

From: [Jeffrey Delapena](#)
To: [Bryan Snodgrass-Vancouver](#)
Cc: [Rebecca Kennedy](#); erik.paulsen@cityofvancouver.us; [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: FW: City of Vancouver letter for Clark County Planning Commission and City Council
Date: Thursday, June 18, 2026 3:17:00 PM
Attachments: [26 06 18 COV ltr to County CC and PC on policies.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Bryan,

Thank you for providing the City of Vancouver's feedback related to tonight's Planning Commission Work Session regarding the Comprehensive Plan Chapter Review.

I am forwarding to additional members of Staff, including Rebecca Messinger with the Council's Office per your request. Your comments will be brought to the attention of the Planning Commission ahead of tonight's meeting. This will also be added to the Index of Record.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Thursday, June 18, 2026 3:10 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Karl Johnson (Planning Commission Member) <karl.johnson@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>
Cc: Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>; Paulsen, Erik <E.Paulsen@cityofvancouver.us>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez

<Jose.Alvarez@clark.wa.gov>

Subject: City of Vancouver letter for Clark County Planning Commission and City Council

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.

Hi Jeffrey

Can you please provide this letter from the City of Vancouver on policies to the County Planning Commission for tonight's workshop, and to the County Council in advance of their next workshop? Thanks very much.



June 18, 2026

RE: New or updated County Comprehensive Plan language for policies applying to UGAs and Cities

Honorable Chairs Marshall and Johnson, and County Councilors and Planning Commissioners

Thank you very much as always for the opportunity to comment as the Comprehensive Plan update shifts from selection of the Preferred Alternative map to the County Comprehensive Plan text and policies. It is understood that some further map adjustments may be needed in the final adoption, as there remains a countywide surplus of land, with more capacity than needed to meet the Council's adopted long term growth targets.

Much of the text and policies of the proposed County Comprehensive Plan document does not significantly impact Vancouver, but we want to flag four policies that need additional changes and refinement. Added language on these is recommended to ensure important concepts from the current Comprehensive Plan update are implemented after the Plan is adopted. Our suggestions are intended to provide flexibility for the County and Cities in how they are implemented. Please consider the following:

- 1. Our highest priority is the addition of further language in proposed new County Comprehensive Plan policy 1.4.1 on connected and accessible community to facilitate less dense options in more remote parts of the unincorporated Vancouver UGA:**

Proposed amendment to the County's new policy 1.4.1 of the Land Use Element

County proposed policy: Plan for connected and accessible communities in the unincorporated Vancouver urban growth area where a significant majority of daily needs can be met within a convenient and safe walk, ride, roll, or transit ride by planning for amenity-rich activity centers and corridors, areas of dense, mixed-use urban development, neighborhood-scale commercial opportunities, and safe connections between destinations.

City proposed addition at the end: Also plan for incremental additions of shopping, employment, and other amenities in lower density areas of the VUGA located far from these uses.

The County's proposed new policy is welcome and needed in the Vancouver UGA, but it is incomplete, and appears to call for dense mixed use development in all corners of the VUGA. Additional guidance is needed about the many parts of the VUGA that are proposed to be zoned only for single family housing with no close shopping or employment opportunities, forcing residents into long drives of a mile or more for daily needs and making it difficult for people who rely on transit or other non-driving modes to access essential services. High density in these areas may not be appropriate in the coming years, but small steps can and should be taken to bring some amenities and services closer.

By not making any distinctions between parts of the VUGA, the County's proposed policy as written implies that improvements in higher density areas like Highway 99 allow it to meet this policy without making any incremental changes elsewhere in the VUGA. We are suggesting an incremental policy that broadly recognizes that not all areas are the same, but does not attempt to get into specifics.

This proposed County policy was not reviewed by City staff. We understand it was drafted by the Climate Action Group, but do not believe it was intended to allow for the potential exclusion of lower density areas of the VUGA, or to assume that they would be turned into high density areas. We will reach out to confirm. Maintaining large swaths of the VUGA as residential only enclaves will have significant negative impacts to climate adaptation and efforts to increase access to opportunities and services, and compliance with new GMA requirements.

2. Although lower in priority, we offer some suggested language for consideration on three Countywide Planning Policies that apply countywide. These Countywide Planning Policies were reviewed to varying degrees by the Technical Coordinating Committee of local jurisdiction's staff, but consensus was not reached:

A. Update the third bullet of proposed Countywide Planning Policy 1.1.14 on employment land conversions with simpler and clearer language giving the County and Cities more flexibility.

County proposed language: *Consider rezoning of employment center lands to non-retail commercial or business park if the proponent can show that (a) the zone change would accommodate unforeseen and rapidly changing commercial development needs and (b) the proposed designation is more suitable than the current designation given the land's site-specific characteristics and (c) the proposed zone change will generate greater economic benefit than the current comprehensive plan zone allocation.*

City suggested replacement: *Limit rezoning of employment land to other predominantly non-employment zones to cases where no overall negative economic impact is demonstrated, or where other overriding community benefits are provided.*

Rationale: Vancouver supports efforts to generally discourage rezoning of employment lands, but the proposed language is unclear and outdated, and might prevent review of otherwise appropriate rezones. The County language says to consider rezoning under

certain circumstances, but doesn't say what should happen if those conditions aren't met. It doesn't say what to do about rezones that are located outside of centers. It also doesn't say what to do about rezones to retail or industrial land. Most of the County proposed language dates back many years to past update cycles. We propose simpler, less confusing language that states the general value but doesn't attempt to be precise about what specific type of commercial land is subject to the policy unless there is a reason to do so. We also believe it is important to recognize that there may be some unusual situations where local governments should be able to consider a rezone from employment zoning to some other type of zoning. It is important to note that in such cases local government elected officials would still be able to decide, and that a public hearing would still be required to allow for public and stakeholder input.

B. Adopt different new Countywide Planning Policy 1.1.24 for TDRs that fully commits to exploration, but not to adoption or implementing details until basic program feasibility and parameters are better known

County Proposed Language: *Clark County and participating cities shall work cooperatively to adopt a countywide transfer of development rights (TDR) program to support mutually agreed upon conservation goals (i.e., the preservation of agricultural lands) and require that any expansion of any urban growth boundary shall require participation in the program. When Clark County expands an urban growth boundary contingent upon the use of the TDR program, the county and the participating city shall enter into an interlocal agreement that, at a minimum, includes the following provisions:*

- *Establishing requirements for completing expansions to the urban growth boundaries contingent upon the transfer of development rights from eligible sending areas designated by the county to the receiving areas created by the expansion.*
- *Setting timelines for full implementation of the transfer of development rights program and any requirements or limitations placed on the expansion area until such a time as a TDR program is implemented.*
- *Identifying guidelines for monitoring, reporting, and reassessing market conditions.*

City suggested replacement: *Explore a regional Transfer of Development Rights (TDR) program in consideration of program scope and goals, market feasibility, implementation mechanisms, and implications for housing affordability and HB 1220 compliance, resource conservation, and long term urban form. Allow cities to opt in or out on behalf of their jurisdictional area and UGA.*

Rationale: The City of Vancouver supports exploration of a TDR program and might wish to participate, but doesn't support policy language at this time that commits to implementing one or commits to key program specifics until the local feasibility of a program and its parameters have been studied. TDRs have promise, but also a mixed history, with programs having been considered twice previously by Clark County but then dropped. According to [testimony](#) in the current record they have been adopted in some other Washington jurisdictions but without positive results. Under the proposed language the City of Vancouver would not be obligated to participate in a program, but given its size and the need for any program to generate market activity, a future

County Council might feel they needed to include the VUGA given its size. Our concerns about program complexity and implications are heightened by the fact that the TDR approach discussed so far is unusual, with both sending and receiving areas located in UGA expansion areas. We aren't wedded to our exact replacement language but suggest something that moves the issue forward but has us all look before we leap.

C. Amend Countywide Planning Policy 12.01 to reflect the reality that most local City or County Comprehensive Plans will not realistically be able to designate individual annexation areas in their Annexation Elements.

County proposed language with City suggested deletion: *Community Comprehensive Plans shall contain an annexation element. ~~In collaboration with adjacent cities, towns and Clark County, each city and town shall designate areas to be annexed.~~ Each city and town shall adopt criteria for annexation and a plan for providing urban services and facilities within the annexation area. Policies for the transition of services shall be included in each annexation element. All cities and towns shall phase annexations to coincide with their ability to provide a full range of urban services to areas to be annexed.*

Rationale: Like some other policies, the language in this case dates back several years to past cycles and needs updating in our view. In 2007 Clark County and the City of Vancouver adopted an Annexation Blueprint which did identify in advance annexation areas, but it expired in 2017, and its experience showed it was not realistic to attempt to that kind of precision in advance. Vancouver's recently adopted Comprehensive Plan did not attempt to define specific future annexation areas in its Annexation Element, and to our knowledge the proposed Comprehensive Plans of the County and small Cities don't either. Unless the recommended deletion is made, all jurisdictions might have an inconsistency between their Plans and the Countywide Planning Policies. More practically, keeping the proposed language could create an impression to the public, particularly in potentially impacted communities, that local governments have in fact identified specific areas. When no such advance identification can be found, it can create an impression of lack of transparency.

Thank you again for your consideration. We may submit additional information as the Comprehensive Plan policies and text move to public hearings, but wanted to provide the recommendations as you begin your discussions, particularly regarding the higher priority VUGA-only policy.

Sincerely,

A handwritten signature in dark ink, appearing to read "Erik W. Paulsen", with a stylized flourish at the end.

Erik Paulsen, Vancouver City Councilmember