

**From:** [Rebecca Messinger](#)  
**To:** [Jose Alvarez](#); [Sonja Wiser](#)  
**Subject:** FW: Public Comment: Request to Continue Public Hearing the Population, Housing, and Employment Allocation  
**Date:** Monday, April 22, 2024 4:21:56 PM  
**Attachments:** [image001.png](#)  
[NWPartners\\_Population-Employment Allocation Independent Report Comment.docx](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Please see the attached comments re: tomorrow's public hearing. Thanks.



**Rebecca Messinger**  
Clerk to the Council  
COUNTY MANAGER'S OFFICE

564-397-4305



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**From:** Michelle Pfenning <Michelle.Pfenning@clark.wa.gov>  
**Sent:** Monday, April 22, 2024 3:27 PM  
**To:** Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>  
**Subject:** FW: Public Comment: Request to Continue Public Hearing the Population, Housing, and Employment Allocation

*Respectfully,*



*Michelle Pfenning, O.A. II*  
County Council/Manager's Office  
Direct: 564-397-5109  
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**From:** Noelle Lovern <[Noelle@biaofclarkcounty.org](mailto:Noelle@biaofclarkcounty.org)>

**Sent:** Monday, April 22, 2024 3:22 PM

**To:** Gary Medvigy <[Gary.Medvigy@clark.wa.gov](mailto:Gary.Medvigy@clark.wa.gov)>; Karen Bowerman <[Karen.Bowerman@clark.wa.gov](mailto:Karen.Bowerman@clark.wa.gov)>; Sue Marshall <[Sue.Marshall@clark.wa.gov](mailto:Sue.Marshall@clark.wa.gov)>; Glen Yung <[Glen.Yung@clark.wa.gov](mailto:Glen.Yung@clark.wa.gov)>; Michelle Belkot <[Michelle.Belkot@clark.wa.gov](mailto:Michelle.Belkot@clark.wa.gov)>; Kathleen Otto <[Kathleen.Otto@clark.wa.gov](mailto:Kathleen.Otto@clark.wa.gov)>; Oliver Orjiako <[Oliver.Orjiako@clark.wa.gov](mailto:Oliver.Orjiako@clark.wa.gov)>; Michelle Pfenning <[Michelle.Pfenning@clark.wa.gov](mailto:Michelle.Pfenning@clark.wa.gov)>

**Subject:** Public Comment: Request to Continue Public Hearing the Population, Housing, 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,

First, I would like to express NW Partners' gratitude for your continued diligence with the Comprehensive Plan Update. The attached public comment is a reiteration of our verbal comment provide at the April 17 open public comment opportunity and some top-level supporting assertions for continuing the public hearing to a date in May.

The review and analysis being done by Competinomics are well underway, and the report is in development. We expect that the consultant will have the report finalized and available for review by county staff, County Council, and local jurisdictions on April 30, 2024, if not before. We urge this Council to continue the public hearing to a date in May to allow all stakeholders and decision makers to review the report and prepare comments based on its findings. Washington State Legislature extended the deadline for the 2025 Comprehensive Plan Update six months to December 31, 2025 which helps accommodate this additional time.

Please feel free to contact me with any questions or concerns.

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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Chair Gary Medvigy  
County Council  
PO Box 5000  
Vancouver, WA 98666-5000

April 22, 2024

**Re: Clark County Population and Employment Allocation**

Dear Chair Medvigy, Clark County Councilmembers, County Manager, & Director of Community Planning;

As mentioned in NW Partners Comprehensive Plan Taskforce public comment on April 17, 2024, the Taskforce has retained an independent consultant, Competinomics, to undertake a review and analysis of the Population, Housing, & Employment Allocation and associated assumptions.

The review and analysis are well underway, and the report is in development. We expect that the consultant will have the report finalized and available for review by county staff, County Council, and local jurisdictions on April 30, 2024, if not before.

Considering the impact of the Population, Housing, & Employment Allocation and the 20-year implications of the 2025 Comprehensive Plan Update, we believe the pending independent analysis from Competinomics should have a thorough review prior to finalizing the allocations.

We urge this Council to continue the public hearing to a date in May to allow all stakeholders and decision makers to review the report and prepare comments based on its findings. Washington State Legislature extended the deadline for the 2025 Comprehensive Plan Update six months to December 31, 2025 which helps accommodate this additional time.

Below are our assertions for continuing the public hearing on the Population, Housing, and Employment Allocation.

**1. Allow time for further refinement of Method A**

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 resulting in Method A and Method B. We recommend a version of Method A which 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.

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.

**\*\*For these reasons, we suggest that the County Council ask staff to continue to work with local jurisdictions to modify Method A and allow time for all stakeholders to consider alternative strategies to plan and accommodate local housing needs.**

## **2. Review Allocations and Assumptions for Jobs**

Overall, NW Partners Comprehensive Plan Taskforce believes that the Employment Allocation needs significant work prior to approval. There may be additional assumptions regarding jobs that will need refining, however, it appears that there is some agreement that assumptions regarding land for construction jobs must be refined.

Land must be allocated for construction jobs as these companies require significant land to meet their operational needs. Construction 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.

County staff are currently asserting that 25 percent of construction jobs should be allocated land. We believe that number may be a slight underestimation, however, we are awaiting further analysis. While this is one easily identified flaw in the assumptions, further analysis must be completed to ensure accuracy.

**\*\*For these reasons, we urge the County Council to continue the public hearing into May to allow for review of Competinomics analysis and report.**

### 3. Mixed Use Assumptions modeled in one jurisdiction may skew allocations for all

As part of the modeling 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 modeling 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 which is where the assumptions are established. 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 modeling will greatly inflate the available land for jobs, even though this land does not actually exist. While this is one particular concern, we believe that the assumptions for the employment allocation may have other various discrepancies.

**\*\*For these reasons, we urge the County Council to give adequate time for Competinomics to complete their analysis and report as well as time for County Council, staff, and local jurisdictions to review and respond to the analysis.**

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:

