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**To:** [Gary Medvigy](#); [Karen Bowerman](#); [Glen Yung](#); [Michelle Belkot](#); [Sue Marshall](#); [Kathleen Otto](#); [Michelle Pfenning](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Sonja Wiser](#)  
**Subject:** Public comment - Population, Housing, & Employment Allocation  
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[NWPartners Population-Competinomics-Report.docx](#)

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Greetings, Chair, Councilors, County Manager, and Community Planning.

Please see attached NW Partners Comprehensive Plan Taskforce public comment on the Population, Housing, & Employment Allocation. We respectfully request that this be entered into the record.

Our comment contains 6 recommendations:

- 1) Clarity on assumptions and how feedback has been integrated should be required before finalizing the Population, Housing, and Employment Allocation.
- 2) Market factors must be integrated for a complete and actionable Comprehensive Plan Update.
- 3) Continue to audit and improve permitting timelines.
- 4) Correct employment densities to rectify overestimation of capacity.
- 5) Adopt 34 percent for land capacity for construction jobs.
- 6) Integrate realistic critical areas assumptions based on private industry outcomes to ensure accuracy in capacity.

The background and context for each of these items are included in the attached public comment. We are available to discuss these recommendations at your convenience.

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

May 6, 2024

**Re: Clark County Population and Employment Allocation & Competinomics Report**

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

Thank you for the opportunity to comment on this important process. Considering the impact of the Population, Housing, & Employment Allocation and the 20-year implications of the 2025 Comprehensive Plan Update, Competinomics LLC was retained by NW Partners for a Stronger Community and other community stakeholders to review and analyze the assumptions associated with the Population, Housing, and Employment Allocation. On April 24, Competinomics report was made available to Clark County Council and staff as well as councils and staff of Vancouver, Battle Ground, Camas, La Center, Ridgefield, and Washougal.

This comment represents our high-level takeaways from the Competinomics report and the Population, Housing, and Employment Allocation. This is a comment from our Taskforce, however, additional comments from individual Taskforce members will drill down on specific technical aspects of housing and jobs. Below is a list of recommendations from this Taskforce:

- 1) Clarity on assumptions and how feedback has been integrated should be required before finalizing the Population, Housing, and Employment Allocation.**

During the public comment process for the Population, Housing, and Employment Allocation, staff has continually asserted that the matter of VBLM assumptions have been settled. We believe that is incorrect.

The VBLM is a working model that evolves with new conditions that require refinement of assumptions. The VBLM will not be complete until conditions get stagnant, which is likely never. One new condition is HB 1220. Further, it appears that VBLM assumptions have

been applied through the HAPT which produced the allocation and is currently up for public comment. While county staff requested feedback on the VBLM via a news release in February, the public hearing slated for April 23 to address the VBLM assumptions on the project timeline did not occur.

It appears that the assumptions relating to the VBLM, and subsequently the HAPT, are interconnected and must be addressed to ensure the allocation is accurate.

**2) Market factors must be integrated for a complete and actionable Comprehensive Plan Update.**

It appears that the County and cities are coming to an agreement on how to address HB 1220 within the context of the 2025 Population, Employment, and Jobs Allocation. This agreement fulfills the requirement to plan and accommodate housing for each income band from 0% to +120%AMI. While the planning and accommodating exercise required by HB 1220 appears to be winding down, Competinomics report provides a snapshot of trends and market demand that are shaping Clark County.

We do not believe that the agreed upon HAPT tool outputs are wrong nor do we believe that Competinomics is wrong. They are addressing two very different focuses. One focuses on compliance with legislation (GMA & HB 1220) and the other illustrates the actual market environment and conditions. Each of these aspects are equally critical to the growth management planning process.

With the challenge to construct the projected 103,000 housing units over the next 20 years, the building and development industry's most effective contribution to this effort will be to build what the market demands. Building units not supported by market demand will further exacerbate the housing crisis. If Competinomics report is accurate, there is an overestimation of Clark County's need for new housing for households earning below 80 percent of area median incomes in many jurisdictions. Should the 2025 Comprehensive Plan Update not address this discrepancy, the current housing crisis may continue to escalate.

In Competinomics report, they reference HUD's Housing Inventory Count Report for 2023 and income data which indicates that the market does not appear to support a 12 percent increase in Permanent Supportive Housing/Non-Permanent Supportive Housing. Without closer examination of this allocation, Clark County may overbuild a product that will be underutilized and difficult to fund. It is important to note that builders will not develop units where there is no demand. Please consider a deeper review of this allocation and include market factors.

**3) Continue to audit and improve permitting timelines.**

One observation in Competinomics report that should not be brushed by is the costly impact of regulations. The report states that Washington's regulatory environment is "responsible for increasing poverty and inequality while reducing the number of jobs." The report suggests that jurisdictions should activate levers to ensure that land is available, developable, and the permitting process is not disrupted by unnecessary regulatory barriers, should be streamlined, and stable, not subject to shifting

requirements. To keep these matters in check, it will require periodic audits and continual refinements.

**4) Correct employment densities to rectify overestimation of capacity.**

Competinomics uncovered what appears to be an error in employment densities by applying the assumption to net acres when it was intended to be gross acre assumptions resulting in an overestimation of employment land capacity in all jurisdictions. This error results in overestimating land capacity for nearly 20,000 jobs. This assumption should be corrected to ensure land capacity for all jobs is accurate.

**5) Adopt 34 percent for land capacity for construction jobs.**

We are encouraged by the recent adjustments to the Employment Allocation in the matter of construction jobs. However, Competinomics' report suggests that the assumption for construction jobs does not adequately address the need for land capacity for Heavy & Civil Engineering Construction. It is recommended in the report to adopt an assumption of 34 percent to ensure land capacity for construction jobs. Please consider adopting 34 percent for land capacity for construction jobs.

**6) Integrate realistic critical areas assumptions based on private industry outcomes to ensure accuracy in capacity.**

The report reviewed critical areas assumptions which impact developable lands for both jobs and housing. Competinomics identified a misalignment between critical areas conversion assumptions and actual development data from the private sector. The report further cautions that environmental regulations have increased and tightened since previous Comprehensive Plan Updates and will likely continue to do so, therefore, assumptions associated with this allocation should be adjusted to integrate development data to ensure the quality and developability of the land included as capacity. Please consider making this adjustment.

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:

