

From: [Rebecca Messinger](#)
To: [Sonja Wiser](#)
Subject: FW: Comments for the County Council hearing on population and employment allocations for Clark County's 2025 Comp Plan update
Date: Friday, April 19, 2024 11:43:28 AM
Attachments: [image003.png](#)
[2024-04-18 FW Comments on the Clark County Council public hearing on Population Allocations.pdf](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good morning,

Please see the attached comments.



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

564-397-4305



From: Tim Trohimovich <Tim@futurewise.org>
Sent: Thursday, April 18, 2024 4:36 PM
To: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; jacqui.kamp@clark.wa.gov; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comments for the County Council hearing on population and employment allocations for Clark County's 2025 Comp Plan update

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Dear Councilors and Staff:

Enclosed please find Futurewise's Comments for the County Council hearing on population, housing, and employment allocations for Clark County's 2025 Comprehensive Plan update on

April 23, 2024. Thank you for considering our comments.

If you need anything else please let me know.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



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April 18, 2024

The Honorable Gary Medvigy, Council Chair
Clark County Council
PO Box 5000
Vancouver, Washington 98666-500

Dear Council Chair Medvigy and Councilors Yung, Belkot, Bowerman, and Marshall:

Subject: Comments for the County Council hearing on population, housing and employment allocations for Clark County's 2025 Comprehensive Plan update on April 23, 2024.

Send via email to: rebecca.messinger@clark.wa.gov;
karen.bowerman@clark.wa.gov; glen.yung@clark.wa.gov;
michelle.belkot@clark.wa.gov; sue.marshall@clark.wa.gov;
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Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including Clark County.

Thank you for the opportunity to comment on the population, housing and employment allocations for Clark County's 2025 Comprehensive Plan update. This letter will first summarize our recommendations and then explain them in more detail.

Summary of Recommendations

- The proposed allocations of total housing units in revised Issue Paper 5 are generally reasonable. The population and employment allocations to individual cities should take into account their development capacity, ability to provide public facilities and services, and local goals that are consistent with the countywide planning policies and the Growth Management Act (GMA). Please page 2 of this letter for more information.
- The allocation of affordable housing for each jurisdiction should be based on a method consistent with the State of Washington Department of Commerce's

Housing for All Planning Tool (HAPT). This is necessary to comply with the GMA and to equitably distribute affordable housing capacity. Please page 3 of this letter for more information.

- The County and Cities must plan for affordable housing types including providing sufficient land for affordable densities. This is also necessary to comply with the GMA and to equitably distribute affordable housing capacity. Please page 4 of this letter for more information.
- Urban growth area expansions are not justified and will not increase housing affordability. Given the existing capacity of the urban growth areas, the GMA does not allow urban growth expansions for residential development. Please see page 6 of this letter for more information.

Detailed Recommendations

The proposed allocations of total housing units in revised Issue Paper 5 are generally reasonable.

The proposed allocations of total housing units in revised Issue Paper 5 are generally reasonable. Higher allocations could be considered for the City of Vancouver given that the Vacant and Buildable Lands Model (VBLM) tends to under count capacity in the City of Vancouver.¹ We do appreciate the hard work the County and cities have put into improving the VBLM and bring it into closer compliance with the Growth Management Act.

We are concerned about the interaction of the employment projections and the VBLM. The countywide employment number is optimistic. “[H]istorically almost a third of the county’s labor force, about 65,000 in 2019, commuted to Portland on a daily basis, while only about 17,000 commuted in the opposite direction.”² As you all know this at least partially results from Washington not having an income tax and having a sales tax and Oregon having an income tax and not having a sales

¹ City of Vancouver letter to the Clark County Councilors and Planning Commissioners, RE: comment letter for 2/29 County PC and 3/5 County Council hearings on countywide growth allocations to individual jurisdictions pp. 4 – 5 (Feb. 27, 2024).

² Scott Bailey, regional labor economist, Clark County profile (Washington State Employment Security Department: updated July 2022) last accessed on April 18, 2024, at: <https://esd.wa.gov/labormarketinfo/county-profiles/clark> and at link on the last page of this letter with the filename: “ESDWAGOV - Clark County profile.pdf.”

tax.³ Given this tax dynamic it seems unlikely that many Oregon employees living in Clark County will decide to change their employment location.

The issues with the VBLM compound our concern with the over optimistic employment projections. The VBLM assumes almost no job growth through redevelopment or infill development over the next 20 years. This is inconsistent with the fact that the second largest industry sector in Clark County is professional and business services with 22,300 employed in 2021.⁴ This sector has grown significantly as has the software industry. These jobs are located in offices that can increase employees by using more space efficient layouts and the offices can be redeveloped or added onto to create larger buildings. Many of these jobs can also be done from home. Yet, the *2045 2025 Population, Housing and Employment Allocation – Issue Paper 5* assumes that only four percent of the workforce works from home.⁵ Until these issues can be resolved, the VBLM projections cannot be used to support any urban growth area expansions for employment uses.

The allocation of affordable housing for each jurisdiction should be based on a method consistent with the State of Washington Department of Commerce's Housing for All Planning Tool (HAPT).

RCW 36.70A.070 and RCW 36.70A.070(2) provides that Clark County and the cities in the County “shall include”:

- (2) A housing element ensuring the vitality and character of established residential neighborhoods that:
 - (a) Includes an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth, as provided by the department of commerce, including:
 - (i) Units for moderate, low, very low, and extremely low-income households; and

³ *Id.*

⁴ *Id.*

⁵ Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 *2025 Population, Housing and Employment Allocation – Issue Paper 5* Prepared by Community Planning p. 7 last accessed on April 17, 2024, at: https://clark.wa.gov/sites/default/files/media/document/2024-04/issue_paper_5_pop-emp_alloc_4_17_24.pdf.

- (ii) Emergency housing, emergency shelters, and permanent supportive housing;

While the county can select a total population projection that is within the State of Washington Office Financial Management projection range, the affordable housing shall be allocated “as provided by the” State of Washington Department of Commerce.⁶ Affordable housing of all types must be fairly allocated among the cities and county using a method consistent with the State of Washington Department of Commerce’s Housing for All Planning Tool.

The County and Cities must plan for Affordable Housing Types including providing sufficient land for affordable densities.

Clark County Community Planning documented that “over half of the new units needed over the next 20 years will need to be affordable at 80% or less of the area median income.”⁷ The State of Washington Department of Commerce has documented that low-rise multifamily and mid-rise multifamily dwellings are needed to provide housing affordable to families and individuals with incomes between zero to fifty percent of the adjusted median income when subsidies are available in moderate cost communities.⁸ These housing types also provide housing affordable to families and individuals earning between 50 to 80 percent of the adjusted median income without subsidies in moderate cost communities.⁹ Accessory dwelling units can also provide housing for families and individuals earning 50 to 80 percent of the adjusted medium income in moderate cost communities.¹⁰

In higher cost communities, the State of Washington Department of Commerce has documented that low-rise multifamily and mid-rise multifamily dwellings are needed to provide housing affordable to families and individuals with incomes

⁶ RCW 36.70A.070(2).

⁷ Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 *2025 Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5.

⁸ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Feb. 7, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d517g509r389fomjpowh8isjpirlh> and at link on the last page of this letter with the filename: “HB 1220_Book2_Housing Element Update_230823 Final_updated 231031.pdf.”

⁹ *Id.*

¹⁰ *Id.*

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between zero to eighty percent of the adjusted median income when subsidies are available.¹¹ These housing types also provide housing affordable to families and individuals earning between 80 to 120 percent of the adjusted median income without subsidies in higher cost communities.¹² With subsidies, high-rise buildings are also affordable to families and individuals earning between 80 to 120 percent of the adjusted median income.¹³ Accessory dwelling units can also provide housing for families and individuals earning 80 to 120 percent of the adjusted medium income in higher cost communities.¹⁴

As of the fourth quarter of 2023 (the latest data available), Clark County had a Housing Affordability Index of 69.4.¹⁵ This means that a middle-income family in Clark County only earned 69.4 percent of the income need to carry the mortgage payments on a median price home.¹⁶ Clark County had the 12th highest county median home price in Washington State in the fourth quarter of 2023.¹⁷

Clark County's average rent ranks 6th highest out of 17 Washington State rental markets in the fourth quarter of 2023.¹⁸ The average rent for all rental housing units was \$1,554.

By any measure Clark County is a higher cost community. So, "over half of the new units needed over the next 20 years will need to be affordable at 80% or less of the area median income."¹⁹ And these affordable housing units will need to be

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ Washington Center for Real Estate Research Runstad Department of Real Estate College of Built Environments, *Washington State Housing Market Report 4th Quarter 2023* p. 17 last accessed on April 17, 2024, at: <https://wcrer.be.uw.edu/housing-market-data-toolkit/housing-market-reports/> and at the link on the last page of this letter with the filename: "Housing-Market-Report-Q4-2023.pdf."

¹⁶ *Id.*

¹⁷ *Id.* p. 15.

¹⁸ Washington Center for Real Estate Research Runstad Department of Real Estate College of Built Environments, *Washington State Apartment Market Report 4th Quarter 2023* p. 4 last accessed on April 17, 2024, at: <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2024/01/Washington-Apartment-Market-Report-Q4-2023.pdf> and at the link on the last page of this report with the filename: "Washington-Apartment-Market-Report-Q4-2023.pdf."

¹⁹ Clark County Comprehensive Plan 2025 Update Planning for growth 2025 – 2045 2025 *Population, Housing and Employment Allocation – Issue Paper 5* prepared by Community Planning p. 5.

constructed as low-rise multifamily and mid-rise multifamily dwellings to be affordable even with subsidies.²⁰ These housing types are also in demand for market rate housing. So, an even higher percentage of the housing to be constructed over the next 20 years will need to be these housing types to make progress on affordable housing.

Some have characterized the findings on the housing types that are feasible for the construction of affordable as requiring low- and moderate-income families to live in multi-family housing. That is not the case. These findings are a simple recognition that certain housing types and densities are more economical to build than other housing types. Detached single-family homes or even duplexes and triplexes built on farms and forests converted to exurban subdivisions are never going to be affordable to low- and moderate-income families.²¹ They are also not likely to be affordable to families earning 80 to 120 percent of the county median income.²² Failing to plan for the affordable housing types and densities means that low- and moderate-income families will not have safe, attractive, and affordable housing.

RCW 36.70A.070(2)(c) requires the County and City housing elements to “[i]dentif[y] sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes[.]” So the County and cities must identify sufficient land for these housing types.

Urban growth area expansions are not justified and will not increase housing affordability.

Low-rise multifamily and mid-rise multifamily dwellings are a better fit for existing cities and towns rather than farm, forest, and rural land converted to suburbs and exurbs. Expanding urban growth areas for low density housing will

²⁰ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023).

²¹ *Id.*

²² *Id.*

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just pave over farms, forests, and rural areas for unaffordable housing.²³ As the City of Vancouver explained, Clark County adopted the largest urban growth area expansions in Washington state in the County 2004 and 2007 comprehensive plan updates.²⁴ But Clark County's housing prices increased twice as fast as Washington State as a whole by 2016 comprehensive plan update.²⁵ Urban growth area expansions are not going to solve the affordable housing crisis. Only careful planning for affordable housing types in existing cities and towns and the urban parts of unincorporated urban growth areas can effectively address affordable housing needs.

While the large urban growth area expansions failed to produce affordable housing, the urban growth area expansions contributed to transportation funding deficits. Clark County's County Comprehensive Plan Transportation Element projects a 20-year deficit of \$158,104,000.²⁶

This was predicable because one of the reasons for urban growth areas is to save taxpayers and ratepayers money. In a study published in a peer reviewed journal, Carruthers and Ulfarsson analyzed urban areas throughout the United States including Clark County.²⁷ They found that the per capita costs of most public

²³ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023).

²⁴ City of Vancouver letter to the Clark County Councilors and Planning Commissioners, RE: comment letter for 2/29 County PC and 3/5 County Council hearings on countywide growth allocations to individual jurisdictions p. 6 (Feb. 27, 2024).

²⁵ Washington Center for Real Estate Research/Washington State University, *Housing Market Snapshot State of Washington and Counties First Quarter 2008* p. *1 last accessed on April 17, 2024, at https://re.be.uw.edu/wp-content/uploads/sites/9/2013/10/Snapshot_o8Q1.pdf and at the link on the last page of this report with the filename: "Snapshot_o8Q1.pdf;" *Housing Market Snapshot State of Washington and Counties Second Quarter 2016* p. *1 last accessed on April 17, 2024, at: <https://re.be.uw.edu/wp-content/uploads/sites/9/2018/04/snapshotq216-2.pdf> and at the link on the last page of this report with the filename: "snapshotq216-2.pdf."

²⁶ *Clark County, Washington, 20 Year Comprehensive Growth Management Plan 2015-2035* p. 160 last accessed on Dec. 7, 2023, at https://clark.wa.gov/sites/default/files/media/document/2023-01/2015-2035%20Comprehensive%20Plan-ORD.%202022-07-01%20AR_Dockets.pdf.

²⁷ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 511 (2003) last accessed on April 10, 2024, at: https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise_UrbanSprawl.pdf and at the link on the last page of this letter with the filename: "Urban sprawl and the cost of public services.pdf." Environment and Planning B is a peer reviewed journal. See the Environment and Planning B webpage last accessed on Feb. 20, 2024,

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services declined with density and increased where urban areas were large.²⁸ Compact urban growth areas save taxpayers and ratepayers money. Compact urban growth areas will also help achieve the GMA requirements to plan for public facilities and transportation facilities because compact urban growth areas require less costly public facilities.²⁹

The Washington State Supreme Court has held that an "UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the [State of Washington Office of Financial Management] OFM, plus a reasonable land market supply factor."³⁰ In other words, any UGA expansion must be needed to accommodate the County's documented need for urban growth.

A comparison of the total 2023-2045 housing unit needs in the *2025 Population, Housing and Employment Allocation - Issue Paper 5* with the "2023 VBLM Capacity" shows that existing capacity can accommodate or is within a few housing units of accommodating the planned housing growth.³¹ And the cities and unincorporated urban growth areas will likely need to increase their capacity for low-rise multifamily and mid-rise multifamily dwellings to meet the affordable housing requirements increasing the housing capacity in the cities and unincorporated urban growth areas. So, there is no apparent need and no apparent legal authority to expand the county's urban growth areas.³²

We were surprised to see that one of the Planning Commission recommendations was to seek a careful analysis of Vancouver's assumptions on mixed-use zones and low-density residential zones to verify the feasibility of actual achieved densities

<https://journals.sagepub.com/home/epb> and at the link on the last page of this letter with the filename: "Environ & Planning B webpage.pdf."

²⁸ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003).

²⁹ RCW 36.70A.020(10), (12); RCW 36.70A.060(2); RCW 36.70A.070(3), (6).

³⁰ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 - 52, 190 P.3d 38, 48 - 49 (2008).

³¹ Clark County Comprehensive Plan 2025 Update Planning for growth 2025 - 2045 *2025 Population, Housing and Employment Allocation - Issue Paper 5* prepared by Community Planning p. 5; Clark County 2025 Allocation based on VBLM and HAPT Method A p. *1 last accessed on April 18, 2024, at: https://clark.wa.gov/sites/default/files/media/document/2024-02/Allocation%20Housing_Method%20A.pdf and at link on the last page of this letter with the filename: "Allocation Housing_Method A.pdf."

³² *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 - 52, 190 P.3d 38, 48 - 49 (2008).

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for homes and jobs. This was done in the *Clark County Buildable Lands Report*.³³ If anything, the *Clark County Buildable Lands Report* and the Vacant and Buildable Lands Model (VBLM) understates capacity in the City of Vancouver. Time would be better spent improving the VBLM and updating the comprehensive plan by the December 31, 2025, deadline rather than revisiting *Buildable Lands Report*.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email: tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich, WSBA No. 22367
Director of Planning and Law

Enclosures at the following link:

<https://futurewiseorg.sharepoint.com/:f/g/Eh-QtFA1dx5AkoolSfqMscYBaKIR95q-P13wQkDSxOR7vQ?e=IT5S1K>

³³ Department of Community Planning, *Clark County Buildable Lands Report* (June 2022) Appendix D: Annual Residential, Commercial, and Industrial Development by Jurisdiction, Appendix E: Clark County 2021 Vacant Buildable Lands Model Maps, and Appendix F: Clark County 2021 Vacant Buildable Lands Model by Jurisdiction last accessed at: <https://clark.wa.gov/community-planning/buildable-lands-report> and at link on the last page of this letter with the filename: "Final BLR.pdf."