

From: [Alan Peters](#)
To: [Sonja Wisler](#); [Rebecca Messinger](#)
Cc: [Jose Alvarez](#); oliver.orjako@clark.wa.gov; [Steve Hogan](#); [Doug Quinn](#)
Subject: Planning Commission/County Council Comment Letter
Date: Thursday, February 29, 2024 9:04:37 AM
Attachments: [Clark County_02292024.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.

Please accept the attached letter in regard to the public hearing on Population, Housing and Employment Allocation for Clark County's 2025 Comprehensive Plan Update.

Alan Peters, AICP
Community Development Director
Cell 360-409-1475
Desk 360-817-7254
www.cityofcamas.us | apeters@cityofcamas.us

NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this e-mail, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

February 29, 2024

County Council
Planning Commission
Clark County
1300 Franklin Street
Vancouver, WA 98666

VIA EMAIL

Dear Chair Medvigy, Chair Johnson, County Councilors, and Planning Commissioners,

The 2025 Comprehensive Plan update is perhaps the most significant periodic update cycle ever in Clark County. New GMA planning requirements related to housing needs (including HB 1220, HB 1110, and HB 1337) require careful consideration in the growth allocations assigned to each Clark County jurisdiction to ensure that our regional housing needs over the next 20 years are focused where they are actually feasible. The City of Camas is appreciative of our collaboration with Clark County's Planning staff and the significant work that they have completed on the VLBM leading up to this pivotal moment in the 2025 Comprehensive Plan update process.

HB 1220 requires that all cities plan and accommodate housing affordable to all income levels to meet the projected housing needs for all economic segments of the community. The Department of Commerce has proposed two allocation methods to distribute this need throughout the county. Camas supports the use of "Method A" which assumes that all housing needs are accommodated through new housing production over the next 20 years. Countywide, Method A is most likely to be successful at meeting our region's housing needs together, recognizing that each city plays a unique part in contributing to the county's housing supply. For Camas, Method A means that we will be able to continue to provide a diverse housing stock with significant amounts of multi-family and middle housing while still being able to provide detached single-family units.

"Method B" aspires to make the share of total housing — both new and existing — affordable to households in each income range the same in every jurisdiction, regardless of the unique attributes of each city, a city's prior success (or failure) in achieving affordable housing, or whether this methodology places affordable housing near jobs and transit. Method B results in negative allocations; it effectively means that Camas has already surpassed its needs for detached single-family units and would need to direct all its future growth towards multi-family and middle housing. While Camas has made strides towards accommodating more multi-family and middle housing in recent years, local factors including personal preferences, land values, environmental constraints, and other factors make some housing types less feasible than others in Camas. These local factors may result in underproduction of needed housing if Method B is chosen and Camas is assigned a greater share of multi-family units than the land and market can yield.

Clark County

Page 2

While several counties who share Clark County's 2025 periodic update deadline are still determining population allocations, it is telling that none of the first counties (King, Snohomish, Pierce, and Kitsap) in this update cycle with 2024 deadlines have allocated housing needs based on Method B. Without any compelling reason to utilize Method B, Method A should be the default option. The City of Camas recommends that Clark County allocate housing needs throughout the county using Method A.

Sincerely,

A handwritten signature in black ink that reads "Alan Peters".

Alan Peters, AICP

Community Development Director