From:	Cnty 2025 Comp Plan
To:	Ann Foster; Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez
Subject:	FW: Comments regarding August 20 public hearing on 2025 Comp Plan Update
Date:	Thursday, August 20, 2026 8:53:00 AM
Attachments:	Futurewise Comments_Planning Commission_7_31_26.pdf image001.png image002.png image003.png image004.png

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Good day, Ann,

Thank you for submitting comments ahead of tonight's Public Hearing for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of staff. These comments will be added to the Index of Record and brought to the attention of the Planning Commission.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Ann Foster <annfoster5093@gmail.com>
Sent: Wednesday, August 19, 2026 1:10 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Comments regarding August 20 public hearing on 2025 Comp Plan Update

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Dear Chair Johnson and Planning Commissioners:
My name is Ann Foster and I am speaking as an independent resident.

As always, the public appreciates the opportunity to comment on the final stages of the Comp Plan Update, with the hope that you will utilize feedback from us in your recommendations to the Clark County Council.

I am addressing only the Climate Element, Chapter 14.

Most importantly, and in consideration of my experience on the Climate Advisory Group, I wish to address the importance of this Chapter and the importance of your role in meeting the needs of Clark County, the State of Washington and the World by taking **urgent** actions to put into place the goals and policies regarding greenhouse gas emissions, vehicle miles traveled, resilience and environmental justice goals and requirements.

My opinion, speaking independently, is that the wording in the goals needs to be stronger to place accountability on our local government to take action that will build resilience, enabling us to survive severe impacts of climate change - which are already in progress.

Specifically, I support and will reiterate, in summary, some of the strategies recommended to you by

Futurewise in its comments submitted July 30 of this year, (attached below):

- Electrify 100 percent of the new buildings by 2050.
- Reduce energy use in existing buildings by 45 percent by 2050.
- Electrify existing buildings with 95 percent of buildings using fossil fuels converted to electricity by 2050.
- Reduce industrial emissions by 50 percent by 2050.
- Reduce passenger vehicle miles traveled by 2050.
- Adopt a policy that phases out gas-powered landscaping equipment, such as gas-powered leaf blowers.
- Reduce tree loss by 90 percent by 2050.
- Adopt updated regulations that protect and enhance natural areas, to protect and enhance community resiliency and to address the natural hazards (this from RCW 36.70A.130(1)
- Remove barriers that inhibit local food-producing farms; per Futurewise, "the Land Use Element, the Future Land Use Map, and the Rural Element should better protect working farms." The ability to provide local sources of meat as well as specialty crops will remain critical to the health and well being of our communities.

I appreciate the guidance that Futurewise has provided in pointing out the work that needs to be done in the 2025 Plan to not only meet the new requirements of the law, but also stresses the importance of your recommendation to the Council. Hopefully, each of you have had a chance to review it.

Best regards,
Ann Foster
La Center, WA

1201 3rd Ave Suite 2200, Seattle, Washington 98101
p. (206) 343-0681
futurewise.org

July 30, 2026

Karl Johnson, Chair
Clark County Planning Commission
Clark County Community Planning
PO Box 9810
Vancouver, Washington 98666-9810

Dear Chair Johnson and Planning Commissioners:

Subject: Comments on Chapter 1 Land Use Element, Chapter 2 Housing Element, Appendix I Climate Element Resource Documents, and Appendix K-Density Targets of the Clark County Comprehensive Plan Update
Sent via email: comp.plan@clark.wa.gov; jeffrey.delapena@clark.wa.gov;

Thank you for the opportunity to comment on the Introduction, Chapter 1 Land Use Element, Chapter 2 Housing Element, Appendix I Climate Element Resource Documents, and Appendix K-Density Targets of the Clark County Comprehensive Plan Update. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters across Washington State including in Clark County.

This letter will first summarize our recommendations. It will then provide more detailed comments to support the recommendations.

Summary of the Recommendations

Futurewise has the following comments and recommendations on the Introduction, Chapter 1 Land Use Element, Chapter 2 Housing Element, Appendix I Climate Element Resource Documents, and Appendix K-Density Targets:

- Futurewise strongly supports including a Tribal Land Acknowledgement that has the agreement of the Tribes and Indian Nations affected by the county comprehensive plan.
- Because urban area expansions are not needed, the Land Use Element and Future Land Use Map cannot expand the urban growth areas (UGAs). Expanding the UGAs would violate the Growth Management Act (GMA). Please see page 3Because urban area expansions are not needed, the Land Use

Element and Future Land Use Map cannot expand the urban growth areas (UGAs). of this letter for more information.

- The UGAs must not be expanded onto agricultural lands of long-term commercial significance and the Land Use Element and Future Land Use Map should designate the "Agricultural Land Base" lands that meet the criteria for agricultural lands of long-term commercial significance as agricultural lands of long-term commercial significance. This is necessary to comply with the GMA. Please see page 4 of this letter for more information.
- The Land Use Element and Future Land Use Map must designate adequate land for affordable housing within the existing urban growth areas (UGAs). This is necessary to comply with the GMA. Please see page 5 of this letter for more information.
- The Land Use Element and Future Land Use Map should focus these densities and housing units in transit-oriented development locations within the UGAs. This is necessary to comply with the GMA. Please see page 6 of this letter for more information.
- The Land Use Element, the Future Land Use Map, and the Rural Element should better protect working farms. This is needed to better protect farmers and the agricultural industry. Please see page 7 of this letter for more information.
- The comprehensive plan housing element and the development regulation updates must identify sufficient land for housing affordable to the zero to 30, 30 to 50, 50 to 80, 80 to 100, and 100 to 120 percent of the Area Median Income (AMI) income bands or categories for unincorporated Clark County. This is necessary to comply with RCW 36.70A.070(2). Please see page 8 of this letter for more information.
- The comprehensive plan and development regulations should incorporate the strategies identified in the *Clark County 2022 Greenhouse Gas Emissions Analysis* to reduce greenhouse gas pollution not included in the comprehensive plan and development regulations. This is necessary to comply with the GMA requirements for the greenhouse gas emissions reduction subelement. Please see page 10 of this letter for more information.
- Reduce planned rural growth and capacity. This will help protect the environment and comply with the GMA. Please see page 15 of this letter for more information.
- Some of the resiliency subelement provisions do not comply with RCW 36.70A.070(9)(e)(i). So they do not comply with the GMA requirements for the resiliency subelement. Please see page 19 of this letter for more information.

- This update needs to include development regulations to implement the new climate goals and policies. This is required to meet community needs and to comply with the GMA. Please see page 20 of this letter for more information.
- Many of the densities in Appendix K-Density Targets are too low to provide housing affordable to families earning 80 percent or less of the Area Median Income (AMI). This means that jurisdictions will not be able to "[i]dentif[y] sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households" or "[m]ake[] adequate provisions for existing and projected needs of all economic segments of the community" as RCW 36.70A.070(2)(c) and RCW 36.70A.070(2)(d) require. Please see page 21 of this letter for more information.

Detailed Recommendations

Comments on the Introduction

Futurewise strongly supports including a Tribal Land Acknowledgement that has the agreement of the Tribes and Indian Nations affected by the county comprehensive plan.

Comments on Chapter 1 Land Use Element

Because urban area expansions are not needed, the Land Use Element and Future Land Use Map cannot expand the urban growth areas (UGAs).

The Washington State Supreme Court wrote "we hold a county's UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by [the Washington State Office of Financial Management] OFM, plus a reasonable land market supply factor."[1] A comparison of the total 2023-2045 housing unit needs in the *2025 Population, Housing and Employment Allocation – Issue Paper 5* with the "2023 VBLM Capacity" shows that existing capacity can accommodate or is within a few housing units of accommodating the planned housing growth.[2] And the cities and unincorporated urban growth areas will likely

[1] *Thurston Cnty. v. W. Washington Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 352, 190 P.3d 38, 49 (2008).
[2] Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 *2025 Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5; Clark County 2025 Allocation based on VBLM and HAPT Method A p. *1 last accessed on June

need to increase their capacity for low-rise multifamily and mid-rise multifamily dwellings to meet the affordable housing requirements which will increase the housing capacity in the cities and unincorporated urban growth areas.[3] Further, Vancouver, Camas, and Washougal were required to adopt their new middle housing zoning by December 31, 2025, further increasing their housing capacity.[4] So, there is no need to expand the county's urban growth areas. Without a need to expand the urban growth areas, Clark County lacks the legal authority to expand the urban growth areas (UGAs).[5]

The UGAs must not be expanded onto agricultural lands of long-term commercial significance and the Land Use Element and Future Land Use Map should designate the "Agricultural Land Base" lands that meet the criteria for agricultural lands of long-term commercial significance as agricultural lands of long-term commercial significance.

The *Clark County Agricultural Lands Study* documents "that 98 percent of the 101,844-acre Agricultural Land Base (99,900 acres) is classified as having Prime or Statewide Importance soils. A nearly identical share, 96 percent (31,400 acres), is found within the existing 32,589-acre Agricultural Designations. This near-universal prevalence indicates that from a soil-capability perspective, the vast majority of lands identified in the study area are physically well-suited for agricultural production."[6] The other factors also show that these lands qualify as agricultural lands of long-term commercial significance.[7] The Land Use Element

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17, 2026, at: https://clark.wa.gov/sites/default/files/media/document/2024-02/Allocation%20Housing_Method%20A.pdf and at link on the last page of this letter with the filename: "Allocation Housing_Method A.pdf."

[3] Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026) last accessed on June 17, 2026, at: https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/ and at the link on the last page of this letter with the filename: "1220_Book2_Housing Element Update_230823 Final_updated 260112.docx."

[4] Washing State Department of Commerce Middle Housing Update Deadlines last accessed on April 23, 2026, at: https://deptofcommerce.app.box.com/s/bv7g03x1h176hwy2lgm8chraykr8ki50 and at the link on the last page of this letter with the filename: "Middle Housing Update Deadlines by Year - Updated May 2025.pdf."

[5] *Thurston Cnty. v. W. Washington Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008).

[6] ECOnorthwest, *Clark County Agricultural Lands Study* pp. 62 – 63 (Clark County Planning & Development Department: Nov. 2025) last accessed on June 17, 2026, at: https://clark.wa.gov/sites/default/files/media/document/2025-11/final-agricultural-lands-study-technical-report-2025.11.04-1.pdf and at the link on the last page of this letter with the filename: "final-agricultural-lands-study-technical-report-2025.11.04-1.pdf."

[7] *Id.* pp. 66 – 73.

and Future Land Use Map must retain the existing agricultural lands of long-term commercial significance designation and add the "Agricultural Land Base" that meet the criteria for agricultural lands of long-term commercial significance to the designated agricultural lands of long-term commercial significance.

The 519 acres that Ridgefield and La Center are requesting to pave over forever are prime agricultural lands and farmlands of statewide importance and meet the other criteria for agricultural lands of long-term commercial significance.[8] Consequently, these lands cannot be legally dedesignated under WAC 365-190-040(10)(c). Since the lands cannot be dedesignated legally, they cannot be legally added to the UGAs unless the land added has been protected for agricultural use through the adoption of a purchase or transfer of its development rights.[9]

In the past Clark County was able to dedesignate agricultural lands of long-term commercial significance that continued to meet the criteria and have them annexed before the Growth Management Hearings Board and the courts found that these dedesignations violated the Growth Management Act. That is no longer possible because dedesignations and urban growth area expansions do not take effect until after the Growth Management Hearings Board appeals are resolved.[10] So, dedesignations that violate state law are now a waste of time and money as they will be appealed and overturned and cannot be annexed during the appeal period.[11]

The Land Use Element and Future Land Use Map must designate adequate land for affordable housing within the urban growth areas (UGAs).

RCW 36.70A.070(1) requires that the comprehensive plan "shall" include a land use element [and map] designating the proposed general distribution and general location and extent of the uses of land, where appropriate, for agriculture, timber production, housing, ... The land use element shall include population densities, building intensities, and estimates of future population growth." The State of Washington Department of Commerce has documented that to provide housing affordable to families and individuals earning 80 percent or less of the area median income requires low-rise multifamily and mid-rise multifamily housing

[8] *Id.* pp. 62 – 73.
[9] RCW 36.70A.060(5).
[10] RCW 36.70A.067.
[11] RCW 36.70A.067.

and potentially accessory dwelling units.[12] To provide housing affordable to families earning more than 80 to 120 percent AMI requires townhomes, duplexes, triplexes, and quadplexes.[13] These multifamily housing types are urban, not rural or resource lands uses. Given the affordable housing targets applied to the Clark County urban growth areas, the Land Use Element and Future Land Use Map must designate adequate land for affordable housing within the urban growth areas.

The Land Use Element and Future Land Use Map should focus these densities and housing units in transit-oriented development locations within the UGAs.

These housing densities when located with mixed uses along transportation corridors and designed consistent with Transit Oriented Development principles is also an important method of reducing greenhouse gas pollution.[14] So the County can provide for affordable housing and reduce greenhouse gas pollution. This will also help comply with the requirements to reduce per capita vehicle miles traveled (VMT) in RCW 36.70A.070(1) and RCW 36.70A.070(9)(c) and (d)(i)(B) and to reduce greenhouse gas pollution in RCW 36.70A.070(9)(c) and (d)(i)(A). Indeed, the most effective way to reduce per capita VMT is to focus growth into existing cities and towns because they allow shorter automobile trips and encourage walking, bicycling, and transit use thereby reducing per capita VMT.[15]

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[12] Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026) last accessed on June 17, 2026, at: https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/ and at the link on the last page of this letter with the filename: "HB 1220_Book2_Housing Element Update_230823 Final_updated 260112.pdf."

[13] *Id.*

[14] Wash. State Dep't of Commerce Growth Management Services, Clark County 2022 Greenhouse Gas Emissions Analysis p. 26, pp. C-1 – C-2 (v3.5.1) last accessed on June 17, 2026, at: https://www.commerce.wa.gov/growth-management/climate-planning/climate-policy-tools/ enclosed at the link on the last page of this letter and in a separate email with the filename: "CountyGHGAnalysisReport_Clark_20260123.pdf."

[15] Arthur C. Nelson, *Compact Development Reduces VMT: Evidence and Application for Planners—Comment on "Does Compact Development Make People Drive Less?"*, 83 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 36 pp. 36 – 38 (2017), DOI: 10.1080/01944363.2016.1246378 enclosed at the link on the last page of this letter with the filename: "Compact Development Reduces VMT Evidence and Application for Planners Comment on Does Compact Development Make People Drive Less.pdf." The Journal of the American Planning Association is peer-reviewed. Journal of the American Planning Association Instructions for authors webpage enclosed at the link on the last page of this letter with the filename: "JAPA Instructions for Authors June 2017.pdf."

The Land Use Element, the Future Land Use Map, and the Rural Element should better protect working farms.

The Growth Management Act requires Clark County "*to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products.*[16] Clark County's BERK report documents that the 20-acre minimum lot size and non-agricultural uses allowed by the Agriculture (AG-20) comprehensive plan designation and zone fails to conserve agricultural land of long-term commercial significance because they allow "non-productive rural uses."[17] "Given onsite development or other non-productive rural uses (e.g. dwellings, manicured lawns associated with dwellings, etc.) there is a greater area zoned AG and a lesser area inventoried by [the Washington State Department of Agriculture] WSDA in agricultural use. WSDA inventoried acres make up between 15-27% of the AG 10 zone area [which was zoned AG-20 when the BERK report was written]."[18] The BERK report also found based on the Census of Agriculture that "1.5% of the [Clark County] farms are large, representing 72% of the total commodity outputs. ... The loss of large farms corresponds to a loss in commodity totals. In 2007 dollars, the value of agriculture dropped from $62.3 million in 1997 to $52.7 million in 2007, and again to $45.9 million in 2012."[19] Converting large farms to small farms and 20-acre estates with manicured lawns as the AG-20 zone allows will not conserve agricultural lands and encourage the agricultural economy as the GMA requires. Clark County should increase the minimum lot size to 40 acres and remove the nonagricultural uses from the comprehensive plan designation and zone.[20]

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[16] *King County v. Central Puget Sound Growth Management Hearings Bd. (Soccer Fields)*, 142 Wn.2d 543, 556, 14 P.3d 133, 140 (2000) emphasis in original.
[17] BERK Consulting, *Clark County Comprehensive Plan 2016 Update Planning for Growth 2015 – 2035: Clark County Agriculture and Forest Land Supplemental Mapping and Data Analysis – Issue Paper 9* p. 18 (June 23, 2016) last accessed on June 17, 2026, at https://www.clark.wa.gov/sites/default/files/dept/files/community-planning/2016-update/Plan%20Adoption/Final%20documents-maps/Issue%20Paper_9_Supplemental%20Resource%20Land%20Info_2016_0623_CLEAN.pdf enclosed at the link on the last page of this letter and in a separate email with the filename: "Issue Paper_9_Supplemental Resource Land Info_2016_0623_CLEAN.pdf."
[18] *Id.* at p. 18.
[19] *Id.* at p. 6.
[20] Arthur Nelson, *Preserving Prime Farmland in the Face of Urbanization: Lessons from Oregon* 58 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 467, 471 – 74 (1992) enclosed at the link on the last page of this letter and in a separate email with the filename: "Preserving Prime Farmland in the Face of Urbanization Lessons from Oregon JAPA.pdf." The Journal of the American Planning

Comments on Chapter 2 Housing Element

The comprehensive plan housing element and the development regulation updates must identify sufficient land for housing affordable to the zero to 30, 30 to 50, 50 to 80, 80 to 100, and 100 to 120 percent of the Area Median Income (AMI) income bands or categories for unincorporated Clark County.

The Growth Management Act in RCW 36.70A.070(2)(c) requires the county comprehensive plan housing element, and the county development regulations,[21] to "[i]dentif[y] sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes[.]" RCW 36.70A.070(2)(d) requires the county comprehensive plan housing element, and the county development regulations,[22] to: "(d) Make[] adequate provisions for existing and projected needs of all economic segments of the community, including: (i) Incorporating consideration for low, very low, extremely low, and moderate-income households[.]" The Growth Management Hearings Board addressed what adequate provisions mean for a county comprehensive plan that did not have sufficient capacity for affordable housing:

> While the GMA does not specifically define what it means to make adequate provisions, Merriam-Webster defines "adequate" as "sufficient for a specific need or requirement." To Commerce, this means jurisdictions "must use the tools at their disposal to create the conditions that make it feasible for developers to build the kinds of housing needed at all income levels." Here, that need is 1,345 housing units to specifically provide for this community's most vulnerable members who have been left out of the equation. Thus, it appears to this Board that the Legislature has made it clear, a local jurisdiction can no longer align population allocations "over time." Instead, local jurisdictions must account for their allocated population either within

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[21] RCW 36.70A.130(1)(a), (e).
[22] RCW 36.70A.130(1)(a), (e).

> their Comprehensive Plan or demonstrate how the local jurisdiction's development regulations will make adequate provisions for the existing and projected needs of all economic segments of the community.[74] A deficit is no longer permitted to languish unresolved.
> [74] RCW 36.70A.070(2)(d).[23]

Consequently, the Kitsap County comprehensive plan violated the Growth Management Act because it had capacity deficits of 1,179 housing units for the zero to 80 percent of the Area Median Income (AMI) brackets and a 166-unit shortfall in the moderate density zones for the 80 to 120 percent AMI brackets.[24]

Unfortunately, the draft housing element does not document that the county has sufficient land for housing affordable to the zero to 30, 30 to 50, 50 to 80, 80 to 100, and 100 to 120 percent of the Area Median Income (AMI) income bands allocated to the unincorporated County by the Housing For All Planning Tool in Appendix J. It maybe that this information is available elsewhere in the comprehensive plan, but RCW 36.70A.070(2)(c) requires the county comprehensive plan housing element to "[i]dentif[y] sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes[.]" The housing element must identify that sufficient capacity is available by income group.

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[23] *Kitsap Alliance of Property Owners; William M. Palmer; Futurewise; Terry Y. Yamamoto; and Yamamoto Hydroseeding, v. Kitsap County*, Growth Management Hearings Board Central Puget Sound Region (GMHBCPSR) Case No. 25-3-0005c, Final Decision and Order (Aug. 8, 2025), at 12 – 13 of 24 fn. 73 omitted last accessed on Feb. 9, 2025, at: https://eluho2022.my.site.com/casemanager/s/eluho-document/a0Teq000000eEsNEAU/20250808-final-decision-and-order and at the link on the last page of this letter with the filename: "2025-08-08 Final Decision and Order.pdf."
[24] *Id.*, at 10 – 13 of 24.

Comments on Appendix I Climate Element Resource Documents; Resource Document 1: List of Climate Goals and Policies Across All Chapters

The comprehensive plan and development regulations should incorporate the strategies identified in the *Clark County 2022 Greenhouse Gas Emissions Analysis* to reduce greenhouse gas pollution not included in the comprehensive plan and development regulations. Please see Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 1 – 52.

RCW 36.70A.070(9)(d)(i) requires

> (d)(i) The greenhouse gas emissions reduction subelement of the comprehensive plan, and its related development regulations, must identify the actions the jurisdiction will take during the planning cycle consistent with the guidelines published by the department pursuant to RCW 70A.45.120 that will:
> (A) Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state;
> (B) Result in reductions in per capita vehicle miles traveled within the jurisdiction but without increasing greenhouse gas emissions elsewhere in the state; and
> (C) Prioritize reductions that benefit overburdened communities in order to maximize the cobenefits of reduced air pollution and environmental justice.

To "identify" is to "link in an inseparable fashion : make correlative with something ...."[25] An "action" is "the bringing about of an alteration by force or through some natural agency ...."[26] So the subelement must include goals and policies bringing about of an alteration linked or correlated to "[r]esult in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction ..."[27] The subelement must "[p]rioritize reductions that benefit overburdened communities ...."[28] As the Washington State Department of Commerce (Commerce) writes "meeting your obligation to reduce [greenhouse

[25] WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY p. 1123 (2002).
[26] WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY p. 21 (2002).
[27] RCW 36.70A.070(9)(d)(i)(A).
[28] RCW 36.70A.070(9)(d)(i)(C).

gas] GHG emissions will require implementation of tangible actions. A set of policies limited to 'study' or 'consideration' will not reduce GHG emissions."[29]

To assist counties and cities with this requirement, Commerce has prepared a greenhouse gas emissions analysis which projects greenhouse gas emissions and then includes scenarios identifying local strategies to reduce greenhouse gas emissions.[30] The scenario that most closely matches the *Clark County* greenhouse gas reduction requirements is the "local action" scenario.[31] To achieve the County's greenhouse gas reduction goals, we recommend that the comprehensive plan include policies and adopt regulations that match the "Local Action Scenario And GHG Emission Reductions ($MTCO_{2E}$) - All Emissions."[32]

Some of these Local Strategies are not adequately incorporated into Resource Document 1: List of Climate Goals and Policies Across All Chapters and the comprehensive plan and development regulations. The first strategy from the Local Action Scenario is to electrify 100 percent of the new buildings by 2050.[33] The comprehensive plan does not provide for electrifying 100 percent of new buildings.[34] We have not been able to find an analysis showing the proposed policies will result in the electrification of 100 percent of the new buildings. The closest it comes is proposed Policy 14.17.4: "Incentivize new construction to be 'future-ready' through incorporation of design elements that support building owners and renters to easily adapt to changing energy needs, preferences, and conditions over time ...."[35] Some other policies call for promoting and supporting energy efficiency and providing education, but incentivizing, promoting, and supporting will not achieve the electrification of all new buildings.[36] These policies will not carryout the strategy of electrifying 100 percent of the new buildings by

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[29] Wash. State Dep't of Commerce, *Climate Element Planning Guidance* p. 64 (Dec. 2023 — Intermediate Version V3.1).
[30] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* pp. 25 – 26 (v3.5.1) last accessed on July 29, 2026, at: https://deptofcommerce.app.box.com/s/7ldu8wigqhvfikj4omrovl4szfpt7d8s and at the link on the last page of this letter and in a separate email with the filename: "CountyGHGAnalysisReport_Clark_20260618.pdf."
[31] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[32] *Id.* p. 26.
[33] *Id.* p. 26.
[34] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 1 – 52.
[35] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 48.
[36] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 46 – 48.

2050. In describing applicable goals and policies, Commerce recommends the following goals and policies among others:

> Goal: Maximize solar access of site design, where practicable, for new solar-ready residential and commercial buildings. [Goal ID# G]
> • Direct solar development onto lands identified as having "least conflict" through the Least-Conflict Solar Siting process on the Columbia Plateau. [Policy ID# G.02]
> • Require solar panels on buildings with large rooftops, as well as within or over parking areas. [Policy ID#G.03]
> Goal: Prioritize the adaptive reuse of buildings, recognizing the emission-reduction benefits of retaining existing buildings. [Priority Goal ID# F]
> • Prioritize the preservation and weatherization of housing in overburdened communities, particularly at higher densities, to reduce emissions and increase resilience. [Priority Policy ID# F.02]
> Goal: Ensure that buildings use renewable energy, conservation, and efficiency technologies and practices to reduce greenhouse gas emissions. [Priority Goal ID# E]
> • Require zero greenhouse gas emissions features for all new residential and commercial structures.
> [Priority Policy ID# E.01]
> • Maximize renewable energy sources for the supply of electricity and heat to new and existing buildings.
> [Policy ID# E.02]
> • Retrofit buildings for energy efficiency. [Priority Policy ID# E.03]
> • Develop local microgrid solar and battery storage facilities in low-impact sites. [Policy ID# E.04]
>
> ...
> • Establish agreements to procure low-carbon-intensity power supply. [Priority Policy ID# E.11]
> • Encourage use of Combined Heat and Power (CHP) Systems in new and existing developments. [Priority Policy ID# E.12]
> • Require energy labeling for new residential buildings. [Policy ID# E.13][37]

[37] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* pp. C-4 – C-5 (v3.5.1).

We recommend adopting these directive goals and policies in addition to the other policies.

The second strategy is to reduce energy use in existing buildings by 45 percent by 2050.[38] Again, no goal or policy incorporates this strategy.[39] We have not been able to find an analysis showing the proposed policies will result in reducing energy use in existing buildings by 45 percent by 2050. Proposed Policy 14.16.3 does provide "[c]ollaborate with local utilities and community based organizations to support programs that provide weatherization, energy efficiency upgrades, and heat capture for commercial and residential buildings."[40] Commerce provides that "[y]ou should use strong and directive verbs in your policies, where possible, and amend development regulations such as zoning or building standards to ensure that your measures achieve reduction in GHG emissions and per-capita VMT …"[41] Commerce also provides that "[p]lans should contemplate how to create fully weatherized, electrified homes built to manage energy demand and resilient to climate impacts in extreme heat or cold."[42] This provision fails both standards. It is not specific, collaborate and support, is not specified and the policy does not include how weatherization and upgrades will be provided.

The third strategy is to electrify existing buildings with 95 percent of buildings using fossil fuels converted to electricity by 2050.[43] No goal or policy incorporates this strategy.[44] We have not been able to find an analysis showing the proposed policies will result in 95 percent of buildings using fossil fuels converted to electricity by 2050.

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[38] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[39] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 1 – 52.
[40] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 46.
[41] Wash. State Dep't of Commerce Growth Management Services, *Climate Element Planning Guidance* p. 59 (Dec. 2025 V.3) last accessed on July 29, 2026, at: https://www.commerce.wa.gov/growth-management/climate-planning/climate-planning-guidance/ and enclosed at the link on the last page of this letter and in a separate email with the filename: "2025 Climate Planning Guidance.pdf."
[42] Wash. State Dep't of Commerce Growth Management Services, *Climate Element Planning Guidance* p. 91 (Dec. 2025 V.3).
[43] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[44] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 1 – 52.

The fourth strategy is to reduce industrial emissions by 50 percent by 2050.[45] The comprehensive plan does not provide for reducing industrial emissions by 50 percent.[46] We have not been able to find an analysis showing the proposed policies will reduce industrial emissions by 50 percent. While the Climate Commitment Act will reduce greenhouse gas pollution from industrial uses and has been incorporated into the modeling, it and other state and federal programs will not achieve the needed reductions.[47]

The fifth strategy is to reduce passenger vehicle miles traveled (VMT) by 20 percent by 2050.[48] While the comprehensive plan includes policies related to VMT reduction, the comprehensive plan does not provide for reducing VMT by 20 percent.[49] We have not been able to find an analysis showing the proposed policies will reduce VMT by 20 percent.

Some policies are so contingent as to be ineffective. For example, Policy 5.7.1 provides: "Reduce or remove parking requirements where appropriate to support more dense, mixed land use. To implement this policy, the county must: a) Conduct a parking and/or parking requirement analysis to inform next steps; b) Consider the positive and negative impacts of possible options through an environmental justice and climate lens; and c) Develop an approach in collaboration with the community and consistent with all applicable laws."[50] This policy has no assurance that parking requirements will be reduced or eliminated even where appropriate. In contrast, Commerce recommends "[r]educe parking requirements where there are multimodal options available. [Priority Policy ID# AC.02]"[51] This is a policy that contains a commitment to act and reduce VMT where there are multimodal options. We recommend that the County adopt this policy in the place of proposed Policy 5.7.1.

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[45] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[46] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 1 – 52.
[47] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. B-4, 25 (v3.5.1).
[48] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[49] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 24 – 26.
[50] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 25.
[51] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. c-3 (v3.5.1).

Reducing or eliminating parking also makes housing more affordable.[52] A study using American Housing Survey data found that "[m]inimum parking requirements in municipal zoning codes drive up the price of housing ...."[53]

We also urge the other Commerce recommendations such as "[p]rioritize permitting for transit-oriented development (TOD) proposals. [Priority Policy ID# I.24][54]

More areas within the existing urban growth areas should be planned and zoned for more mixed use transit-oriented development. We recognize that 1.3.2 provides "[d]evise specific policies and standards to promote higher density urban, commercial and mixed-use development and to support pedestrian and transit travel within high-density residential and commercial areas" which is transit-oriented development. But the deadline for policies, standards, and regulations was December 1, 2025, not some undefined future date.[55] These provisions should be part of this comprehensive plan and development regulations update.

In addition, rural and natural resource growth targets should be reduced to also reduce VMT. Indeed, the most effective way to reduce per capita VMT is to focus growth into existing cities and towns because they allow shorter automobile trips

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[52] National Academies of Sciences, Engineering, and Medicine, *Effects of TOD on Housing, Parking, and Travel* p. 6 (Washington, DC: The National Academies Press: 2008) last accessed on July 30, 2026, at https://doi.org/10.17226/14179 and in at the link on the last page of this letter with the filename: "14179.pdf."

[53] C. J. Gabbe & Gregory Pierce, *Hidden Costs and Deadweight Losses: Bundled Parking and Residential Rents in the Metropolitan United States* 27 HOUSING POLICY DEBATE 217, 217 (2017) (page 2 in the enclosed version) last accessed on July 30, 2026, at: https://scholarcommons.scu.edu/cgi/viewcontent.cgi?article=1040&context=ess and at the link on the last page of this letter with the filename: "Hidden costs and deadweight losses_ Bundled parking andresidentia.pdf." Housing Policy Debate is peer reviewed. Housing Policy Debate Aims and scope webpage last accessed on Aug. 15, 2024, at: https://www.tandfonline.com/action/journalInformation?show=aimsScope&journalCode=rhpd20 and at the link on the last page of this letter with the filename: "Housing Policy Debate About this Journal webpage.pdf."

[54] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. c-3 (v3.5.1).

[55] RCW 36.70A.130(1), (5)(b).

and encourage walking, bicycling, and transit use thereby reducing per capita VMT.[56]

We do support the Comprehensive Plan's transit policies.

Strategy six is to electrify 100 percent of the passenger vehicles sold in 2050.[57] While the county does include policies to address this strategy, they do not call for electrifying 100 percent of the passenger vehicles sold in 2050.[58] Nor where we able to find an analysis showing that the proposed goals and policies would achieve this strategy. As part of this strategy, Commerce recommends requiring "electric vehicle charging infrastructure in all new and retrofitted buildings."[59] We recommend adopting a policy to carry this out. The proposed policy can read:

X.X.X. Require electric vehicle charging infrastructure in all new and retrofitted buildings. For commercial and industrial buildings and facilities with fleets or where shipments or transshipments will occur, the electric charging infrastructure shall be sized for freight and service vehicles.

Thurston County just adopted regulations requiring electric vehicle charging infrastructure in most new buildings.[60]

Strategy seven calls for electrifying 80 percent of the freight and service vehicles sold in 2050.[61] While proposed Policy 5.8.4 calls for collaborating with state, regional, and local agency on the electrification of non-personal vehicles such as transit (bus, train, ferry) and freight (truck and rail)," it does not call for

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[56] Arthur C. Nelson, *Compact Development Reduces VMT: Evidence and Application for Planners—Comment on "Does Compact Development Make People Drive Less?"*, 83 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 36 pp. 36 – 38 (2017), DOI: 10.1080/01944363.2016.1246378 enclosed at the link on the last page of this letter and a separate email with the filename: "Compact Development Reduces VMT Evidence and Application for Planners Comment on Does Compact Development Make People Drive Less.pdf." The Journal of the American Planning Association is peer-reviewed. Journal of the American Planning Association Instructions for authors webpage enclosed at the link on the last page of this letter with the filename: "JAPA Instructions for Authors June 2017.pdf."
[57] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[58] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 26, p. 48.
[59] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. C-3 (v3.5.1).
[60] Thurston County Ord. No. 16575 Attachment A.
[61] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 27 (v3.5.1).

electrifying 80 percent of the freight and service vehicles sold in 2050.[62] Nor does this policy indicate how this strategy could possibly be achieved. Policies to achieve this strategy are needed to meet the greenhouse gas pollution reduction requirements. As part of this strategy, Commerce recommends requiring "electric vehicle charging infrastructure in all new and retrofitted buildings."[63] The proposed policy above incorporates this recommendation.

Strategy eight calls for electrifying 90 percent of the transit vehicles sold in 2050.[64] While proposed Policy 5.8.4 calls for collaborating with state, regional, and local agency on the electrification of non-personal vehicles such as transit (bus, train, ferry)," it does not call for electrifying 90 percent of the transit vehicles sold in 2050.[65] Policies implementing this strategy should be adopted.

Strategy nine calls for reducing offroad equipment carbon emissions by 95 percent in 2050.[66] Proposed Policy 14.6.1 does call for "[f]acilitating collaboration with community partners to provide support for low- or zero-greenhouse gas emitting farming and landscaping equipment rental, repair, and access, including equipment shares" which we support.[67] Commerce recommends "[p]has[ing] out the use of municipal gas-powered landscaping equipment and replace with electric or otherwise sustainable alternatives. [Policy ID# Z.05]"[68] We suggest adopting this policy and also phasing out gas-powered landscaping equipment as some cities and counties have done for gas powered leaf blowers.[69] Our recommendation is shown below:

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[62] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 26.
[63] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. C-3 (v3.5.1).
[64] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[65] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 26.
[66] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[67] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 38.
[68] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. C-6 (v3.5.1).
[69] See City of Portland, OR webpage About the Equitable Gas Leaf Blower Phase-out last accessed on July 29, 2026, at: https://www.portland.gov/bps/climate-action/leaf-blowers/glb-phase-out and at the link on the last page of this letter and in a separate email with the filename: "About the Equitable Gas Leaf Blower Phase-out _ Portland.gov.pdf."

X.X.X Phase out the use of gas-powered landscaping equipment and replace with electric or otherwise sustainable alternatives over the next ten years.

Strategy ten calls for diverting 85 percent of the construction and demolition (C & D) waste from landfills by 2050.[70] While we recognize that waste reduction policies are proposed, they do not call for an 85 percent reduction.[71] To implement this strategy, Commerce recommends a policy of "[d]evelop a program that will enable recycling of all construction and demolition debris by [insert target].[72] We recommend a similar policy be adopted.

Strategy eleven calls for diverting 95 percent of recyclable and compostable materials from landfills by 2050, although no greenhouse gas reductions are identified for this strategy.[73] While we recognize that waste reduction policies are proposed, they do not call for a 95 percent reduction.[74] One is needed and our recommendation follows.

X.X.X Adopt regulations and implement programs to divert 95 percent of recyclable and compostable materials from landfills by 2050.

Strategy twelve calls for improving soil management to reduce 75 percent of emissions by 2050.[75] We recognize that several policies call for improving soil health and carbon sequestration, which we support.[76]

Policies addressing reducing greenhouse gas emissions from the conversion of agricultural land are also needed. Commerce recommends "[p]reserve land outside of the unincorporated UGA for long-term agricultural use, recreation, open spaces,

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[70] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[71] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 21, p. 38. pp. 49 – 50.
[72] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* C-5 (v3.5.1).
[73] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 27 (v3.5.1).
[74] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 21, p. 38. pp. 49 – 50.
[75] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. 26 (v3.5.1).
[76] Resource Document 1: List of Climate Goals and Policies Across All Chapters p. 39. p. 43.

forestry, mineral resources, and other uses consistent with rural character."[77] Commerce also recommends "[s]upport funding to protect agricultural land from conversion to other uses, and assist farmers in transferring and accessing land."[78] We recommend adopting both policies as shown below:

X.X.X Preserve land outside of the unincorporated UGA for long-term agricultural use, recreation, open spaces, forestry, mineral resources, and other uses consistent with rural character.

X.X.X Support funding to protect agricultural land from conversion to other uses, and assist farmers in transferring and accessing land.

Strategy thirteen calls for reducing tree loss by 90 percent by 2050.[79] We appreciate and support the policies addressing trees and tree canopies.[80] However, we are concerned that proposed Policy 14.9.2 which calls for "[d]evelop[ing] and adopt[ing] a tree plan and implementing ordinance to maximize planting and protection of trees ..." does not have a deadline for undertaking these actions.[81] As was noted above, the deadline for plans and regulations was December 1, 2025, not some undefined future date.[82] We recommend that proposed Policy 14.9.2 include as a deadline the deadline for the first implementation progress report required by RCW 36.70A.130(9)(a).

Some of the resiliency subelement provisions do not comply with RCW 36.70A.070(9)(e)(i).

RCW 36.70A.070(9)(e)(i) provides in relevant part that:

> The resiliency subelement must prioritize actions that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change. Specific goals, policies, and programs of the resiliency subelement must include, but are not limited to, those designed to:

[77] Wash. State Dep't of Commerce Growth Management Services, *Clark County 2022 Greenhouse Gas Emissions Analysis* p. C-7 (v3.5.1).
[78] *Id.* p. C-7.
[79] *Id.* p. 26.
[80] Resource Document 1: List of Climate Goals and Policies Across All Chapters pp. 41 – 44.
[81] *Id.* p. 42.
[82] RCW 36.70A.130(1), (5)(b).

> (A) Identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration;
> (B) Identify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice; and
> (C) Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.

Complying with these requirements will require new and amended regulations especially to protect and enhance natural areas, to protect and enhance community resiliency, and to address the natural hazards.[83]

Goal 1.5 Policies 1.5.1 and 1.5.2 on page 3 violate RCW 36.70A.070(9)(e)(i).

Some of the proposed goals and policies are not consistent with RCW 36.70A.070(9)(e)(i). Proposed Goal 1.5 and Policies 1.5.1 and 1.5.2 encourage, seek to reduce, and periodically review climate hazards. RCW 36.70A.070(9)(e)(i)(C) requires "[s]pecific goals, policies, and programs" that "must" "[a]ddress natural hazards ...." To "address" means "to make right ...."[84] But this goal and these policies do not make anything right. Instead they encourage and in some cases postpone action to some undefined future date. While future evaluation makes sense given the uncertainties of climate change, we know now many ways that climate change has and will continue to adversely affect the people and properties in Clark County. We recommend that this goal and the policies be revised to address climate hazards now.

This update needs to include development regulations to implement the new climate goals and policies.

We are concerned that this update does not include development regulations to implement the new climate element. As part of the 2025 comprehensive plan

[83] RCW 36.70A.130(1)(a).
[84] WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY 24 (2002). When the legislature has not defined a term in a statute, the courts "apply its common meaning, which may be determined by referring to a dictionary." *Quadrant Corp. v. State Growth Mgmt. Hearings Bd.*, 154 Wn.2d 224, 239, 110 P.3d 1132, 1140 (2005). The supreme court consulted Webster's Third New International Dictionary. *Id.*

update, Clark County is required to adopt a greenhouse gas emissions reduction subelement and related development regulations.[85]

As part of the 2025 comprehensive plan update, Clark County is required to adopt a resiliency subelement.[86] Complying with this requirement will require new and amended regulations especially to protect and enhance natural areas, to protect and enhance community resiliency, and to address the natural hazards.[87]

Comments on Appendix K-Density Targets

Many of the densities in Appendix K-Density Targets are too low to provide housing affordable to families earning 80 percent or less of the Area Median Income (AMI).

The Washington State Department of Commerce has documented that to provide housing affordable to families and individuals earning 80 percent or less of the area median income requires low-rise multifamily and mid-rise multifamily housing and potentially accessory dwelling units.[88] These housing types typically have densities of 18 to 70 housing units per acre.[89] Affordable housing will be very difficult at the low end of this range. Each jurisdiction needs to provide densities that can produce housing affordable to all income groups. Each jurisdiction should have an upper density range of at least 50 housing units per acre to permit affordable housing in all cities and towns.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email: tim@futurewise.org.

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[85] RCW 36.70A.095.
[86] RCW 36.70A.070(9)(c).
[87] RCW 36.70A.130(1); RCW 36.70A.120.
[88] Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 36 (Aug. 2023, updated Jan. 2026) last accessed on July 29, 2026, at: https://www.commerce.wa.gov/growth-management/housing-planning/housing-guidance/ and at the link on the last page of this letter and in a separate email with the filename: "HB 1220_Book2_Housing Element Update_230823 Final_updated 260112.pdf."
[89] JHP, *Density Guide* pp. *4 – 5 last accessed on July 8, 2026, at: https://jhparch.com/density and at the link on the last page of this letter and in a separate email with the filename: "JHP-Density Guide.pdf."

Very Truly Yours,



Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

Enclosures at this link and for some in separate emails:

Clark Comp Plan