From:	Jeffrey Delapena
To:	"Snodgrass, Bryan"
Cc:	Oliver Orjiako; Jose Alvarez
Subject:	RE: City of Vancouver comment letter on the Comprehensive Plan update to the County Council and Planning Commission for August 20 Public Hearing
Date:	Wednesday, August 19, 2026 11:12:00 AM
Attachments:	image001.png image002.png image003.png image004.png

Good day, Bryan,

Thank you for submitting the City of Vancouver's comments ahead of the Aug. 20th Public Hearing for the 2025 Comprehensive Plan Update.

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: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Wednesday, August 19, 2026 9:59 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: City of Vancouver comment letter on the Comprehensive Plan update to the County Council and Planning Commission for August 20 Public Hearing

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Good Morning Jeffrey
Can you please forward the attached comment letter from the City of Vancouver to the Planning Commission and City Council in advance of the August 20 public hearing? Thank you very much.

August 18, 2026

RE: Clark County Comprehensive Plan

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

Thank you for the opportunity to comment as the Comprehensive Plan update begins its final adoption hearings, and for your work and that of the County staff over the past four years. We sincerely appreciate these efforts.

The work has resulted in a proposed Comprehensive Plan which provides for ample growth opportunities. The Plan is anchored by a higher countywide population growth forecast than projected by the state, and an employment forecast to match it. To ensure there is adequate land to accommodate these forecasts, a VBLM model has been developed after extensive review, particularly in the case of residential land capacity estimates.[i] Significant home ownership as well as rental housing opportunities are provided, as the Plan zones more than three times as much land for low density residential housing than it does for high density housing and mixed use combined. [ii]

Sound long term planning as you know requires more than just providing an adequate total amount of land for growth. Please consider two areas where further work is needed in our view to bring this update to a successful conclusion:

1. **In the existing Vancouver Urban Growth Area (VUGA), provide some zoning to facilitate commercial or employment opportunities in areas that completely lack them, contrary to County and state policy direction**. Large portions of the unincorporated VUGA contain nothing but housing, forcing local residents to drive a mile or more to the nearest shopping or employment. This is inconsistent with GMA climate requirements to reduce Vehicle Miles Travelled (VMT) in local plans, and longstanding Clark County Comprehensive Plan Policy 1.4.1 to locate interrelated uses near each other. Although City staff identified 17 possible sites to begin to address this deficiency in 2024, no zoning to meaningfully incentivize or require commercial or employment uses has been added in the parts of the VUGA that need them. In most cases proposed zoning does not even allow these uses. Small, incremental steps can help. If limited, select zoning cannot be added in this update, we urge the County to work with the City to do so following adoption.

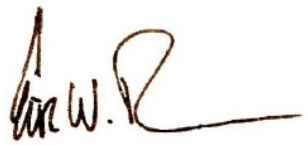
2. **Resolve the countywide urban land surplus and other legal issues in this update which have regional implications.** The County FEIS reports on page 116 that the Preferred Alternative has capacity for over 10,000 excess housing units beyond the County's adopted growth forecast. The County's Agricultural Lands Study appears to find that local agriculture is commercially viable and GMA criteria for de-designation is on balance not been met. Yet there is no information in the FEIS or adoption hearing materials to date about what actions might be taken to bring the Preferred Alternative into compliance with the GMA, or acknowledging that these significant legal hurdles remain. This raises questions such as the following:

   - Will the growth forecasts or VBLM assumptions be changed at the last minute? We are weary of this possibility, as a small numbers change earlier in this update process created a temporary need for ill-advised Vancouver UGA expansions which the County had to later scale back.
   - If small City UGA expansions requiring agricultural land de-designations are adopted but then removed by the Hearings Board as they have been in the past, will that growth have to be made up elsewhere through expansions to the Vancouver UGA?
   - If the County takes an unusual position regarding the growth numbers or the agricultural criteria, what are the regional implications for the future?
   - What are the implications for infrastructure adequacy in the unincorporated Vancouver UGA if the County again becomes ineligible for state grant monies because of GMA legal violations, as it has in the past?

   The City of Vancouver has supported growth aspirations of all cities in principle, but an assessment and discussion is needed about the legal and practical implications of the Preferred Alternative for the region. We urge that this occur at the start of the adoption hearings, beginning with the Planning Commission, so all interested parties can provide input accordingly.

Thank you again for your consideration.

Sincerely,



Erik Paulsen, Vancouver City Councilmember

[i] Employment capacity is likely significantly underestimated by the VBLM reports, as employment, unlike residential, was not extensively reviewed by the original Buildable Lands Project Advisory Committee in 2020 and various outdated assumptions are still being used. Jobs per acre assumptions have not been updated in 20 years.

Home based work is still assumed to account for 4% of future countywide jobs, when the actual countywide number reported in the recent County DEIS is 18.7%. Little to no redevelopment or filling in existing businesses is assumed over the next 20 years. Effectively no future vertical mixed-use buildings are assumed in the VUGA mixed use zone.

[ii] County FEIS page 115 https://clark.wa.gov/sites/default/files/media/document/2026-08/volume-1-feis_for2025clarkcountycompplan_compressed_issued2026-0724.pdf. . New state laws allowing for unit lot subdivisions and lot splitting options will further facilitate ownership opportunities, along with popular existing options like cottage clusters.