

From: [Carol Levanen](#)
To: [Jose Alvarez](#)
Subject: [Contains External Hyperlinks] Fw: Vacant Buildable Lands Model - FOR THE PUBLIC RECORD
Date: Monday, December 9, 2019 9:15:01 PM

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Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604 E-Mail
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----- Forwarded Message -----

From: Carol Levanen <cccuinc@yahoo.com>
To: Eileen Quiring <eileen.quiring@clark.wa.gov>; Shawn Hennessee <shawn.henessee@clark.wa.gov>; Gary Medvighy <gary.medvighy@clark.wa.gov>; Julie Olson <julie.olson2@clark.wa.gov>; John Blom <john.blom@clark.wa.gov>; Temple Lentz <temple.lentz@clark.wa.gov>; mitch.nickolds@clark.wa.gov <mitch.nickolds@clark.wa.gov>
Sent: Monday, December 9, 2019, 09:09:35 PM PST
Subject: Fw: Vacant Buildable Lands Model

Dear Councilors,

Thank you for your continuing work on the county's comprehensive growth plan and the vacant buildable lands report. With regard to your upcoming May 29 meeting:

The staff needs a strong guiding policy from you to direct the methodology for an effective and true buildable lands model. That should include an insistence on using specific data to ensure the citizens have an abundant, usable, and affordable land supply that will be available for housing and jobs. That should include a variety of densities and housing types, urban and rural elements.

Remainder Parcels

The issue of how remainder lots from cluster developments are treated should have been addressed. There are many throughout the county and GIS should acknowledge them in a specific layer. How likely are they to be developed within the next 20 years? Are they counted at *urban densities, rural, or both?* In failing to appropriately account for these parcels, the numbers for jobs and housing will not be accurate and could easily be inflated. (Please review the *2016 Planning Assumptions* prepared by *R.W. Thorpe* for Clark County, Assumption 1. *2018 Buildable Lands Guidelines*, Dept. of Commerce, Appendix B: Reasonable Measures, Pg. 64).

Infrastructure, Easements, Parks

Please ensure ample estimates for the public infrastructure needs, and the impacts of many parks, open space, Legacy Lands, conservation easements, trail systems, storm water drainage systems, pipelines, and large parcels reserved for schools and recreation. These areas have been woefully underestimated in past reports and

results in inflated numbers.

Steep Slopes, Critical Lands, Associated Buffers, Illegal Parcels

Because these areas will not develop to potential density, how are they treated? Some may say figuring in buffers for critical areas doesn't matter because little change results. In the real world, that doesn't translate for landowners. In light of the many landowners that have come to CCCU with permitting issues concerning critical areas and buffers, it seems prudent to accurately account for critical areas and all buffers in this report. If property owners can't ignore buffers when standing at the permit counter to build a new home or make an addition to an existing one; why would Clark County not accurately reflect them in the buildable lands report? It would be interesting to see a map and compare all critical areas and associated buffers across all land use zones. You surely would not want to create a policy that burdens rural landowners unfairly.

Expensive and Difficult to Build

Much of the remaining land is impacted by streams and critical area concerns that make building on these parcels expensive and difficult. These areas will most likely not address the needs of low or middle income home buyers. How likely are they to develop within the next 20 years? At what density?

Infill and Redevelopment

It is not reasonable for Clark County to rely on infill to resolve our problems for affordable housing and jobs. Increased density in our neighborhoods is being met with resistance as it disrupts the character of existing neighborhoods. Is increased density the way citizens want to meet growth expectations? Perhaps it's time the planners have real conversations with the neighborhoods so the citizens are able to fully comprehend how land use zoning and increased density affects them.

Market Trends and Affordable Housing

Ask the Realtors about current trends and market conditions. They will tell you there isn't enough affordable homes to satisfy low and medium market demand and that potential buyers are driven further north to find homes and land they *prefer* at prices they can *afford*.

Rural Character

The Growth Management Act states rural character is foremost a description of how local people view their neighborhoods. Horses and small farms have traditionally had places near houses and exemplifies the county's unique blend of rural and residential interests. What is being done to accommodate the growth for the rural element and the robust equine community? The county has a duty to recognize rural lifestyles and how they will be enhanced, verses deterred, over the next 20 years. Ask for reports of permitted houses in the rural, unincorporated, and resource zones over the past 5 years. Is it keeping up with the demand? The scarcity of buildable rural land that is compliant to the zone size needs to be met square on and openly discussed. 80-92% parcel non compliance to the zone size is not a true reflection of the county's

unique rural character and acts as a deterrent. If rural status quo is allowed to go unabated, rural communities and culture will suffer. Is this a policy that you want advanced?

In short, the county needs a policy from you to direct planners towards an effective buildable lands methodology that produces a true model. Please consider the letter to Rep. Pike from Jerry Olson, PLS, PE (Olson Engineering, Inc.), for further review.

Best Regards,

Susan Rasmussen, President, on behalf of the membership.

Clark County Citizens United, Inc.
<http://P.O.Box> 2188
Battle Ground, Washington 98604

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CLARK COUNTY, WA. // HOW MAY PEOPLE ARE WE GOING TO PLAN FOR?

THE 20 YEAR PLAN ONLY CARRIES US 7.1 YEARS USING UPDATED PROJECTIONS

	2016 CLARK COUNTY PLAN	ESTIMATED PROJECTIONS
20 year population growth	145,500	2% = 227,756
Number of Jobs	75,844	55,928
Infrastructure needs (% of acres)	Streets	- 36.3%
	Parks	- 12.8%
	Schools	- 7.3%
	Other	- 0.5%
	Total	27.7% 56.1%
Developable Critical Lands Assumptions	Residential	50% 20-30%
	Commercial	80% 50%
	Industrial	50% 30%
	Port	50% 70%
"Will not convert in 20 years"	Residential	10-30% 15-35%
	Commercial	0% 10-30%
	Industrial	0% 10-30%

YEAR	¹ POPULATION	PERCENT CHANGE
2000	345,238	-
2001	360,760	4%
2002	370,236	3%
2003	379,577	3%
2004	392,403	3%
2005	400,722	2%
2006	412,938	3%
2007	418,070	1%
2008	424,733	2%
2009	432,002	2%
2010	425,363	-2%
2011	433,418	2%
2012	437,226	1%
2013	442,843	1%
2014	450,441	2%
2015	459,495	2%
Average year-over-year growth		2.1%

¹ U.S. Census Bureau



Summary

Population

20 year urban population growth at 2%	204,980
2016 urban Comp Plan population growth	134,040
2016 urbanComp Plan with tested assumptions	72,841
Life of 2016 urban Comp Plan with tested assumptions	7.1 years

Residential Infrastructure

2016 New Comp Plan residential infrastructure assumption	27.7%
Realistic Assumptions	56.9%
Onsite infrastructure	36.3%
Parks Plan	12.8%
Schools Plan	7.3%
Other	>1%
Total	56.9%

Developable Critical Lands Assumptions

	2016 Plan	New Reality
Residential	50%	20-30%
Commercial	80%	50%
Industrial	50%	30%
Port	50%	70%

"Will not convert in 20 years" Assumptions

	2016 Plan	New Reality
Residential	10-30%	15-30%
Commercial	0%	10-30%
Industrial	0%	10-30%

Jobs

	2016 Plan	New Reality
New Urban Households	49,684	85,622
New Urban Jobs	75,844	55,928

Redevelopment jobs (+/- 17,000)

Public sector jobs (+/- 7,700)



Population Projection

459,495 Populations at the end of 2015 (Columbian, 2016)

2015 had 2.0% population growth

Assume 2% population growth for 2016

468,685 Population after 2% growth in 2016 (this would be the starting point for the new plan)

20 years of population growth

2% growth = 227,756 new residents; 696,441 total population

1.8% growth = 200,948 new; 669,663 total population

1.5% growth = 162,565 new; 631,251 total population

1.3% growth = 135,348 new; 604,033 total population

Census

2010 Household size = 2.69 persons per household. 2.576 for all housing units

5.1% vacant housing units

Start the plan with 6/15/16 as updated

Vancouver all residential units = 2.39 per household

Battle Ground all residential units = 2.90 per household

Camas all residential units = 2.65 per household

Jerry's note to himself, re conversation with Bob Poole on Population Projections

The only population projection the county used in the 2016 Comp plan was 1.12%.

This resulted in a population growth for the 20 year period of 2015-35 of 115,000 people, including 11,500 rural residents at a 90-10 split.

When they began analyzing the growth boundaries, this growth did not fill up the existing boundaries.

They did not reduce the growth boundaries, but they held them fixed and calculated a capacity based on the existing growth boundaries, which was about 135,000 people. Add to this the 11,500 rural growth and the total is about 146,500 for the 20 year period.

This is a growth rate of about 1.4%. A growth rate of 2% would generate 205,000 people in 20 years.

Residential Infrastructure Includes:

Onsite	36.3%
New Streets, public and private	
Street widening	?
On site storm ponds	?
On site open space	?
On site recreational areas	?
Offsite	
New arterials	?
Widened arterials	?
New freeways	?
Widened freeways	?
Parks per Parks Plan	12.8%
Neighborhood Parks	
Community Parks	
Regional Parks	
Schools per Schools Plan	7.3%
Elementary Schools	
Middle Schools	
High Schools	
Sports field complexes	?
Churches	0.5%
Police stations	?
Fire Stations	?
PUD substations	?
Powerlines	?
EMS stations	?
Daycare facilities	?
Temporary Subtotal	<u>20.6%</u>
Temporary Total	56.9%



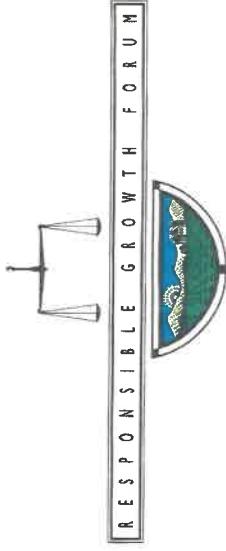
RESPONSIBLE GROWTH FORUM



BUILDING INDUSTRY ASSOCIATION
OF CLARK COUNTY

RESIDENTIAL INFRASTRUCTURE EXAMPLES

Name	Jurisdiction	Gross AC	Streets	Storm	Other	Infrastructure acres	Net acres	Units	Intensity	Intra-structure	Comments
Whipple Creek Village	Clark	7.33	1.81	0.68		2.49	4.84	48	9.9	34.0%	2007 Plat town-houses
North Hills	Camas	9.98	4.07	0.34	0.1	4.41	5.57	44	7.9	44.2%	SF
Belz Place, Phase 1	Camas	14.25	3.74	1.3	0.33	5.37	8.88	48	5.4	37.7%	SF
Kates Cove	Camas	6.59	2.67	0.48		3.15	3.44	29	8.4	47.8%	SF
Winston Estates	Clark	5.45	0.89	0	0	0.89	4.56	24	5.3	16.3%	SF, no storm
Cascade Woods	Clark	2.07	0.11	0.42	0	0.53	1.54	28	18.2	25.6%	attached, existing streets
Birrel Estates	Clark	0.93	0.22	0	0	0.22	0.71	14	19.7	23.7%	attached, no storm, pvt streets
Generation place	Clark	4.85	1.19	0.37	0	1.56	3.29	56	17.0	32.2%	attached
Hills at Round Lake Ph1	Camas	4.64	1.33	0	0.52	1.85	2.79	19	6.8	39.9%	SF
Hills at Round Lake Ph2	Camas	5.51	2.41		0.41	2.82	2.69	24	8.9	51.2%	SF
Hills at round Lake Ph3	Camas	3.94	1.07			1.07	3.94	17	4.3	27.2%	SF
Hills at round Lake Ph4	Camas	13.88	2.03	7.31		9.34	4.54	30	6.6	67.3%	SF, Storm area serves other phases
Hills at Round Lake Ph5	Camas	3.56	1.4			1.4	2.16	25	11.6	39.3%	SF
Hills at Round Lake Ph6	Camas	5.86	2.51		0.11	2.62	3.24	38	11.7	44.7%	SF



BUILDING INDUSTRY ASSOCIATION
OF CLARK COUNTY

RESIDENTIAL INFRASTRUCTURE EXAMPLES (continued)

Name	Jurisdiction	Gross AC	Streets	Storm	Other	Infrastructure acres	Net acres	Units	Intensity	Comments
Hills at Round Lake Ph7	Camas	3.2	0.8	0.33	1.13	2.07	24	11.6	35.3%	SF
Winsdust Meadows Ph1	Camas	18.58	5	2.36	7.36	10.91	83	7.6	39.6%	SF
Windust Meadows Ph2	Camas	19.87	5.57		5.57	14.33	96	6.7	28.0%	SF
1555 - Cougar Creek	Clark County	5.26	1.66	0.22	1.88	3.38	57	16.9	35.7%	SF
1409 - Cooldge Meadows	Clark County	5.23	1.45	0.56	2.01	3.22	58	18.0	38.4%	SF
1316 - Gaiser Estates	Clark County	4.76	1.29	0.2	1.49	3.27	59	18.0	31.3%	Additional storm in private roads
1202 - Ashley Ridge	Clark County	42.49	7.03	4.06	11.09	31.4	60	1.9	26.1%	Additional storm in private roads
Totals		188.23	48.25	18.3	1.8	68.25	120.77	881	7.3	
							weighted average of infrastructure		36.3%	



Parks Vancouver

Vancouver & Clark County Parks Plan requires 7.5 Ac Urban Parks per 1,000 population

Vancouver code requires 6 Ac Urban Parks per 1,000 population = 5 parks and 1 open space

For the Current Plan of 135,348 population growth, this would calculate to 1015 Acres of urban parks at the 7.5 ac standard

For the Current Plan of 135,348 population growth, this would calculate to 812 Acres of urban parks at the 7.5 ac standard

Using the 6 ac Standard

1000 pop/2.66 pop per hh = 6 ac per 376 HH = .016 ac per HH * 8hh per ac = 0.128 ac parks per 1.0 ac

This equates to 12.8% of Vacant Buildable Land for parks

Parks Camas

Camas has planned 5 ac Neighborhood Parks and Community Parks per 1000 population

Camas also has planned in addition 30 acres of Open Space per 1000 population.



Schools Population Projection

Battle Ground Schools data (old comp plan*)

0.373 students K-6 per household = 0.053 student/grade/household

0.083 students 7-8 per household = 0.044 student/grade/household

0.130 students 9-12 per household = 0.0325 student/grade/household

Camas data (old comp plan*)

0.256 students K-5 per household = 0.043 student/grade/household

0.129 students 6-8 per household = 0.043 student/grade/household

0.165 students 9-12 per household = 0.041 student/grade/household

New School Needs (for existing CompPlan) (use Camas data)

Existing 20 year plan = 50281 Household

K-5 = $50281 * 0.048 \times 6 = 14481$ new students

6-8 = $50281 * 0.043 \times 3 = 6486$ new students

9-12 = $50281 * 0.037 \times 4 = 7441$ new students

K-5 = 14481 students @ 600/school = 24.1 schools @ 10= 241 Ac

6-8 = 6486 students @ 1000/school = 6 schools @ 20 = 130 Ac

9-12 = 7441 students @ 2000/school = 8 schools @ 40 = 149 Ac

Total 29,353 students 520 Ac

Each HH requires 0.0135 Ac.,- each net Acre needs 0.062 to 0.083 Acres, depending on density.

Schools = 6.2% to 8.3% of net developable land

* ESD 112 and Evergreen School District verified that these are still valid numbers to use.



Will Not Convert

This does not mean never to convert; it just means that this parcel will not develop in the 20 year time frame.

Examples:

- Property erroneously categorized by GIS, and may be already converted.
- Property that will be converted to a preservation status, such as historic, conservancy, or land trust.
- Industrial property that is 100% used now, but has a low real property value per acre, such as batch plants.
- Polluted property too expensive to clean up.
- Property in a low intensity use that the property owners want to keep, such as Steakburger prior to redevelopment.
- Commercial outside sales areas.
- *Long haul trucking parking lots.
- *Golf driving ranges
- *Landfill sites, not identified as such.
- Urban homes on large lots, kept in the family, or used as a residence for a long time.
- Development costs that preclude development, such as frontage improvements, drainage issues, or expensive sewer extensions
- Mobile homes on lots, not excluded.
- *Parking lots not taxed with the adjacent use, but used as such.
- Parcel may be large enough, but geometry prevents further division.
- *Section 30
- Owner's expectations are more than the market will pay.
- Current owner plans to reside on property until he retires, and then sell.

Recommendations:

15%-- Res vacant will not convert

35%-- Res underutilized will not convert

15%-- Com and Ind vacant will not convert

30%--Com and Ind underutilized will not convert

**Shown as vacant because there are no current structures.*

February 2016 BOCC Preferred Alt Summary Totals 2016

RESIDENTIAL	Gross Acres	critical exclusion	critical exclusion acres	will not convert	will not convert acres	will not convert	will not convert acres	infrastructure %	Infrastr Acres	Developable Net Acres	Housing density	Housing Units	Persons per HH	Persons	double check with county
Battle Ground															
City	1,797.3		445.8		217.6	663.5		217.6	831.7	4,989.9		13,273.2		12546	
UGA	740.0		158.5		131.8	290.3		122.6	327.0	1,961.9		5,297.9		5293	
New	13.1		1.8		0.0	1.8		2.8	8.5		50.8		135.3		121
Total	2,550.3		606.1		349.5	955.6		343.1	1,167.1		7,002.6		18,571.0		
Camas															
City	1,517.4		358.7		202.7	561.5		264.8	691.2		4,147.0		11,036.9		11031
UGA	383.9		55.3		85.7	141.1		67.3	175.5		1,053.2		2,801.5		2801
New	0.0														0
Total	1,901.3		414.1		288.5	702.5		332.1	866.7		5,200.2		13,833.4		
La Center															
City	570.6		124.7		104.7	229.4		94.0	247.1		988.5		2,629.3		2645
UGA	314.2		91.2		54.6	145.8		46.7	121.8		487.1		1,295.6		1295
New	0.0														0
Total						373.2		141.2	121.8		487.1		3,924.9		
Ridgefield															
City	1,535.4		421.0		222.3	643.2		247.1	645.0		3,670.3		10,294.9		10294
UGA	921.2		226.2		153.5	379.7		150.0	391.4		2,548.7		6,247.4		6247
New	102.7		20.9		9.6	30.5		20.0	52.1		312.9		833.3		832
Total	2,559.2		668.1		385.4	1,053.5		417.1	1,088.6		6,531.8		16,542.3		
Vancouver															
City	1,178.7		263.7		151.3	415.0		210.8	552.9		4,423.2		11,765.7		11814
UGA	6,498.8		1,395.6		1,044.7	2,440.4		1,118.8	2,939.7		23,517.3		62,555.9		62909
New	0.0														0
Total	7,677.5		1,659.3		1,196.1	2,855.4		1,329.6	3,492.6		27,940.4		74,322.6		
Washougal															
City	659.1		166.8		83.9	250.7		112.4	296.1		1,776.7		4,725.0		4765
UGA	403.9		94.3		72.5	166.8		65.7	171.4		1,028.4		2,735.6		2735
New	0.0														0
Total	1,063.1		261.1		156.4	417.5		178.0	467.5		2,805.1		7,461.6		
Yacolt															
City	65.6		9.1		5.6	14.8		14.1	36.7		147.0		390.9		390
UGA	16.4		2.1		4.3	6.4		2.8	7.3		29.1		77.3		77
New	0.0														0
Total	82.0		11.2		9.9	21.1		16.9	44.0		176.0		468.3		
Woodland															
City	5.8		2.0		1.1	3.1		0.8	2.0		8.0		21.2		21
UGA	88.9		43.0		13.8	56.8		8.9	23.3		93.0		247.4		247
New	0.0														0
Total	94.8		45.0		14.8	59.9		9.7	25.2		101.0		268.5		
RESIDENTIAL T															
	15,928.1		3,664.9		2,400.6	6,438.7		2,767.6	7,273.5		50,244.2		135,390.6		135121.

Assumptions

Infrastructure		
Residential deduction	27.70%	
Residential deduction Camas	27.70%	
Residential deduction Ridgefield	27.70%	
Commercial deduction	25.00%	
Industrial deduction	25.00%	
Industrial deduction port	25.00%	
Mixed Use deduction residential	25.00%	27.7
Mixed Use deduction commercial	25.00%	27.7
Mixed Use deduction employment	25.00%	
Never to convert		
Vacant residential deduction	10.00%	
Underutilized residential deduction	30.00%	
Commercial deduction vacant	0.00%	
Commercial deduction underutilized	0.00%	
Industrial deduction vacant	0.00%	
Industrial deduction underutilized	0.00%	
Industrial deduction port	0.00%	
Mixed Use deduction residential	10.00%	
Mixed Use deduction commercial	0.00%	
Mixed Use deduction employment	0.00%	
Critical		
Residential deduction vacant	50.00%	
Residential deduction underutilized	50.00%	
Commercial deduction vacant	20.00%	
Commercial deduction underutilized	20.00%	
Mixed Use deduction residential vac	20.00%	50
Mixed Use deduction residential UU	20.00%	50
Mixed Use deduction comercial vac	20.00%	
Mixed Use deduction comercial UU	20.00%	
Industrial deduction vacant	50.00%	
Industrial deduction underutilized	50.00%	
Port deduction	50.00%	
Battle Ground MU-R		
Battle Ground MU-E		
Density		
BG res	6	
Camas res	6	

La Center res	4
Ridgefield res	6
Vancouver res	8
Washougal res	6
Woodland res	4
Yacolt res	4

Jobs

Commercial jobs per acre	20
Industrial jobs per acre	9
Port jobs per acre	9

Mixed Use

Res MU (res 60 - com 40)	60.00%
BG Res MU (res 80 - com 20)	80.00%
Employment res MU (res 25 - com 75)	25.00%

Housing

People per res unit	2.66
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Population

Population projection	1.1%
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The VBLM Spreadsheet

- 1) This is the County Data as of the end of the process in 2016. We gave a copy to Bob Pool, and outside of a few inconsistencies around mixed use, he liked it. Actually, they incorporated my style into their spreadsheet.
- 2) There are two copies of the database on the thumb drive, and they are the same. One is named Master, and should not be edited. The other is called “Play around with”. If you want other versions of “Play around with”, simply do a “save as” with the Master for another copy.
- 3) There are many sheets in the spreadsheet, but only two are directly important. The one called “Summary” is a summary of all the calculations by type and city. There is a number for total population accommodated by this calculation, depending on what the assumptions are. The same exists for jobs by Commercial and Industrial.
- 4) This spreadsheet does not account for any redevelopment, except on underutilized commercial and industrial.
- 5) The Sheet called “Assumptions” lists all of the assumptions in play. By changing any of the numbers on this sheet, the calculations are changed throughout the spreadsheet. As an example, the plan will accommodate about 134,000 new residents, and by changing any of the residential assumptions, such as “development on critical lands”, that number will change, as will the numbers for the affected cities.
- 6) There are three Sheets for each city, one inside the city limits, one outside the city limits in the UGA, and one for the proposed new land for the UGA. The new land is already in the number for the UGA.



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Dear Rep. Pike,

I am sorry I cannot make your hearing tomorrow on GMA, but I hope these few comments will be acknowledged.

I am the owner of an Engineering Company in Vancouver, and have been since 1968, long enough to have participated in the application of the first Urban Growth Boundary in Clark County in the early 1970's. It was accepted by the building community at that time because it was large enough to prevent price pressure on housing prices caused by a reduced supply.

I directed the Government Affairs of the Clark County Homebuilders from 1976-2006, served on their Board of Directors for all of that time, and have been on the Board of the Responsible Growth Forum since 1989. The Comp Plans of 1980, 1994, 2004, 2007, and 2016 have been reviewed during in that period, and I have offered extensive input into all of them.

Busse Nuttley was my staff at CCHBA when she was elected to the House, and we had frequent phone conversations during the adoption of GMA. One of our mutual concerns was that Urban Boundaries not become iron curtains, and that a true 20 year supply be offered inside.

Once implementation reached to the local level, text book planners have managed to shrink that 20 year supply down to much less than a ten year supply, and it is getting worse. With even this mild recovery we are experiencing, lot prices and home prices in Clark County have soared.

This reduction in the supply is mostly accomplished by how you define the 20 year supply, and by the assumptions you use.

Population Projection:

The new plan is anticipating using 1.1% as the projected growth rate, and never, except in the very depths of this last recession for a limited time, has Clark County grown at that snail's pace. The growth rate is already over 2%, and has never been under 2% for any lengthy period in my 50 years in Clark County.

Infrastructure:

Planners have always underestimated the public infrastructure needed, and the effects of generous park plans, extensive storm drainage, and large tracts for schools.

Critical Land Conversion:

The new plan, as well as the previous ones, carries the ridiculous assumption that over half of the thousands of acres of critical land in the Urban Boundaries will develop to full density. Not only that, but with each new plan, those undeveloped critical lands are still there, and the percentage of critical lands in the vacant buildable lands inventory increases.

Jobs per Acre:

The overuse of the Business Park Zone to gain the advantage of a designated 20 jobs per acre has been opposed by the business community. The majority of the high paying jobs want to go to an industrial zone. The Port of Vancouver estimates 3-4 jobs per acre on its Gateway development, when the report uses 9 jobs per acre.

Mixed Use:

No one wants Mixed Use. It is a Smart-Growth Planning dream that people want to live over a Safeway Store on the outskirts of Battleground, and those tracts designated Mixed Use go undeveloped.

Please see the attached Planning Assumptions from the Comp Plan, with my superimposed comments.

Thank you for considering my testimony on GMA.

Jerry Olson, PLS, PE
Olson Engineering, Inc.
222 East Evergreen Blvd
Vancouver, WA 98660
wcrolsons@tds.net
jolson@olsonengr.com\3606951385

From: [Carol Levanen](#)
To: [Eileen Quiring](#); [Shawn Hennesee](#); [Gary Medvigy](#); [John Blom](#); [Julie Olson](#); [Temple Lentz](#); [Mitch Nickolds](#); [Jose Alvarez](#)
Subject: [Contains External Hyperlinks] Fw: Critical VBLM Issues and Concerns - FOR THE PUBLIC RECORD
Date: Tuesday, December 10, 2019 5:16:49 PM

CAUTION: 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,

It appears Econorthwest is taking on the role of policy making, which is the exclusive role of the Clark County Council. As highly trained professionals, they are to assure the Council is given true information based on accurate facts. It was disturbing to hear the facilitator mention more than once that rural was not going to be considered. We hope rural interests are not being intentionally disadvantaged in this process as that would be against the law. Clark County Citizens United, Inc. and its membership trusts members of the Buildable Lands Committee and the Councilors will make good decisions based on unbiased and complete data and analysis according to the Growth Management Act. To assure this happens, the following questions need to be answered.

RCW 36.70A.215

Review and evaluation program. (Effective January 1, 2030.)

(1) Subject to the limitations in subsection (7) of this section, a county shall adopt, in consultation with its cities, **countywide** planning policies to establish a review and evaluation program. This program shall be in addition to the requirements of RCW [36.70A.110](#), [36.70A.130](#), and [36.70A.210](#).

1. In order to create their draft, did EcoNorthwest confer with other jurisdictions on how they are compliant to the new law?

RCW 36.70A.215 "Review & Evaluation Program - The county and its cities shall consider information from other appropriate jurisdictions and sources."

2. Who decided to use an exclusive policy and limit the project to urban only?

RCW 36.36.70A.215 (2) (a) - "Review and Evaluation Programs Shall: Encompass land uses and activities both within and outside of Urban Growth Areas and provide for annual collection of data on . . . rural land uses, development, zoning and development standards, environmental regulations, including but not limited to critical areas, stormwater, shorelines, and tree retention requirement and capital facilities to determine the quantity and type of land suitable for development, both for residential and employment based activities. "

The robust equine community and economy is an integral part that encompasses land use activities within and outside of urban growth areas. This community helps to

define the unique rural character and culture of the region.

3. Is Econorthwest looking at similar Washington state regional zoning areas and impacts on buildable lands programs?

RCW 36.70A.215 (1) "*In developing and implementing the review and evaluation program required under this section, the county and its cities shall consider information from other appropriate jurisdictions and sources.*"

4. Did Econorthwest examine rural social and economic impacts in their report, as required in the new law?

RCW 36.70A.215. (3) (e) "*Based on the actual density of development as determined under (b) of this subsection, review commercial, industrial, and housing needs by type and density range . . .*"

5. The new law repeatedly addresses Countywide Planning Policies, countywide population and allocations. How does Econorthwest comply with the directives of the new law regarding these mandates?

RCW 36.70A. 215 (3) (a) "*At a minimum, the evaluation component of the program required by subsection 1 of this section shall determine whether there is sufficient suitable land to accommodate the county-wide population projection established for the county . . . and subsequent population allocations within the county . . . The zone capacity of land alone is not a sufficient standard to deem land suitable for development or redevelopment within the twenty-year planning period.*"

6. How does Econorthwest intend to make use of the Clark County NRCS Soils Manual, and the GIS critical and constrained areas to help determine buildable lands? How are they showing this work?

RCW 36.70A. 215 (b) "*Identify reasonable measures . . . necessary to reduce the difference between growth and development assumptions and targets contained in the **Countywide Planning Policies** . . . with actual development patterns . . . to reconcile inconsistencies*"

7. What data will be used to determine the type of housing people prefer? This references affordable housing according to market demand per the guidelines and the law.?

RCW 36.70A. 215 (a) "*Determine whether a county . . . comparing growth and development assumptions, targets, and objectives . . . with actual growth and development that has occurred in the county .*".

(3) (d) "*Determine the actual density of housing that has been constructed and the actual amount of land developed for commercial and industrial uses . . . since the adoption of a comprehensive plan under this chapter*"

8. Did Econorthwest analyze future housing and employment growth based on past, present and future infrastructure such as SR 502, Chelatchie Prairie Railroad, Interstate 5 improvements, additional interstate bridges, full build-out potential of Cowlitz tribal land and activities, Yacolt and La Center sewer development and expansions, future incorporation, LAMIRD expansions and port developments.?

RCW 36.70A 215 (2) (a) "The Review and Evaluation Program shall: (a) encompass land uses and activities both within and outside of urban growth areas and provide for annual collection of data on urban and rural land uses, development, zoning and development standards, . . . and capital facilities to determine the quantity and type of land suitable for development, both for residential and employment based activities. "

In order to fulfill their duties under RCW36.70A.215, the Clark County Council needs to take seriously, answers to these questions and many other questions that are sure to come up as this process unfolds..

Sincerely,

Susan Rasmussen, President

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

From: [susan rasmussen](#)
To: [Eileen Quiring](#); [Gary Medvigh](#); [Julie - Autoanswer Olson](#); [John Blom](#); [Temple Lentz](#); [Jose Alvarez](#)
Subject: [Contains External Hyperlinks] Limited the Scope of RCW 36.70A.215
Date: Wednesday, January 29, 2020 8:53:56 AM

CAUTION: 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.

FOR THE PUBLIC RECORD OF THE CLARK COUNTY BUILDABLE LANDS PROGRAM

Dear Councilors and Committee Members,

Please understand the scope of work proposed in the **Clark County Review and Evaluation Program, Issue Paper 1 for the Buildable Lands Program**, was made without input from citizens. It was presented to the Councilors during a worksession held May 29, 2019. The public participation plan wasn't adopted until July 6, 2019.

The first meeting of the committee wasn't until Dec. 6, 2019. I can only determine that it was written by professional staff. No one from the building industry, real estate, banking, social services, environmental and property rights were part of discussions in preparing **Issue Paper 1** for your review. This is not a "bottom-up" approach as outlined in the Guidance from Dept. of Commerce.

Secondly, **Issue Paper 1** states:

...*The purpose of the Program per RCW 36.70A.215(1)(a)(b) and (3)(a) is to . . .*

Issue Paper 1 sites only certain parts of the particular RCW concerning urban and eliminates **(2)(a)** entirely. The law here is very specific as it broadens the scope of the law:

(2) The review and evaluation program shall:

(a) Encompass land uses and activities both within and outside of urban growth areas

and provide for annual collection of data on urban and rural land uses, development

zoning and development standards, environmental regulations including but not

limited to critical areas, stormwater, shoreline, . . to determine the quantity and

type of land suitable for development, both for residential and employment-based activities.

Additionally, **Resolution No, 2019-07-06** and **Issue Paper 1** reference the **2018 Washington State Department of Commerce updated Buildable Lands Guidelines** and includes new state requirements as well as those that have been there all along.

Issue Paper 1 fails to mention **Section 3 (f); Section 3 (g):**

The buildable lands guidance shall analyze and provide recommendations on: Evaluating how existing zoning and land use regulations are promoting or hindering attainment of the goal for affordable housing in RCW 36.70A.020 (4). Barriers to meeting this goal shall be identified and considered as possible reasonable measures for each county and City . . .

The buildable lands guidance shall analyze and provide recommendations on: Identifying strategies to increase local government capacity to invest in the infrastructure necessary to accommodate growth and provide opportunities for affordable housing across all economic segments of the community and housing types.

Issue Paper 1 falls short of addressing the entire ***RCW 36. 70A. 215 Review and Evaluation Program, and the 2018 Buildable Lands Guidance***. Properly acknowledging all aspects of the RCW would create an equitable and truly measurable approach that ensures county-wide housing that serves county-wide populations for all current and future residents. County-wide populations, county-wide planning policies and local discretion are woven throughout the 2018 Guidance.

More importantly, if rural lands fail accounting, how will the impacts of displacement of future rural generations be addressed? Understanding and addressing displacement and harm on certain local communities is a critical body of work that must be understood and made part of the county's 20-year plan. Any displacement of a community, either rural or urban, should require accountability so the impacts of displacement may be anticipated and a housing crises may be averted.

The choice of limiting the RCW and the analysis was unfortunate. That action has the potential to influence the policy choices of the Councilors.

Clark County Citizens United promotes a countywide buildable lands analysis. Adopting goals and policies that promote market-affordable housing for all citizens, urban and rural . . . that benefits the entire county. To promote genuine affordability and be able to accommodate all growth as required by law, we need a variety in housing types the citizens want and need.

Thank you,
Susan Rasmussen for
Clark County Citizens United, Inc.

Sent from [Mail](#) for Windows 10

From: [susan rasmussen](#)
To: [Jose Alvarez](#); [Shawn Hennessee](#); [Mitch Nickolds](#); [Eileen Quiring](#); [Gary Medvигy](#); [Temple Lentz](#); [Julie Olson](#); john.blum@clark.wa.gov
Subject: [Contains External Hyperlinks] FW:
Date: Monday, February 17, 2020 1:38:04 PM
Attachments: [A08168BFBBE04B0DAA456D2AE4C9C8A6.png](#)

CAUTION: 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 Jose,

Thank you for including four of my public comments regarding the work of the county's buildable lands program. Because a "bottom-up" approach is preferred, it is important nothing is filtered.

Please include this comment as well, submitted 2/12/2020.

Thank you,
Susan Rasmussen

Sent from [Mail](#) for Windows 10

From: [susan rasmussen](#)
Sent: Wednesday, February 12, 2020 10:23 AM
To: eilene.quiring@clark.wa.gov; [Temple Lentz](#); john.blum@clark.wa.gov; julie.olson2@clark.wa.gov; gary.medvигy@clark.wa.gov; mitch.nickolds@clark.wa.gov; shawn.henessee@clark.wa.gov
Subject: FW:

For the Public Record of the Buildable Lands Program

Concerns over the **2016 Thorpe Report**, Process

Dear Councilors,

Due to the limited scope of the report, the analysis is faulty. What is not contained in the report is another indication of how the scope was confined. Only staff were authorized to speak to the writers. Please note, the **2016 Thorpe Report** was neutrally funded by local taxpayers.

Kindly read the analysis about the **Urban/Rural Population Split**. Pg. 21. This type of assumption is very different from the others. It is not a technical assumption concerned with a methodology such as the correct way to count lots. The urban/rural split is a policy-driven assumption that should be directed by the Councilors. This policy shows where growth likely will occur.

The Report hints at this point on Pg. 22:

WAC: *Growth trends vary throughout the State of Washington and therefore there is no specific State code governing how counties project their growth across a 20 year planning cycle. However, the state code does allow local city and county jurisdictions the autonomy to make planning decisions based on local circumstances.*

The Report further notes;

Whatcom: *According to US Census data, the Whatcom County urban/rural split is 76/24. Whatcom County used the actual population split to calculate the county-wide planning assumptions for the comprehensive plan update. This works for Whatcom County as the growth rate between urban and rural areas is roughly the same at 78/22.*

The report never gets directly to the point that the new assumption, using aspirational values vs. historical, or actual growth values, is entirely at the discretion of the Councilors. Therefore, it is just as valid to use “aspired” projected growth, “actual” percentages, or “historical” splits that are documented in the **Clark County Plan Monitoring Report (1995-1999)**. A thorough analysis would have pointed this out and described the options that could be used to direct policy decisions.

Despite the coming and going of various elected officials, county planning remains unchanged. The county's use of “projected” growth should not be surprising because all staff reports, adopted policies and zoning regulations since 1994, call for virtually no growth opportunities throughout the rural areas. The growth since 1994 has been squarely focused on urban. The report fails to say that.

The Thorpe Report, Findings, Page 21, Urban/Rural Population Split states:

Findings: *The population growth split has historically averaged 89% urban and 11% rural for the past 20 years. The 2004 and 2007 comprehensive plans have used the 90/10 growth projection which is accurate.*

The words, *the 90/10 growth projection which is accurate*, should have been stricken from the report.

The statement demonstrates bias in favor of the “projected” 90/10% growth option. This is concerning because it may influence policy and lead Councilors towards a predetermined conclusion.

A more appropriate, neutral growth analysis should have stated:

Findings: The choices of using historical, existing use, or aspirational growth statistics are all valid as possible assumptions, since this parameter is a policy-driven choice and not an assumption for a technical measurement standard. The historical population growth split remained unchanged between 1995-1999 at 82/18%, (**Clark County Monitoring Report, July 2000**, Pg.11). 86/14% split is accurate with regard to existing growth data, 90/10% may be a projected option.

Lessons learned from the 2016 Thorpe Report:

1. Any policy regarding the population ratio may be correct.
2. The population ratio is a policy-directed decision, not a technical exercise of how to count things.
3. Reports and data may be written and presented in ways that create opportunities that easily influence policy directives.
4. Professional staff and contractors should be cognizant of neutrality. Their work is informative
and should provide accurate, pertinent data that enable the Councilors to make the best decisions for their constituents.

Thank you for your work,
Susan Rasmussen
Clark County Citizens United, Inc.

From: Carol Levanen <cccuinc@yahoo.com>
Sent: Monday, February 10, 2020 10:45:06 PM
To: Eileen Quiring <eileen.quiring@clark.wa.gov>; Shawn Hennessee <shawn.henessee@clark.wa.gov>; Gary Medvigy <gary.medvigy@clark.wa.gov>; John Blom <john.blom@clark.wa.gov>; Julie Olson <julie.olson2@clark.wa.gov>; Temple Lentz <temple.lentz@clark.wa.gov>; Mitch Nickolds <mitch.nickolds@clark.wa.gov>
Subject: Fw: 2016 Thorpe Report

Dear Councilors,

In 2016, a highly respected consulting firm was hired by Clark County to review assumptions for buildable land models. The initial contract read they were to evaluate assumptions A and B. The report only reviewed B, at the direction of staff. CCCU understands that Thorpe could not adequately determine the assumptions because staff did not present them with adequate review documents. Thorpe indicated in a work session that if they had been given additional information, they would have determined the non-valid determinations differently. The following is excerpts of the report followed by an attachment of the document.

Sincerely,

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

.

- . Prepared by R.W. Thorpe & Associates, Inc. January 11, 2016**

- . Assumption Findings - Overview Valid: Assumptions 1 and 2**

Partially Valid: Assumption 5 and 8

Invalid: Assumptions 3, 4, 6, and 7

Assumption 1:

Assumption: These rural VBLM assumptions should be used not to reflect what is possible, but to reasonably plan what is likely. Parcels that cannot reasonably be expected to develop should not be counted as likely to develop. Cluster

development remainder parcels that are known to be prohibited from further development should not be counted as parcels likely to develop. R.W. Thorpe & Associates, Inc.

Finding - VALID: State WACs, RCWs and GMA deem remainder parcels as permanently protected undevelopable areas save for a few exceptions so these areas should not be counted as likely to develop. Effect: The validation of this assumption removes these parcels of land from the rural available inventory for future development.

Assumption 2:

Assumption: Parcels located in areas far from any infrastructure with long term commercial forestry operations likely to continue should not be counted as likely to develop. These assumptions are not used to authorize or to prohibit the development of individual parcels. Rather, these assumptions, should only be used for tallying parcel totals for general planning information

Finding - VALID: Though some development may happen in limited cases, lands that are deemed to have long term commercial forestry operations should not count as likely to develop. Effect: The validation of this assumption removes these parcels of land from the rural available lands inventory for future development beyond what the Resource Districts allow as permitted uses.

As part of the review of these assumptions, consideration was given to **background data and documents provided by Clark County**. These documents, to our knowledge, are not

adopted regulations or policies, but assist in creating the assumptions used in the Rural Vacant Buildable Lands Model.

Research of all documents referenced above concludes that **two of the eight assumptions are valid**, four assumptions are invalid, and **two assumptions are partially valid**. **Assumptions one and two are overall valid**. Assumptions three, four, six, and seven are overall invalid. Assumption three is **invalid as there is not a way to determine on a case by case basis**, which environmentally constrained lots will be able to develop. Thus it is not possible to assume which lots from this group are reasonably probable to develop, or not develop. **Assumptions four, and seven are not valid as these assumptions were previously applied to urban parcels and simply carried over to apply to rural parcels**. Rural and urban parcels develop at different rates and **require additional analysis** to determine appropriate percentage deductions. **Assumption five** was found to be partially invalid since all legal nonconforming lots are developable parcels. A new policy decision would need to be made and implementing regulations put in place to determine which percentage is appropriate to apply to nonconforming lots.

Assumption six is similar to assumption five, however the assumption is found to be invalid as it is **not specified if the assumption refers to legal or illegal non-conforming lots**. If the assumption refers to legal nonconforming lots than it is invalid as

all legal nonconforming lots are eligible for development. If the assumption refers to illegal nonconforming lots, the assumption is invalid because illegal nonconforming lots are prohibited from development unless they are brought into compliance. Finally, assumption eight is determined to be **valid** on its face, however, a **zero percent deduction for rural infrastructure is not reasonably probable** and a percentage lower than 27.7% needs to be calculated based on available data and applied as a deduction to the rural land capacity. The necessary deduction should fall between 0% and 27.7%.

- - . In addition to the eight assumptions consideration was also given to the average household size (persons per household) and **urban/rural population split**. The average household size and population split are two additional exploratory measures used to determine the validity of each assumption. The use of the average household size ratio determines the necessary housing units needed for the projected population growth

over the next 20-year period. In conjunction with the average household size, the urban/rural population split determined the projected **population increase outside of the urban growth areas (UGA)**.

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R.W. Thorpe & Associates, Inc.

From: [Carol Levanen](#)

Sent: Monday, February 10, 2020 10:52 PM

Subject: Fw: 2016 Thorpe Report

Dear Councilors,

In 2016, a highly respected consulting firm was hired by Clark County to review assumptions for buildable land models. The initial contract read they were to evaluate assumptions A and B. The report only reviewed B, at the direction of staff. CCCU understands that Thorpe could not adequately determine the assumptions because staff did not present them with adequate review documents. Thorpe indicated in a work session that if they had been given additional information, they would have determined the non-valid determinations differently. The following is excerpts of the report followed by an attachment of the document.

Sincerely,

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

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. **Prepared by R.W. Thorpe & Associates, Inc. January 11, 2016**

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allow as permitted uses.

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average household size and population split are two additional exploratory measures used to determine the validity of each assumption. The use of the average household size ratio determines the necessary housing units needed for the projected population growth over the next 20-year period. In conjunction with the average household size, the urban/rural population split determined the projected **population increase outside of the urban growth areas** (UGA).

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R.W. Thorpe & Associates, Inc.