

From: [Sonja Wiser](#)
To: [Justin Wood](#); [Cnty 2025 Comp Plan](#)
Cc: [Jose Alvarez](#); [Oliver Orjiako](#); [Christine Cook](#); [Rebecca Messinger](#)
Subject: RE: CCAR Comment- Additional Survey Link
Date: Monday, May 6, 2024 6:46:00 AM
Attachments: [Revised CCAR Population Employment Allocation Comment 5.2.2024 .pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Good morning Justin; thank you for your comments regarding CCAR Population Employment Allocations. I will forward to staff and add to the Index of Record.

From: Justin Wood <ga@ccrealtors.com>
Sent: Friday, May 3, 2024 1:23 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: CCAR Comment- Additional Survey Link

EXTERNAL: 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.

Good Afternoon,

Please see the revised CCAR letter of comment with additional context and link for the single-family home preference figure referenced (83%). I have also included the link below. This additional context came to light after contacting DHM.

[New Research: King County Housing Perspectives Evolve with COVID-19 - Quinn Thomas](#)

Thank you!

Best Regards,

Justin Wood

AHWD,

Government Affairs Director



Office: 360.695.5980
Direct: 503.917.5698
www.ccrealtors.com
1514 Broadway, Ste 102, Vancouver WA 98663





Chair Gary Medvigy
County Council
PO Box 5000
Vancouver, WA 98666-5000

May 2, 2024

Re: Clark County Population and Employment Allocation

Dear Chair Medvigy, Clark County Councilors, County Manager, & Director of Community Planning;

As our community moves through the comprehensive plan update, our association would like to commend the council and the cities for taking additional time to deliberate on the population and employment allocation, devising a modified allocation methodology. This piece of the update is crucial to inform preferred land use alternatives for the county and cities going forward. Moreover, the HAPT tool and housing needs by income band will determine the zoning and therefore housing types Clark County must “plan and accommodate” for as outlined in HB 1220.

While the need for affordable housing, housing affordability, and workforce housing is undeniable in our community, our association has concerns that going forward we are not planning for adequate homeownership opportunities. Interest rates, cost of construction, and market dynamics will change, but if we don’t address the lack of inventory, housing prices in Clark County will continue to increase. When going through this update we need to ensure planning and accommodation for ownership opportunities and the zoning that product requires for the next 20 years.

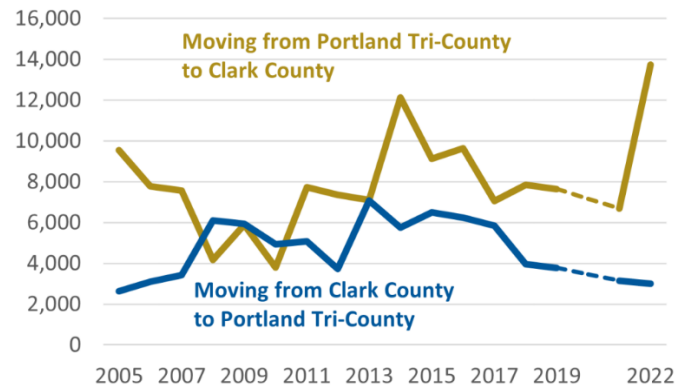
Currently, in the State of Washington, single-family homes, manufactured homes, and townhomes are the only viable new construction ownership products that the market will produce. The Washington Uniform Common Ownership Interest Act (WUCIOA) prevents developers from constructing condominiums, given the construction defect liability within the law. Condos are available in the State of Washington, but most new construction condominiums are luxury products, with large fund reserves set aside to deal with liability that may arise. CCAR has been at the forefront of condominium liability reform through DEAB (Development Engineering Advisory Board) and other community partners. We welcome collaboration with council and staff to institute reforms here locally and advocate for changes to WUCIOA at the legislature.

To underline our concerns regarding homeownership and inventory within the context of allocation, please reference the three points below.

1. High-income earners from the Portland tri-county area (Multnomah, Clackamas, and Washington Counties) are moving to Clark County at an accelerated pace. Please reference the figures below, and “Moving Across the River” a report by John Lehner with the Oregon Office of Economic Analysis: [Moving Across the River | Oregon Office of Economic Analysis \(oregoneconomicanalysis.com\)](https://oregoneconomicanalysis.com/moving-across-the-river/)

Moving Across the River

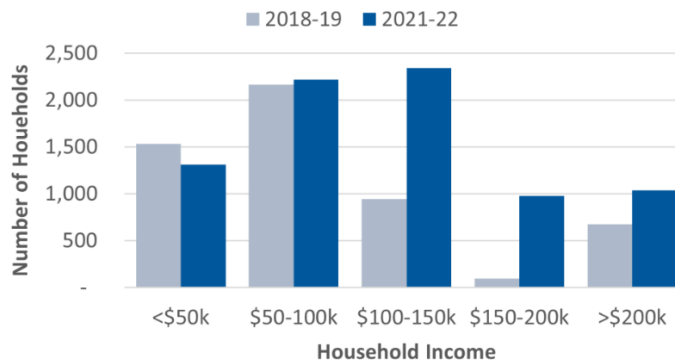
Number of people moving within the Portland metro area



Data: 2005-2022 ACS, 2020 data not published | Source: IPUMS-USA, Oregon Office of Econ Analysis

Moving Across the River

Number of households moving out of Clackamas, Multnomah, and Washington Counties and into Clark County



Data shown are 2 year totals, e.g. 2018-19 is the number of households moving in 2018 plus number moving in 2019
Data: ACS PUMS | Source: IPUMS-USA, Oregon Office of Economic Analysis

2. Americans still believe homeownership is a part of the American Dream. According to a recent survey from DHM Research, 74% of Washington residents from across the state think home ownership is a part of the American Dream (pg.11): [DHM-Panel-Washington-March-2024-Toplines.pdf \(dhmresearch.com\)](https://dhmresearch.com/dhm-panel-washington-march-2024-toplines.pdf)

Coupled with that, a separate survey from October 2021 conducted by DHM on behalf of communications firm Quinn Thomas- 83% of King County residents stated a single-family home was their preferred housing type. “The survey found that county residents overwhelmingly desire a single-family home, 83% choosing that as their preferred housing type”: [Survey shows most King County residents likely open to ditching single-family zoning | The Seattle Times](#) + [New Research: King County Housing Perspectives Evolve with COVID-19 - Quinn Thomas](#)

3. The HAPT planning tool from the Department of Commerce doesn't require counties to allocate units above 120% AMI. While the county has chosen to allocate units for incomes above 120% AMI it is important to note this planning guidance:

“The allocation numbers for >120% of AMI are shown with gray shading to remind the user that there are no requirements to allocate units for those above-moderate income housing needs. The tool shows these numbers to ensure that the sum of all income levels (including PSH) add up to the Total Permanent Housing Needs by Income Level.”: [HAPT FINAL 2023_0301.xlsx | Powered by Box](#)

Following this guidance would negatively impact the market. Higher-income buyers will “buy down” and take housing stock away from moderate-income and first-time home buyers. Given the data presented above, it is important the county plans for higher-income individuals moving to Clark County.

Again, we applaud the work and collaboration from the Clark County Council, Clark County Community Planning, Cities within Clark County, and County Management. We encourage consideration of the points above during the current allocation process and overarching comprehensive plan update.

Sincerely,

Justin Wood

Government Affairs Director, ga@ccrealtors.com

Clark County Association of REALTORS®

From: [Justin Wood](#)
To: [Cnty 2025 Comp Plan](#)
Cc: [Gary Medvigy](#); [Karen Bowerman](#); [Michelle Belkot](#); [Glen Yung](#); [Sue Marshall](#)
Subject: CCAR Comment- Population & Employment Allocation
Date: Thursday, May 2, 2024 4:16:10 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[CCAR Population Employment Allocation Comment 5.2.2024 .pdf](#)

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Good Afternoon,

Please accept this letter of comment addressed to the Clark County Council on behalf of CCAR, regarding the upcoming population and employment allocation public hearing slated for 5/7.

Thank you!

Justin Wood

AHWD,

Government Affairs Director



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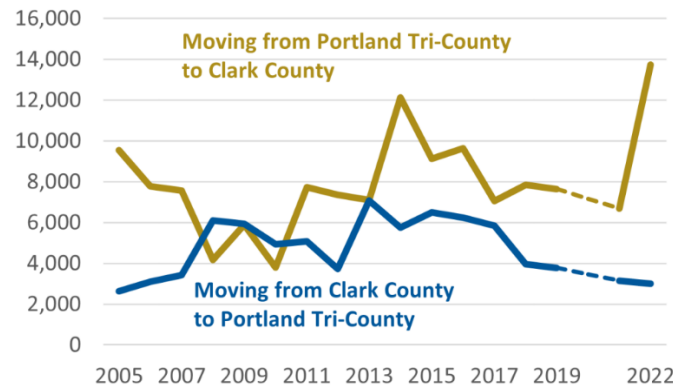
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Moving Across the River

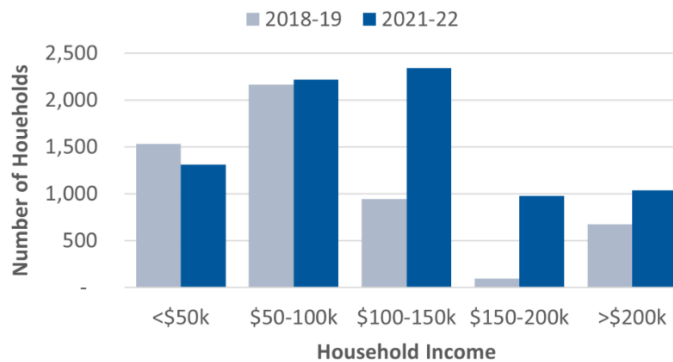
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