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To: [Sonja Wiser](#)
Subject: FW: 2024-05-06 Memo re Planning for Jobs.pdf
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[image002.png](#)
[2024-05-06 Memo re Planning for Jobs.pdf](#)

FYI. For the record. Thanks.

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Subject: 2024-05-06 Memo re Planning for Jobs.pdf

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Good morning Councilors,

Attached you will find a memorandum addressing the jobs component of the current update process Clark County's Comprehensive Growth Management Plan.

I will testify at tomorrow's hearing and would be happy to answer any questions you may have about this submittal.

Best...Steve

[Stephen Horenstein](#)

—
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Memorandum

To: Board of County Councilors
From: Stephen W. Horenstein
Date: May 6, 2024
Subject: Planning for Jobs - the 2025-2045 Comprehensive Growth Management Plan

Updating a 20-year Comprehensive Growth Management Plan (Plan) is a policy driven process that uses data to inform how a community will grow and develop over a long period of time. Its primary goal is to ensure that adequate infrastructure and land exists to accommodate people and jobs, which in the case of Clark County involves the addition of more than 200,000 people to the community – equivalent to adding another city with the current population of Vancouver.

This planning process is more than a math exercise. It involves more than putting numbers into formulas. This memo addresses various topics related to the jobs component of this planning process. It provides information as to the inadequacy of the current planning process for jobs and addresses what else needs to be done.

1. Jobs to Housing Balance. Legislation adopted in 2022 and 2023 by the Washington legislature mandating much more robust planning for housing at all income levels has provided new levels of complexity for updating Clark County’s 20-year Comprehensive Growth Management Plan (20-Year Plan). However, it remains necessary to plan for adequate jobs for the 2025-2045 period. Indeed, requirements for more housing also require more in-depth planning for jobs. In this regard, the housing element of the 20-year plan does require local jurisdictions to address the “jobs-to-housing” balance. See Washington Administrative Code section 365-196-410(2)(B).

To date, information provided by staff analyzes jobs separately from housing and has not publicly identified any balance between the two. And, with the additional housing being planned for under the 20-Year Plan, it is counterintuitive to believe that staff’s position that little if any additional land is needed for jobs to meet the jobs-to-housing balance requirements of the Growth Management Act (GMA).

The Competinomics Report (Report) commissioned by NW Partners for a Stronger Community (NW Partners) is instructive as to additional analysis necessary to ensure that the 20-Year Plan contains adequate land for jobs and meets the jobs-to-housing balance requirement of the GMA. The Report also identifies some refinement necessary in the current planning for jobs that is being undertaken today.

2. Employment Densities. There appears to be a discrepancy between the 2015 and the 2021 Buildable Land Report (BLR) regarding employment projections per acre. Here is the analysis from the Competinomics report:

EMPLOYMENT DENSITIES

The 2021 Buildable Lands Report (BLR) states that VBLM employment densities of 20 employees per net acre for commercial land and 9 employees per net acre for industrial land were used in the 2015 BLR and established by the 2007 BLR.

However, it appears that the 2015 BLR misstated the 2007 assumptions. The actual employment densities applied in 2007 were 7.9 for net commercial acre and 8.2 for net industrial acre. In the 2002 BLR, the County observed and applied assumptions of 22 employees for gross commercial acre and 10 employees for gross industrial acre.

It appears that the current employment densities being applied to net acres were meant to be gross acre assumptions. If that is the case, then the VBLM model is likely over estimating employment land capacity in all jurisdictions, particularly for commercial land. Figure 9 compares current VBLM land capacity with estimated land capacity using 2007 BLR employments densities.

Determining reasonable employment densities without the ESD parcel-specific employment data is challenging. For example, if VBLM assumed densities are applied to BLR reported development between 2016 through 2020 of 340 commercial acres and 476 industrial acres, Clark County should have roughly 11,000 new jobs. Actual new jobs between 2016 and 2020 in the County were 6,239. If we assume that 27 percent of new jobs were accommodated on redevelopment sites, then presumably around 4,554 jobs were accommodated on 816 acres. The 2007 BLR estimated net acre employment densities of 7.9 for commercial land and 8.2 for industrial land. The 2015 BLR estimated net acre densities of 9.3 for commercial land and 10.9 for industrial land. The 2022 BLR did not report achieved densities for development.

Figure 9: Estimated Capacity using 2007 BLR Assumptions

Jurisdiction	Land Capacity	
	Current BLR Assumptions	2007 Applied Densities
Battle Ground	7,677	3,705
Camas	11,363	7,784
La Center	2,096	903
Ridgefield	7,998	5,404
Vancouver (City)	18,025	14,398
Vancouver (UGA)	15,168	11,288
Washougal	2,404	3,039
Woodland	-	-
Yacolt	360	268
UGA Total	65,091	46,789

Sources: Clark County Community Planning Presentation (4/17/2024), 2021 BLR, 2015 BLR, 2007 BLR

Staff should be requested to review the analysis set forth immediately above and recalculate its jobs numbers accordingly. We believe that this will show a deficit of 20,000 jobs based on staff's early calculations. Although this number of jobs will not fulfill the overall need for jobs over the next 20 years, it is a start.

3. Construction Jobs. It appears that there is general agreement that the community will grow by 8,000 construction jobs. Staff has indicated that available land needs to be identified for approximately 2,200 of those jobs. The Report indicates that the category of heavy and civil engineering construction jobs are likely not included in the overall calculations. For this reason, it is our recommendation that the County plan for 2,720 jobs (34% of the total number of construction jobs identified above) with land being made available for industrial jobs. As the Report indicates, the industrial vacancy rate in Clark County remains extremely low. With the plan for a population increase of 200,000 people over the 20-year life of the plan, it becomes increasingly important to provide manufacturing and office space for the growth of the population.

As discussed below, without an adequate in-depth evaluation of the quality of the available inventory of industrial lands, and knowing that there are few if any large parcels available for industrial development, it is not possible with the information staff provided to presently conclude that we have a 20-year supply of land for jobs. We would recommend that staff be directed to provide more information here.

4. Additional analysis of jobs land is required. Historically, far more analysis of industrial lands has taken place than has been done for the current planning effort.

In 2016 and again in 2019, an employment lands inventory for Clark County was developed by the CREDC, utilizing a methodology for identifying and assessing on an “on the ground” basis the true availability of employment land. The focus of this analysis was on single or adjacent lots that either existed or could be accumulated to create 20-acre parcels. All of the sites were located within actual city or urban growth area boundaries and were zoned for either industrial or commercial uses.

Of course, there are smaller sites with the requisite zoning. These sites are also diminishing in availability and do not provide as much opportunity for recruitment and retention of large employers to accommodate the community’s need for jobs.

The starting point for identification of the sites described above was the then-existing Vacant Buildable Lands Model (VBLM). Subsequent to the identification of sites, the following detailed analysis was undertaken to fine-tune and develop a realistic list of sites to be developed for jobs:

- A. Ownership analysis was conducted to identify single owner sites (including multiple adjacent sites owned in common).
- B. Net acreage available for development was calculated for each site using professional judgement and not merely the calculations from the VBLM while applying a deduction for critical areas and such not based on real life information.
- C. Advisor groups were formed to tap into those with information and professional expertise to evaluate the sites involved.
- D. Infrastructure availability was analyzed for areas including public water, sanitary sewer, stormwater systems, power, natural gas, broadband, brownfields analysis and transportation access along with system mobility including transit access.
- E. Use restrictions were identified by checking the relevant city or county zoning codes.
- F. Analysis of market readiness using commercial databases and stakeholder information was conducted to determine which sites may or may not be available for sale or lease.

The complex and detailed analysis identified above were combined into a tier rating system for each identified employment site:

Tier 1 sites – Can be development ready within six months

Tier 2a sites – Those that may be developable in between 7-12 months

Tier 2b sites – Those that may take 13-30 months to make developable because of existing constraints

Tier 3 sites – Sites that require more than 30 months to reach development readiness

Throughout this process, in many cases, expert judgment prevailed over data limitations in evaluating the inventory of land available for jobs using professional judgment and not just the calculations generated by the VBLM.

Attached to this memorandum is the executive summary of the March 2020 Clark County Employment Land Inventory Update described above. Without the level of analysis provided in this update, the Clark County Council and elected bodies in the various cities do not have adequate information to determine what our current inventory of available land for jobs is and whether or not additional land needs to be added to urban growth boundaries to accommodate jobs and meet the mandate of jobs-to-housing balance as required under the Growth Management Act.

We acknowledge that given its bandwidth and time constraints, it would be difficult for existing County staff to prepare the type of analysis that is described above and is necessary. We would request that the County allocate funds to engage in this level of detailed analysis and employ a consulting firm to do so. Community participation in this process would be essential and NW Partners would be pleased to be at the table. With the additional six months the legislature has provided to Clark County to finalize its 2025-2045 Plan, surely sufficient time exists to accomplish this.

There is already much disagreement between staff and private sector planners and engineers over how much industrial land will develop over the top of critical areas and buffers on such lands. Staff has assumed 50% of such areas will redevelop. The record reflects in a report from those that actually permit land for development that the percentage of environmentally constrained land that will convert is far lower. To date, the information provided by the VBLM is about quantity of land available. This is a one-dimensional view. The availability of net acreage for development due to environmental constraints, availability of property for sale and other factors that will truly advise decision-makers on accurate inventory has not yet been provided and we would encourage the BOCC to direct staff to take a far more in-depth look at available lands for industrial jobs, working with an outside consultant to do so.

In our view, the BOCC does not have enough information to presently determine if Clark County and its cities have enough developable land available to meet the community's need for jobs for the 2025-2045 period.

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As the Report states on page 13, “in order to ensure that Clark County maintains its current flexibility for future job growth, assumptions within the allocation model should be adjusted to account for on-the-ground information about what is actually feasible during the next 20 years.”

Thank you for your consideration of these comments.

SWH:cjh

cc: Oliver Orjiako
Jose Alvarez

EXECUTIVE SUMMARY

In 2016, the Columbia River Economic Development Council (CREDC) produced a detailed report that identified large sites suitable for new employment across Clark County. Supported by two stakeholder advisory groups, the 2016 Employment Land Study defined criteria by which to evaluate potential employment sites. This report presents an update to the 2016 analysis and updates an understanding of employment sites across the county. Additionally, a new, robust online application, presents the employment lands inventory with detailed findings for each employment site.

2019 Inventory Findings

A total of 42 sites greater than 20 acres are potential employment sites in Clark County. Together they total approximately 3,250 gross acres in Clark County's cities and unincorporated UGA boundaries. Additional findings follow:

- These sites include: 14 Tier 1 sites, three Tier 2a sites, 23 Tier 2b sites and two Tier 3 sites.
- Sites comprise 1,520 net buildable acres and deducting constrained acres total more than 1,130 acres.
- A total of 24 sites are single-owner sites, requiring less site aggregation and typically aggregate fewer tax lots.
- 67% of sites or 28 sites are less than 50 gross acres. Seven sites are larger than 100 acres.

Site Selection Criteria

Each site met the following criteria to be considered for the inventory:

- 20 gross, contiguous, vacant or underutilized acres
- Located within municipal or Urban Growth Boundaries or Urban Reserves
- Zoned or planned for commercial, mixed-use – employment, or industrial uses.

Tier Definition

The sites were then assigned to tiers that described the time required to make the sites ready for new development, as follows:

- **Tier 1:** 6 months or less
- **Tier 2a:** 7-12 months
- **Tier 2b:** 13-30 months.
- **Tier 3:** more than 30 months.

Exhibit ES1. Distribution of Sites by Tier and Gross Acres, 2019

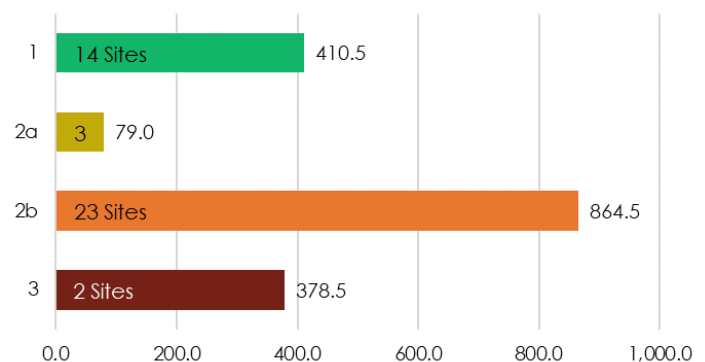
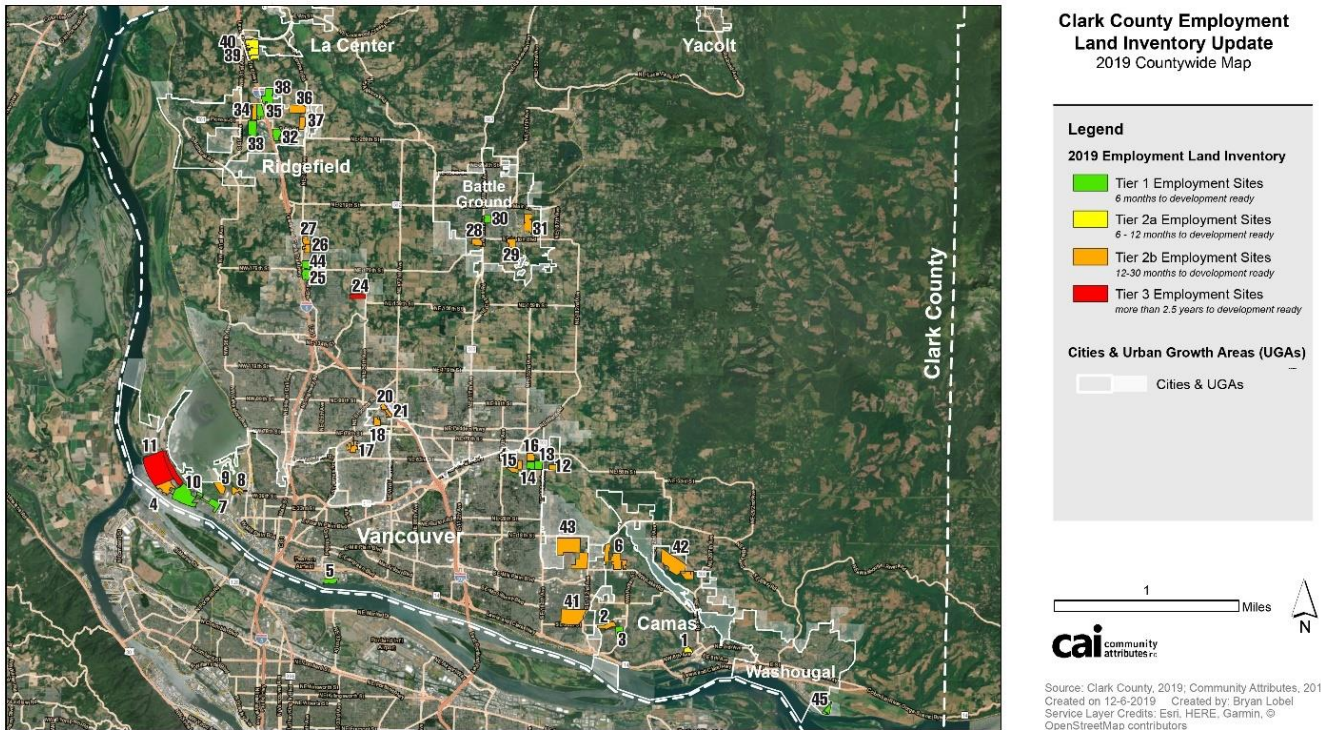


Exhibit ES2. Clark County Employment Lands Inventory, 2019



- Vancouver, Clark County's largest city, has the most sites with 18; these sites represent 55% of total gross acres of employment sites.
- Camas has five sites representing 15% of total gross acres.
- Ridgefield has seven sites, totaling 13% of total gross acres.
- Every jurisdiction except La Center has at least one Tier 1 site.
- La Center's two sites are both Tier 2a sites.

Comparison of 2016 with 2019 Inventory Findings

The 2016 inventory identified 56 sites totaling approximately 3,950 gross acres, while the 2019 study identified 42 sites totaling 3,250 acres. Among the 56 sites identified in 2016, 24 are included in the 2019 analysis. Notable differences from 2016 to 2019 include:

- A total of 10 sites from 2016 have been developed or are potentially under development based on stakeholder feedback and analysis.
- Among the 56 sites from 2016, 15 were excluded in 2019 based on site selection criteria. Some sites are classified as built by the Vacant Buildable Lands Model, some sites are classified as residential zoning or other non-employment zones.
- A total of seven sites identified in 2016 were excluded based on stakeholder feedback collected in the 2019 process. Feedback indicates that some sites are highly constrained, unwilling to transact, or are not interested in appearing in the inventory.