

From: [Rebecca Messinger](#)
To: [Sonja Wiser](#)
Subject: FW: Friends of Clark County Comments on Housing
Date: Tuesday, May 7, 2024 8:34:19 AM
Attachments: [Housing Comments.docx](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Please see the attached comments. Thank you Sonja.



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

564-397-4305



From: Ann Foster <annfoster5093@gmail.com>
Sent: Monday, May 6, 2024 5:43 PM
To: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: Friends of Clark County Comments on Housing

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.

Hello,
Please accept a letter from Friends of Clark County relevant to Housing on Tuesday's agenda.

Best regards,
Ann Foster
FOCC



Friends of Clark County

PLANTING THE SEEDS OF RESPONSIBLE GROWTH

April 22, 2024

TO: Council Chair Medgivy, Councilors Belkot, Marshall, Bowerman, Yung, County Manager Kathleen Otto, Director Community Planning Oliver Orjiako

This letter is to supplement the letter FOCC¹ provided on April 22, 2024. We appreciate the opportunity to provide further comment on the population allocation issue that will come before the Council for a hearing on May 7, 2024. At the outset we want to emphasize that we have reviewed the Competinomics memorandum provided by the development community, the comments by the development community and the staff report.

At the outset, we want to express a specific concern that the Consultant does not seem to have any specific background in Washington Growth Management Act, does not list any county or city as a client regarding Growth Management Act issues. The consultant's resume does not even mention any work in Washington, much less work for any entity working on and/or developing comprehensive plans that comply with the statutes, rules and policies set forth by the legislature, embedded in our statutory and regulatory schemes and supplemented by policies and guidance from the Department of Commerce. In addition, there is nothing in the CV that indicates a working knowledge of any of Washington's laws, rules and policies regarding the development of comprehensive plans that comport with the Growth Management Act.

Our concerns became more acute after a review of the references in the Staff Response to the Competinomics report that the report fails to provide specifics as to how its suggestions, methodology and/or conclusions comply with the requirements of the GMA regarding Housing Allocation. In addition, we have been through years of working through the process to update and implement our VBLM and, yet, even though this hearing is supposed to be specific to population allocation, the report seems to want to revamp the VBLM, at least with regards to employment allocations. It is also concerning that the Building and Development Industry (now designating themselves under the new moniker of Northwest Partners) with their resources would hire someone without a huge breadth of experience in Washington GMA issues.

Moreover, the Building Industry and Development communities now state in their most recent letter that the issues regarding the VBLM have not been settled. First, there was a BLPAC which came to specific findings and conclusions and provided those to the Council early in January. Almost immediately, the Building Industry and Development Community (including

¹ FOCC is a 501(c)(3) Washington State non-profit corporation that works collaboratively with community partners and policy makers to keep Clark County a beautiful and healthy place to live, work, and play. FOCC works collaboratively with community partners to improve the quality of life and economic viability of our community, for all citizens of Clark County. FOCC supports smart growth that allows for economic development in balance with protecting the area's precious resources and community assets. Many members and supporters of FOCC are landowners and residents of Clark County. FOCC Board members, staff, supporters and regular members regularly participate in the many public processes by writing emails, letters, and providing testimony at public hearings concerning many land use and quality of life issues.

those who had previously served on BLPAC) requested that the Council essentially disregard BLPAC's work, start over and create a new VBLM. Almost 2 years ago, on June 7, 2022, after many contentious hearings over almost 18 months from the completion of the work of the BLPAC, the Council voted to approve a VBLM and a Buildable Lands Report was submitted to the Washington Department of Commerce. The Council voted to approve the VBLM and the Report to Commerce so that they could be "lawful and reasonably defended"² which was based on the strong recommendation of staff and the full support of County Manager Kathleen Otto.

FOCC recognizes that some portions of the VBLM were adjusted based upon the requirements of the new legislation but staff made those adjustments (see Issue Paper #5). However, those adjustments do not require the VBLM process to be reopened.

Finally, regarding our concerns, it appears that the CCAR is now, contrary to all the work, new legislation and statements regarding the importance of affordable housing, now is supporting a policy that says the County must take into consideration providing expensive single-family residences for *high income earners* that are moving to our community from Multnomah, Clackamas and Washington Counties in Oregon. It is extremely disturbing with all the hurdles that the County and our cities are going to have to overcome to meet the requirements of the new laws regarding affordable housing, the CCAR is choosing to focus on the lack of expensive single family residences for high income earners coming from out of state.

Putting those concerns aside, we have reviewed the staff response to the Competinics report. We are grateful that our staff had the time to diligently and specifically evaluate the report and raise the concerns that our now presented to the Council.

We also join in the City of Vancouver's letter and comments dated May 6, 2024 as well as the most recent letter provided by Futurewise dated May 6, 2024.

Regards,
Ann Foster, President
Friends of Clark County

² Comments by Councilor Olson June 7, 2022 at