

From: [Sonja Wiser](#)
To: [Noelle Lovern](#); [Karl Johnson](#); [Steve Morasch](#); [Jack Harroun](#); jkbaker76@gmail.com; [Mark Bergthold](#); [Eldon Wogen](#); [Bryan Halbert](#); [Kathleen Otto](#); [Oliver Orjiako](#); [Gary Medvigy](#); [Karen Bowerman](#); [Glen Yung](#); [Sue Marshall](#); [Michelle Belkot](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Christine Cook](#)
Subject: RE: PUBLIC COMMENT- Population and Employment Allocation
Date: Thursday, March 21, 2024 6:24:00 AM
Attachments: [pop-employ-allocation-land-for-construction-jobs.pdf](#)
[Land for Employment Memo_Final.pdf](#)
[NWPPartners_Population-Employment Allocation CCPC Comment-3_20_FINAL.docx](#)
[image001.png](#)

Received; this will be indexed into the record added to the PC Webpage this morning. Thank you for your comments

From: Noelle Lovern <Noelle@biaofclarkcounty.org>
Sent: Wednesday, March 20, 2024 5:10 PM
To: Karl Johnson <karl_j_us@yahoo.com>; Steve Morasch <stevem@landerholm.com>; Jack Harroun <jack@jackharrounconstruction.com>; jkbaker76@gmail.com; Mark Bergthold <mbergthold@aol.com>; Eldon Wogen <wogen5@msn.com>; Bryan Halbert <Bryan@HalbertConstruction.com>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Sonja Wiser <Sonja.Wiser@clark.wa.gov>
Subject: PUBLIC COMMENT- Population and Employment Allocation

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,

NW Partners Comprehensive Plan Taskforce is submitting the attached documents for the public hearing associated with the 2025 Comprehensive Plan Update-Population and Employment Allocation.

Our coalition of businesses and organizations are making the following recommendations:

1. Of the two Methods offered by staff for the population allocation, we recommend choosing the Method that provides the most flexibility to local jurisdictions. This appears to Method A and has been recommended in the letter from the City of Camas.
2. The data presented for the employment allocation has had multiple revisions in recent weeks and yet more refinement should be required before approval can be recommended. Please consider the points made in the attached comment and those

being submitted by other organizations moving forward.

I have attached our comment, a slide deck that illustrates the need for land for construction jobs, and an additional comment containing more concerns regarding approval of the current plan. We are available to answer any questions you might have at your convenience.

Thank you for your consideration!

Best,

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

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Land Capacity for Construction Jobs





Rotschy, Inc

- Established in 1988
- One of the largest and most reputable excavation companies in southwest Washington
- NE 113th Circle, Vancouver



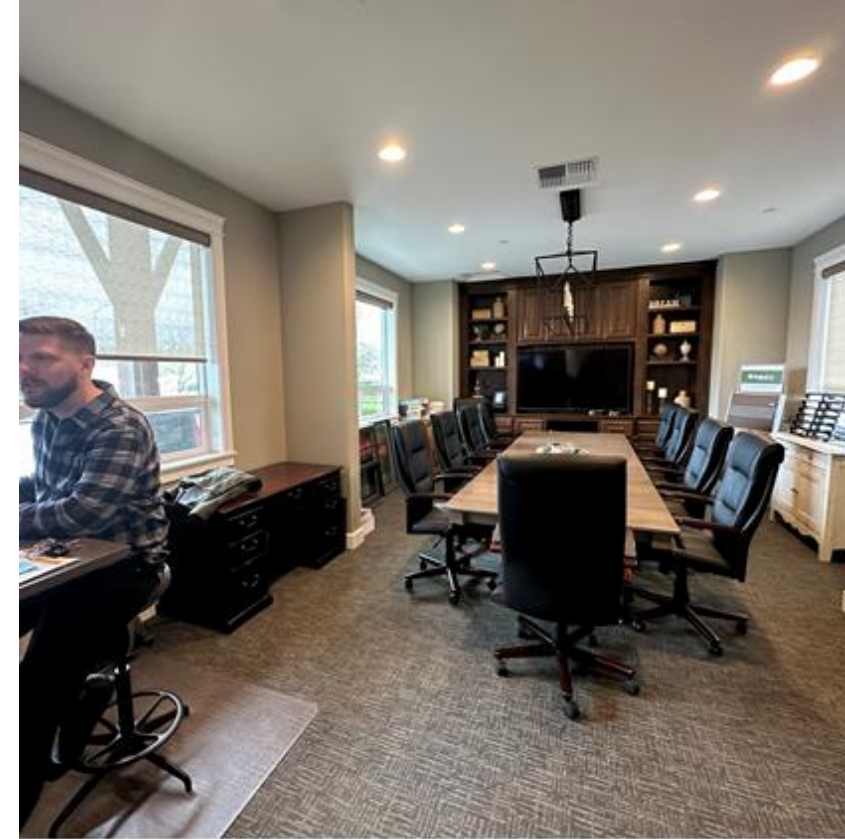
Rotschy, Inc.

- Rotschy develops subdivisions, utilities, and lift stations of all sorts to public roads, highways, and bridges

Cascade West Development

- Cascade West operations is situated on 0.62 acres in Ridgefield, WA.
- Cascade West's building is 3260 sq ft.
- They are a full spectrum builder and developer.





Cascade West Development

- The operations space includes 12 workspaces used by employees weekly.
- There is space set aside for project supers who need space to print documents, full size construction plans, and have meetings.



New Tradition Homes

- New Tradition Homes began in 1987
- Builds new homes of high quality, enduring design and lasting value
- NE 113th Street, Suite 110 Vancouver, WA



Quail Homes

- Builder and developer specializing in empty nesters and multigenerational living
- NE Minnehaha Street

Bridge City Contracting

- A general contracting company specializing first in remodeling and renovation.
- Operations footprint in Battle Ground



Bridge City Contracting

N. Parkway Avenue, Battle
Ground, Washington 98604



Nutter Corporation

- Heavy civil construction
- Serving the Southwest Washington and Portland Metro Area
- From highways, to railroads and site development
- 200 employees working out of Clark County



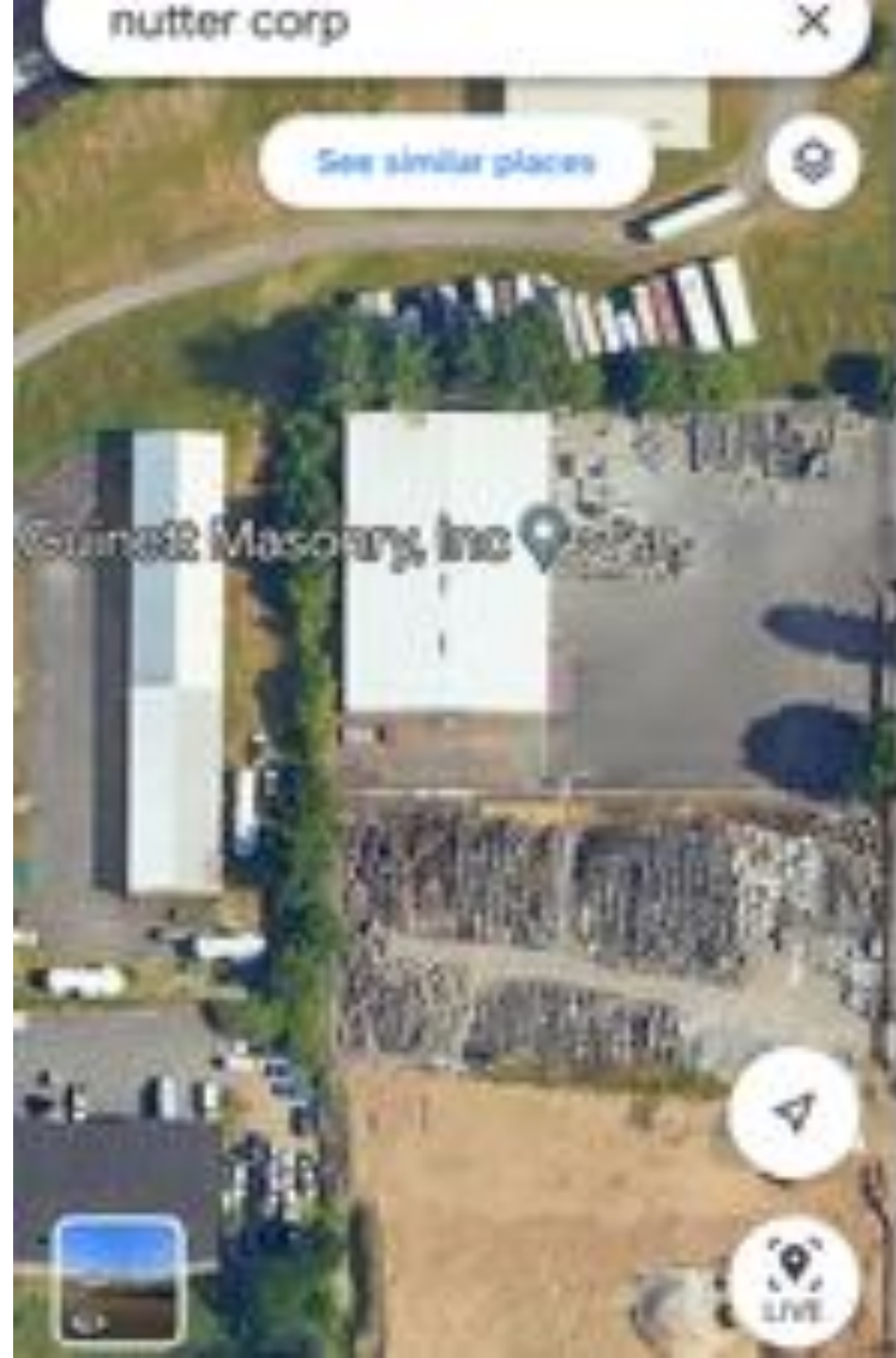
Nutter Corporation

- 11 acres of industrial land
- 18 employees per acre



Guinett Masonry

- 5 acres of industrial land
- 20 employees
- 4 employees per acre





Memorandum

VIA EMAIL

To: Clark County Planning Commission

From: Stephen W. Horenstein

Date: March 20, 2024

Subject: Land for Employment

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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March 20, 2024

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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 72nd Avenue just north and across from Costco
- Stein Beverage is building a 150,000 sf warehouse on 137th Avenue near Fourth Plain
- Pac Trust has built an industrial Corporate Park on 78th 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



Chair Karl Johnson
Clark County Planning Commission
PO Box 5000
Vancouver, WA 98666-5000

Re: Clark County Population and Employment Allocation

Dear Clark County Planning Commission Members,

NW Partners Comprehensive Plan Taskforce is a coalition of organizations that represent a broad swath of the business community in Clark County. Collectively, our members are responsible for creating the critical jobs and housing that allows hundreds of thousands of Washingtonians to call Clark County home.

Determining capacity for housing and jobs to manage future growth are some of the most critical steps in the 2025 Comprehensive Plan update. Housing and jobs are intrinsically interconnected, and the County has the responsibility to plan and accommodate an ample supply of land for both.

NW Partners Taskforce is concerned that the current draft Population and Employment Allocation proposal includes some significant assumptions that – if left unchanged – will greatly diminish the ability of the County and local cities to provide for critically needed housing and jobs.

For the 2025-2045 planning cycle, Washington Department of Commerce (DOC) projects that Clark County will need 103,000 housing units of which 60 percent aims to be products attainable 80% AMI and below. This means our county needs to produce approximately 430 housing units per month to match the need projected by DOC. Alongside housing, Clark County is to plan for an additional 65,071 jobs in the UGA (88,000 county wide).

Below are our collective recommendations for refining the Population & Employment Allocation to ensure a feasible, proactive plan.

1. Provide Cities Maximum Flexibility to Plan Locally - Method A is Best

House Bill 1220 amended the Growth Management Act (GMA) to instruct local governments to “plan for and accommodate” housing that is affordable at all income levels. As part of this process, the Department of Commerce prepared a guidance tool to

help assist counties in crafting their local housing allotments. It is called the Housing for All Planning Tool (HAPT).

The HAPT is a statewide tool that is not refined for the specific needs of Clark County. The HAPT was not designed to produce exact allotments for housing according to income bands. It is a modeling tool that will produce generalized projections that require flexibility and fine tuning to reach a reasonable housing allotment that addresses the needs of each individual community.

County staff used the HAPT to project the housing needed for each jurisdiction in the upcoming 20-year planning cycle. From the various potential outputs of the HAPT, staff has recommended two, Method A and Method B. Below is our analysis of both:

1) Method A provides more flexibility for jurisdictions to address the specific and unique characteristics of their community including population percentages in each economic band. In the case of Ridgefield and Camas, Method A allows a pathway for market demand to continue to shape these communities within the framework of HB 1220. Method A does not place Ridgefield and Camas under unnecessary and unrealistic demands to restrict development to specific housing products regardless of unique market demand specific to each community.

2) Method B effectively restricts local jurisdictions to planning and accommodate growth through a statewide lens without addressing the unique needs and characteristics of their community. Method B indicates that neither Camas nor Ridgefield are justified in adding new housing for people making over 100% of the Area Median Income (AMI).

The restrictive Method B runs contrary to the need for local strategies and the priority for flexibility that Clark County set for the 2025 Comprehensive Plan Update. The letter from the City of Camas must not be ignored. Camas' concerns with adopting the restrictive Method B are valid and should be addressed. We echo the same concerns.

****For these reasons, we ask that the Planning Commission recommend the County Council adopt Method A.**

2. Construction Operations Require Land Capacity – Recommend Allocating Land Capacity for 6500 Construction Jobs

While there are many concerns regarding the employment allocation, we are highlighting a couple of top concerns. Overall, NW Partners Comprehensive Plan Taskforce believes that the Employment Allocation needs significant work prior to approval.

Construction companies require significant land to meet their operational needs. These companies need both administrative spaces to support customer service, sales, accounting, construction meetings, and marketing, as well as indoor and outdoor areas to store equipment and machinery. The County acknowledges the need for land capacity for jobs as it provides guidance in its development code. It discusses multiple construction related uses and their associated development that are either permitted or prohibited in certain zones.

In the most recent iteration of the Population and Employment Allocation staff report, construction jobs were reported to require zero acres in the land capacity. In reviewing previous runs of Vacant Buildable Lands Model, construction jobs have customarily been allocated land capacity. Now, as construction jobs are growing faster than most other sectors in Clark County, it is imperative that adequate land capacity is allocated to keep pace with continued growth.

Please see the attached slide deck that contains images of various construction company’s operations and footprints. We have included a sampling of companies that range for boutique operators to regional corporate campuses.

****For these reasons, we urge the Planning Commission recommend that the County Council approve adequate land for construction companies and direct staff to revise the VBLM analysis to fully account for these jobs.**

3. Over Estimating Jobs for Mixed-Used Projects – Refine Mixed-Use Job Assumptions

As part of the VBLM process, the County reviews each zone in each jurisdiction and applies an expected yield assumption to determine how many jobs or housing units it can accommodate. One especially unique situation is where zones allow for a variety of uses. In these instances, the VBLM assumes that either jobs or housing will occur and applies a likelihood to both (e.g. in the HX zone in Vancouver, 80% of the time housing will occur and 20% of the time jobs will occur).

This exercise becomes particularly challenging when the uses are assumed to occur at the same time. This is the case with mixed-use zoning that encourages – or requires – a commercial component as part of a residential development.

Table 1

Zone	Houses Per Acre		Jobs Per Acre	
General Commercial	24.8	50%	20	75%
Waterfront Mixed Use	26.2	100%	20	10%
Mixed Use	26.8	50%	20	75%
City Center	152.4	50%	20	75%
Community Commercial	79.3	50%	20	75%
Neighborhood Commercial	32.7	25%	20	90%
Riverview Gateway Mixed Use	65.9	50%	20	75%

Mixed-use projects most regularly include low intensity commercial uses on the ground floor of residential buildings. Many of these buildings exist in Downtown Vancouver. They feature ground floor retail space with multiple levels of housing located above. These ground floor uses are oftentimes focused on meeting the needs of the building residents, and include coffee shops, laundromats, and small restaurants, all of which employ people

at a far less dense rate than assumed in Table 1. These commercial uses are best described as providing an incidental number of jobs.

Absent a revision to the assumptions for jobs in mixed-use zones, the VBLM will greatly inflate the available land for jobs within Vancouver, even though this land does not actually exist.

****For these reasons, we urge the Planning Commission to pursue revisions that treat mixed-use zones in Vancouver the same as in all other cities and modify the VBLM to adjust downward the probability that jobs will occur in mixed-use zones such that no zone includes an assumption that jobs and housing will occur greater than 100% of the time.**

Planning of this magnitude is daunting and for that reason we hope to be a resource. We can provide clarification for our recommendations as needed or answer any additional questions you might have. As always, NW Partners Comprehensive Plan Taskforce is available to discuss this comment at your convenience.

This public comment provided by NW Partners is a collaborative view of the Taskforce including these organizations:

