

From: [Jeffrey Delapena](#)
To: [Bryan Snodgrass-Vancouver](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: City of Vancouver comment letter for 1/8 County hearing on Preferred Alternative
Date: Thursday, January 8, 2026 10:43:00 AM
Attachments: [26 01 08 COV Ltr on County PA - Signed.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Bryan,

Thank you for providing comments on behalf of the City of Vancouver ahead of tonight's Joint Hearing to select the Preferred Land Use Alternative.

I am forwarding to Rebecca Messinger from the Council's Office. 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

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From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Thursday, January 8, 2026 10:39 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: City of Vancouver comment letter for 1/8 County hearing on Preferred Alternative

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Thank you



January 8, 2025

RE: City of Vancouver recommendation in support of DEIS Alternative 2 with minor adjustments for the Preferred Alternative in the countywide Comprehensive Plan update

Honorable Chairs Marshall and Johnson, and Clark County Councilors and Planning Commissioners:

Thank you very much for the opportunity to comment as this lengthy Comprehensive Plan update process enters its final year. Since 2023 the County Council has made several foundational decisions to reach this point, and the Cities have engaged in their own lengthy local community and stakeholder outreach efforts to develop their proposals before you today. We believe Alternative 2 with minor adjustments is the most realistic way to build on the process to date rather than blow it up, and to head towards adopting successful long term plans for our communities:

1. **Alternative 2, with minor adjustments, is the vision and choice of the communities ultimately responsible for managing and servicing long term urban growth in Clark County.** It reflects the visions and goals of local communities brought forward through their elected and appointed bodies, and was chosen after lengthy input from property owners and stakeholders. It reflects practical and local consideration and analysis of housing, economic, service provision and other implications in Clark County's urban areas.

For the Vancouver UGA, the following minor adjustments to Alternative 2 are recommended to bring it closer into compliance with the Growth Management Act, and existing County policies:

- a. As recommended in the County staff report, remove proposed VUGA employment expansions east of WSU and north of 199th Street. These sites were added relatively late in the process by the County only to make the math balance and did not emerge from community visioning. Both sites contain extensive parcelization and critical lands, and both have limited local property owner support for employment development and in some cases widespread local opposition. We support the County staff recommendation to now remove the sites because of existing employment land capacity in the City of Vancouver.
 - b. Add some employment land zoning at one or more previously identified sites in the existing VUGA located miles from the shopping or employment opportunities, or zoning that would support it. Failure to provide or allow remotely close commercial or employment in wide swaths of the existing VUGA forces local residents into long drives to reach these services, further clogging existing arterial roadways. This also appears to violate HB 1181 GMA climate mandates to lower per capita Vehicle Miles Travelled (VMT), and longstanding Countywide Planning Policy 1.4.1 which calls for locating frequently used commercial activities near residential areas. The City of Vancouver identified 17 potential VUGA sites in 2024 correspondence, and in 2025 follow up suggested working with three large site specific residential upzone requests (Ginn/Glenwood, Ginn/Weber, Pacific Lifestyle Homes/Weisner, and Ginn/Wells) submitted to the County to include small commercial components. None of these sites were included in DEIS Alternative 2.
2. **The County's data shows that Alternative 2 provides more than enough land to fully meet future housing and jobs needs countywide.** Three years ago the County Council adopted a long term countywide population forecast that was higher than recommended by the Cities and higher than predicted as most likely by OFM, along with a countywide jobs forecast to match the population. The County staff report for this hearing confirms that Alternative 2 has land capacity for 38,000 more housing units and 3,300 more jobs than are needed to accommodate the aggressive adopted countywide forecasts. These findings of excess capacity are from the County's own VBLM model, which at least on the residential side has been extensively reviewed. We also appreciate additional efforts to further examine the residential model countywide by the recently submitted BIA/Johnson Economics study, but

unfortunately the unsigned study appears based on a small and highly skewed sample, and contains reporting errors that prevent drawing any meaningful conclusions in our view.¹

- 3. The County's data also shows that Alternative 2 provides for balanced growth with ample ownership opportunities that will likely develop during the planning period.** Two thirds of existing housing units countywide are single family homes according to the County DEIS, and most of these aren't going away. The DEIS also indicates that Alternative 2 has zoning for more than three times as much land countywide for low density residential development than it does for high density residential and mixed use combined. Even in the City of Vancouver, half of existing homes are single family, and more than twice as much land under Alternative 2 is zoned for low density residential development than for high density and mixed use combined. See [DEIS](#) pages 111 and 127.

New state laws allowing unit subdivisions and lot splitting will expand opportunities to create more new single family housing. To facilitate development of these land inventories during the planning period, the Cities as well as Clark County are also taking a flexible regulatory approach overall, with new minimum density requirements that are achievable.

- 4. Selecting Alternative 3 or anything close would likely require redoing much of this entire Comprehensive Plan update process.** Alternative 3 as mapped can't be legally adopted as it includes many disjointed UGA expansion proposals not connected to any existing or proposed UGA boundary. Even a scaled down version of Alternative 3 limited to contiguous UGA expansion requests would still require re-adopting the original countywide population forecast at a much higher level, probably higher than the range allowed by OFM. Even if the increased countywide population forecast could be kept within the allowed range, much of the DEIS would probably need to be reworked and republished. Alternative 3 is not a

¹ The [12/8/25 Johson study](#) asserts that that the VBLM overestimates residential capacity countywide, but based only a small sample of land division plats in high density zones only, in the City of Vancouver and VUGA only. Most importantly, in sampling those high density zones it excluded apartment and multi-family site plans, which are more common and typically denser than land division plats. The samples of plats also contained reporting errors. The study cites the Fircrest Short Plat in Vancouver as producing only 9, when County GIS reports their actual yields to date are [28](#) units, three times as much. We understand this and other reporting errors are being corrected, but not the fundamental distortion created by evaluating high density zone development activity without considering apartments and other site plans.

Unlike the residential modeling, the VBLM employment assumptions were not reviewed at length by the original Buildable Lands Project Advisory Committee (BLPAC) and contain many outdated assumptions. The most prominent of these include assuming home based work will only account for 4% of future countywide jobs when the County DEIS reports the most recently actual countywide number is 18.7%, and effectively assuming there will be no vertical mixed use buildings in the Mixed Use zone in the Vancouver UGA. If the County chooses to update the VBLM or the jobs forecast, these shortcomings should be corrected.

realistic or legally defensible option, and in fact most of the site-specific requests it contains were known by the Cities when they developed their proposed growth scenarios.

5. **A cautious and measured approach to new growth and UGA expansion should be taken in light of inescapable future realities.** The GMA requires new 20-year plans be reviewed extensively after 5 years, and requires that they be completely redone with new long term growth forecasts every 10 years. Decisions made now can be adjusted in the coming years, but mostly just in one direction - it is far easier to add new land at these near term future intervals than to remove or downzone land added now.

Looking beyond the next 20 years, Clark County has a finite amount of total land that can be urbanized around the VUGA or elsewhere, and limits are being reached. Aggressively using this land now will mean having to more dramatically slow growth in future updates.

Thank you again for the opportunity to comment. We look forward to working with Clark County and local cities to bring this Comprehensive Plan update process to a successful and defensible conclusion in the coming months that meets the needs of our communities.

Sincerely,



City of Vancouver Mayor Anne McEnerny-Ogle