

From: [Jeffrey Delapena](#)
To: "Clark County Citizens United, Inc."
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: RE: The proposed Clark County Comprehensive Plan is woefully inadequate.
Date: Monday, April 27, 2026 8:29:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Carol,

Thank you for submitting CCCU's comments regarding the Council Hearing to select the Preferred Alternative for the 2025 Comprehensive Plan.

I am forwarding to additional members of Staff ahead of today's Hearing. This will also be added to the Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Clark County Citizens United, Inc. <cccucn@yahoo.com>

Sent: Monday, April 27, 2026 4:37 AM

To: Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>

Subject: The proposed Clark County Comprehensive Plan is woefully inadequate.

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April 26, 2026

Clark County Council
P.O.Box 5000
Vancouver, Washington 98666

FOR THE PUBLIC RECORD OF THE COMPREHENSIVE PLAN

Re: The proposed Clark County Comprehensive Plan is woefully inadequate.

Dear Councilors,

Clark County Citizens United, Inc., (CCCU) , representing approximately 6,000 members who reside in Clark County, believe the proposed Clark County Comprehensive Plan is woefully inadequate. The Plan clearly ignores the intent of the Growth Management Act, (GMA) when it fails to plan for 50% of its people in the rural and resource areas of the county. The proposed Plan, alongside information taken from various Growth Management Act agencies and laws, demonstrates the almost total disregard afforded legal mandates and directives under the GMA and corrections must be made.

According to state law, the process is to be a "county wide" process.

Clark County has only planned for approximately 50% of the total population, while using the total Office of Financial Management (OFM) population projection, just in the urban areas. There is little or no planning, being proposed for the rest of the other 50% of the county population that is contained in the rural and resource areas, outside of the urban and unincorporated areas. Staff used artificial numbers, (90/5), to justify that 95% of the population is to go to the urban area and 5% to the rural area. But that number only reflects the fact that rural available lots are almost used up, and no new lots for rural housing are being planned. That kind of formula was used in the 1994 Plan and deemed illegal in a 1997 Superior Court ruling and upheld in 1999, in a Court of Appeals Published Opinion. Clark County has ignored those court orders. OFM projections are to be used for the entire population of the county and planning must adhere to the OFM number that was allotted to Clark County. That number can be exceeded but cannot be less. **Clark County has failed to comply with this state law.**

Washington state law states, "Under [RCW 36.70A.020](#), the GMA establishes a series of 15 goals that should act as the basis of all comprehensive plans. The GMA specifically notes in the statute that the goals "are not listed in order of priority and shall be used exclusively for the purpose of guiding the development of comprehensive plans and development regulations." Below you will find a list of those goals along with an abbreviated description (for the full descriptions, see [RCW 36.70A.020](#)).

1. Goal 1 Urban growth states, "Encourage development in urban areas."

This goal does not say to limit development to only urban areas. Clark County has not recognized the meaning of the word "encourage" but instead given it a whole new meaning in the Comprehensive Plan. This word has been coupled with the words "preserve" and "preservation", thereby justifying the inability of the rural and resource areas to grow and prosper. The Plan is not recognizing the affordable housing needs of the rural and resource areas. **Clark County has failed to comply with this state law.**

2. Goal 4 Housing. Plan for and accommodate housing affordable to all economic segments.

Because of the massive downzoning in 1994, rural and resource land that had been available for rural and resource housing, quickly became unavailable and unaffordable. This economic segment of the population has been totally ignored, while the landowners in these areas must pay outrageous amounts of property tax for land that cannot be used for housing or economic gain. This shortage of rural and resource housing has driven up the cost of the land so much that those wanting to live a rural or resource lifestyle cannot afford to do so. **Clark County has failed to comply with this state law.**

3. Goal 5 Economic development states, "Encourage economic development throughout the state."

Without rural and resource housing growth, there is no economic development in rural and resource areas. For economic growth to occur, the people creating that growth must be able to live on the land. Clark County has constricted the land in those areas for over 30 years with such unreasonable zoning, that it makes it impossible for economic development to occur. The only way to encourage economic development in these areas is to change the zoning, to make the land affordable and attainable. **Clark County has failed to comply with this state law.**

4. Goal 6 Property rights states "Private property shall not be taken for public use without just compensation having been made."

Clark County took private property by way of a massive downzoning in 1994, that financially crippled landowners. The intent was to "preserve" that land for whatever the county would deem necessary in the future. That zoning has not changed since that time and none of those landowners have been given just compensation for the regulatory "takings". In addition, another layer of takings has affected hundreds of parcels when Clark County imposed permanent Conservation Covenants over entire parcel deeds, when only a small portion of the land was affected by environmental regulations. **Clark County has failed to comply with this state law.**

5. Goal 7. Permits. Applications should be processed in a timely and fair manner.

Clark County has failed miserably in this goal, but even to a much greater degree in the rural and resource areas. CCCU has been contacted by dozens of landowners who are trying to build a home, shop or barn, only to be ignored by the county. They complain that the county refuses to work with them and refuses to communicate at all. Many months and years go by and still they have not gotten resolution. Their project simply goes into limbo, with no end in sight. **Clark County has failed to comply with this state law.**

6. Goal 8. Natural resource industries. Maintain and enhance natural resource-based industries.

Because Clark County refuses to allow any additional growth in these areas, natural resources cannot be enhanced. In many cases, when the resource industry owner retires, the price of land is so high that it is financially impossible for a new owner to buy the resource land and continue its operation. Minerals are one of the resources that is included in the GMA list, but Clark County has prevented enhancement of this industry by way of improved transportation and equipment. **Clark County has failed to comply with this state law.**

7. Goal 11. Citizens participation and coordination. Encourage the involvement of citizens

Clark County ignores the word "involvement", unless the involvement agrees with its planning agenda. Thousands of articles of CCCU testimony regarding the Comprehensive Plan was sent to the county, only to be ignored. For the most part, such testimony isn't even acknowledged. There is clearly no ability to participate in the planning process for the majority of citizens living in the county, particularly the rural areas, unless it comes from a select environmental group. Yet, outside testimony is often highly regarded when it too, fits that agenda. **Clark County has failed to comply with this state law.**

GMA Goals (RCW 36.70A.020)

1. **Urban growth.** Encourage development in urban areas.
2. **Reduce Sprawl.** Reduce the inappropriate conversion of undeveloped land.
3. **Transportation.** Encourage efficient multimodal transportation systems.
4. **Housing.** Plan for and accommodate housing affordable to all economic segments.
5. **Economic development.** Encourage economic development throughout the state.
6. **Property rights.** Private property shall not be taken for public use without just compensation having been made.
7. **Permits.** Applications should be processed in a timely and fair manner.
8. **Natural resource industries.** Maintain and enhance natural resource-based industries.
9. **Open space and recreation.** Retain open space, enhance recreational opportunities.
10. **Environment.** Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
11. **Citizen participation and coordination.** Encourage the involvement of citizens.
12. **Public facilities and services.** Ensure that those public facilities and services necessary to support development shall be adequate.
13. **Historic preservation.** Identify and encourage preservation.
14. **Climate change and resiliency.** Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies adapt to and mitigate the effects of a changing climate.
15. **Shoreline management (RCW 36.70A.480)**

Clark County Citizens United, Inc. has won in the courts against Clark County and the Comprehensive Plan, to no avail. CCCU has submitted thousands of items of testimony over items in the Plan that have also been ignored. Clark County even repealed an adopted Alternative 4 that would have complied with all the GMA goals, because of political reasons. In the meantime, prices continue to skyrocket, landownership decreases, affordable housing becomes a thing of the past, and resource enhancement is vanishing. Clark County needs to adopt a Plan that complies with all of the GMA Planning goals, countywide. To date, that has not occurred. CCCU is waiting for Clark County to be compliant, not only to the goals, but also to the courts and other state mandates regarding housing and the economy. This Clark County Comprehensive Plan must be changed to be fair and equitable for all.

Sincerely,

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

Washington State Department of Commerce

<https://deptofcommerce.app.box.com/s/wpji10w5zmvnch3rrmeh2ajbxbp7s2h0i>

GOALS, POLICIES, AND MANDATORY PROVISIONS

The following goals are adopted to guide the development and adoption of comprehensive plans and development regulations of those counties and cities that are required or choose to plan under RCW 36.70A.040.

(4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

WHAT DOES IT MEAN TO “PLAN FOR AND ACCOMMODATE”?

Proposed minimum standard

- ; Develop a housing element that fully addresses all listed items in RCW 36.70A.070: GMA requirements (including HB 1220 changes)
- ; Ensure that development regulations are consistent with and implement the GMA goals and requirements of the act, CPPs, and the comprehensive plan.
- ; Consider and apply appropriate tools to meet the jurisdiction’s allocated housing needs, such as incentives to encourage and facilitate housing at all affordability levels.

Commerce will provide guidance for how to do and demonstrate each of the above.

DRAFT GUIDANCE FOR ALLOCATING PROJECTED HOUSING NEEDS TO LOCAL JURISDICTIONS

While the changes in HB 1220 include significant and meaningful new comprehensive planning requirements, **it does not change the fundamental way in which communities plan under GMA.** Counties and cities must now plan for and accommodate the categories of housing need outlined above. **This means they must show that they have adequate capacity at appropriate levels of density** as well as policies in place for supporting and enabling housing production at each affordability level, including those that are below market rate. Forthcoming guidance from Commerce will outline these requirements as well as guidance for implementation in more detail.

Minimum Standards for Allocating Projected Housing Needs

While counties and local jurisdictions can choose any method to allocate countywide projected housing needs. There are some minimal standards that define an appropriate allocation:

1. The county must select a total housing need projection within the range of the Low, Medium and High countywide housing needs projections published by Commerce. The selection must be consistent with the selected OFM population projection. For example, if the county selects the Medium OFM population projection, then it must also select the Medium Commerce housing needs projection.
2. The selected countywide housing need projection for each income level and special housing needs must be consistently derived from the same Commerce projection series. For example, if the county selects the Medium total housing needs projection, then it must select the Medium projection for all income levels and special housing needs. It is not appropriate to select a Low projection for housing needs at 0-30% of AMI along with a High projection for housing needs for >80-120% of AMI.
3. The sum of all allocated housing needs to local jurisdictions in a county must be equal to or greater than the total countywide housing need projection. This should be true for each income level, PSH and emergency housing

OFM - 2020 to 2050 – Growth Management Act population projections for counties

	2020	2021	2022	2025	2030	2035	2040	2045	2050
									503,311,151,100,520,900,543,507,583,307,622,329,660,653,698,416,735,724
Clark	503,311	513,100	520,900	543,507	583,307	622,329	660,653	698,416	735,724

Figure 8 shows the geographic distribution of annual population change by county. Whitman and King were the fastest-growing counties in 2025 at 1.4% growth, followed by Spokane, Clark, and Whatcom all coming in at over 1.0% growth. In 2025, only five counties experienced growth exceeding 1.0%, down from 14 in 2024. Figure 8. Distribution of annual population change by county, 2025

The population of incorporated places totaled 5,350,840 on April 1, 2025, an increase of 62,300 people since last year. Most of the population growth in incorporated areas was due to natural change and net migration rather than annexation (boundary changes). Of the total increase in incorporated area population, annexation only accounted for 560 people. The total unincorporated area population increased by 17,100 people over the previous year. **The five most populous unincorporated county areas** (Pierce, Snohomish, King, Clark, and Kitsap, respectively) **have almost as much population as the five largest cities in the state** (Seattle, Spokane, Tacoma, Vancouver, and Bellevue, respectively): 1.51 million versus 1.64 million.

Statewide, 68% of all new housing units in 2025 were multifamily structures, up from 57% in 2021. **The number of new one-unit or single-family structures has declined from 18,400 units in 2021 to 14,400 in 2025.**

OFM population estimates are developed using a variety of state and local government data. They are based on the most recent federal census counts with annual change added by monitoring changes in births, deaths, housing supply, school enrollment, voter registrations, motor vehicle registrations and employment.

[2025 Population Trends](#)

[The total unincorporated area population increased by 17,100 people over t](#)

[2025 Population Trends - Office of Financial Management](#)

The Office of Financial Management (OFM) develops **population** estimates each year as of April 1 for release in July. OFM has prepared these estimates every year for more than five decades for use by many **state** laws that allocate funds, determine program eligibility, and establish county participation

Clark County Population projection from OFM

HIGH 791,809

MIDDLE 698,416

LOW 576,151 (Source: <http://ofm.wa.gov/pop/gma/>)

April 1, 2025 Population of Cities, Towns and Counties Used for Allocation of Selected State Revenues State of Washington

Clark 542,400

Unincorporated 245,750

Incorporated 296,650

The Growth Management Act (GMA) in Washington State defines unincorporated areas as those outside the designated urban growth areas, where urban growth is not encouraged. These areas are typically characterized by rural or natural land uses.

Definition of Unincorporated Areas Under the GMA

Urban Growth Areas

- The Growth Management Act (GMA) in Washington State designates specific regions known as Urban Growth Areas (UGAs).
- These areas are intended to accommodate urban growth and development.

Unincorporated Areas

- **Unincorporated areas are defined as those regions outside the designated UGAs.**

Definition of Unincorporated Areas in Washington

What Are Unincorporated Areas?

In Washington, unincorporated areas are regions that do not have their own local municipal corporation. This means they are not part of any city or town. Instead, these areas are managed at the county level, which provides necessary services and governance.

Governance and Services

- **County Management:** Unincorporated areas rely on the county government for services such as law enforcement, road maintenance, and zoning.
- **Population Projections:** The Office of Financial Management (OFM) includes unincorporated areas in its population estimates and projections, which are important for state program administration and revenue allocation.

Importance in Population Projections

Understanding the distinction between incorporated and unincorporated areas is crucial for analyzing population trends, especially in cities like Vancouver, Washington. The OFM's projections help in planning and resource allocation for both incorporated cities and unincorporated regions.

County Census Population 2020 April 1 Population 2024 April 1 Population 2025 Numeric Change 2020-25 Percent Change 2020-25 Births 2020-25 Deaths 2020-25 Natural Change 2020-25 Net Migration 2020-25 Rank by

Clark* 503,311 536,300 542,400 39,089 7.77 27,726 22,512 5,214 33,875

NOTE: THE EMAIL ADDRESS NOTED IN THE COUNTY WEB SITE AND NOTIFICATIONS FOR THE APRIL 27, 2026 COMMENTS WILL NOT GO THROUGH IN AN EMAIL. PLEASE MAKE CORRECTIONS. www.clark.wa.gov/councilors/public-comment

Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604 E-Mail cccuinc@yahoo.com