

From: [Oliver Orjiako](#)
To: [Jose Alvarez](#)
Cc: [Sonja Wiser](#)
Subject: FW: Response to October 12 NWP request for more information from the City of Vancouver regarding VBLM
Date: Monday, November 6, 2023 1:24:40 PM
Attachments: [23 11 03 COV ltr to NWP .pdf](#)

Hi Jose:

Here's it. Sonja, for the comp plan record. Thanks

From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Monday, November 6, 2023 11:51 AM
To: Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Paulsen, Erik <E.Paulsen@cityofvancouver.us>; Kennedy, Rebecca <Rebecca.Kennedy@cityofvancouver.us>
Subject: Response to October 12 NWP request for more information from the City of Vancouver regarding VBLM

CAUTION: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Councilors

On behalf of the City of Vancouver, please find for the record a response to the October 12 letters from Northwest Partners to the City of Vancouver and Clark County requesting additional information about Vancouver's VBLM position. Thank you very much.



November 3, 2023

RE: Northwest Partners October 12 letters to City of Vancouver and Clark County requesting background information on City of Vancouver position on County Vacant and Buildable Lands Model (VBLM)

Northwest Partners Task Force Members:

On behalf of the City of Vancouver, the following is provided in response to NWP's [October 12 letters](#) requesting additional information:

Although our [September 18](#) letter and prior submittals provide documentation and footnoting, we are happy to provide follow-up and have attached specific answers to the NWP questions. We hope this leads to further dialogue and believe examination of our respective positions can provide better information to decision makers. Our overriding concern is that the County VBLM model grossly underestimates *current* residential growth capacity in Vancouver and probably elsewhere, as shown by various data. As noted, the 2023 VBLM results released this September estimate that Vancouver's housing capacity for 20 years is less than half of the number of housing units currently in the City's development pipeline right now. These VBLM results also assume Vancouver's annual population growth in current city limits over the upcoming planning period will be five times slower than it has been over the past three years, a period when there was a pandemic and no major annexations. Countywide the VBLM also assumes there will no further housing growth in various non-residential, non-mixed-use designations across our communities that the VBLM itself indicates contain thousands of housing units now. This residential undercounting problem will likely only get *worse* in the near future after Vancouver and other jurisdictions update zoning designations and standards in their upcoming Comprehensive Plan updates as required to comply with the many new housing laws.

The VBLM is currently being updated, but given its deeply inaccurate results to date, it is not surprising that the model currently includes several key input assumptions that were not recommended by the Buildable Lands Project Advisory Committee (BLPAC), and appear to be inconsistent with state law and the balance of local data.

Please see our enclosed responses to the specific NWP questions herein for documentation of the above concerns.

It is encouraging that there appears to be agreement that the VBLM needs to produce accurate results, and address recently adopted laws. We fully concur with NWP's statement in its October 12 letter to the County 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.*" In our view this means not only updating VBLM input assumptions to account for the new laws, but also verifying the model's resulting outputs for accuracy. Outputs are how the model is applied in practice, and without verifying output

accuracy against basic growth data it is impossible to determine if the VBLM's assumptions are fully accurate or work together the way we think they do. A newly built car needs to be test driven, even if its individual parts were checked separately before assembly. If the car isn't driving right, parts need to be adjusted until it is fixed.

We also agree with the NWP's concern that the VBLM needs to be complete. Any assumption or step used to calculate residential or employment capacity should be incorporated into the model and reflected in its periodic reports.

We also agree with the statement in the email we received from Steve Horenstein conveying the NWP October 12 letters, that *"..getting the VBLM wrong at this point in the planning process will negatively affect other decisions yet to be made and will no doubt result in a do-over being required by the Washington Growth Management Hearings Board."* GMA requires internal consistency, and one capacity estimate cannot be used for land use plans while another is used for capital facilities. Any capital facilities plan based on gross underestimates of residential growth capacity will result in under planning for needed facilities and services. Any EIS using a VBLM model like the one now in place will mislead the public and stakeholders, by grossly underestimating the amount of growth and resulting impacts of alternatives they are being asked to comment on.

There are areas of disagreement. We have questions about NWP's recommended assumptions in the October 12 letters, which appear to be made based on limited and highly selective sample data, in some case taken from plans rather than actual development history. The NWP recommendations would each make the recent VBLM results less accurate by increasing the residential undercount problem, and there is no indication of whether they address the spate of new housing legislation. We would respectfully request a response for the record.

Thank you again for your inquiry and we look forward to further discussion.



Bryan Snodgrass, Principal Planner, City of Vancouver Community & Economic Development Department

c: Erik Paulsen, Vancouver City Councilmember
Eric Holmes, Vancouver City Manager
Chad Eiken, Director, City of Vancouver Community Development Department
Rebecca Kennedy, Deputy Director, City of Vancouver Community Development Department

Responses to NWP Questions:

1. Vancouver September 18 letter: “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.”
NWP question: What specific assumptions are contrary to state guidance?

Response: As noted in June 2022 Vancouver [comments](#) when the current model was adopted, the below assumptions are inconsistent with state guidance, and all add to the VBLM residential undercount problem.

- VBLM residential density assumptions are based on data from development observations with critical lands *included*, contrary to [Buildable Lands guidance](#) (page 26) that density estimates be based on data that *excludes* critical lands. This effectively results in a double count, as critical lands are deducted in a separate VBLM assumption.
- VBLM on-site infrastructure assumptions are based on observations from single family development only, with no data from multi-family development which typically sets aside far less space for infrastructure and represents the majority of current activity in Vancouver and an increasing share elsewhere. Relying on single family development data to represent multi-family development is inconsistent with State [Buildable Lands guidance](#) (page 23) stating that ***“Capacity calculations that have traditionally been oriented around greenfield development sites will increasingly need to consider urban dynamics and redevelopment.”***
- Critical lands deductions are also based on single family development data only, also excluding increasingly frequent multi-family development that occurs on larger lots with landscaping requirements that allow for more flexible accommodation of critical areas with fewer deductions. Excluding multi-family development is also contrary to the page 23 Guidance language cited above that urban dynamics and redevelopment need to be considered rather than traditional greenfield development.
- VBLM Residential redevelopment is assumed to occur at slower rates than what has occurred in the recent past, let alone the anticipated future rates under new GMA housing requirements. This is inconsistent with the page 23 state guidance language cited above which calls for an *“increasing”* need to consider urban dynamics rather than greenfield development patterns.
- VBLM development on non-residential lands is also assumed to occur at slower rates less than in the recent past in Vancouver, or assumed not to occur at all over the next 20 years in designations in other jurisdictions countywide where thousands of homes have been built. This is also contrary to the page 23 Guidance language stating that urban dynamics rather than traditional green field development needs to be considered.

2. Vancouver: **“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.”** NWP: Please provide a map, record of applications, and calculations that document the proposed placement of the 12,000 housing units.

Response: This City of Vancouver first raised this issue in June 2020 [comments](#) to the BLPAC, where a full list of pending multi-family applications, their addresses, zones, and the number of units proposed was submitted. Since that time pending applications have doubled, and the City of Vancouver has established a public facing [website dashboard](#) tracking the development project applications citywide at

any given time. Pages 1-6 list individual projects and provides mapping. Page 7 lists the total number of multi-family units under application, including breakdowns by stage of application review. As of November 2, 11,518 multi-family units were reported under review. A staff review found that 731 single family or duplex lots in applications currently under review, for a total 12,249 housing units currently in the pipeline. The dashboard was linked to in our September 18, 2023 letter.

3. **Vancouver: “On its face, it’s clear that the model under-estimates the residential growth that Vancouver can accommodate.”** NWP: Please show your work. How and where will Vancouver accommodate the coming growth? What exactly is the plan in detail?

Response: Vancouver like other jurisdictions has not yet determined the extent of specific changes needed to comply with the new housing laws, and has not drafted a proposed new land use plan or estimated what it’s long term growth capacity will be. But its clear from various different types of development data and the report itself that the VBLM is grossly undercounting *current* residential capacity, even without the upcoming changes to zoning designations and standards needed to increase housing capacity in compliance with the new state laws.

- Pending application data. As noted in the September 18 letter, the recent VBLM estimated the City had capacity for only 5,197 housing units for 20 years, at a time when applications for over 12,000 units were pending. For this to be accurate, more than half of units in pending applications would need to go unbuilt, and no new housing applications approved at their locations or anywhere else in the City for 20 years. One would expect the complete reverse, where the capacity represented by pending applications is several times less than the capacity over a 20-year period.
- Recent population growth data. As also documented, for the VBLM to be accurate, Vancouver would have to grow five times more slowly per year for the next 20 years than it has over the past three years according to OFM, a period that included a pandemic and no major annexations.
- VBLM model output data itself indicating where growth is occurring. The recent VBLM model results themselves explicitly indicate that there are currently over 8,092 housing units in the City of Vancouver located on non-residential and non-mixed use designations, and another 1,380 in the VUGA, and some 3,200 in the smaller cities. Yet the VBLM results attribute no new housing growth in any of these zones in any of the jurisdictions countywide for the next 20 years.

See our response to NWP question #2 herein, and endnotes to our [September 18 letter](#) for documentation of the above.

4. **Vancouver: “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.”** NWP: 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?

Response: In addition to the above 4,600 existing housing units outside the City of Vancouver on lands not designated residential or mixed use, the recent VBLM results also identify 8,092 similar units in the

City of Vancouver. Many or most of these countywide have probably been built under allowances of various kinds for residential development on commercial or industrially designated land. Although not located in mixed use districts, many may involve a mix of employment and housing. These types of allowances may increase in the future, as recommended in the adopted County HOSAP study. At minimum the VBLM should include assumptions in Vancouver and elsewhere that residential development on non-residential or non-mixed use designated land will occur at the rates it has in the recent past.

5. **Vancouver: “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.”** NWP: Please provide a detailed plan of the zone changes that would have to occur to avoid UGA expansions.

Response: We do not know what rezones countywide would be needed by various jurisdictions to avoid UGA expansions if the current VBLM is used, or if this is feasible. The point is that by grossly underestimated residential growth capacity, the VBLM model creates a wild disconnect between the capacity of housing that can be considered available in existing urban areas and the number of units that must be planned for and accommodated under law, with negative consequences countywide. Over 100,000 additional housing units are required by HB 1220 to be accommodated countywide, but the VLBM currently only assumes existing urban areas have room together for 39,000 units, so some combination of either historically large UGA expansions or historically large upzones in existing urban areas will be needed countywide to accommodate 61,000 more units.

Furthermore, by grossly underestimating growth capacity in cities in particular, the VBLM forces Clark County to bear the vast majority of the housing and affordable housing burden of HB 1220. The latest VBLM estimates that the cities together only have long term capacity for 17,000 additional housing units leaving some 83,000 units (100,000 new units required under HB 1220 minus 17,000) that would then need to be planned for and accommodated in currently unincorporated areas, half of these at below market rates.

6. **Vancouver: “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.”** NWP question: According to GMA and Vancouver’s understanding, when is the proper time within the law for an appeal?

Response: The time to appeal a land capacity analysis used to support a Comprehensive Plan is after the Comprehensive Plan is adopted. The fact that the 2022 Buildable Lands Report was not appealed does not mean the analysis it used is appropriate or legally safe to use in the 2025 Comprehensive Plan, since the BLR Report was only required by GMA to determine whether there was or was not sufficient land to meet growth targets of the previously adopted plans. Despite its gross inaccuracies, the 2022 BLR rightly reported that there was sufficient land to meet the growth targets in place at that time, leaving no realistic grounds for appeal.

City of Vancouver questions on NWP's proposed assumptions in October 12 letters:

1. Why should the NWP recommendation for critical lands deductions of 85% based on a handpicked sample of 14 projects be used for single family development instead of the County BLPAC project team recommendation of 40% which was based on all plats, a much larger and more representative sample? Why should either the NWP or County BLPAC project team recommendation be used for critical area deductions for multi-family development since both are based entirely or almost entirely on single family data? See slides 27-32 of project team [presentation](#).
2. Why should the NWP recommendations for off-site infrastructure deductions of 12.8% for parks based on data from Camas only, and 7.9% for schools based on data reflecting park or school facility sizing *goals* as opposed to *actual* historical development be used instead of [2022 County GIS recommendations](#) for both, which stated that *“Actual percentage was: 4.55% of the Gross Vacant Buildable land that converted by 2021, converted to schools or parks by 2021.”*
3. Why should the NWP recommendation that the future urban/rural population split will be 95/5 instead of the long term capacity projections for urban and rural areas in the [2022 Buildable Lands Report](#) which equated to 93/7?.
4. Why should any NWP recommendations for individual input assumptions be adopted without an indication of how they will improve overall model results? The September 2023 VBLM results estimate 20-year capacity of 5,197 housing units in the City of Vancouver and 39,797 units in all urban areas countywide. Does the NWP believe these results are over or under-estimate housing capacity, and if so why?