

From: [Jose Alvarez](#)
To: [Jeffrey Delapena](#)
Cc: [Jenna Kay](#); [Oliver Orjiako](#)
Subject: FW: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan - 2nd email
Date: Thursday, June 6, 2024 3:40:50 PM
Attachments: [image001.png](#)
[image002.png](#)
[NWPPartners_Population-Employment_Allocation_CCPC_Comment-3_20_FINAL.docx](#)
[Land_for_Employment_Memo_Final.pdf](#)
[pop-employ-allocation-land-for-construction-jobs.pdf](#)
[NWPPartners_VBLM_briefing_FINAL_8_28.pptx](#)
[Population_forecast_2025_Comp_Plan.pdf](#)
[NW_Partners_Letter_of_Comment_to_Clark_County_Council-Population_Forecast-FINAL.pdf](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Jeff,

Please include in EIS scoping comments, per Oliver's email.



Jose Alvarez he/him/his
Program Manager II
COMMUNITY PLANNING

564.397.4898



From: Horenstein, Stephen W. <SHorenstein@schwabe.com>
Sent: Thursday, June 6, 2024 2:07 PM
To: Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Cc: Helle, Catherine J. <CHelle@schwabe.com>
Subject: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan - 2nd email

Jose,

Per your direction of yesterday in response to my SEPA comment here are the submittals submitted in the land use process. the NW Partners submittals. To be considered as part of the EIS process.

Again, please distribute internally as appropriate.

Many thanks...Steve

[Stephen Horenstein](#)

—

Shareholder

[D: \(360\) 597-0806](tel:(360)597-0806)

[C: \(360\) 921-4744](tel:(360)921-4744)

shorenstein@schwabe.com

Schwabe

From: Noelle Lovern <Noelle@biaofclarkcounty.org>

Sent: Thursday, June 6, 2024 1:35 PM

To: Horenstein, Stephen W. <SHorenstein@schwabe.com>; Helle, Catherine J. <CHelle@schwabe.com>

Subject: FW: {External Email} Fwd: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan

Here you go.

From: Noelle Lovern

Sent: Wednesday, June 5, 2024 4:51 PM

To: Horenstein, Stephen W. <SHorenstein@schwabe.com>

Subject: RE: {External Email} Fwd: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan

I think this is it.

From: Horenstein, Stephen W. <SHorenstein@schwabe.com>

Sent: Wednesday, June 5, 2024 4:36 PM

To: Noelle Lovern <Noelle@biaofclarkcounty.org>

Subject: {External Email} Fwd: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan

WARNING: This email originated outside of the BIA of Clark County Network. Caution should be taken when opening attachments, clicking on links or taking action.

See below. Jose is being difficult. Can you pull the NW partners docs? I have the competinomics and Schwabe letter.

Thanks

Sent from my iPad

Begin forwarded message:

From: "Horenstein, Stephen W." <SHorenstein@schwabe.com>

Date: June 5, 2024 at 4:14:56 PM PDT

To: Jose Alvarez <Jose.Alvarez@clark.wa.gov>

Cc: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>, Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>, "Helle, Catherine J." <CHelle@schwabe.com>, Jenna Kay <Jenna.Kay@clark.wa.gov>, Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>

Subject: Re: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan

Thanks José. happy to provide additional copies of that would be helpful.

Best...Steve

Sent from my iPad

On Jun 5, 2024, at 4:10 PM, Jose Alvarez <Jose.Alvarez@clark.wa.gov> wrote:

Mr. Horenstein,

Each of the documents you referenced are in the index of comp plan record. For those comments to be considered as part of the EIS scoping process you need to submit them specifically as an EIS scoping comment.

<<https://clark.wa.gov/>>

[image001.png] <<https://clark.wa.gov/>>

Jose Alvarez he/him/his
Program Manager II
COMMUNITY PLANNING

564.397.4898

[image002.png] <<https://www.facebook.com/pages/Clark-County-WA/1601944973399185>> [image003.png] <<https://twitter.com/ClarkCoWA>>

[image004.png] <<https://www.youtube.com/user/ClarkCoWa/>>

From: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Sent: Wednesday, June 5, 2024 3:33 PM
To: Horenstein, Stephen W. <SHorenstein@schwabe.com>
Cc: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Helle, Catherine J. <CHelle@schwabe.com>; Jenna Kay <Jenna.Kay@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: RE: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan

Good day, Steve,

Documents and communications related to the Comprehensive Growth Management Plan are added to the Index of Record as they are received.

Adding staff to advise if additional copies would be needed, in order to be considered for EIS Scoping.

From: Horenstein, Stephen W.
<SHorenstein@schwabe.com<<mailto:SHorenstein@schwabe.com>>>
Sent: Wednesday, June 5, 2024 2:54 PM
To: Cnty 2025 Comp Plan
<comp.plan@clark.wa.gov<<mailto:comp.plan@clark.wa.gov>>>
Cc: Helle, Catherine J. <CHelle@schwabe.com<<mailto:CHelle@schwabe.com>>>
Subject: Comments for SEPA process- 2025-2045 Comprehensive Growth Management Plan

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.

The record for the above referenced comprehensive growth management planning process contains numerous written communications from Northwest Partners for a Stronger Community as well as one letter from Schwabe. The NW Partners submitted documents includes but is not limited to the report prepared by Competinomics. Please add each of those written comment documents to the record for the SEPA process and

consider them substantively and as part of scoping the Draft Environmental Impact Statement for the comprehensive growth management planning process. Please let me know if you need additional copies of any of then above referenced submittals

Thank you.

Steve Horenstein
Schwabe and Northwest Partners
For a Stronger Community
700 Washington Street
Suite 701
Vancouver WA 98660
360 697 0806

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Chair Karl Johnson
Clark County Planning Commission
PO Box 5000
Vancouver, WA 98666-5000

Re: Clark County Population and Employment Allocation

Dear Clark County Planning Commission Members,

NW Partners Comprehensive Plan Taskforce is a coalition of organizations that represent a broad swath of the business community in Clark County. Collectively, our members are responsible for creating the critical jobs and housing that allows hundreds of thousands of Washingtonians to call Clark County home.

Determining capacity for housing and jobs to manage future growth are some of the most critical steps in the 2025 Comprehensive Plan update. Housing and jobs are intrinsically interconnected, and the County has the responsibility to plan and accommodate an ample supply of land for both.

NW Partners Taskforce is concerned that the current draft Population and Employment Allocation proposal includes some significant assumptions that – if left unchanged – will greatly diminish the ability of the County and local cities to provide for critically needed housing and jobs.

For the 2025-2045 planning cycle, Washington Department of Commerce (DOC) projects that Clark County will need 103,000 housing units of which 60 percent aims to be products attainable 80% AMI and below. This means our county needs to produce approximately 430 housing units per month to match the need projected by DOC. Alongside housing, Clark County is to plan for an additional 65,071 jobs in the UGA (88,000 county wide).

Below are our collective recommendations for refining the Population & Employment Allocation to ensure a feasible, proactive plan.

1. Provide Cities Maximum Flexibility to Plan Locally - Method A is Best

House Bill 1220 amended the Growth Management Act (GMA) to instruct local governments to “plan for and accommodate” housing that is affordable at all income levels. As part of this process, the Department of Commerce prepared a guidance tool to

help assist counties in crafting their local housing allotments. It is called the Housing for All Planning Tool (HAPT).

The HAPT is a statewide tool that is not refined for the specific needs of Clark County. The HAPT was not designed to produce exact allotments for housing according to income bands. It is a modeling tool that will produce generalized projections that require flexibility and fine tuning to reach a reasonable housing allotment that addresses the needs of each individual community.

County staff used the HAPT to project the housing needed for each jurisdiction in the upcoming 20-year planning cycle. From the various potential outputs of the HAPT, staff has recommended two, Method A and Method B. Below is our analysis of both:

1) Method A provides more flexibility for jurisdictions to address the specific and unique characteristics of their community including population percentages in each economic band. In the case of Ridgefield and Camas, Method A allows a pathway for market demand to continue to shape these communities within the framework of HB 1220. Method A does not place Ridgefield and Camas under unnecessary and unrealistic demands to restrict development to specific housing products regardless of unique market demand specific to each community.

2) Method B effectively restricts local jurisdictions to planning and accommodate growth through a statewide lens without addressing the unique needs and characteristics of their community. Method B indicates that neither Camas nor Ridgefield are justified in adding new housing for people making over 100% of the Area Median Income (AMI).

The restrictive Method B runs contrary to the need for local strategies and the priority for flexibility that Clark County set for the 2025 Comprehensive Plan Update. The letter from the City of Camas must not be ignored. Camas' concerns with adopting the restrictive Method B are valid and should be addressed. We echo the same concerns.

****For these reasons, we ask that the Planning Commission recommend the County Council adopt Method A.**

2. Construction Operations Require Land Capacity – Recommend Allocating Land Capacity for 6500 Construction Jobs

While there are many concerns regarding the employment allocation, we are highlighting a couple of top concerns. Overall, NW Partners Comprehensive Plan Taskforce believes that the Employment Allocation needs significant work prior to approval.

Construction companies require significant land to meet their operational needs. These companies need both administrative spaces to support customer service, sales, accounting, construction meetings, and marketing, as well as indoor and outdoor areas to store equipment and machinery. The County acknowledges the need for land capacity for jobs as it provides guidance in its development code. It discusses multiple construction related uses and their associated development that are either permitted or prohibited in certain zones.

In the most recent iteration of the Population and Employment Allocation staff report, construction jobs were reported to require zero acres in the land capacity. In reviewing previous runs of Vacant Buildable Lands Model, construction jobs have customarily been allocated land capacity. Now, as construction jobs are growing faster than most other sectors in Clark County, it is imperative that adequate land capacity is allocated to keep pace with continued growth.

Please see the attached slide deck that contains images of various construction company’s operations and footprints. We have included a sampling of companies that range for boutique operators to regional corporate campuses.

****For these reasons, we urge the Planning Commission recommend that the County Council approve adequate land for construction companies and direct staff to revise the VBLM analysis to fully account for these jobs.**

3. Over Estimating Jobs for Mixed-Used Projects – Refine Mixed-Use Job Assumptions

As part of the VBLM process, the County reviews each zone in each jurisdiction and applies an expected yield assumption to determine how many jobs or housing units it can accommodate. One especially unique situation is where zones allow for a variety of uses. In these instances, the VBLM assumes that either jobs or housing will occur and applies a likelihood to both (e.g. in the HX zone in Vancouver, 80% of the time housing will occur and 20% of the time jobs will occur).

This exercise becomes particularly challenging when the uses are assumed to occur at the same time. This is the case with mixed-use zoning that encourages – or requires – a commercial component as part of a residential development.

Table 1

Zone	Houses Per Acre		Jobs Per Acre	
General Commercial	24.8	50%	20	75%
Waterfront Mixed Use	26.2	100%	20	10%
Mixed Use	26.8	50%	20	75%
City Center	152.4	50%	20	75%
Community Commercial	79.3	50%	20	75%
Neighborhood Commercial	32.7	25%	20	90%
Riverview Gateway Mixed Use	65.9	50%	20	75%

Mixed-use projects most regularly include low intensity commercial uses on the ground floor of residential buildings. Many of these buildings exist in Downtown Vancouver. They feature ground floor retail space with multiple levels of housing located above. These ground floor uses are oftentimes focused on meeting the needs of the building residents, and include coffee shops, laundromats, and small restaurants, all of which employ people

at a far less dense rate than assumed in Table 1. These commercial uses are best described as providing an incidental number of jobs.

Absent a revision to the assumptions for jobs in mixed-use zones, the VBLM will greatly inflate the available land for jobs within Vancouver, even though this land does not actually exist.

****For these reasons, we urge the Planning Commission to pursue revisions that treat mixed-use zones in Vancouver the same as in all other cities and modify the VBLM to adjust downward the probability that jobs will occur in mixed-use zones such that no zone includes an assumption that jobs and housing will occur greater than 100% of the time.**

Planning of this magnitude is daunting and for that reason we hope to be a resource. We can provide clarification for our recommendations as needed or answer any additional questions you might have. 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:





Memorandum

VIA EMAIL

To: Clark County Planning Commission

From: Stephen W. Horenstein

Date: March 20, 2024

Subject: Land for Employment

This is to supplement information you receive from Northwest Partners for a Stronger Community (NW Partners) and provides information regarding the need for more land to be designated for employment as part of the 2025 – 2045 update to Clark County’s Comprehensive Growth Management plan.

There are a number of outstanding issues that make it very difficult for decision makers to accurately predict the acreage of land necessary to accommodate the employment projection provided to the Planning Commission for this hearing.

The issues of a) overestimation of employment in mixed-use zones and b) eliminating land for construction employment are just two examples of many variables that have been modeled in various ways by differing groups,, and that have not yet been ground truthed by testing the modeling against what in real life is available.

One such study prepared by MacKay and Sposito shows the probable undercount of potential employment creation due to the presence of wetlands and other critical areas on private property. If the Planning Commission hasn’t had the opportunity to review the study it should request copies.

Another study commissioned by NW Partners previously provided to county staff differs considerably from the County’s modeling of the impact of wetlands in critical areas on the ability to develop land zoned for employment. This study is based on wetland and critical area conversion for actual development projects rather than simply modeling.

Clark County Board of County Councilors has already adopted employment projections for the 2025 – 2045 planning cycle. These projections come from the Department of Employment Security and reflect job growth over the 20-year period of an additional 88,100 jobs. However, staff has since backed out a certain number of jobs for government, construction and rural workers and those that work from home. The net number of land needed for jobs coincidentally and at least on its face means that we actually now have land for 20 more jobs than projected. Where is the

Memo to: Clark County Planning Commission

March 20, 2024

Page 2

data behind these adjustments that have taken us from an undersupply of land to just the right amount?

The question is, do we have enough land available to accommodate employment, especially given the pressure on the land supply to create much more housing than has previously been necessary. The answer to this question in our view is not likely and the information and data is not yet available to make this decision. There are several reasons for this:

Where is the data supporting the reduction from a projection of 88,100 jobs as provided above?

There is conflicting information on the availability of net acreage for employment given the lack of agreement on the impact of wetlands and critical areas of the land supply.

It is likely that the number of those employed in mixed-use development is overstated.

Vancouver staff has indicated a willingness to consider converting land zoned for commercial development to housing purposes. If this does occur, how does it affect the land supply for employment?

The numbers set forth in the VBLM are based on a modeling exercise. There has been no sampling or ground truthing the information.

We have recently been provided multiple versions of a chart entitled Employment Capacity and Allocation by UGA. The first of these charts identified a lack of capacity for just under 30,000 employees. The current version of this chart identifies a slight over capacity of land for employment. Where is the data behind these changes (not just conclusory numbers)?

The 2016 GMA plan included a Buildable Land Program to allow local governments to coordinate and analyze land supply to be sure they have enough land for development and the GMA plans are doing with their supposed to do. Was this monitoring conducted in the county and its various cities? If so, how does it play into the information provided in the land for jobs analysis provided in the current VBLM? Where that is annually compiled information?

Where are the sites located that will serve the community's need to create jobs?

Wetlands and critical areas are just one of the components that determines the ability to develop land. Has information been provided on the availability of transportation and other infrastructure improvements (water, sewer, power, storm water management, telecommunications services) to those sites staff considers available for job creation? In prior planning efforts, we have submitted information analyzing land based on readiness to be developed. Has that occurred here?

Information presented to the Planning Commission and Board of County Councilors is based on the Vacant Buildable Lands Model (VBLM) capacity report. This report analyzes what is considered to be vacant and underutilized land by zoning. It uses software logic analysis including

input from local jurisdictions. It is a macro look at available lands without regard for the ability to develop any particular parcel. How can a model determine if land is underutilized or is being used by its owner for his or her intended purpose and therefore not available for development?

The mapping of land for employment was completed in 2022. Much commercial and industrial development has occurred on vacant sites since then. Some of those sites have been rezoned other uses since that time. For example:

- Hewlett Packard is now developing 60 acres in Section 30
- Killian Pacific Converted 22 acres of commercial to residential
- Panattoni is building a large industrial park on Padden Parkway and is working on other industrial sites in Clark County
- Panattoni has built a large industrial park on 72nd Avenue just north and across from Costco
- Stein Beverage is building a 150,000 sf warehouse on 137th Avenue near Fourth Plain
- Pac Trust has built an industrial Corporate Park on 78th street
- 80 acre Costco commercial center in Ridgefield is under construction

These and other not listed here are large developments that have diminished our land for employment inventory, making the inventory before you inaccurate and in need of more work.

To date the information provided by staff in this GMA planning update is one-dimensional. Getting to an accurate understanding of land available for jobs is a multidimensional process in order to truly obtain any degree of accuracy. The information provided to date is based on a model that only looks at zoning. It makes assumptions without providing back-up data in order for decision makers to properly plan for our community over the next 20 years.

Many questions remain to be asked and many answers must be provided to decision makers. It is time for staff to show its work.

SWH:cjh

cc: Board of County Councilors
Oliver Orjiako
Jose Alvarez
Noelle Lovern
Justin Wood
Eric Golemo
Jamie Howsley
Ezra Hammer

Land Capacity for Construction Jobs



Rotschy, Inc

- Established in 1988
- One of the largest and most reputable excavation companies in southwest Washington
- NE 113th Circle, Vancouver



Rotschy, Inc.

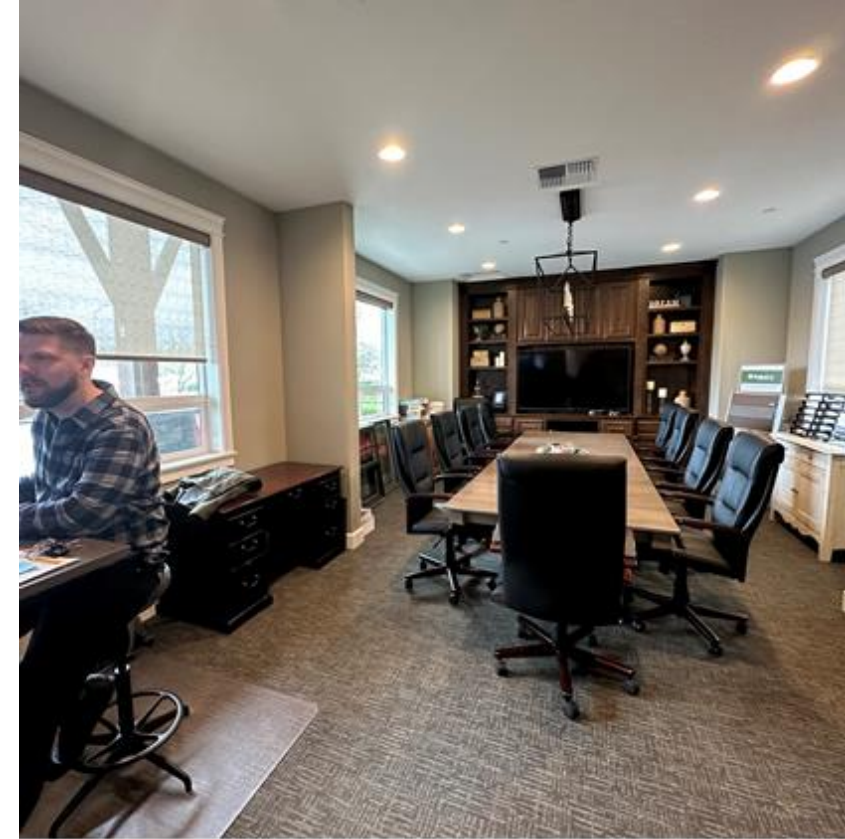
- Rotschy develops subdivisions, utilities, and lift stations of all sorts to public roads, highways, and bridges



Cascade West Development

- Cascade West operations is situated on 0.62 acres in Ridgefield, WA.
- Cascade West's building is 3260 sq ft.
- They are a full spectrum builder and developer.





Cascade West Development

- The operations space includes 12 workspaces used by employees weekly.
- There is space set aside for project supers who need space to print documents, full size construction plans, and have meetings.



New Tradition Homes

- New Tradition Homes began in 1987
- Builds new homes of high quality, enduring design and lasting value
- NE 113th Street, Suite 110 Vancouver, WA



Quail Homes

- Builder and developer specializing in empty nesters and multigenerational living
- NE Minnehaha Street

Bridge City Contracting

- A general contracting company specializing first in remodeling and renovation.
- Operations footprint in Battle Ground



Bridge City Contracting

N. Parkway Avenue, Battle
Ground, Washington 98604



Nutter Corporation

- Heavy civil construction
- Serving the Southwest Washington and Portland Metro Area
- From highways, to railroads and site development
- 200 employees working out of Clark County



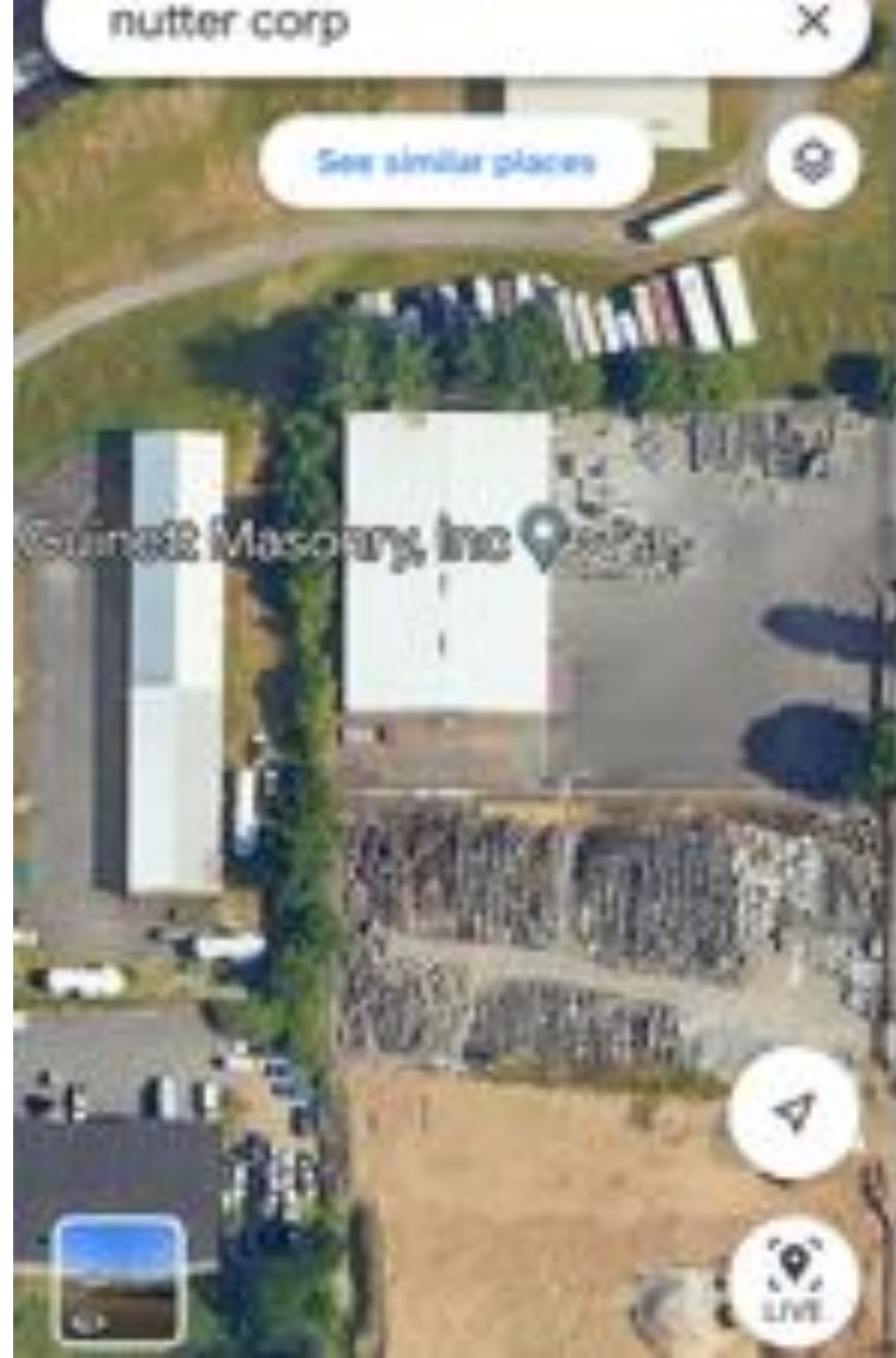
Nutter Corporation

- 11 acres of industrial land
- 18 employees per acre



Guinett Masonry

- 5 acres of industrial land
- 20 employees
- 4 employees per acre





NW PARTNERS
For a Stronger Community

Comp Plan 2025 Taskforce

VBLM Briefing



Topics

- Background and overview of VBLM 2021
- VBLM Residential Yield snapshot
- Refining assumptions
- Clarifying critical areas conversion rates
- Lands for jobs scarcity
- Density creating a new Clark County identity
- Questions for VBLM Draft refinement



The Role of VBLM in the Comprehensive Plan Update

- The Vacant Buildable Lands Model (VBLM) is a modeling tool:
 - For evaluating urban area alternatives during Comprehensive Growth Management Plan updates
 - For monitoring growth patterns during interim periods.
 - For analyzing potential residential and employment capacity of each UGA based on vacant and underutilized land classifications
 - For determining the amount of urban land needed to accommodate projected population and job growth for the next 20 years
 - For analyzing land consumption or conversion rates on an annual basis



Vacant Buildable Lands Model (VBLM) vs. Buildable Lands Report (BLR)

VBLM- the model for tracking land conversion/consumption, growth patterns, and the availability of developable land.

BLR- the report that is required by GMA to convey:

- 1) If residential development in the UGA is meeting the densities set in the comprehensive plan

- 2) If there is adequate land supply in the urban growth areas to accommodate the population growth on a 20-year planning horizon



What happened with the 2021 BLR?

- Consultants ECONorthwest & AHBL assisted with updates to the methodology
- Council appointed the Buildable Lands Project Advisory Committee (BLPAC) which met 8 times between Dec. 2019-Jan. 2021.
- BLPAC provided recommendations to the Council re: updates to VBLM assumptions.
- One major recommendation from BLPAC was regarding the use of Achieved Density vs. Target Density.
 - The BLPAC was split on whether to use achieved density in the VBLM; however, the County is required to consider achieved densities, whether they are used in the VBLM or not.
 - BLPAC had concerns regarding using achieved density (actual density since the last evaluation) without consulting the jurisdictions to refine the data by removing outliers and anomalies.
 - Ultimately, Council approved the BLR using Achieved Density.



Findings from BLR 2021

- From 2016 to 2020, there were 21,121 housing units developed in urbanized Clark County
- 60% of urban Clark County residential development from 2016 to 2020 was single-family housing units
- All cities and the Vancouver met their residential density targets
- The population growth rate in Clark County since 2015 **exceeded the rate assumed** by the 2015-2035 Comprehensive Plan, thereby increasing potential need for employment lands
- There are **6,720 net buildable acres** in Clark County urbanized areas that can accommodate the remaining population through the **2035** planning horizon



Snapshot-Land Use Capacity

Net Buildable Acreage 2021	Net Buildable Acreage 2023	Acres Converted from 2021-2023
6,720	6,041	679

VBLM Land Use by Population Capacity	
Adopted Population Forecast for 2025-2045	718,154
Current Clark County Population	527,400
Added People through 2045	190,754
VBLM Land Use by Population Capacity	105,883
Number of People NOT Accommodated in the 2023 Draft (Delta between Forecast/Current Population)	84,871

Snapshot-Housing Units Need

20-year Housing Unit Need in Clark County by Income Brackets	
Total Housing Need	103,475 units
0-30% AMI Non-Permanent Supportive Housing	12,030 units
0-30% AMI Permanent Supportive Housing	7,393 units
30-50% AMI	16,188 units
50-80% AMI	15,661 units
80-100% AMI	9,011 units
100-120% AMI	8,534 units
120%+	34,658 units
Emergency Housing	3,821 units

VBLM & the 2025 Comprehensive Plan Update

- How could 2023 VBLM draft assumptions/projections fall short in accurately planning for the projected 718k population and 269k jobs needed by 2045?
 - Critical areas conversion is overestimated.
 - Critical areas conversion rates are declining due to new and developing legislation and ordinances governing buffers and other criteria.
 - There is simply not enough buildable acres in the current VBLM to accommodate larger employers and their workforce.
 - A healthy workforce ecosystem must have adequate land for jobs, affordable housing, and safe infrastructure.
 - Density is creating its own identity and culture.
 - Clark County is currently the second most dense county in Washington with density doubling every 30 years.



Planning Assumptions for Improved Accuracy-VBLM

- Based on the real-world experience in the development community, there should be modifications to these assumptions to produce the most accurate model:
 1. Critical areas deductions (% of critical lands that will not convert)
 2. Target density vs. achieved density
 3. Infrastructure deductions
- The VBLM assumes **50% of critical areas will convert** for residential development. This is an unrealistic assumption which will result in an overestimation of developable land and ultimately a shortage of acreage to accommodate the projected growth.
 - The planning assumptions that impact the VBLM can be found on page 133 (PDF page) of the current Buildable Lands Report: <https://clark.wa.gov/community-planning/buildable-lands-report>

Preserving Critical Areas

Critical areas ordinances preserve the natural environment, wildlife habitats, and sources of fresh drinking water:

- Wetlands inventory (NWI, high quality, permitted, modeled) with 100-foot buffer
- Habitat areas with 100-foot buffer
- Species areas with 300-foot buffer
- Riparian stream buffers by stream type
- Designated shorelines
- White oak mitigation

Critical areas regulation address public safety by limiting development in areas prone to natural hazards like floods and landslides.

- 100-year floodplain or flood fringe
- Slopes greater than 15 percent (>25% for City of Vancouver)
- Land slide area that has active or historically unstable slopes
- Hydric soils with 50-foot buffer

****At what rate are critical areas actually converting?**



Overestimating Critical Areas Conversion is Costly

- Developers have two general options when encountering critical areas:
 1. Avoid developing on or around critical areas – which means these critical areas will not convert
 2. Develop critical areas and mitigate (wetland mitigation bank, transfers, buffer averaging, etc.) –which is costly and often makes a project not economically viable
- Using flawed assumptions for converting critical areas will result in an overestimation of buildable land in Clark County and lead to shortages when accommodating future growth.
 - Staff contacts: Jenna Kay- jenna.kay@clark.wa.gov Brent Davis- Brent.Davis@clark.wa.gov



Critical Areas Assumptions Must Account for these Ordinances

- Requirements continue to increase, decreasing the conversion rate of critical areas
- On March 7, 2023 the Clark County Council voted to adopt its updated critical areas ordinance in accordance with DOE & the State
 - Industry experts: Francis Naglich: Francis@eco-land.com Kurt Stonex: kstonex@mackaysposito.com



Critical Areas Conversion Rate Case Study

- Goals of the study:
 1. Discover what percentage of critical areas on average truly convert (direct wetland impacts & buffer reductions)
 2. What is the average discrepancy between mapped critical areas and what is found in the field
- Scope of study: 9 total projects, 3 from each of the following jurisdictions:
 1. Vancouver/UGA
 2. Battle Ground/UGA
 3. Camas/UGA
- Preliminary findings show that the actual conversion rate for critical areas is much less than 50% assumed in the 2023 VBLM Draft
 - In many cases the actual conversion rate is only 20%
 - NW Partners is developing a final report well ahead of the VBLM Planning Assumptions Public Hearing

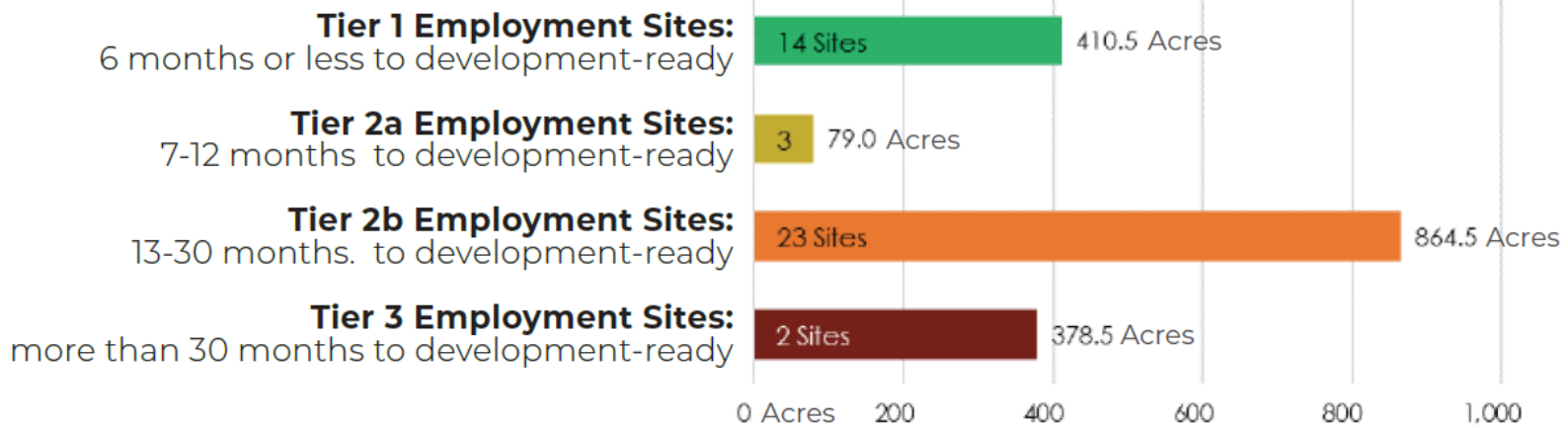


[Data Now Overtaken By Events]
CREDC Snapshot of Prior (2019)
Employment Lands Study Findings

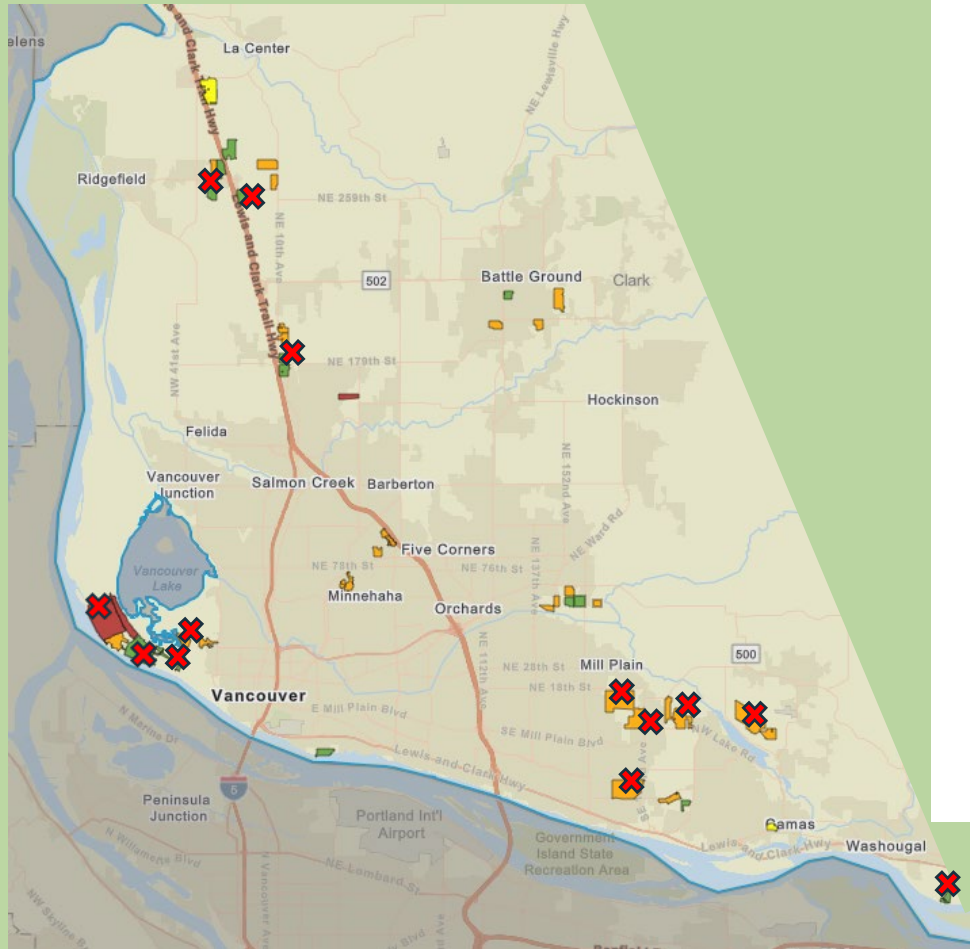
Inventory Findings

A total of ~~42~~ **42 sites** greater than 20 acres are potential large employment sites in Clark County. Together they total approximately ~~3,250~~ **3,250 gross acres** in Clark County's cities and unincorporated Urban Growth Area (UGA) boundaries.

Distribution by Tier & Gross Acreage



VBLM Ineffectiveness

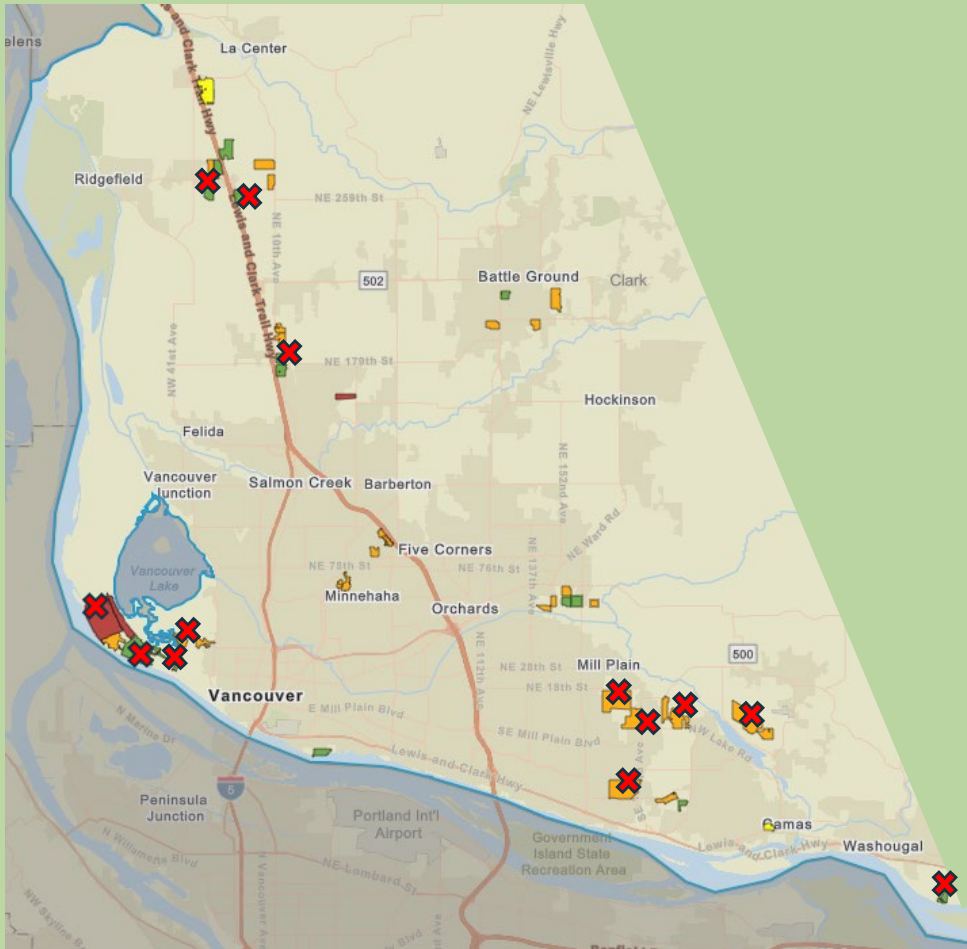


- An employer seeking a site with 5-20 acres or greater cannot be served by the VBLM’s inventory of disparately located fractional acreage offerings – the “net buildable” aspect of the model fails industrial use cases as the inventory diminishes; a multitude of tiny, unusable parcels remain unconverted and clog up the model more and more each GMA cycle

< Visual represents a top-of-mind notation of sites where development activity (not necessarily industrial) is occurring on employment land and also areas where significant encumbrance persists

VBLM Ineffectiveness (Industrial Lands)

Proposed Solution →



- Collaborate with CREDC on an application to the Economic Development Administration for Planning and Local Technical Assistance grant money: \$50k local match + \$50k grant
- CREDC to commission a feasibility study identifying 3-5 larger acreage “industrial park” sites, and establish objective prioritization factors. Goal: Realize viable sites into which new/growing industrial employers can be clustered and co-located
- This visionary concept stands to create efficiencies for aggregated parcel holdings (utilities/business formation/industrial land preservation, for industry use)

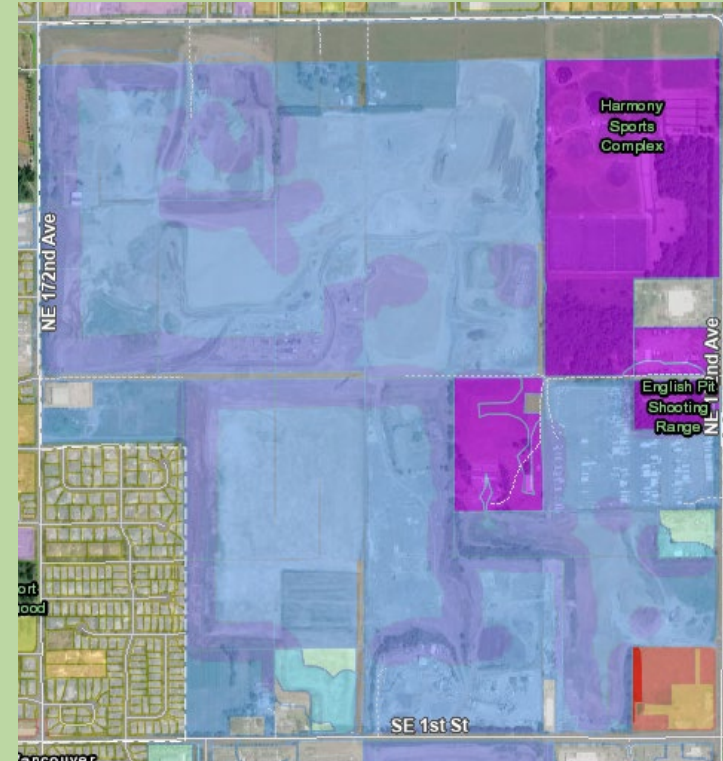
VBLM Inaccuracy

CREDC presented to Council three case studies (April 2022) that demonstrate VBLM inaccuracies staving off industrial developments

- Critical area conversion factor on the ground will realize at far less than the 50 percent critical industrial ratio proposed in the model --quite possibly at well under 25 percent conversion. (Dictated by market AND new WA state ecology regulations)

Solution: Right size the critical industrial areas conversion ratio to a realistic threshold. Reference ground-truthed data to establish new conversion rate for the VBLM.

***Consequence of status quo model =
no viable industrial lands for jobs into the future***



Economic Development FRDU & Comp. Plan Update

- CREDC has struggled to identify large parcels with ample services for prospective employers.
- The FRDU code may spur increased economic development
 - By offering access to large parcels of light industrial and commercial land
 - By attracting prospective employers who actively looking for land
- Presentation: https://clark.wa.gov/sites/default/files/media/document/2023-08/080923_WS_Railroad%20Advisory%20Board%20Freight%20Rail_0.pdf



OFM Density Data for Clark County

We are squished!

- Cramming more people into smaller homes spaced closer together with no yards or driveways and fewer critical areas to escape to is not the only option.
- Strategic expansion of the UGA can be carefully thought out and proactive if accurate assumptions are used.
- Clark County is the second most dense county in Washington. How much more density can we expect without altering the landscape, people, and culture?

Clark County Land Area- Sq Miles				
Year	1990	2000	2010	2020
Land Area	627.9	628.2	629.0	628.5
People/sq mile	379.13	549.55	676.25	800.82

**2023 People/sq mile = 839.15

Density is Doubling Every 30-Years Jeopardizing Clark County's Culture

- Density is creating its own identity
- Density changes the landscape as well as the people
 - Increase in public safety concerns
- Density is associated with higher rates of most mental health problems compared to rural areas:
 - 40% higher risk of depression
 - Over 20% more anxiety
 - Double the risk of schizophrenia
 - Report



Solutions to consider

- Reconfigure the Vacant Buildable Lands Model based on Target Density
- Factor in updated and real-world estimates of actual critical areas conversion rates
- Develop a map that indicates how the 2025-2045 forecasted population and projected jobs can be accommodated
- Explore strategic expansion of Urban Growth Areas:
 - For larger land parcels to attract major job creators
 - Due to the lower actual conversion rate of critical areas
 - To preserve community stability and strength
 - Retain fee simple homeownership options which attracts large employers



Exploration Questions

- How will the 2025 comprehensive plan address housing for the nearly 85k people that are not accommodated in the 2023 VBLM Draft?
- Will increasing density alone make up for the shortfall?
- How much density increase would be needed to accommodate the additional 85k people within the current UGA?
- Is there a way to strategically expand the UGA to continue the protection of critical areas?
- How does the 2023 VBLM Draft address HB1220 as to the impact it will have Clark County's future land use in the context of the comprehensive plan, especially housing and jobs?



Exploration Questions

- Is all publicly owned land excluded from the VBLM? Should deductions for schools and parks be introduced?
- What will happen to the tax base (amount and balance of revenue streams) if new and existing employers do not have space to realize productive business activity?
- Could FRDU be a solution to add more jobs and jobs land in Clark County, while increasing efficiency and decreasing VMT?
- Could an area or countywide AG study be conducted to identify what is “commercially viable” AG land under GMA?
- As the second most dense county in Washington, what level of density will be sustainable for Clark County?
- What is the vision for how Clark County will develop over the next 20-years?

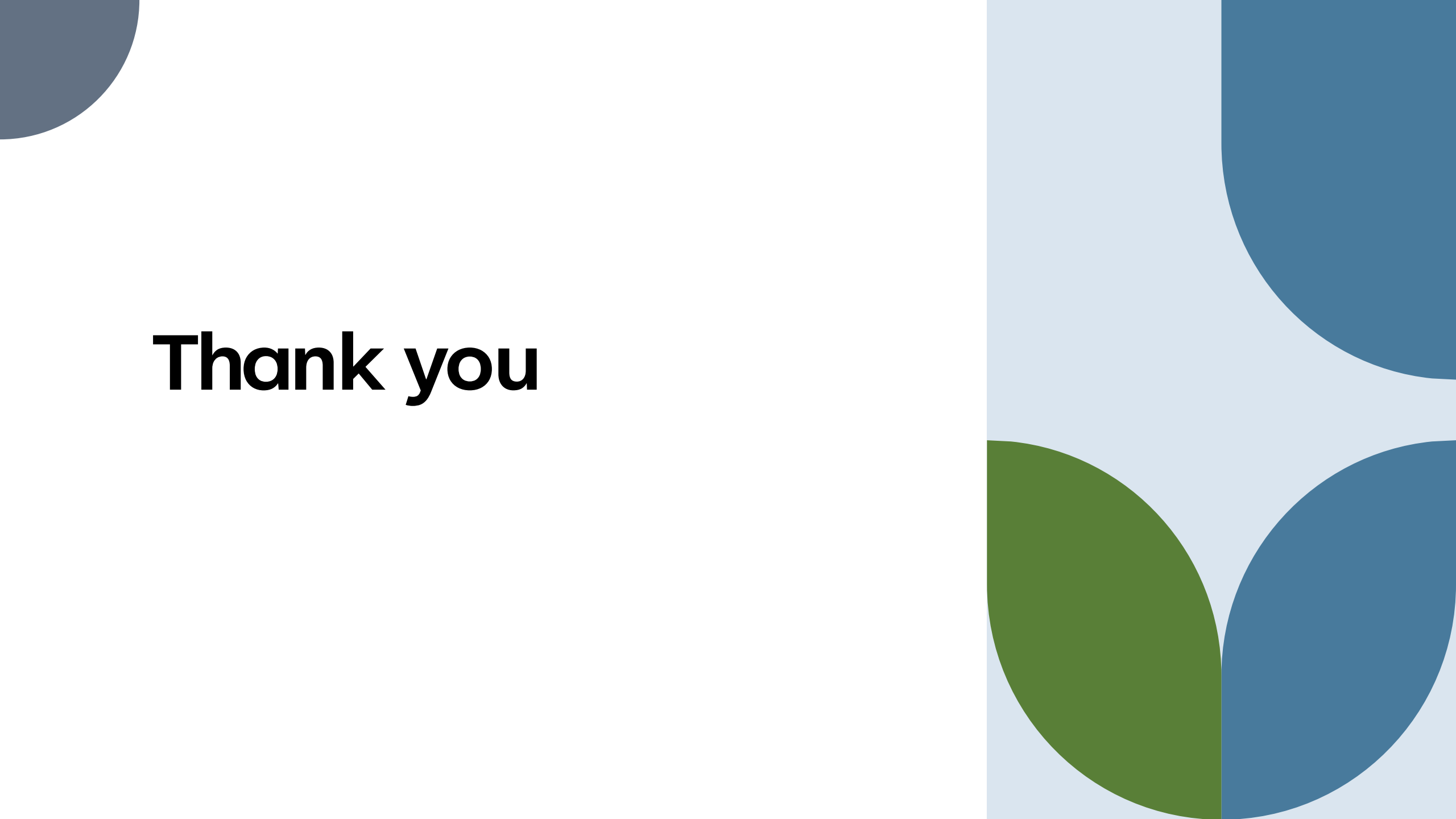


“ We are squished.

Betty Sue Morris

”

Thank you





103 E 29th St.
Vancouver, WA 98663
Tel: 360-694-0933
www.biaofclarkcounty.org



May 1, 2023

Chair Karen Dill Bowerman
Clark County Council
County Manager Kathleen Otto

PO Box 5000
Vancouver, WA 98666-5000

Public Comment & Concern: 20-year Population Forecast

Dear Chair Bowerman, Council Members, & County Manager:

On behalf of the Building Industry Association of Clark County (BIA) and our more than 750 member businesses, we would like to thank you for the opportunity to share our support for approving a 20-year population forecast at no less than 1.45%.

Our association is made up of builders, designers, developers, engineers, skilled tradesman, suppliers, and various supporting industries. These are our members' professional roles, but our members are more than their business roles. They live, serve, volunteer, and raise their families in Clark County.

These members proudly champion the preservation of what has long been recognized as the American dream- homeownership. It saddens us to see the vision of owning, improving, inhabiting, and experiencing the ups-and-downs of life in a privately owned home pushed further out of reach of working-class households. These households are the backbone of our community, and we are proud to build the homes they live and grow in.

People come to Clark County seeking out this dream. Will they be disappointed to find it's no longer attainable? Getting the 20-year population forecast right is critically important. The population forecast is a crucial building block for addressing our community's current challenges of housing affordability and homelessness. Homeownership is not only a dream, but also a lifeline for those seeking their way out of generational poverty. In order of priority for diversity, equity, and inclusion initiatives, housing affordability must take a top slot on our agenda.

The 20-year population forecast is not a limitation Clark County will put on how many people will migrate to our beautiful region. It is a projection. This projection is

a planning tool. It will help Clark County and all the jurisdictions within the county to plan for the teachers, public service workers, law enforcement officers, social workers, nurses, and human services workers who want to live where they work. When the workers who are the backbone of our community cannot afford to live where they work, we lose the sense of community we are known for.

The 2025 Comprehensive Plan Update will shape our community for the next two decades. It will determine how prepared we will be to serve, protect, educate, transport, feed, nurse, and house the people who are coming to Clark County. We must give this projection our best effort and get it right.

The Building Industry Association of Clark County and its members urge the Clark County Council to approve a population forecast of no less than 1.45%.

Thank you for your time in advance. We know this is a long and arduous process and we look forward to working alongside this Council and staff to bring the 2025 Comprehensive Update to an optimal outcome for the community.

Sincerely,

Building Industry Association of Clark County & Members

Shawn Macfarlane	President	SummerPlace Homes Inc.
Curtis Gerke	Branch Manager	Landmark Professional Mortgage Co.
David Clark	CFO	TimberCrest Homes, LLC
Eric Golemo	President	SGA Engineering
Wade Stewart	Principle	Highland Opportunities, LLC
Nick Massie	Trainer	Rotschy Inc.
Kurt Stonex	Senior Engineer & Principal	Mackay Sposito
Shane Leitzke	General Manager/Co-Owner	NW HVAC Service, Inc.
Steve Veatch	President/ Co- Owner	NW HVAC Service, Inc.
Mason Lowry	Vice President	Right Turn, Inc.
Randy Massie	President	Columbia Allied Services
Jocelyn Cross	Sr. Development Manager	Hurley Development
Jon Girod	President	Quail Homes
Tracy Doriot	President	Doriot Construction
John E. Rose	Managing Broker	Rose Real Estate Group, Inc.
Jason Krenzler	Owner	Krenzler Homes, Inc.
Ryan Styger	Vice President of Land Acquisition	Pacific Lifestyle Homes
Aaron Helmes	Owner	Generations Homes Northwest
Shary Dallum	Vice President	Dalco Electric, Inc.
Sue Halme	Office Manager	Halme Excavating, Inc.
Justin Ross	Design Doctors	

Greg Kubicek	Construction Chief Executive Officer	Holt Homes, Inc.
Caleb Blanton	Construction Manager	New Tradition Homes
John VanDruff	President	Electronic Essentials, Inc.
Scott A. Hogan	Vice President & Manager	Clark County Title Company
Niall Glavin	Owner	Glavin Homes
Tana Mallory	President	Three 60 Decks
Erin J. Wriston	Chief Executive Officer	Kingston Homes
A.J. Gomez	President	Global Security & Communication, LLC.
Houston Aho	Acquisitions & Development	Aho Construction



April 17, 2023

Chair Karen Dill Bowerman
Clark County Council
County Manager Kathleen Otto
PO Box 5000
Vancouver, WA 98666-5000

Public Comment re: Clark County's Population Forecast for the 2025 Comprehensive Plan Update

Dear Chair Bowerman, Councilors, & County Manager,

The 2025 Comprehensive Plan Update will be the map that our community will follow to develop the next iteration of Clark County. Since the establishment of the Growth Management Act in 1994, the Comprehensive Plan Update has occurred three times. With the annual rate of growth Clark County has been experiencing, the 2025 Update will have a profound impact on the region's future. The success of the update falls on this Council.

The issue before this Council, the population forecast, is one of many building blocks that began with the Buildable Lands Report. When planning for a community of Clark County's population size and accelerated growth rate, every percentage point or fraction thereof holds the future thousands of households and community members in the balance. By law, this body is charged with prudent planning to ensure the development of our community is not disrupted and aligns with the vision we have for the future of Clark County.

Clark County has seen sustained growth over the past two decades which has repeatedly exceeded OFM's population forecasts. Both the recent published buildable lands report and U.S. Census data affirm this pattern of accelerated growth. Additionally, Clark County remains one of the most desirable communities in the Pacific Northwest to live, work, and play which is why in-migration will be a heavy factor over the next 20 years. Our coalition believes OFM forecast is severely underestimating the amount of in-migration our community will see through the next planning horizon. As such, NW Partners for a Stronger Community asserts that the

Office of Financial Management’s middle population forecast based on the annual average growth rate of 1.26% is uncomfortably low.

Supporting a Growth Rate Between the Middle and High Forecast

- According to the U.S. Census data presented at the Council’s workshop on April 5, 2023, Clark County grew at an annual average growth rate of 1.7% from 2010-2020.
- From 2020 to 2022, Clark County population grew by 17,589 people. According to the U.S. Census Data, Clark County was home to 503,311 people in 2020. In 2022, the Office of Financial Management (OFM) reported the county’s population at 520,900 residents.
- “The population projection adopted by Council in 2016 assumed an annual average growth rate of 1.26% over the 20-year planning horizon (Issue Paper 7). The growth rate since 2015 has been 10% over the five-year period (Figure 2) or an annual average rate of 2%.” (BLR, pg. 3). This is an underestimate of 0.74%.
- OFM itself asserts that 80% of Washington’s future population growth from now until 2050 will come from migration. On March 28th during an informational session with OFM, staff Mike Mohrman announced that “About 80% of the state’s growth between now and 2050 is expected to be attributed to migration.” (Mike Mohrman, [Growth Management Act and Comp Plan Update \(03-28-23\)](#) > [Clark/Vancouver Television \(cvtv.org\)](#) start at 8:50).
- With an annual average growth rate of 1.4% from now until 2045, Clark County’s population would land at 717,198 residents in 2045. Doing the math, 717,198 minus 698,416 (OFM preferred middle number) represents a difference of 18,782 additional residents for the 20-year planning period or an additional 939 residents per year. The additional 18,782 residents will not be accounted for in the 2025 Comprehensive Plan Update should this Council select OFM’s middle population forecast.

Below, our coalition has provided two data sets that fall between OFM’s middle and high forecast numbers. These two projections of 1.4% and 1.45% predict growth from now, 2022 (520,900 residents) to 2045. We have included the delta between OFM’s middle projection and other scenarios.

Population by 2045	Annual Growth Rate	Difference
698,416 (OFM middle)	1.26%	-
717,178	1.40%	+18,762
725,356	1.45%	+26,940
791,809 (OFM high)	1.51%	+93,393

It is for the above reasons, among many, that NW Partners for a Stronger Community-Comprehensive Plan Update Taskforce urges the Clark County Council to adopt a population forecast and associated annual growth rate between the middle and high forecasts outlined by OFM. As stakeholders in the community, we believe adopting a more realistic forecast will benefit Clark County and sets the table for more accurate planning as the Council moves through other elements of the 2025 Comprehensive Plan Update.

The NW Partners for a Stronger Community- Comprehensive Plan Update Taskforce is available for collaboration and to be a resource to the Council and Clark County staff. We look forward to working with the Council in the coming months to ensure an optimal outcome to the 2025 Comprehensive Plan Update.

Sincerely,



Stephen Horenstein
Shareholder
Schwabe



Justin Wood
Government Affairs Director
Clark County Association of
Realtors



Noelle Lovern
Government Affairs Director
Building Industry Association
of Clark County