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**Subject:** NW Partners VBLM Assumptions- Public Comment  
**Date:** Friday, October 13, 2023 2:32:42 PM  
**Attachments:** [image001.png](#)  
[VBLM Assumptions Packet to CC PC FINAL.pdf](#)

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Greetings, Chair Bowerman, County Councilors, Planning Commissioners, and County Manager.

NW Partners Comprehensive Plan Taskforce is submitting the attached memo with exhibits A-C as a public comment for the record in the matter of the VBLM assumptions. We have included our response to City of Vancouver's letter dated Sept. 18, 2023, and a technical addendum that supports our recommendations for modifications in the proposed VBLM assumptions.

In summary, we urge refinements, modifications, and verification of outputs of the VBLM before moving to approve. Our documentation details gaps, inaccuracies, and needed integrations to comply with HB 1220 which has not yet been accounted for in the VBLM.

We are available to discuss our position and these documents at your convenience.

Thank you for your time and leadership.

**Noelle Lovern | Government Affairs Director**  
**BIA of Clark County - a Top 30 NAHB Association**  
*Protecting and promoting the building industry.*

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## Memorandum

**To:** Clark County Council  
**CC:** Clark County Planning Commission  
**From:** NW Partners for a Stronger Community  
**Date:** October 12, 2023  
**Subject:** VBLM Assumptions

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The NW Partners Comprehensive Plan Taskforce has reviewed the proposed assumptions associated with the Vacant Buildable Lands Model. We find these assumptions to be incomplete. Our Taskforce urges major modifications to the Vacant Buildable Lands Model before moving forward with approval.

We as a business coalition are in agreement with the City of Vancouver that the VBLM is not functioning properly. That being said, there are items in Vancouver's letter dated September 18 that we conceptually disagree with. Further, we agree Clark County has certainly not adequately demonstrated the accuracy of VBLM outputs (see exhibit A: Vancouver letter dated Sept.18). You will note that we have identified, with particularity, information Vancouver has yet to provide or at least made public in a letter addressed to the City of Vancouver (see exhibit B).

Clark County must demonstrate that the VBLM is complete and accurate before any decision to approve is made. NW Partners Comprehensive Plan Taskforce has compiled some recommendations regarding the assumptions which include:

### Recommendation for Critical Areas Assumptions

Based on the current regulatory environment and its inevitable increase in restriction, NW Partners recommends a critical areas never to convert factor of 85%.

### Recommendations for Parks Assumptions

NW Partners recommends a set-aside for parks of 12.8%.

NW Partners urges Clark County to adjust the VBLM to reflect a deduction to account for undevelopable park land.

### Recommendation for Schools Assumptions

NW Partners recommends that VBLM assumptions be adjusted to reflect a set-aside for schools at 7.9%.

### Recommendation for urban and rural split assumption

NW Partners recommends an urban/rural split of 95/5.

\*\*Please note that these recommendations and supporting data are detailed in a technical addendum attached to this letter (see exhibit C).

It is important to note that every Comprehensive Growth Management Plan adopted by Clark County has been appealed by various groups on behalf of businesses, developers, and the environmental community. It is reasonable to assume that this one will be appealed as well. For this reason, every effort must be made to ensure a defensible outcome. The key to a defensible GMA comprehensive plan is found in the detail provided in the record.

Our community relies on accurate and complete information and assumptions in its plan should someone appeal. We strongly believe that the model cannot be approved until the assumptions are honed, all new legislation that impacts the model is addressed/integrated into the model and outputs are verified.

Approving the model now will only become a checked box and will certainly need to be revisited before final approval of the 2025 Comprehensive Plan Update. The legal exposure in approving an incomplete model is costly and may ultimately delay implementation of the plan by a year or two. We must DO the work, SHOW the work, and allow stakeholders to weigh in before the VBLM can be approved.

Thank you for considering these comments.

NW Partners for a Stronger Community  
Attachments



## Memorandum

**To:** Vancouver City Council & City Staff  
**From:** NW Partners for a Stronger Community  
**Date:** October 12, 2023  
**Subject:** Response to September 18 Letter to Clark County Board of County Councilors

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The NW Partners Comprehensive Plan Taskforce has reviewed a letter dated September 18, 2023, from Vancouver City Councilor Eric Paulsen which was delivered to the Clark County Board of County Councilors. The letter in general, misstates and/or ignores how the State of Washington's Growth Management Act functions in a few respects and reflects a lack of detail in the assertions made on behalf of the City of Vancouver.

Although we as a business coalition are in agreement that the VBLM is not functioning properly, there are items in your letter that we conceptually disagree with. Further, we agree Clark County has certainly not adequately demonstrated the accuracy of VBLM outputs. We agree with you that Clark County must demonstrate that the model is complete and accurate before any decision to approve the current VBLM is made.

It is important to note that every Comprehensive Growth Management Plan adopted by Clark County has been appealed by various groups on behalf of businesses, developers, and the environmental community. It is reasonable to assume that this one will be appealed as well. For this reason, every effort must be made to ensure a defensible outcome. The key to a defensible GMA comprehensive plan is found in the detail provided in the record.

The September 18 letter to Clark County contains bold assertions about Vancouver's capacity and ability to handle its growth within the land available to it today. That may or may not be true. It is impossible to verify assertions made in the letter as the City has NOT SHOWN ITS WORK to support these positions.

It occurs to this Taskforce that Vancouver may intend to convert commercial lands (which may be commercial or industrial) for housing without disclosing to stakeholders or the County how the City will convert commercial lands to residential and still accommodate the jobs necessary to meet the required jobs to housing balance.

NW Partners Comprehensive Plan Taskforce urges the City of Vancouver to verify its assertions in the September 18 letter by answering/producing the following:

**Assertion #1-** “Some of the adopted assumptions are contrary to state guidance, or based on data from single family housing only, which does not accurately represent all development.”

Q: What specific assumptions are contrary to state guidance?

**Assertion #2-** “Basic data suggests the VBLM is grossly undercounting residential capacity by a wide margin. The VBLM reported last month that there was capacity for just 5,197 more housing units in the City of Vancouver, at a time when developers have land use applications under review in the City for well over 12,000 single and multi-family units.”

Q: Please provide a map, record of applications, and calculations that document the proposed placement of the 12,000 housing units.

**Assertion #3-** “On its face, it’s clear that the model under-estimates the residential growth that Vancouver can accommodate.”

Q: Please show your work. How and where will Vancouver accommodate the coming growth? What exactly is the plan in detail?

**Assertion #4-** “VBLM results show that there are currently 1,380 existing housing units in various non-residential zones in the VUGA and another 3,200 similar units in the small cities, yet the model assumes no housing units at all will be built in these zones in the next 20 years. Housing development on non-residential land would be likely to increase in the future, not come to a screeching halt.”

Q: If non-residential land will convert, how can this assumption be integrated into the model and assurances put in place to avoid shadow inventory that will not be developed?

**Assertion #5-** “Unless there are significant zoning changes, countywide UGA expansions totaling somewhere around 25 square miles for housing, not counting additional employment land expansions, will be needed.”

Q: Please provide a detailed plan of the zone changes that would have to occur to avoid UGA expansions.

**Assertion #6-** “The current model was developed for the 2022 Buildable Lands Report which was not appealed, but BLR reports are required by GMA to simply determine whether there is or is not sufficient land to meet remaining growth targets of previously adopted plans.”

Q: According to GMA and Vancouver’s understanding, when is the proper time within the law for an appeal?

If this information is being provide by the City to County staff outside of normal, public channels, staff may be putting Clark County in violation of the enhanced public participation requirements for this planning process. Each city within Clark County should weigh heavily the responsibility to adhere to the public participation plan and acknowledge the risk of providing unverified inputs for the VBLM.

Our community relies on accurate outputs to prepare and plan for the next 20 years of growth. Vancouver is correct to assert that the model cannot be approved until all new legislation that impacts the model is addressed/integrated into the model. And, as indicated above, Vancouver (and the other cities) must provide sufficient and accurate detail to meet their part of the obligation to get the VBLM in proper and complete form.

Approving the model now will become a checked box and will certainly need to be revisited before final approval of the 2025 Comprehensive Plan Update. The legal exposure in approving an incomplete model is costly and will likely be a waste of time.

Thank you for considering these comments.

NW Partners for a Stronger Community



September 18, 2023

RE: Vacant Buildable Lands Model (VBLM)

Chair Bowerman and Councilors Yung, Belkot, Medvigy and Marshall -

We appreciated the County Council's search for clarity at the August 30 VBLM workshop, the first review since the current model was adopted over a year ago under the prior Council. The most recent published schedule calls for a September 20 workshop and an October 17 hearing. **We believe this is premature because very little information has been shared on the following: How the model is used under GMA and what its legal requirements are; what last month's model results show, and whether they are accurate; and what the resulting implications are for UGA expansions and allocation of housing, and how new state laws have changed things.**

This letter is submitted in an effort to provide information based on the current VBLM model and its latest results. Our main points are as follows:

- **We need to show our work, not just process and inputs, but also results and outcomes.** The model as currently calibrated grossly undercounts residential capacity in the City of Vancouver and potentially elsewhere, and **is not close to being reasonably accurate** based on a comparison with recent development and pending applications.
- **Adopting the model without significant changes will have negative impacts for our communities,** including: triggering the need for historically large UGA expansion countywide; shifting the burden of accommodating housing and below market housing to unincorporated areas and under planning for capital facilities and services.
- Based on our adopted countywide population forecast, GMA requires our communities to accommodate more than 100,000 housing units than exist today countywide, with many of these at affordable levels. Other new GMA requirements applying to all or multiple jurisdictions in our County further ensure adequate housing of various types. **Knowingly and significantly undercounting residential growth capacity in our modelling in order to generate still more land for housing beyond this is not legal, transparent, or good planning for our communities.**

Whatever one's views on growth, complete information is needed for an informed process and reasonable outcomes. We understand the VBLM will be rerun in October, and would respectfully urge the Council not to make decisions on the model or its assumptions until there has been adequate time to examine the latest model results as well as major assumptions, including a review for general accuracy what the implications of the model results are for regional growth.

**We respectfully request that VBLM results be available at least three weeks before any decisions are made, and recommend the Council not hold adoption hearings on a complex model that it did not have the chance to review the results of at a workshop. Previous local Comprehensive Plan updates had process checks and**

vetting opportunities that are not being used this time, such as Planning Commission review prior to Council decisions, and Council workshops staffed by City and stakeholder as well as County personnel.

Examining only the individual VBLM assumptions without also checking the model results is in our view like building a car, but only testing parts separately before assembly, and never test driving the car after it is built to determine if everything is working together as it should.

Please consider the following:

### **How is the VBLM model used under GMA?**

- **The VBLM is intended to inform policy on growth and density, not set it.** The Council has already chosen countywide growth targets, and in coming months will decide how these are allocated. Local governments will then decide how to accommodate their share of the growth. The GMA Hearings Boards have found that the choice of a growth forecast is in part a policy decision, but this has not been found for land capacity modeling. Capacity analyses should be data-driven and used to inform and support growth policy choices.
- **The VBLM is made up of many assumptions, but none of them have regulatory impact individually.** The model is only applied as a whole.
- **The VBLM is intended under law to be used for a range of purposes.** In addition to functions discussed at the workshop, the VBLM is also used to determine how much land is needed to size new UGAs, and to determine jurisdictions' long term capital facilities needs, plans, and funding. Under GMA internal consistency requirements, a Comprehensive Plan cannot use one capacity estimate for its land use plans and another for its capital facilities plans. The VBLM is also used in public outreach to develop Comprehensive Plans, to inform the public about growth options they are being asked to comment on, and the associated impacts and costs.
- **The VBLM has separate population and employment models.** Adjusting one does not require adjusting the other. The City of Vancouver's primary concern has been with the residential model.

### **How was the current VBLM developed?**

- **Through a well-intentioned, but ultimately incomplete local process:** The City of Vancouver appreciated serving on the Buildable Lands Policy Advisory Committee (BLPAC) advisory committee, but it was disbanded before it could finish its work, and the Council ultimately adopted four key assumptions that were never voted on by the committee.
- Some of the adopted assumptions are contrary to state guidance, or based on data from single family housing only, which does not accurately represent all development
- Neither the advisory committee nor the Council ever tested the results of the model as a whole to determine its accuracy.



### Are the VBLM results accurate?

- **Basic data suggests the VBLM is grossly undercounting residential capacity by a wide margin.** The VBLM reported last month that there was capacity for just 5,197 more housing units in the City of Vancouver, at a time when developers have land use applications under review in the City for well over 12,000 single and multi-family units.<sup>ii</sup> A reasonably accurate model should show the complete reverse of this, as 20-year capacity estimates should be several times larger than the capacity being used in applications currently being processed.
- For the VBLM results to be accurate, the City of Vancouver would need to grow *five times more slowly* per year during the upcoming planning period than it has since 2020, a period that included a pandemic, and no major annexations.<sup>iii</sup> On its face, it's clear that the model under-estimates the residential growth that Vancouver can accommodate.
- Outside of Vancouver, the latest VBLM results show that there are currently 1,380 existing housing units in various non-residential zones in the VUGA and another 3,200 similar units in the small cities, yet the model assumes no housing units at all will be built in these zones in the next 20 years. Housing development on non-residential land would be likely to increase in the future, not come to a screeching halt.<sup>iv</sup>

### What are some of the impacts of using the current VBLM?

- If used in the upcoming EIS, it will misinform the public by significantly underestimating the likely amount of growth and associated impacts that would occur in land use scenarios they are being asked to comment on
- If used in Capital Facilities Plans, it would likely result in significant under-planning of roads and other facilities and services
- Unless there are significant zoning changes, **countywide UGA expansions totaling somewhere around 25 square miles for housing**, not counting additional employment land expansions, will be needed<sup>v</sup>
- **It will shift most of the HB 1220 housing and affordable housing burden to Clark County.** HB 1220 requires planning for and accommodating 100,000 total housing units countywide more than currently exist, and requires approximately half of these to be affordable at 80% AMI or below, and about a third to be affordable at 50% AMI or less. The VBLM indicates the cities together only have capacity for 17,000 new units, leaving the remaining 83,000 or more total units, including tens of thousand of below market units, to be planned for and accommodated in unincorporated areas under County jurisdiction.

### What is the legal status of the current VBLM?

- The current model was developed for the 2022 Buildable Lands Report which was not appealed, but BLR reports are required by GMA to simply determine whether there is or is not sufficient land to meet remaining growth targets of previously adopted plans. Despite its inaccuracies, the 2022 BLR made the right conclusion that there was sufficient remaining land to meet growth targets in place at that time, leaving no realistic grounds for appeal.
- Land Capacity Analyses in Comprehensive Plans are used to size actual UGAs to accommodate new growth targets, however, and unlike the Buildable Lands Reports, these have been the subject of Hearings Board and Court scrutiny.
- The current VBLM is likely to be particularly vulnerable, since there is data and analysis in the record indicating it significantly undercounts residential capacity, but to our knowledge no data or analysis in the

record indicating that the model results as a whole are reasonably accurate. There have also been significant and impactful state and local legislative changes since the VBLM was adopted.

### **How do new housing laws and initiatives change things?**

- **The legislature recently passed several new laws requiring and facilitating more and denser housing going forward. Together these render some of the current VBLM assumptions on densities and redevelopment outdated and inaccurate:**
  - HB 1220 effectively requires the all local jurisdictions to collectively plan for and accommodate over 100,000 more housing units than currently exist, half of these at lower income levels
  - HB 1110 effectively requires Camas, Vancouver and Washougal to allow 4 to 6 unit developments on all single family zoned lots
  - HB 1337 requires all local jurisdictions to allow two ADUs of up to 1,000 feet on all single family lots, with no owner-occupancy requirements, and reduced parking requirements
  - SB 5491 requires cities to allow single stairway buildings of up to six stories instead of the current limit of three stories
  - SB 5258 includes new provisions for condominium liability, and requires impact fees for all housing units be recalibrated based on size and impact to in order to produce lower fees for smaller units
- **Local jurisdictions have also adopted and continue to work on several major recent housing code changes and implementation measures which also render some of the current VBLM assumptions outdated and inaccurate:**
  - The 2022 Vancouver Housing Code Updates project adopted new and updated standards to facilitate middle and higher density housing. Vancouver has also significantly expanded its MFTE program, and is currently implementing a Housing Action Plan to increase housing production through a range of measures.
  - The 2022 County Housing Options Study and Action Plan (HOSAP) and implementing code changes scheduled for adoption this fall also provides new zoning standards to facilitate more and smaller housing
  - The Cities of Battle Ground and Camas adopted Housing Action Plans in 2021. Ridgefield adopted an Affordable Housing Plan in 2022.

**What can be done to make the VBLM results at least reasonably accurate?** There is ample opportunity to get this right, but it will require us to take the time needed, and to update some of the existing assumptions:

- **Process.** When considering any individual assumption, consider how well it is supported by recent development data, and how that may change under new state and local housing laws.
- **Substance.** We will provide more information prior after the next the model run and prior to the hearing. In order to correct the residential undercounting and have the model provide reasonably accurate results, the following VBLM residential assumptions should be updated:
  - Densities. Use assumed densities by zone, as required by HB 1220
  - Development on vacant or underutilized non-residential land. Update to reflect current market realities revealed by recent VBLM results that approximately 10% of existing housing units in

Vancouver, the VUGA, and the small cities are located on various non-residential zones that the VBLM assumes will have no housing over the next 20 years.

- Redevelopment of lands considered built. Update to reflect current trends and anticipated increases under new laws, particularly HB 1337, which requires all jurisdictions to allow two ADUs on single family residential lots, with no owner-occupancy requirement and reduced parking requirements; and HB 1110, which requires Vancouver, Camas and Washougal to effectively allow 4 or 6 units on all single family lots.
- On-site infrastructure. The current VBLM assumption that 31.5% of lands won't develop because of infrastructure is based on single family data. Create a separate and lower assumption for development on multi-family or non-residential land, or a lower total assumption if only one residential number is used.
- Off-site infrastructure. Current estimates developed outside of the advisory committee process were based on plans, not development data. County GIS calculated a 4.5% figure which should be used.
- Critical Lands. Recent written testimony recommended lowering the current and longstanding VBLM assumption that 50% of designated critical lands will develop to 20%, based apparently on a forthcoming study of nine projects. The County Buildable Lands Project team recommendation of 40% that the advisory committee never had a chance to vote on looked at *all recent plats* in urban areas countywide, however. The Project Team analysis was itself incomplete, however, because it did not consider any multi-family development, which typically requires fewer critical lands deductions, and represents most new housing in Vancouver and an increasing share elsewhere. We suggest using a higher separate estimate for development on multi-family or non-residential zoned lands, or keeping the current total critical lands deduction estimate of 50%.

Thank you again for considering this important information. The City of Vancouver fully recognizes the ongoing housing affordability crisis and has taken and will continue to take steps to boost production of housing, particularly more attainable housing. Our key points again are as follows:

- We need to show our work, including results and outcomes. The current model results are no not close to being reasonably accurate based on a comparison with basic growth and development data.
- Adopting the model without significant changes will have negative impacts for our communities, including historically large UGA expansions, shifting the most GMA housing burdens to unincorporate areas, and underplanning capital facilities and services.
- GMA already requires accommodating more than 100,000 new housing units countywide, and contains several other new requirements to ensure adequate housing of various types. Significantly undercounting residential growth capacity in modelling to generate still more land for housing is not legal, transparent, or good planning for our communities.

We look forward to continued dialogue on this issue and follow up responses to the specific questions posed in this letter, and request the Council not adopt a capacity model to inform the growth of our communities without demonstrating that its results are reasonably accurate.

Sincerely



Erik Paulsen, Vancouver City Councilmember

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<sup>i</sup> *Karpinski et al v. Clark County*, Case No. 07-2-0027 (Amended FDO (June 3, 2008) at 11-13.

<sup>ii</sup> The City of Vancouver maintains a [dashboard](#) of current multi-family residential projects showing on page 7 current applications under review accounting for 12,539 units. Single family units under review are in addition.

<sup>iii</sup> 2023 City of Vancouver population of 199,600 (OFM) plus additional VBLM estimated growth capacity of 13,825.8 persons (August 2023 VBLM, p2 of Vancouver section) equates to 0.3% annual growth, compared to 1.5% annual Vancouver growth 2020-23 per OFM

<sup>iv</sup> 6/13/23 VBLM draft circulated 8/10/23, pages 2 of each City section

<sup>v</sup> RCW 36.70.A.070.2.a requires Comprehensive Plan housing elements to identify “..*the number of housing units necessary to manage projected growth, as provided by the department of commerce*”. Emphasis added. Based on Clark County’s chosen countywide population forecast of 718,146, the DOC HAPT tool identifies 115,705 total housing units to be accommodated countywide from 2020 to 2045. Subtracting the 12,008 units constructed countywide from 2020 to 2023 per OFM leaves 103,697 units to be accommodated from 2023 to 2045. The 6/13/23 VBLM Draft identifies a total long term urban areas capacity of 39,797 units, which added to last available estimated rural capacity of 4862 units from Buildable Lands Report yields a total 2023 countywide capacity of 44,659 units, resulting in a 2023 deficit of 59,038 units (103,697-44,659). Additional units will be added from 2023 to 2025, but these should be offset by corresponding reductions in capacity, leaving a similar unit deficit count in 2025.

The 59,038 unit deficit divided by 9 units per acre (countywide average observed units per acre in BLR Figure 10) results in 6559 net acres needed. Per 8/30/23 County GIS presentation slide 25, VBLM gross to net ratios after applying assumptions are 100/61.6 for vacant land, 100/47.9 for underutilized, 100/30.8 for vacant constrained, and 100/23.9 for underutilized constrained, for an average of 100/41.1. The gross acreage of expansion needed is 15,958 (6559 x 100/41.1), or 24.9 square miles.

This does not include commercial or industrial lands expansions to serve the added housing and population.



## Technical Addendum: VBLM Planning Assumptions-2025 Modifications

### 1. Critical Areas Assumption

#### Background

The current Buildable Lands Report (BLR), completed in June 2022 asserts that “50% of available constrained (critical) land will not convert”. This implies that 50% of critical areas will convert(develop). Based on industry expertise and real-world experience on the ground, this figure is not at all realistic for residential development here in Clark County.

For the 2022 BLR, the BLPAC considered modifying the critical areas planning assumption, but never took action.

#### The Critical Areas Study

The goal of this analysis was to explore completed residential developments from the recent past and examine what percentage of critical areas truly convert. When referencing the term “truly convert” we are talking about critical areas with direct impacts or buffer reductions. NW Partners urges the Council to examine the following data and analysis. We recommended modifying VBLM planning assumptions in regard to critical areas conversion rates as part of the 2025 Comprehensive Plan Update.

The following analysis was completed by Mackay Sposito and Ecological Land Services.

Project Name	Jurisdiction	Total Project Area (acres)	Development Area (acres)	Critical Area Existing (acres)	Critical Area Final (acres)	Critical Area Converted to Dev. (acres)	Percentage of Critical area converted (%)
Bloomquist	Battle Ground	39.1	13.1	26	17.1	8.9	34
Cedar Heights	Battle Ground	33	28.1	4.9	4.9	0	0
Creekside Heights	Battle Ground	32.4	20.8	11.6	10.1	1.5	13
Green Mountain Estates	Camas	98.4	84.2	14.3	14.2	0.1	1
Parkers Abbey	Clark County	27.1	21.6	5.5	5.5	0	0
Eastpointe	Vancouver	14	11.8	3.2	2.5	0.7	22
Woodin Creek	Battle Ground	65	40.3	24.3	16.7	7.6	31
WDFW HQ	Ridgefield	11.6	7.3	3.3	2.7	0.6	18
Pioneer Village	Ridgefield	20.4	8.3	12.1	8.5	3.6	30
NE Delp Rd. Mitigation	Clark County	9.6	3.9	5.7	4.4	1.3	23
Rivendell	Clark County	30.5	20.7	9.8	9.7	0.1	1
Quail Acres	Clark County	2.8	0.2	2.6	2.3	0.3	12
Kevanna Park Meadows	Vancouver	6	2.2	3.8	2.5	0.7	18
Battle Ground Village	Battle Ground	20	0.7	19.3	17.7	1.6	8
<b>Total</b>		<b>409.9</b>		<b>146.4</b>	<b>118.8</b>	<b>27</b>	<b>15.07142857</b>

## Understanding the Critical Areas Data

This study shows that the average critical areas conversion rate is close to 15%. NW Partners asserts that the critical areas “never to convert factor” should be closer to 85% rather than the current VBLM assumption of 50%. The actual data reported in this study shows a disparity between inputs into the VBLM and real development on the ground from a variety of jurisdictions across Clark County.

To bring the VBLM into a defensible margin of accuracy, we urge a modification of the never to convert factor to more responsibly and accurately model the buildable acres within the County.

### **Recommendation for Critical Areas Assumptions**

**Based on the current regulatory environment and its inevitable increase in restriction, NW Partners recommends a critical areas never to convert factor of 85%.**

## **2. Public Sector Land Acquisition Deductions Assumption**

### Overview

NW Partners urges the Council to consider a deduction on buildable acres to reflect acreage acquired by local jurisdictions including parks, schools, and infrastructure which deduct a substantial amount of land from the inventory. As evidenced by the sample data in the Camas/Lacamas Lake sample (see below), cities must remove city-owned parcels which will not be developed for residential, and for this reason, must not be included in their capacity.

If jurisdictions are not accounting for this deduction and are including as buildable land in their respective reporting it will skew the data produced in future VBLM runs.

### **Part 1: Parks**

#### Background-

The 2016 Comprehensive Plan (page 28) states that Clark County has been involved in land acquisition for parks since the 1930's and established the Clark County Parks Division in 2014 under the Department of Public Works along with and the associated Clark Parks Advisory Board (PAB).

Despite significant planning related to parks, park land is inappropriately being counted toward capacity in the VBLM. Set-aside for parks is not mentioned in the index of topics covered in the BLPAC Report, thus staff recommended zero deduction for parks on the supply side.

### **Public Sector Land Acquisition Sample**

To reflect the magnitude of this deduction, NW Partners conducted a sample study and an analysis of residential land acquired by the City of Camas. In reviewing recent purchases that the City of Camas made along the north shore of Lacamas Lake, we identified 127.3 acres of land (see below) that is zoned for residential or mixed-used use development. The city acquired

the property with the intent to build public parks. Based on a preliminary yield analysis, ***this land could accommodate over 1,100 units of housing.***

Parcel ID	Year Acquired	Sq/F	Zoning	Residential Density	Notes
986050873	2018	985,763	R-18	407 multifamily units	
175703000	2012	17,424	R-18	7 multifamily units	
175721000	2020	2,328,282	R-12/CC	101 single family + 240 multifamily units (CC zone)	Dual zoned; density assumes 50% R-12 zoned; CC zoned land assumes density of 50% of R-18 zone due to mixed-use requirements
175774000	2020	43,560	R-12	4 single family units	
175720000	2019	131,551	CC	27 multifamily units	CC zoned land assumes density of 50% of R-18 zone due to mixed-use requirements
177903000	2019	172,498	CC	36 multifamily units	CC zoned land assumes density of 50% of R-18 zone due to mixed-use requirements
177905000	2020	1,423,976	R-7.5	203 single family units	
177898000	2018	442,134	R-7.5/CC	32 single family + 46 multifamily units (CC zone)	Dual zoned; density assumes 50% R-12 zoned; CC zoned land assumes density of 50% of R-18 zone due to mixed-use requirements
	Total Acres	127.3	Total Units	340 single family + 763 multifamily units	<b>1,103 units of housing on future parkland</b>

1. If the City of Camas did not account for this deduction when estimating existing capacity as an input to Clark County Community Planning for the VBLM, the result would be an inflated output buildable acres that does not reflect the actual capacity.
2. We urge Council and staff to implement a VBLM planning assumption that accounts for deductions for parks and schools to account for current and future public sector land acquisition.

### **Recommendations for Parks Assumptions**

**NW Partners recommends a set-aside for parks of 12.8%.**

**NW Partners urges Clark County to adjust the VBLM to reflect a deduction to account for undevelopable park land.**

### **Part 2: Schools-**

#### **Background**

Set-aside for schools is not mentioned in the index of topics covered in the BLPAC Report associated with the 2022 Buildable Land Report (BLR). Thus, they recommended zero deduction whatsoever for schools on the supply side. In 2022, the Building Industry Coalition asked that Clark County proactively adjust the BLR knowing that school land is clearly not developable.

#### **Schools Sample Data**

Schools are centric to growing communities, therefore, land for schools must be accounted for. Below are the estimated site sizes from various school types:

Elementary schools- 10 acres

Secondary/middle schools- 20 acres

High Schools - 40 acres

Appendix E of the 2016 Comprehensive Plan (pages 388-390) show that using those averages, 520 acres of land were needed for schools in the 2015-2035 plan period. The 2015 BLM yield report shows there were 7,512.6 residential developable net acres.

In addition, a review<sup>1</sup> of change in the amount of school lands between 2016 and June 2021 was identifiable in the Assessors database by owner name. The figures are not pure because whereas 169 acres of new school land were added, 108 were surplus. This results in a delta of 60.6 acres. It is unclear what will happen with the developability of surplus land. It may

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<sup>1</sup> The review was provided on June 18, 2021 by Bob Pool on a PowerPoint entitled "School and Park Lands."



remain undevelopable. In addition, new school land came from a mix of land uses beyond just residential.

Using the results provided above,  $520 + 60.6 = 580.6/7513 = 7.73\%$ . The assumption of 7.9% deduction for school land is recommended because of the unknown number of surplus acres that remain undevelopable.

### **Recommendation for Schools Assumptions**

**NW Partners recommends that VBLM assumptions be adjusted to reflect a set-aside for schools at 7.9%.**

### **3. Urban/Rural Split**

#### **Background**

In previous comprehensive planning cycles, the Council has chosen a 90/10 split or 90% of growth will be accommodated in the urban areas and 10% will be accommodated in rural areas. Given increased density, a reduction of urban sprawl, and planning policies in the State of Washington urban areas have taken on much of the new growth. Clark County Community Planning staff stated that the current split looks more like 94/6 now based on data collected. The Council should reflect this with the VBLM planning assumptions.

### **Recommendation for urban and rural split assumption**

**NW Partners recommends an urban/rural split of 95/5.**