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Subject: Council Hearing Public Comment
Date: Friday, April 24, 2026 4:15:42 PM

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Submitted on Fri, 04/24/2026 - 4:15 PM

Name

Brandi Cole

Subject

Comment for the Hearing on Preferred Land Use Alternative for the County Comp Plan Update

Date of Hearing

Mon, 04/27/2026

Comment

My name is Brandi Cole and I am a resident of Clark County, residing in District 2. I am submitting a comment regarding the Preferred Land Use Alternative for the County Comp Plan Update.

Anyone who has read the 2025 Comp Plan Update Draft EIS should prefer Alternative 1. Alternative 1, which does not expand existing urban growth areas (UGAs), would be able to accommodate most projected growth within existing UGAs (DEIS, p. 16). Alternatives 2 and 3 which propose UGA expansions and upzoning of rural and agricultural resource lands are unacceptable solutions. While neither Alternative 2 or 3 are worth consideration, I will focus on Alternative 2 while noting Alternative 3 is worse..

Expansion of UGAs in Alternative 2 would reduce rural county land by 1,037 acres, lands with prime agricultural soils by 787 acres, and land with prime or good forest soils by 882 acres while rezoning 355 acres of agricultural land to urban designations (p. 39-40). Under the GMA, local jurisdictions are required to protect agricultural and timber lands (p. 24). Further, according to the Vacant Buildable Lands Model, Battle Ground, Camas, Ridgefield, and Washougal have enough capacity to meet their projected housing capacity targets (p. 123). If Clark County's projected growth can be accommodated within current UGAs with upzoning in urban areas, developing resource lands to accommodate growth is not only irresponsible, it directly ignores GMA requirements and our responsibility to future generations..

Most of the projected housing capacity deficit would be in the City of Vancouver and the Vancouver UGA (p. 124). Other cities like Battle Ground, Camas, and Washougal are projected to have significant surplus while Ridgefield, La Center, Woodland, Yacolt are projected to have single digit differences (p. 124). Sufficient upzoning in urban areas could help protect rural areas from development pressure (p. 124). Proper urban planning is critical. For example, Ridgefield is currently 79% single-family residential (p. 114). Increasing multi-

family units would reduce sprawl and conversion of resource land while potentially reducing single vehicle trips and emissions with proper planning for active transportation. Additionally, single-family homes tend to be more expensive, pricing out residents in lower income brackets (p. 113). It is obvious that upzoning and proper urban planning are the correct solutions—not encouraging more sprawl.

The majority of our projected employment deficit would be in the City of Vancouver and Vancouver UGA, with Battle Ground as an additional concern (p. 126). Although Alternative 2 anticipates significant increases in job capacity, it still falls short in Battle Ground where the majority of land use change would be industrial (41% increase) (p. 114). This stark increase in industrial land use, potentially as a means to increase employment, calls into question how much residents would benefit other than earning a paycheck. Additionally, increased industrial land use in Battle Ground would shift scenic rural integrity—a consideration of the GMA—and potentially increase occupational, environmental, and health risks for employees and residents. Again, proper zoning and urban planning are the correct solutions.

Expanding UGAs introduces other concerns. Less energy efficiency results from less compact urban forms with the main difference resulting from increased fossil fuel usage (p. 92-94). More compact urban areas better support alternative transportation modes meaning less cars, traffic, and emissions (p.93). “The primary energy conserving measure available to local jurisdictions has been to adopt a compact urban form that supports alternative, energy-efficient transportation (walking, bicycling, and transit) (p. 98).” Expanding UGAs would also create broader service areas, requiring increased infrastructure and services as well as increasing resource demands (p. 199-201). Clearly, compact urban areas as achieved through Alternative 1 would have multiple benefits over the other alternatives.

Additionally, expanded UGAs in Alternative 2 would decimate an additional 248 acres of riparian habitats, 34 acres of non-riparian habitats, 4 fish-bearing stream miles, and 2 non-fish-bearing stream miles (p. 83). Forest canopy in non-forestland areas could also be lost due to development (p. 95). Again, Alternative 1 is the clear choice—“because this alternative would accommodate most of the projected growth over the next 20 years without expanding into rural areas, it would have less potential impact on priority habitats and species than under Alternatives 2 and 3. (p. 81, 82)”

Alternative 2 also significantly increases other risks.. Earthquake and landslide areas, land with steep slopes, and erosion risk would increase (p. 42). Risks to groundwater quality and quantity would also increase (p.66). Conversion of rural habitat would impact fish and wildlife, including sensitive, threatened, and endangered species and migratory habitat and species (p. 79). Remaining wildlife habitats may be fragmented, having further impacts on plants, fish, and wildlife (p. 83). Increased noise due to the expansion of development into rural areas and the loss of natural noise buffers can have significant public health impacts (p. 104-105). We can accommodate all necessary growth in Alternative 1, so we could and should avoid these risks.

In terms of climate change, reducing our rural lands including agricultural lands, riparian and non-riparian habitats, streams, and potentially forest canopy to accommodate what would essentially be urban sprawl is blatantly irresponsible. Developing these lands will not only reduce our climate change resiliency and food security, but contribute to climate change by reducing carbon sequestration and increasing impervious surfaces. Once we develop these lands and destroy habitats, they are gone forever.

Section 3.3 obviously seeks to position Alternative 1 as having the most significant negative air and climate impacts due to higher vehicle traffic. However, a strong argument could be made for more compact urban forms increasing the use of active transportation—as noted previously in this comment. It is a reasonable assertion that vehicle use could be reduced for Alternative 1 with proper urban planning including increased public transit and thoughtful

active transportation infrastructure. Clark County should take full advantage of federal assistance in developing more transportation options, particularly alternative transportation modes (p. 158). Responsible climate change planning means reducing our dependency on and planning around cars and single vehicle drivers.

In summary, Alternative 1 is not only the clear choice, it is the only choice if we want to ensure a thriving, equitable, and sustainable Clark County. All projected growth can be accommodated in existing cities and UGAs. Developing compact urban forms and protecting resource lands is the responsible choice economically and environmentally. I love Clark County and I know you do, too. Please make the responsible choice by reducing urban sprawl and protecting our rural and agricultural lands.



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