

From: [Sonja Wiser](#)
To: [Maren Calvert](#); [Steve Horenstein](#)
Cc: [Bart Catching](#); [Jose Alvarez](#); [Oliver Orjiako](#)
Subject: RE: Ltr re UGA Expansion for Bradley S. Thomas Construction LLC [IWOV-PDX.FID4983966]
Date: Thursday, November 2, 2023 11:35:00 AM
Attachments: [Ltr re UGA Boundaries Expansion for Bradley S. Thomas Construction LLC.pdf](#)
[image001.png](#)

Good morning Maren, your request has been received and will be put into the Clark County Index of Record for the 2023-2025 Comp Plan Update. Thank you

From: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Sent: Thursday, November 2, 2023 10:53 AM
To: Sonja Wiser <Sonja.Wiser@clark.wa.gov>
Cc: Bart Catching <Bart.Catching@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: FW: Ltr re UGA Expansion for Bradley S. Thomas Construction LLC [IWOV-PDX.FID4983966]

Here's a site-specific request for the record. Thanks.

Oliver

From: McKee, Lisa D. <LMcKee@schwabe.com>
Sent: Wednesday, November 1, 2023 3:01 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; bryan.snodgrass@cityofvancouver.us;
rebecca.kennedy@cityofvancouver.us
Cc: Calvert, Maren L. <MCalvert@schwabe.com>
Subject: Ltr re UGA Expansion for Bradley S. Thomas Construction LLC [IWOV-PDX.FID4983966]

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Hello,

Attached is a letter from Maren Calvert regarding Bradley S. Thomas Construction LLC and a UGA Boundaries Expansion.

If you have any trouble opening the attachment, please let us know.

Thank you.

Lisa McKee

Legal Assistant to Maren Calvert,
Patrick Mullaney, and Julie Wilson-McNerney
(360) 905-1105
lmckee@schwabe.com



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Schwabe

November 1, 2023

VIA US MAIL & E-MAIL:

OLIVER.ORJIAKO@CLARK.WA.GOV;
BRYAN.SNODGRASS@CITYOFVANCOUVER.US;
REBECCA.KENNEDY@CITYOFVANCOUVER.US

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Oliver Orjiako
Clark County Long Range Planning
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Vancouver, WA 98660

Bryan Snodgrass
Rebecca Kennedy
City of Vancouver, Planning Department &
Community Development
415 W. 6th Street
Vancouver, WA 98660

RE: Urban Growth Area Boundaries Expansion
Owner: Bradley S. Thomas Construction LLC
Property Address: No site number NW 151st Street
Tax Parcel Identification No.: 185182-000

Dear Mr. Orjiako, Mr. Snodgrass, and Ms. Kennedy:

Our firm represents Bradley S. Thomas Construction LLC (Thomas), which currently owns real property located adjacent to the City of Vancouver's Urban Growth Area and/or Boundary (UGA/B), on two sides. Our client would like its property (the "Thomas Property") to be included in Vancouver's upcoming UGA/B expansion.

The Thomas Property is small, containing only 5 acres. Thomas intends to develop it with 17 to 34 affordable, single-family residential units, essentially as "phase 2" of the Chinook Place residential subdivision. Thomas built Phase 1 of Chinook Place inside UGA/B nearly 20 years ago. Phase 1 is identified in the photo to the right in a red rectangle. The Thomas Property, hopefully Phase 2, is identified with a red star.

Thomas Property Basics.

- Tax Parcel ID No.: 185182-000 contains 5.0 acres, more or less
- No site number NW 151st Street, Vancouver, Washington
- Flat, open, and grassy without trees



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November 1, 2023

- Vacant and unimproved
- 151st Street road frontage and most utility services available nearby

Proximity to Existing UGA/B

The Thomas Property currently abuts the north side of Vancouver's UGA/B, just north of NW 147th Way and west of NW 25th Avenue. As illustrated in the GIS screenshots on the previous page, the properties immediately south (Chinook Place subdivision) and on the southeast two-thirds of the Thomas Property are inside the UGA/B and are fully developed. Lands to the west and north are outside the UGA/B and include a mix of single-family residential and Open Space designations.

Additional Physical Characteristics.

- The Thomas parcel is shaped as a rectangle.
- Currently zoned Rural-5 (R-5) with a Comprehensive Plan Designation of R-5;
- Regular tax status;
- Soils are non-hydric with low to very low liquefaction;
- No flood zone or wetlands designation;
- Situated within Clark Public Utilities water service district. Water services are not presently available at the parcel but water facilities, including water and storm water lines, exist within 151st Street, along the parcel's north border. Existing water and storm water facilities also serve the residential developments east and south of the Thomas Property at distances of approximately 100 feet or less from the Thomas property lines;
- Sewer services are not presently available at the parcel but sewer facilities exist within the residential developments east and south of the Thomas Property at distances of approximately 100 feet or less from the Thomas property lines;
- Electric utility services in the area are provided by Clark Public Utilities;
- Police services are provided by Clark County Sheriff's Office;
- Fire services are provided by Fire District 6. There are six fire hydrants situated within 500 feet of the Thomas Property, including one located on 151st Street, approximately 60 feet from the north border of the parcel; and
- Transportation infrastructure in the vicinity includes public roads, including a minor arterial with C-Tran service (NW Bliss Road) and a collector (NW 21st Ave). The entire length of the north border of the Thomas Property is contiguous with NW 151st Street.

Suitability for Inclusion in UGA/B Expansion.

For the reasons presented in this letter, on behalf of Thomas, we request that the Thomas Property be considered for inclusion in Vancouver' UGA/B. The Thomas Property will help the City meet its urgent need for additional residential units by providing a relatively small amount of new additional land, immediately adjacent to existing utility facilities and a transit corridor. This will help the City accommodate its growing population, avoid urban sprawl, manage the costs of growth, and potentially increase the use of multi-modal transportation.

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November 1, 2023

Last updated in 2011, the City’s Comprehensive Plan concludes the City has an “estimated land capacity to accommodate 430,000 persons by 2030, approximately 15% more than the long term allocation adopted by Clark County for [the City] in 2007.” Comp Plan at p. 1-7. This conclusion, however was based on Clark County’s 2007 planning assumptions (*id.*, Appendix C), which grossly under-estimated the need for land for urban population growth.

Clark County’s first comprehensive plan assumed 81% of population growth would be in urban areas and 19% would be rural. The past 30 years have shown that assumption was incorrect. Actual growth has been 90-95% urban and 5-10% rural. This means, the City needs more land.

Further complicating the analysis, the County’s Vacant Buildable Lands Model (“VBLM”) assumes 50% of the vacant buildable lands, burdened by critical areas, will convert into residential development. This assumption has proven to be more than *double* the actual conversion rate of 15-25%. The City and the County, therefore, do not have the “excess” developable land, that they assumed.

To the contrary, the City has grown significantly faster than planned. The current population of the incorporated City is 199,600, which is just 2,795 people shy of the 2030 population estimate in the Comprehensive Plan.¹ Comp. Plan., Appendix C. That means, at the rate the City is growing, the City will pass its 2030 population projection next year, *six years* ahead of schedule.

Moreover, as the Mayor recently explained, this year’s population growth projections indicate the City is anticipated to grow to a population of 450,000 by 2045 – more than double the current population.² This number exceeds even the City’s capacity calculations in the Comprehensive Plan for the City and the unincorporated Vancouver UGA *combined*. This means, even if the County’s VBLM model and urban/rural population growth projections were not wrong (which we know they are), the City is *still* going to need more land.

Adding to these pressures, the Washington State Legislature passed a series of bills into law this year that will further increase the pressure on the City to increase housing availability. While many of these new laws focus on density, density alone will not be able to satisfy the City’s growing need for housing of all types in all areas. For example,

- HB 1220 effectively requires local jurisdictions to plan for and accommodate 100,000 more housing units than currently exist, half of those being 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 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

¹ <https://mrsc.org/research-tools/washington-city-and-town-profiles#V>

² <https://www.kgw.com/article/entertainment/television/programs/straight-talk/vancouver-mayor-city-growth/283-dcdd3f36-0de4-4317-a4db-ac8c77ddc8df>

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Bryan Snodgrass & Rebecca Kennedy, City of Vancouver
November 1, 2023

- SB 5258 requires impact fees for all housing units be recalibrated based on size and impact to produce lower impact fees for smaller units

While these bills (now laws) authorize and encourage development of smaller, denser housing (townhomes, ADUs, etc.) those housing types will not satisfy *all* of the City's housing needs. The City needs more housing units of all types, everywhere

Expanding the City's UGA/B to include the Thomas Property (which is only 5 acres) will help alleviate some of these pressures. The Property is already zoned for residential use and is vacant, so the County will not lose productive agricultural land, or precious open space or forest land, through this proposed change.

Expanding the Chinook Place subdivision to the north will immediately provide land for at least 17 homes with up to two accessory dwelling units (ADUs) each, pursuant to HB 1337, above – for a total of 51 middle-housing units. Alternatively, Thomas has considered reworking the design to accommodate smaller lots and up to 32 single-family homes.

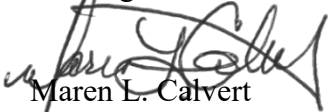
Expanding the Chinook Place subdivision to the north would have the added benefit of connecting these residential subdivisions to NW 151st Street – a major arterial and transit corridor. This will improve vehicular, pedestrian, and multi-modal transportation for this quickly growing area.

Taken together, the features of the Thomas Property, therefore, will help enhance the livability of the City. *See* Comp. Plan. at p. 1-6 (“Livability involves balancing protection of open space and environmental resources, with promoting efficient development patterns that can be served by a range of transportation options.”)

Based on the above, Thomas respectfully requests that the County and the City include the Thomas Property in the UGA/B for the City of Vancouver. Thomas requests the property retain its designation as residential land and that it be zoned for single-family residential use, as discussed above. This will ensure continuity in the neighborhood and provide much needed affordable, middle-market housing, in short order.

Please let us know if you have any questions or would like to discuss this matter further.

Best regards,



Maren L. Calvert

Cc: Bradley Thomas
Steve Horenstein