

**Schroader, Kathy**

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**From:** Orjiako, Oliver  
**Sent:** Tuesday, May 24, 2016 10:44 AM  
**To:** Snodgrass, Bryan, Cnty 2016 Comp Plan, Tilton, Rebecca, Wisner, Sonja  
**Cc:** steve.dijulio@foster.com, Albrecht, Gary, Alvarez, Jose, Anderson, Colette, Euler, Gordon, Hermen, Matt, Kamp, Jacqueline, Lebowsky, Laurie, Lumbantobing, Sharon, Orjiako, Oliver, Schroader, Kathy  
**Subject:** RE Vancouver submittal for 5/24/16 hearing

Hello Bryan

This is to acknowledge receipt of your submittal to the Planning Commission and County Council for the May 24, 2016 Joint hearing. Staff will forward the comment to the PC and CC and include it in our index of record. Thank you.

Best Regards,

Oliver

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**From:** Snodgrass, Bryan  
**Sent:** Tuesday, May 24, 2016 10:28 AM  
**To:** Cnty 2016 Comp Plan; Tilton, Rebecca; Orjiako, Oliver; Wisner, Sonja  
**Subject:** Vancouver submittal for 5/24/16 hearing



May 24, 2016

Honorable Chair Boldt and Clark County Councilors  
Honorable Chair Steve Morasch and Clark County Planning Commissioners

**SUBJECT:** City of Vancouver Recommendations on 2016 Comprehensive Plan Update for May 24, 2016 Hearing

- **Adopt 2015 County Planning Commission recommendations (EIS Alternative 3) including the site specific small city proposals**
- **Do not adopt the Preferred Alternative unless it can be demonstrated how it will comply with GMA, and how infrastructure and other needs will be met**

On behalf of the City of Vancouver, thank you for the opportunity to comment on the Comprehensive Plan Update, and for your time and effort on this complex and very important project. We note that this work has included some key decisions with widespread community support, not just areas of controversy. For example, improving the ratio of jobs-to-housing countywide was identified as a key objective early in the process, and was then followed up with countywide growth forecasts and land supplies that reflect that priority. We also wish to acknowledge the forthright work of County staff throughout, and applaud the formal statewide recognition that we understand the public process component of this update is now receiving.

For final adoption Vancouver also supports the County Planning Commission recommendations, made twice in fall 2015, to adopt EIS Alternative 3. We believe this is further supported by recent information.

I would like to offer the following comments for the public record and for your consideration:

**1. Alternative 3 provides fully adequate growth in urban and rural areas**

The countywide growth forecasts adopted by the Board for all the alternatives provide for ample growth, and have been supported by the cities staff and officials since their adoption in December 2013 and April 2014. The adopted jobs forecast was the largest option provided by Washington ESD.

Economist Scott Bailey, and the population forecast accommodates 15,000 more persons than the Washington OFM formally projects as most likely to occur. In response to recent concerns raised about the population forecast, a May 2, 2016 joint analysis by the cities staff found there was not credible evidence that OFM is significantly under-estimating population growth, and in any case the adopted County forecast is significantly higher than OFM's most likely prediction. The adopted County forecast averages out to an annual growth rate (1.26%) that is faster than the state of Washington or Portland area is planning for over similar time frames, and faster than Clark County itself has grown since the end of the national recession in 2010. To ensure land supplies are fully adequate to accommodate the forecast, Clark County has also increased its "market factor" requirement for additional land. The GMA further requires that local 20 year forecasts and land supplies be updated at least every eight years, ensuring supplies remain adequate even if future growth occurs faster than anticipated.

In rural areas Alternative 3 provides for jobs growth in rural centers, at the newly proposed Rural Industrial Land Bank, and through various employment options on rural and resource properties which have been expanded in recent years. Rural housing growth can occur on any of the approximately 5,800 *existing* vacant and underutilized rural lots identified by a recent review of County Assessor data, and/or on the over 7,000 *new* rural lots that can be created under Alternative 3 (FEIS p1-6).

**2. There remains no indication how the Preferred Alternative would be served, or comply with GMA**

The City of Vancouver supports a dynamic rural area with a range of opportunities for rural residents and would normally not advocate on rural policy issues, but the latest information confirms that the Preferred Alternative may have negative impacts countywide. Over 5,000 mostly Agricultural and Forest designated properties are proposed to be upzoned, allowing for creation of approximately 8,000 future lots. According to the recent FEIS, needed transportation facilities could be "prohibitively" expensive, only partially be offset by impact fees, and if built would "change the character of rural Clark County" (Issue Paper 8 FEIS pS-5, 7-11, 16). Impacts to cities and the unincorporated urban area include added traffic and infrastructure needs in urban areas near rural development. There would also likely be less financial assistance for the large backlog of existing urban capital project needs, as newly required rural projects will compete for finite state and federal grant funds.

If adopted, the Preferred Alternative's infrastructure costs may occur sooner than otherwise anticipated as residents attempt to divide and develop their properties before such options are potentially halted or reversed by a legal ruling. We would respectfully request the Planning Commission not reverse its prior recommendations without an indication of how needed infrastructure would be provided, and how safety impacts would be addressed. 2015 Commission

deliberation noted concerns about adding significant traffic and access points to the rural road network

Legal concerns were also discussed in 2015 deliberations, as the Planning Commission noted that local attorneys representing both conservation and development interests had testified that proposed rural and resource land upzones were inconsistent with GMA. To our knowledge there have been no statements to the contrary from County Counsel at that time, or since. County staff has since suggested mandatory clustering as a potential means of potentially improving legal defensibility, but this proposal does not appear to have Board or community support. As with infrastructure issues, impacts from an adverse legal ruling would hit hardest on Clark County and its citizens, but cities may also be affected. Newly adopted City plans might be invalidated along with the County Comprehensive Plan, and citizens and jurisdictions throughout the County will be impacted if the County becomes ineligible for grants

Adopting the Preferred Alternative is also unlikely to noticeably improve overall housing affordability countywide, as it would result in new large rural properties well beyond the means of most urban and rural residents. According to the latest County Assessor data, the current median value of 10-acre rural properties with a new house or mobile home is \$405,000. For similar one-acre properties it is \$386,000. Sales prices are likely to be higher.

Again, we thank you for the opportunity to comment throughout this process. If the County does wish to expand rural housing options to the point where they match or approach options available in the early 1990's before the advent of GMA, we respectfully request that this be explored in upcoming years as was also recommended by the Planning Commission.

Sincerely,



Chad Eiken, AICP, Director

Community and Economic Development Department

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