

**From:** [Jeffrey Delapena](#)  
**To:** [Tim Trohimovich](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Rebecca Messinger](#); [Oliver Orjiako](#); [Jose Alvarez](#)  
**Subject:** RE: Comments on the preferred alternative for the FEIS for the Clark County Comprehensive Plan Update  
**Date:** Tuesday, January 6, 2026 8:26:00 AM  
**Attachments:** [Outlook-imfwbyac](#)  
[Outlook-y32tyclo.png](#)  
[2026-01-06 FW Comments on Preferred Alt Comp Plan Update EIS Clark Cnty Council and PC.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

Good day, Tim,

Thank you for providing Futurewise's feedback ahead of the Joint Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Planning Commission and Council ahead of the Hearing. This will also be added to the Index of Record.

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

---

**From:** Tim Trohimovich <Tim@futurewise.org>  
**Sent:** Monday, January 5, 2026 7:21 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Sue Marshall

<Sue.Marshall@clark.wa.gov>

**Cc:** Brooke Frickleton <brooke@futurewise.org>

**Subject:** Comments on the preferred alternative for the FEIS for the Clark County Comprehensive Plan Update

**EXTERNAL:** This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear County Councilors, Planning Commissioners, and staff:

Enclosed please find Futurewise's comments on the preferred alternative for the Final Environmental Impact Statement (FEIS) for the Clark County Comprehensive Plan Update 2025-2045. Thank you for considering our comments.

If you require anything else, please let me know.

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



Futurewise  
1201 3rd Ave #2200, Seattle, WA 98101  
(206) 343-0681  
[tim@futurewise.org](mailto:tim@futurewise.org)  
[futurewise.org](http://futurewise.org)  
connect:  



1201 3rd Ave Suite 2200, Seattle, Washington 98101  
p. (206) 343-0681  
futurewise.org

January 6, 2026

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 and the Planning Commissioners:

**Subject: Comments on the preferred alternative for the Final Environmental Impact Statement (FEIS) for the Clark County Comprehensive Plan Update 2025-2045**

Sent via email: [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov); [jeffrey.delapena@clark.wa.gov](mailto:jeffrey.delapena@clark.wa.gov); [rebecca.messinger@clark.wa.gov](mailto:rebecca.messinger@clark.wa.gov); [glen.yung@clark.wa.gov](mailto:glen.yung@clark.wa.gov); [michelle.belkot@clark.wa.gov](mailto:michelle.belkot@clark.wa.gov); [wil.fuentes@clark.wa.gov](mailto:wil.fuentes@clark.wa.gov); [matt.little@clark.wa.gov](mailto:matt.little@clark.wa.gov); [sue.marshall@clark.wa.gov](mailto:sue.marshall@clark.wa.gov);

Thank you for the opportunity to comment on the preferred alternative land use alternative to be studied as part of the Final Environmental Impact Statement (FEIS) for the work session and public hearing. Futurewise has the following recommendations:

- Futurewise recommends that the preferred 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). This alternative should also accommodate the required affordable housing targets within the existing urban growth areas.
- 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.<sup>1</sup> And the cities and unincorporated urban growth areas will likely need to increase their

---

<sup>1</sup> 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 last accessed on Jan. 5, 2026, at: [https://clark.wa.gov/sites/default/files/media/document/2024-02/Allocation%20Housing\\_Method%20A.pdf](https://clark.wa.gov/sites/default/files/media/document/2024-02/Allocation%20Housing_Method%20A.pdf) and at link on the last page of this letter with the filename: “Allocation Housing\_Method A.pdf.”

capacity for low-rise multifamily and mid-rise multifamily dwellings to meet the affordable housing requirements which will increase the housing capacity in the cities and unincorporated urban growth areas. So, there is no need and no legal authority to expand the county's urban growth areas.<sup>2</sup>

- The Clark County Agricultural Lands Study documents “that 98 the existing percent of the 101,844-acre Agricultural Land Base (99,900 acres) is classified as having Prime or Statewide Importance soils. A nearly identical share, 96 percent (31,400 acres), is found within the existing 32,589-acre Agricultural Designations. This near-universal prevalence indicates that from a soil-capability perspective, the vast majority of lands identified in the study area are physically well-suited for agricultural production.”<sup>3</sup> The other factors also show that these lands qualify as agricultural lands of long-term commercial significance.<sup>4</sup> The preferred alternative should retain the existing agricultural lands of long-term commercial significance designation and add the Agricultural Land Base that meet the criteria agricultural lands of long-term commercial significance.
- The 519 acres that Ridgefield and La Center are requesting to pave over forever are prime agricultural lands and farmlands of statewide importance and meet the other criteria for agricultural lands of long-term commercial significance.<sup>5</sup> Consequently, these lands cannot be legally dedesignated under WAC 365-190-040(10)(c).
- In the past Clark County was able to dedesignate agricultural lands of long-term commercial significance that continued to meet the criteria and have them annexed before the Growth Management Hearings Board and the courts found that these dedesignations violated the Growth Management Act. That is no longer possible because dedesignations and urban growth area expansions do not take effect until after the Growth Management Hearings Board appeals are resolved.<sup>6</sup> So, dedesignations that violate state law are now a waste of time and money as they will be appealed and overturned and cannot be annexed during the appeal period.<sup>7</sup>

---

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

<sup>3</sup> EConorthwest, *Clark County Agricultural Lands Study* pp. 62 – 63 (Clark County Planning & Development Department: Nov. 2025) last accessed on Jan. 5, 2025, at: <https://clark.wa.gov/sites/default/files/media/document/2025-11/final-agricultural-lands-study-technical-report-2025.11.04-1.pdf> and at the link on the last page of this letter with the filename: “final-agricultural-lands-study-technical-report-2025.11.04-1.pdf.”

<sup>4</sup> *Id.* pp. 66 – 73.

<sup>5</sup> *Id.* pp. 62 – 73.

<sup>6</sup> RCW 36.70A.067.

<sup>7</sup> RCW 36.70A.067.

- The preferred alternative must comply with the requirements to reduce per capita vehicle miles traveled in RCW 36.70A.070(1) and RCW 36.70A.070(9)(c) and (d)(i)(B). The most effective way to reduce per capita vehicle miles traveled is to focus growth into existing cities and towns because they allow shorter automobile trips and encourage walking, bicycling, and transit use, reduce per capita vehicle miles traveled (VMT).<sup>8</sup>
- The preferred alternative must comply with RCW 36.70A.070(9)(c) and (d)(i)(A) which require the Clark County Comprehensive Plan to include a greenhouse gas emissions reduction subelement that will “[r]esult in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction ....” Like per capita vehicle miles traveled, the most effective way to reduce overall greenhouse gas emissions generated by transportation and land use is to focus growth into existing cities and towns. A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.<sup>9</sup> Nationally, densities must increase on average by 19 percent.<sup>10</sup> The paper concluded this can be achieved by a “mix of small apartment buildings and modest single-family homes ....”<sup>11</sup> This will also help achieve the GMA requirements to protect the environment, reduce per capita vehicle miles traveled, and reduce greenhouse gas pollution.<sup>12</sup> They will also increase housing capacity and housing affordability.

---

<sup>8</sup> Arthur C. Nelson, *Compact Development Reduces VMT: Evidence and Application for Planners—Comment on “Does Compact Development Make People Drive Less?”*, 83 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 36 pp. 36 – 38 (2017), DOI: 10.1080/01944363.2016.1246378 enclosed at the link on the last page of this letter with the filename: “Compact Development Reduces VMT Evidence and Application for Planners Comment on Does Compact Development Make People Drive Less.pdf.” The Journal of the American Planning Association is peer-reviewed. Journal of the American Planning Association Instructions for authors webpage enclosed at the link on the last page of this letter with the filename: “JAPA Instructions for Authors June 2017.pdf.”

<sup>9</sup> 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 Jan. 5, 2026, 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 Jan. 5, 2025, 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.”

<sup>10</sup> 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).

<sup>11</sup> *Id.*

<sup>12</sup> RCW 36.70A.020(10), (14); RCW 36.70A.070(1), (5), (9).

Re: Comments on the preferred alternative for the Final Environmental Impact Statement (FEIS) for the Clark County Comprehensive Plan Update 2025-2045  
January 6, 2026  
Page 4

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email: [tim@futurewise.org](mailto: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/IgA6vaGOE9HvQLHuZsMdCZTmAQ7v8\\_Ki5doX8Pe7yENZoeQ?e=QOqer4](https://futurewiseorg.sharepoint.com/:f:/g/IgA6vaGOE9HvQLHuZsMdCZTmAQ7v8_Ki5doX8Pe7yENZoeQ?e=QOqer4)