

**From:** [Oliver Orjiako](#)  
**To:** [Sonja Wiser](#)  
**Subject:** FW: City of Vancouver comment letter in advance of 4/17 Council workshop on Comprehensive Plan update  
**Date:** Monday, April 15, 2024 8:21:44 AM  
**Attachments:** [24 04 17 COV to CCC fnl.docx](#)

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Hi Sonja:

Just as FYI for the comp plan record. Thanks.

Oliver

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**From:** Snodgrass, Bryan <Bryan.Snodgrass@cityofvancouver.us>  
**Sent:** Friday, April 12, 2024 4:22 PM  
**To:** Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>  
**Cc:** Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>  
**Subject:** City of Vancouver comment letter in advance of 4/17 Council workshop on Comprehensive Plan update

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Rebecca

Attached please find a comment letter from the City of Vancouver seeking clarification on what will be decided in upcoming Council meetings for the Comprehensive Plan update. Thank you.



April 11, 2024

RE: Scope of upcoming County Council Comprehensive Plan update meetings

Chair Medvigy and Clark County Councilors:

With important Comprehensive Plan update meetings coming up in the next few weeks we are seeking clarification on what will be decided, and what information will be used to make the decisions. The April 17 workshop and April 24 public hearing are both currently advertised on the project website as limited to growth allocations. However, at a recent March 21 County Planning Commission hearing also publicly advertised only for growth allocations, separate recommendations on land capacity assumptions were made, based on testimony submitted on the day of the hearing.

We respectfully ask the following going forward:

1. **Please clarify if decisions on land capacity assumptions will or will not be revisited in the coming hearings.** The VBLM and other inputs to estimating long term land capacity are as you know impactful and complex, and have been subject to lengthy review over the past few years. If these are to be re-opened to further public hearing review and Council decisions, it should be made clear so all parties can weigh in accordingly. The City of Vancouver would have participated differently at the recent Planning Commission hearing had we known the Commission could be making recommendations on capacity assumptions, as opposed to just considering capacity issues as part of the allocation decisions as was advertised. Other community groups or individuals, particularly those who were involved in the Buildable Lands Project Advisory Committee, might have attended or testified had they known what was at stake. We ask that you clarify before the upcoming workshop whether or not the subsequent hearing will include decisions on capacity assumptions. Please also consider moving the hearing from April 23 to a later date as we understand is currently being contemplated, in order to allow all parties to meaningfully prepare for and submit advance information for the hearing once the content has been

established at the April 17 workshop. The currently scheduled six-day turnaround doesn't allow this.

2. **In your deliberations to arrive at a decision, please address all recent and pertinent information, not just information submitted by some parties at the very end.** The below went completely unmentioned, pro or con, in the recent County Planning Commission deliberations:
  - a. **The March 19, 2024 joint Cities letter to the Commission and Council.** The letter from the Cities of Battle Ground, Camas, La Center, Ridgefield, Vancouver, and Washougal does not address *individual* VBLM assumptions, but does support the adequacy of the overall existing land supplies, stating that larger UGA expansions beyond the modest changes currently contemplated by the small cities primarily for jobs are *not* needed to support robust economic or housing futures in our communities. On housing allocation the joint letter states that something between Methods A and B is a workable compromise. In the most recent City-County staff meeting last week there appeared to be consensus support for a countywide allocation halfway between Methods A and B, with the exception of the City of Camas which expressed a preference for Method A or close to it for its individual allocation within its area.
  - b. **The February 27 City of Vancouver letter to the Commission and Council on capacity/VBLM issues.** The letter highlights why the latest capacity estimates still appear to underestimate actual existing growth capacity for jobs and housing, and identifies some specific VBLM assumptions which are likely contributing to the problem. If capacity and VBLM issues are re-opened, please consider this in your deliberations, as it speaks directly to those issues<sup>i</sup>
  - c. **Existing Countywide Planning Policy 2.1.1 on page 72 of the County Comprehensive Plan calling for fair share regional housing planning.** It states in part that ***'All jurisdictions will cooperate to plan for a "fair share" of the region's affordable housing needs and housing for special needs population.'*** This doesn't provide specific numerical guidance, but under GMA internal consistency requirements the chosen allocation still needs to be consistent with its general direction. Method B arguably comes closest, since it ensures that Vancouver provides for the lion's share of local below market housing, while fully recognizing the existing housing stock in Vancouver and other cities that is already in place to meet these obligations. We are open to an allocation halfway between Method's A and B, which would eliminate the problems of negative allocations for some jurisdictions in certain income brackets and provide for

ample flexibility for all while still partially recognizing existing housing. Method A or something close to it does not appear consistent with the fair share requirements of the policy since it would provide for little or no recognition of longstanding existing housing. The existing stock of below market housing is not just a reflection of what a local government has allowed, but also what its community is living with. Failure to meaningfully recognize the existing stock hurts not just the City of Vancouver, but also Battle Ground, Woodland and Yacolt, whose below market housing obligations are all also higher under Method A than Method B. In fairness we note we have overlooked this policy in our submittals and testimony to date but raise it now because of its direct relevance.

- d. **Oral testimony at the March 21 hearing suggesting an accounting adjustment to increase future housing planning flexibility for all jurisdictions.** Consider using actual recent housing construction data for units built countywide since 2020 rather than the recent assumption that all of such units fell into the 120% of AMI and over income category. By accounting for recently built mobile homes, ADUs, cottage clusters, small or inexpensive single-family homes, plexes, townhomes or affordable housing projects that occurred throughout the county, all jurisdictions can lower their burden to varying degrees to accommodate future below market units and can increase their ability to accommodate single family housing.
  
- e. **The role of longstanding existing housing stock.** Overall, new housing units required countywide by HB 1220 were discussed at the recent hearing as if they were the only way to accommodate future needs, when in fact the current existing stock of 200,000 units countywide is twice as large as the future need. New persons relocating to Clark County over the next 20 -years have the option of moving into previously built housing that is available to buy or rent, as well as newly constructed units.

This existing stock is dominated by single family homes, with 75% of existing countywide units, and 90% outside the City of Vancouver, currently being detached housing per [OFM](#). Arguments that we must add land to urban growth areas to accommodate single family demand ignore that most of our existing stock is comprised of this. HB 1220 requirements for new housing do skew towards smaller single-family lots or middle or multi-family housing of various densities, but this is partially in response to the significant imbalance in the existing stock. Implementation of HB 1110 over the 20-year planning period will further create a more balanced supply of housing within our communities, but most countywide residents will continue to live in single family homes in 2045 due to its overrepresentation in our current stock.

Thank you for the opportunity to comment. We anticipate providing more detailed comments in advance of the Council hearing once the scope and scheduling of the hearing is clarified.

Clark County is of course not obligated to agree with the positions of Vancouver or the other cities, but we believe because of their importance, each of the above issues warrant explicitly addressing in your upcoming discussions and deliberations. We look forward to the discussion.

Sincerely,

A handwritten signature in dark ink, appearing to read "Erik W. Paulsen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Erik Paulsen

Mayor Pro Tempore, City of Vancouver

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1. The latest employment capacity estimates appear to underestimate growth capacity, as they indicated the City of Vancouver only has room to grow an average of approximately 1,200 new jobs per year through 2045, compared to the actual average in currently city limits of 1,600 new job per year since 2002, a period during which there was a historic recession, and a pandemic. Individual model assumptions that appear to be contributing to an undercounting include an assumption that home based work will plummet from current levels, absent data that this will occur; and an assumption that there will be virtually no long-term job growth through redevelopment of existing buildings, or adding of any employees within existing buildings, even vacant or underused buildings.

Despite improvement, the latest housing capacity estimates also appear to still underestimate actual growth capacity in light of applications currently under review. The VBLM projects that Vancouver has a 20-year capacity for about 2.5 times as many housing units as developers already have under review with the City right now, which appears low given that most applications result in development within 2-5 years, not 20 years. Individual model assumptions likely contributing to an overall undercounting of capacity include the assumption for critical lands deductions that is based on data with little or no multi-family housing included; an assumption that future long term redevelopment will be slower than in the recent past, without data that this will occur; and an assumption that long term unincorporated VUGA residential densities will not be impacted by HB 1110 housing requirements, which is effectively an assumption that no VUGA residential annexations will occur during the 20 year planning period.