



CP16#0485



November 26, 2014

Commissioner Tom Mielke, Chair
Commissioner David Madore
Commissioner Jeanne Stewart

Honorable Commissioners:

With the Clark County Comprehensive Plan Update entering key stages, we ask you to continue to support the decisions and process you and your staff have adopted to keep the GMA update process on track towards a timely and successful conclusion in June 2016.

As your city partners, we fully support the Board's objectives of emphasizing jobs over housing growth in this update, and of keeping cities "whole" by not forcing unrequested reductions or expansions of Urban Growth Areas (UGAs). Currently, the cities of Battle Ground and La Center have requested small, site specific UGA expansions based on employment opportunities. Ridgefield has agreed to the County's request to add the Tri-Mountain Golf Course to its UGA and is currently supporting a small, targeted landowner request for inclusion that would result in very limited increases in net residential land supply. The other cities are focused on growing within existing boundaries for this plan update cycle. We believe the baseline growth forecast and assumption decisions you have made this past year support these objectives, although as acknowledged, minor adjustments may be needed at the end of the process to avoid forcing unwanted UGA changes driven by the math.

We would like to take this opportunity to recommend against two more fundamental changes that have been suggested to these baseline growth decisions. In our view increasing the population forecast to match the past 50-year trend and increasing the residential infrastructure assumption by a factor of approximately 25% would undermine the priority of jobs over housing you have set, and have other negative consequences for the update process and outcome.

From a practical standpoint, small changes can have big impacts. Increasing the population forecast to one based on 1.28% annual growth as suggested would add another 16,000 or more persons to the 20-year total, which in turn would require increasing the employment forecast by 7,000 or more jobs in order to maintain the desired jobs to housing ratio. This is equivalent to adding a second City of Battle Ground to the new growth already planned for. Similarly, raising the residential infrastructure deduction to 32-35% of developable land would increase the total residential land supply needed countywide by approximately 25%, which by itself may trigger the need for significant UGA expansions for housing even without changes to the population forecast. Unlike the site specific UGA expansion proposals from some of the cities, there are no known plans or proposals for accommodating growth of this magnitude or funding needed services. Large UGA expansions may:

- outstrip realistic capital facilities capabilities,
- trigger further use of Urban Holding designations on the new lands,
- necessitate completing a full new Environmental Impact Assessment,
- increase the time and cost we have budgeted for the plan update, and
- subject the County and cities' resulting plans to considerably more legal scrutiny and exposure.

From a technical standpoint, we do not support basing future plans on a simple extension of the past 50 year's growth, as many of the factors influencing past growth won't play the same role in the future. Fifty years ago Clark County was 1/5 its current size, fertility rates were higher, there were wide expanses of large, unconstrained land tracts to accommodate new development, and major new freeways were being built that opened new access to these areas. By contrast the medium OFM forecast you have already adopted for this process is reasonable. It is what the agency projects as most likely to occur, and is already being used in local transportation planning by RTC. Consultation with OFM staff and materials confirms that the forecast is based on long term demographic and economic considerations, and does not assume there will be no economic recovery, only that the precise year isn't known.

We also do not support increasing the residential infrastructure deduction by a factor of approximately 25% without clear supporting data. Stormwater represents only a portion of infrastructure, and poorly drained areas represent only a portion of new growth areas. The proposal to increase the entire infrastructure assumption countywide appears based primarily on hypothetical examples. The current 27.7% infrastructure assumption is based on past County analyses of infrastructure dedications that occurred in actual developments. New state mandates will undoubtedly make stormwater compliance more challenging and costly, but land implications are unclear. An April 2014 Clark County Environmental Services Department analysis, while not taking a formal position, noted that some of the smaller decentralized

stormwater facilities likely to be required under the new mandates could be accommodated in the road right-of-way. The analysis also included case studies of recent developments showing that stormwater facilities accounted for only 7% of land consumption and only 9% on poorly drained sites. The County analysis further noted a lack of evidence from comparable jurisdictions to justify enlarging the stormwater deduction. For example, King County assumes that all public facilities, including parks and schools as well as stormwater, accounts for only 12% of land. Snohomish County's stormwater-only estimate is 5%. The recent Clark County findings are consistent with what our own public works departments have observed.

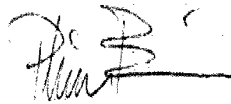
We respectfully recommend the Board not make these major changes, but rather stay the overall course it has set, with adjustments, as needed, at the conclusion of the process. As City representatives we are comfortable that this will provide a sufficient total amount of land for growth.

We look forward to continued discussion and again want to express our appreciation for the inclusive and efficient process you have led to date.

Sincerely,



City of Battle Ground



City of Camas



City of La Center



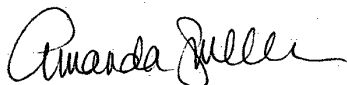
City of Ridgefield



City of Vancouver



City of Washougal



City of Woodland