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**To:** [Sonja Wiser](#)  
**Cc:** [James D. Howsley](#); [Ezra L. Hammer](#)  
**Subject:** LT Clark County re UGA 4853-4305-9619 v.1  
**Date:** Tuesday, February 27, 2024 3:56:56 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[LT Clark County re UGA 4853-4305-9619 v.1.pdf](#)

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Sonja,

Would you please be sure that the PC also sees the public comment we sent on February 5<sup>th</sup> the County Council for the hearing on Thursday. I just looked at the public comments received and did not see it there and want to make sure they have read it.

Best,

Jamie

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February 5, 2024

VIA EMAIL ONLY

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Re: ***Clark County Population, Housing, and Employment Allocation***

Dear Chair Medvigy and Councilors,

Jordan Ramis PC represents a number of property owners who are supportive of Clark County's (the "County") ongoing planning efforts and are enthusiastic about bringing much needed housing and jobs to the County and its various cities in order to ensure that our region remains an optimal place to live, work, and play. We thank you for the opportunity to share our thoughts on the current housing allocation process.

Allocating housing units and directing future residential growth is one of the most important steps that the County will take as part of its 2025 Comprehensive Plan update. It will set the baseline for how Clark County will succeed – or fail – at accommodating the historic growth we are experiencing and will likely continue to see. Clark County continues to be extremely attractive for those seeking a safe, beautiful, and economically vibrant place to live and raise their families. As such, we must ensure that the County's housing allotment is consistent both with the new state guidelines and our actual need and capacity.

County staff has done an incredible job wading through the difficult process of developing the Vacant Buildable Lands Model (“VBLM”) and working with cities to identify their current capacity for both residential and jobs growth. Based on our understanding of the conversations to date, we anticipate that the cities will support the staff recommended VBLM, which will pave the way for a smooth process for adoption of the 2025 Comprehensive Plan. We congratulate County staff on accomplishing this challenging and important step.

The framework for housing allocation has dramatically shifted in recent years. In 2021, the Washington Legislature changed the way counties are required to plan for housing. House Bill 1220 (2021) amended the Growth Management Act (“GMA”) to instruct local governments to “plan for and accommodate” housing that is affordable at all income levels. This was meant to significantly strengthen the previous goal, which was merely to encourage affordable housing.

HB 1220 also directed the Department of Commerce to project future housing needs for jurisdictions by income bracket and made updates to how jurisdictions should plan for housing in the housing element of their comprehensive plans. As part of this process, the Department of Commerce prepared a guidance tool to help assist counties in crafting their local housing allotments. This tool is called the Housing for All Planning Tool (“HAPT”).

The HAPT is a statewide tool that has not been refined for particularized allotments in Clark County. It merely takes a county’s current population, breaks it up into economic quadrants, and then extrapolates out these quadrants based on the county’s future growth number which, in the case of Clark County, is 718,154. Surprisingly, the HAPT uses each jurisdiction’s VBLM capacity to allot future growth. It does not consider past growth or other economic factors that might drive future growth. Because each city has wildly different amounts of vacant and developable land, each one’s growth numbers vary. As seen below in *Table 1*, the HAPT indicates that La Center will nearly double in size, while Vancouver and Camas will merely grow by one third.

**Table 1**

City	Current Population	DRAFT VBLM Population Allocation	Growth Rate	2045 Population Estimate
Battle Ground	24,444	15,440	63%	39,884
Camas	29,352	8,553	29%	37,905
La Center	4,462	4,331	97%	8,793
Ridgefield	16,574	11,580	70%	28,154
Vancouver - City	195,992	55,470	28%	251,462
Vancouver - UGA	167,360	78,666	47%	246,026
Washougal	18,026	6,687	37%	24,713
Woodland	145	199	137%	344
Yacolt	1,762	290	16%	2,052
<b>Total</b>	<b>458,117</b>	<b>181,216</b>		<b>639,333</b>

Following this initial housing allocation, the HAPT then breaks down the future population and associated housing need in each jurisdiction in two different ways. In Option A, the model merely extrapolates out the economic segments based on the existing population and future growth numbers. This leads to the numbers shown in *Table 2* below, which were presented at the January 17<sup>th</sup> County Council Work Session.

**Table 2**

## Projected Housing Units by UGA and Income Band

Population Target=718,154		Permanent Housing Needs by Income Level (% of Area Median Income)					
		<80%		>80 - 120%		>120%	
	Total						
Vancouver Unincorporated + Rural Clark County	46,850	24,109	51%	8,760	19%	13,981	30%
Battle Ground city	9,362	4,733	51%	1,720	18%	2,909	31%
Camas city	4,862	2,622	54%	953	20%	1,287	26%
La Center city	2,562	1,327	52%	482	19%	752	29%
Ridgefield city	5,329	3,550	67%	1,290	24%	489	9%
Vancouver city	30,348	17,004	56%	6,179	20%	7,166	24%
Washougal city	4,059	2,050	51%	745	18%	1,264	31%
Woodland city	128	61	48%	22	17%	45	35%
Yacolt town	197	95	48%	34	17%	68	35%
<b>Total 2023-2045</b>	<b>103,697</b>	<b>55,550</b>		<b>20,185</b>		<b>27,962</b>	
<b>Percent of Total</b>		<b>54%</b>		<b>19%</b>		<b>27%</b>	

The HAPT also provides for Option B, which shows the breakdown in economic segments if the various segments were normalized across each jurisdiction within Clark County. However, since each jurisdiction has unique populations and economic bands (some cities have more affluent populations than others). Option B effectively engages in a social engineering exercise that dramatically reapportions populations on a countywide basis. We see this odd outcome in *Table 3* below, which staff also presented at the January 17<sup>th</sup> work session.

**Table 3**

## Projected Housing Units by UGA and Income Band

Population Target=718,154		Permanent Housing Needs by Income Level (% of Area Median Income)					
	Total	<80%		>80 - 120%		>120%	
Vancouver Unincorporated + Rural Clark County	46,850	32,254	69%	6,674	14%	7,922	17%
Battle Ground city	9,362	4,319	46%	2,203	24%	2,840	30%
Camas city	4,862	4,050	83%	996	20%	-183	-4%
La Center city	2,562	1,430	56%	669	26%	463	18%
Ridgefield city	5,329	4,273	80%	1,517	28%	-462	-9%
Vancouver city	30,348	6,991	23%	7,147	24%	16,211	53%
Washougal city	4,059	2,184	54%	883	22%	991	24%
Woodland city	128	55	43%	33	26%	40	31%
Yacolt town	197	-6	-3%	62	32%	141	72%
<b>Total 2023-2045</b>	<b>103,697</b>	<b>55,550</b>		<b>20,185</b>		<b>27,962</b>	
<b>Percent of Total</b>		<b>54%</b>		<b>19%</b>		<b>27%</b>	

Option B says that neither Camas nor Ridgefield are justified in adding new housing for people making over 120% of the Area Medium Income (“AMI”). The AMI was \$106,500 in 2022 for a family of four with two working adults. This means that, under Option B, neither city would be justified in planning to accommodate new housing for any adults making more than \$53,250 per year. Rather, they would both need to plan almost exclusively for those making less than 80% of the AMI. Absent refinement, this is precisely what the County would be saying if it adopted Option B.

Choosing Option B has tremendous implications. County staff has indicated at the Planning Commission that the only way the County can determine whether a city is planning for the appropriate segment is through the zoning process. Additionally, based on the Department of Commerce Guidance, County staff are indicating that they will direct cities to overlay housing typologies over economic segments as shown in *Table 4* below.

**Table 4**

Future housing needs broken down by area median income (AMI) groups

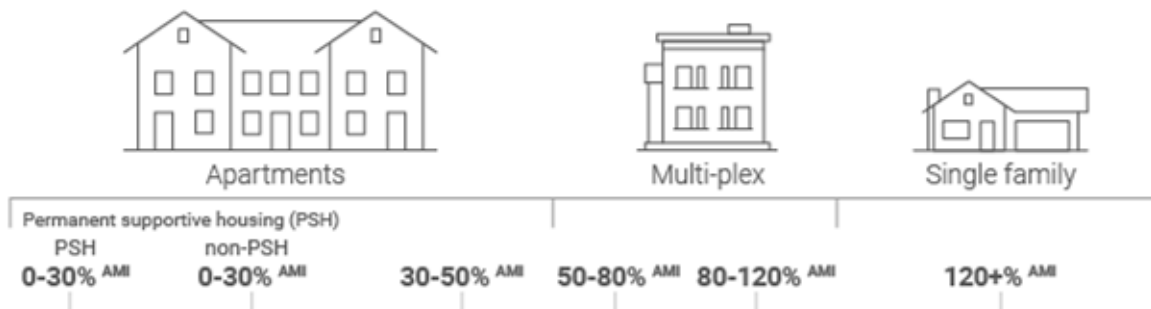


Table 4 is extremely prescriptive and effectively says that those making less than 50% of AMI can only live in apartments, those making 50-120% of AMI can only live in “multi-plexes” (understood to mean townhomes, duplexes, triplexes, and quad-plexes), and those making at or above 120% AMI can only live in single family homes. These assumptions leave no room for flexibility, and indicate that no family making less than approximately \$120,000 should live in a single family home and no family making more than that should live in either a townhome or apartment. Putting aside the fact that the assumptions are unduly dictatorial, these requirements mean that under Option B, neither Camas nor Ridgefield would be justified in planning for any new single family homes over the next 20 years.

This prohibition that stems from the adoption of Option B runs completely contrary to both the desires of the local cities and the collaborative process that Clark County has utilized in the past when allocating housing growth. Never before has Clark County told a city that they are prohibited from planning for a particularized housing typology. We strongly caution the County from doing so now.

In recognition of the fact that HAPT was not designed for particularized use, the state granted a high level of flexibility in using it to finalize housing allotments. Not only does it provide for Option A and Option B, but it also allows for counties to further iterate and refine their allotment methodology as desired. As stated in the HAPT, “If the [county] wishes to make additional refinements to the



allocations provided by Method A or Method B ... they can make manual adjustments as needed.” It is the responsibility of counties to work in collaboration with their cities to ensure the final allocations sum to the countywide housing total over the 20 year planning period. Essentially, the state recognizes that the HAPT is not a one-size fits all tool, and particularized refinement is necessary to ensure that the housing allocation is appropriate and fair to each city.

County staff indicated at the January 17, 2024, Planning Commission work session that they plan to recommend that County Council adopt the current housing allotment and Option B as the preferred methodologies. Absent refinement, doing so would be a tremendous mistake.

First, the current housing allotment is completely divorced from historic growth or other key factors such as jobs, livability, access to open space, schools, etc. It makes little sense to merely look at the current VBLM capacity when determining future allotment. Doing so forces the cities to grow at wildly different rates and places a significant amount of growth to the northern edge of Clark County, which will lead to dramatically increased traffic along the I-5 corridor. Under the current allotment methodology, La Center must plan for growth at a rate three times greater than that of Vancouver and Ridgefield. This simply does not make sense and deserves a second look.

Second, Option B would serve as a draconian step and bar any future planning for single family homes in two of Clark County’s highly desirable communities. Importantly, neither city is in accord with such an action. This means that if the County adopts Option B without refinement, it risks violating both GMA Goal 4 and creating a serious breach with Clark County cities.

For these reasons, we respectfully request that the Council refrain from moving forward with either the housing allocation or the adoption of Option B. We further request that the Council direct staff to refine the allocation methodology and better normalize the growth rate across the various jurisdictions. Additionally, the Council should either adopt Option A, which refrains from the incredible social engineering captured in Option B, or refine Option B to ensure that it does not prohibit or unreasonably restrict planning for single family homes over the next 20 years.

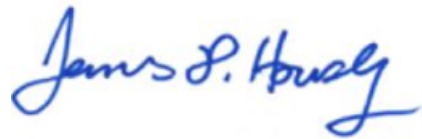


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Thank you for considering our requests and we look forward to continued dialogue on these important issues.

Very truly yours,

JORDAN RAMIS PC



Jamie D. Howsley  
Admitted in Oregon and Washington

cc: Christine Cook, Clark County  
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Jose Alvarez, Clark County  
Ezra Hammer, Jordan Ramis PC  
Clients