



June 24, 2014

Chair Tom Mielke
Commissioner David Madore
Commissioner Edward Barnes

Subject: City of Vancouver Testimony for June 24th Hearing on UGA growth allocations, planning assumptions, and values and principles.

Honorable Commissioners:

Thank you for the continued deliberative and inclusive review process and for County staff's work in the difficult task of integrating the various pieces of information for this Comprehensive Plan Update. ~~In our continued coordination efforts the City of Vancouver submits the following~~ testimony for the June 24th hearing

Support General Approach

Vancouver supports the approaches that you and your staff have discussed to date, to allocate growth among the UGAs based on the room they have to accommodate it, and to estimate those capacities based on the planning assumptions that have been developed and refined over the course of three previous Comprehensive Plan updates. We believe these are sensible approaches that can provide for economic development and allow Vancouver to meet its land use goals of serving and developing existing areas, without forced changes to UGA boundaries in this update cycle. We have heard similar visions from other cities.

Resolution Recommendation

Our recommendations focus on a few added sentences to the proposed resolution needed to help make these approaches happen. We would propose the resolution be clear that the numbers allocated to individual UGAs are draft and subject to refinement once UGA capacities are determined and land use implications known. This issue was raised by several cities at last week's worksession. No City should be forced by a pre-set formula to shrink or expand its UGA against its wishes unless there is a policy reason to do so. For the planning assumptions, the resolution should state that the full set of existing assumptions will be used, and the incomplete listing in the resolution table should be expanded to at least be consistent with Issue Paper 4 tables.

Planning Assumptions

A couple of points bear reinforcing regarding the planning assumptions. We would again caution against adopting assumptions beyond what data clearly indicate is needed. If more growth is desired, it should be done through the forecasts and allocations, which are then fully incorporated into land use, transportation and capital facilities plans. This Board has already taken this transparent approach by adopting the most aggressive jobs forecast. In some of the original local

plan updates, overly generous development assumptions and resulting excess land supply was a source of much of the unplanned and under-served growth that occurred.

Infrastructure deduction - Available data does not support a change to the infrastructure deduction estimate discussed recently. Stormwater land needs are only a portion of overall infrastructure land needs, and it's not clear that new stormwater mandates warrant changes to assumptions. This view appears consistent with the information presented in an April 7, 2014 memorandum from the Clark County Environmental Service Program Manager addressing this issue. See attached background information on this and other assumptions.

The existing assumptions are imperfect, but they have improved with each update cycle, and taken together they balance each other out to provide a reasonable total capacity estimate. If the Board chooses to open up the existing assumptions, there are a couple of areas where believe new data does warrant an update.

Process

The infrastructure assumption and others involve a good deal of technical detail from varying data sources. If the Board is inclined to revisit these or other assumptions it would be most open and informative to continue the public hearing on those items, and hold an informal worksession with input from interested parties to allow for questions, before attempting to decide through testimony in a public hearing setting.

Please consider the specific recommendations attached. Thank you again for the opportunity to comment, and of course feel free to contact us with any questions on these issues. For technical questions Bryan Snodgrass, Principal Planner is the primary contact. He can be reached at 487-7946 or bryan.snodgrass@cityofvancouver.us

Sincerely,



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Attachments

1. Specific Vancouver recommendations
2. Planning Assumptions Background

1. **City of Vancouver's specific recommendations (amendments in underline/strikeout):**

Resolution:

BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF CLARK COUNTY, STATE OF WASHINGTON, hereby adopts the Comprehensive Plan 2016 periodic update Planning Assumptions as those used in the 2007 countywide update process, including major assumptions highlighted shown in Table 1, the initial draft population growth and employment allocation for the preliminary allocations for initial review of urban growth areas 20-year period ending in 2035 as shown in Table 2 and the 2016 Board Principles and Values as shown in Table 3. This information will be used for the county's 20-year Comprehensive Growth Management Plan 2016 periodic update pursuant to RCW 36.70A.140. Draft growth allocations among UGAs may be revised once UGA capacities are determined, and through the remainder of the 2016 Comprehensive Plan Update process.

Table 1: Major Planning Assumptions

2016

Assumption	
20-Year Population Projection	562,207
Planned Population Growth (new)	136,844
Urban/Rural Population Growth Split	90/10
Assumed Annual Population Growth Rate	1.12%
Housing Type Ratio	75% single-family, 25% multifamily
Persons per Household	2.66
New Jobs	91,200
Jobs to Household	1:1
Infrastructure Deduction (Residential)	27.7%
Infrastructure Deduction (Commercial and Industrial)	25%
VBLM (definition of vacant)	\$13,000 residential, \$67,500 commercial and, industrial
<u>Redevelopment</u>	<u>2007 assumptions – 14,105 persons, 16,775 jobs</u>
<u>Public Sector Employment</u>	<u>7,400 jobs</u>
<u>Market Factor</u>	<u>10% residential, 10% commercial, business park, industrial</u>

Table 2: Initial draft Population and Employment Allocation

Urban Growth Area	Net New Population Growth Allocation	Net New Employment Growth Allocation
Battle Ground	17,543	11,635
Camas	12,361	12,503
La Center	3,551	1,367
Ridgefield	14,374	11,895
Vancouver	57,967	42,774
Washougal	6,615	4,766
Woodland	252	0
Yacolt	333	513
County	12,556	
Total	125,560	85,542

Board Principles and Values:

Allocation

- *Guided by City goals and the values identified (in the previous topics)*
- *Ground-truthing and capacity determinations will clarify/define the allocation (versus "assigned")*

Capacity Estimates

Use data-driven planning assumptions that do not under- or over- estimate growth capacity. Do not use assumptions to achieve policy goals.

2. Planning Assumptions Background

- a) Vancouver supports the recommendation to maintain existing assumptions, including infrastructure deduction:

Available information, particularly the April 7, 2014 Clark County Environmental Services memorandum on this issue, does not appear to support a change to the existing assumption that 27.7% of residential land and 25% of commercial and industrial land will be dedicated to infrastructure. Key points:

- Stormwater facilities represent only a portion of infrastructure dedication needs, with road by far the majority share
- Poorly draining soils where challenges of implementing new state stormwater mandates are greater represent only a portion of the Vancouver UGA, with most areas indicated as moderate to high on the County Anticipated Infiltration map.
- The County memo states that the net impact of changing to low impact development practices is to decentralize the storm system to smaller facilities, and further notes that recent County road standards have possibilities for using public rights-of-way for this. The memo also notes that Clark County does not impose impervious area limits, further improving flexibility in addressing the mandates.
- The County memo includes case studies, and reports that the average portion of project areas needed for stormwater is approximately 7%. Most importantly, even among those sites with poorly drained soils, the average increases to only 9.7%.
- The County memo finally notes a lack of justification from comparable jurisdictions to support a change to the assumption. It notes that the comprehensive Puget South Water Quality Management Plan makes no mention of added land needs to address stormwater management. It notes that King County projects that public facilities, including parks and schools as well as drainage accounts for only 12% of land, and that Snohomish County's stormwater-only estimate is 5%.

- b) If assumptions are to be revisited, new data suggests updates are needed to the following:

Including a Rural Employment Allocation.

- Current assumptions assume 10% of population growth will occur outside of UGA, but none of the job growth
- The Washington ESD forecast used to generate the Clark County target of 91,200 new jobs countywide adopted by the Board states that 14,000 of these new jobs will be in construction, forestry, and farming.
- Clark County is currently reviewing large scale Industrial land bank proposals.
- Clark County development codes have been liberalized in recent years to allow more economic activity in rural and resource zones.

The Board could select an assumption that 5% of total job growth will occur in the rural area. If more precision is desired, GIS could be used to determine current rural share, which could then be trended upward to account for the above factors.

Update urban residential lot size assumptions to be consistent with current data.

- Issue Paper 4 indicates that single family lots in UGAs, after accounting for infrastructure and critical lands, will develop at an average of 4-5 unit per acre. This equates to an average lot size of 9,680 square feet, which does not appear consistent with current data or market trends. An initial review of County assessor data indicates a median lot size of 6,838 square feet of new residential lots created in single family zones in UGAs countywide over the past five years (2009 forward).
- Similarly, we understand the VBLM currently assumes that none of the currently existing vacant residential lot less than 5000 square feet in size will be built on in the next 20 years. Many of these are in the 4000-5000 square foot range and were created as part of recent planned unit developments or other subdivisions catering to new market preferences. These should probably be included in capacity estimates in some form.

Consider implications of having both not-to-develop and market factor assumptions

- The current analysis assumes that 10% of vacant residential acres, and 30% of undeveloped residential acres will not develop over the next 20 years whether they have critical lands or not. It further assumes that residential land supplies should be expanded an additional 10% to account for a market factor. These assumptions appear redundant. They may also be inconsistent with recent GMA caselaw prohibiting separate duplicative assumptions that otherwise developable lands won't be built on for market reasons.

(<http://www.gmhb.wa.gov/western/decisions/2008/08-2-0021cPetreeFDO20081013.pdf> - see page 31)

c) Background on existing redevelopment assumptions adopted by Clark County in 2007

As noted in Issue Paper 4, existing assumptions include redevelopment estimates formally adopted by the County in the last update in 2007. These assumptions were adopted to account for private sector job and population growth that occurs on built lands, as existing structures are replaced, expanded, or just filled in over time with more employees. Redevelopment also accounts for growth that occurs as larger parking lots which the VBLM model does not include in its eligible inventory are developed with new buildings. Redevelopment accounts for a sizeable portion of 20-year growth, particularly in larger urban areas, and particularly for jobs. It will likely account for increasing shares in the future given increasing public and private sector expenses in serving and developing new areas, as opposed to making better use of existing lands. Previous estimates in the larger Portland metro region were that 50% of long term commercial job growth and 20% of long term industrial job growth would occur through redevelopment and infill.

Local redevelopment estimates may be smaller, but still considerable. In the earlier plan update cycles, Clark County adopted assumptions that a flat percentage of total countywide population and employment growth would occur on built lands through redevelopment. In 2007 the County adopted assumptions that redevelopment on built lands in the Vancouver UGA would account for 13,386 new jobs and 14,105 new persons over the course of the planning period, as memorialized in the attached letter from the County Commissioners to the City of Vancouver. These redevelopment numbers were incorporated in the land use analysis used to size the Vancouver UGA, and in the countywide transportation model.

It should be noted that those redevelopment assumptions adopted by the County in 2007 were only half of what Vancouver had recommended and adopted in our own planning. The Vancouver Comprehensive Plan projects that redevelopment over 20 years will account for 35,523 new jobs and 29,639 new persons in the VUGA. Most of this is assumed within city limits, and is primarily driven by growth anticipated in a range of subareas planned for growth and economic development, including downtown, the Fourth Plain corridor, the Port of Vancouver, the SW Peacehealth medical center, the eastside Riverview Gateway, Evergreen Airport, the Columbia Business Center, Section 30, Columbia Tech Center, and others. (Vancouver Comprehensive Plan Appendix C).