

From: [Jude Wait](#)
To: [Sue Marshall](#)
Cc: [Matt Little](#); [Wil Fuentes](#); [Ann Foster](#); [Mo McKenna](#); [Dillon Haggerty](#); [Oliver Orjiako](#); [Bart Catching](#); [Jose Alvarez](#); [Jenna Kay](#); [Jeffrey Delapena](#); [justin@burgerfamilyfarm.com](#); [Joe Zimmerman](#); [Glen Yung](#); [Diane Dempster](#); [hollyhansenagcomm@gmail.com](#); [zoppenheimer@clarkcd.org](#); [O'Dea, JUSTIN](#); [rbarca@wolfind.com](#); [matthew.cornwell@clarkcountyfoodbank.org](#); [Edward Hamilton Rosales](#); [Hector Hinojosa](#); [Tim@futurewise.org](#)
Subject: Ag Advisory Commission "public" comment Additions
Date: Monday, December 15, 2025 10:26:48 PM
Attachments: [Wellsave-Wait-1-pg Summary of Other Findings to Protect Ag.pdf](#)
[futurewise DEIS-Alt-1 Nov 26, 2025 comments.pdf](#)
[FOCC Alt 1 DEIS comments 11-26-2025.pdf](#)
[Futurewise Scoping DEIS public-comments Jan 2025.pdf](#)

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Dear Agricultural Advisory Commission etal.

You are *standing on solid grounds* with your recommendation to the Council "**.. that there be no dedesignation of current agriculture land until there is a process for designation of agricultural land.**" I hope you provided that for their consideration under the DEIS comment process. Herein we provide further evidence supporting the recommendation.

I reviewed the [extensive] public comment posted for your Ag Commission meeting 12-17, and found 2 current items that are NOT there, BUT only found in the DEIS comments record - herein attached for your convenience. In addition I have attached/reference a DEIS scoping comment. All pertain to your role in making recommendations and review of the Ag Lands Study report, which could affect the County Council's decision on choosing a preferred alternative.

I have summarized the key takeaways from the DEIS comment documents attached in the one-page attachment. I also listened to your November meeting and the [very illuminating] Planning Commission work session on the Ag Study.

My comments on the DEIS are already in your public comments PDF (and I emailed this subset of you directly). I will reiterate 2 comments on the Ag Study. Both have easy remedies we suggest you / County staff pursue / request.

1- The agricultural/farm economy is still significant and needs to be considered in data, ag analyses, reporting, and planning for the future. I submitted a sample of indicators from the Ag Census:)

2- The Study report apparently failed to include qualitative data gathered in interviews, which undermines trust, and precludes the potential for a broader diversity of perspectives, likely to reflect dozens of farms and stakeholders NOT otherwise represented on the Commission or selected interviewees. Other voices matter:)

In conclusion, your input and legacy as the inaugural Agricultural Advisory Commission are important. I believe your role is to support agricultural land and viability interests, and we appreciate your efforts.

| respectfully submitted,

Jude Wait, Ph.D.
Wellsave LLC
Farm and Food Justice Network co-director

From: [Jeffrey Delapena](#)
To: [Ann Foster](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Comments on the DEIS
Date: Wednesday, November 26, 2025 11:28:15 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Ann,

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

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



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Ann Foster <annfoster5093@gmail.com>
Sent: Wednesday, November 26, 2025 11:15 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Subject: Comments on the DEIS

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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.

On behalf of Friends of Clark County (FOCC) , I am pleased to have the opportunity to submit our comments on the draft of the SEPA environmental impact statement as presented by Community Planning to Clark County on October 1, 2025. Although there may be more instances in which more comment could be appropriate, we selected 4 of the Comp Plan Elements that we feel made the most significant impact on the overall environment and health of Clark County, and fit with FOCC's values and mission. In all comments below, Friends of Clark County advocates for Alternative 1 of the existing alternatives, which is the No-Change Alternative. Although our organization is not averse to change, Alternatives 2 and 3 consist of plans that adversely impact Clark County, largely because of the proposals by some cities to annex high-quality agricultural lands.

FOCC's comments are below:

ELEMENT: WATER

Compiled by Richard Dyrland. Retired USA/USFS Regional Hydrologist, Al O'Connor, Retired Army Corps of Engineers Geologist

In regards to the DEIS section on "WATER," there is a considerable amount of data and information that shows the State of Washington and particularly Clark County, have a need to follow through on better protection, compliance and enforcement of both surface runoff and groundwater management, including ongoing un-licensed in-stream summer water withdrawals, un-monitored pollution in the upper parts of watersheds, and resulting higher stream temperatures during reduced streamflow. In addition,, Washington State has recommended more use of the Critical Aquifer Recharge Areas (CARA) Protection System to protect groundwater recharge areas.

Building on this concern, the continuing direct and/or indirect loss of wetlands that support stream and groundwater flow and recharge, needs to be greatly reduced or no longer allowed.

Despite all the new "Advanced Technologies" available and applied to "New Plans" completed or old ones updated, --- without County Leadership and Staff commitment to Compliance and Enforcement of these new Policies and Clark County Departments Operational Programs, the result will be more ineffective changes and implementation commitments that would not prevent serious and costly long-term unmitigatable water resources impacts.

A clear example of these risks can be seen in the potential of adding more gravel and rock mining sites at locations such as the proposed Chelatchie Bluff Mine where data shows a high risk of impacting surface and groundwater recharge, including degradation of numerous downstream domestic wells and the Threatened and Endangered Listed recovering salmonid populations below the mining site which affects all of the Cedar Creek Watershed.

Furthermore, documents submitted to Clark County by retired Army Corp of Engineers Geologist Al O'Connor show that gravel and rock barged down the Columbia River (a source now used By Portland) is of high quality, is economically feasible, and has a low environmental impact at the source sites in the old Missoula Flood Terraces on the Columbia River.

Turning to the topic of, "Mitigation" included early on in the document is greatly appreciated. It was clearly explained that Mitigation has real limitations, and not all direct or associated on or off-site negative impacts and effects of a policy or type of action can be mitigated effectively. Moreover, if the social/economic, or physical tradeoffs and opportunity costs that can't be effectively mitigated, then the proposed Plan or Action may not be acceptable, --- particularly in the case of achieving full compliance with GMA and environmental rules and regulations. For instance, it is reported that Stormwater Mitigation has failed 90% of the time in Puget Sound. It has failed in some areas of Clark County also.

CONCLUSION

Considering all these factors, of the three Comp Plan DEIS Alternatives, my conclusion is that Comp Plan DEIS Alternative-1 best meets projected future growth needs, that can be implemented with the lowest achievement level of Social, Economic, and Environmental tradeoffs, impacts, and opportunity costs and still meet the Goals and Objectives of Alternative-1.

ELEMENT: LAND USE AND SHORELINE

Housing

Compiled by Jim Byrne, Retired Fish And Wildlife Biologist, And Teresa Hardy, Sierra Club

Alternative 1

Conversion of prime agricultural land to urban uses under all alternatives except Alternative 1 is unwarranted. Alternative 1 would preserve the rural character of the county, enhance the sustainability of small-scale resource uses, and enrich our other values- recreational, scenic, historic, and environmental—that are associated with these lands. It would also be the best option to ensure Clark County's population is protected from worsening climate conditions.

Alternative 2

Under Alternative 2, the urban growth areas would be expanded by about 1,037 acres. This means that the expected 191,000 new residents would be accommodated by the expanded UGAs. Development would occur on land currently known to contain prime or good agricultural soils (787 acres) and forest soils (882 acres). The DEIS fails to adequately detail the damage that would be done to the County's prime, or good, agricultural lands by allowing this unnecessary development

Alternative 2 exceeds the land capacity needed to accommodate the housing and job growth projected for the next 20 years.

Alternative 2 would include upzoning to increase residential densities and accommodate

housing at all income levels as well as UGA expansions that would primarily accommodate employment growth with some additional low and medium density residential.

Ridgefield: Under Alternative 2, Ridgefield would add approximately 440 acres for industrial and mixed use purposes. Ridgefield would have to nearly double the capacity to meet their housing allocations target.

Similarly, **La Center:** would have an excess of 178 housing units.

Alternative 3

Under Alternative 3, the urban growth areas would be expanded by about 2,545 acres and additional site specific requests for rezoning would be considered. This means that the expected 191,000 new residents would be accommodated by the expanded UGAs and not within the existing boundaries. As shown by the VBLM, the majority of the future growth can be accommodated without any justification, Alternative 3 allows for excessive expansion that exceeds the land capacity needed to accommodate the housing and job growth projected for the next 20 years beyond that in Alternative 2. **Ridgefield** would have an excess of 6,933 housing units, and **La Center** would have enough capacity under Alternative 3 to meet its housing target, with a projected surplus of more than 500 housing units. In addition, the DEIS fails to adequately address the inevitable increase in noise pollution.

Under Alternative 3, the UGA expansions would convert rural and agricultural areas to residential, mixed use, commercial, and industrial uses. Conversion of prime agricultural land to urban uses under all alternatives except Alternative 1 creates unavoidable impacts. In areas susceptible to landslides, activities such as septic system construction, the watering of lawns, and the redirection of stormwater runoff as a result of development could lead to the saturation of otherwise stable soils and may cause the loss of internal slope stability. The DEIS fails to detail those impacts on the overall ecosystem of the County.

Ridgefield would have an excess of 6,933 housing units.

La Center would have enough capacity under Alternative 3 to meet its housing target, with a projected surplus of more than 500 housing units.

CONCLUSION

We recommend Alternative 1, as it is supported by the data showing that housing needs can be well accommodated within all existing urban growth areas while protecting and enhancing the environment to the benefit of human health and well being into the future. It is the most protective of rural and agricultural lands, yet accommodates new growth. Therefore, any alternative other than Alternative 1 is unnecessary and detrimental to the environment.

Alternative 2 and Alternative 3 would result in an unnecessary net loss of rural lands and agricultural lands of long term commercial significance and the DEIS fails to adequately detail the potential significant adverse environmental impacts that would result from the conversion of those rural and agricultural lands, much less the adverse impacts on the ability of the County to achieve its climate goals as required by the recent amendments to the Growth Management Act.

To be consistent with the Growth Management Act, WAC, and the Clark County Comprehensive Growth Management Plan, conversion of rural and agricultural lands land

under Alternative 2 or 3 would need to be consistent with Clark County Comprehensive Growth Management Plan Policy 3.1.3, which states that "...Rural Area is considered to be permanent and shall not be re-designated to an Urban Growth Area until reviewed pursuant to the Growth Management Act".

In addition, new state requirements to provide for housing at different income levels, will require all jurisdictions to do some upzoning to provide for housing at or below 80% of Area Median Income (AMI).

New growth needs to meet current and future septic, sewer and stormwater criteria.

The relationship of household income to housing prices is the main factor affecting the ability of Clark County's residents to secure adequate housing. Clark County residents who fall below the federal poverty level have a more difficult time securing adequate housing than those with higher incomes. The number of moderately and severely cost-burdened households in Clark County, in combination with high rental rates and increasing home prices, indicates a need for a more affordable and diverse housing stock, particularly for those at the lower ends of the income scale.

The percentage of single-family homes in Clark County has remained fairly consistent since 2010 at approximately two-thirds of housing stock, with over 134,700 units in 2023. Multi-family homes—2 units or greater—made up nearly 23 percent of total housing stock in 2023, with approximately 46,000 units. Developers have focused on single family homes rather than multifamily units. Between 2020 and 2024 the median home price in Clark County went up over 40 percent, from \$403,700 to \$568,600 (WCRER 2025a), outpacing the rise in median income over that same period.

The number of moderately and severely cost-burdened households in Clark County, in combination with high rental rates and increasing home prices, indicates a need for a more affordable and diverse housing stock, particularly for those at the lower ends of the income scale.

Land use patterns, including loss of both rural and resource lands, water degradation due to urban and suburban development and decreased water flow, loss of tree canopy, increase in impervious surfaces also exacerbate the hazards posed by **climate change**, as well as lead to greater emissions of greenhouse gases that contribute to serious climate change events. Low-density and non-contiguous development can result in a greater number of vehicle miles travelled, and result in the removal of trees and vegetation that can help mitigate extreme temperatures.

It should be noted that all alternatives rely on County enforcement. Lack of enforcement of existing County codes has been a continual issue. Code enforcement needs to be expanded and become more efficient.

Economy

**Compiled by Ann Foster, Salmon Creek Farmers Market since 2010,
Second Mile Food Hub, Clark County Food Systems Council**

Tucked away in a small corner of the DEIS (in the sections on Land Use and Shoreline) is the discussion on Economy. It provides a current description of the economy, (ie., jobs) and

the environmental impacts of alternatives 1, 2, and 3. FOCC takes this opportunity to comment on our position that none of this discussion mentions the potential for economic growth in the agricultural sector, especially in light of the recent Clark County Agricultural Lands Study findings, which confidently confirms the fact that Clark County's "asset" is its many acres of prime soils for growing a variety of specialty and profitable crops.

Alternative 1 would preserve the most number of acres available for high-quality farming, given the quality of the soil. If provided support from the county and private sector, agriculture could be the foundation for a successful economic sector that would not only grow food for a growing population amid a changing climate in which imported food becomes less reliable, but would also support a myriad of sub-industries. A vibrant agricultural industry brings business opportunities such as farm equipment repair, cold storage, farm-to-table culinary start-ups, tourism, and engineering and supply chain expertise devoted to transportation and food processing.

We are disappointed that CREDC ignores that agriculture is a powerful economic force. Even the USDA recognizes that agriculture in America brings in over 350 billion to the annual US economy *just* in exports (<https://www.ers.usda.gov/data-products/charts-of-note/chart-detail?chartId=112949>)

Instead CREDC seems to focus on brick and mortar facilities that might house manufacturing, assuming that one viable industry (manufacturing) rather than another viable industry (agriculture) will be the driving force to create a sustainable number of jobs. Its 2024 plan focuses on "critical success factors for continued economic growth in the county, focusing on the region's three-pillar framework to 1) Expand the Existing Base of core industry clusters and start-up ecosystems, 2) Support People through equitable skills and career path development, and 3) Create Place through local strategies and investment in infrastructure and transportation enhancements" (CREDC 2024). We do not see agriculture, or any of its extensions, in this focus.

Clark County's Comp Plan Update Alternative 1, by maintaining existing agricultural land, and designating additional lands as laid out in the Agricultural Resource Lands Study and, in turn, making it available to farmers and food producers, would ensure communities can lead the way in climate change mitigation and resilience, with the implementation of policies such as "encouraging resource-based industries.....which are consistent with rural lands' goals and policies" (Comp Plan Goal: Maintain and enhance opportunities for resource-based industries located on rural lands in Clark County, Policies 9.8).

An existing Goal within the current Comp Plan. 9.2, reads; " Provide commercial and industrial employment opportunities to meet the needs of Clark County citizens." Policy 9.2.1 states "Encourage long-term business investments that generate net fiscal benefits to the region, protect environmental quality and are consistent with the objective of higher wage jobs for Clark County residents"; and 9.2.5 reads "Promote workforce development through collaboration with WSU-Vancouver, Clark College.....to facilitate infrastructure development and other economic development initiatives". Hopefully, with the assistance of an active Agricultural Advisory Commission, partnerships can exist with economic development agencies, such as CREDC and Identity Clark County, to include Agriculture as an economic engine and collaboratively craft programs to incentivize resource-based industries to feed into qualifying farms. Likewise, partnerships with Clark College at Boschma Farms in Ridgefield will build skills and the technological expertise that will help sustain the future of farming in Clark County.

Possible programs that favor the building of agriculture in Clark County are those that put available ag land in the hands of farmers who want and can farm to grow food and meat

processing facilities within the County (currently they are available only in Oregon and Cowlitz County, which is a disadvantage for those raising livestock) and requiring that all warehouses over a certain square-footage must have 10% of its space leased or purchased by a business that serves agricultural businesses (ie., cold storage, dry storage, farm equipment rental and repair, commercial kitchen space, food processing facilities); or the requirement that warehouses, RV parks, storage facilities, manufacturing facilities must devote an acre or two to an incubator farm.

CONCLUSION

We cannot dismiss the importance of farming, growing food, managing livestock, growing hay to feed that livestock, and growing flowers that protect our pollinators. We must have the strength to affirm the current agricultural designations and, now, affirmatively designate that those lands with “prime-quality soil” be Ag Lands such that we as a community can use those lands to our community’s collective benefit. The failure of the DEIS to address these issues makes it flawed.

Friends of Clark County maintains that goals, policies and programs should be implemented that are specifically designed to promote the agricultural economy. This does not mean farm work only, it means a fully functional localized food system. The infrastructure necessary to build and sustain a healthy, thriving ag sector combines a variety of skills and expertise, and, when successful, these jobs can be more sustainable over the years than construction. Just as housing is essential to our economy by providing jobs and building future shelters for our communities, agriculture not only provides an infrastructure filled with small business opportunities, agriculture strengthens our ability to feed our future.

ELEMENT: TRANSPORTATION

Submitted By Jim Byrne, Retired Fish And Wildlife Biologist, Teresa Hardy, Sierra Club

The GMA requires that local comprehensive plans include a transportation element. The GMA further created a formal mechanism for local governments and the state to coordinate transportation planning. The Washington State Growth Management Act (GMA) requires that local land use and transportation systems be balanced and that land use decisions consider transportation needs and impacts. The GMA also requires that local and regional plans be coordinated.

Both Alternative 2 and Alternative 3 would require significant transportation improvements to reduce congestion and achieve a system-wide level-of-service, such as widening the road network, improvements to CTRAN, new bike lands, sidewalks, and construction of new park and ride lots.

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 is needed. Concurrency is required for this to be successful.

Analysis - Key Differences Across Alternatives

Congestion: According to the DEIS, Alternative 3 has the least congestion and vehicle-hours of delay, while Alternative 1 has the highest congestion and delay, but there is NO quantitative data available to support this. No data is provided to show

there would be reduced bridge crossings, either. We know that Alternative 1 can accommodate virtually all of the population allocations for jobs as well.

We do not see data to support the DEIS analysis of Alternative 3. Previous comp plans have focused on increasing sprawling residential development in order to try to keep up some revenue. Broad, and mostly expensive, housing developments should not be a conduit for turning prime farmland and farmlands of statewide significance into housing units.

Previous comp plans have focused on preventing Clark County from becoming a Portland bedroom community. The past two Comprehensive Plan Updates did not attain this goal.

The existing Comp Plan calls for a “higher degree of balance between housing and employment.” Although this may be an existing goal and is strongly supported by FOCC, we are not seeing this in current County practice (e.g. 179th Street).

The model generated by the Regional Transportation Council (RTC) may have a bias for increased transit.

Transit and Active Transportation: The DEIS study proposes that Alternatives 2 and 3 will provide better opportunities for transit and active transportation due to increased density and UGA expansions, but no evidence is provided. Alternative 1 can also provide higher density areas and improved transit, whereas UGA expansion will induce sprawl in many areas.

Under all alternatives, we need to create more Park & Rides for cars in unincorporated Clark County. Currently there are only three, and all are at or near capacity.

Under all alternatives, attention needs to be on the public transit that can adequately supply the needs of the individuals in the more walkable areas and provide adequate transportation.

- Additional safe bike lanes especially north and south. (Current data: only 177 miles of conventional striped bike lanes, and most bike lanes are in Vancouver).
- Sidewalks throughout the County are needed to accommodate pedestrians, wheelchairs, and scooters. (Current data shows 123 total miles of multi-use paths (44 miles paved and 79 miles unpaved)
- 415 miles of shared roadway on moderate and higher traffic streets
- 74 miles of shared roadway on lower traffic streets

All three Alternatives require a major expansion to Transportation goals:

- **Freight Mobility:** All alternatives have similar impacts on freight mobility, with Alternative 3 showing slightly lower vehicle-hours of delay. No significant impact especially in non-peak hours. Only five and 15 hours are saved respectively Alternative 1 (787) Alternative 2 (782) and Alternative 3 (762). Does not support Alternative 2 & 3 as superior to Alternative 1.
- **School Transportation:** Morning peak congestion under all alternatives may impact school bus operations, with Alternative 1 *likely* creating the greatest impact. Likely is not proof. More data is necessary.
- **Rail Transportation.** BNSF has two rail corridors; all Alternatives are

affected the same. Vancouver Junction Railroad (PVJR) is responsible for freight operations. On the line north of Heisson, the Battle Ground, Yacolt, and Chelatchie Prairie Railroad Association (BYCX), a volunteer group, operates a passenger excursion program originating in Yacolt.

Mitigation Measures All can be fulfilled under Alternative 1.

FOCC supports the implementation of transportation improvements identified in the 2024 Regional Transportation Plan (RTP), including roadway upgrades, transit expansions, and active transportation facilities.

- Encourage balanced growth between housing and employment to reduce trip lengths and congestion.
- Develop parallel arterial and collector roadways to reduce demand on state highways.
- Consider alternative mitigation strategies for urban roadways with contextual constraints, such as intersection capacity improvements, transit enhancements, and active transportation infrastructure.
- Improvements to infrastructure must follow concurrency, occurring at the same time, or prior to development. If not, the County has a six year timeframe to complete infrastructure projects.
- Maintain and expand mixed-use zoning in order to make living, working, and shopping a walkable experience.

Additionally, land use patterns and traffic shifts can also exacerbate the issues posed by **climate change**, as well as lead to greater vehicle emissions of greenhouse gases that contribute to hazardous and severe climate change events. Low-density and non-contiguous development can result in a greater number of vehicle miles travelled, and result in the removal of trees and vegetation that can help mitigate extreme temperatures.

CONCLUSION

Taken together, it follows logically that preventing UGA expansion paired with building density, building safe multimodal infrastructure (as required by new climate planning), and providing robust public transit comparable with drive times would reduce traffic congestion and vehicle miles traveled. The DEIS does not provide data to show otherwise. Therefore, FOCC believes that Alternative 1 would still have the least environmental impacts.

Best regards,

Ann Foster, President
Friends of Clark County

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); [Tim Trohimovich](#)
Cc: [Brooke Frickleton](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: FW: Comments on Draft EIS for the Comp Plan Update
Date: Monday, December 1, 2025 8:08:46 AM
Attachments: [Outlook-0pdxctxd](#)
[Outlook-cjeidzu.png](#)
[2024-11-25 FW Comments on EIS for Comp Plan Update Clark Cnty.pdf](#)
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Good day, Tim,

Thank you for submitting Futurewise'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
Program Assistant
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From: Tim Trohimovich <Tim@futurewise.org>
Sent: Wednesday, November 26, 2025 5:29 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Brooke Frickleton <brooke@futurewise.org>
Subject: Comments on Draft EIS for the Comp Plan Update

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Dear Staff and Consulting Team:

Enclosed please find Futurewise's comments on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025). Thank you for considering our comments.

If you need anything else, please let me know.

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



Futurewise

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November 26, 2025

Community Planning
Clark County
Comp Plan Comments
P.O. Box 9810
Vancouver Washington 98666

Dear Staff and Consulting Team:

Subject: Comments on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025)

Sent via email: comp.plan@clark.wa.gov

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025) (DEIS). Futurewise agrees with the County's decision to prepare an environmental impact statement (EIS). The comprehensive plan and the development it will authorize is likely to have a significant probable adverse impact on the environment. We appreciate that Clark County is preparing an EIS to address these impacts. We also appreciate the helpful information included in the DEIS.

In addressing the adequacy of a nonproject EIS, the Court of Appeals wrote that:

In Leschi v. Highway Comm'n, 84 Wn.2d 271, 525 P.2d 774 (1974), a majority of the Supreme Court held that the adequacy question is one of law, subject to *de novo* review by the courts. The test to be applied is "whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data." *Leschi v. Highway Comm'n*, *supra* at 286, 525 P.2d at 785.¹

WAC 197-11-440(6)(a) requires that for the elements of the environment significantly affected by the proposed action, "the EIS shall describe the existing

¹ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts.” WAC 197-11-442 (1) provides that the lead agency shall have more flexibility in preparing EISs on nonproject proposals. WAC 197-11-442(2) also provides that for nonproject EISs

[t]he lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC 197-11-060(3)). Alternatives including the proposed action should be analyzed at a roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative).

As is documented below, the DEIS fails to comply with these requirements for several elements of the environment.

Comments on the Alternatives

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.

Futurewise reiterates its comments from its June 5, 2024, letter on the scope of the EIS that the EIS needs to include one alternative should accommodate the selected population and employment projections within the existing urban growth areas (UGA) and not convert natural resource lands to other uses. None of the three alternatives meet this recommendation. The Washington State Supreme Court has written that:

The State Environmental Policy Act of 1971 (SEPA) directs that “alternatives to the proposed action” be included in an EIS. RCW 43.21C.030(c)(iii). Under the Washington Administrative Code, consideration by the County Council of reasonable alternatives is mandatory. WAC 197-11-440(5)(b). SEPA rules define “reasonable alternatives” as less environmentally costly action that “could

feasibly attain or approximate a proposal's objectives." WAC 197-11-786.²

The Determination of Significance and Request for Comments on Scope of Environmental Impact Statement identifies its objectives as the alternative's "ability to accomplish the objectives of GMA and the objectives of the Comprehensive Plan and County-wide Planning Policies."³ This alternative will feasibly attain or approximate the proposal's objectives of complying with the Growth Management Act (GMA), the comprehensive plan objectives, and the county-wide planning policies at lower environmental costs. This is explained in more detail in Futurewise June 5, 2024, letter on the scope of the EIS.

None of the alternatives in the DEIS achieves the objectives from the scoping notice with less environmental impact than this alternative. Therefore Alternatives 2 and 3 should not have been included in the DEIS. The failure to include an alternative that accommodates the selected population and employment projections within existing urban growth areas (UGAs) means the EIS is inadequate.

Comments on the Affected Environment, Significant Impacts, and Mitigation Measures

Comments on 3.3.1 Description of the Affected Environment, A. Air Quality and B. Climate. Please see pp. 49 through 55.

SEPA EISs are required to analyze greenhouse gas pollution.⁴ In addition, RCW 36.70A.070(9)(d)(i)(A) provides:

(d)(i) The greenhouse gas emissions reduction subelement of the comprehensive plan, and its related development regulations, must identify the actions the jurisdiction will take during the planning

² *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 183, 979 P.2d 374, 385 (1999), as amended on denial of reconsideration (Sept. 22, 1999).

³ State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Clark County Comprehensive Plan Update 2025-2045 p. 3 of 4 (May 15, 2024).

⁴ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology*, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.

cycle consistent with the guidelines published by the department pursuant to RCW 70A.45.120 that will:

(A) Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state[.]

While we appreciate that the DEIS identified current greenhouse gas emissions, we recommend that the EIS also analyze the impacts of the alternatives to ensure they comply with RCW 36.70A.070(9)(d)(i)(A)'s require for an overall reduction in greenhouse gas emissions.

Comments on Table 4. Summary of Potential Environmental Impacts p. 8 and 3.4.2 Significant Environmental Impacts A. Surface Water on pp. 60 – 61.

All of Washington's water is already allocated to a water user. According to Ria Berns, who manages the Washington State Department of Ecology's Water Resources Program, "[e]ven when there is enough snowpack and enough water flowing through Washington's rivers and streams, it's all spoken for"⁵ The State of Washington Department of Ecology writes that for the Cowlitz, Lewis, and Salmon-Washougal watersheds:

Increasing demands for water over time, from ongoing population growth, agriculture, and other consumptive uses as well as associated land use practices, have resulted in lower streamflows and declining groundwater levels in some areas. These decreases have impacted important resources for fisheries and general stream health.⁶

⁵ Conrad Swanson, *Trump keeps talking about taking PNW water – is that possible?* The Seattle Times (Updated Feb. 23, 2025 at 7:00 am) last accessed on May 12, 2025, at: <https://www.seattletimes.com/seattle-news/climate-lab/trump-keeps-talking-about-taking-pnw-water-is-that-possible/> and at the link on the last page of this letter with the filename: "Trump keeps talking about taking PNW water is that possible.pdf."

⁶ State of Washington Department of Ecology, Water Resources Program, *WRIA 26 Cowlitz Watershed Water Availability* p. 3 (Publication 20-11-026 Oct. 2023) last accessed on Nov. 26, 2025, at: <https://ecology.wa.gov/water-shorelines/water-supply/water-availability/in-your-watershed> and enclosed at the link on the last page of this letter with the filename: "2011026.pdf;" State of Washington Department of Ecology, Water Resources Program, *WRIA 27 Lewis Watershed Water Availability* p. 3 (Publication 20-11-027 Sept. 2023) last accessed on Nov. 26, 2025, at: <https://ecology.wa.gov/water-shorelines/water-supply/water-availability/in-your-watershed> and enclosed at the link on the last page of this letter with the filename: "2011027.pdf;" State of Washington Department of Ecology, Water Resources Program, *WRIA 28 Salmon-Washougal*

The DEIS does not address the lack of water availability in the County's basins. The DEIS does not address the adverse environmental impacts of water withdrawals Ecology has already found in the county's watersheds. The EIS also does not address the impact of permit-exempt wells on surface or ground either despite Alternative 2's planned rural population increase of 1,037 and Alternative 3's planned rural population increase of 2,545.⁷ Futurewise's June 5, 2024, letter on the scope of the EIS wrote that rural development adversely impacts water resources and the availability of irrigation and stock water in Clark County.⁸ Surface and ground water are elements of the environment.⁹ The impacts of addition urban and rural water withdrawals for new development on surface and ground water must be analyzed in the EIS. The impacts of transfers of agricultural water rights for development must also be analyzed.

The existing water limitations will be aggravated by increasing droughts. 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 temperature and precipitation averages. According to the Washington State Department of Ecology, Washington has experienced unusually

Watershed Water Availability p. 3 (Publication 20-11-028 Sept. 2023) last accessed on Nov. 26, 2025, at: <https://ecology.wa.gov/water-shorelines/water-supply/water-availability/in-your-watershed> and enclosed at the link on the last page of this letter with the filename: "2011028.pdf."

⁷ Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt p. 4 (October 1, 2025).

⁸ State of Washington Department of Ecology, Water Resources Program, *WRIA 26 Cowlitz Watershed Water Availability* p. 3 (Publication 20-11-026 Oct. 2023); State of Washington Department of Ecology, Water Resources Program, *WRIA 27 Lewis Watershed Water Availability* p. 3 (Publication 20-11-027 Sept. 2023);" State of Washington Department of Ecology, Water Resources Program, *WRIA 28 Salmon-Washougal Watershed Water Availability* p. 3 (Publication 20-11-028 Sept. 2023).

⁹ WAC 197-11-444(1)(c)(i), (ii), (iv), (v).

dry periods almost every year since 2000 (Washington Department of Ecology, 2007).¹⁰

Further, RCW 36.70A.070(9)(e)(i) requires that “[s]pecific goals, policies, and programs of the [comprehensive plan] resiliency subelement must include, but are not limited to, those designed to: ... (C) Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.” Consistent with this requirement, when analyzing water resources, the EIS must adequately analyze future droughts and propose mitigation measures for droughts.

Comments on 3.8.2.2 Impact of Alternative 2 C. Resource Lands on p. 131.

The DEIS claims that “[t]he transfer of land represents approximately 1 percent of the existing agricultural lands, and as such does not represent a substantial loss of resource lands.” The DEIS does not cite to any evidence or include any analysis supporting this conclusion. Further, just examining the percentage loss is the wrong standard for analyzing the loss of agricultural lands.

The Court of Appeals concluded that

[t]he principal GMA goal served by designating and conserving [agricultural resource lands] ARL is that of RCW 36.70A.020(8): to “[m]aintain and enhance natural resource-based industries, including productive ... agricultural ... industries.” This and related provisions evidence “a legislative mandate for the conservation of agricultural land.” *King County*, 142 Wn.2d at 562, 14 P.3d 133. The purpose of ARL designation is further focused by WAC 365-190-050(5), which states that in the application of ARL designation criteria, “the process should result in designating an amount of [ARL] sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term.”¹¹

¹⁰ 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 Nov. 26, 2025, at: <https://clark.wa.gov/communications/clark-regional-natural-hazard-mitigation-plan> and enclosed at the link on the last page of this letter with the filename: “CRNHMP Vol 1 2023_202304041255191062.pdf.”

¹¹ *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 831–32, 365 P.3d 207, 221 (2015).

The EIS needs to analyze whether, after the dedesignations proposed in Alternative 2, there is enough designated agricultural lands of long-term commercial significance “sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities” as WAC 365-190-050(5) requires. This analysis needs to take into account that between 2017 and 2022, Clark County lost 34,699 acres of land in farms, a 38.24 percent decrease.¹²

Also, as our letter on the scope of the EIS documented, in 2023, the State Department of Commerce updated WAC 365-190-050(3)(c)(i) to provide that one of the factors to determine if an area has long-term commercial significance for agricultural lands is “[t]he classification of prime and unique farmland soils, and farmlands of statewide importance, as mapped by the Natural Resources Conservation Service[.]” Previously WAC 365-190-050(3)(c)(i) did not include farmlands of statewide importance. The EIS must also identify the adverse impacts of rural development and urban growth area expansions, if any, on prime farmland soils, unique farmland soils, and farmlands of statewide importance.

Comments on 3.8.2.3 Impact of Alternative 3 C. Resource Lands on p. 138.

The DEIS claims that the “transfer of land represents approximately 5 percent of the existing agricultural lands, and as such does not represent a substantial loss of resource lands.” The DEIS does not cite to any evidence or include any analysis supporting this conclusion. Further, just examining the percentage loss is the wrong standard for analyzing the loss of agricultural lands.

The Court of Appeals concluded that

[t]he principal GMA goal served by designating and conserving [agricultural resource lands] ARL is that of RCW 36.70A.020(8): to “[m]aintain and enhance natural resource-based industries, including productive ... agricultural ... industries.” This and related provisions evidence “a legislative mandate for the conservation of agricultural

¹² United States Department of Agriculture, National Agricultural Statistics Service, 2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-17-A-47 Chapter 2. County Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017 pp. 283 -- 288 (April 2019) last accessed on March 26, 2025 at: https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_2_County_Level/Washington/ and enclosed at the link on the last page of this letter with the filename: “st53_2_008_008.pdf.”

land.” *King County*, 142 Wn.2d at 562, 14 P.3d 133. The purpose of ARL designation is further focused by WAC 365-190-050(5), which states that in the application of ARL designation criteria, “the process should result in designating an amount of [ARL] sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term.”¹³

The EIS needs to analyze whether, after the dedesignations proposed in Alternative 3, there is enough designated agricultural lands of long-term commercial significance “sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities” as WAC 365-190-050(5) requires. This analysis needs to take into account that between 2017 and 2022, Clark County lost 34,699 acres of land in farms, a 38.24 percent decrease.¹⁴

Comments on 3.8.3 Avoidance and Mitigation Measures C. Resource Lands on pp. 140 – 41.

DEIS on page 141 claims that: “While not prohibited, it is a goal of the GMA to prevent the unnecessary conversion of agricultural land to urban uses.” This sentence misstates the law. As the Washington State Supreme Court has held: “Once agricultural lands had been designated, the Act also required counties and cities to adopt development regulations to assure the conservation of the designated lands RCW 36.70A.060(1). The County was required *to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.*¹⁵ The lands the DEIS is analyzing are designated agricultural lands of long-term commercial significance. RCW 36.70A.060(1) is a requirement, not a goal. As long as they maintain that designation Clark County is required “*to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural*

¹³ *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 831–32, 365 P.3d 207, 221 (2015).

¹⁴ United States Department of Agriculture, National Agricultural Statistics Service, 2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-17-A-47 Chapter 2. County Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017 pp. 283 -- 288 (April 2019).

¹⁵ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

*products.*¹⁶ The EIS needs to correct this error of law and redo the analysis taking the correct legal standards into account.

As the above quote indicates, counties and cities cannot “choose to avoid converting agriculture lands to a non-resource, urban designation ...” as the DEIS implies on page 141. Avoiding converting agricultural lands of long-term commercial significance is a requirement of state law.¹⁷ Again, the analysis must be redone to comply with state law. An EIS that misstates state law is inadequate. As the Washington State Supreme Court has held: “The test to be applied is “whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data.” *Leschi v. Highway Comm'n, supra* at 286, 525 P.2d at 785.”¹⁸ The supportive opinion must be correct.

Comments on 3.9.2 Significant Environmental Impacts, A. Travel Demand Forecasting pp. 150 – 51.

Studies show that increases in density reduce per capita vehicle miles traveled.¹⁹ This effect tends to be more pronounced in higher density areas with lower density areas experiencing less reduction in per capita vehicle miles traveled although density still reduces per capita vehicle miles traveled.²⁰ Dispersed employment also tends to increase per capita vehicle miles traveled and increasing employment density in smaller, lower density communities can increase per capita vehicle miles travel.²¹

¹⁶ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

¹⁷ *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000).

¹⁸ *Ullock v. City of Bremerton*, 17 Wn. App. 573, 580, 565 P.2d 1179, 1184 (1977).

¹⁹ Lei Zhang, Jinhyun Hong, Arefeh Nasri, Qing Shen, *How built environment affects travel behavior: A comparative analysis of the connections between land use and vehicle miles traveled in US cities* 5 *The Journal of Transport and Land Use* 40, pp. 45 – 47 (2012) last accessed on Nov. 26, 2025, at: <https://www.jtlu.org/index.php/jtlu/article/view/266> and at the link on the last page of this letter with the filename: “john_barneson,+Journal+manager,+Article4.pdf.” The *Journal of Transport and Land Use* is peer-reviewed. *Journal of Transport and Land Use* Submissions webpage last accessed on Nov. 26, 2025, at: <https://jtlu.org/index.php/jtlu/about/submissions> and at the link on the last page of the letter with the filename: “Submissions _ Journal of Transport and Land Use.pdf.”

²⁰ *Id.* p. 47.

²¹ *Id.* pp. 74 – 48.



Given these findings, it was surprising to see that Alternatives 2 and 3 have lower vehicle miles traveled and lower vehicle-hours traveled than Alternative 1.²² If we understand the DEIS correctly, all three alternatives have the same population and employment targets.²³ Alternatives 2 and 3 apparently do have density increases to accommodate housing affordable to households earning 80 percent or less of the county median income which would tend to decrease per capita vehicle miles traveled.²⁴ But Alternatives 2 and 3 include urban growth area expansions, dedesignations of agricultural lands, and for Alternative 3 rural upzones.²⁵ These changes will tend to spread the same population and employment over a larger area and increase per capita vehicle miles traveled. These changes seem inconsistent with the modeling and should be explained.

RCW 36.70A.070(9)(d)(i)(B) provides:

(d)(i) The greenhouse gas emissions reduction subelement of the comprehensive plan, and its related development regulations, must identify the actions the jurisdiction will take during the planning cycle consistent with the guidelines published by the department pursuant to RCW 70A.45.120 that will:

....

(B) Result in reductions in per capita vehicle miles traveled within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state[.]

However, the DEIS does not compare the per capita vehicle miles traveled for the alternatives and against the current per capita vehicle miles traveled. Since the comprehensive plan needs to reduce per capita vehicle miles traveled, it is necessary to document if that can be achieved by any alternative.

Comments on 3.10.2 Significant Environmental Impacts D. Water Supply and Sewer Services pp. 192 –95.

²² Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt p. 151 (October 1, 2025).

²³ *Id.* p. 1, pp. 16 – 17.

²⁴ *Id.*

²⁵ *Id.*



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November 26, 2025

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All of Washington's water is already allocated to a water user. According to Ria Berns, who manages the Washington State Department of Ecology's Water Resources Program, "[e]ven when there is enough snowpack and enough water flowing through Washington's rivers and streams, it's all spoken for"²⁶ While the DEIS estimated public water demand by alternative, it does not address whether these water systems have sufficient water rights to meet the demand. This is an important issue given the lack of available water in the State and also Clark County.²⁷

Futurewise also supports the comments on the EIS by the Friends of Clark County.

Thank you for considering our comments. If you require additional information, please contact me at email: tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

Enclosures at this link:

https://futurewiseorg.sharepoint.com/:f:/g/Ejq90Y4Toe9Ase5mwxoJlOYBDu_z8qLl2hfw97vIQ1mh5A?e=3brYRI

²⁶ Conrad Swanson, *Trump keeps talking about taking PNW water – is that possible?* The Seattle Times (Updated Feb. 23, 2025 at 7:00 am) last accessed on Nov. 26, 2025, at: <https://www.seattletimes.com/seattle-news/climate-lab/trump-keeps-talking-about-taking-pnw-water-is-that-possible/> and at the link on the last page of this letter with the filename: "Trump keeps talking about taking PNW water is that possible.pdf."

²⁷ State of Washington Department of Ecology, Water Resources Program, *WRIA 26 Cowlitz Watershed Water Availability* p. 3 (Publication 20-11-026 Oct. 2023); State of Washington Department of Ecology, Water Resources Program, *WRIA 27 Lewis Watershed Water Availability* p. 3 (Publication 20-11-027 Sept. 2023); State of Washington Department of Ecology, Water Resources Program, *WRIA 28 Salmon-Washougal Watershed Water Availability* p. 3 (Publication 20-11-028 Sept. 2023).

Rebecca Messinger

From: Tim Trohimovich <Tim@futurewise.org>
Sent: Monday, January 27, 2025 6:21 PM
To: Cnty 2025 Comp Plan; Rebecca Messinger; Glen Yung; Michelle Belkot; Wil Fuentes; Matt Little; Sue Marshall
Cc: Brooke Frickeleton
Subject: Futurewise comments on the alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS) on the comp plan
Attachments: 2025-01-28 FW Comments on EIS Alts Comp Plan Update Clark Cnty Council.pdf

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.

Dear Council Chair Marshall and Councilors Yung, Belkot, Fuentes, and Little and Staff:

Enclosed please find Futurewise's comments on the land use alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS) for the Clark County Comprehensive Plan Update 2025-2045. Thank you for considering our comments.

If you need anything else, please contact me.

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



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January 28, 2025

The Honorable Sue Marshall, Council Chair
Clark County Council
PO Box 5000
Vancouver, Washington 98666-5000

Dear Council Chair Marshall and Councilors Yung, Belkot, Fuentes, and Little:

Subject: Comments on the land use alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS) for the Clark County Comprehensive Plan Update 2025-2045

Sent via email: comp.plan@clark.wa.gov; rebecca.messinger@clark.wa.gov;
glen.yung@clark.wa.gov; michelle.belkot@clark.wa.gov;
wil.fuentes@clark.wa.gov; matt.little@clark.wa.gov; sue.marshall@clark.wa.gov;

Thank you for the opportunity to comment on the land use alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS). Futurewise has the following recommendations:

- First, some have argued that Clark County must consider all of the site-specific comprehensive plan and zoning amendments because the County is not doing an annual update this year. But Clark County Code (CCC) 40.560.030 provides that requests for map or text amendments do not need to be processed unless the County Council decides to include the map or text amendment in the work program for the following year or a future work program.¹ The County is not required to process those requests as comprehensive plan and development regulation amendments.²
- Second, Futurewise recommends that 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).
- Third, the site-specific comprehensive plan and zoning amendments outside the urban growth areas cannot be included in the EIS because they are not a reasonable alternative. That is because the site-specific comprehensive plan

¹ CCC 40.560.030C.6., D.

² CCC 40.560.030C.6., D.

and zoning amendments cannot feasibly attain or approximate the proposal's objectives at a lower cost to the environment as WAC 197-11-440(5)(b) requires. So Alternative 3 should be dropped from the EIS. Analyzing Alternative 3 will also require lots of time and money, so the agricultural and forest dedesignations will require extensive study. The urban growth area expansions, the agricultural and forest dedesignations, and the rural upzones will also need to be modeled for their greenhouse gas emissions. These changes tend to increase greenhouse gas pollution and will make complying with Growth Management Act requirement to reduce greenhouse gas pollution and per capita vehicle miles traveled very difficult risking appeals of the EIS and the comprehensive plan.³

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.

Neither the Clark County Code nor the Growth Management Act require the County to process the site-specific comprehensive plan and zoning amendment requests.

The 2025 update site-specific requests were not formal applications where the applicants' fill out application materials and pay the application fee for comprehensive plan and zoning amendments. Instead, the County allowed applicants to request the site-specific changes without formal applications and without paying the required application fees.⁴ As such they fall under the docketing procedures of Clark County Code (CCC) 40.560.030. CCC 40.560.030 provides that requests for map or text amendments do not need to be processed unless the County Council decides to include the map or text amendment in the work program for the following year or a future work program.⁵ The County is not required to process those requests as comprehensive plan and development regulation amendments.⁶

³ RCW 36.70A.070(9)(d)(i)(A) - (B).

⁴ Clark County, Washington Community Planning 2025 Update Site-Specific Requests webpage last accessed on Jan. 27, 2025, at: <https://clark.wa.gov/community-planning/2025-update-site-specific-requests>.

⁵ CCC 40.560.030C.6., D.

⁶ CCC 40.560.030C.6., D.

The Growth Management Act also does not require the County to process these applications as part of the 2025 periodic update. Instead, RCW 36.70A.130(1)(a) provides that Clark County “shall take legislative action to review and, if needed, revise its comprehensive land use plan and development regulations to ensure the plan and regulations comply with the requirements of this chapter [the Growth Management Act] according to the deadlines in subsections (4) and (5) of this section.” We urge the County Council to focus on the actions needed to bring the County comprehensive plan and development regulations into compliance with the Growth Management Act, not to be side tracked by individual requests many of which violate the Growth Management Act.

Arguments that Clark County must consider all of the site-specific comprehensive plan and zoning amendments because the County is not doing an annual update ignore CCC 40.560.030 and RCW 36.70A.130(1)(a). Instead, we urge the County to do the important work of providing for affordable housing, reducing greenhouse pollution, and adapting to the changes occurring because of climate change as the Growth Management Act requires.⁷

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.

The Washington State Supreme Court has written that:

The State Environmental Policy Act of 1971 (SEPA) directs that “alternatives to the proposed action” be included in an EIS. RCW 43.21C.030(c)(iii). Under the Washington Administrative Code, consideration by the County Council of reasonable alternatives is mandatory. WAC 197-11-440(5)(b). SEPA rules define “reasonable alternatives” as less environmentally costly action that “could feasibly attain or approximate a proposal’s objectives.” WAC 197-11-786.⁸

Futurewise recommends including least one alternative that accommodates the selected population and employment projections within existing urban growth

⁷ RCW 36.70A.130(1)(a).

⁸ *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 183, 979 P.2d 374, 385 (1999), as amended on denial of reconsideration (Sept. 22, 1999).

Re: Comments on the land use alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS) for the Clark County Comprehensive Plan Update 2025-2045

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areas (UGAs). The Determination of Significance and Request for Comments on Scope of Environmental Impact Statement identifies its objectives as the alternative's "ability to accomplish the objectives of GMA and the objectives of the Comprehensive Plan and County-wide Planning Policies."⁹ This alternative will feasibly attain or approximate the proposal's objectives of complying with the Growth Management Act (GMA), the comprehensive plan objectives, and the county-wide planning policies at lower environmental costs.

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."¹⁰ A 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.¹¹

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."¹² 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

⁹ State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Clark County Comprehensive Plan Update 2025-2045 p. 3 of 4 (May 15, 2024).

¹⁰ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 - 52, 190 P.3d 38, 48 - 49 (2008).

¹¹ 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 Dec. 4, 2024, 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 Dec. 4, 2024, 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."

¹² 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.

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available in moderate cost communities.¹³ 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.¹⁴ 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.¹⁵ 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 apparent need and no apparent legal authority to expand the county's urban growth areas.¹⁶

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 throughout the United States including Clark County.¹⁷ They found that the per capita costs of most public services declined with density and increased where urban areas were large.¹⁸ 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.¹⁹

¹³ 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 231031.pdf."

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 - 52, 190 P.3d 38, 48 - 49 (2008).

¹⁷ 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 Dec. 4, 2024, at: https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit/20/23J1/20-0/20Futurewise_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."

¹⁸ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003).

¹⁹ RCW 36.70A.020(3), (12); RCW 36.70A.060(2); RCW 36.70A.070(3), (6).

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.²⁰ So accommodating the same population and jobs in the existing UGA can reduce future water demands and costs.²¹ 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.²² 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 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).²³

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

²⁰ 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 Dec. 4, 2024, 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.”

²¹ *Id.* at p. 8.

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

²³ 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 Dec. 4, 2024, at: <https://clark.wa.gov/communications/clark-regional-natural-hazard-mitigation-plan> and enclosed at the link on the last page of this letter with the filename: “CRNHMP Vol 1 2023_202304041255191062.pdf.”

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 2001.²⁴ 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.”²⁵ 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.²⁶ 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 metropolitan housing market increased after adoption of the GMA.²⁷ 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.²⁸ 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.²⁹

²⁴ 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.”

²⁵ *Id.* at 356.

²⁶ *Id.* at 356 – 57.

²⁷ 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.”

²⁸ *Id.* at 392 – 93.

²⁹ RCW 36.70A.020(1), (8), (10), (12); RCW 36.70A.060(1); RCW 36.70A.070(2), (3), (5); RCW 36.70A.110.

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 2002.³⁰ 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.³¹ 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.³²

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.³³ The Washington Climate Advisory Team (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.³⁴ A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.³⁵ Nationally,

³⁰ 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 Dec. 4, 2024, 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."

³¹ *Id.* at 330.

³² RCW 36.70A.070(1), (6).

³³ State of Washington Department of Ecology, Washington's *greenhouse gas inventory* webpage last accessed on Dec. 4, 2024, at: <https://ecology.wa.gov/Air-Climate/Climate-change/Greenhouse-gases/2017-greenhouse-gas-data>; *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) last accessed on Dec. 4, 2024, at: <https://fortress.wa.gov/ecy/publications/SummaryPages/o8o1oo8b.html> and enclosed at the link on the last page of this letter with the filename: "o8o1oo8b.pdf."

³⁴ *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).

³⁵ 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 Dec. 4, 2024, 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,

densities must increase on average by 19 percent.³⁶ The paper concluded this can be achieved by a “mix of small apartment buildings and modest single-family homes”³⁷ This will also help achieve the GMA requirements to protect the environment, reduce per capita vehicle miles traveled, and reduce greenhouse gas pollution.³⁸

Not converting natural resource lands to other uses complies with the GMA’s legislative mandate for the conservation of natural resource lands. 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 the conservation of agricultural land.”³⁹ 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.⁴⁰

As we have seen, this alternative can achieve the proposal’s objectives at lower environmental costs. This alternative must be analyzed in the Draft and Final Environmental Impact Statements (EISs).⁴¹

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.”

³⁶ 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).

³⁷ *Id.*

³⁸ RCW 36.70A.020(10), (14); RCW 36.70A.070(1), (5), (9).

³⁹ *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 142 Wn.2d 543, 562, 14 P.3d 133, 143 (2000).

⁴⁰ *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.

⁴¹ *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 183, 979 P.2d 374, 385 (1999).

The site-specific comprehensive plan and zoning amendment requests cannot legally be included in the EIS because they cannot feasibly attain or approximate the proposal's objectives at a lower cost to the environment as WAC 197-11-440(5)(b) requires.

To be included in an EIS, an alternative must “be reasonable.”⁴² As the Washington State Supreme Court has concluded “a reasonable alternative is one that could feasibly attain or approximate a proposal’s objectives at a lower cost to the environment.”⁴³ The Determination of Significance and Request for Comments on Scope of Environmental Impact Statement identifies its objectives as the alternative’s “ability to accomplish the objectives of GMA and the objectives of the Comprehensive Plan and County-wide Planning Policies.”⁴⁴ The site-specific comprehensive plan and zoning amendment requests may only be included in the EIS if they will have “a lower cost to the environment” than the proposal.⁴⁵ Site-specific comprehensive plan and zoning amendment requests are not needed to accommodate the population projection.⁴⁶

They will not provide affordable housing. “[O]ver 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.”⁴⁷ Clark County is a higher housing cost community.⁴⁸ So these

⁴² *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 184, 979 P.2d 374, 385 (1999).

⁴³ *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 184-85, 979 P.2d 374, 385 (1999).

⁴⁴ State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Clark County Comprehensive Plan Update 2025-2045 p. 3 of 4 (May 15, 2024).

⁴⁵ WAC 197-11-440(5)(b).

⁴⁶ 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.

⁴⁷ 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.

⁴⁸ Washington Center for Real Estate Research Runstad Department of Real Estate College of Built Environments, *Washington State Housing Market Report 3rd Quarter 2024* p. 12 last accessed on Dec. 4, 2024, at: <https://wcrer.be.uw.edu/housing-market-data-toolkit/housing-market-reports/> and at the link on the last page of this letter with the filename: “Washington-Housing-Market-Report-3rd-Quarter-2024.pdf;” Washington Center for Real Estate Research Runstad Department of Real Estate College of Built Environments, *Washington State Apartment Market Report 3rd Quarter 2024* p. 5 last accessed on Dec. 4, 2024, at: <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2024/11/Washington-Apartment-Market-Report-Q3-2024.pdf> ;and at the

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affordable housing units will need to be constructed as low-rise multifamily and mid-rise multifamily dwellings to be affordable even with subsidies.⁴⁹ These housing types are also in demand for market rate housing. So, an even higher percentage of the housing to be constructed over the next 20 years will need to be these housing types to make progress on affordable housing. These housing types only make sense in existing urban growth areas where the needed public facilities and services can be provided.

Converting agricultural or forest lands to urban or rural development will have greater environmental impacts than the proposal. Similarly, converting rural lands to higher density rural or urban development will also have greater impacts than the proposal. Consequently, the site-specific comprehensive plan and zoning amendment requests cannot legally be included in the EIS.

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, WSBA No. 22367
Director of Planning & Law

Enclosures at this link:

https://futurewiseorg.sharepoint.com/:f:/g/Ejq9oY4Toe9Ase5mwxOJlOYBDu_z8qLl2hfw97vIQ1mh5A?e=kiIkZP

link on the last page of this report with the filename: "Washington-Apartment-Market-Report-Q3-2024.pdf."

⁴⁹ 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).

Summary of Other Comp Plan Findings to Protect Agricultural Capacity in Clark County

- Population growth, employment projections, and housing needs can all be accommodated within the current urban growth areas.
 - See Futurewise Jan 28, 2025¹ Comments on land use alternatives, presenting evidence for the benefits and feasibility of compact urban growth density, water conservation imperatives, reduced transportation impacts, and minimizing adverse environmental impacts.
 - And “...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.”²
 - See Planning Commission worksession on the Agricultural Land Study where job and housing projections are dissected, indicating existing urban areas suffice for the planning horizon
 - Population-job projections are of questionable meaning in actual reality
 - Housing needs are attainable within the Cities’ current UGA
- Agriculture land protection is a mandate rather than an alternative.
 - See also Futurewise comments on the DEIS Alternatives³ defending Alternative 1 (no urban expansion) due to several key issues, including
 - Lack of adequate Water availability
 - “the percentage loss [of resource lands] is the wrong standard for analyzing the loss of agricultural lands”
 - The GMA requires that “there is enough designated agricultural lands of long-term commercial significance ‘sufficient to maintain and enhance the economic viability of the agricultural industry in the county over the long term; and to retain supporting agricultural businesses, such as processors, farm suppliers, and equipment maintenance and repair facilities’ as WAC 365-190-050(5) requires.”
 - “Clark County is required ‘to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.’” and “Avoiding converting agricultural lands of long-term commercial significance is a requirement of state law ⁴
 - See also FOCC comments on the DEIS in defense of Alternative 1, the need to elevate and support farm economics; no need for expanded urban development.⁵

¹ Futurewise Jan 28, 2025 “Comments on land use alternatives to be studied as part of the Draft Environmental Impact Statement (DEIS) for the Clark County Comprehensive Plan Update 2025-2045”

² Futurewise 1-2025 page 6 footnote: RCW 36.70A.020(8), (10) , (12); RCW 36.70A.060(1); RCW 36.70A.070(3).

³ Futurewise November 26, 2025. Comments on the Draft Environmental Impact Statement for the Updated Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt (October 1, 2025)

⁴ IN Futurewise 11/2025:16 King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields), 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.

⁵ Friends of Clark County DEIS Comments 11-26-2025 re Water, Housing, Economy, and Transportation