

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Submission: Contact City Council
Date: Monday, April 13, 2026 10:13:58 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
Pronouns: She/Her/Hers
CITY OF VANCOUVER, WASHINGTON
City Manager's Office (CMO)
Primary (Cell): 360-624-2949 | **Desk:** 360-487-8641
www.cityofvancouver.us

From: City of Vancouver, WA <noreply@cityofvancouver.us>
Sent: Friday, April 10, 2026 12:57 PM
To: City Council <council@cityofvancouver.us>
Subject: Submission: Contact City Council

Contact the City Council

Name
Zachary Lauritzen
Email

Address
United States Map It
Subject
Share an Opinion of a City project or Initiative
Choose Recipient
All the Council
Message
Hello! Please share the attached letter with the Vancouver City Council. Warm regards, Zachary Lauritzen Oregon Walks

File

- [LRT-Multiuse-Path-extension-to-library_Oregon-Walks.docx.pdf](#)



PROTECTING YOUR
RIGHT TO ROAM

April 10th, 2026

RE: Extending Light Rail and Multiuse Path to Library

Dear Mayor McEnerny-Ogle and the Vancouver City Council,

We strongly support Mayor McEnerny-Ogle's resolution (Council Agenda, April 13th, Resolution 11) recommending the extension of light rail to Library Square, consistent with the original Modified Locally Preferred Alternative. This alignment is essential to realizing the full potential of the project as a truly multimodal investment. It is also imperative to realize the benefits of transit for congestion relief across the bridge.

Additionally, we request that you add an additional component to this resolution calling for the extension of the multiuse path to Library Square as well.

The current plan for accessing Library Square by foot or bike requires a 100-foot descent via a half-mile spiral ramp, followed by an uphill return through downtown. We've dubbed this the "Vancouver Dip." If we want people to choose walking and biking—key strategies for reducing congestion and pollution—we cannot require them to travel both out of direction by half a mile and out of elevation. **Human-powered travelers should face the fewest barriers, not the most.**

Terminating either light rail or the multiuse path at the waterfront falls well short of delivering meaningful multimodal connectivity between Portland and Vancouver. We strongly urge the Council to ensure that any light rail extension to Library Square is paired with a direct and connected multiuse path. This is critical to delivering a project that truly serves all users and meets our shared congestion, climate, and access goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Zachary Lauritzen".

Zachary Lauritzen
Oregon Walks

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Submission: Contact City Council
Date: Monday, April 13, 2026 10:20:28 AM

testimony

Sarah Dollar | Executive Assistant to the City Council
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From: City of Vancouver, WA <noreply@cityofvancouver.us>
Sent: Saturday, April 11, 2026 10:32 AM
To: City Council <council@cityofvancouver.us>
Subject: Submission: Contact City Council

Contact the City Council

Name
Miriam Hammer
Email
[REDACTED]
Phone
[REDACTED]
Address
[REDACTED] Vancouver, WA 98663 United States Map It
Subject
Share an Opinion of a City project or Initiative
Choose Recipient
All the Council
Message

I support the extension of IBR Light Rail to the original Modified Locally Preferred Alternative terminus at Library Square. As someone who uses public transit, walking, and bicycling to get around Vancouver, I ask that the multimodal connections of IBR be strongly linked to the transit connections available at Library Square. Terminating either Light Rail or the Multi Use Path at the Waterfront is not a real solution to have multimodal connections between Portland and Vancouver.

In the current plan, accessing Library Square from IBR by walking or biking would require descending 100 feet on a half-mile long spiral ramp, and then biking back uphill through downtown. Cycle Vancouver dubbed this "the Vancouver Dip." The current plan also does not connect transit with the Multi Use Path. This must be corrected in order for transit to be truly useful.

I strongly request that a Light Rail connection from the Waterfront to Library Square also include the Multi Use Path. Thank you very much for your consideration.

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Submission: Contact City Council
Date: Monday, April 13, 2026 10:38:18 AM

testimony

Sarah Dollar | Executive Assistant to the City Council
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From: City of Vancouver, WA <noreply@cityofvancouver.us>
Sent: Sunday, April 12, 2026 10:54 AM
To: City Council <council@cityofvancouver.us>
Subject: Submission: Contact City Council

Contact the City Council

Name
Constance Pappas
Email
[REDACTED]
Phone
[REDACTED]
Address
[REDACTED] Vancouver 98661 United States Map It
Subject
Share an Opinion of a City project or Initiative
Choose Recipient
All the Council
Message

I am a cyclist and this city must do better and be more proactive. Please!

1. Support extension of IBR Light Rail to the original Modified Locally Preferred Alternative terminus at Library Square
2. We want to see the multimodal connections of IBR strongly linked to the transit connections available at LibrarySquare
3. Terminating either Light Rail or the Multi Use Path at the Waterfront is absolutely not a real solution to have multimodal connections between Portland and Vancouver. We must move forward and stop isolating communities!
4. In the current plan, accessing Library Square from IBR by walking or biking would require descending 100 feet on a half-mile long spiral ramp, and then biking back uphill through downtown. We've dubbed this "the Vancouver Dip"
5. Today's plan also does not connect transit with the Multi Use Path. This MUST be corrected.
6. We strongly request that a Light Rail connection from the Waterfront to Library Square also include the Multi Use Path so ALL citizen can have access!

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Submission: Contact City Council
Date: Monday, April 13, 2026 10:22:53 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
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From: City of Vancouver, WA <noreply@cityofvancouver.us>
Sent: Saturday, April 11, 2026 12:57 PM
To: City Council <council@cityofvancouver.us>
Subject: Submission: Contact City Council

Contact the City Council

Name
Jan Verrinder
Email
[REDACTED]
Phone
[REDACTED]
Address
[REDACTED] VANCOUVER, WA 98661 United States Map It
Subject
Share an Opinion of a City project or Initiative
Choose Recipient
All the Council
Message

Hello Councilors, Mayor, and City Manager,

I'm interested in two points of the IBR plans.

First, we're bringing light rail to the Waterfront, but I read that Council believes it's also essential to extend LR to the Library Square. I agree.

Second, my concern: extra distance and elevation are traditionally what transportation planning has delivered to people trying to get somewhere without using a car.

If connecting people to a transit hub is essential to make the IBR work, that includes me on my bike and the many people I meet who are walking over the bridge, right?

Last night while riding to the food carts at Delta Park (missing MOST of the rain!), we encountered several other riders and walkers, too. This is almost always my experience on the bridge.

Stopping the MUP at the Waterfront would mean we walk or roll via the Vancouver Dip - down from the bridge and back up to the transit hub. Elevation and out of direction travel is old thinking.

We have one shot to do this right. We know what to do to make the ideas of active transportation, effective transit, and healthier climate real.

Let's do it.

Thank you,
Jan

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Submission: Contact City Council
Date: Monday, April 13, 2026 10:20:46 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
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From: City of Vancouver, WA <noreply@cityofvancouver.us>
Sent: Saturday, April 11, 2026 10:50 AM
To: City Council <council@cityofvancouver.us>
Subject: Submission: Contact City Council

Contact the City Council

Name
Eric Prileson
Email
[REDACTED]
Phone
[REDACTED]
Address
[REDACTED] Vancouver 98661 United States Map It
Subject
Share an Opinion of a City project or Initiative
Choose Recipient
All the Council
Message

My comments are related to the IBR and the multimodal and transit connections that are coming with it.

1. I urge you to support extension of IBR Light Rail to the original Modified Locally Preferred Alternative terminus at Library Square
2. I want to see the multimodal connections of IBR strongly linked to the transit connections available at Library Square
3. Terminating either Light Rail or the Multi Use Path at the Waterfront is not a real solution to have multimodal connections between Portland and Vancouver
4. In the current plan, accessing Library Square from IBR by walking or biking would require descending 100 feet on a half-mile long spiral ramp, and then biking back uphill through downtown. This is known as "the Vancouver Dip"
5. Today's plan also does not connect transit with the Multi Use Path. This should be corrected.
6. I strongly request that a Light Rail connection from the Waterfront to Library Square also include the Multi Use Path

Thank you!

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: No Title
Date: Monday, April 13, 2026 10:39:10 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
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From: Katy Salinas <[REDACTED]>
Sent: Sunday, April 12, 2026 2:32 PM
To: City Council <council@cityofvancouver.us>; [REDACTED]
[REDACTED]
[REDACTED]; Pluckhahn, Lon <lon.pluckhahn@cityofvancouver.us>
Subject: No Title

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello Mayor Ann, City Manager and Council,

As a homeowner and longtime resident of Vancouver, I am writing to you with regard to decisions about the interstate bridge replacement (IBR) and light rail.

This is a vital piece of transportation that will lead us into the future. It must be built right with a long-term vision that includes multimodal mobility and reduced climate impacts.

I encourage you to support extension of IBR Light Rail to the Preferred Alternative terminus at **Library Square**. This would enable linkages to transit connections and provide light rail access to a larger populace. While the light rail must also connect with the multiuse path and waterfront, terminating it at the waterfront lacks true transportation connections and limits access for the community due to the distance and steeper grade.

We have a unique opportunity to make our community stronger and more resilient into the future. This will provide individuals without cars or difficulty walking long distances with true connectivity and empowerment. It will help Vancouver reduce harmful particulate emissions and work towards meeting our climate goals. It makes good sense. Let's do it right!

Katy Salinas
Hough Neighborhood
Vancouver, WA

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: IBR Multimodal and Transit Connections
Date: Monday, April 13, 2026 10:18:22 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
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From: Tommy Hughes [REDACTED] >
Sent: Saturday, April 11, 2026 9:51 AM
To: City Council <council@cityofvancouver.us>; [REDACTED]
[REDACTED]
[REDACTED]; Pluckhahn, Lon <lon.pluckhahn@cityofvancouver.us>
Subject: IBR Multimodal and Transit Connections

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello Councilors

As a resident and homeowner in the city of Vancouver, I wanted to express my support for the following topics that will be covered in tomorrow's City Council meeting:

1. I support extension of IBR Light Rail to the original Modified Locally Preferred Alternative terminus at Library Square.
2. I want to see the multimodal connections of IBR strongly linked to the transit connections between Portland and Vancouver.
3. Terminating either the Light Rail or the Multi Use Path at the Waterfront is not a real solution for creating multimodal connections between Portland and Vancouver.
4. In the current plan, accessing Library Square from IBR by walking or biking would require descending 100' on a half-mile long spiral ramp and then biking back uphill through downtown. This is known as the "Vancouver Dip".
5. Today's plan also fails to connect transit with the Multi Use Path. This should be corrected.
6. I strongly request that the Light Rail connection from the Waterfront to Library Square also include the Multi Use Path.

Thank you for your consideration.

Tom Hughes

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Interstate Bridge Replacement
Date: Monday, April 13, 2026 10:38:45 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
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CITY OF VANCOUVER, WASHINGTON
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From: Amy Horstman <[REDACTED]>
Sent: Sunday, April 12, 2026 10:59 AM
To: City Council <council@cityofvancouver.us>; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Pluckhahn, Lon <Lon.Pluckhahn@cityofvancouver.us>
Cc: Amy Horstman <[REDACTED]>
Subject: Interstate Bridge Replacement

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello Mayor Ann, City Manager and Council,

As a homeowner and longtime resident of Vancouver, I am writing to you with regard to decisions about the interstate bridge replacement, and light rail.

This is a vital piece of transportation that will lead us into the future century. It must be built right with a long-term vision that includes multimodal mobility and reduced climate impacts.

I encourage you to support extension of IBR Light Rail to the Preferred Alternative terminus at **Library Square**. This would enable linkages to transit connections and provide light rail access to a larger populace. While the light rail must also connect with the multiuse path and waterfront, terminating it at the waterfront lacks true transportation connections and limits access for the community due to the distance and grade.

We have a unique opportunity to make our community stronger and more resilient into the future. This will provide individuals without cars or difficulty walking long distances with true connectivity and empowerment. It will help Vancouver reduce harmful particulate emissions and work towards meeting our climate goals. It makes good sense. Let's do it right!

Amy Horstman
Hough Neighborhood
Vancouver WA

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: Interstate Bridge Replacement
Date: Monday, April 13, 2026 10:40:11 AM

Testimony

Sarah Dollar | Executive Assistant to the City Council
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From: Lori Schmidt [REDACTED] >
Sent: Sunday, April 12, 2026 10:47 PM
To: City Council <council@cityofvancouver.us>; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Pluckhahn, Lon <lon.pluckhahn@cityofvancouver.us>
Subject: Interstate Bridge Replacement

You don't often get email from [REDACTED] [Learn why this is important](#)

Hello Mayor Ann, City Manager and Council,

As a longtime homeowner and resident of Vancouver, I am writing to you with regard to decisions about the interstate bridge replacement and light rail.

This is a vital piece of transportation that will lead us into the future. It must be built right with a long-term vision that includes multimodal mobility and reduced climate impacts.

I encourage you to support extension of IBR Light Rail to the Preferred Alternative terminus at Library Square. This would enable linkages to transit connections and provide light rail access to a larger populace. While the light rail must also connect with the multiuse path and waterfront, terminating it at the waterfront lacks true transportation connections and limits access for the community due to the distance and steeper grade.

We have a unique opportunity to make our community stronger and more resilient into the future. This will provide individuals without cars or difficulty walking long distances with true connectivity and empowerment. It will help Vancouver reduce harmful particulate emissions and work towards meeting our climate goals. It makes good sense. Let's do it right!

Lori Schmidt
Hough Neighborhood
Vancouver WA

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#)
Subject: FW: IBR light rail plan
Date: Monday, April 13, 2026 10:21:07 AM

testimony

Sarah Dollar | Executive Assistant to the City Council
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From: Eric Prileson [REDACTED] >
Sent: Saturday, April 11, 2026 10:59 AM
To: Pluckhahn, Lon <Lon.Pluckhahn@cityofvancouver.us>; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
Subject: IBR light rail plan

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi there,

This is related to the IBR and the multimodal and transit connections that are coming with it. I would like to voice my support and add some concerns with some of the proposed details of the plan:

1. I support extension of IBR Light Rail to the original Modified Locally Preferred Alternative terminus at Library Square
2. I want to see the multimodal connections of IBR strongly linked to the transit connections available at Library Square
3. Terminating either Light Rail or the Multi Use Path at the Waterfront is not a real solution to have multimodal connections between Portland and Vancouver
4. In the current plan, accessing Library Square from IBR by walking or biking would require descending 100 feet on a half-mile long spiral ramp, and then biking back uphill through downtown. This is known as "the Vancouver Dip"
5. Today's plan also does not connect transit with the Multi Use Path. This should be corrected.
6. I strongly request that a Light Rail connection from the Waterfront to Library Square also include the Multi Use Path

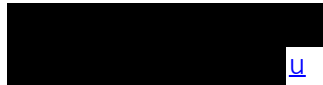
Thank you for your consideration and concern for the plan and the accessibility details that are critical for the plans success

Kind regards

Eric

Eric G. Prileson, MS

Pronouns: He/Him/His ([What is this?](#))



Washington State University - Vancouver

[Rudman Lab](#)

[Google Scholar](#)

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<https://www.martinevolutionaryecologylab.com/>

BLOG:

Science: <http://thenewparadigm.home.blog>

History: <http://understandhistorynow.wordpress.com>

History, Science, Reading, Writing, Sports, Outdoor Adventures!

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#); [Our Vancouver 2045](#)
Subject: FW: Feedback on proposed comprehensive plan for April 13
Date: Monday, April 13, 2026 10:39:55 AM

Testimony 4/13

Sarah Dollar | Executive Assistant to the City Council
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CITY OF VANCOUVER, WASHINGTON
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From: Ben McCarty <[REDACTED]>
Sent: Sunday, April 12, 2026 5:02 PM
To: City Council <council@cityofvancouver.us>
Subject: Feedback on proposed comprehensive plan for April 13

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Dear Members of the City Council ,

I am writing regarding the proposed Comprehensive Plan updates under the *Our Vancouver, Our Future 2045* process. I appreciate the significant effort that has gone into aligning the plan with state requirements and addressing the city's long-term housing needs. Like many residents across Vancouver, those of us in the Northwest Neighborhood recognize and support the need for increased housing supply and thoughtfully planned density.

My purpose in providing this feedback is not to oppose growth, but to encourage a more deliberate alignment between zoning policy, infrastructure capacity, and neighborhood-scaled outcomes—particularly as they relate to the proposed Medium Scale zoning with uncapped density.

The Northwest Neighborhood illustrates both the opportunity and the risk inherent in the current proposal. I live next to Franklin Elementary School, which hosts Vancouver Public Schools' Mandarin Language Immersion program. The long-term viability of schools like Franklin depends on incremental residential growth nearby. Additional housing—and additional residents—are not only welcome, but necessary.

However, the concern shared by many in our neighborhood is not whether density should increase, but *how* it should increase. The current Medium Scale zoning framework would allow six-story multifamily buildings of 24 units or more to replace existing single-family housing, without a defined upper limit on unit count. In an area where the transportation, utilities, and services network was never designed to accommodate that level of intensification, this creates a significant mismatch between land use policy and infrastructure reality.

Lincoln Avenue, the primary north-south corridor, remains a two-lane roadway with narrow bicycle lanes, limited shoulders, and long segments without sidewalks. 39th Street already experiences significant congestion and limited capacity peak hours. Bernie Drive and Washington St. are also primary routes out of the neighborhood, and both have constrained

sightlines, are narrow, and have significant safety concerns. Without clearly defined, funded, and timely transportation improvements, large-scale redevelopment risks exacerbating existing deficiencies rather than resolving them.

During outreach, residents have heard two assurances that appear to be in tension. On one hand, we are told that larger developments will generate the revenue necessary to fund infrastructure improvements. On the other hand, we are told that this type of development is unlikely to occur in our neighborhood at all. If significant redevelopment is indeed unlikely, then the rationale for applying Medium Scale zoning—and its associated impacts—becomes unclear. Conversely, if such redevelopment *is* expected, the lack of a concrete infrastructure phasing and financing strategy is concerning, particularly in cases where affordability provisions may defer or waive impact fees.

From a planning and equity perspective, uncapped density in Medium Scale zones may also produce unintended outcomes. Rather than encouraging incremental, homeowner- or small-developer-led infill, it strongly incentivizes large-scale acquisition by well-capitalized developers seeking to maximize unit yield to maximize return on investment. This dynamic can reduce opportunities for first-time homebuyers, shift housing stock toward a permanent rental class, and accelerate speculative pressure on adjacent single-family homes.

By contrast, the proposed Low Scale Neighborhood zoning already exceeds state minimum requirements while enabling meaningful “gentle density” through duplexes, fourplexes, and townhome development. This approach increases housing supply, supports neighborhood schools, and expands homeownership opportunities while integrating more seamlessly with existing infrastructure and neighborhood character.

More housing is needed. More equity is needed. More attainable pathways to homeownership are needed. My concern is that the current zoning approach, while well-intentioned, may undermine those goals through scale, speed, and consolidation rather than advance them through incremental, infrastructure-aware growth.

I respectfully urge you to consider broader application of Low Scale Neighborhood zoning—paired with targeted, funded infrastructure improvements—to better advance the Comprehensive Plan’s stated objectives while avoiding second-order impacts through Medium Scale zoning that may be difficult or costly to reverse.

Thank you for your time and your careful consideration of these issues.

Sincerely,

Ben McCarty

Vice President
Northwest Neighborhood Association

--

Ben McCarty
Vice President, Northwest Neighborhood Association

Cell: [REDACTED]

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#); [Our Vancouver 2045](#)
Subject: FW: Procedural and Infrastructural Defects in the 2045 Comprehensive Plan
Date: Monday, April 13, 2026 10:34:15 AM

4/13 testimony

Sarah Dollar | Executive Assistant to the City Council
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From: Joshua Jones [REDACTED] >
Sent: Saturday, April 11, 2026 2:10 PM
To: City Council <council@cityofvancouver.us>; [REDACTED]
[REDACTED]
Subject: Procedural and Infrastructural Defects in the 2045 Comprehensive Plan

You don't often get email from [REDACTED]. [Learn why this is important](#)

Councilmembers,

Though I hope to attend Tuesday's City Council Meeting, I am submitting this analysis of the Comprehensive Plan Draft for your review prior to the final drafting of the 2045 Comp Plan. After auditing the spatial application of the "Medium-Scale" (6-story) overlays against established urban planning principles, the city's state-mandated growth targets, and communications from City Staff, the current Comp Plan demonstrates legal, mathematical, and infrastructural inconsistencies that expose the city to unnecessary risk.

These flaws risk the validity of the current draft's compliance with the Growth Management Act (GMA) and the State Environmental Policy Act (SEPA), and should be addressed prior to the City's/Commission's final recommendation.

1. Procedural Risk: The Conflation of HB 1110 and Urban Mid-Rise Zoning (Medium Scale Density) The City's public engagement strategy has consistently framed the rezoning of our Low Density (R-6 and R-9) neighborhoods into 'Medium Scale Density' as a standard compliance measure with Washington State's HB 1110 "missing middle" housing initiative.

HB 1110 does mandate a transition away from single-lot exclusivity (allowing 4 to 6 units per lot), however it does not mandate the "Medium Scale Density" uncapped zoning of 6-story buildings in currently R6 and R9 areas. By removing maximum unit caps and providing for 6-story building envelopes, the allowable density jumps from the current 5-8 units per acre to 80 to 120 Units Per Acre. This is an up to 2,400% increase in allowable density.



City / Zoning Model	Previous Zoning Baseline (Min. Lot Size)	Max Height Limit	Theoretical Density	Practical Density	Magnitude of Density Increase
Austin, TX (HOME Initiative)	SF-3 (5,750 sq. ft.) ~5 to 6 DU/ac	2 to 3 Stories	~24 DU/ac	12 to 18 DU/ac	Up to 3x Density Increase
Portland, OR (RIP & RIP2)	R5 (5,000 sq. ft.) ~6 to 7 DU/ac	3 Stories (35' limit)	~42 DU/ac	15 to 25 DU/ac	Up to 4x Density Increase
Vancouver, WA (2045 Low-Scale)	R-6 / R-9 (5,000-7,500 sq. ft.) ~5 to 8 DU/ac	3 Stories	~35 DU/ac	15 to 20 DU/ac	Up to 4x Density Increase
Los Angeles, CA (TOC Tiers 3 & 4)	R1 (5,000 sq. ft.) ~6 to 7 DU/ac	5 to 6 Stories	150+ DU/ac	70 to 110 DU/ac	Up to 18x Density Increase
Seattle, WA (Urban Villages - MR)	SF 5000 (5,000 sq. ft.) ~6 to 7 DU/ac	6 to 8 Stories	200+ DU/ac	90 to 150 DU/ac	Up to 25x Density Increase
Vancouver, WA (2045 Medium-Scale)	R-6 / R-9 (5,000-7,500 sq. ft.) ~5 to 8 DU/ac	6 Stories	180+ DU/ac	80 to 120 DU/ac	Up to 24x Density Increase
Middle Housing					
High Density Midrise					

Framing a 24x density multiplier in 6-story mid-rise developments as standard "middle housing" is factually inaccurate, and the Comp Plan's decision to label this Zoning as "Medium Scale" is functionally misleading to the general public. In regional planning, a 6-story structure is universally classified as High-Density Urban Mid-Rise. Peer cities are transparent about this scale; Seattle explicitly zones these areas as "Midrise" and Portland labels them "High-Density". By cloaking high-density midrise construction behind the soft, approachable jargon of "Medium Scale," the Comp Plan is actively obscuring the physical reality of this zoning from its residents. This is a fundamental misrepresentation of the draft plan's physical scale, which compromises the legal mandate for "early and continuous public participation" (RCW 36.70A.140).

City staff have invoked comparisons to other Tier 1 cities under HB 1110 to justify the aggressive application of 75-foot tall, unlimited-unit zoning in current low density neighborhoods. Of the 16 Tier 1 cities in Washington, the vast majority cap their current low-density residential upzoning at 35 feet and 6 units. Tacoma caps at 45 feet. Spokane caps at 40 feet. Vancouver and Seattle stand entirely alone in pushing 6-story, unlimited-unit upzones into formerly low-density areas.

Tier 1 City	Max Units Per Lot	Max Height Limit
Auburn	6 units	35 ft (3 stories)
Bellevue	6 units	35 ft (3 stories)

Bellingham	6 units	35 ft (3 stories)
Everett	6 units	35 ft (3 stories)
Federal Way	6 units	35 ft (3 stories)
Kennewick	6 units	35 ft (3 stories)
Kent	6 units	35 ft (3 stories)
Kirkland	6 units	~35 ft (3 stories)
Pasco	6 units	35 ft (3 stories)
Renton	6 units	35 ft (3 stories)
Spokane	Unlimited	40 ft (3 to 4 stories)
Spokane Valley	6 units	35 ft (3 stories)
Tacoma	Up to 16 units (UR-3 bonus zone)	45 ft (4 to 5 stories)
Yakima	6 units	35 ft (3 stories)
Seattle (Neighborhood Centers)	Unlimited (Regulated by FAR)	50 to 65 ft (5 to 6 stories)
Vancouver (Medium-Scale Zone)	Unlimited	75 ft (approx. 6 stories)

2. The Spatial Misapplication of Transit-Oriented Development Even when compared to Seattle, the Comp Plan’s application of ‘Medium Scale Density’ is fundamentally flawed. Seattle strictly limits this massive upzoning to an 800-foot radius around Major Transit Stops such as BRT, Light Rail, and Commuter Trains. If a neighborhood only has an hourly bus, Seattle does not apply this zoning. Vancouver’s Comp Plan is proposing Medium-Scale zoning for neighborhoods where there are no arterial roadways, thoroughfares, or mass transit, where the local bus runs only once an hour, stops before 7:00 PM, and does not run on weekends. Even under Seattle’s urban center rules, our neighborhoods would never qualify for this upzoning.

Urban planning principles dictate that density is allocated to areas with existing high-capacity transit, robust roadway infrastructure, proximity to employment opportunities, and commercial viability for lot assembly. The proposed "Medium-Scale" map in Vancouver’s Comp Plan inversely correlates with these principles.

The Comp Plan blankets established residential neighborhoods (such as Hough, Shumway, Carter Park, Northwest, and Lincoln) with ‘Medium-Scale’ zoning. These neighborhoods feature narrow local access streets, zero BRT infrastructure, and highly cost-prohibitive assembly economics.

Conversely, neighborhoods that actually possess robust transit oriented development profiles such as direct BRT access and immediate thoroughfare and freeway access, closer proximity to commercial hubs for employment, and are already experiencing the revitalization associated with favorable assembly economics like Rose Village or Fruit Valley remain largely unaffected by this new 6-story zoning. This arbitrary spatial application contradicts the foundational infrastructure requirements necessary to support mid-rise density.

3. The Absence of Mandated Subarea Plans By applying ‘Medium-Scale’ zoning to R6 and R9 neighborhoods, the city is bypassing critical scrutiny. Under the city’s own urban planning standards, high-density districts require the localized infrastructural mitigation of a dedicated Subarea Plan.

A 6-story, 80-unit apartment building requires specific traffic mitigation, fire apparatus

access, and utility load planning that simply does not exist on narrow local access roads. By applying this zoning globally through the Comprehensive Plan rather than through localized Subarea Plans, the city is effectively evading its obligations under SEPA. This failure to transparently disclose and locally mitigate these severe infrastructural impacts violates state law and exposes the entire zoning map to invalidation by the Growth Management Hearings Board.

4. The Mathematical Fallacy of the Growth Mandate City staff have consistently cited the Clark County 2025-2045 Comprehensive Growth Management Plan update, which assigns Vancouver a growth allocation of roughly 38,000 new housing units, as the primary justification for the proposed zoning changes. However, the city's own data proves the 6-story map is entirely unnecessary to meet this mandate.

According to Table 2 of the Comp Plan, the city only expects to yield 15,800 units across 6,300 acres of Medium-Scale zoning over the next 20 years. That is an average of 2.5 new units per acre.

The proposed "Low-Scale" zoning allows 4 to 6 units per lot (yielding roughly 15 to 20 units per acre). Therefore, applying "Low-Scale" zoning across the board mathematically absorbs the entire 2.5 unit/acre forecast while actually fitting the infrastructure of our streets. Because the baseline Low-Scale zoning across the city satisfies our statutory growth obligations, the application of "Medium-Scale" on current R6 and R9 neighborhoods provides no statutory benefit, it merely legalizes an infrastructural crisis..

Conclusion

The data clearly demonstrates that 6-story Medium-Scale zoning is mathematically unnecessary to fulfill Vancouver's GMA housing targets, incompatible with our residential infrastructure, and procedurally flawed in its public presentation. Public participation cannot be considered legally meaningful if the broad dissemination of the proposal is fundamentally misleading regarding the physical scale of the changes and the purpose behind the changes. This misrepresentation effectively nullifies the public's right to accurately comment during the State Environmental Policy Act (SEPA - RCW 43.21C) review process.

I urge the City Council to direct Community Development staff to remove the "Medium-Scale" reclassification of our R-6 and R-9 neighborhoods from the final draft of the Comp Plan prior to the June vote. Vancouver should fully embrace Low-Scale Density "Middle Housing" to comply with HB 1110 and equitably absorb our required regional growth, and abandon the destructive push for High-Density Midrises in our neighborhoods.

Thank you,
Joshua Jones

From: [Dollar, Sarah](#)
To: [Dollar, Sarah](#); [Our Vancouver 2045](#)
Subject: FW: Comments on Comprehensive Plan Update
Date: Monday, April 13, 2026 11:17:18 AM
Attachments: [Comments on the Update to the City Comprehensive Land.docx](#)

4/13 Testimony

Sarah Dollar | Executive Assistant to the City Council
Pronouns: She/Her/Hers
CITY OF VANCOUVER, WASHINGTON
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From: Tom Knappenberger <[REDACTED]>
Sent: Monday, April 13, 2026 11:08 AM
To: City Council <council@cityofvancouver.us>
Cc: Tom Knappenberger <[REDACTED]>
Subject: Comments on Comprehensive Plan Update

You don't often get email from [REDACTED]. [Learn why this is important](#)

Please accept the following comments on the city's proposed draft update to its Comprehensive Plan.

Thank you.

Tom Knappenberger
[REDACTED]
Vancouver, WA 98665
[REDACTED]

Comments on the City Comprehensive Plan and Zoning Code Update

April 13, 2026

Vancouver City Councilors:

Slow it down; tone it down.

Thank you for the opportunity to comment on this important and potentially life-changing Comprehensive Plan Update. A few over-arching points for you to consider:

1. Please delay adoption of the update in order to give your constituents time to understand it and comment. While city planners have been engaged for three years, the zoning map that will designate lot sizes, building heights and other increased density issues, has been public only since Feb. 19, just over seven weeks ago. An updated version of 292 pages was released just late Friday.

The plan's complexity and scope require time to absorb and understand. Few people I've spoken with are aware of this process or what it might mean for their neighborhoods. I helped organize a special meeting of our Northwest Neighborhood Association on March 19. Few of the 40 attending in this engaged neighborhood were knowledgeable about the plan; some were completely unaware. Meanwhile, only 33 people commented between Feb. 19 and March 31 on a city on-line form.

Fears that the city will lose state grant funding appear overstated, and are not a good reason to rush through such momentous changes.

2. Why is the city requiring more density than is required by the population estimates given it by the state and county? Meeting the increased density of the county-provided population forecast -- adding more people, cars, need for parking and demands on infrastructure -- will be difficult enough.

3. The city should cooperate closely with the county in designing density for the city's urban growth area. There are nearly as many people - 171,000 - in the UGA as there are in the City of Vancouver - 202,000. It makes no sense to require increased density in the city without concomitant density in areas expected to be a part of the city.

4. The draft plan speaks at length to creating a positive "community experience: for all residents. Please consider ways to mitigate the impact of increased population and density in existing neighborhoods for long-time citizens as well as newcomers.

Thank you.

Tom Knappenberger

[REDACTED]

Vancouver, WA 98665