



January 16, 2024

Chair Medvigy and Clark County Council
Chair Johnson and Clark County Planning Commissioners:

RE: January 2024 workshop review of local growth allocations and estimated capacities for the Clark County Comprehensive Plan Update

Councilors and Commissioners:

Thank you for the opportunity to comment. The City of Vancouver appreciates the opportunity to share our perspectives on upcoming decisions related to job and housing allocations and capacities that will have significant impacts for all Clark County jurisdictions. This letter outlines the following recommendations:

- **Please postpone the February 6 hearing on growth allocations until there is adequate time for technical follow up to the newly released Issue Paper 5, and for jurisdictions to consider and discuss the allocation**
- **Consider and begin planning for implications of the allocation and capacity estimate choices, particularly the need to upzone for housing in the existing Vancouver UGA as well the City of Vancouver, as acknowledged by the Issue Paper**
- **Continue to improve the residential side of the VBLM model by updating current assumptions that are inconsistent with state guidance**
- **Fix the worsening employment side of the VBLM model by adding assumptions to account for common sense omissions never considered or voted on by the BLPAC advisory committee**

The current Comprehensive Plan update cycle as you know is subject to an unprecedented slate of new laws requiring local jurisdictions to now plan for and accommodate pre-set numbers of housing units in set income affordability segments, to allow two ADUs on single family lots, to calibrate impact fees by housing size to lower fees on smaller units, and to make other changes.

The cities of Vancouver, Camas and Washougal and any lands they annex during the planning period must allow 4-6 unit developments on single family lots. The Department of Commerce now lists 32 [new laws](#) adopted since 2019 for housing alone. Climate analyses and planning is also required for the first time to be incorporated in local Comprehensive Plans. This update cycle is unlike any before.

These laws are driven by real concerns around housing access, increasing transportation as well as housing costs facing our citizens, climate, equity and other issues. There is also a finite and diminishing amount of overall land in Clark County to address these issues, both in this update cycle and in future cycles to come. In our view this Comprehensive Plan update provides opportunities, in addition to challenges, to smartly and cost-effectively plan for our future by looking for opportunities to increase the range of housing choices in our communities with more lower cost options, and to generally locate housing, jobs and services nearer to each other, and plan for the economy of today and tomorrow. This update provides an opportunity for fresh thinking, and not just a continuation from the past, including mistakes we have all made.

Taking the time this winter to get the numerical base of our growth planning right will be key. In our view this involves not just getting to the point where we have reasonably accurate estimates of the capacity for housing and employment in our communities for the next 20 years, but also allocating future growth targets to jurisdictions in a way that makes as much sense for all as we can, given the circumstances. Different communities will have differing approaches to meeting our obligations,

As you begin your review, we would ask that you consider the following:

The new draft growth allocations are a reasonable start, but time is needed for technical updates to Issue Paper 5, and for cities to consider and discuss the allocations which will shape their futures. The Issue Paper and its draft jobs allocation was received just days ago, and the housing allocation just the week before. The allocation of total housing units appears to vary widely, with some jurisdictions receiving far more than their currently estimated capacities, and others less than their capacity. The distribution of lower income units appears not to recognize a jurisdiction's existing low income stock. Some detail needs fleshing out, as specific growth allocations to the small cities as opposed to their UGAs aren't provided in the tables, and the specific housing allocation to the Vancouver UGA as opposed to the rural area isn't provided. The employment allocation table shows long term job capacity estimates which are significantly lower than they were just months ago for most jurisdictions and may not be accurate. The population allocation table lists the City of Vancouver's April 1, 2023 population as several thousand persons less than OFM's official estimate. These issues can be resolved but more time is needed.

More time is also needed for cities to absorb the new information, and from conversations last week it's also clear that different jurisdictions have different growth policy preferences, so that some trading between allocations may be beneficial to all. For example, in order to address our housing shortage in the City of Vancouver we have concluded we will need to accommodate

around 38,000 more units than currently exist, and have begun planning accordingly. Increasing our allocation to this amount can relieve part of the burden on other cities or the unincorporated areas which may have different circumstance or objectives.

Significant zoning map changes will likely be required in existing urban areas, particularly in the City of Vancouver and the Vancouver UGA. Table 5 of the Issue Paper shows that over 100,000 new housing units are required to be accommodated countywide, more than half of these at low, very low, and extremely low income levels. The Issue Paper rightly concludes that *“this will require a significant increase in land allocation for multi-family housing.”*

Because of their size the City of Vancouver and Vancouver UGA will need to take on most but not all of the countywide burden. The City has developed a great deal of multi-family housing in recent years but will be looking for selective opportunities at key development nodes to provide options for more in this update. In the unincorporated VUGA, the lack of land for multi-family housing has been well documented by the HOSAP work, and upzoning where appropriate was recommended as a high priority action by the HOSAP Advisory Committee in 2021, but this has not been followed up on.

In past local Comprehensive Plan updates when additional growth capacity was needed, large UGA expansions of multiple square miles for predominantly large single family lots were adopted, with little change to capacity in existing urban areas. That did not improve local housing affordability¹, and the same approach now would likely not meet current legal requirements. Locating all or most of the newly required low-income housing at the very edge of the VUGA far from existing public, commercial, and social services does not make sense from cost, climate, equity or access perspective in our view. Large scale UGA expansions may also be difficult to justify under new climate laws, as they would likely result in more extensive transportation-related GHG emissions compared with other options. Much of the upzoning will likely need to occur in existing areas.

The extent of zoning map changes needed in our communities will depend in part on how accurately we recognize the capacity of existing lands to accommodate development or redevelopment for the next 20 years. On the residential side of the VBLM model, important improvements have been made but more work remains. We greatly appreciate the extensive work of County GIS and planning staff in recent months to respond to new GMA requirements to estimate densities by zone, as well as long standing requirements that Comprehensive Plan capacity analyses be forward looking, as opposed to Buildable Lands Reports which are intended to look backwards.² The need to include newly adopted laws in the capacity analysis

¹ After adoption of the largest UGA boundary expansions in state history in 2004 and 2007, Clark County housing prices increase twice as fast as statewide until the next update in 2016 - 16% vs 8%, from 2008Q1 to 2016Q2 per Washington Center for Real Estate Research Housing Market Reports [Reports and Resources](#) | (uw.edu). 2007 reports were not available.

² [State Buildable Land Guidance](#), pages 13-14

has been acknowledged by parties on all sides of the VBLM debate, and the residential model is now beginning to do this, at least in the City of Vancouver and VUGA.

VBLM residential results look more consistent with observed development activity than past estimates, but still don't appear fully accurate. The VBLM as of this writing estimates the City of Vancouver has capacity through 2045 for about twice as many housing units as are currently included in land use and building permit applications under review, but this is very likely low as most applications will be developed in 2-4 years in our experience. The continued residential undercount is likely driven by three VBLM model assumptions which were all adopted by the previous Council in 2022 before most new laws and the latest development data was available, and appear inconsistent with state guidance:

- **The VBLM on-site infrastructure deduction is based on single family development data 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.”* Rather than an oversized, one-size-fits-all assumption, a second and significantly smaller deduction should be applied to zones allowing multi-family development.
- **The VBLM critical lands deduction is similarly based on single family development data only, with no accounting for multi-family development that occurs on larger lots with landscaping requirements that allow for more flexible accommodation of critical areas with fewer deductions.** This also inconsistent with state guidance against using traditional greenfield analyses, and we similarly request using a separate smaller critical lands deduction in multifamily zones to address this issue.
- **The VBLM residential redevelopment assumption is that future redevelopment will occur more slowly than it has in the recent past, despite new housing laws requiring all jurisdictions to allow two ADUs per lot, and the cities of Vancouver, Camas and Washougal to allow 4-6 units per lot in all low-density residential zones.** This also appears inconsistent with the state guidance cited above which calls for an “increasing” need to consider urban dynamics rather than greenfield development patterns. An updated redevelopment assumption should be used that is modestly higher, not lower, than past history.
- **The VBLM has no assumption to account for annexation, despite GMA’s general presumption that UGAs will be annexed during the planning period.** This was not part of the 2022 review, but has become particularly inaccurate recently under new housing laws. HB 1110 effectively turns any single-family residential land annexed in to the cities of Vancouver, Camas or Washougal into a significant residential upzone, as these cities are required to allow 4-6 unit developments on all single family lots. City staff has provided a way of incorporating an assumed gradual, 20-year annexation timeline into the VBLM for Vancouver but it has not been incorporated. We request that this be done before finalizing the model.

While there may be a procedural hesitancy to change assumptions adopted by the prior Council in 2022, we note that Issue Paper 5 itself does just that, by using a 95/5 urban-rural population split rather than the Council's adopted 90/10 figure. Other reasonable adjustments as outlined in this letter should also be made.

The employment side of the VBLM model has noticeably worsened. Job capacity estimates have significantly and inexplicably dropped in recent months for almost all jurisdictions, and appear to significantly underestimate actual capacity. Issue Paper 5 as of this writing estimates there is capacity for 59,130 jobs countywide and 13,017 jobs in the City of Vancouver, a reduction in capacity of over 10,000 jobs countywide and 6,000 jobs in the City compared to VBLM estimates of just six months ago. This is too large a decline to attribute just to development occurring in the past six months. Going forward the VBLM now estimates the City of Vancouver has room to add only around 600 jobs per year during the upcoming planning period, whereas actual growth in current Vancouver city limits averaged about 1,500 jobs per year during the preceding decades according to the U.S Census [On The Map](#) tool, even with a recession and a pandemic during that time.

This employment undercount may be driven in part by recent VBLM changes which appropriately recognize the increased housing that is occurring on non-residentially zoned lands, but appear to have inappropriately assumed commercial and mixed use lands developed for housing cannot also accommodate employment. In Vancouver housing is typically only allowed on non-residential lands when it is part of mixed-use development, in which both employment and housing are located in the same building or in close proximity on the same site. City staff submitted updated split assumptions last week to address this issue and we request that they be incorporated. The purpose of mixed-use zones – which in the City of Vancouver include all our commercial zones as well as those with mixed use in their name- is to mix housing and commercial services.

The employment undercount is also likely driven by the lack of VBLM assumptions in three areas whose absence does not pass a basic common-sense test in our view:

- The VBLM assumes there will be no home-based work countywide despite work at home trends enabled by technology and accelerated by the pandemic.
- The VBLM does not account for jobs on rural or resource lands, or within rural commercial centers.
- The VBLM assumes virtually no jobs will occur through redevelopment of existing buildings countywide, or adding employees in existing buildings, even vacant ones.

These were never taken up one way or another by the Buildable Lands Project Advisory Committee and we recommend they be considered now.

We are optimistic that given some time technical issues with the initial draft allocations can be properly addressed. Thanks to the good work of County staff the VBLM model has significantly


improved on the residential side, although work remains to be done to make it fully accurate. Focus can now turn to the employment side of the model where it is most needed.

If the residential and employment sides of the VBLM model can be brought to reasonable accuracy and fully recognize existing capacities already in place in our communities to accommodate growth over the next 20 years, we believe the degree of rezoning needed to expand those capacities is workable, with the acknowledgement that we will all face challenges in accommodating the required lower income housing. This will look different in different communities that have different histories and capacities. The City of Vancouver is willing to take on a greater share of the housing burden than indicated in the Issue Paper 5 draft allocation to accommodate the approximately 38,000 new units we need to address our existing housing deficit and future growth.

With a solid technical foundation this process and our individual City Comprehensive Plans can begin to develop realistic land use alternatives to engage our communities, and respond to the very significant housing, climate, and other issues we are all facing. Recognizing the limited time involved, we have sponsored legislation this past week which would extend the GMA adoption deadline by six months to December 2025, similar to the extension granted last year to King County jurisdictions. We hope this gains full local community support, and that you will take the time that is needed to develop allocations and capacity estimates that are reasonably accurate, respond to state guidance, and support thriving Southwest Washington communities for generations to come.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Erik Paulsen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Erik Paulsen, Vancouver City Councilmember