

From: [Noelle Lovern](#)
To: [Karl Johnson](#); [Jack Harroun](#); [Steve Morasch](#); [Bryan Halbert](#); [Gary Medvigy](#); [Glen Yung](#); [Sue Marshall](#); [Michelle Belkot](#); [Karen Bowerman](#)
Cc: [Sonja Wisner](#); [Kathleen Otto](#); shorenstein@schwabe.com
Subject: NW Partners Public Comment - Population & Employment Allocation
Date: Tuesday, February 27, 2024 2:55:00 PM
Attachments: [image001.png](#)
[Comp Plan Memo 02-27-2024.pdf](#)

EXTERNAL: 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.

Good afternoon, Planning Commissioners, County Council, and staff.

Thank you for the opportunity to weigh in on this important topic, the Population & Employment Allocation.

Please see the attached public comment from NW Partners Comprehensive Plan Taskforce for the Planning Commission Public Hearing scheduled for February 29, 2024. We would like to note that the data and materials prepared by Community Planning have been modified/revised leading up to the public hearing. It may be helpful to hear from staff regarding the updated reports/data, prior to convening/finalizing the public hearing to ensure that all comments are addressing the most current information.

At this time, based on the various models offered by County staff, Method A appears to have the most flexibility which aligns with the County's stated consideration and the need for flexible solutions in our community. Our preliminary comment, attached, favors the most flexible methodology.

Our comment also express concern regarding the Employment Allocation. The Employment Allocation has shifted from needing land for more than 20,000 jobs to having a surplus of land for jobs. It is particularly concerning that private sector jobs that do not occur on public lands have been lumped together with government jobs that do occur on public lands. It would better inform our comment and the decision-making process if staff provided clarification on this change.

As I believe is your process, please distribute this to all members of the Commission on our behalf.

Thank you,

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

Address: 103 E 29th St., Vancouver, WA 98663
Phone: (208)602-3423 **Web:** www.biaofclarkcounty.org

[Facebook](#) | [LinkedIn](#) | [Instagram](#) | [Pinterest](#) | [Members Group](#)

Join our email list for weekly industry updates > [CLICK HERE](#)





Memorandum

To: Clark County Council
CC: Clark County Planning Commission
From: NW Partners for a Stronger Community
Date: February 27, 2024
Subject: 2025 Comprehensive Plan Update – Population & Employment Allocation

The 2025 Comprehensive Plan Update attempts to envision how Clark County will develop over the next 20 years. It is a required Growth Management Act exercise that will plot our course for two decades.

To plan the course of development that will grow Clark County through 2045, we must begin with a vision of what we want our community to be like in the future. Clark County has long been a community that offered livability coupled with affordability. If Clark County hopes to continue to be a place where our teachers, police officers, nurses, and fireman can afford to own a home near their places of work, we must carefully weigh our Comprehensive Plan choices.

Throughout the past year, we have been working through the various Comprehensive Plan building blocks. First, the County Council approved the population forecast at 718,154 based on ranges recommend by the Office of Financial Management. Next, the County Council selected the jobs to household ratio (1:1) and people per household number (2.66). In 2023 State Legislature passed HB 1220 which added another layer to the calculations by requiring that each urban growth area “plan and accommodate” housing types for each income band from 0% AMI to 120+% AMI. The mathematical equation continues to grow in complexity.

While the math is becoming more complex, we must not ignore the objective of collecting, reporting, and analyzing the data. The Comprehensive Plan aims to answer the question “how will we as a community responsibly accommodate our population growth?” A thriving community with a sustainable economy recognizes the symbiotic relationship between jobs and housing. We need land for jobs and land for housing to be a stable, healthy community.

NW Partners Comprehensive Plan Taskforce offers these recommendations for the Population and Employment Allocation associated with the 2025 Comprehensive Plan Update.

- 1) To align with the County’s stated consideration to “allow for flexibility” (slide 7- Feb. 29 Population Allocation presentation), we recommend further analysis of each Method included in the January 17, 2024, presentation. The Housing for All Planning Tool (HAPT) is not intended to produce a single prescriptive plan but is designed to provide flexibility and allow for additional refinements as needed. Narrowing the focus to either Method A or B prior to the public hearing is removing consideration of the flexibility needed for an optimal Comprehensive Plan outcome.
- 2) The Population and Employment Allocation presentation on January 17 reported a shortage of land to support nearly 30,000 jobs. The pending Planning Commission presentation slated for February 29 asserts that Clark County has a surplus of land for jobs. It is evident to those of us who work to create jobs in our community that we are significantly short of land for new and expanding employment. We urge further investigation of this pendulum shift.

Method A for More Flexibility

HB 1220 requires counties to plan for and accommodate housing accessible to those at every rung of the economic ladder. This means that Clark County must analyze the needs of various income segments and articulate these housing needs as part of the 2025 Comprehensive Plan Update process. There are various ways to accomplish this. Despite this, County staff have made a series of prescriptive choices that, when added together, produce a restrictive proposal that undermines the ability of cities to plan for their own future.

The work produced by staff asserts that there are two ways for the County to conform with HB 1220: Method A or Method B. This modeling assumes that everyone in designated income segments will live in a specific housing type. For instance, people making more than 120% of AMI will only live in single family homes, those making between 80-120% of AMI will only live in townhomes and other attached housing, and those making less than 80% of AMI will only live in apartments.

This assumption completely ignores critical factors such as personal preferences, location of the housing within the County, the positive impact that new housing – of all types – has on the overall housing market, and other factors. Second, current modeling assumes that it is possible, desirable, and actually feasible, for each jurisdiction within Clark County to have the exact same economic segment distributions (i.e. both Camas and La Center will have identical percentages of high-income earners). This assumption completely ignores features such as community amenities, topography, development costs, schools, commute patterns, general desirability, and a whole host of other factors that families consider when finding a home.

On January 17, 2024, county staff presented two methodologies for allocating population and housing growth to the various jurisdictions, Method A & Method B. Importantly, the Department

of Commerce states that both methodologies equally comply with HB 1220. Method A provides the various jurisdictions with a high level of flexibility when planning for future growth. Method B does not.

Adopting Method B would have serious consequences for Clark County. First, it would upend decades of planning collaboration between the County and cities and have the County play a preeminent role in local zoning. Second, it would tell the cities of Ridgefield and Camas that they can no longer plan for any new single-family dwellings over the next twenty years. Certainly, the cities are far better positioned to properly plan for their future. As such, we strongly recommend that you adopt Method A and leave planning truly at the most local level.

NW Partners Comprehensive Plan Taskforce urges continued collaboration with the business/development community:

- 1) To determine how/if the market demand will support these housing product types.
- 2) Collaborate with the business and development industries to create an incentivized environment that may facilitate new approaches to developing products for 80% AMI and below.

Land for Jobs Demands Strategic Expansion

The January 17 presentation showed the need for jobs at 79,500. This does not include 8,600 government jobs which are assumed to occur on public land or in existing government facilities which are not included in the Vacant Buildable Lands Model. The capacity reported in the January 17 presentation showed land for 59,130 jobs. Doing the math, the January report indicated a shortage of land for more than 20,000 jobs.

Fast forward to the pending February 29 presentation prepared for Clark County Planning Commission, the new modeling has lumped construction, work from home, and rural jobs in with government jobs to reduce the need by another 14,429 jobs and underpin the assertion that no additional land is needed. The government jobs category was segmented as this type of employment occurs on land that is not considered capacity in the Vacant Buildable Lands Model. We urge the Council to seek clarification regarding the segmenting of construction, work from home, and rural jobs in the government jobs category when they do not always occur on public land or in existing facilities.

The data prepared for the February 29 presentation is now reporting the need for 65,071 jobs and capacity for 65,091 jobs, a surplus of 20 jobs. Before the current model is approved it is crucial to determine why the numbers are shifting so dramatically and where land for the additional jobs has been located. Further it should be explored if the land is in fact feasible, marketable, and attractive for job creation purposes.

The lack of capacity for commercial and industrial development has deterred many job creators from pursuing operations in Clark County throughout the recent past. Ignoring the need for strategic expansion to increase capacity will diminish Clark County's economic development potential and further deter potential employers from establishing operations.

Conclusion

It appears from the Population & Employment Allocation modeling that County staff believe we have enough land within the UGA to sustain our growth for housing and jobs through 2045. Growth Management Planning aims to project growth trends and develop approaches for responsibly managing growth. Lack of planning or inaccurate planning will not stop the growth, it will only make it more burdensome for our community, our residents, and our infrastructure. We have got to get this right.

NW Partners for a Stronger Community