

**From:** [Rebecca Messinger](#)  
**To:** [Oliver Orjiako](#); [Sonja Wiser](#); [Jacqui Kamp](#); [Jenna Kay](#)  
**Subject:** FW: HOUSING OPTIONS STUDY ACTION PLAN is fatally flawed  
**Date:** Tuesday, November 29, 2022 1:40:38 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Please see the below public comments. Thank you!



**Rebecca Messinger**  
Clerk to the Council  
COUNTY MANAGER'S OFFICE

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**From:** Kathleen Otto <[Kathleen.Otto@clark.wa.gov](mailto:Kathleen.Otto@clark.wa.gov)>  
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**To:** Rebecca Messinger <[Rebecca.Messinger@clark.wa.gov](mailto:Rebecca.Messinger@clark.wa.gov)>  
**Subject:** FW: HOUSING OPTIONS STUDY ACTION PLAN is fatally flawed



**Kathleen Otto**  
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**Sent:** Tuesday, November 29, 2022 12:20 PM  
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**Subject:** HOUSING OPTIONS STUDY ACTION PLAN is fatally flawed

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Clark County Council  
P.O. Box 5000  
Vancouver, Washington 98666

November 29, 2022

FOR THE PUBLIC RECORD

Dear Councilors,

Clark County Citizens United, Inc. has read over the proposed HOUSING OPTIONS STUDY ACTION PLAN and realize there are stark omissions of available and affordable housing, in its many glorified pages. Rural landowners, rural housing, and critical housing needs of the rural people, who consist of almost 50% of Clark County's population, is not even mentioned. There is absolutely no mention of how the county will meet the private property rights mandate of the Growth Management Act. CCCU also see the section that includes public comments, is void of any of CCCU's testimony. The focus of this report is so narrow on behalf of Vancouver, that not even the housing needs of the other cities in Clark County, are mentioned. Such poor planning and accommodation of critical housing for all people living in the county shows the discrimination and bias that exist in Clark County. Equity and inclusion is no where to be seen.

CCCU has copied and pasted excerpts of the Plan to dive into important considerations the Council must make, as it regards available and affordable housing for all county people. The following is that information, with CCCU comments for the record.

Sincerely,

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc.  
P.O. Box 2188  
Battle Ground, Washington 87604

### **HOUSING OPTIONS STUDY AND ACTION PLAN**

The unincorporated Vancouver Urban Growth Area is the focus of this plan as the county's urban jurisdiction. **CCCU notes: The title of this Plan is "Housing Options", but at its very beginning the options are confined to Vancouver. What if there are people living in tents on the streets of the other Clark County cities and in rural areas? How does this Plan benefit them? It doesn't. Clark County is not only responsible for "urban" housing, it is also responsible for rural housing.**

### **OBJECTIVES**

The following HOSAP objectives were developed based on key findings from community outreach and research and approved by the PAG to guide the creation and evaluation of action plan strategies.

1. Encourage housing development that meets the needs of middle-income households who are not being served in the current housing market. **CCCU notes: This Plan does nothing to address these households in rural areas.**
2. Develop strategies to support the development of housing that is affordable to low, very low, and extremely low-income households. **CCCU notes: Rural people are known for low, very low and extremely low households. The USDA provides for school meals in the rural areas at a much greater rate than in the urban area. Yet, no strategies are being made to support the development of affordable housing in these areas.**

3. Encourage diversity in housing types and tenure (rental/ownership), including expanding middle housing options and increasing multifamily feasibility. **CCCU notes: This diversity is completely missing in the rural areas. With large lot zoning, the rural area only grew by .01% because of the available land to provide diverse housing types in those areas. Today, one has to be very rich to afford any housing in rural areas, even though rural landowners want to provide land that would address the middle income population.**

4. Encourage the creation of a broad range of housing sizes to match the needs of all types of households (families, singles, students, older adults, disabled, or other unique population groups), with a focus on 1-2 person households not being served in the current housing market. **CCCU notes: There is no such thing as a "broad range of housing sizes to meet the needs of all types of households", in rural areas. Why have they been left out of the equation? They are just as important as urban people when it comes to a roof over their heads. How is this county going to provide agriculture and forest products, when folks wanting to provide those services cannot afford to buy land and housing to live in those areas?**

5. Guide development of diverse housing options to areas with access to transportation corridors and transit, commercial services, schools and parks, and conversely, support development of those same amenities in areas where more housing is added. **CCCU notes: Rural people can be served by a railroad, that cuts through all of the rural areas. Small towns, cities and Lamrids provide any commercial services that rural people need. There are many rural schools throughout the county and almost all parks are situated in the middle of rural areas. Yet, those things are being reserved for only urban people, regardless of their location. Where is the equity and inclusion in this type of planning? It appears to be completely discriminatory.**

**HOUSING OPTIONS HO-1** Reduce minimum lot sizes for existing permitted housing types in low and medium-density zones to use existing land more efficiently and make supporting revisions to maximum densities that align with new lot sizes. **CCCU notes: This is exactly what the rural area needs to do, to provide an efficient way to develop those lands. Large lot zoning hamstrings efficient densities and affordable housing**

**INTRODUCTION** Clark County and other communities across Washington are struggling to provide the variety and quantity of housing options that residents need. New strategies are needed to help ensure future generations have access to affordable, quality, and diverse housing opportunities. **CCCU notes: Does the future rural generation also have access to "affordable, quality and diverse housing opportunities"? Or are they being forced to live in an environment that is foreign to them. This is housing discrimination and bias. The Council is responsible for countywide housing needs, both urban and rural.**

### **Public Participation Goals**

Public Participation Goals included:

**Social justice and equity.** This goal strived to recognize that policy and planning decisions about housing **do not impact everyone in the same way** and that policies and zoning regulations that restrict housing types **limits the opportunity** for many people to find housing **that fits their budget within the community in which they want to live.** Strategies to work towards this goal were reflected in the Project Advisory Group make-up and through partnership with local organizations who serve the county's most vulnerable community members. **CCCU notes: There was no one on the Project Advisory Group that represented rural people and rural housing needs, and no one was there to assure that private property rights were protected. But this planning statement is very profound, as it explains what the county must do on behalf of rural people. Rural and property rights are completely missing and need to be addressed. Social justice and equity are not being served.**

**In the 2021 legislative session, HB 1220,** now codified as RCW 36.70A.020, substantially amended the housing-related provisions of the Growth Management Act (GMA). These updates strengthened the GMA housing goal from "Encourage the availability of affordable housing to all economic segments of the population" to **"Plan for and accommodate housing affordable to all economic segments of the**

population of this state." During the upcoming periodic update of the county's comprehensive plan due in 2025, the county will continue to review policies to ensure they are consistent with the updated goal.

**CCCU notes: This mandate could not be more clear. Yet, planning staff has led the Council in another direction that will only benefit Vancouver. Councilors must read this sentence over and over again, and assure the population living in Clark County, that they are being compliant to this GMA mandate. To leave rural people out of this directive is clearly biased and discriminatory.**

**The GMA includes specific requirements for how cities and counties should plan for housing.** Implementation of the GMA is guided by 14 overlapping goals. As noted above, the GMA housing goal updated in HB 1220 and codified as RCW 36.70A.020, is to **"plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."**

**CCCU notes: How has this Plan accommodated all economic segments of the population? Is there not economic segment in the rural area? How does this Plan accommodate housing affordable to all economic segments in the rural area? How does this plan provide for a variety of residential densities in the rural area? How does this Plan preserve existing housing stock? The answer is that it doesn't. The Plan leaves all of that out of the planning scheme for rural people.**

#### **Phase 1-**

Understand the Issues through stakeholder interviews and an issue assessment to identify the primary housing issues and interests regarding regulatory barriers to creating a more diverse variety of housing types affordable to low-income and moderate-income households in the project area. **CCCU notes: The "project area" was supposed to be the entire county population, but half of it was left out. CCCU, as a stakeholder gave numerous items of testimony for the record regarding the rural needs. But that is not included in this Plan and report.**

**Phase 2-Review and Analysis:** • Data Collection, Inventory, and Analysis to provide an analysis of housing supply, demand, needs, and preferences throughout the unincorporated Vancouver Urban Growth Area, to provide context for evaluating potential actions. **CCCU notes: There is much data and analysis that shows the ability for future rural housing is almost gone. The demand is most certainly there, as small rural homes are being bid and sold for a million dollars plus. That is not sustainable. The Council actions must address this disparity in rural areas.**

**Policy and Regulatory Review** of county comprehensive plan housing policies, zoning, and other regulations to identify any barriers to creating a more diverse variety of housing types at a variety of price points in the project area. **CCCU notes: This is where the "rubber hits the road". The Clark County Council must understand and act on the critical housing shortages in the rural areas, regardless of what staff directs them to do. What the Council has before them is a staff driven policy, that does not reflect the needs and wants of the county population.**

**PUBLIC PARTICIPATION** The public engagement process was guided by a Public Participation Plan. The intent of the Public Participation Plan was to ensure that the county facilitates a thoughtful, open, and **equitable process** to provide residents, workers and other interested parties meaningful opportunities to discuss housing challenges and develop solutions for their communities. **CCCU notes: This Plan process was far from "equitable". Nor was it thoughtful or open. There was no meaningful opportunity to discuss challenges and develop solutions for their communities. The rural population was left out. That is discrimination and bias in housing.**

**Public Participation Goals** Public Participation Goals included: **Social justice and equity**. This goal strived to recognize that policy and planning decisions about housing do not impact everyone in the same way and that **policies and zoning regulations that restrict housing types** limits the opportunity for many people to find housing that **fits their budget within the community in which they want to live**. Strategies to work towards this goal were reflected in the Project Advisory Group make-up and through partnership with local organizations who serve the county's most vulnerable community members.

**CCCU notes: This Plan is far from any "social justice and equity" goal. Only urban people will be allowed to benefit from this goal. The rural population of vulnerable members has been completely left out.**

**Accessible participation.** Accessible participation sought to provide low-barrier opportunities for all communities in the project area to have a say in the decision-making process. Due to the COVID-19 pandemic, most events were online with both computer and phone options made available. Project communications included information on how to request translation of project materials. Project communication included social media. **CCCU notes: This Plan was prepared well in advance of the presentation to the public. There is much glorified comments about all of the "public outreach" but the reality is that the decision was made well in advance of any presentations.**

**Meaningful participation.** To achieve the goal of meaningful participation, the county strived to provide public participants with the information and tools they needed to feel knowledgeable and informed, listened to its constituents and heard about their lived experiences, provided engagement opportunities early and throughout the project process, and public feedback was discussed with the Project Advisory Group and shared with the Planning Commission and County Council. **CCCU notes: One can clearly see, in the public process section of the Plan, most of the comments were made by the building industry. CCCU was once told that whatever the county dictates to them, they simply do, because they must build housing in areas where they are allowed. They don't have time or money to argue.**

**Zoning.** Discussion focused on the **restrictive nature of zoning, and zoning that doesn't necessarily reflect existing development patterns.**

**Land Supply.** Land availability is referred to as one of the most difficult challenges in Clark County

**Location** Criteria for New Housing Types.

Emphasis on the location of new housing development is focused on areas where there are fewer housing opportunities. **CCCU notes: In all of these categories, zoning, land supply and location, Clark County has dropped the ball and drags their feet in allowing this restrictive zoning to be removed. It could not be more evident that in the rural areas.**

### **Displacement Concerns**

Some interviewees noted the importance of **working towards equity** when reviewing policy and regulations for change to ensure no group is disproportionately affected.

Who lives in the Study Area today?

The majority of households (73%) in the Study Area, across all household sizes, are homeowners. Most households (58%) are made of one or two people and about 46% of all households are living in a three-bedroom housing unit. The majority of households (73%) in both the Study Area and Clark County are composed of married families. 36 percent of all households in the Study Area are households with children.

Within the Study Area, 14% of residents in the Study Area are 65 or older. Forty percent of residents in the Study Area are between the ages of 40 and 64. About 20% of the population in the Study Area experiences a disability (most commonly ambulatory difficulty and cognitive difficulty).

The Study Area and Clark County share a similar ethnic and racial makeup. The largest minority group in the Study Area are residents who identify as Hispanic or Latino of any race (9.1% of residents). In the Study Area, less than 5% of households identify as having limited English proficiency. Most people who live in the Study Area do not work there, which adds to their transportation costs.

While the Study Area has seen an increase in employment since 2012, most workers living in the Study Area still commute to their jobs, often more than 45 minutes away. Jobs further away from a household's home increases their transportation expenses, resulting in less disposable income for other essential

needs. There are few industries that have jobs accessible by transit.

What are the current housing conditions in the Study Area?

Housing is getting increasingly expensive in the Study Area. Both ownership and rental housing costs have increased about 4% annually since 2015 in the Study Area

**Income - \$87,900 \$105,500 ) - (100% of MFI) - price monthly rent OR home sales price \$2,200 per month - price of home - \$308,000- \$352,000 CCCU notes: This statistic is far removed from the statistics in the rural area, and even in the other cities. Housing and rent has tripled, in the rural areas, and is increasing exponentially. But, the county is not proposing any policies to relieve that cost burde.**

**HOUSING ACTION PLAN Objectives:**

The following HOSAP objectives were developed based on key findings from community outreach and research, and approved by the PAG to guide the creation and evaluation of action plan strategies. Following each strategy is a table indicating its potential to impact one or more of these objectives. It will depend on how the strategy is implemented as to its actual impact.

**1. Encourage housing development that meets the needs of middle-income households who are not being served in the current housing market. CCCU notes: This should be a countywide process.**

**Strategies**

To develop HOSAP recommendations, the PAG started with a framework developed by the Washington State Department of Commerce, and refined it to meet the needs of Clark County. The list was comprised of categories that included:

- A. Expand Zoning Permissions for Housing Development
- B. Modify Existing Regulatory Tools
- C. Process Improvements
- D. Affordable Housing Incentives
- E. Funding Options
- F. Other Strategies
- G. Displacement Strategies

**6. List of stakeholders** Clark County will engage multiple stakeholder groups, including the following: • **CCCU notes: The environmental and building communities are at the table, but landowners and provide property rights advocates are missing. The 14 GMA goal consider all of those goals to have equal footing in any county Plan. The Council must understand this concept and assure that any planning scheme, must include representatives of this planning goal.**

Clark County community members, especially those that live/work within the project area • Affordable housing providers and advocates • Building/development (nonprofit and for-profit)/real estate community • Business community • Cities • Communities of color • Community-based organizations • County agencies • County commissions/advisory boards (Planning, Youth, Aging, Development and Engineering, Parks, etc.) • Cowlitz Indian Tribe • Economic development • Environmental community • Faith-based • Health care • Housing organizations • Neighborhood associations • Older adults • Public service providers (C-TRAN, Clark Regional Wastewater) • Schools and higher education • State Government Agencies • Youth

**Zoning.**

Discussion focused on the restrictive nature of zoning, and zoning that doesn't necessarily reflect existing development patterns

### **Displacement Concerns.**

Although rising housing costs are consistently emphasized, some do not view displacement as a significant challenge for the county

### **RECOMMENDED INTERESTS TO INCLUDE ON PROJECT ADVISORY GROUP (PAG)**

### **APPENDIX A. INTERVIEWEES AND SURVEY RESPONDENTS, FOCUS GROUP PARTICIPANTS**

What types of housing and housing needs are being served by recent development? Who isn't being served?

- The developments that are going in are trying to cram as many homes in as possible. People don't have enough room to put their stuff in the garage and driveway (jet skis to cars), so people have to park in neighborhoods where there is insufficient parking. We have to deal with from a customer service perspective: new residents of subdivisions are angry because there's nowhere for children to play, nowhere for them to park, and no connections to places that they want to walk. You move into new townhouse, and there's no on-street parking because of the driveways, and everybody's garage is full of junk, and they are putting stress on the existing system. How are we dealing with that 8 pressure? And then there's pressure on the prime commercial lands to be developed as self-storage to store the stuff that doesn't fit in their garage

Bought shared home with my daughter. That is a trend. It took more than a year to find a home to meet our needs. There are not enough multi-generational homes to meet the need. It's difficult to find those. Many in my age group are looking for a single-story home without stairs. All of the multi-floored homes aren't meeting those needs. There are physical barriers for disabled people. Society is stepping up to that, but not strong enough. Concern about park impact fees. Feeling challenged to provide affordable housing. Can't put a big enough bold mark on affordability

As hear from developers, it is difficult to work with Clark County and some cities are easier to work with than the County. Been working on this since 2017. Been looking at permitting and development process, trying to address it. Long time to change culture and process. Culture issue hard to change instantaneously.

- Clark County is one of the most dysfunctional public jurisdictions that we've worked with – starting from land use to building permit applications, permitting, and inspecting.” If this continues, Clark County will be on the list of geographies to avoid working with (along with City of Portland).

- There is a real culture problem at Clark County. Permeates both planning and engineering. Feels like a culture of no, and caution. Have had an extremely challenging time getting projects through planning, environmental review, engineering. Not open to discussing how to deliver projects with an open mind.

- Bureaucratic culture. There are a few individuals who do not try to help figure out if there is a different/better process to help. You are stuck navigating through their bureaucracy. Specifically, traffic engineering is very strict. In planning. A couple people stall that process. To your face, and cite chapter and verse when it comes time. As a person that walks in the door and asks for help – there really isn't a process to help navigate the bureaucracy because it's just based on bureaucracy. Not unrealistic. Have worked with sophisticated set of customers – know when to feign naivete... need help navigating through this process. Even when he thought he had the ear of someone, Snell” they had a network of decision / indecision that was tough to navigate. • Biggest frustration: the process by which you can build has become so departmentalized that it's hard to get through the process. Can't have a single stream going through it. You used to be able to submit for review concurrently, now have to go 1-by-1 basis. Not an all-in-one service. Clark County doesn't do any of their own electrical reviews. Done by the state. Create delays and complications. • Only done a couple projects in the last two years. We don't do a lot of work in

Clark County, but there's a reason for that. The permitting process was nightmare-ish. • A lot of projects have very strict requirements, times, deadlines, etc. Because the County process is so unfriendly, what has been frustrating is that even when we ask for their help, their stance is-we don't care-go to the end, even when the County has their own money in the project.

County needs to look at this effort around creating new housing opportunities through an equity lens. People should be able to live in areas they want to live in regardless of socio-economic class. Neighborhoods should be created with the amenities mentioned, location near schools, jobs, parks, and transit. Besides Hazel Dell, there are very few opportunities in the county. Low income individuals shouldn't be sentenced to Hazel Dell. Use an equity lens to ensure that diverse populations have access all parts of the community.

### **Community Framework Plan**

The Framework Plan generally establishes a vision of growth concentrated in urban growth areas and rural centers, including a mix of housing types at a range of densities and preserving rural areas with farms, forests, open space and large-lot residential. **CCCU notes: The Community Framework Plan, which was the basis for the Comprehensive Plan, is currently far removed from its original concepts and considerations. It has been morphed by the staff, into something that the people would not recognize. If one would go out into the public arena in the rural area, town and cities and ask them to compose a Framework Plan, it would look nothing like what is on the books today. Councilors must understand the suffering that the county population has endured because of all of this staff manipulation. This must stop.**

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