

From: [Sonja Wiser](#)
To: [Sonja Wiser](#)
Subject: add to index of record
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From: Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>
Sent: Thursday, March 21, 2024 5:11 PM
To: Sonja Wiser <Sonja.Wiser@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: City of Vancouver supplemental testimony Vancouver capacity assumption issues raised by recent testimony

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Sonja

Can you provide this to the PC for tonight? Its intended to address issues raised about Vancouver VBLM assumptions in other testimony posted today. Thank you



March 21, 2024

RE: Growth capacity estimates in Vancouver

Chair Johnson and Clark County Planning Commissioners:

We understand the March 21 hearing has been advertised for growth allocations only, and not land capacity estimates or the assumptions that go into those as part of the Vacant and Buildable Lands Model (VBLM). To the extent capacity estimates influence the allocation decisions before the Commission tonight, we did nonetheless want to provide clarification, particularly on assumptions used in the City of Vancouver raised in outside written testimony to the Commission posted just today.

Background

The capacity estimates as you know are used to size local land supplies and UGA boundaries, which under GMA are required to provide sufficient but not excess land to accommodate the growth that is planned for. GMA also has internal consistency requirements which effectively prevent a jurisdiction from estimating one growth capacity for sizing its land supplies, and a different growth capacity estimate for its capital facilities planning. No model can be perfect, but there are negative impacts from either overestimating long term growth capacity, or from underestimating it.

County Planning and GIS staff have done an extensive review and adjustment to the VBLM model in recent months, in order to respond to state laws requiring that modeling be based on individual zoning districts, and to respond to official state guidance that when used in Comprehensive Plans, capacity modelling be forward looking. A host of new GMA mandates, particularly around housing, will require the future to look different in some ways than the past.

The recent VBLM adjustments improve the model, but it is still not yet reasonably accurate in our view. The results of the model, its 20-year housing capacity estimates, look low to us when compared to the number of units developers have in application in Vancouver right now. The

model's 20-year employment capacity estimates appear low when compared to how fast actual job growth has occurred in the past in Vancouver, even when annexation is accounted for. The potential undercounting in the model results becomes more apparent when examining some of the assumptions that go into the model. This is particularly the case for employment, where the model assumes there will be almost no job growth through redevelopment or refill over the next 20 years, which in practice occurs not just when a building is replaced, but also when it is expanded or remodeled, or when new employees are added to an existing building that is vacant or partially occupied. The VBLM further assumes future share of home based jobs will be several times less than data shows it has been in the recent post-pandemic years. See our February 27 letter to the Commission for details.

Recent testimony

Recent testimony does not address the overall accuracy of the capacity modelling, but focuses in on select individual assumptions in the City of Vancouver, and does so in a manner that is at odds with our understanding and data about recent trends and requirements:

Vancouver Housing Densities. New testimony requests that future housing in Vancouver single family zones be assumed to occur at the same densities as in the small cities. This ignores the fact that current Vancouver single family densities already exceed those of the small cities as reported in the Clark County Buildable Lands Report, and the fact that allowed housing densities in single family zones in Vancouver and elsewhere will be forced to increase several times over by new laws. In Vancouver HB 1110 effectively requires allowing up to four plexes in all single family zones, and up to six-plexes in zones near high capacity transit, or anywhere if affordable housing is provided. HB 1110 is required to be adopted just after adoption of 2025 Comprehensive Plans, and will be in place through the planning period. It has a self-executing mechanism, whereby the official state model ordinance is automatically applied if jurisdictions don't adopt local implementing standards. Not all properties will make use of the allowance to build four to six times more units than currently allowed, and that is why the future density assumptions for Vancouver single family zones are not even higher than they are.

Vancouver Mixed Use. New testimony requests that Vancouver mixed use zones, which effectively includes all commercial zones, be treated similarly to those in the small cities, with the portions of land assumed to develop for residential and employment uses not adding up to more than 100%. The testimony acknowledges that this captures the reality of mixed use development whereby some land contains both residential and employment uses, but dismisses this as producing only incidental jobs, and only in Vancouver. Mixed use development is more prevalent in Vancouver but appears to be on the increase in most cities, and the job

densities it produces through retail, restaurants or small office uses are likely to be higher than the default VBLM countywide commercial density of 20 jobs per acre, since mixed use buildings typically do not include any larger and less jobs-intensive commercial activities such as bulk sales, storage or similar activities.

The Vancouver zones assume mixed use buildings will account for all or even most of their land, as none of the zones cited in the testimony exceed 125% combined residential and employment shares. This estimate is intended to account for the increasing number of horizontal mixed use sites in Vancouver such as the Heights, Vancouver Innovation Center, Riverview Gateway and others. In these cases, land uses are sometimes within in shared buildings, but also within close but separate buildings with overall residential and employment densities exceeding the VBLM countywide default average.

How to specifically account for the growing number horizontal or vertical mixed use projects in our capacity analyses for the next 20 years is something reasonable people may disagree on, but we don't believe effectively assuming it will not occur or has a de minimis impact on accommodating jobs or housing is appropriate.

Construction. While there are clearly construction companies with specific land needs, we are not aware of any evidence that they can or will physically accommodate anything more than a small fraction of the 6500 countywide construction jobs indicated in the County hearing materials. If anything the estimate of 6500 construction jobs may be low, since the August 1, 2023 memo from Scott Bailey projects future construction to account for 9.1% of jobs, which would be over 8000 jobs countywide.

Thank you for the opportunity to comment.

Sincerely

A handwritten signature in black ink, appearing to read "Bryan Snodgrass". The signature is written in a cursive, flowing style.

Bryan Snodgrass, City of Vancouver Department of Community Development, Principal Planner