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To: [Rebecca Messinger](#)
Subject: FW: 4/17/2024 - 9:00am Work Session - Issue Paper 5 and Staff Presentation to the Planning Commission
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Attachments: [image001.png](#)
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[image004.png](#)



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From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
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Clark County Council April 16, 2024
P.O.Box 5000

Vancouver, Washington 98666

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

Work Session: [Population, Housing & Employment](#)

[Allocation-Presentation](#)

[-Issue Paper 5-Planning Commission Minutes](#) **Work Session:** [Heritage](#)

[Farm Sustainability Plan](#)

Re: Issue Paper 5 and Staff Presentation to the Planning Commission

Dear Councilors,

Clark County Citizens United, Inc. has reviewed the presentation from staff, Issue Paper 5 and the Planning Commission minutes. The following are CCCU comments regarding those topics.

This is the Planning Commission presentation by Jose' Alvarez

"The **difference** of the unincorporated county estimates, **which includes the rural area and all of the unincorporated, all of the population in the unincorporated urban growth areas**, so the urban growth areas consist of city limits and a portion that's

unincorporated urban growth area. So these are the projected totals out to 2045 assuming five percent growth for the rural area and then what the county total would be. Next slide, please."

CCCU NOTES: So staff is saying that all of the planning and calculations being presented, are based on all of the unincorporated urban area added to the rural area. The result is a particular number used, after assuming five percent growth in the rural area. The question must be asked by the Council, how did staff decide there would be a five percent growth in the rural area? Another question to be asked is how the urban growth area, or the unincorporated urban area, be part of the rural area, when state law says that rural is everything OUTSIDE of the urban growth area? Such logic and calculations allows for the numbers to be manipulated. Staff can say the 5% was a "trend", but in reality, it resulted from an illegal "cap" on rural growth that created a situation of close to zero growth, after the massive downzoning done in 1994.

These are the population estimates and allocation by urban growth area. Again, it's using the sort of OFM base population and then using the 2023 to 2045 VBLM population allocation and that gets us to that 2045 total. Again, this is for the urban growth area, so it doesn't include the rural area in there. Next slide, please.

CCCU NOTES: Here, staff is saying numbers are to be used for only urban growth areas, and not for rural areas. Where did the allocation for the rural area go? CCCU clearly sees staff is not wanting to include growth for the rural area, and is simply deceptive in their rendition of the allocations. State law demands that all of the county population be accounted for, in the buildable lands and the 2025 Comprehensive Plan population allocation. To say one thing and do another is not allowed under the GMA. The Plan has to be consistent, and that includes countywide policies that include both urban and rural. Since it is illegal for the county to put a "cap" on rural growth, the county must accommodate the housing needs of the rural population. CCCU sees that in all of the "story telling" by staff, that goal is not in the planning proposals.

So, again, these are developed at a countywide level

CCCU NOTES: This is not true. Staff has not developed a countywide level of planning required by the GMA.

The next column over under Table 1 it provides the range that OFM provided for Clark County, and then how that filters into the "Projected Countywide Housing Needs" is those that population target of 718,000 is used and it yields a "Total Future Housing Needed" of 309,711 units.

CCCU NOTES: This is not true. Staff has not performed planning for the population target that includes "Projected Countywide Housing Needs". There is nothing in the planning documents to address an accounting of what the rural housing needs are and how they are going to be accommodated.

Again, this is -- and then it's based on a 2020 so it uses the 2020 supply which is showing at 194,000 countywide and a total housing need from 2020 to 2045 of 115,000.

CCCU NOTES; Does this make sense? Old numbers are being used for new numbers to come up with old numbers? This whole report is riddled with this double-talk and deception. One does not have to read any more to understand the cities don't want to increase their urban growth boundaries and the staff is trying to stop growth in the rural area.

In conversations with our **local partners** and jurisdictions we had available to us new, the data from 2020 to 2022 that showed the number of new units that were added during that time period, so in the next slide what you'll see is that we've **added about 12,000 units in that time period**, so what we're planning for **is 115,000 minus those 12,000 units which is roughly the 103,000 that shows up in the slides going forward.**

CCCU NOTES; Just who are the "local partners"? Again, these are manipulated numbers that make little sense, but are good at confusing the reader. This is by design, toward the goal of no change, and reduce the ability for people to live in the rural area, even more.

So, this chart is just like the previous except it's been updated again **to reflect that the 2023 OFM estimate of housing supply.** And so again, like I mentioned, **we increased the "Estimated Housing Supply" so that number went up to 206,000 and so the "Net New Housing Needed" is 103,000 which is that bottom row.**

CCCU NOTES: So, what exactly is being said here? That the previous numbers got changed? That things are being changed around?

So, we took the **estimated capacity of each urban growth area** and so the essentially the percentage is -- **the percentage of the total is what's applied to each UGA** to get an estimate of these numbers. And it also includes in that very first row the **Vancouver Unincorporated and Rural Clark County.**

CCCU NOTES: Now staff has added the rural area to the city again. That was not because staff intended that the rural area get their fair share of new critical housing and jobs. It was because staff intends to use the rural population numbers to grow the urban area. That is not "countywide" planning under the GMA.

The rural area is not included in our Vacant Buildable Lands Model but we do have a separate capacity estimate that estimates that total capacity and that was added to the unincorporated area so to distinguish that portion because this tool it applies countywide and so we had to include it all there

CCCU NOTES: The GMA clearly has volumes of information describing how the counties are to plan for rural growth and is very descriptive. If the legislature did not intend that rural growth occur, that language would not be there. All that is required by a county is to show their work as to how they incorporated rural growth into the Comprehensive Plan. Staff refuses to do that. Instead, they manipulate the numbers to eliminate any possibility for growth in those areas. That is not allowed in the GMA.

So this is, this chart is Commerce's, reflects Commerce Method B where the distribution of the housing need is **done such that in 2045 there's more equity among jurisdictions** in providing housing at the lower income levels.

CCCU NOTES: Equity in housing is all encompassing. It includes all walks of life, both urban and rural. This plan does not demonstrate equity, when rural people are not given an opportunity for robust housing to meet their critical housing needs. There is no equity in telling rural people they cannot live in the rural area, and are then forced to live in the urban area.

And in this chart **the negative numbers in red indicate a surplus of housing** in that income band based on the current number of units within that income band. So based on the numbers here, **Vancouver has a surplus of housing units in that 50 to 80 percent area median income; and Camas has a surplus in the greater than the 100 and greater than 120 percent categories. Next slide, please.**

CCCU NOTES: This statement is false. Where is the scientific data that back this statement up? Since 1994, Clark County has never had a surplus in housing, because at that time allocations were based on false assumptions. Those false assumptions have never changed. The cities are dictating what they want to have happen in their cities, and the rural people are left out of the equation.

The Employment Security Department provided estimates of net new jobs based on two baseline years, one was 2022 and one was 2045. So the 2022 number shows a need of 88,100 units and that's what's reflected here. We use this because it was more aligned with what the Vacant Buildable Lands Model is based on the 2022 Assessor's data as for 2023.

The 2025 numbers would have been 73,500 is the estimate from the Employment Security Department, so there's a 15,000 job difference in those three years, but we decided to use that again, the 2022 number, because it better aligns with the Vacant Buildable Lands Model year. So according to the Vacant Buildable Lands Model the county has a capacity for 65,091 jobs.

CCCU NOTES: What kind of reasoning is this? The whole county is hurting for jobs, but if jobs are created, the housing numbers must change, and planning for growth must then occur. Since 1994, a "no growth" agenda has driven the planning for the Comprehensive Plan.

And the other thing we looked at was the rural and we got data that shows that roughly 5 percent of the employment existing is in rural area, and so since we're doing a 95/5 split for rural it just made sense to also have the 5 percent employment go to that, the rural area, so that wouldn't -- also would reduce the amount of land, it wouldn't account for any land within the urban growth boundaries for those jobs with that 5 percent total

CCCU NOTES: CCCU would like to see the data that shows that roughly 5 percent of the employment exists in the rural area. Staff then justifies this statement to allocate the rural population to a 95/5 urban-rural split. When did apples become oranges? None of this statement makes logical sense. Rural population must be based on housing needs and market factors. To say, "Gee, only 5 % are working in the rural area, so we can't have more than 5% growth", is ludicrous.

The other two categories that we addressed here were the "Work From Home". The current countywide estimate is somewhere between 20 and 21 percent for work from, for folks that are working from home. We got some estimates, there's a memo from our labor economist at the Employment Security Department, we in his initial memo it showed that maybe about four percent growth in that, in his estimate for work from home, but we used a, we're showing that four percent we think it's a very conservative estimate and it's based on the conclusion in that memo that work from home is a relatively new phenomenon with too little data to base any conclusions on and that changes in remote work will be minimal going forward.

CCCU NOTES: It is most likely that the highest number of people who are working from home, live in the rural areas. That is the most desirable place to live. In today's world, working from home is becoming more and more the norm. With the hybrid meeting schedules, even the Councilors are working from home. The same is true for county staff. It's likely not true that changes to remote work will be minimal, as that is the future of the work force.

So in terms of the "Next Steps" after the Council completes the allocation process this will go to the cities so that they can plan for their population, employment and housing and actually develop plans that show how they're going to accommodate that growth over the next 20-year period.

CCCU NOTES; As always, staff is leaving out approximately half of the county population, when planning for employment and housing. Such planning is only half planning, and has gotten this county in the critical housing and employment shortage that it is in today. This type of planning doesn't work.

Typically, a cities alternative of how they're going to accommodate that strategy and then an additional scenario where the County is looking at how they're going to allocate their urban and unincorporated area as well as some of the suggestions from the cities. With that, do you have any questions?

Information and Excerpts from the Planning Commission Meeting Minutes

CCCU NOTES; The only comment that CCCU can make over the minutes and conversation from the Planning Commission is that the commission members have a lot to learn, and have very little understanding as to what staff is presenting. It's no wonder, because most of it is smoke and mirrors information. CCCU sees that staff skirts around their questions, talks around them, overwhelms them with conflicting data, and by the end of the session, commission members simply say, OK.

With all due respect, they praise the staff for their work, but they don't really know what staff did. Commissioners had good questions that got no answers. After 30 years of working with land use, CCCU sees this happen to PC members, over and over again. Staff controls the agenda and the vote, and the Commission is at their mercy. That is unfortunate and needs to change.

BAKER: But those unincorporated areas are included in the unincorporated UGA which so those were that came up to the 46,391 that I assumed was in the Clark County because La Center, Ridgefield unincorporated areas, all those unincorporated areas that you're speaking of, they have -- they're on the back of this, this table, this report starting at Page 19 which goes through the jobs, mostly the jobs on Page 19, but then from 20 through 24 it's listing out Battle Ground, Camas and, you know, it allows for vacant underutilized properties and lists them out in that way. And so, all those unincorporated areas it seems like they're being accounted for in that 46,000 that I attributed to the UGA for Clark County. Vancouver unincorporated and rural Clark County lists 46,391 per the VBLM on Page 24. And I might be reading this wrong, I just need help with -

ALVAREZ: Oh, I see. All right. So, there are, so again it's, they're broken out into the two. So on the second page where it says Battle Ground, the VBLM 2023 Capacity and Yield By Zoning: City, UGA, so their 6978 is the total, the unincorporated cities, the 5327, and then the unincorporated UGA is the 1651, okay, and so they're broken out into two different sections of the report and that bottom is just all of the unincorporated area and there shouldn't be, and I think that's where that 43,000, so it's the

unincorporated Vancouver UGA and then in the unincorporated portion of all of the other UGAs summed together.

CCCU NOTES: Did anyone follow this explanation? CCCU thinks everything ended at the end of the first sentence, ...they're broken out into the two.

ORJIAKO: This is Oliver. I think you look at, you're making a good observation, but you look at it in terms of the model does not include publicly owned land where most of these government jobs are going to occur. It's true that schools acquire property that they have not yet developed, and true we do identify those lands but do not assign, it's not included in the Vacant Buildable Lands estimate because we assume that those publicly owned land will eventually that's where the government jobs will go. Remember that there are some schools that are in the rural area predominantly and that's why again we are allocating some jobs in the rural area because some of that will occur naturally speaking.

Yes, governments do acquire land, but if you look back in the last 10, 20 years not a whole lot have been acquired,....

CCCU NOTES: Clark County has acquired thousands of acres during those years.

HARROUN: Okay. Thank you. Could you just clarify to me, like, just on the chart, the 95/5 percent rural urban split, is that just looking at 95 percent of everything that we're looking at is just in the urban environment and then 5 percent is rural, is that kind of how that, am I reading that right, that was my assumption?

ALVAREZ: So, the increment of growth for the next 20 years we assume 95 percent of it would happen in the urban area and 5 percent in the rural.

CCCU NOTES; This rural assumption is wrong thinking, and should not be accepted by anyone.

HARROUN: My apologies. So, a lot of their comments are based on, so "This study is based on wetland and critical area conversion for actual development projects rather than simple modeling."

HALBERT: Thanks, Mark. I just have two easy questions hopefully. One is on the population projection on Page 4 we have 718,154 population projection but on Page 11 we're only at 639, I wondered what the, where I missed that difference in the population projection there?

CCCU NOTES: Just as the public and CCCU discovered about every GMA Comprehensive Plan, the numbers don't jive.

ALVAREZ: Oh, that's -- that doesn't include the rural, that's total rural
Sincerely,

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