

From: [Oliver Orjiako](#)
To: [Rebecca Messinger](#)
Cc: [Sonja Wisler](#)
Subject: FW: 2023 VBLM draft
Date: Tuesday, August 29, 2023 8:14:22 AM
Attachments: [image001.png](#)
[NWPPartners_VBLM_briefing FINAL 8 28.pptx](#)

Good morning Rebecca:

Please, the attached can be posted as public comment for the Wednesday Council work session.
Thanks.

Oliver

From: Noelle Lovern <Noelle@biaofclarkcounty.org>
Sent: Monday, August 28, 2023 4:32 PM
To: Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Cc: ga@ccrealtors.com; jbaker@credc.org
Subject: 2023 VBLM draft

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Good afternoon, Council and staff.

In advance of the upcoming work session slated for August 30, NW Partners for a Stronger Community's Comprehensive Plan Taskforce, which includes representation from several private sector organizations including CCAR, CREDC, and the BIA, reviewed and analyzed the 2023 VBLM draft. The attached presentation represents the Taskforce's insights, comments, and inquiries regarding the 2023 VBLM draft.

The presentation does not provide conclusions but offers considerations for furthering this important conversation as this model will shape Clark County for the next 20 years through 2045. We are available to answer any questions you might have regarding this presentation at your convenience.

Thank you for your time in advance.

Best,

Noelle Lovern | Government Affairs Director
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Protecting and promoting the building industry.

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NW PARTNERS
For a Stronger Community

Comp Plan 2025 Taskforce

VBLM Briefing



Topics

- Background and overview of VBLM 2021
- VBLM Residential Yield snapshot
- Refining assumptions
- Clarifying critical areas conversion rates
- Lands for jobs scarcity
- Density creating a new Clark County identity
- Questions for VBLM Draft refinement



The Role of VBLM in the Comprehensive Plan Update

- The Vacant Buildable Lands Model (VBLM) is a modeling tool:
 - For evaluating urban area alternatives during Comprehensive Growth Management Plan updates
 - For monitoring growth patterns during interim periods.
 - For analyzing potential residential and employment capacity of each UGA based on vacant and underutilized land classifications
 - For determining the amount of urban land needed to accommodate projected population and job growth for the next 20 years
 - For analyzing land consumption or conversion rates on an annual basis



Vacant Buildable Lands Model (VBLM) vs. Buildable Lands Report (BLR)

VBLM- the model for tracking land conversion/consumption, growth patterns, and the availability of developable land.

BLR- the report that is required by GMA to convey:

- 1) If residential development in the UGA is meeting the densities set in the comprehensive plan

- 2) If there is adequate land supply in the urban growth areas to accommodate the population growth on a 20-year planning horizon



What happened with the 2021 BLR?

- Consultants ECONorthwest & AHBL assisted with updates to the methodology
- Council appointed the Buildable Lands Project Advisory Committee (BLPAC) which met 8 times between Dec. 2019-Jan. 2021.
- BLPAC provided recommendations to the Council re: updates to VBLM assumptions.
- One major recommendation from BLPAC was regarding the use of Achieved Density vs. Target Density.
 - The BLPAC was split on whether to use achieved density in the VBLM; however, the County is required to consider achieved densities, whether they are used in the VBLM or not.
 - BLPAC had concerns regarding using achieved density (actual density since the last evaluation) without consulting the jurisdictions to refine the data by removing outliers and anomalies.
 - Ultimately, Council approved the BLR using Achieved Density.



Findings from BLR 2021

- From 2016 to 2020, there were 21,121 housing units developed in urbanized Clark County
- 60% of urban Clark County residential development from 2016 to 2020 was single-family housing units
- All cities and the Vancouver met their residential density targets
- The population growth rate in Clark County since 2015 **exceeded the rate assumed** by the 2015-2035 Comprehensive Plan, thereby increasing potential need for employment lands
- There are **6,720 net buildable acres** in Clark County urbanized areas that can accommodate the remaining population through the **2035** planning horizon



Snapshot-Land Use Capacity

Net Buildable Acreage 2021	Net Buildable Acreage 2023	Acres Converted from 2021-2023
6,720	6,041	679

VBLM Land Use by Population Capacity	
Adopted Population Forecast for 2025-2045	718,154
Current Clark County Population	527,400
Added People through 2045	190,754
VBLM Land Use by Population Capacity	105,883
Number of People NOT Accommodated in the 2023 Draft (Delta between Forecast/Current Population)	84,871

Snapshot-Housing Units Need

20-year Housing Unit Need in Clark County by Income Brackets	
Total Housing Need	103,475 units
0-30% AMI Non-Permanent Supportive Housing	12,030 units
0-30% AMI Permanent Supportive Housing	7,393 units
30-50% AMI	16,188 units
50-80% AMI	15,661 units
80-100% AMI	9,011 units
100-120% AMI	8,534 units
120%+	34,658 units
Emergency Housing	3,821 units

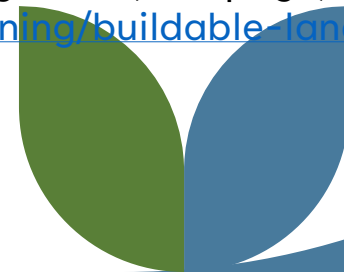
VBLM & the 2025 Comprehensive Plan Update

- How could 2023 VBLM draft assumptions/projections fall short in accurately planning for the projected 718k population and 269k jobs needed by 2045?
 - Critical areas conversion is overestimated.
 - Critical areas conversion rates are declining due to new and developing legislation and ordinances governing buffers and other criteria.
 - There is simply not enough buildable acres in the current VBLM to accommodate larger employers and their workforce.
 - A healthy workforce ecosystem must have adequate land for jobs, affordable housing, and safe infrastructure.
 - Density is creating its own identity and culture.
 - Clark County is currently the second most dense county in Washington with density doubling every 30 years.



Planning Assumptions for Improved Accuracy-VBLM

- Based on the real-world experience in the development community, there should be modifications to these assumptions to produce the most accurate model:
 1. Critical areas deductions (% of critical lands that will not convert)
 2. Target density vs. achieved density
 3. Infrastructure deductions
- The VBLM assumes 50% of critical areas will convert for residential development. This is an unrealistic assumption which will result in an overestimation of developable land and ultimately a shortage of acreage to accommodate the projected growth.
 - The planning assumptions that impact the VBLM can be found on page 133 (PDF page) of the current Buildable Lands Report: <https://clark.wa.gov/community-planning/buildable-lands-report>



Preserving Critical Areas

Critical areas ordinances preserve the natural environment, wildlife habitats, and sources of fresh drinking water:

- Wetlands inventory (NWI, high quality, permitted, modeled) with 100-foot buffer
- Habitat areas with 100-foot buffer
- Species areas with 300-foot buffer
- Riparian stream buffers by stream type
- Designated shorelines
- White oak mitigation

Critical areas regulation address public safety by limiting development in areas prone to natural hazards like floods and landslides.

- 100-year floodplain or flood fringe
- Slopes greater than 15 percent (>25% for City of Vancouver)
- Land slide area that has active or historically unstable slopes
- Hydric soils with 50-foot buffer

****At what rate are critical areas actually converting?**



Overestimating Critical Areas Conversion is Costly

- Developers have two general options when encountering critical areas:
 1. Avoid developing on or around critical areas – which means these critical areas will not convert
 2. Develop critical areas and mitigate (wetland mitigation bank, transfers, buffer averaging, etc.) –which is costly and often makes a project not economically viable
- Using flawed assumptions for converting critical areas will result in an overestimation of buildable land in Clark County and lead to shortages when accommodating future growth.
 - Staff contacts: Jenna Kay- jenna.kay@clark.wa.gov Brent Davis- Brent.Davis@clark.wa.gov



Critical Areas Assumptions Must Account for these Ordinances

- Requirements continue to increase, decreasing the conversion rate of critical areas
- On March 7, 2023 the Clark County Council voted to adopt its updated [critical areas ordinance](#) in accordance with DOE & the State
 - Industry experts: Francis Naglich: Francis@eco-land.com Kurt Stonex: kstonex@mackaysposito.com



Critical Areas Conversion Rate Case Study

- Goals of the study:
 1. Discover what percentage of critical areas on average truly convert (direct wetland impacts & buffer reductions)
 2. What is the average discrepancy between mapped critical areas and what is found in the field
- Scope of study: 9 total projects, 3 from each of the following jurisdictions:
 1. Vancouver/UGA
 2. Battle Ground/UGA
 3. Camas/UGA
- Preliminary findings show that the actual conversion rate for critical areas is much less than 50% assumed in the 2023 VBLM Draft
 - In many cases the actual conversion rate is only 20%
 - NW Partners is developing a final report well ahead of the VBLM Planning Assumptions Public Hearing

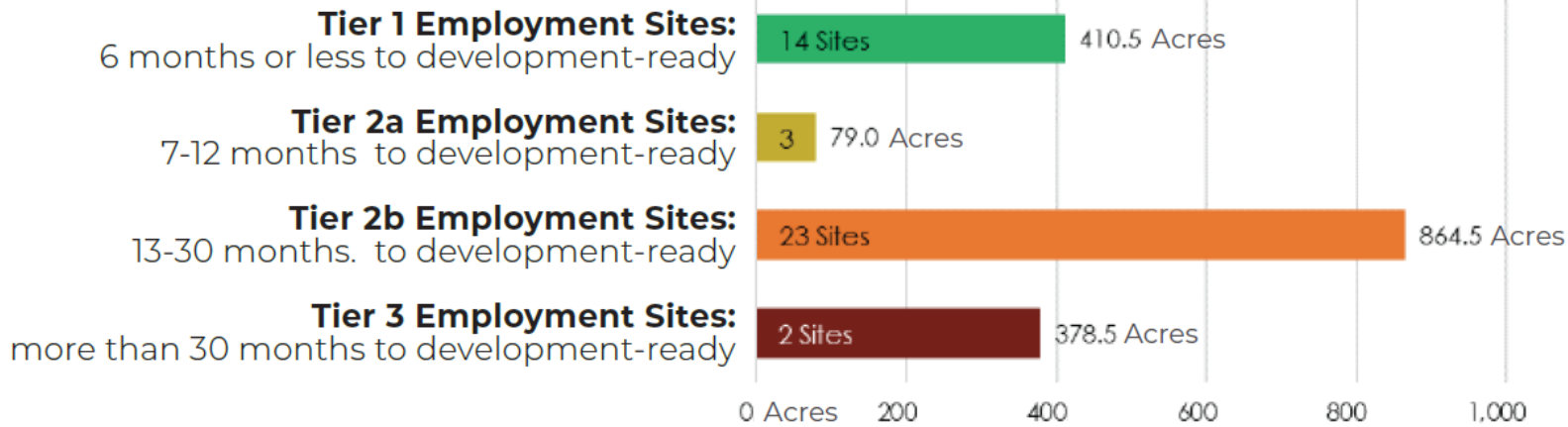


[Data Now Overtaken By Events]
CREDC Snapshot of Prior (2019)
Employment Lands Study Findings

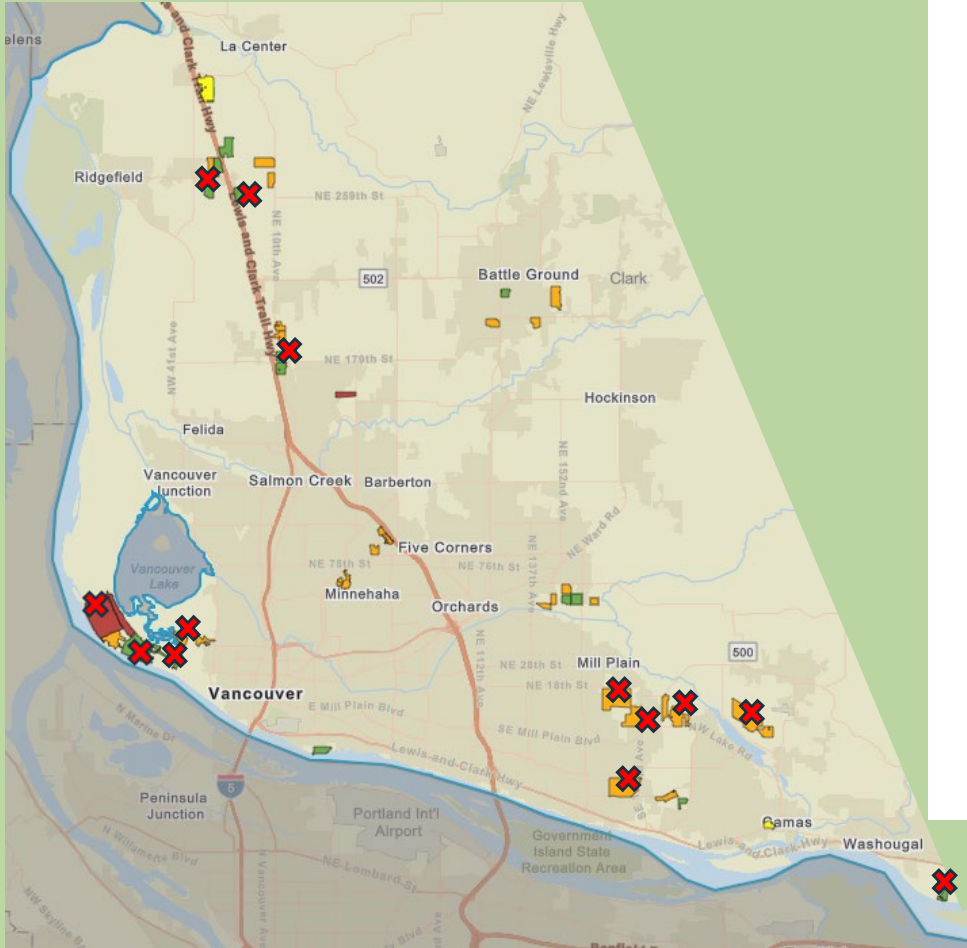
Inventory Findings

A total of ~~42~~ **42 sites** greater than 20 acres are potential large employment sites in Clark County. Together they total approximately ~~3,250~~ **3,250 gross acres** in Clark County's cities and unincorporated Urban Growth Area (UGA) boundaries.

Distribution by Tier & Gross Acreage



VBLM Ineffectiveness

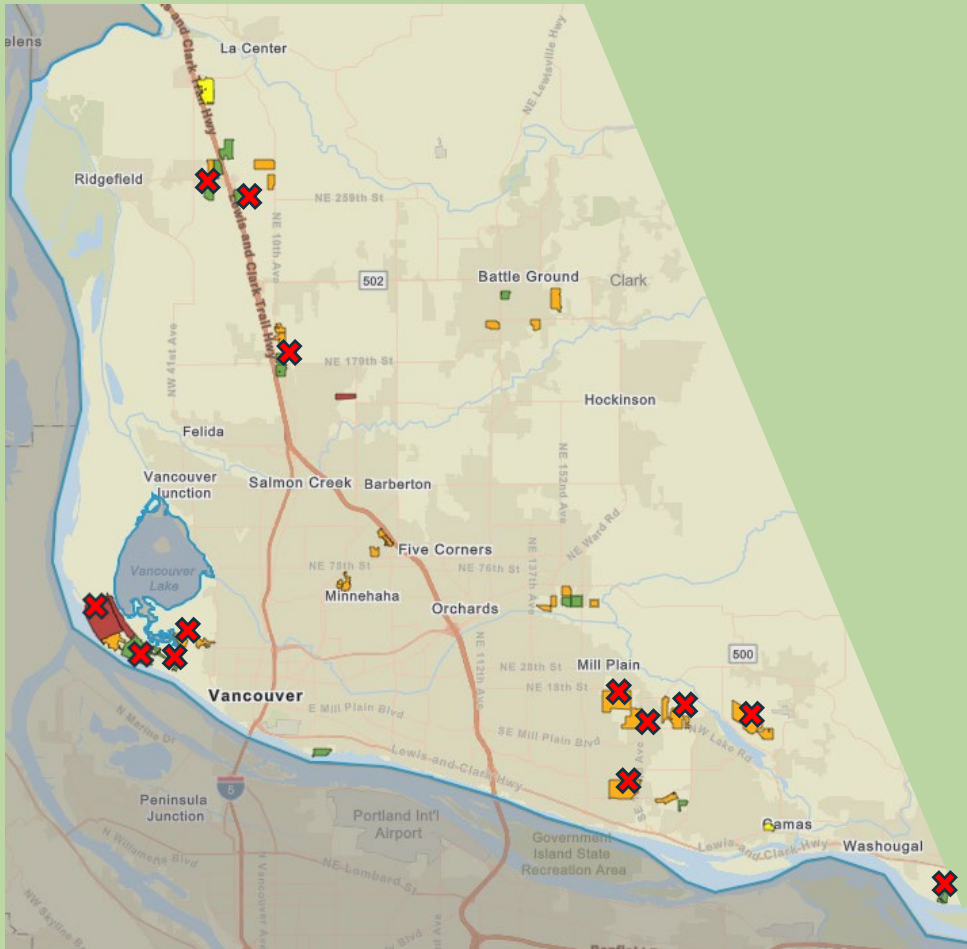


- An employer seeking a site with 5-20 acres or greater cannot be served by the VBLM’s inventory of disparately located fractional acreage offerings – the “net buildable” aspect of the model fails industrial use cases as the inventory diminishes; a multitude of tiny, unusable parcels remain unconverted and clog up the model more and more each GMA cycle

< Visual represents a top-of-mind notation of sites where development activity (not necessarily industrial) is occurring on employment land and also areas where significant encumbrance persists

VBLM Ineffectiveness (Industrial Lands)

Proposed Solution →



- Collaborate with CREDC on an application to the Economic Development Administration for Planning and Local Technical Assistance grant money: \$50k local match + \$50k grant
- CREDC to commission a feasibility study identifying 3-5 larger acreage “industrial park” sites, and establish objective prioritization factors. Goal: Realize viable sites into which new/growing industrial employers can be clustered and co-located
- This visionary concept stands to create efficiencies for aggregated parcel holdings (utilities/business formation/industrial land preservation, for industry use)

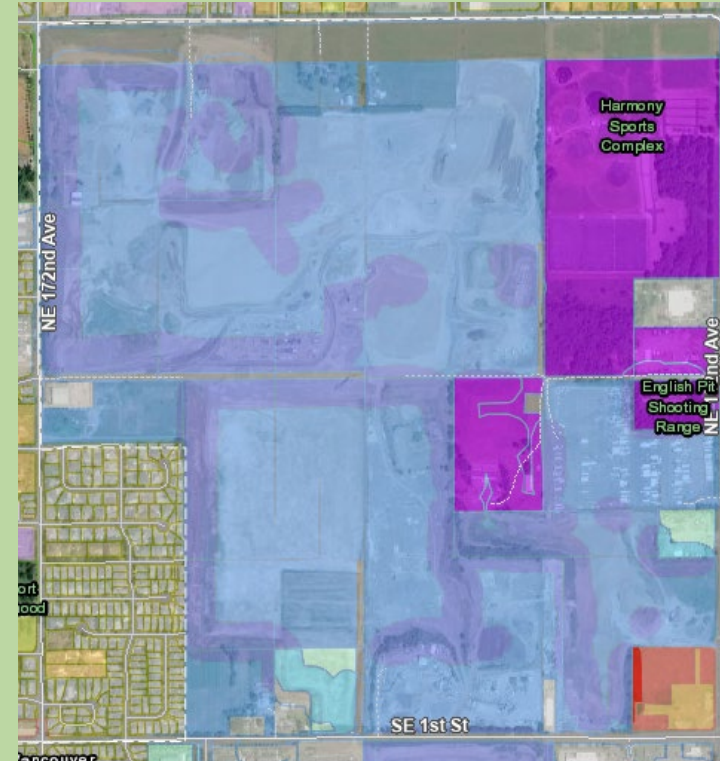
VBLM Inaccuracy

CREDC presented to Council three case studies (April 2022) that demonstrate VBLM inaccuracies staving off industrial developments

- Critical area conversion factor on the ground will realize at far less than the 50 percent critical industrial ratio proposed in the model --quite possibly at well under 25 percent conversion. (Dictated by market AND new WA state ecology regulations)

Solution: Right size the critical industrial areas conversion ratio to a realistic threshold. Reference ground-truthed data to establish new conversion rate for the VBLM.

**Consequence of status quo model =
no viable industrial lands for jobs into the future**



Economic Development FRDU & Comp. Plan Update

- CREDC has struggled to identify large parcels with ample services for prospective employers.
- The FRDU code may spur increased economic development
 - By offering access to large parcels of light industrial and commercial land
 - By attracting prospective employers who actively looking for land
- Presentation: https://clark.wa.gov/sites/default/files/media/document/2023-08/080923_WS_Railroad%20Advisory%20Board%20Freight%20Rail_0.pdf



OFM Density Data for Clark County

We are squished!

- Cramming more people into smaller homes spaced closer together with no yards or driveways and fewer critical areas to escape to is not the only option.
- Strategic expansion of the UGA can be carefully thought out and proactive if accurate assumptions are used.
- Clark County is the second most dense county in Washington. How much more density can we expect without altering the landscape, people, and culture?

Clark County Land Area- Sq Miles				
Year	1990	2000	2010	2020
Land Area	627.9	628.2	629.0	628.5
People/sq mile	379.13	549.55	676.25	800.82

**2023 People/sq mile = 839.15

Density is Doubling Every 30-Years Jeopardizing Clark County's Culture

- Density is creating its own identity
- Density changes the landscape as well as the people
 - Increase in public safety concerns
- Density is associated with higher rates of most mental health problems compared to rural areas:
 - 40% higher risk of depression
 - Over 20% more anxiety
 - Double the risk of schizophrenia
 - [Report](#)



Solutions to consider

- Reconfigure the Vacant Buildable Lands Model based on Target Density
- Factor in updated and real-world estimates of actual critical areas conversion rates
- Develop a map that indicates how the 2025-2045 forecasted population and projected jobs can be accommodated
- Explore strategic expansion of Urban Growth Areas:
 - For larger land parcels to attract major job creators
 - Due to the lower actual conversion rate of critical areas
 - To preserve community stability and strength
 - Retain fee simple homeownership options which attracts large employers



Exploration Questions

- How will the 2025 comprehensive plan address housing for the nearly 85k people that are not accommodated in the 2023 VBLM Draft?
- Will increasing density alone make up for the shortfall?
- How much density increase would be needed to accommodate the additional 85k people within the current UGA?
- Is there a way to strategically expand the UGA to continue the protection of critical areas?
- How does the 2023 VBLM Draft address HB1220 as to the impact it will have Clark County's future land use in the context of the comprehensive plan, especially housing and jobs?



Exploration Questions

- Is all publicly owned land excluded from the VBLM? Should deductions for schools and parks be introduced?
- What will happen to the tax base (amount and balance of revenue streams) if new and existing employers do not have space to realize productive business activity?
- Could FRDU be a solution to add more jobs and jobs land in Clark County, while increasing efficiency and decreasing VMT?
- Could an area or countywide AG study be conducted to identify what is “commercially viable” AG land under GMA?
- As the second most dense county in Washington, what level of density will be sustainable for Clark County?
- What is the vision for how Clark County will develop over the next 20-years?



“ We are squished.

Betty Sue Morris

”

Thank you