



February 11th, 2022

Dear Mr. Alvarez & Clark County Council,

The goal of this letter is to address the City of Vancouver's contention with the results of the Buildable Lands Report. Our organization, The Responsible Planning Coalition, advocated for modifications, after much work and depth of research to the previously approved BLPAC recommendations. Our coalition found the researched and presented modifications more accurately accounted for factors such as increased stormwater facilities based on soil type, a market factor for parcels that will not convert during the 20-year cycle, and deductions for public facilities like parks and schools. Resolution 2021-06-20 was adopted by the Clark County Council in fairness and transparency. Any assertion that our coalition had unique influence over the democratic process of the council is inaccurate.

VBLM Recommendations:

Both private and public entities in Clark County want a viable, safe, and equitable community. Construction and business professionals alike know that we have a vastly shrinking land supply that is inextricably linked to increased housing costs. The Responsible Planning Coalition believes that we do not have 1,492 acres of surplus land supply for the next 20-year cycle. Despite disagreement with the City of Vancouver on land supply, our two organizations can agree that the population forecasts the County is using during this process are wholly inaccurate. In Clark County, OFM recorded a 2.72% increase in population from 2020-2021. Our coalition believes an update to our population forecast is an imperative task for the upcoming comprehensive plan update. Where our two organizations disagree is how we are going to house our growing population.

Our Vacant Buildable Land Model Recommendations included an infrastructure set-aside of 34%, which is an increase of 3% over the BLPAC recommendations. This small change makes a huge impact given the increased requirements for stormwater facilities, greater street and sidewalk requirements, water, sewer, electrical, and open space requirements, of which all are considered infrastructure and our modification most accurately represents what professionals are seeing in the field, based on current assessments. Environmental regulation has increased over the last 20 years, and will increase in the future, making retrospective analysis less accurate.

Our market factor of 20% vacant and 40% underutilized gives a better picture of actual land use trends throughout the county. This displays what truly does not convert over the 20-year cycle. Assuming underutilized parcels will convert at a greater rate is not presented in the data. Research shows these underutilized parcels currently house businesses, and assuming these will convert at a greater rate than what reality shows would artificially constrain land supply in Clark County. Previous versions of ground proofing disclosed systematic errors in the mapping, particularly in underutilized lands. Many commercial and industrial users do not have a lot of building value, but utilize most of their site, causing it to be mapped vacant or underutilized. Ultrablock and asphalt plants were previous examples. Vacant

parcels may never convert due to convenience, critical areas, topography, etc. Our BLPAC modifications more accurately reflect land use trends in Clark County. As suggested by the City of Vancouver we would like to participate in ground truthing these particular vacant and underutilized parcels, the private and public sector should have equal representation if this ground truthing takes place.

In addition, our coalition pushed for capital facilities infrastructure deductions for schools and parks, at 7.9% for schools and 12.8% for parks. These figures are backed by school officials and the most current capital facilities plan for each jurisdiction in Clark County. It was imperative that these deductions were introduced given the fact that school districts and parks departments can buy any parcel regardless of zoning designation. Also, in the past, parcels have been bought for schools and park use only to be sold years later, further creating instability in planning and land use throughout Clark County. The need for these capital facilities recommendations is clearly outlined in the Clark County Comprehensive Plan 2015-2035, **“To what extent have capital facilities, critical areas and rural development affected the supply of land suitable for development over the comprehensive plan’s 20-year timeframe?” (Clark County Comprehensive Plan pg. 50)**. The BLPAC did not include any deductions for capital facilities, it only recommended staff look at each capital facilities plan. Moreover, the City of Vancouver admits that school and park facilities may be located on non-residential land, further taking away employment lands in a city that increasingly allows conversion of commercial land into residential. The Council should be concerned that the City of Vancouver is increasing its residential land through dependence on commercial conversion to residential. The Clark County Comprehensive plan asserts that employment opportunities should be close to housing. **“Link housing strategies with the locations of work sites and jobs.” (Clark County Comprehensive Plan pg. 82)** Future Vancouver residents may have to commute farther and farther away because swaths of commercial land are being converted into exclusively residential or mixed use, this strategy by the city is unsustainable. Based on this knowledge, these deductions are more than justified.

Specifically in Vancouver, the recommendation, “Assume mixed use split for residential development on commercial land in the Vancouver City Center of 30% and 15% for Vancouver commercial land outside the City Center” was denied by Resolution 2021-06-20. One of the chief goals of Clark County’s comprehensive plan is to plan for large employment centers close to housing. The Clark County 2015-2035 comprehensive plan actively discourages the conversion of employment lands in residential: **“Conversion of industrial or employment lands to non-industrial or non-employment districts may occur within the following parameters:**

- a. **Protect and preserve lands zoned heavy industrial for heavy industrial uses.**
- b. **Protect employment lands from conversion to residential.” (Clark County Comprehensive Plan pg. 238)**

Our coalition raises concern that this goal will not be achieved in the City of Vancouver. The amount of mixed-use development and outright re-zoning of commercial land is worrisome. City staff raised concerns about expanding low density housing and urban sprawl, but there was no mention of employment lands and the land supply needed to accommodate the largest city in Clark County. Vancouver needs more medium and low-density land to comply with the County’s comprehensive plan goal of, **“No more than 75 percent of the new housing stock would be of a single product type (e.g., single family detached residential or attached multi-family)” (Clark County Comprehensive Plan pg. 53)**. The City of Vancouver did not achieve this goal and currently 76% of all housing units in Vancouver

are multifamily. Restricting land supply will only exacerbate the increase in multifamily housing and conversion of commercial land to do so.

Moreover, given the condominium defect liability laws in this state it is expensive and difficult to build an ownership model multifamily development. Therefore, detached and attached middle housing options and single-family homes are the only viable solution to ensure lower cost housing that offer an opportunity for home ownership. Home ownership is the best way to create generational wealth across all demographics. We would petition the City of Vancouver to modify its position on the Buildable Lands Report to better satisfy the City's goals of equity and climate change: offer more ownership model housing and ensure large employment centers close to housing. All jurisdictions in Clark County are meeting their density goals. **"All cities and the Vancouver (U) met their residential density targets (Figure 9). At 18.3 housing units per acre, residential development was densest in Vancouver." (BLR pg. 6)** The concerns of urban sprawl from the city are overblown, and it shows land development has been responsible and will continue to be responsible with any additional land added to supply.

Buildable Lands Report:

Our coalition disagrees with the final assertion from Community Planning that we have 1,492 surplus acres of buildable land for the next 20-year cycle. This is not what industry professionals are seeing on the ground. We believe that assumed future density, improper buildable parcel classifications, inaccurate population forecasts, and a severe lack of ground truthing by each jurisdiction and the County are to blame for the conclusion. The VBLAG was not given a GIS Map of the categories so that the advisory group could go out and ground proof the results. Critical area and increased infrastructure requirements will only increase as policy makers move to make transportation more multimodal and protect our environment. This concern was cited in Clark County's 2015-2035 Comprehensive plan, **"Increasing federal, state and local environmental protection regulations have reduced the amount of land available for development and increased the time and cost involved in producing housing. The goal of protecting sensitive environmental resources may run counter to the goal of producing an adequate supply" (pg.73)**. Our coalition fears these future factors are not being taken into consideration in this report.

Increased housing costs and land supply are inevitably linked. To build the middle housing types both the city and the county want, we need more land supply to make this type available and affordable. This comment was echoed at the builder & developer meeting the City of Vancouver held while discussing their housing code update which focuses on middle housing. A former City Councilor even alluded to banning single-family zoning within the city. Again, this is not what was laid out in the comprehensive plan Clark County adopted, **"Support diversity in the mix of housing types in the community, while improving home ownership tenure" (pg. 85)**. Moreover, the Vancouver Urban Growth Area has more than met this diversity of housing unlike the city proper. **"From 2016-2020 the development trends in the VUGA were 65% SFRs and 35% multifamily" (BLPAC Exhibit 15, pg.94)**. Again, the concerns of urban sprawl are unduly exaggerated.

Community aspiration and thriving businesses can be found in the concept of the property ladder. Given increased housing costs the citizens of Clark County are stuck in their current housing, waiting for cost to come down to move up the ladder. The market wants single-family homes, otherwise this product type wouldn't be built. Renters who could afford a home in the recent past are now stuck renting which increases the price of rentals across the board. This is evident, all housing types are facing very high

demand and low supply. **“The average sales price was \$549,900 in Clark County in December 2021. This represents an 18 percent increase from December 2020 when it was \$467,800” (Q4 Community Development report/RMLS).** Currently, inventory sits at 0.5 months for December 2021, this is a decrease from a month prior (Clark County Association of Realtors). With shrinking inventory of homes, businesses suffer due to employees seeking housing elsewhere, demand for rentals has skyrocketed and multifamily construction has increased as a result. If we can get more homes on the market to increase supply, costs will go down and the citizens of Clark County can move up the property ladder creating more affordable options for those on the lower rungs and normalizing the market overall.

Employment Lands:

The current job to housing unit ratio of 1.19:1 is not in compliance with Clark County’s comprehensive plan, which calls for a job to unit ratio of 1:1. The 2019 employment lands inventory conducted by the Columbia River Economic Development Council shows that in Clark County we have 1,520 net acres of commercial or industrial zoned property 20 acres or greater that can be developed in the next 3-30 months. The fact that the BLR report only shows 1,492 net buildable acres total is a huge indication that we do not have enough net acres to develop and accommodate both the county’s housing and employment needs over the next 20-year cycle. Moreover, increased housing costs drive employers away from Clark County, especially since lifestyle and cost of living choices have been enhanced because of hybrid and remote work options. Housing affordability is important to employers regardless of which sector they operate in.

Where do we go from here?

While our two entities may disagree on land use policy, we can agree that the population forecasts for Clark County are severely underestimated. We hope to join the City of Vancouver in advocating for updated population forecasts and ground truthing efforts. Our coalition realizes the need for more land, and planning requires studying both current and future trends.

In large part, the American Dream is based on social mobility and private property. Asserting density assumptions based on vertical development will drastically increase the cost of ownership model housing both in the City of Vancouver and throughout Clark County. The position the City of Vancouver has taken may diminish social mobility and access to private property. The Responsible Planning Coalition will continue to advocate for adequate land use planning so future generations in Clark County can own a home and live close to where they work. The current report would limit those opportunities, it has and will be our mission to voice what development, business, and construction professionals are seeing on the ground and ensure access to the American Dream for future generations.

Signed,

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