

From: [Rebecca Messinger](#)
To: [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: FW: City of Vancouver comment letter for April 27 and 28 County Council hearing on Preferred Alternative
Date: Friday, April 24, 2026 12:19:47 PM
Attachments: [26 04 24 COV ltr to County Council on PA.docx](#)
[image001.png](#)

Jeff,

Please see the attached comments from Bryan Snodgrass.

Thank you,
Rebecca



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305

Email: Rebecca.Messinger@clark.wa.gov



From: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Sent: Friday, April 24, 2026 12:01 PM
To: Snodgrass, Bryan <bryan.snodgrass@cityofvancouver.us>; Sue Marshall <Sue.Marshall@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>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Cc: Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; Paulsen, Erik <E.Paulsen@cityofvancouver.us>
Subject: FW: City of Vancouver comment letter for April 27 and 28 County Council hearing on Preferred Alternative

Bryan,

Your comments have been received and will be added to the record.

Thank you,



Rebecca Messinger

Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305

Email: Rebecca.Messinger@clark.wa.gov



From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>

Sent: Friday, April 24, 2026 11:18 AM

To: Sue Marshall <Sue.Marshall@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>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>

Cc: Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; Paulsen, Erik <E.Paulsen@cityofvancouver.us>

Subject: City of Vancouver comment letter for April 27 and 28 County Council hearing on Preferred Alternative

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.

Councilors

Attached please find correspondence from the City of Vancouver for the April 27 and 28 hearings on the countywide Preferred Alternative. Thank you.



April 22, 2026

RE: City of Vancouver recommendation for the Countywide Preferred Alternative, In support of the County Planning Commission recommendation, with adjustment

Honorable Chair Marshall and Councilors Yung, Belkot, Fuentes, and Little

Thank you very much for the opportunity to comment, and for the important work the County Council, Planning Commission and staff has completed over the course of this long update process. Our recommendations for the Countywide Preferred Alternative are the following:

- 1. Build on past foundational decisions in this update, don't reverse them.** Over the past three years the County has selected aggressive long term countywide growth forecasts and allocations, and adopted a Vacant and Buildable Lands Model. Last year the County published a Draft Environmental Impact Statement concluding that there is a significant countywide surplus of land in existing urban areas to meet the growth targets, including the number of new housing units needed. Minor adjustments to these choices may be needed to successfully finish this update, such as tweaks to the growth allocations between individual jurisdictions, but major changes at this stage will only further delay the process.

- 2. Adopt the Preferred Alternative recommended by the County Planning Commission with some exceptions noted herein. The recommended Preferred Alternative has more than enough land for growth, at achievable densities, with ample opportunities for home ownership as well as renting.**
 - The recommended Preferred Alternative adds further land to DEIS Alternative 2, which the DEIS reports has capacity for 38,000 more housing units and 3,000 more jobs than needed to meet the adopted countywide growth targets.
 - Vancouver, Clark County and the small cities are planning for achievable densities for the 20 year planning period. In its two most prominent residential districts, Low Scale Neighborhood and Medium Scale Neighborhood, the City of Vancouver is requiring a

minimum of 8 and 16 units per acre, densities that are being achieved today. ¹ Local jurisdictions are taking steps to allow more affordable housing, but are not requiring it to be built.

- Two-thirds of existing countywide housing units are single family homes, most of which will still be here 20 years from now. Thousands of these are typically available for sale every year. To further ensure new ownership opportunities, DEIS Alternative 2 zones more than three times as much land for low density residential than it does for higher density residential and mixed use combined. (See County DEIS pages 111 and 127). The recommended Preferred Alternative has more single family zoned land than Alternative 2. Whatever the supply, new state laws allowing for unit lot subdivisions and lot splitting options will further facilitate ownership opportunities, along with existing options like cottage clusters.

- 3. Affirm in particular the County Planning Commission and staff recommendation to remove north and northeast VUGA expansions for employment.** Both sites were not added until relatively late in the Comprehensive Plan update process, and then only because of changes in the math that created a temporary VUGA jobs deficit that has since been addressed. They were not added because of conditions on the ground, as both sites including the northern one are heavily parcelized with extensive critical lands, and limited support for employment development by property owners within the sites. If brought in now they would both likely yield limited employment development and revenue, and might be subsequently converted to residential zoning.
- 4. Add new employment opportunities at one or more identified sites within the existing VUGA that have no shopping or employment opportunities nearby, or nearby zoning that allows these amenities.** Failure to provide or allow remotely close commercial or employment options 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 inconsistent with [HB 1181](#) GMA climate mandates to lower per capita Vehicle Miles Travelled (VMT), and longstanding [County Comprehensive Plan 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](#) narrowed this to three large site specific residential upzone requests made to the County by property owners, where potentially commercial components could be added with the proposed housing.

¹ A 12/8/25 Johnson/BIA study asserted that Vancouver multi-family density assumptions were not being achieved by recent development, but the study only examined platted land divisions, not apartments and other site plans which are the much more common and denser type of development occurring in multi-family zones.

Despite this history the issue was not voted on or discussed by the Planning Commission at the January 29 hearing, or listed in the staff report's table of VUGA items for them to consider. We urge the Council to consider and discuss the issue at the upcoming hearing. Recognizing this is challenging given the many other Preferred Alternative issues to review, we suggest two alternatives:

- a) Adopt Urban Holding overlay designations on the identified sites or a subset of them, accompanied by Comprehensive Plan language indicating that the designations are intended to remain in place until opportunities to facilitate employment or shopping opportunities on all or part of the properties are fully explored in coordination with the City of Vancouver; or
- b) Adopt policy direction to ensure the issue is fully explored in the near future, we suggest amending existing County Comprehensive Plan policy 1.4.1 to read:

1.4.1 Interrelated uses should generally be encouraged to locate in close proximity of each other:

- *Frequently used commercial activities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- *Schools or other frequently used public facilities and the residential areas they serve should be allowed and encouraged to locate near to one another.*
- *Commercial, industrial or other employers and the residential areas they serve should be allowed and encouraged to locate near to one another, as long as negative impacts from non-residential uses on the residential areas are mitigated.*
- *Clark County in coordination with interested cities shall fully and timely explore opportunities in their UGAs to facilitate employment and shopping opportunities in residential areas which lack such opportunities in reasonably close proximity.*

5. Pursue options for small City growth with consideration of countywide implications.

- The City of Vancouver supports the small Cities in their growth planning. However, if the Council does interpret the agricultural de-designation criteria to allow the City-proposed UGA expansions to proceed, it should consider and discuss what the implications are for other site specific UGA expansion requests requiring de-designation. There should also be discussion about need and what happens if de-designation expansions are approved locally but then reversed by the Hearings Board as they have been several times in the past. We would ask the Council to affirm that any follow up expansions would not then be made to the already oversized VUGA if needed to compensate for expansions denied by the courts elsewhere.
- Similarly, Vancouver, like some other local Cities, has reviewed its assumed future densities by zone and shared updated information with County staff that could modestly

reduce the countywide residential land surplus found by the VBLM. However, the adjustments we have identified are justified by improved accuracy. We would oppose any VBLM changes made simply to lower the totals. Under GMA land capacity analyses are supposed to objective calculations, while forecasts and allocations are supposed to where growth policy is considered.

If the Council does revisit VBLM residential assumptions, we suggest it also examine the VBLM employment model which has received much less time and attention during this update, and as a result has outdated assumptions which likely underestimate actual capacity. See recent [testimony](#) for ways to address this.

- The City of Vancouver also supports continued exploration of a Transfer of Development Rights (TDR) program, but not to committing to one through a written Countywide Planning Policy or other means, until the goals and likely feasibility of a program have been further developed. We appreciate the work and information brought forward in the recent workshops, but at this stage the type, location and extent of resource lands to be protected have not been discussed. There has not been an assessment of whether the development market for TDRs that would need to be created would be economically feasible, or of the administrative costs involved. There has been little discussion of how a TDR program requiring some sites to effectively purchase added density with HB 1220 requirements currently facing all jurisdictions to facilitate generally higher densities would work. As acknowledged by workshop presenters and recent [written citizen testimony](#), many existing Washington TDR programs are dormant and have not resulted in activity.

Vancouver is not one of the Cities currently pursuing TDR, but if a local program was established it would create significant expectations on the part of resource land property owners that they receive compensation, and significant pressures on a future County Council to expand a program countywide or take other measures to spur activity. We recognize the potential of TDR but suggest we know more about specific program goals and feasibility before we commit, as there is time to get this right. If participation of the City-requested UGA expansion properties is critical to this, those lands could be given an Urban Holding overlay designation, and/or the expansions delayed until the groundwork needed to launch a successful and sustainable program is completed.

6. Consider this update as part of the longer continuum of past and future updates that have occurred and will occur in the finite land space of Clark County.

- One local lesson from the past is the largest countywide UGA expansions in state history, which occurred here in 2007 and which we are still catching up with. Despite these additions, in the years leading up to the next countywide UGA expansions in 2016, Clark County housing prices rose twice as fast as those statewide, according to Washington Center for Real Estate Research data. ² This does not suggest that land and UGA expansions are not needed for housing over time, but does suggest that the relationship between UGA sizing and housing affordability is considerably more nuanced than usually discussed, and that increasing raw land supply on its own is not a solution to housing affordability challenges.
- A consideration going forward is that the GMA allows and requires frequent updates. Twenty-year forecasts and land supplies must be revisited every 10 years, well before supplies run out. A major Comprehensive Plan review is required every five years. If needed Counties are allowed to update forecasts and UGAs even more frequently than this. These requirements and allowances helpfully provide for adjustments and course corrections. However, as a practical matter most UGA expansions are difficult or impossible to reverse once adopted, and there is a finite amount of land countywide to urbanize now or in the future, and limits are being reached. Efforts to continue the past rate of growth, or type of growth, into the future will force more pronounced slowing and changes in the in the future.

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 legally defensible conclusion in the coming months in a way that meets the needs of our communities.

Sincerely,

A handwritten signature in dark ink, appearing to read "Erik W. Paulsen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Erik Paulsen, Vancouver City Councilmember

² Housing prices increased 16% in Clark County vs 8% statewide from 2008 Q1 to 2016 Q2 per Washington Center for Real Estate Research Housing Market Reports [Reports and Resources](#) | (uw.edu). 2007 reports were not available.