

From: [Jeffrey Delapena](#)
To: [Bryan Snodgrass-Vancouver](#); [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#)
Cc: [Chad Eiken-Vancouver](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: FW: City of Vancouver comment on Clark County DEIS
Date: Monday, December 1, 2025 9:48:07 AM
Attachments: [25 11 29 COV comments on County DEIS .docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Bryan,

Thank you for submitting the City of Vancouver's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded these comments to additional Staff and will enter them into the Index of Record.



Jeff Delapena
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From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Saturday, November 29, 2025 6:00 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Eiken, Chad <Chad.Eiken@cityofvancouver.us>
Subject: City of Vancouver comment on Clark County DEIS

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attachments unless you recognize the sender and know the content is safe.

Attached please find comments on behalf of the City of Vancouver on the Clark County DEIS for the 2025 countywide Comprehensive Plan update. Thank you very much.



DATE: November 29, 2025

TO: Clark County Community Planning, EIS Comments, PO Box 9810, Vancouver, WA 98666- 981

FROM: City of Vancouver

RE: City of Vancouver Comments on the Clark County Draft Environmental Impact Statement (DEIS) for the 2025 countywide Comprehensive Plan update

Thank you for the opportunity to comment on the [countywide DEIS](#), which has implications for the Vancouver Urban Growth Area and City of Vancouver. We very much appreciate the clear, well organized and readable narrative and format of the document which allows for easy review. Some observations:

- 1. The DEIS confirms that new plans being proposed by the Cities and Clark County in Alternative 2 have more than enough room in existing UGA boundaries to accommodate the aggressive countywide growth forecasts chosen by the Council for this update.** The DEIS reports that under County VBLM assumptions Alternative 2 has surplus capacity for 38,000 more countywide housing units and 3,000 more jobs than are needed to accommodate the 20-year countywide growth targets chosen by the County. (p132)
- 2. Despite market trends and state laws emphasizing greater density and affordability, the DEIS also confirms that Alternative 2 includes numerous opportunities for single-family housing and home ownership, and will not create a large inventory of undeveloped land.**
 - The DEIS reports (p111) that two thirds of existing countywide housing units are detached single family homes, most of which will still be here 20 years from now.
 - Recent development proposals include several small lot subdivisions and cottage clusters providing opportunities for ownership.
 - Recent statutory changes to allow unit-lot subdivisions, and lot splitting, will further enhance opportunities for single family ownership in the future.

- Going forward, the DEIS shows Alternative 2 provides more than three times as much countywide land zoned for urban low density than zoned for urban high density and mixed use combined. (p127).
- The emphasis in Vancouver plans, and those of other jurisdictions as we understand them, is to allow higher densities and more affordable housing, but not to fully mandate it. New state laws require Vancouver, Camas and Washougal to allow middle housing in single family zones, but not to require it. Vancouver envisions *minimum* densities of 8 units per acre in its Low Scale Neighborhood designation, and 16 units per acre in its Medium Scale Neighborhood designation, both of which can be achieved through single family development.

3. The DEIS analysis of Alternative 3 appears to significantly underestimate its impacts.

Alternative 3 includes all site specific UGA expansion requests, including those that aren't contiguous to existing boundaries. Legally expanding boundaries outward to reach the non-contiguous expansion requests requires also including intervening properties in order to have a single contiguous UGA. The DEIS did not include the intervening properties in Alternative 3, and correcting this would increase total UGA expansions, likely well beyond the 2,500 acres countywide currently reported in the DEIS for Alternative 3, and increase impacts accordingly.

Impacts for Alternative 3, and Alternative 2, also appear to be significantly underestimated because of questionable growth assumptions used which bypass the County's own VBLM capacity estimates. The DEIS reports that the alternatives have widely varying land capacities to accommodate growth – Alternative 1 has room for 99,000 new housing units countywide, while Alternative 2 has room for 142,000 new units and Alternative 3 has room for 149,000 new units (p 124, 128,135). Despite these large differences, for analytical purposes the DEIS assumes each of the three alternatives will produce the exact same amount of future growth, 104,000 new housing units (p5). This has led to very unusual findings. The DEIS reports on page 151 that Alternative 3, with its large scale UGA expansions, would result in *16,000 fewer* vehicle person trips than Alternative 1, the No Action Alternative, despite Alternative 3 having room for *50,000 more* housing units according to the VBLM. Other traffic impact model findings including vehicle miles travelled on page 151 also appear unusual, and some of those findings are cited in the climate section. Going forward, we recommend the comparative analysis in the Final EIS between the Preferred and No-Action Alternatives reflect their differing growth capacities, rather than continuing to assume large scale UGA expansions will produce no more future growth than taking no action.

This is not intended to criticize the DEIS, but rather to dispel any notion that in a popular destination like Clark County, large scale UGA expansions or upzones can somehow be undertaken without leading to higher levels of growth and more impacts. Fortunately, various conclusions in the DEIS disregard these inaccurate technical findings and get the big picture right, noting that large increases in land supply will in fact mean greater impacts. ¹

4. **The DEIS further indicates that the two recently proposed VUGA employment expansions are inappropriate and inconsistent with the GMA.** As noted previously, both the WSU and 199th Street sites have extensive parcelization and limited interest from local property owners in developing for employment. DEIS maps on pages 246-67 further demonstrate the extent of critical lands as both sites appear to show high levels of archaeological probability, mapped wetlands and wetland soils, streams, and limitations on commercial construction.

The DEIS raises further questions about the mathematical need for these expansions, which was the reason they were included. The sites were added to the VUGA in 2024 because of newly created deficit in VUGA employment lands capacity, but that capacity estimate was based on erroneous assumptions that effectively there would be no future mixed use buildings on VUGA land designated for mixed use development, and that home-based work

¹ The transportation narrative on pages 157-8 suggests on that Alternative 3 has lower traffic impacts than the No Action Alternative 1 because it has a better balance of residential and employment uses. The data doesn't support this, however:

- a. Page 134 shows that only a limited amount of employment land was added to Alternative 3 vs Alternative 1, with the exception of Camas, where employment land was added by UGA expansions at the edge of the urban area. Similarly, employment land was reduced inside the existing VUGA boundary, which was then used as part of the rationale for expanding the VUGA.
- b. Page 151 shows that Alternatives 1 and 3 identical levels of transit share, and only a negligible difference in active transportation share, not what would be expected if Alternative 3 had a better balance of uses big enough to result in 16,000 fewer vehicle trips than Alternative 1.
- c. Page 151 also shows that Alternative 3 only shows 1200 more person trips than Alternative 2, despite the fact that Alternative 3 has 1,500 more acres of UGA expansions than Alternative 2, and both have similar mixing of uses in existing urban areas. The unusual assumption that all Alternatives will have the same level of growth appears to be masking likely significant differences in impacts, even when zoning in existing urban areas is similar.

DEIS conclusions ignore the above and acknowledge that in fact larger land supplies will result in greater impacts on page 18, stating that *"the difference in impacts between the alternatives is based primarily on the location and size of UGAs and zoning changes proposed to accommodate future residential, commercial, and industrial growth"*. Actions listed on page 12 to mitigate transportation impacts include a call for *"Reducing the amount of UGA expansion or the intensity of growth in outlying urban growth areas, or at a minimum, developing a mechanism to delay growth in certain areas until funding is available."*

would only account for 4% of countywide employment. The DEIS now reports on page 146 that the latest actual countywide home based work figure is 18.7%, more than four times as much as assumed in the capacity analysis.

The DEIS also confirms that the recent need for VUGA employment land wasn't just created by late changes to the VBLM, but also by a removal of employment lands from the current VUGA. Page 127 shows that the VUGA under Alternative 2 has 288 acres more employment land than current (No Action Alternative 1), yet the VUGA employment expansions accounted for 356 acres of this gain, indicating around 68 acres of employment land appears to be proposed to be removed from the current VUGA. WAC [365-196-310 \(4\)\(b\)\(iv\)](#) calls for first considering increase capacities of exiting urban areas before considering UGA expansions. Instead, the existing VUGA was considered, and employment capacities were *decreased* by both removing employment land and changing capacity modelling assumptions, all while simultaneously bypassing requests to add employment lands at any of 17 different existing VUGA sites identified by the City of Vancouver.

Those 17 sites were identified not to alleviate pressure on VUGA employment expansions, but rather to comply with [Countywide Planning Policy 1.4.1](#) which calls for locating frequently used commercial activities near residential areas (most of the 17 sites are located in exclusively single family areas a mile or more from the nearest shopping or employment opportunity) and to comply with new GMA [climate requirements](#) to reduce vehicle miles travelled per capita. It is not clear how the employment land mapping in the existing or expanded VUGA is consistent with the GMA.

5. Successfully completing the Comprehensive Plan update will require the County to adjust the growth allocations among the jurisdictions. Earlier in this update process countywide growth forecasts were chosen, and the County then divided these up among the various jurisdictions largely according to how much capacity each jurisdiction had – the allocation essentially “filled” each jurisdiction’s capacity. Fast forward 1-2 years to the present, and the Cities as well as Clark County have proposed various zoning changes in their exiting urban areas in order to comply with new state laws, or for other reasons. These zoning changes, and the passage of time has altered capacities, but the formal allocations have remained unchanged. If new Comprehensive Plans were to be adopted today, Washougal would be forced against its wishes to expand its UGA to meet its employment allocation. A potential solution agreeable to Vancouver and Washougal staff is to avoid this by shifting a small share of Washougal’s employment allocation to the City of Vancouver because it has more employment land than we need according to the County VBLM. This change can be made with County Council approval, and without reopening the VBLM. Similarly, a shift to

move a small share of the VUGA jobs allocation to the City of Vancouver to avoid the two inappropriate VUGA employment expansions also requires County Council approval. Other shifts are needed among the small cities. Without adjustment to allocations, many UGAs might be forced to shrink because of excess residential capacity. The cities will explore opportunities to craft a collective allocation adjustment proposal, but this can only make sense if we all understand that the current math will need to be adjusted.

Thank you again for the opportunity to comment on the Clark County Draft Environmental Impact Statement on behalf of the City of Vancouver. Please do not hesitate to contact me if you should have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Snodgrass". The signature is fluid and cursive.

Bryan Snodgrass, Principal Planner

Community Development Department

bryan.snodgrass@cityofvancouver.us