



June 14, 2023

RE: City of Vancouver comments in support of proposed housing text amendments related to middle housing and smaller homes for June 15 public hearing

Chair Johnson and Clark County Planning Commissioners:

Thank you for the opportunity to comment on behalf of the City of Vancouver. With a couple of exceptions, we strongly support the recommendations before you and believe they are a sound first step in providing increased opportunities for middle housing and smaller homes in the Vancouver Urban Growth Area (VUGA). We appreciate the focus on the VUGA, and the thorough work by County staff and the project team in developing the original Housing Options Study and Action Plan (HOSAP) recommendations adopted by the County Council last year, and again this year with the implementing policy and code language now before you.

As acknowledged in the County staff report for this hearing, however, since this work began major new Growth Management Act (GMA) housing requirements have been enacted by the legislature. One of the new bills, HB 1220, requires not just planning for more housing in the abstract, but demonstrating through a land capacity analysis that a specific number of housing units determined by the state can be accommodated locally. Clark County's obligation based on its recently selected long term countywide population forecast is to accommodate approximately 115,000 total new units, roughly half of these affordable at 80% of Area Median Income (AMI) and a third affordable at 50% AMI.

The local process of allocating this countywide total to individual jurisdictions has not yet occurred, but unless the accuracy of countywide capacity modeling via the Vacant and Buildable Lands Model (VBLM) is significantly improved to recognize cities' actual growth capacities, the overwhelming majority of this obligation - over 90,000 new units, half below market - will need to be accommodated in the VUGA and other currently unincorporated areas.¹ Vancouver and other cities are working to determine how to comply with our likely share of the new requirements of HB 1220 as well as other major new GMA housing requirements unique to cities. Overdue improvements to the accuracy of the VBLM could appropriately shift more of the HB 1220 burden to local cities, but significant upzoning of properties will still likely be needed in all jurisdictions, including the VUGA.

We believe these bigger picture GMA housing requirements should be kept in mind as the text changes are being considered. The more aggressive the text changes are in increasing the capacity for new housing, particularly smaller and lower cost housing, the less extensive the zoning map changes will need to be.

¹ The 2022 Clark County Buildable Lands Report [Data Results and Maps](#) estimate, inaccurately in our view, that the cities collective long term capacity is only approximately additional 23,200 housing units

Our specific comments are as follows:

- Proposed allowances for duplexes, triplexes and quadplexes in most single-family zones within allowed density ranges are important in helping jurisdictions to meet the new GMA requirements in the VUGA, and are not unique to it. Cities of 30,000 or higher population are now effectively required to allow up to four units and in some cases six in all single-family zones. To ensure that VUGA triplexes and quadplexes that are built fit in with their surroundings and maintain a safe and walkable street front, we support the draft requirements of proposed CCC Chapter 40.260 for main entrances to be visible from the front, and to limit garage widths to 20 feet or half the front façade.
- We similarly support proposed new Compact Lot Development requirements to require a front facing entrance and limit garage widths to 10 feet or half the front façade, whichever is greater, as necessary tools to ensure that developments using this optional compact single family development option has an appropriate street function and interface. Homebuyers wanting wider garages or side entrances could still do so through new construction in any zone not using the Compact Lot Development option, or through purchase of an existing home in any zone. Vancouver has similar garage and entrance requirement for any new housing in the R-6, R-9 and R-17 zones.
- Even though they will likely be developed with smaller homes, both the Compact and Narrow Lot development options appear to have the same base parking requirement of 2 off-street spaces per unit as conventional and typically larger single-family homes. Modest reductions in minimum parking requirements should be considered for these smaller developments as they will likely be occupied by modestly smaller households with somewhat lesser parking needs.

We want to reiterate our appreciation for staff and the project teams' work on these changes, as well as the need to consider more aggressive changes in the future to address state housing capacity requirements.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Chad Eiken". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chad Eiken, AICP, Director
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