

From: [Jeffrey Delapena](#)
To: [Mitch Kneipp](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: Washougal Comment for CC & PC DEIS Hearing
Date: Thursday, January 8, 2026 3:07:00 PM
Attachments: [image001.png](#)
[City of Washougal DEIS Hearing Comment \(01-08-2026\).pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good day, Mitch,

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

I am forwarding to additional 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



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From: Mitch Kneipp <Mitch.Kneipp@cityofwashougal.us>
Sent: Thursday, January 8, 2026 3:04 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: RE: Washougal Comment for CC & PC DEIS Hearing

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You don't often get email from mitch.kneipp@cityofwashougal.us. [Learn why this is important](#)

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.

Good afternoon,

Please substitute the attached corrected letter for the letter sent previously. It was corrected to remove a reference to the Town of Yacolt.

Thank you!

Mitch



MITCH KNEIPP (he/him/his)

Community Development Director

360.835.8501 ext. 604 | cityofwashougal.us

Permit Center | 211 39th Street | Washougal, WA 98671

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From: Mitch Kneipp

Sent: Thursday, January 8, 2026 2:54 PM

To: Comp.plan@clark.wa.gov

Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <jose.alvarez@clark.wa.gov>

Subject: Washougal Comment for CC & PC DEIS Hearing

Good afternoon,

Please find a comment letter from the City of Washougal for tonight's Joint County Council & Planning Commission Hearing. If you would please be so kind to add this to the record.

I will joining the hearing remotely this evening to present Washougal's desire for Alternative 2. If possible, during my testimony, could you have the Alternative 2 map of Washougal displayed? I would greatly appreciate it.

Please let me know should you need anything else.

Thanks,
Mitch



MITCH KNEIPP (he/him/his)

Community Development Director

360.835.8501 ext. 604 | cityofwashougal.us

Permit Center | 211 39th Street | Washougal, WA 98671

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January 8, 2026

Clark County Council
Clark County Planning Commission
Comp.plan@clark.wa.gov
Delivered via email

RE: City of Washougal's DEIS Preferred Alternative Selection Comments

CITY HALL
1701 C Street
Washougal, WA
98671
(360) 835-8501
Fax (360) 835-8808

Thank you for the opportunity to comment on the selection of a countywide preferred land use alternative as part of the periodic update to the Clark County Comprehensive Growth Management Plan. The City of Washougal (City), in partnership with the cities of Battle Ground, La Center, Ridgefield, and Vancouver, submitted a joint letter dated January 8, 2026, expressing collective support for the Draft Environmental Impact Statement (DEIS) Alternative 2 with adjustments, and providing other comments related to the Agricultural Land Study and periodic update process. The City agrees with the positions expressed in that letter and this letter is intended to augment the joint letter with information and interests specific to Washougal. Thus, comments relayed in the joint letter will not be repeated below.

POLICE DEPARTMENT
1320 A Street
Washougal, WA
98671
(360) 835-8701
Fax (360) 835-7559

Washougal Preferred Land Use Alternative

DEIS Alternative 2 incorporates the City's locally preferred land use alternative which was unanimously approved by the Washougal City Council on April 14, 2025, following an extremely robust public engagement process and with a unanimous recommendation from the Washougal Planning Commission (April 8, 2025).

Washougal's locally preferred alternative embodied in DEIS Alternative 2 provides land capacity in the city to accommodate:

- 2,125 new jobs (including 503 jobs which do not require employment land)
- 5,998 new housing units

FIRE & RESCUE
1400 A Street
Washougal, WA
98671
(360) 835-8701
Fax (360) 699-4859

The City's preferred alternative results in a surplus in land capacity to meet Washougal's housing allocation but does not provide sufficient land to meet the job allocation. To aid in your deliberation process, we want to provide further context regarding the housing and job capacity of Washougal's preferred alternative.

Employment Capacity

A discrepancy in the baseline assumptions in the Vacant Buildable Lands Model (VBLM) resulted in overestimating the employment capacity in Washougal and its UGA, which led to the County allocating a larger number of jobs to Washougal than its land capacity can accommodate. The City and County determined after discussion in multiple meetings during the summer and fall of 2024 that the zoning adopted under the City's NE and NW UGA Subarea Plans (completed in 2016) was not accurately incorporated into the County VBLM before it was used to generate and establish existing land capacity. The City considered different ways to address this error as part of the local land use alternatives selection but could not accommodate all jobs assigned without rezoning more land for employment, which runs contrary to the 2016 subarea plans and the City's current comprehensive plan. Washougal approached the City of Vancouver to see if they were willing to accept our jobs surplus, which they were. This is noted in your hearing materials, as the County staff recommendation is that the surplus of jobs allocated to Washougal can be absorbed by Vancouver.

Housing Capacity

Washougal's preferred land use alternative accommodates the County-assigned housing allocation with sufficient opportunities across all income categories by implementing mandated state legislation (middle housing and accessory dwelling units), combined with capacity in its existing mixed-use zones including the Town Center (TC-Core, TC- East Village, TC- West Village) and Commercial districts (Community Commercial, Highway Commercial and Convenience Commercial).

Because of the state's middle housing legislation, the City has excess capacity to accommodate housing. State law (RCW 36.70A.110[2]), requires only that there be a minimum of 20 years of land supply within UGAs, but does not mandate that excess capacity be eliminated. In fact, having greater capacity promotes more housing supply and affordability consistent with the intent of the State's middle housing and ADU legislation. It is our understanding that County staff would like to reduce surplus housing capacity in the Countywide Preferred Alternative, which would require Washougal to revisit density assumptions that the City vetted through significant local public participation. The City cannot reduce its housing capacity without downzoning some areas to lower densities, something that would run counter to the intent of state legislation.

State law requires that Washougal allow two (2) middle housing units on any lot zoned for residential use and allow two (2) ADUs on all residential lots that allow single-family homes. To evaluate the implications of both middle housing and ADU regulations on land and housing capacity, the City established a rate of development for both vacant and developed lots within the City. The City did not assume that middle housing and ADU development would occur on every vacant and developed lot. Rather, the City assumed a very conservative rate ranging from 2 to 10 lots for every 100 lots in residential zones. Even with these modest rates of middle housing and ADU development, the City's housing capacity exceeds the number of units the County allocated to Washougal.

Middle housing units and ADUs can be built regardless of the rate established in our capacity analysis. Reducing the rate of middle housing and ADUs assumed in our analysis would affect our ability to meet housing at different affordability levels. It is unclear what other mechanism the City could employ to reduce housing capacity, aside from downzoning residential land, which is counterproductive.

Agricultural Land Study

The joint letter from the cities and Town of Yacolt points out that the Agricultural Lands Study should have considered criteria other than soil quality, such as adjacency to urban areas. Without consideration of these other factors, the Agricultural Lands Study paints a skewed picture of the agricultural land base and should not be used as the sole basis to validate agricultural lands designations or to recommend against UGA expansions. Further discussion and action is needed by the County Council to address the designation criteria that were excluded from consideration in the Agricultural Land Study before using it as the basis of decision making.

County Staff Recommendation

It appears that County staff are recommending DEIS Alternative 2 in the Preferred Alternative Selection Table without UGA expansions for La Center, Ridgefield and Yacolt. If UGA expansions are not included with DEIS Alternative 2, it is not clear whether there would be sufficient capacity within remaining UGAs to meet the 20-year growth targets at the varying affordability levels.

If the County Council agrees with County staff that UGA expansion should not occur, it is unclear which of the alternatives from the County's EIS could be selected since Alternative 1 (No Action) does not contain enough housing and employment capacity and Alternatives 2 and 3 both include UGA expansions. The County may have to develop another alternative that does not include expansion, but includes enough housing and employment capacity, undoing two years of work by the cities, and potentially requiring that the EIS be supplemented with additional analysis and leading to further delays.

In the City's view Alternative 2 is the only GMA compliant alternative. Therefore, the City requests that the County Planning Commission recommend DEIS Alternative 2 to the County Council for adoption as it is the only alternative that has sufficient capacity to accommodate growth, reflects the publicly vetted preferred growth alternatives for each community, and contains only contiguous UGA expansions.

The City of Washougal appreciates the efforts of the staff, Planning Commission, and County Council throughout this project. We are grateful for the opportunity to continue to work together for the betterment of our entire community.

Sincerely,



Mitch Kneipp
City of Washougal
Community Development Director

CC. Oliver Orijako, Director, Department of Community Planning
Jose Alvarez, Program Manager