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To: [Sue Marshall](#)
Cc: [Jeffrey Delapena](#)
Subject: Urgent Housing and Growth Concerns in Clark County
Date: Tuesday, March 25, 2025 2:46:51 PM
Attachments: [VUGA Res Comp Plan Math - 1 page - 11.5.2024.pdf](#)

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Dear Councilor Sue Marshall,

I am reaching out to express my deep concerns as both a **homeowner and business owner** in Clark County regarding the direction of the 2025 Comprehensive Plan Update. As a longtime resident of District 5 and an active member of the community, I am deeply invested in the future of our county. The way our community is growing—and the decisions being made—will have long-term consequences for families like mine and many others who are struggling to keep up with the rising cost of living.

As of 2024, Clark County's population reached 536,300, reflecting a growth of 33,000 residents since 2020—an average annual increase of 1.6%. To support this continued growth, our community must offer a diverse range of housing options. Historically, Clark County residents have had the opportunity to purchase homes locally; however, the current approach to the Comprehensive Plan would restrict housing inventory, increasing pressure on home values.

With input from local residential real estate experts, including myself, we have identified significant flaws in the county's housing capacity analysis, particularly concerning the Unincorporated Vancouver Urban Growth Area and the **critical need for a countywide resource lands study**.

- Before the 2025 Comprehensive Plan Update even began, the Unincorporated Vancouver Urban Growth Area (VUGA) already had a housing deficit of 2,571 units in 2020, per the county's Housing Options Study adopted in May 2022.
- Clark County's own data shows a need for 40,450 new dwelling units over the next 20 years, but only 16,945 new units can be accommodated under the current zoning—leaving a shortage of 23,496 units.
- Instead of expanding the Urban Growth Area (UGA) to realistically meet housing demand, the county is attempting to fit 40,450 units into land that can only support 16,954 units at the current density of 7.12 units per net acre.
- Instead of expanding the Urban Growth Area (UGA), Clark County Community Planning aims to **accommodate 40,450 dwelling units on land that their own model indicates can only support 16,954 units**. This would require **developing 2,381 net buildable acres at an average density of 7.12 units per acre—an 82% increase from the current density of 3.92 units per acre**.
- The latest upzoning proposal by Clark County Community Planning has 40,450

dwelling units on 2,381 net buildable acres, which amounts to around 17 units per net acre, an extreme jump that surpasses even recent zoning adjustments and fails to acknowledge the real-world impacts on affordability and ownership opportunities.

The Reality for Clark County Homeowners & Families

As a homeowner, I can tell you firsthand that between rising property taxes, insurance rates, inflation on utilities, maintenance costs, home repairs, healthcare, transportation costs and really just everyday living expenses, it is becoming nearly impossible to find opportunities to save or even get ahead. Many of us who once thought we made a good living are now questioning whether we can continue to call this area home. This has become an almost daily conversation in our household, not only causing us great concern but also deeply saddening us. We have worked incredibly hard for everything we have, and the thought of possibly having to leave it all behind simply due to affordability is heart-wrenching. As someone who truly cares for her community, I don't want this to become a reality for us, nor for others in our community either.

Beyond my own concerns, I am also a parent of a soon-to-be college graduate, and I worry deeply about their ability to afford housing—whether as a renter or, someday, as a hopeful homeowner. The dream of purchasing a home and building generational wealth seems further out of reach than ever, and it is extremely disheartening to watch as this once-attainable goal becomes an unlikely reality for so many young adults.

A Disconnect Between the People and Our Leadership

There seems to be a growing disconnect between what the community needs and wants, and the agenda of our policymakers. **Homeownership should not become a luxury.** The current comprehensive plan threatens to push single-family homes even further out of reach, funneling nearly all new housing into high-density options while failing to address the real challenges facing renters, first-time buyers, and longtime residents alike.

While an increase in density is necessary for affordability, it must be done strategically and realistically, not as an extreme shift that removes choice and limits homeownership opportunities. I urge you to advocate for policies that:

1. Provide a reasonable mix of detached and attached housing to maintain **affordability and homeownership opportunities.**
2. Expand the Urban Growth Area or reconsider zoning policies to realistically meet housing needs.
3. Ensure that upzoning efforts promote ownership opportunities, not just rental products.
4. Reevaluate **market factors** to identify and address barriers related to redevelopment, housing inventory, regulations, and financial conditions.

Clark County is at a crossroads. If we do not do better, I fear for the future of not just my family, but for an entire generation who may no longer see a path forward in this community. I strongly encourage you to listen to these concerns and take meaningful action before it is too late.

I would welcome the opportunity to discuss this further and look forward to your response.

Sincerely,

P.S. Please refer to the enclosed data table for additional context and detailed information regarding the recommendations.



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Key Population Growth Assumptions			
Clark County Total New Housing Needed	103,695.00	dwelling units, County PC Presentation 10/2024	
2045 HH allocation -unincorp VUGA +Rural	44,036.00	dwelling units, County PC Presentation 10/2024	
Share of County Total to VUGA+Rural	42%		
Rural Population Growth	9,538.00	From Issue Paper #5 - Clark County Community Planning	
Rural HH Growth (@ 2.66 PPH)	3,585.75	calculated	
Unincorporated VUGA HH Growth Target	40,450.25	dwelling units	
Existing Housing Deficit (housing options study)	2,571.00	dwelling units	
Needed Housing (VUGA, noncity)	43,021.25	dwelling units	

Key VBLM Residential Assumptions			
Market Factor	10.0%	residential, deduction on vacant unconstrained lands	
	30.0%	residential, deduction on vacant constrained lands	
Environmental Constraint	50.0%	residential, deduction on lands identified as environmentally constrained	
Assumed Density	16.4	Res Hi	
	5.7	Res Low	
	10.2	MX	

Residential VBLM Yield by VBLM Land Use (VUGA Unincorporated)

Land Use	Gross Acres	Critical Acres	Infrastructure Acres	Market Acres	Buildable Acres	Houses	VBLM People	Net density	PPH
Mixed Use	158	12	37	0	110	1,119	2,976	10.20	2.66
Urban High Res	540	86	111	87	257	4,206	11,189	16.40	2.66
Urban Low Res	4,621	752	881	973	2,015	11,629	30,933	5.77	2.66
Total	5,319	850	1,029	1,060	2,381	16,954	45,098	7.12	DU/net acre

% increase in net density over existing 3.92 units/acre avg **82%**

Note on units/acre: 7.12 is a net number, after excluded lands and all deductions.

Gross units/acre is likely closer to 50%-60% of 7.12, or ~3.92, existing observed density.

Res. Capacity Analysis (Unincorporated VUGA)

	Housing Units	Avg Density	Population
Capacity Using VBLM Assumptions	16,954	10.21	45,098
Growth Target (new dwellings)	40,450		
Difference between Capacity and Target	-23,496		-62,500
Housing Options Study Existing Deficit	-2,571		
Total Deficit	-26,067		-6,934

scenario	density	% future mix	
Res Hi	16.4	40%	6.56
Res Low	5.7	55%	3.14
MX	10.2	5%	0.51
Net Avg. Density		100%	10.21

Land Needs Scenarios (for -26,067 DU deficit)	Net Acres	Net Sq. Miles	Gross Acres	Gross Sq. Miles
Net New Acres Needed at 7.12 Avg Units/Acre	3,661	5.72	6,656	10.40
Net New Acres Needed at 16.4 Avg. Units/Acre	1,590	2.48	2,890	4.52
Net New Acres Needed at 10.21 Avg. Units/Acre	2,554	3.99	4,644	7.26

*Gross to net conversion assumes 45% of new land is not available in the gross to net conversion due to market factor, infrastructure, environmental constraint

Sensitivity Analysis (Evaluating Impact on Existing Capacity if Assumptions Change)

Existing Residential Capacity if Market Factor (market absorption over the 20-year planning horizon) changes:

	Total Acres	Buildable Acres	Households	Units/Acre	People	Absorption Capacity
County Avg. Market Factor	20%	2,976	2,381	16,954	7	45,098
Avg. Market Factor of 30%	30%	2,976	2,083	14,835		-12.50%
Avg. Market Factor of 40%	40%	2,976	1,786	12,716		-25.00%
Avg. Market Factor of 50%	50%	2,976	1,488	10,596		-37.50%

Existing Residential Capacity if MX Land only yields 50% of forecast

Existing Forecast New HH on MX	1,118.90	
50% Realization	559.45	
Reduction in available housing	559.45	3.30% Reduction in total available housing capacity

Population Capacity reduction from 2.66 to 2.5 Persons/Household

6.40% Reduction in population carrying capacity of housing capacity

Housing Capacity if Existing Deficit is removed from available inventory

Existing Available Inventory Forecast	16,954.10	
Housing Deficit from Housing Options Study	2,571.00	15.16% Reduction in capacity to absorb future HH growth

Total potential reduction from sensitivity changes	-37.36%	
Existing Forecast HH	16,954.10	
Reductions from sensitivity changes	(6,334.77)	Sq. Miles
Net New Acres Needed at 10.2 units/net acre	2,283.22	3.57
Net New Gross Acres needed*	4,566.45	7.14

*Assumes 50% gross to net conversion (=50% unavailable)