

From: [Snodgrass, Bryan](#)
To: [Sonja Wiser](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: cities submittal letter for 3/21 Planning Commission public hearing on growth allocations
Date: Wednesday, March 20, 2024 10:56:17 AM
Attachments: [24 03 21 joint cities ltr to CCPC on allocation fnl.docx](#)

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Sonja – Please find the following from the cities for the Planning Commission in advance of tomorrow night’s hearing. Thanks



March 19, 2024

RE: Cities testimony for March 21, 2024 public hearing, in overall support of the proposed housing and jobs growth allocations in Issue Paper 5, with qualifications noted below.

Chair Johnson and Clark County Planning Commissioners:

On behalf of the undersigned cities in Clark County, we thank you for the opportunity to comment, and wish to extend our thanks as well to the County Council and staff for their work in reaching this important point.

Our cities differ in various circumstances, but having been involved in this process since the outset, we wanted to bring forward some key principles we all agree on regarding the growth allocation decisions currently before you:

1. Allocations to individual jurisdictions should be made in consideration of their growth capacities and goals, rather than attempting to have all jurisdictions grow at the same rate. Doing this would create chaos on the ground, with some jurisdictions forced to shrink their longstanding existing UGA boundaries, and others forced to expand their boundaries in a manner they have not envisioned or planned for.
2. The proposed allocations of total housing units and jobs in revised Issue Paper 5 are reasonable, and allow for developing land use scenarios for the upcoming countywide Environmental Impact Statement review process.
3. The sub-allocation of housing units in specific income bands won't make much difference in the countywide mix of housing, but this does matter at the individual jurisdiction level. Method B proposed by County staff was initially discussed among the jurisdictions, and appropriately recognizes the existing stock and affordability levels of housing in individual communities. However, it leaves some jurisdictions with unrealistic targets and even negative housing allocations at certain income levels. An allocation between Methods A and B could be a workable compromise that recognizes

in part what communities have done, while also providing more realistic growth targets without negative allocations.

4. There are 20 months until the Comprehensive Plan update process must be completed, and discussions within individual jurisdictions and the communities they serve is ongoing. Moving forward, the process should strive to accommodate the modest and reasonable UGA expansion goals of the small cities which at this time are primarily but not exclusively focused on jobs, and amount to less than a square mile in total size countywide.

5. Larger expansions than these may extend beyond our ability to fund necessary services, and are not needed to support robust economic and housing futures in our communities. Although the cities all formally supported selection of the OFM medium and most likely long-term population forecast for Clark County to anchor this process as it began a year ago, we acknowledge that a more aggressive local population target of 718,000 persons countywide by 2045 was chosen by the County Council. New state law under HB 1220 ensures that the number of housing units provided to accommodate this population in our communities will be *extremely* aggressive. The countywide employment forecast of 269,000 jobs is tied to the population through an aspirational jobs per household target, ensuring that it also is aggressive. We believe these targets can be accommodated in existing areas already served by infrastructure and services with limited adjustment, and do not support larger expansions.

Thank you again for the opportunity to comment. We look forward to continued collaboration as the process moves forward, including final refinement of the allocation numbers as the process concludes at the end of 2025.

Sincerely,



City of Battle Ground



City of Camas



City of La Center



City of Ridgefield



City of Vancouver



City of Washougal