

November 21, 2024

RE: Proposed Affordable Housing Code Changes and implementation of Housing Options Study and Action Plan Strategy AH-1

Chair Karl Johnson and Clark County Planning Commission Members -

The Clark County Commission on Aging is pleased to have the opportunity to comment on the proposed amendments to allow eligible affordable multi-family housing with no commercial component in the Commercial and Mixed-Use zoning districts within the unincorporated Vancouver Urban Growth Area.

As you may be aware, the Commission on Aging is a nine-member volunteer group appointed by the Clark County Manager and supported by the Clark County Council. The Commission is authorized to endorse efforts that align with its mission, vision and guiding principles. The Commission envisions Clark County as a livable community for citizens of all ages and abilities, that are valued, engaged and respected.

To achieve this vision, as community ambassadors, the Commission on Aging provides leadership, advocacy, community awareness, and develops partnerships to initiate positive change toward an all-age friendly, livable community. Some of the key guiding principles for our work includes embracing the diversity of individuals, partners caregivers and stakeholders; promoting livability by encouraging and supporting accessible, safe environments, good nutrition and healthy living; and protecting and advocating for all vulnerable individuals.

The [Clark County Aging Readiness Plan](#) was written in 2012 and updated in 2023 to assess the county's readiness to serve as a home for a growing number of older residents. The plan is implemented by the Commission on Aging and includes strategies to improve the community's capacity to support its growing older population and ultimately benefit all ages. Recommendations within the [Aging Readiness Plan](#) focus on addressing inadequate or non-existent public infrastructure, support for social services, and zoning and planning standards that encourage age-friendly communities older adults can thrive in.

Commission members reviewed the proposed code amendments to the Commercial and Mixed-Use zoning districts in relation to the commission's mission, vision, guiding principles and Aging Readiness Plan strategies and found several areas of alignment. As outlined on page 50 of the Aging Readiness Plan,

"The growing need among older adults for safe, accessible, affordable housing must be accommodated by constructing a range of housing types at various prices. Currently, Clark County's housing stock is predominantly traditional low-density units (67%),

followed by apartments with five or more units (21%). Much of the low-density housing in Clark County is larger than most households need. ^{1,2}According to the U.S. Census Bureau, just over 70% of homes in the county have three or more bedrooms, while nearly 60% of households in Clark County are occupied by two or fewer people. Housing that is too large can sometimes lead to higher cost burden and maintenance issues for older adults.

In Clark County, renters are more likely to face cost burden than homeowners; half of people renting pay 30% or more of their income towards rent. In contrast, 27% of homeowners with a mortgage are cost burdened. Homelessness is another major housing issue facing Clark County residents. According to the Council for the Homeless, 1,197 people were experiencing homelessness as of February 24, 2022, in Clark County. This is a 31% increase since the beginning of 2020. Of these 1,197 people, 96 were adults aged 62 or older. This represents a 57% increase in the number of older adults experiencing homelessness over the same period.” (emphasis added)

Successful implementation of the proposed code modifications in the Commercial and Mixed-Use zones would be an important step toward addressing the need for affordable housing access for older adults in Clark County. Specifically, the code changes would help meet several plan goals and strategies through the provision of affordable housing that meets the federal low-income housing tax credit area median income requirements.

The proposed code amendments would directly implement the following [Aging Readiness Plan](#) (See page 63) goal and associated strategy:

- **Goal H-3: Support the development of more affordable housing**
 - **Strategy H-3.1: Promote higher density and mixed-use development of under-used properties. Amend the comprehensive plan and zoning designations and/or code to allow for higher densities and mixed uses on under-utilized properties.**

Other key areas of alignment with the [Aging Readiness Plan](#) (See page 54 and 58) include:

- Goal H-1: Provide a range of housing for multigenerational communities.
 - Strategy H-1.6: Remove barriers to the development of smaller dwellings, including ADUs.
- Goal H-2: Provide housing that enables people to age in place

As outlined in the [Aging Readiness Plan](#), stakeholders outlined concerns about rapidly rising housing costs for lower and middle-income households and voiced a need for controlling housing costs across stakeholders and strategies. Implementation of the strategy AH-1 of the Housing Options Study and Action Plan through the proposed code changes would assist in addressing these concerns and provide increased opportunities for locating affordable housing in Clark County.

¹ U.S. Census Bureau. 2021a. “Selected Housing Characteristics.” ACS 1-Year Estimates. Table DP04. <https://data.census.gov/table?q=units+in+structure&g=050XX00US53011>

² U.S. Census Bureau. 2021b. “Occupancy Characteristics.” ACS 1-Year Estimates. Table S2501. <https://data.census.gov/table?q=household+size&g=050XX00US53011>

Based on these alignments between the proposed code amendments and the Clark County Commission on Aging's mission, vision, guiding principles and the [Aging Readiness Plan](#), the Commission voted unanimously on November 20, 2024, to send this letter of support. Thank you for proposing this important project for the community.

Sincerely,

Franklin Johnson
Chair

The Clark County Commission on Aging provides leadership in community engagement and advocacy of Clark County's Aging Readiness Plan, especially for those 60 and over who plan to age in place.