarios for long-term annexation of the unincorporated Vancouver UGA. Considerable discussion will be needed going forward with the community, and between our organizations. For either jurisdiction, providing services to the VUGA is an imposing challenge. Annexation plans won't be finalized as part of the Comprehensive Plan update now in its homestretch, but determining if and how the VUGA will grow is part of this update cycle, and has significant implications for annexation.

Though understandable, the latest County update schedule moving DEIS publication dates back may make this more challenging, as many County update decisions will have to be made in a very tight timeframe in spring 2026 to avoid exceeding legal deadlines even further than already necessary. However, moving the DEIS publication date back does provide an opportunity now to address some key unresolved VUGA employment mapping issues, or at least to make progress and provide direction on them so that they can be readily resolved in the Final EIS, and the final adopted Comprehensive Plan.

Please consider the following:

1. Recent VUGA expansions proposed by the County for employment do not appear justifiable from a policy or legal perspective, have little to no support from property owners or stakeholders, and based on past experience would likely be converted to residential uses in the future if brought into the boundary.

WSU east expansion critical lands
and parcelization



199th St. north expansion critical lands
and parcelization



Source: Clark County Maps On Line

The County's proposed 200-acre Business Park VUGA expansion abutting WSU has been subject to recent widespread community opposition as summarized in a [July 10 Columbian article](#), and through many recent [comments submitted](#) to the County update website, and comments at the County EIS open houses. As the article and comments note, the area is heavily parcelized, served by narrow and winding roads, and contains significant environmental constraints. No site specific requests for employment zoning have been submitted by local property owners, and the site has not been identified in any CREDC priority employment inventories.

The proposed 199th Street expansion of approximately 150 acres does not appear to have drawn local opposition to date, but has similar constraints limiting its utility for future employment, including its absence from CREDC priority inventories, and the fact that it is heavily parcelized and contains significant environmentally critical lands, as shown on the above map. Site specific requests account for only 14% of its area, and it is not clear how many of these requests have actual plans for employment development.

Both sites appear to have been chosen only because they have Urban Reserve Overlay zoning, which appears to date back to the 2007 Comprehensive Plan update or earlier. In our experience in past updates, Urban Reserve designations were applied as an afterthought, in this case probably only because they were located near to WSU and I-5, respectively. There was

likely no analysis of the actual conditions on the ground in these areas or evaluation of their realistic suitability for economic development. The Council can remove these overlay designations now, if it finds that there was insufficient analysis at the time of their original application, or that times have changed in the past 18 years. No evidence has been provided that property owners purchased their land because of the overlay designation – indeed, no property owners at all appear to support the employment designation in the area near WSU, and only a fraction of area property owners are in support of the designation near 199th Street.

Neither of the proposed expansions are needed to meet VUGA employment targets by reasonable accounting. There were no projected VUGA employment “deficits” or any proposed VUGA boundary expansions in the original County calculations and mapping in 2023. The numerical “deficit” driving these two recent VUGA expansions was only created when the County changed an assumption for mixed use development in the VUGA. The change was made with little consultation, well after the Buildable Lands Project Advisory Committee made its original recommendations, and well after the County Council formally adopted its set of VBLM assumptions.

There appear to be several inaccuracies in the analysis driving the newly created VUGA jobs “deficit”:

- The VBLM model change was to assume that 90% of mixed use zoned land would develop for housing and 10% for employment, but by the County’s own admission, recent development on the ground has occurred at an 80/20 split, not 90/10.
- A 90/10 assumption, or any other split adding to just 100%, assumes all mixed-use designation land would be used only for housing or only for employment, but never for both as occurs with any mixed-use building. Assuming there will be *zero* new mixed-use buildings in the VUGA *mixed use zone* over the next 20 years is not credible.
- The VUGA employment deficit created by the changed mixed use assumption exacerbates other outdated model assumptions that would create a VUGA jobs surplus if they were updated to be more accurate. The VBLM maintains a longstanding pre-pandemic assumption that only 4% of future countywide job growth will be home based, despite testimony from then Washington Employment Security Department Economist Scott Bailey estimating that in Clark County the figure is likely to be 20% (see attached). The VBLM employment model assumes little to no VUGA job growth will occur in the redevelopment of existing buildings, or the filling up of existing buildings,

even vacant ones. The VBLM assumptions for employment density are unchanged since 2007.¹

The proposed VUGA employment expansions stemming from these inaccuracies will have negative practical consequences

- UGA expansions that are driven by outdated or inaccurate development assumptions creates significant legal exposure that benefits no one.
- Designation of the expansion areas would likely render existing rural homesites as non-conforming, without subsequent job growth at the WSU expansion area and only limited job growth at the 199th Street expansion area. Future requests for conversions to single family residential zoning would be likely in both areas, similar to what has happened in other previous VUGA expansion areas near 179th Avenue that were originally justified based on employment needs but then later converted to residential. Because of critical lands and parcelization throughout both areas, development that does occur for either housing or jobs would likely be piecemeal and disjointed, and more expensive to serve.

This County Council has rightly observed that too much of planning under the Growth Management Act is driven by numbers. In some cases that is unavoidable, but in this case it is entirely avoidable. We would respectfully ask that you not go forward with late-in-the-game employment expansion proposals of the VUGA at inappropriate sites with little to no community or stakeholder support, *all driven by an inaccurate technical analysis creating an artificial need that would not exist under more complete accounting.*

Please empower County staff to resolve this issue through a modest adjustment to the VBLM assumptions for mixed use, home-based work, and/or employment lands redevelopment and refill, in order to reflect actual recent development data. Modest corrections in any of these areas would result in a more accurate capacity assessment, and eliminate the need for these VUGA employment expansions which make no sense on the ground.

¹ Little to no rationale has been provided for most of these bulleted issues raised, and most were never originally addressed by the Buildable Lands Advisory Committee, which focused on housing with limited time to address employment. The committee did not vote on home based work assumptions, employment redevelopment outside Vancouver city limits, or the assumed split in mixed use zones or existence of mixed use buildings in mixed use zones. Even on the most basic employment assumption of jobs per acre, the committee voted to retain the original assumptions without any new development data, which was not available.

Regarding the remote work assumption, we believe any job a local resident is able to fulfill from their home is one less that needs to be provided by the local economy, regardless of the home base of the employer. Nonetheless, if the Council wishes to distinguish Scott Bailey's 21% estimate of future home based work between remote workers living in Clark County and working for a local employer vs those living here and working for employers located outside the County, his memo suggests an even split, which would amount to 10.5%. There is no technical or legal basis for maintaining the outdated assumption of 4% in the face of recent expert opinion.

2. Within the existing VUGA, DEIS mapping of commercial or employment zoning is lacking in various areas where local residents most need them, as required by GMA and existing Countywide Planning Policies.

All County DEIS alternatives as thus far mapped show wide swaths of single family zoning inside the VUGA located *many miles* from the nearest shopping or employment opportunities, requiring local residents to engage in long vehicle trips to reach basic and essential services.

We are not suggesting that these areas should or could develop like those in cities or more centralized urban areas. However, the failure of the DEIS alternative maps to take even basic small steps to include at least some commercial or employment zoning near existing exclusively residential areas that completely lack them will disadvantage those residents for the upcoming 20 years and ensure that the VUGA remains very costly to serve for any government.

The current DEIS mapping is also likely inconsistent with GMA as well as longstanding County policy. It is inconsistent with [HB 1181](#) climate mandates to lower per capita Vehicle Miles Travelled (VMT), and is inconsistent with longstanding [Countywide Planning Policy 1.4.1](#) which calls for locating frequently used commercial activities near residential areas. By proposing expansions of the VUGA without first considering existing options within it, proposed VUGA employment mapping also violates [WAC 365-196-310 \(4\)\(b\)\(iv\)](#). On a practical level, 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 far longer drives for shopping or employment. One year ago on August 16, 2024 Vancouver staff provided [a letter](#) identifying 17 potential locations for additional commercial or employment zoning in the existing VUGA. None of these were included in the County DEIS.

We respectfully request that the County Council engage on these issues before the spring 2026 adoption rush, and empower County staff to explore changes that address them, with City staff as needed. Small steps in a handful of areas can make a big difference towards making the existing VUGA a more livable area consistent with state and local standards.

Thank you for the opportunity to comment. We look forward to continued dialogue on the issues raised here, and on planning and implementation issues throughout the Vancouver UGA and City of Vancouver.

Sincerely,

A handwritten signature in dark ink, appearing to read "Erik W. Paulsen".

Erik Paulsen, Mayor Pro-Tem, City of Vancouver

ATTACHMENT: Former Washington ESD Regional Economist Scott Bailey's estimates for future remote work in Clark County– highlights added

From: Scott Bailey <pdxsdb@gmail.com>

Sent: Monday, February 12, 2024 2:10 PM

To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>

Cc: Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Bryan Snodgrass <Bryan.Snodgrass@cityofvancouver.us>

Subject: Re: Remote work assumptions

Oliver, Jose, Bryan, sorry to be slow to respond. What I was trying to say in the memo was:

1. Remote work shifted from 8% of Clark County workers in 2019 to **21% in 2021**, an increase of 13%.
2. The percent of Clark County workforce working out of state declined by 6% over that same period.
3. Therefore the 13% increase in **remote work was likely almost evenly split**, with 6% of those formerly commuting to an out of state workplace now telecommuting, and about the same formerly driving to a workplace in the county now working at home.

More importantly, I think, **for land use planning purposes, is that the telecommuting numbers are unlikely to change much going forward**. The 2022 number (available after the memo was written) put telecommuting at 20%, a slight decline, but probably well within the margin of error for the ACS.

I'm in Vancouver teaching at Clark on Tuesdays and Thursdays, I'd be happy to meet with any or all of you on those afternoons (1:30 pm or later).

Scott

971-219-7727