

From: [Sonja Wiser](#)
To: [Tim Trohimovich](#)
Cc: [Christine Cook](#); [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: Comment for May 7 continued hearing on population and housing allocations
Date: Tuesday, May 7, 2024 6:39:00 AM
Attachments: [2024-05-06 FW Comments on the Clark Cnty Council cont public hearing on Population Allocations.pdf](#)
[image003.png](#)

Good morning Tim; thank you for your comments. I will send to staff and add to the Index of Record. Have a nice day !

From: Tim Trohimovich Tim@futurewise.org
Sent: Monday, May 6, 2024 4:59 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>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comment for May 7 continued hearing on population and housing allocations

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.

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 May 7, 2024.

Send via email to:

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



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May 7, 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 May 7, 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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comp.plan@clark.wa.gov

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 again 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 State of Washington Department of Commerce's Housing for All Planning Tool (HAPT) must be used to identify the projected housing needs by income category for the County population target. This is necessary to comply with the GMA and to equitably distribute affordable housing capacity. Please page 2 of this letter for more information.
- The proposed allocations of total housing units in revised Issue Paper 5 are generally reasonable. Please page 4 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 2 of this letter for more information.
- The County's employment allocations take into account the relevant factors and plan for one job per household, a very optimistic goal. Please page 4 of this letter for more information.

Detailed Recommendations

The State of Washington Department of Commerce's Housing for All Planning Tool (HAPT) must be used to identify the projected housing needs by income category for the County population target.

RCW 36.70A.070 and RCW 36.70A.070(2) provide 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

(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 housing units needed by income category shall be identified "as provided by the" State of Washington Department of Commerce Housing for All Planning Tool (HAPT).¹ 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

¹ RCW 36.70A.070(2); 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. 61 "counties are required to use the HAPT to identify projected housing needs associated with their chosen countywide population target"

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Commerce's Housing for All Planning Tool (HNAT) housing needs by income category.

The Housing Needs Allocation Tool (HNAT) plans for housing affordable to all Clark County families.² This includes permanent supportive housing, housing affordable to families making zero to 60 percent of the Clark County median income through families making more than 120 percent of the Clark County median income.³ This is consistent with the Growth Management Act that requires planning for housing for individuals and families of all incomes.⁴ The county cannot legally or morally shift housing units from lower income categories to higher income categories.⁵

One of the reasons the Housing Needs Allocation Tool (HNAT) results for Clark County shows significant housing need for permanent and non-permanent supportive housing is that the homeless population is growing. The 2023 Clark County Point In Time Count for 2023 showed that 1,300 people were homeless in Clark County on January 26, 2023, up 9 percent from February 2022.⁶ The count found that 672 people were homeless and unsheltered, up 8 percent from February 2022.⁷ We need to provide more land for permanent supportive housing and very low income housing to combat homelessness.

Housing affordability trends also underline the need to plan for more affordable housing. As of the fourth quarter of 2023 (the latest data available), Clark County

² 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. 59 (Aug. 2023) last accessed on May 6, 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."

³ *Id.* p. 62 - 68.

⁴ RCW 36.70A.070(2).

⁵ RCW 36.70A.070(2); 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. 61.

⁶ *2023 Clark County, WA Point In Time Count Results with 2022 Comparisons* last accessed on May 3, 2024, at: <https://www.councilforthehomeless.org/point-in-time-count/#1623946875433-c7e15bdb-089f> and at link on the last page of this letter with the filename: "2023-PIT-Count-Results-Infographic-Summary-pdf-1024x791.pdf."

⁷ *Id.*

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had a Housing Affordability Index of 69.4.⁸ 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.⁹ Clark County had the 12th highest county median home price in Washington State in the fourth quarter of 2023.¹⁰

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 need to plan for more affordable housing types and densities.

The County's employment allocations take into account the relevant factors and plan for one job per household, a very optimistic goal.

The County's job allocations take into account long-term trends in the county and, if met, would provide one job for each household. This is a higher job to household ratio than has been achieved in modern times. The Vacant and Buildable Lands Model (VBLM) did not over count jobs capacity. If anything the VBLM under counts job capacity in Vancouver.

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

⁸ 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.”

⁹ *Id.*

¹⁰ *Id.* p. 15.

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under count capacity in the City of Vancouver.¹¹ 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.

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=bgJOEE>

¹¹ 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).