



CP16#0640

April 9, 2015

Councilor David Madore, Chair  
Councilor Tom Mielke  
Councilor Jeanne E. Stewart

**Subject: April 14, 2015 County public hearing on the Comprehensive Plan update**

**Honorable Councilors:**

On behalf of the City of Vancouver, we offer the following in support of the joint cities letter dated April 8, 2015, findings in regard to growth assumptions. City correspondence, as well as County staff documents, indicates that existing UGAs with the cities' site specific expansions are fully adequate to accommodate anticipated long term growth. This letter provides further documentation in light of a recent Columbian article on population growth that occurred in 2014.

- **As reported by the Columbian, the US Census bureau estimates Clark County population grew 1.7% during calendar year 2014, slightly faster than other counties in the region for that year. The article did not report however, that individual years vary considerably, and in 2012 and 2013 Clark grew more slowly than Washington and Multnomah Counties.**
- **For this Comprehensive Plan update process, the Board last year adopted the OFM Medium long term forecast projecting 562,000 persons countywide by 2035, or an *average* increase of 1.12% per year, *over 20 years*. However, the OFM forecast did not assume every single year would meet the 20-year average, and in fact projected faster growth in the early years. The OFM Medium long term forecast is already being used by RTC for local long term transportation planning, and is fully reasonable for this update process, with whatever minor adjustments are needed to keep cities whole.**
- **The amount of land provided to accommodate growth is equally driven by development assumptions as well as forecasts. Last year the Board adopted assumptions that provide extra padding to ensure more than adequate 20-year residential land supplies are provided:**
  - **The Board increased the previous market factor assumption of the amount of additional residential land that must be added to account for otherwise developable land that won't develop over 20 years for market reasons.**
  - **The Board retained a second similar assumption, the not-to-develop factor, which further assumes 10% of unconstrained vacant residential land and 30% of underutilized land also won't develop for 20 years, also for market-only reasons.**
  - **The Board retained existing assumptions for the amount of residential land that won't develop for environmental reasons, or will be used for infrastructure.**

- **The Board retained existing assumptions for how densely urban residential land will develop, despite County Assessor data indicating clearly changing development patterns. Single family residential land is assumed to develop at an average density of 5 units per acre, despite the fact that new single family lots created in urban zones countywide since the last plan update in 2007 have a median density of 7 units per acre. The data further show that almost ¼ of all urban single family lots created for development countywide since 2007 are less than 5000 square feet in size, yet the land supply calculations assume all such lots will remain undeveloped for 20 years.**

**Beyond these technical forecasting issues are the policy impacts on the ground. This Board has mentioned a desire to change the weather, not just predict it. Improving the countywide ratio of jobs to housing was discussed at length during last year's adoptions. If population forecasts and residential land supplies are now significantly increased, jobs forecasts and supplies will then also have to be increased that much more, just to keep pace with, let alone improve, the current ratios. This would likely result in significant UGA expansions for cities, many of which are still catching up from the local 2007 expansions, the largest in state history.**

**Large UGA expansions in this update may outstrip the region's ability to provide adequate urban facilities and services. If the Board wishes to build conservatism into capital facilities planning, it could assume high levels of per capita demand for facilities. It could also assume faster than average growth will occur in the first 6-10 years of the forecast, an approach Clark County explicitly adopted in the last update. Either approach is preferable from a facilities planning standpoint to simply increasing population growth forecasts and residential land supplies, which in turn leads to more housing growth, greater need for facilities, and higher costs.**

**Thank you for the opportunity to provide input, and for similar opportunities in the past. As indicated in the joint cities letter, we request the Board maintain the general course it has set in this process regarding long term growth planning, with adjustments as noted in Issue Paper 4.2, provided they keep cities whole and do not trigger UGA changes they have not requested. UGA changes should also not be somehow mathematically triggered by rural policy. If new rural growth is enabled to the point where the County believes the previously assumed 90/10 urban-rural split is no longer appropriate, it should change that ratio, which has never been considered a goal, accordingly.**

**Sincerely,**



**Bryan Snodgrass, Principal Planner, City of Vancouver Community and Economic Development Dept.**