From:	Jeffrey Delapena
To:	"Alan Peters"
Cc:	Rebecca Messinger; Steve Hogan; Doug Quinn; Oliver Orjiako; Jose Alvarez
Subject:	FW: Camas Comments for County Council Hearing
Date:	Thursday, October 1, 2026 9:19:00 AM
Attachments:	Camas 10012026.pdf image001.png image002.png image003.png image004.png

Good day, Alan,

Thank you for submitting the City of Camas' comments related to the 2025 Comprehensive Plan update ahead of tonight's Council Hearing

Confirming receipt from Community Planning. 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: Alan Peters <APeters@cityofcamas.us>
Sent: Thursday, October 1, 2026 8:20 AM
To: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Cc: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Steve Hogan <shogan@cityofcamas.us>; Doug Quinn <DQuinn@cityofcamas.us>
Subject: Camas Comments for County Council Hearing

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Hi Rebecca,
Please see attached comment letter for the County Council's hearing on the comprehensive lan update tonight.

Alan Peters, AICP
Community Development Director
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October 1, 2026

Clark County Council
1300 Franklin Street
Vancouver, WA 98660

Dear Chair Marshall and Councilors,

On behalf of the City of Camas, thank you for your leadership and thoughtful work as we approach the adoption of Clark County's comprehensive plan periodic update. Reaching this point represents the culmination of over three years of analysis, public engagement, coordination, and deliberation across Clark County and the cities within it. We appreciate the tremendous work of County staff, the Planning Commission, the County Council, and the cities within Clark County throughout this process.

The City of Camas supports the Planning Commission's recommendation and appreciates its consideration of the needs and plans of Camas and the other cities within Clark County. As the Council considers final adoption, we respectfully ask that it maintain the Planning Commission's recommendation on the issues important to Camas, namely the proposed urban growth area (UGA) expansions of Grove Field and the Nevin property.

Camas has spent the past three years developing its own Our Camas 2045 Comprehensive Plan. Our plan balances Growth Management Act requirements with our community's vision for the next 20 years. Camas has been allocated a 2045 population of 37,080, an increase of almost 10,000 residents, or over one-third of the city's 2024 population. To accommodate this growth, Camas is required to provide capacity for 4,226 housing units and 11,615 jobs.

The city's plan relies on a combination of rezoning within the existing city limits and UGA and targeted UGA expansions to accommodate growth. Camas's plan includes substantial increases in housing capacity within the existing UGA through higher-density residential zoning, new mixed-use zoning, expanded allowances for middle housing and accessory dwelling units, and new redevelopment opportunities in Downtown Camas through the city's draft downtown subarea plan.

Camas's middle housing code provides for at least two residential units per lot and up to four units if at least one unit is affordable. Camas also allows two accessory dwelling units on each residential lot citywide. We have also removed impact fees and system development charges for accessory dwelling units and relaxed utility requirements to encourage infill development and lower development costs.

Camas has proposed to increase the amount of multifamily zoning within the city, but has also already increased development capacity in existing multifamily zones. Developments in multifamily zones can

achieve a 100% density bonus if developed exclusively with apartments. We have also removed barriers to housing development in our downtown area by relaxing mixed-use requirements and have seen some success through the multifamily tax exemption program.

The city has also increased employment capacity through new mixed-use and mixed employment zoning that provides for a broader range of employment uses in zones that were formerly industrial-only, increasing the potential number of jobs per acre.

Much of the remaining land within the Camas UGA is increasingly parcelized, constrained by critical areas, access, and infrastructure, or held by landowners who have shown little interest in developing. Much of the recent development activity has occurred at densities or intensities below those allowed by zoning. The city has taken meaningful steps over the past decade and as part of its proposed periodic update to increase housing supply and affordability, but scarcity of available land and the high cost of available land have limited the extent to which planned capacity has translated into housing production and affordability. According to the VBLM and the FEIS, a no-action alternative would leave the Camas UGA with a surplus of housing units, but also a deficit of 385 jobs and a shortfall of multifamily housing to meet the required HAPT income band targets.

Grove Field

The 83.79-acre proposed Grove Field expansion area is unique in that it is owned by a public entity, the Port of Camas-Washougal, and includes an existing operating airport. While currently located outside of the UGA, the airport exhibits characteristics much more consistent with an urban public facility and employment use than with the rural or resource lands ordinarily located outside UGAs. The site is already substantially committed to airport infrastructure and economic activity, including a paved runway and taxiways, public and private hangars, a fueling facility, a flight school, an aircraft mechanic, and other airport-related operations.

The proposed land use and zoning designation for the property is Mixed Employment, a jobs-focused zone that allows a broad range of employment uses, including light industrial, advanced manufacturing, research and development, office, technology, and compatible artisan or commercial uses. Inclusion of Grove Field in the Camas UGA would provide the Port of Camas-Washougal with urban zoning and infrastructure options more appropriate for its long-term operation and development.

The City has intentionally limited the proposed UGA expansion to the Port-owned airport property and has not proposed inclusion of surrounding privately owned lands. This reflects the City's view that Grove Field presents a distinct circumstance based on its existing public ownership, established airport use, and employment function, rather than a broader strategy to extend the UGA into this area. Limiting the expansion to the airport also helps maintain a clear boundary between this existing public facility and the surrounding rural area.

Nevin

The approximately 161-acre Nevin property is contiguous with the existing Camas UGA and is located near existing and planned urban residential development in Camas and Washougal. The property is approximately two miles from downtown Camas and one-half mile from Camas High School. If included in the UGA, the property would be planned for multifamily residential development and could provide capacity for more than 1,200 housing units, substantially expanding the supply and variety of housing available in eastern Clark County.

The City agrees with the analysis and conclusions regarding the Nevin property contained in the September 24, 2026, letter submitted to Clark County by Jordan Ramis. In particular, the record supports de-designation under WAC 365-190-040(10), WAC 365-190-050(3), and WAC 365-196-310.

Characterization by urban growth

WAC 365-190-050(3)(a) directs jurisdictions to consider whether land is already characterized by urban growth using the criteria in WAC 365-196-310 which expressly permits a UGA to include territory that is itself characterized by urban growth or is adjacent to territory already characterized by urban growth. The Nevin property directly adjoins the Camas UGA on the west and south and is less than one-half mile from the Washougal UGA. Nearly 800 recently completed or developing home sites are located within two miles, and surrounding properties are predominantly residential rather than commercial agricultural operations. Existing and planned urban infrastructure and public facilities, including nearby schools and water infrastructure, further demonstrate the increasingly urban character of the area.

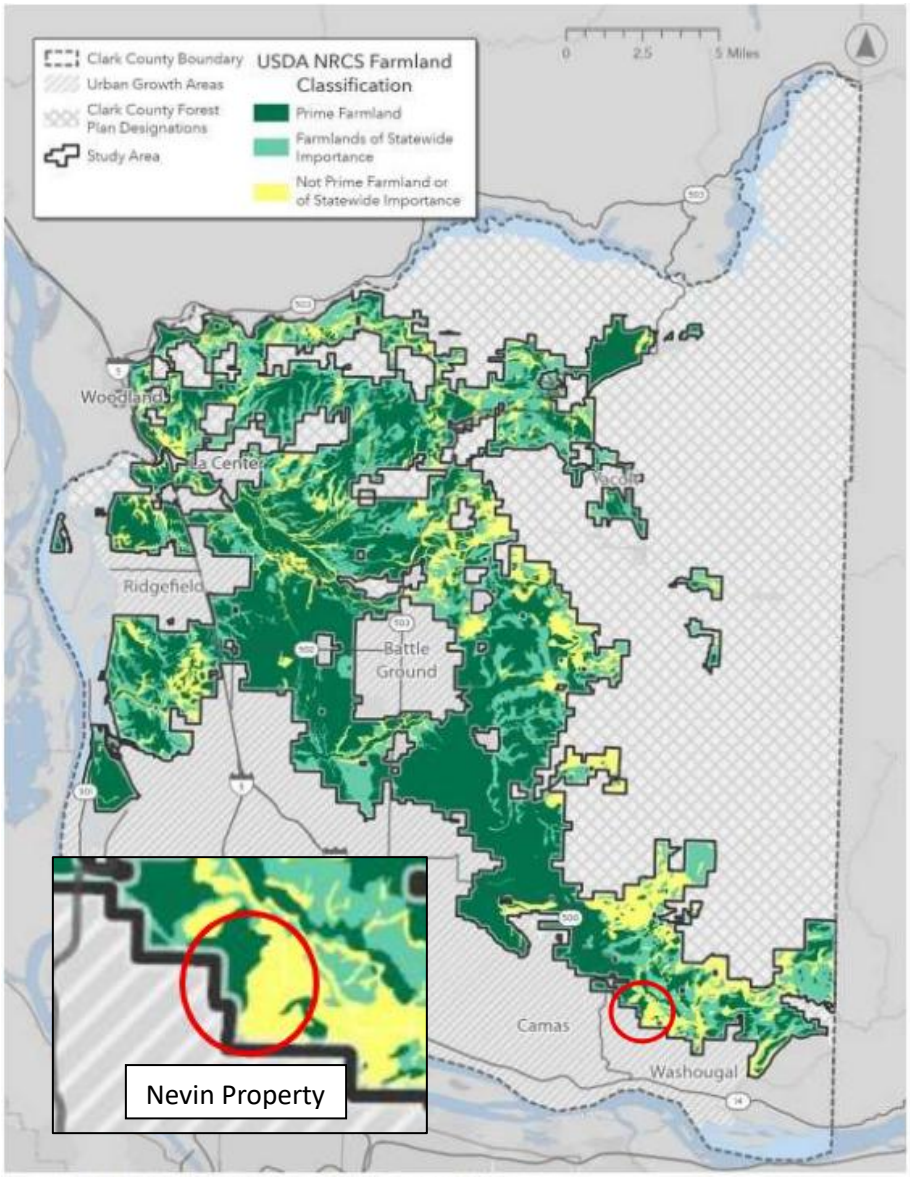
The property consists of seventeen parcels 5 acres or less in size that can currently be developed into low density, sprawling rural residences, as well as one parcel totaling approximately 80 acres. This parcelization among the seventeen lots results in the land having a higher valuation as low density single family residential development than any agricultural use. Large rural residences on 5-acre lots would not promote productive agriculture, and it is likely that the property would be developed into very low density residential under the current zoning and parcel configuration if not included in the Camas UGA.

Agricultural capability and long-term commercial significance

Although portions of the property are physically capable of agricultural use, no crops have been grown on the property for at least 30 years, and any periodic haying has been for weed and fire control rather than commercial sale. The County completed a comprehensive countywide Agricultural Lands Study in accordance with the requirements in WACs 365-190-050 and 365-190-040(10). The study's "Tax Lots in Agricultural Land Designations" map indicates out of the eighteen parcels, eleven 5-acre parcels, totaling approximately 57 acres, could meet the criteria for prime farmland or farmland of statewide significant, but seven parcels totaling approximately 103 acres are not prime farmland or farmland of

statewide significance. These seven parcels should not currently be designated as agricultural lands of long-term commercial significance.

Estimated gross revenue from non-irrigated hay production on those acres is approximately $54,000 annually before equipment, fertilizer, labor, and other expenses. The property contains a mix of agricultural soil classifications rather than uniformly high-quality farmland. Approximately one-half of the property consists of Hesson clay loam classified as Class II and Class IV, while the eastern and central portions include Powell and Odne silt loams classified as Class VI. These soils are principally suited to hay, pasture, grasses, and limited grain production.



Source: USDA NRCS SSURGO (2024), Clark County (2025).

Although the Nevin Expansion would increase the City's overall housing surplus, the expansion is necessary to establish sufficient zoning for multifamily housing for all income bands consistent with the city's long-term comprehensive plan and GMA requirements. Although the UGA expansion will result in a surplus of 2,210 housing units, representing a localized UGA sizing safety factor of 52% for housing, the expansion is needed to ensure adequate housing availability for all income bands throughout the planning period, including housing for those households less than 80% AMI.

The Camas UGA expansions are reasonable as the composite countywide UGA sizing safety factor will be approximately 10% for housing and 2.8% for jobs, which safety factors are consistent with those upheld in other county comprehensive plans.

Conclusion

The City of Camas appreciates the extensive work by Clark County to bring the 2045 periodic update to this point. We request that the County Council approve the proposed Comprehensive Plan and retain the Planning Commission's recommendation to include both Grove Field and the Nevin property within the Camas UGA. Together with the substantial zoning and regulatory changes Camas is making within its existing UGA, these targeted expansions will help the City meet its housing and employment obligations while implementing the community's long-term vision through the Our Camas 2045 Comprehensive Plan.

Sincerely,

Alan Peters
Community Development Director