

**From:** [Oliver Orjiako](#)  
**To:** [Sonja Wiser](#)  
**Subject:** FW: Land for Employment Memo  
**Date:** Wednesday, March 20, 2024 1:44:35 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Land for Employment Memo Final.pdf](#)

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Hi Sonja:

FYI. Thanks.

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**From:** Horenstein, Stephen W. <SHorenstein@schwabe.com>  
**Sent:** Wednesday, March 20, 2024 1:23 PM  
**To:** jack@jackharrounconstruction.com; Bryan@HalbertConstruction.com; karl\_j\_us@yahoo.com; mbergthold@aol.com; Steve C. Morasch <stevem@landerholm.com>; wogen5@msn.com; jkbaker76@gmail.com  
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**Subject:** Land for Employment Memo

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Planning Commission members,

Attached you will find a memo provided to you in advance of tomorrow night's hearing. This memo addresses concerns over not planning for enough employment lands.

I will attend the hearing, testify and answer any questions you may have.

Best...Steve

**Stephen Horenstein**

Shareholder

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**Schwabe**

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**Sent:** Wednesday, March 20, 2024 1:00 PM  
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**Subject:** RE: Land for Employment Memo.pdf

**Catherine Helle**

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**From:** Horenstein, Stephen W. <[SHorenstein@schwabe.com](mailto:SHorenstein@schwabe.com)>  
**Sent:** Wednesday, March 20, 2024 12:54 PM  
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**Subject:** Land for Employment Memo.pdf

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## Memorandum

VIA EMAIL

**To:** Clark County Planning Commission

**From:** Stephen W. Horenstein

**Date:** March 20, 2024

**Subject:** Land for Employment

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This is to supplement information you receive from Northwest Partners for a Stronger Community (NW Partners) and provides information regarding the need for more land to be designated for employment as part of the 2025 – 2045 update to Clark County’s Comprehensive Growth Management plan.

There are a number of outstanding issues that make it very difficult for decision makers to accurately predict the acreage of land necessary to accommodate the employment projection provided to the Planning Commission for this hearing.

The issues of a) overestimation of employment in mixed-use zones and b) eliminating land for construction employment are just two examples of many variables that have been modeled in various ways by differing groups,, and that have not yet been ground truthed by testing the modeling against what in real life is available.

One such study prepared by MacKay and Sposito shows the probable undercount of potential employment creation due to the presence of wetlands and other critical areas on private property. If the Planning Commission hasn’t had the opportunity to review the study it should request copies.

Another study commissioned by NW Partners previously provided to county staff differs considerably from the County’s modeling of the impact of wetlands in critical areas on the ability to develop land zoned for employment. This study is based on wetland and critical area conversion for actual development projects rather than simply modeling.

Clark County Board of County Councilors has already adopted employment projections for the 2025 – 2045 planning cycle. These projections come from the Department of Employment Security and reflect job growth over the 20-year period of an additional 88,100 jobs. However, staff has since backed out a certain number of jobs for government, construction and rural workers and those that work from home. The net number of land needed for jobs coincidentally and at least on its face means that we actually now have land for 20 more jobs than projected. Where is the

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data behind these adjustments that have taken us from an undersupply of land to just the right amount?

The question is, do we have enough land available to accommodate employment, especially given the pressure on the land supply to create much more housing than has previously been necessary. The answer to this question in our view is not likely and the information and data is not yet available to make this decision. There are several reasons for this:

Where is the data supporting the reduction from a projection of 88,100 jobs as provided above?

There is conflicting information on the availability of net acreage for employment given the lack of agreement on the impact of wetlands and critical areas of the land supply.

It is likely that the number of those employed in mixed-use development is overstated.

Vancouver staff has indicated a willingness to consider converting land zoned for commercial development to housing purposes. If this does occur, how does it affect the land supply for employment?

The numbers set forth in the VBLM are based on a modeling exercise. There has been no sampling or ground truthing the information.

We have recently been provided multiple versions of a chart entitled Employment Capacity and Allocation by UGA. The first of these charts identified a lack of capacity for just under 30,000 employees. The current version of this chart identifies a slight over capacity of land for employment. Where is the data behind these changes (not just conclusory numbers)?

The 2016 GMA plan included a Buildable Land Program to allow local governments to coordinate and analyze land supply to be sure they have enough land for development and the GMA plans are doing with their supposed to do. Was this monitoring conducted in the county and its various cities? If so, how does it play into the information provided in the land for jobs analysis provided in the current VBLM? Where that is annually compiled information?

Where are the sites located that will serve the community's need to create jobs?

Wetlands and critical areas are just one of the components that determines the ability to develop land. Has information been provided on the availability of transportation and other infrastructure improvements (water, sewer, power, storm water management, telecommunications services) to those sites staff considers available for job creation? In prior planning efforts, we have submitted information analyzing land based on readiness to be developed. Has that occurred here?

Information presented to the Planning Commission and Board of County Councilors is based on the Vacant Buildable Lands Model (VBLM) capacity report. This report analyzes what is considered to be vacant and underutilized land by zoning. It uses software logic analysis including

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input from local jurisdictions. It is a macro look at available lands without regard for the ability to develop any particular parcel. How can a model determine if land is underutilized or is being used by its owner for his or her intended purpose and therefore not available for development?

The mapping of land for employment was completed in 2022. Much commercial and industrial development has occurred on vacant sites since then. Some of those sites have been rezoned other uses since that time. For example:

- Hewlett Packard is now developing 60 acres in Section 30
- Killian Pacific Converted 22 acres of commercial to residential
- Panattoni is building a large industrial park on Padden Parkway and is working on other industrial sites in Clark County
- Panattoni has built a large industrial park on 72<sup>nd</sup> Avenue just north and across from Costco
- Stein Beverage is building a 150,000 sf warehouse on 137<sup>th</sup> Avenue near Fourth Plain
- Pac Trust has built an industrial Corporate Park on 78<sup>th</sup> street
- 80 acre Costco commercial center in Ridgefield is under construction

These and other not listed here are large developments that have diminished our land for employment inventory, making the inventory before you inaccurate and in need of more work.

To date the information provided by staff in this GMA planning update is one-dimensional. Getting to an accurate understanding of land available for jobs is a multidimensional process in order to truly obtain any degree of accuracy. The information provided to date is based on a model that only looks at zoning. It makes assumptions without providing back-up data in order for decision makers to properly plan for our community over the next 20 years.

Many questions remain to be asked and many answers must be provided to decision makers. It is time for staff to show its work.

SWH:cjh

cc: Board of County Councilors  
Oliver Orjiako  
Jose Alvarez  
Noelle Lovern  
Justin Wood  
Eric Golemo  
Jamie Howsley  
Ezra Hammer