From:	Jeffrey Delapena
To:	Bryan Snodgrass-Vancouver
Cc:	Oliver Orjiako; Jose Alvarez; Rebecca Messinger
Subject:	FW: City of Vancouver Comments for Comprehensive Plan update
Date:	Friday, October 9, 2026 12:30:00 PM
Attachments:	26 10 09 COV ltr to CCC comp plan.pdf image001.png image002.png image003.png image004.png

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Good day, Bryan,

Thank you for submitting the City of Vancouver's comments related to the 2025 Comprehensive Plan update.

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: Friday, October 9, 2026 12:07 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 Comprehensive Plan update

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Dear Councilors and staff
Attached please find comments from the City of Vancouver following your recent deliberations on the Clark County Comprehensive Plan in advance of your scheduled October 13 consent adoption. Thank you.

October 8, 2026

RE: Clark County Comprehensive Plan follow up

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

This letter is provided in follow up to the County Council deliberations on October 2 and 5 towards the final adoption of the Clark County Comprehensive Plan. We support your preliminary decisions pertaining to the Vancouver UGA, and offer the below for going forward:

1. **We appreciate your decision to have upcoming workplans address the lack of commercial or employment zoning in parts of the VUGA, which does not require the development of full subarea plans.** Formal subarea plans like Highway 99 generate a wide range of issues, goals, and action steps, which isn't necessary to add opportunities for commercial and employment uses. Our request is to consider some small-scale rezones- this will require review and notification of properties but not a lengthy process like creating a full subarea plan. We look forward to resuming discussion on this issue in 2027.

2. **We support your decision to modestly reduce minimum density requirements for apartment zones in the VUGA, but wish to emphasize that this represents only a small portion of the overall residential capacity.** In future years it will be important to monitor high density development using complete data, and to consult with high density apartment developers. However, while higher density residential zoning in the VUGA is needed for the County to meet below market housing requirements of HB 1220, it is only a small part of accommodating total housing capacity. Appendix N of the County materials shows that zones where the 40 unit per acre minimum density were proposed accounted for just 8% of the VUGA's overall buildable land for housing, and just 17% of its total housing unit capacity.

3. **We commend your decision *not* to pursue late market factor assumption increases which would have had significant negative consequences for this update process and its outcomes. Going forward we urge that changes to growth assumptions not be advanced without proper analysis.** The recently proposed market factor increase would have added many months or longer to the already overdue schedule by having to revisit the EIS to

include not just the new growth assumption, but also new mapping of greatly increased UGA expansions of multiple square miles that would be triggered by the assumption change. [1]

If adopted, the market factor increase would be very unlikely to survive a legal challenge, since GMA caselaw requires local market factor choices to be justified if challenged, with data showing why the assumed amount is not likely to develop during the planning period. No data was provided in this case to support the proposed new 20% and 40% market factors. No data was provided to demonstrate that the existing 10% and 30% factors that were recommended almost unanimously by the Buildable Land Project Advisory Committee in 2020 is no longer appropriate. As noted by County staff at the October 2 deliberations, many of the changes in conditions since 2020 have added flexibility and options for development. [2]

Increasing market factor also appears unnecessary from a policy perspective as the GMA already contains several safeguards to ensure that long term housing and land supplies are established at adequate levels, and will not come close to running out:

- Counties may adopt countywide population forecasts to drive local plans that are higher than what the state projects is most likely to occur. Clark County has already taken this step in this update, adopting a countywide forecast that is about 20,000 persons higher than the state has estimated.
- The state housing unit targets that flow from the adopted local population forecast come with large built-in housing vacancy assumptions, as noted by County staff.
- The 20-year land supplies that local plans adopt must be re-stocked based on new growth forecasts at minimum in 10 years, half-way through the planning period. The law further allows full updates sooner than that if needed, which Clark County did in 2007 by adopting an entirely new plan after only three years.

These safeguards should be considered in any realistic discussion about land supply adequacy in our view.

The proposed market factor increase is also inappropriate because if more land for housing is desired, it should be done transparently by increasing growth forecasts and allocations to account for the additional growth that will likely occur. Counties also have more legal latitude in choosing and allocating growth forecasts within the OFM range than they do with market factor and other development assumptions, and can calibrate the growth

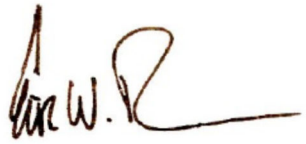
[1] Appendix N shows 6447 acres or 10 square miles of otherwise buildable land is currently removed from the countywide inventory for market factor. Increasing from 10% vacant and 30% underutilized deductions to 20% and 40% deductions would likely result in an increase to 15 square miles or more of otherwise developable land being removed for market factor. Deducting 15 square miles from the inventory would turn what Exhibit 4 of the County materials reports as surplus capacity of 10,498 housing units countywide into a deficit of many tens of thousands of units, triggering the need for UGA expansions of several square miles.

[2] *Thurston County v. Western Washington Growth Management Hearings Board*, 164 Wn.2d 329, 190 P.3d 38 (2008)

increase precisely to match the land use. We are not advocating for this action which would still require revisiting the EIS, but believe it is preferable to an unsupported increase in market factor assumptions which would completely derail the countywide land use planning process and substance that has been completed to date.

Thank you again for your extensive work in getting the process to this point. We look forward to continued collaboration as we all move to implementing our new Comprehensive Plans.

Sincerely,



Vancouver City Councilmember Erik Paulsen