

From: [Jeffrey Delapena](#)
To: "Acosta, Maricsa"; [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: Joint Cities Letter - Countywide Comprehensive Plan Preferred Alternative
Date: Thursday, January 8, 2026 11:11:00 AM
Attachments: [25 01 07 Joint City ltr on Preferred Alternative signed.pdf](#)
[image002.png](#)
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[image006.png](#)

Good day, Maricsa,

Thank you for providing the joint cities letter ahead of tonight's Joint Hearing to select the Preferred Land Use Alternative.

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

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Acosta, Maricsa <Maricsa.Acosta@cityofvancouver.us>
Sent: Thursday, January 8, 2026 11:07 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Joint Cities Letter - Countywide Comprehensive Plan Preferred Alternative

Some people who received this message don't often get email from maricsa.acosta@cityofvancouver.us. [Learn why this is important](#)

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Hello,

Attached is the joint cities letter regarding the Countywide Comprehensive Plan update. I am submitting this on behalf of the participating cities for your reference.

Feel free to reach out if you have any questions.

Thanks,
~Maricsa

Maricsa Acosta | Senior Support Specialist
CITY OF VANCOUVER, WASHINGTON
Community Development Department
Office: (360) 487-7813
www.cityofvancouver.us





January 7, 2026

Chair Marshall and Clark County Councilors Yung, Belkot, Fuentes, and Little

Chair Johnson and County Planning Commissioners Harroun, Baker, Fadness, Bergthold, Wogen, and Halbert

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

On behalf of the undersigned Cities and Towns in Clark County we respectfully urge you to select Draft EIS Alternative 2 with minor adjustments noted in our individual testimony as the Preferred Alternative for the Final EIS of the Countywide Comprehensive Plan update. Thank you very much for this opportunity to provide our joint recommendation now, and throughout this lengthy process. Successful completion of this update in the spring of 2026 will in our view require building on past decisions, with some adjustments as needed, rather than completely revamping the foundational choices that have already been made. Our recommendation is based on the following:

- 1. DEIS Alternative 2, with minor adjustments, is the formal vision and choice of the communities ultimately responsible for managing and servicing all long term urban growth in Clark County.** It reflects the future visions and goals of local communities expressed through their elected and appointed bodies, and was chosen after numerous local public hearings and forums in the individual communities impacted, with input from property owners and other parties and groups. It reflects practical and local consideration of housing, economic, service provision and other implications in Clark County's urban areas.

2. **Alternative 2 provides for extensive and balanced growth to meet future housing and jobs needs countywide.** Alternative 2 provides more than enough land to meet the aggressive countywide population and jobs targets already chosen by the County Council, according to the DEIS and the County staff report for this hearing. *Despite the need for some upzoning to meet new GMA housing requirements, the clear majority of new land zoned for housing under Alternative 2 is for low density residential – three times as much countywide land than zoned for high density residential and mixed use combined according to the [DEIS](#).* This, and the fact that most existing housing units countywide are single family homes, and the fact that new state laws allowing unit subdivisions and lot splitting expand opportunities to create more new detached housing, all ensure that Alternative 2 with adjustments will provide ample ownership as well as rental opportunities for our communities. The Cities as well as Clark County are also taking a flexible regulatory approach overall, with achievable minimum densities to ensure land can and likely will fully develop during the planning period.
3. **The recently released Agricultural Lands Study should not be used as a basis to exclude from the Preferred Alternative limited expansions proposed by the undersigned small cities to meet their visions.** We appreciate the completion of the study and acknowledge its overall support for the continued viability of agriculture as a countywide industry and land use, but believe further discussion is needed, particularly on the key question of properties immediately adjacent to existing urban areas. Urban adjacency is a designation criteria under GMA which along with others appears to have been given little weight in the study. The County also has made no formal or even informal determination about the overall study itself. Until this can occur, the limited expansions into agriculturally zoned lands proposed by the undersigned cities under Alternative 2 to meet community visions and in some cases state housing requirements should not be excluded from the Preferred Alternative.
4. **Going forward, the Cities will continue to work with County staff to bring the numbers and mapping of Alternative 2 closer to balancing.** The County DEIS and staff report for this hearing confirms that Alternative 2 has a large surplus of excess land needed to meet the Council’s adopted countywide population forecast, and a small surplus of excess employment land. This

reflects the realities of the new proposed upzones in Alternative 2 needed to meet GMA housing requirements, as well as recent market trends towards higher average densities and more efficient use of land than in the past.

Cities are nonetheless working with the County to review zoning density assumptions to make sure they remain accurate, and to potentially adjust growth allocation targets between the jurisdictions. Some further limited map refinement may need to be done in existing areas as well.

- 5. Selecting Alternative 3 or anything close to it would require redoing much of the entire Comprehensive Plan update process.** Alternative 3 as mapped could not be legally adopted as it includes many disjointed UGA expansion proposals not physically connected to any existing or proposed UGA boundary. Even a scaled down version of Alternative 3 limited to those site specific requests that are contiguous would likely require adopting a much higher countywide population forecast, potentially higher than allowed by OFM. Most of the site-specific requests in Alternative 3 were known and considered by the Cities when they developed their proposed growth scenarios. Based on these local considerations, some of the site-specific requests were included in Alternative 2 and others were not. There is no policy reason for Alternative 3, since Alternative 2 is shown by the County DEIS to have more than enough room to accommodate the County's aggressive long term growth targets in a balanced and achievable manner, with ownership as well as rental opportunities.

Thank you again for the opportunity to comment. It is our hope that the extensive process to date can be respected and built upon, with adjustments as needed, but not completely redone. This is particularly the case for the lengthy local public and stakeholder processes and analyses that the individual Cities all completed in their areas to arrive at their proposed growth scenarios, which are now contained in Alternative 2, with adjustments. We come together now as the undersigned Cities of Clark County to urge adoption of Alternative 2 as the Preferred Alternative, with adjustments noted in testimony submitted by the individual Cities.

Please don't hesitate to contact our staff or ourselves with any questions. We look forward to working together to successfully adopt all our new Comprehensive Plans in this update cycle and lay a sound foundation for future updates to come.

Sincerely,



City of Battle Ground



City of La Center



City of Vancouver



City of Ridgefield



City of Washougal