

From: [Calvert, Maren L.](#)
To: [Susan Ellinger](#); [Jacqui Kamp](#)
Subject: RE: Middle housing code changes [IWOV-pdx.FID4948481]
Date: Tuesday, April 4, 2023 10:25:38 AM

Susan and Jacqui,

Thank you for offering to consider ideas and input regarding rural housing code changes. I recognize and understand your focus on the urban areas of the County as the first place for change, because given the density, those changes might return the biggest bang for the buck. I appreciate and applaud the County's efforts so far and I am excited to see the changes go into effect. This community needs more homes. We desperately need to remove barriers that no longer serve our public policy goals and have inadvertently created – or contributed to – this housing crisis.

To that end, would the County be willing to consider a few small changes outside the UGA that could provide immediate housing relief? The changes I propose below would immediately preserve existing middle housing and could potentially expand middle housing options in the rural areas without requiring any additional buildings to be built. This could be accomplished if the County: (a) expands options for temporary use permits for manufactured homes both within and outside the UGA; (b) would allow existing or previously permitted temporary use manufactured homes to become permanently permitted uses; and (c) allow detached ADUs in rural areas (including manufactured homes) outside the UGA.

Currently, temporary use permits for manufactured homes are only allowed for people experiencing hardship. The term "hardship" though, is unnecessarily narrow. It only applies to (A.1) the aged or infirm; (A.2) a full-time employee of the land; (A.3) a relative over the age of 62 with an AGI below 50% of the median family income; and (A.4) relatives or a purchaser of forest or ag land. CCC 40.260.210. Could this definition of "hardship" be expanded? Even if only temporarily? For example, could the restriction to only relatives be removed? What if a land owner wanted to help someone from their church? Or wanted to rent a manufactured home to help prevent a neighbor from becoming homeless? Or if a tenant could no longer afford full rent, but could afford a free or reduced price manufactured home – currently a landlord outside the UGA would not be allowed a temporary use permit to provide that housing. The age restriction is also unnecessarily limiting. There are people below the age of 62 with an AGI below 50% that are experiencing hardship. Allowing those people to temporarily live in a manufactured home better than allowing (or requiring them) to become homeless. Expanding the definition of "hardship" under CCC 40.260.210, even if only temporarily, would immediately allow people in the community to work together to use existing manufactured homes to help solve this crisis in our community.

Beyond the temporary solution, if manufactured homes that were previously permitted for temporary uses had a path to become permanently placed uses, then land owners would not be required to move or tear down manufactured homes that currently exist but are not being (lawfully) used. In this time of crisis, if we afforded a path to a lawful use for those previously permitted manufactured homes – either as temporary or permanent uses (eventually) – we could use EXISTING

resources to provide housing NOW.

And this leads to the third proposed change outside the UGA. If a temporary use permit is to become a permanent placement/use permit, the definition of ADU in the rural areas would have to change. Currently, rural areas only allow "attached" ADUs. CCC 40.260.022. In this time of a housing crisis, I'm not convinced this restriction still make sense from a public policy perspective. In fact – given the desire to keep density in the rural areas lower than inside the UGA – this restriction actually seems a bit backwards. In urban areas where land is scarce, the County allows **detached** ADUs, including manufactured homes. In the rural areas, where land is more plentiful, ADUs must be **attached** – i.e. in the rural areas, if an ADU is to be built, the dwelling units must be closer together, increasing density as compared to the same size lot inside the UGA. If manufactured homes could be permanently permitted as an ADU outside the UGA, the County's housing options on larger rural lots would become more plentiful.

In short -- if people are living in manufactured housing currently – whether permitted or unpermitted – I'd like to find a way to help them stay there, even if only temporarily. Enforcing the code sections above, as written, will force (or has already forced?) some people to become homeless simply because the definitions in the Code did not apply to them. We can fix this. Manufactured housing of any kind is better than a tent.

Thank you for reading this. Please know, I am not trying to upset the apple cart or undo all the good work you and the County are already doing. I am excited about the changes you are making. Please feel free to call me anytime.

Thank you,

Maren

SCHWABE, WILLIAMSON & WYATT

CLIENT SHOWCASE | INNOVATING FOR GOOD

D: 360-597-0804

From: Susan Ellinger <Susan.Ellinger@clark.wa.gov>

Sent: Friday, March 24, 2023 4:18 PM

To: Calvert, Maren L. <MCalvert@schwabe.com>

Subject: FW: Inability to hear me [IWOV-PDX.FID4948481]

Hi Maren –

Thank you for your comments. Jacqui asked me to respond to you in case you have any additional questions as she will be off next week.

The area within the UGA is the focus for the county because the urban jurisdiction has comprehensive plan and zoning designations that allow different types of housing (duplex, triplex, quadplex, condominiums, multifamily apartments, etc.) to be built. This is also where urban services

are available and can be provided in an efficient manner. This area has the opportunity to significantly expand middle housing development options in low and medium density zones without reducing land for farms, forests, and rural uses.

Supporting growth in these areas is encouraged by GMA and the Washington State Department of Commerce as outlined in [this article](#) and on [this page](#). A good summary was provided by Dave Andersen, managing director of the Growth Management Services unit who stated, *“Based on the large number of housing needs at the lower income bands, many communities will need to change the way they plan for housing and plan for more apartments, condominiums, moderate density housing such as middle housing, and accessory dwelling units.”*

With implementation of the HOSAP, development opportunities are still supported in the rural areas as they are today. As you suggest, placement of homes with smaller footprints and attached ADUs are permitted on existing rural lots. And creation of new lots within the established rural densities will continue to be permitted.

If you are interested, we are hosting two virtual information sessions on Tuesday, March 28, including one on the housing requirements for 2025 Comprehensive Plan update. You can find more information about the sessions [on this page](#).

Please let us know if you have any other feedback. Thank you!



Susan Ellinger

She/her/hers

Planner III

COMMUNITY PLANNING

564.397.4516



From: Calvert, Maren L. <MCalvert@schwabe.com>

Sent: Friday, March 24, 2023 11:38 AM

To: Jacqui Kamp <Jacqui.Kamp@clark.wa.gov>

Subject: RE: Inability to hear me [IWOV-PDX.FID4948481]

Jacqui,

I really appreciate the follow up. Thank you.

I looked at the County's Housing Options Study and Action Plan website and found the FAQs. Page 1 says: "The proposed changes affect the low-density residential zones within the unincorporated Vancouver Urban Growth Area (UGA), including neighborhoods such as Hazel Dell, Salmon Creek, Felida, Pleasant Highlands, Minnehaha and Orchards." Does that mean people who live outside the UGA won't benefit from any of the changes?

I'm concerned about that because I have an increasing number of clients and potential clients who are struggling to meet permitting requirements or finding housing options outside the UGA. They've considered ADU or manufactured homes or tiny home or cottage home options to try to keep costs down for themselves, their employees, their church members etc. If the changes won't benefit them, I fear we will be missing a big opportunity to fix the housing shortage.

Maren

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CLIENT SHOWCASE | INNOVATING FOR GOOD

D: 360-597-0804

From: Jacqui Kamp <Jacqui.Kamp@clark.wa.gov>
Sent: Friday, March 24, 2023 11:30 AM
To: Calvert, Maren L. <MCalvert@schwabe.com>
Subject: RE: Inability to hear me [IWOV-PDX.FID4948481]

Hi Maren,

Please let me know if I can provide any other information for you.

Thank you for attending last night! My apologies for any difficulties with Webex.

Jacqui



Jacqui Kamp, AICP

Program Manager

COMMUNITY PLANNING

564.397.4913



From: Calvert, Maren L. <MCalvert@schwabe.com>

Sent: Thursday, March 23, 2023 6:49 PM

To: Jacqui Kamp <Jacqui.Kamp@clark.wa.gov>

Subject: FW: Inability to hear me [IWOV-PDX.FID4948481]

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.

Jacqui,

Resending but spelling you last name correctly. 😊

Maren

SCHWABE, WILLIAMSON & WYATT

CLIENT SHOWCASE | INNOVATING FOR GOOD

D: 360-597-0804

From: Calvert, Maren L.

Sent: Thursday, March 23, 2023 6:47 PM

To: 'jacqui.camp@clark.wa.gov' <jacqui.camp@clark.wa.gov>; 'christine.cook@clark.wa.gov' <christine.cook@clark.wa.gov>; 'steve.faust@clark.wa.gov' <steve.faust@clark.wa.gov>

Subject: Inability to hear me [IWOV-PDX.FID4948481]

Jacqui, Christine, and Steve,

Apparently my WebEx is not working correctly. It showed unmute on my side, but apparently you couldn't hear me. My question was:

Has there been any conversation about lifting, easing, or temporarily suspending the restrictions on

placement of manufactured homes?

Please ask this question for me, if you can. Thank you!

Maren

Maren Calvert

Shareholder

Pronouns: she, her, hers

D: 360-597-0804

mcalvert@schwabe.com

SCHWABE, WILLIAMSON & WYATT

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