From:	Jeffrey Delapena
To:	"Snodgrass, Bryan"; Sue Marshall; Oliver Orjiako; Rebecca Messinger; Jose Alvarez
Subject:	RE: City of Vancouver comments for October 1 County Council Comprehensive Plan hearing
Date:	Wednesday, September 30, 2026 2:53:00 PM
Attachments:	image001.png image002.png image003.png image004.png

Good day, Bryan,

Thank you for submitting the City of Vancouver's comments related to the 2025 Comprehensive Plan update ahead of the Oct. 1st Council Hearing

These will be added to the Comprehensive Plan Index of Record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Wednesday, September 30, 2026 2:45 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: City of Vancouver comments for October 1 County Council Comprehensive Plan hearing

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Dear Councilors and Staff – Attached please find City of Vancouver comments for the October 1 public hearing. Thank you.

September 29, 2026

RE: Clark County Comprehensive Plan

Honorable Chair Marshall and County Councilors Yung, Belkot, Fuentes and Little

Thank you for the opportunity to comment, and for your work and that of your staff throughout this update. A lot has been completed. County materials posted for the final hearings confirm there is more than enough land for growth of all types, with ample ownership as well as rental opportunities. The latest numbers indicate there is buildable land capacity for 10,000 more housing units and 1800 jobs countywide than are needed to accommodate the County's adopted growth forecasts. More than 80% of the residential surplus is for housing to accommodate near market, market and above market income households, not affordable housing. Most of the buildable residential land in the County is zoned for lower, not higher densities. [1]

Some important unfinished work remains in our view to reach a successful conclusion consistent with the Growth Management Act (GMA). We respectfully recommend the Council undertake the following:

1. **Provide some zoning for shopping and employment in portions of the Vancouver Urban Growth Area (VUGA) that completely lack them.** Long term planning needs to consider the location of growth, not just the total amount. It's been noted for some time in this process that large swaths of unincorporated VUGA have no remotely close shopping or employment opportunities or supportive zoning to facilitate them, forcing area residents to drive over a mile in many cases to the nearest shopping or employment. It's also been noted with little pushback that the current situation does not appear consistent with longstanding County policy 1.4.1 which calls for interrelated uses to be located near each other, or with new GMA climate requirements under RCW 36.70A.070(9)(d)(i)(B) to reduce Vehicle Miles Travelled (VMT) in local plans. In 2024 the City of Vancouver provided a list of 17 potential VUGA sites to consider adding some commercial and/or employment zoning. The City

[1] See County Ex4, Memo on Capacity, Tables 3, 4, and 5. Table 5 indicates that only 49 of 278 total housing unit of surplus capacity are for 80% or lower AMI. See also Appendix N, Land Capacity Analysis

narrowed this down in 2025 to four large potential VUGA sites where owners had submitted site specific residential upzone requests, in hopes that portions of those sites could include a commercial component.

Yet nothing has happened. Supportive commercial or employment zoning was not added in the maps studied through the County's Environmental Impact Statement (EIS) review process. None of the City proposals were even listed on the County Planning Commission and Council decision tables, so none were discussed. The Commission was told at their last deliberations on September 3 that none of the City proposals coincided with sites that were on the County decision list, when in fact two are.

Specific Action Requested:

- *Include this overall issue as an item in the County decision table for the VUGA, and discuss during Council review of decision table items 18 and 23. Number 18 is a residential upzone on 44 acres from R1-5 to R-36, where we suggest including a commercial component on NE 119th Street. Number 23 is a conversion on 40 acres from MX to R-24, where we suggest including a commercial component on NW 164th Street, or at least keeping it as MX.*
- *Take some form of action, either designating some supportive zoning now, or directing that the issue be examined in 2027 workplans after Comprehensive Plan adoption.*

2. **Do not significantly roll back proposed minimum multi-family densities in the VUGA before the new Comprehensive Plan has had a chance to work, particularly when based on incomplete information**. Long term planning should involve not just allowing growth, but to a degree trying to shape it. A September 3 DEAB letter raises valid and important points about the need to consider market feasibility, but in response proposes reducing new VUGA minimum density requirements in *all* multi-family residential and mixed use zones by *thirty to forty percent* from what the FEIS envisioned. Rollbacks of this scope and magnitude would likely undercut the legality and affordability of the County Comprehensive Plan, and may not fully represent recent development, let alone future development anticipated during the planning period. As noted by County staff at the September 16 workshop, the multi-family zoning subject to the minimum density requirements in question constitute a minority of the overall residential land supply but is necessary to provide the less costly housing that many local residents need, and that the GMA requires.

   These recommended density reductions, in some zones to as low as 12 units per acre, are based on a table focusing on garden apartment developments averaging around 25 units per acre, twice as high. These reported averages would be even higher if the sample included more non-garden apartment projects such as the Artifact and Kirkland proposals in

central and eastern Vancouver that are located far from downtown and are planned for densities of over 80 units per acre.[2]

Beyond concerns about the completeness of the underlying data, as a matter of process we recommend against making major areawide changes to the proposed new Comprehensive Plan and zoning code before they have had a chance to work, based on late requests whose impacts have not had time to be fully analyzed. The DEAB letter suggests a number of specific zoning code changes which would benefit from further review. Deferring these to the post-adoption period would provide time for that to happen, and time for the market to begin to respond to the new density allowances proposed. This is particularly the case in areas where pending infrastructure improvements may impact apartment viability, such as the Highway 99 Bus Rapid Transit service scheduled to open in 2027.

Specific Action Requested:

- *Adopt zoning code standards as proposed, allowing time to fully evaluate proposed changes and monitor market conditions.*
- *If minimum density changes are sought now, limit those to a modest reduction in the highest density zones from a 40 units per acre minimum to 35 units per acre.*
- *Allow density minimums to be calculated in a way that supports construction 2- and 3-bedroom units, as it is in Vancouver.*
- *Do not allow single family and duplex development in all high-density zones provided density requirements are met, as this can facilitate a problematic built environment, and encourage building low density housing components first, and later seeking rezones or code changes when the remainder goes undeveloped.*

Thank you again for the opportunity to comment. Newly posted hearing materials as you know include comments from the Department of Commerce raising concerns about aspects of the proposed County Comprehensive Plan, and a County response committing to addressing technical and legal gaps transparently. How these issues are resolved may have regional implications , but going into the final scheduled hearing this week there is no indication of how the issues will be addressed, or what options are being considered. Questions raised from our perspective include:

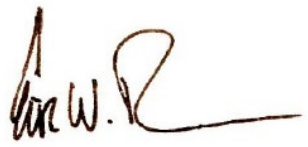
- Will there be changes to growth allocations or assumptions to address the excess capacity reported by the VBLM, and if so what will the review process be?

[2] In support of its recommended VUGA minimum density reductions, the DEAB letter notes that the City of Vancouver adopted a 16-unit per acre minimum, but this is only in Vancouver's Medium Scale Neighborhood zone. Denser apartment development is envisioned in Vancouver's Mixed Use Neighborhood and Regional Activity Center designations which are located across the City and have respective minimum densities of 32 and 64 housing units per acre.

- If the Council interprets agricultural land de-designation criteria for the proposed UGA expansions differently than past discussions suggest, what are the implications for the other de-designation requests?
- If the County takes a legally aggressive position and is found in non-compliance with the GMA and becomes ineligible for grants as it has in the past, what are the implications for proving adequate infrastructure in the unincorporated VUGA?
- What review process is envisioned if there are further changes to proposed Countywide Planning Policy 1.1.24 regarding TDRs? Until more is known about the parameters of the TDR program and its local market viability is studied, we recommend a very generalized policy that does not reference or link to UGA expansions, or commit jurisdictions to implementation on specific timelines

We appreciate that these are all highly complex issues but given their implications we request the Council discuss these and allow for input as appropriate.

Sincerely,



Vancouver City Councilmember Erik Paulsen