

January 25, 2023

Susan Ellinger, Planner II
Clark County Community Development
Public Service Center
1300 Franklin Street
Vancouver, WA 98660

Via email: Susan.Ellinger@clark.wa.gov

RE: Feedback regarding the Approved 2022 Clark County Housing Options Study and Action Plan

Dear Susan,

I have reviewed the final approved Clark County Housing Options Study and Action Plan (HOSAP) approved on May 17, 2022 and have prepared feedback contained in this letter as an individual and not as a representative of my employer or any of my other organizational affiliations. I have lived and worked in Vancouver for over five years. My professional experience has largely involved land use and urban planning in the private sector for cumulatively about ten years and my feedback is reflective of the experiences I have accumulated during this time. My feedback is also reflective of someone who personally deeply cares about access to affordable housing.

The housing shortage in Clark County is one of the most salient issues facing our community and it will only worsen without implementable strategies to address the underlying causes. Presently, it is estimated that approximately fifty percent of Clark County residents are renters, which I believe is not only indicative of a low supply of different and affordable housing options available but also that there are major barriers to homeownership. The various barriers to homeownership are complex and for this reason requires the careful examination of all contributing factors so that solutions presented effectively address the barriers.

The policy and regulatory review included in the HOSAP reviewed regulations that relate to the development of housing, from the conceptual Comprehensive Plan level to the development code specifics. However, the recommended strategies in the HOSAP omit examination of the procedural influence on the permitting process, overlooking a major barrier to the development of affordable housing. Findings regarding average permitting timelines and fees were not summarized and included in the report.

In order to facilitate the production of housing, whether by individuals or development firms, necessary permitting must be obtained. The long permitting review timelines and high costs of permitting presents a major barrier to the development of affordable housing. It is not unusual for permitting to take six months to a year to obtain, by that time funding becomes precarious or runs out for individuals looking to build a home. Permitting costs, inclusive of impact fees, and interest accrued on development loans during long permit review timelines is ultimately passed onto the homeowner, adding to the cost of housing, making it less affordable. Updates to the zoning code and affordability metrics are undoubtedly necessary in order to expand the types of housing permitted but it is ultimately the current permitting process and associated fees which will help to maintain a low supply of housing that is rendered less and less affordable by high and increasing permitting fees and review timelines.

There is no streamlined review procedure available in Clark County where concurrent reviews of land use applications, engineering and building permit applications or any combination of these are possible. The County is not currently considering this option for all housing development permitting, which is a missed opportunity to address review timelines and permitting costs that affect the housing supply. As a professional land use planner in the private sector, I see firsthand how steep permitting costs, development impact fees and the costs resulting from long review timelines get passed on to and is borne by the homeowner.

The housing crisis this community faces deserves ongoing thoughtful consideration and to the ways in which barriers to housing production and affordability can be addressed, building inroads into broader homeownership which remains the cornerstone of intergenerational wealth building. Implementation mechanisms matter, without which the important goals of increasing access and availability of affordable housing cannot be realized. I strongly encourage the County to fully assess their permitting review procedures, timelines and fees, all of which have real life impacts on the quality of life possible for Clark County residents to attain. Reducing development review timelines and permitting fees need to be broadly applied, and not just applied to select projects, as barriers to affordable housing is an issue affecting nearly all of Clark County residents. The HOSAP objectives of reducing barriers to affordable housing will be rendered ineffectual without examining the County's overall permitting process. The County's permitting process is largely discretionary and has great potential to help increase the production of affordable housing and make the objectives of the HOSAP actionable.

Thank you for your time and consideration.

Sincerely,

Ingrid S. Friedberg