

Jenna Kay

From: Noelle Lovern <Noelle@biaofclarkcounty.org>
Sent: Sunday, November 26, 2023 7:54 AM
To: Karen Bowerman; Glen Yung; Gary Medvigy; Michelle Belkot; Sue Marshall; Kathleen Otto; Oliver Orjiako; Jenna Kay
Subject: PUBLIC COMMENT: Climate Resiliency-Comp Plan: Public Participation Plan
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Greetings, Chair Bowerman, County Councilors, County Manager, and staff.

Thank you for the opportunity to weigh in on the pending Public Participation Plan associated with the Climate Resiliency Plan to be integrated in the 2025 Comp Plan. Attached is the BIA's comment for the record. Below are some highlights from our public comment. We urge staff and Council to consider these modifications to the PPP:

- a. Provide clarity on how the plan will consider Clark County residents desired priorities including their household's threshold for affordability.
- b. Include utility providers (NW Natural and Clark Public Utilities) in the proposed Community Advisory Group and the Interdepartmental and Interagency Coordinating Team.
- c. Include Realtors (i.e. the Clark County Association of Realtors) and commercial builders (in the form of members of Southwest Washington Contractors Association) in the Community Advisory Group.
- d. Add a labor partner to the Community Advisory Group.

We invite you to review our public comment and reach out with any questions you might have.

Best,

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

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November 26, 2023

Clark County Community Planning
PO Box 9810
Vancouver, WA 98666-9810

Public Comment: Climate Resiliency/Public Participation Plan

Dear Chair Bowerman, County Council, County Manager, & staff,

On behalf of the Building Industry Association of Clark County (BIA) and our more than 700 business members, we would like to thank you for the opportunity to share our comments relating to the proposed Climate Resiliency Plan and associated Public Participation Plan which is planned for the 2025 Comprehensive Plan Update.

Most immediately, one of our top concerns with integrating the requirements of new legislation in this planning cycle is feasibility. The Growth Management Act is very complex legislation that has been made even more complicated by the passing of HB 1220 and HB 1181. With the 2025 Comprehensive Plan Update well underway, the addition of these new bills will certainly bog down the already arduous process. This begs the question, is it reasonable and/or possible to require planning counties to pivot at the halfway point in the planning process to implement new legislation? While that is a conversation for our state legislators, it is worth considering at the county level as well.

Specifically, with concern to HB 1181, early assessments raise concerns that the requirements of this legislation will once again increase the cost of housing in Clark County. At a time when only 15 percent of Clark County residents can afford to purchase a home at the median sale price and with each increase of \$1000 to that sale price 571 households (in the Metro area) are priced out of the home market, we must weigh our decisions carefully. When you add higher interest rates to the conversation, the American dream of homeownership is becoming a non-reality for working-class households. Our decisions around HB 1181 will have an impact on homeownership, the best-known pathway to building generational wealth. This must be considered when we are prioritizing diversity, equity, and inclusion in our policies.

In September 2023, JLA Consulting hosted focus groups to gather feedback and recommendations for forming advisory committees to shape the Public Participation Plan for climate resiliency component for the 2025 Comprehensive Plan. The development community was represented by BIA, SWCA, members of DEAB, and various development professionals.

The recommendations from the development community were clear- early, often, and collaborative communication would produce optimal outcomes and implementable solutions. The BIA strongly urged that there be cross collaboration and representation from group to group to avoid siloed and potentially conflicting solutions.

We agree that in order to arrive at the broadest solution set we need all voices at the table. We are supportive of establishing all 3 advisory groups: Environmental Justice Coalition, Interdepartmental and Interagency Coordinating Team, and the Community Advisory Group.

We urge the Council to create a subset of all three groups. This subset would act as ambassadors between each of the three groups and be a resource of firsthand information for the Council. It would be the ambassador team's job to attend each groups' meeting and be a resource to provide firsthand knowledge of the solutions that are being recommended by the other groups. The objective would be to bridge gaps and arrive at solutions that are collaborative, cohesive, and address our community's priorities.

When JLA's findings and recommendations were published, the BIA found the following deficiencies:

- a. Utility providers (NW Natural and Clark Public Utilities) were omitted from the proposed Community Advisory Group and the Interdepartmental and Interagency Coordinating Team. Utility providers are centric to any conversation regarding climate action and energy as they produce, transmit, deliver, and serve residents/businesses with critical energy. New technologies are emerging in the energy space, and we need Clark County utility companies at the table in both of these work groups.
- b. While homebuilders are included among the targets for the Community Advisory Group, the CAG needs a presence from Realtors (i.e. the Clark County Association of Realtors) and commercial builders (in the form of members of Southwest Washington Contractors Association). We urge Council and staff to add commercial builders and Realtors to the Community Advisory Group.
- c. Labor is missing from the Community Advisory Group. Labor has knowledge which is critical to understanding the current needs of our working-class households but also the types of values and environment that are important for attracting future workforce. We recommend that labor have a seat at the table for this group.

In addition to these deficiencies, we have deep concerns for our working-class households and the challenges they face with affordability. We would ask staff and the consultant to clarify how/if the public participation plan will gather information to understand our community's pain points, priorities, and preferences? Without understanding the community's top concerns, how will we know if our solutions are on target?

We must know how much affordability Clark County households are able sacrifice for the solutions that will come out of the advisory groups. Are we creating a county where our teachers, firefighters, law enforcement officers, and other public servants will need to commute further from more affordable communities? Where does the balance between climate resiliency and affordability impact quality of life for working-class households? These questions must be centric to this conversation to serve and shape our community better.

The BIA is always available for consultation and as a resource for better policy making and implementation. Thank you for your time in advance.

Sincerely,

A handwritten signature in black ink that reads "Noelle Lovern". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Noelle Lovern
Government Affairs Director