From: Jeffrey Delapena
To: "Heidi Pozzo"; Rebecca Messinger
Cc: Oliver Orjiako; Jose Alvarez
Subject: RE: Comp Plan: Insufficient review of VUGA zoning/density increases
Date: Monday, October 12, 2026 8:09:00 AM

Hello Heidi,

Thank you for providing this comment and attachments. Confirming these have been received and will be added to the Comprehensive Plan Index of Record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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-----Original Message-----
From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Sunday, October 11, 2026 5:40 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: Comp Plan: Insufficient review of VUGA zoning/density increases

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Jeff,

Please find attached my comments on the insufficient review of the VUGA map to evaluate zoning and density and whether the elements balance. Please add to the Comp Plan Index.

Thank you,

Heidi

Comment on the 2025 Comprehensive Plan Update
Vancouver Urban Growth Area Zoning Map

To: Clark County Council
From: Heidi Pozzo
Date: October 11, 2026

Summary

The Vancouver Urban Growth Area (VUGA) zoning map accounts for nearly nine of every ten parcel changes in this update, yet it received very little discussion. The result is significant new density at the outer edges of the growth area, away from jobs and on roads not built for it.

- There was extensive discussion of the Comprehensive Plan in general, in-depth discussion of agricultural land, and discussion of the methodology for the plan. There was very little discussion of the VUGA mapping.
- The VUGA accounts for 8,221 of the 9,281 parcel changes (89%) listed in the County's Parcel Number Detail for the adopting ordinance.
- Density was increased in three ways: consolidation of the medium- and high-density zones (by far the largest impact), site-specific requests, and a third group of changes for which the Parcel Number Detail shows how the density increases were applied, but nothing identifies what originated them.
- County staff stated on the record that the urban medium zones are the only land base available to meet the income targets, and that a detailed analysis of the available parcels had not been done. Significant density was placed at the outside edges of the growth area, where there is little commercial land or employment.
- Land that has not yet been through the development process is being upzoned in areas where roads already exceed the County's capacity standard. In the 179th Street area, the developer-commissioned traffic studies show the roads failing even with the planned improvements credited as complete, and those improvements are not funded (Table 6; March 1, 2026 comment, Sections 4 and 7). Adding density in these areas is not appropriate.
- The 179th Street area is one example. Staff stated on October 5, 2026 that the zone changes there will apply to the remaining parcels that have not developed, including vacant land in the OR-36 area. The Council Chair said bringing in the area without the planning and funding for infrastructure "was not our best effort," and Councilor Yung said there was no "real way to unwind that." The upzoning was left in place.
- The same conditions exist elsewhere but were not discussed in the Council's October 2 and 5 deliberations. Along 119th Street east of SR-503, R-36 and R-50 parcels sit at the edge of the growth area, and both 119th Street and SR-503 are above the County's capacity standard (Table 6).
- The roads serving these edge areas lack capacity for this level of development, and the RTC regional transportation analysis would not have picked up these gaps.

- As a result, the plan does not balance housing, jobs and transportation, and vehicle miles traveled (VMT) will increase. The GMA requires that balance and internal consistency when the plan is adopted. Deferring commercial land and road capacity to later work plans does not meet that requirement.

1. Where the Zoning Changes Are

Table 1. Parcel Changes by Area

Area	Parcels	Share
Vancouver UGA	8,221	89%
Battle Ground UGA	700	8%
Ridgefield, Washougal, Camas, La Center and Yacolt UGAs	299	3%
Overlay changes (mobile home park, freight rail)	61	1%
Total	**9,281**	**100%**

Source: Parcel Number Detail (Exhibit 3A to the ordinance adopting the 2025 Comprehensive Growth Management Plan Update), County Council meeting materials, October 13, 2026.

2. Three Ways Density Was Increased in the Vancouver UGA

Table 2. Methods Used to Increase Density

Method	Decision Table Item	Parcels	Information Provided
Consolidation of medium- and high-density zones	Item 11	6,785	Zone conversions listed. Planning Commission motion to approve as presented failed 3–4.
Site-specific requests	Items 16–24	16	Each request identified by parcel number and requested zone.
Other changes	Item 12, Item 13, or no matching item	1,420	Item 12 identifies no parcels, densities, selection criteria or map. Several change types match no Decision Table item.
Total		**8,221**	

Source: Planning Commission/Council Decision Table (Exhibit 1), County Council hearing materials, October 1, 2026 (updated September 29, 2026); Parcel Number Detail (Exhibit 3A to the ordinance adopting the 2025 Comprehensive Growth Management Plan Update), County Council meeting materials, October 13, 2026.

- **Consolidation is by far the largest.** Parcels in the five existing medium- and high-density zones were moved into new zones with higher minimum and maximum densities: R-12 to R-24; R-18 and R-22 to R-36; R-30 and R-43 to R-50. Office residential zones were converted the same way. Twenty-two R-18 parcels were moved to R-24 or R-50 instead of R-36 (Table 3).
- **Site-specific requests are small in number.** These were identified parcel by parcel.

- **The origin of the third group is not identified.** The Parcel Number Detail shows the zone change applied to each parcel, but the Decision Table does not identify the request, selection criteria or staff recommendation that originated these changes. Table 3 breaks them down.

Table 3. Changes in the Third Group

Change	Parcels	Matching Decision Table Item
Single-family (R1-5, R1-6, R1-7.5) to multifamily (R-24, R-36, R-50)	689	Item 12: "certain properties" adjacent to medium- and high-density districts; no parcels listed
R1-10 to R1-6	684	None. Item 13 describes R1-10 and R1-20 to R1-7.5.
R1-10 to R1-7.5	9	Item 13
R-18 to R-24 and R-18 to R-50	22	None. Item 11 converts R-18 to R-36.
Mixed Use to Business Park	8	None
Neighborhood Commercial to R-36	6	None
R1-6 to Community Commercial	2	None
Total	**1,420**	

Source: Planning Commission/Council Decision Table (Exhibit 1), County Council hearing materials, October 1, 2026 (updated September 29, 2026); Parcel Number Detail (Exhibit 3A to the ordinance adopting the 2025 Comprehensive Growth Management Plan Update), County Council meeting materials, October 13, 2026.

3. Size of the Density Increases

Table 4. Density Before and After (housing units per acre)

Change	Parcels	Before	After (minimum–maximum)
R-12 to R-24	1,466	8–12	18–24
R-18 to R-36	3,011	12–18	24–36
R-22 to R-36	769	15–22	24–36
R-30 to R-50	837	18–30	35–50
R-43 to R-50	580	20–43	35–50
R1-5 to R-24	85	10.9 detached; 21.8 townhouses	18–24
R1-6 to R-24	6	7.9 detached; 21.8 townhouses	18–24
R1-7.5 to R-24	121	6.7 detached; 21.8 townhouses	18–24
R1-6 to R-36	146	7.9 detached; 21.8 townhouses	24–36

Change	Parcels	Before	After (minimum–maximum)
R1-7.5 to R-36	214	6.7 detached; 21.8 townhouses	24–36
R1-6 to R-50	90	7.9 detached; 21.8 townhouses	35–50
R1-7.5 to R-50	27	6.7 detached; 21.8 townhouses	35–50

Source: Parcel Number Detail (Exhibit 3A to the ordinance adopting the 2025 Comprehensive Growth Management Plan Update), County Council meeting materials, October 13, 2026; CCC 40.220 Urban Residential Districts, July 15, 2026 Draft, County Council work session materials, July 22, 2026: Table 40.220.020-2, p. 20 (R and OR zones, current and proposed ranges), Table 40.220.010-2, p. 7 (R1 zones, maximum density for single-family detached and duplex), and Table 40.220.010-4, p. 9 (R1 zones, maximum townhouse density); R-50 minimum as amended by the County Council on October 5, 2026 (Item 65). Before figures for R zones are the current ranges; for R1 zones they are the proposed maximums.

- Former R-12 parcels now have a minimum density (18) higher than their previous maximum (12). Former R-30 parcels have a minimum (35) higher than their previous maximum (30).
- The R-18 maximum doubles, from 18 to 36.
- Single-family parcels moved to R-36 or R-50 go from a maximum of 6.7 to 7.9 detached homes per acre, or 21.8 townhouses per acre, to a required minimum of 24 or 35 units per acre and a maximum of 36 or 50.

4. How the VUGA Map Was Approved

- The July 30, 2026 Planning Commission work session on the housing code covered the code changes only. The zoning map changes and parcel selections were not presented.
- The County posted updated maps showing the proposed zoning and urban growth area changes. The maps were not discussed to show where zoning changed within the VUGA or where density increased, and no parcel table was available until October 9, 2026.
- At the January 29, 2026 Planning Commission hearing, Vancouver UGA items 2.K through 2.W were bundled into a single motion and approved 7–0 with no discussion (Minutes, pp. 34–36).
- At the September 3, 2026 Planning Commission hearing, maps were available only “as-needed” (Minutes, p. 6).
- At that hearing, the first part of the Decision Table received extensive discussion: the urban growth area expansions and agricultural land (Items 1–10, Minutes pp. 6–29) and the zone consolidation (Item 11, pp. 30–36), each with its own vote. The motion to approve Item 11 as presented failed 3–4.
- The remaining Vancouver UGA map items were then grouped. Items 12 through 17 were approved in a single 7–0 vote with no discussion, and the descriptions of Items 12, 13 and 14 were not read aloud (pp. 40–41). Items 18, 19 and 21 through 24 were approved in a second grouped vote (p. 43). The only Vancouver UGA site-specific request discussed was Item 20, after a commissioner asked to see it on the map (pp. 43–45).

- At the Council hearing on October 2, 2026, the urban growth area expansions and agricultural land (Items 1–9) took most of the day. The Chair noted the time as 2:30 after Item 9. Items 10 through 24 were then taken up before the afternoon break at about 3:10.
- When Item 12 was moved at the Council, Councilor Yung asked what it was "actually changing to" and noted that it "doesn't say what it's changing to." The Chair responded "Close enough," and Item 12 passed 5–0 with no parcels or map identified. Before Item 23, the Chair asked to refer to the remaining items by number only.
- On October 5, 2026, the Council completed the code items, approving Items 67, 69–73, 75–86 and 88–91 in grouped votes.

5. What the Record Shows

Table 5. Statements on the Record

Date	Meeting	Time / Page	Statement
Jan. 29, 2026	Planning Commission hearing	Minutes, pp. 37–38	Staff (Jose Alvarez): the state low-income goals cannot be met without the zone consolidation.
July 22, 2026	Council work session	16:25	Consultant (Elizabeth Decker): the updates are intended to make the most efficient use of the "limited medium and high density sites."
July 22, 2026	Council work session	17:43	Consultant (Elizabeth Decker): the county is looking to add capacity for 26,500 homes affordable to households below 80% of area median income and currently has capacity for about 7,000.
July 22, 2026	Council work session	40:25	Staff (Jose Alvarez): "we've not done a detailed analysis of all of the parcels available."
July 22, 2026	Council work session	59:36	Council Chair Marshall: on the east side of 179th Street there is one park "and then nothing"; "a lot of housing is going in" and it is "totally car dependent."
July 22, 2026	Council work session	1:36:44	Staff (Jose Alvarez): the urban medium zones are "the only land base we have that would allow us to meet these income band targets."
July 22, 2026	Council work session	1:45:30	Community Planning Director Oliver Orjiako: apartments should be zoned in multifamily districts, "not at the periphery."
July 30, 2026	Planning Commission work session	6:05	Consultant (Elizabeth Decker): the R1 low-density zones are "about 87%" of the county's buildable residential land.

Date	Meeting	Time / Page	Statement
July 30, 2026	Planning Commission work session	8:46	Consultant (Elizabeth Decker): the goal is capacity for over 26,000 homes below 80% of area median income; current capacity is about 7,000.
July 30, 2026	Planning Commission work session	14:16	Consultant (Elizabeth Decker): the R-24 zone is used as "a buffer or a transition" next to the R1 low-density zones.
July 30, 2026	Planning Commission work session	35:36	Staff (Jose Alvarez), responding to Commissioner Barca: site-specific requests along SR-503 involve remainder mixed-use commercial properties that "have never gotten commercial interest."
July 30, 2026	Planning Commission work session	37:45	Staff (Jose Alvarez): in the Highway 99 overlay, there is "not a lot of just vacant land."
Sept. 3, 2026	Planning Commission hearing	Minutes, p. 44	Staff (Jose Alvarez): the Item 20 property just south of 119th Street along SR-503 has had difficulty getting commercial access from the State near the intersection; the proposal would change it to multifamily with access through the back.
Oct. 2, 2026	Council hearing	Item 18	The City of Vancouver letter of September 29, as read into the record, asked for a commercial component along 119th Street for Item 18 (about 45 acres on the south side of 119th Street, east of 87th Avenue). Councilor Yung: "we have substantially up zoned some properties that do not have any access to amenities…they're too far away from…anything." The Council directed that commercial zoning be examined in the 2027 work plan.
Oct. 2, 2026	Council hearing	Item 20	Community Planning Director Oliver Orjiako: the Item 20 property owners testified to "not having access through SR 503" because of access management control.
Oct. 2, 2026	Council hearing	Opening questions	Staff: in the Pleasant Valley area (139th Street, around 29th to 50th Avenue), "we are proposing up zoning in that area" to R-36.
Oct. 2, 2026	Council hearing	Item 38	Council Chair Marshall, on the $554 million Capital Facilities shortfall: "We've expanded and we haven't done our due diligence."

Date	Meeting	Time / Page	Statement
Oct. 5, 2026	Council hearing	Item 65	Councilor Yung raised stopping the upzoning in the former 179th Street urban holding area because of "the infrastructure challenges and the frustrations that the current residents are experiencing," then said he would not make the motion: "I don't think there's a real way to unwind that."
Oct. 5, 2026	Council hearing	Item 65	Council Chair Marshall: "the cat is very much out of the bag…don't do this again to bring in such a huge area really without fully doing the planning and having in place realistic numbers for what it will take to pay for the infrastructure. It was not our best effort."
Oct. 5, 2026	Council hearing	Item 65	Staff, on the 179th Street area: in the OR-36 area "there are some areas in there that have already developed. And there's, I believe, some vacant land in that area." Community Planning Director Oliver Orjiako: the zone change "will only impact any remaining parcels that haven't developed."
Oct. 5, 2026	Council hearing	Item 65	Staff: within the unincorporated Vancouver UGA, capacity is "very, very tight."

Source: Planning Commission Hearing Minutes, January 29, 2026 and September 3, 2026; Clark County Council Hearings, October 2 and October 5, 2026, CVTV transcripts; Clark County Council Work Session, July 22, 2026, YouTube recording (https://youtu.be/23CYez5lODI); Clark County Planning Commission Work Session, July 30, 2026, YouTube recording (https://youtu.be/dXPL0J9a5xk). Time stamps are from the YouTube recordings.

- Multifamily was placed based on where medium- and high-density land exists, without a detailed analysis of the parcels.
- The density increases are aimed at raising capacity for households below 80% of area median income from about 7,000 homes to 26,500.
- The east side of 179th Street, where density is being added, was described by the Council Chair as car dependent with little park space. On October 5, 2026, the Chair and Councilor Yung acknowledged the infrastructure problems in the 179th Street area but left the upzoning in place, although staff confirmed the change applies to parcels that have not yet developed.
- The City of Vancouver asked for commercial or employment zoning in a number of upzoned areas, including along 119th Street for Item 18, and Councilor Yung stated that properties had been upzoned without access to amenities. The commercial land was deferred to the 2027 work plan.
- The edge upzones place apartments at the periphery of the growth area, which the Community Planning Director said is not where apartments belong.

- Along SR-503, mixed-use land intended for commercial use is being converted to multifamily because it drew no commercial interest, reducing commercial land at the edge of the growth area.
- Staff acknowledged that access to the state highway at the 119th Street/SR-503 intersection is constrained, yet multifamily is being added at that location.
- Staff stated that the Highway 99 overlay has little vacant land (July 30, 2026, 37:45).

6. Result

Multifamily placed at the edges

- Significant density is placed at the outside edges of the growth area, including the 179th Street area, formerly in urban holding, and the SR-503/119th Street area (Clark County 2025 Comprehensive Plan zoning map, clark.wa.gov; County Council hearing, October 5, 2026).
- On the 2025 zoning map, R-36 and R-50 parcels sit directly across the urban growth boundary from rural and agricultural zoning, including along 119th Street east of SR-503 (Clark County 2025 Comprehensive Plan zoning map, clark.wa.gov).
- The Land Use Element requires that areas planned for Urban Medium density "shall be located near commercial uses and transportation facilities" and that Urban High density areas "shall be located in transit corridors and near commercial and employment centers…while providing easy access to employment." Future amendments to the plan map must be consistent with these descriptions (Chapter 1, Council work session draft, July 22, 2026, p. 11, lines 21–23 and 32–34; p. 8, lines 38–41).
- Policy 1.1.15 calls for higher densities along transit corridors and lower densities in "neighborhoods on the fringes of the urban area." Policy 1.3.1 calls for "less intensity in areas where urban development is of lower density or has not yet occurred, or in areas where urban services do not yet exist." Policy 1.4.9 states that higher intensity uses should be located on or near streets served by transit (Chapter 1, pp. 25, 30, 31).
- The Land Use Element also states that the land use map "must not specify a land use development pattern which cannot be adequately served by transportation and other services" (Chapter 1, p. 2, lines 13–15).
- These areas have little commercial land nearby. The City of Vancouver asked for a commercial component along 119th Street for Item 18, Councilor Yung stated that properties had been upzoned without access to amenities, and mixed-use land along SR-503 is being converted to multifamily because it drew no commercial interest (Table 5: County Council hearing, October 2, 2026, Item 18; Planning Commission work session, July 30, 2026, 35:36).

Roads lack capacity

- The draft code lists the factors to be considered in applying the R-24, R-36 and R-50 districts to a site, including proximity to major streets and the available capacity of these streets, vehicular and pedestrian traffic circulation, and proximity to commercial services (CCC 40.220.020(A)(1)(b), July 15, 2026 Draft, p. 12).

Table 6. Roads Serving the Edge Upzones

Road	Condition	Source
179th Street, I-5 to 15th Avenue	Volume-to-capacity ratio 1.12 to 1.17 in four of five developer-commissioned traffic studies (standard is 0.90), using four-lane capacity for a two-lane road; above 2.0 at actual capacity	March 1, 2026 comment, Table 4a
179th Street, Delfel Road to I-5	Volume-to-capacity ratio 1.044 to 1.061 in three developer-commissioned studies	March 1, 2026 comment, Table 4a
10th Avenue, 189th Street to 179th Street	Volume-to-capacity ratio 1.333 to 1.334 in three developer-commissioned studies	March 1, 2026 comment, Table 4a
50th Avenue, 179th Street to 174th Street	Volume-to-capacity ratio 1.130	March 1, 2026 comment, Table 4a
50th Avenue / 179th Street intersection	Level of service F under background and total conditions; roundabout not funded, 2035 or later	March 1, 2026 comment, Section 4 and attached summary, Section 1
72nd Avenue	Classified as a four-lane principal arterial (1,800 vehicles per hour) but exists as a two-lane road with no curbs, sidewalks or bike lanes	March 1, 2026 comment, Sections 3 and 7
119th Street, SR-503 to 152nd Avenue	Volume-to-capacity ratio 0.97 to 1.10, PM peak	Exhibit 100, Table 1, p. 3
99th Street, SR-503 to 124th Avenue	Volume-to-capacity ratio 0.92 to 1.01, AM and PM peak	Exhibit 100, Table 1, p. 3
76th Street, SR-503 to 130th Avenue	Volume-to-capacity ratio 1.034 to 1.06	Exhibit 100, Table 1, p. 3
SR-503, UGA north boundary to NE 65th Street	Volume-to-capacity ratio 0.928 to 1.066, AM and PM peak; state route under WSDOT jurisdiction	Exhibit 100, Table 1, p. 3; County Council hearing, October 2, 2026, Item 20

Source: Comment to Council, "How the arterial atlas and County code created a system that results in approving developments while infrastructure fails/Concurrency and Comp Plan implications," March 1, 2026, Index of Record (https://websvc2.clark.wa.gov/CommunityPlanning/2025CompPlanUpdate/38415429.pdf), compiling the developer-commissioned transportation studies for NE 174th Street Subdivision, Three Creeks East, Four Creeks North, Kozy Manor Estates and the Ridgefield School District middle school; Daniel Stumpf, PE, PLS Engineering, Failing Corridor Evaluation Memorandum, May 11, 2026 (Exhibit 100, PLD-2026-00002), Index of Record (https://websvc2.clark.wa.gov/CommunityPlanning/2025CompPlanUpdate/38728535.pdf); Clark County Council hearing, October 2, 2026, CVTV transcript.

- Developer-commissioned traffic studies apply the Arterial Atlas buildout capacity to roads not built to their classified standard. Two-lane roads, including 179th Street east of I-5 and 72nd Avenue, are credited with four-lane capacity, which understates the failures shown in Table 6 (March 1, 2026 comment, Sections 2, 3 and 7).
- Exhibit 100, prepared by Daniel Stumpf, PE, of PLS Engineering and addressed to Brent Davis, Clark County, identifies 19 corridors in the Vancouver UGA above the 0.90

standard, based on 27 traffic studies prepared throughout Clark County. It states that approximately 36 planned projects, including about 2,000 residential units, may be denied if the standard is applied as written (Exhibit 100, pp. 2–3, 10). It was submitted to the Comprehensive Plan record on May 20, 2026, with a transmittal identifying Mr. Stumpf as the traffic engineer for the 174th Street Subdivision.

- SR-503 is a state highway (Exhibit 100, Table 1, p. 3). Access to it is controlled by the State, and the County does not control whether lanes are added to it (County Council hearing, October 2, 2026, Item 20; Planning Commission hearing, September 3, 2026, Minutes, p. 44).
- The widening of 179th Street between 29th and 50th Avenue is not on the Reasonably Funded Project List and is scheduled for 2031–2033. The I-5/179th Street interchange reconstruction is a WSDOT project with an earliest completion of 2031 (March 1, 2026 comment, attached summary, Section 1).
- Under CCC 40.350.020(G)(1)(a), roads not built to county standard carry lower capacity, 600 to 800 vehicles per hour per lane, than a road built to standard.

RTC analysis would not have picked up the gaps

- The regional model assumed construction of the projects on the 2024 Regional Transportation Plan 6-year and 20-year project lists (Final EIS, Vol. 1, Section 3.9.2(A)). The modeled network is the existing network plus RTP improvements (Chapter 5, Planning Commission draft produced August 4, 2026, p. 50, lines 12–14).
- Intersections with Transportation Improvement Program projects were excluded from the deficiency screen. Road segments with TIP or RTP projects were coded as built in the 2045 model network, so they cannot show a deficiency (Final EIS, Vol. 1, Section 3.9.2(B), pp. 132–134).
- RTC staff stated that regional travel demand models are not operational traffic models: demand can exceed capacity, and the excess demand does not queue and spill onto downstream links (County responses to DEIS questions, Q15–Q16).
- The DEIS transportation consultant stated that a comparison of the RTC regional model to individual subarea or corridor studies was not part of the DEIS (County responses to DEIS questions, Q12 and Q14). The developer traffic studies in Table 6 show the failures the regional model does not.
- RTC staff stated that the 2045 Regional Transportation Plan assumes no fixed-route transit service on 179th Street; growth in the corridor has automobile access only (County responses to DEIS questions, Q25).

Housing, jobs and transportation are not balanced

- The GMA requires the plan to be internally consistent when adopted (RCW 36.70A.070), and the plan's own policy requires urban growth areas to provide a balance of industrial, commercial and residential lands (Chapter 1, Policy 1.2.2, p. 29). Since November 2024, the City of Vancouver has repeatedly asked the County to add commercial or employment land near upzoned areas, stating that VMT reduction is “likely impossible” otherwise. It asked for a commercial component on large upzone proposals and for supportive commercial or employment zoning in a number of upzoned areas (City of Vancouver

letters, November 6 and 26, 2024, Index of Record; DEIS comment, November 10, 2025, Final EIS comment index 59; letter of September 29, 2026). The Council adopted the upzoning and deferred the commercial land to the 2027 work plan. Deferring to a later work plan does not meet that requirement.

- Placing large amounts of housing at the edges of the growth area, far from jobs and services and with no fixed-route transit planned, lengthens trips and increases VMT. HB 1181 requires the greenhouse gas emissions reduction subelement of the climate element to identify actions that will result in reductions in per capita vehicle miles traveled (RCW 36.70A.070(9)(d)(i)(B)). Clark County is one of the 11 counties required to adopt that subelement (RCW 36.70A.095).
- The housing element must consider housing locations in relation to employment location (RCW 36.70A.070(2)(d)(iii)).
- The plan elements are not balanced between housing, jobs and transportation. The Growth Management Act requires the plan to be internally consistent and the transportation element to be consistent with the land use element (RCW 36.70A.070 and RCW 36.70A.070(6)).

Please enter this comment into the Index of Record for the 2025 Comprehensive Plan Update.

Heidi Pozzo