

June 2, 2025

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

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN UPDATE

Re:

- **WHY WASN'T THIS ADDRESSED IN BUILDABLE LAND REPORTS AND ANY HOUSING ANALYSIS?**
- **This critical data was left out. This leaves the accuracy of entire analytic reports in doubt.**

Dear Councilors and Community Development

On behalf of the membership of Clark County Citizens United, Inc., please consider the following testimony on the updated Clark County Comprehensive Plan. Many of these issues are repeated concerns testified to in the last comprehensive growth plan update. Please take them seriously.

- We ask that you have a discussion of how subsidized housing raises the costs of housing in Clark County's market.
- There is an emphasis on multi-family housing units that is wishful thinking. Look at the type of housing people are asking for, not what county planners are *allowing* them to get. Families still want single family homes with yards.
- The GMA requires an honest housing analysis that includes an inventory and analysis of existing and *projected housing* needs for all people; that means urban and rural. That includes housing goals, policies, objectives and mandatory provisions for . . . "development of housing, including single-family residences."

The only analysis to be found comparing existing housing with future rural growth needs suggests that rural allocated growth will be moved and reallocated to UGA population capacities.

- We suggest the Council compare the supply of single family rural dwellings and rural buildable parcels with projected rural population growth. You should have been given reports on rural land capacity analysis.
- The rural projected housing needs have repeatedly failed to meet historical rural population allocations. It's critical to explore this and ask why this repeated failure is allowed. This indicates POLICY FAILURES.

It appears Clark County UGA's are able to accommodate both the numbers of allocated urban and rural populations and types of dwellings needed over the next planning period. **THAT'S NOT ACCOMMODATING RURAL GROWTH - - - IT'S SIMPLY DISPLACING RURAL FAMILIES AND MOVING SPECIFIED HOUSING NEEDS PROJECTIONS, (adopted in policy), TO UNSPECIFIED UGA'S.**

- The elected Board of Councilors has nothing showing how well existing rural housing serves the current rural population, let alone actual analysis whether rural population needs will be met through this planning period.

There is no data on comparison to citizen's housing preferences.

- Is staff able to tell the Council Clark County families will be able to buy the single-family homes they want and can afford?

CCCU has submitted much testimony in the record that rural buildable parcels fall short. Additionally, accuracy for rural buildable parcels needs to be questioned. What may be "buildable" rural land is largely impacted by Critical Area concerns and under recorded Conservation Covenants on Deeds to untold parcels of private land. The Covenants make it very difficult and costly to use private land let alone get a building permit for a home.

- **WHY WASN'T THIS ADDRESSED IN BUILDABLE LAND REPORTS AND ANY HOUSING ANALYSIS?**
- **This critical data was left out. This leaves the accuracy of entire analytic reports in doubt.**

Historical Buildable Lands Reports reveal an alarming collision with rural population projected growth and insufficient numbers of buildable parcels. Even though enacted policies over the years have supported 20-10% rural population allocations, the number of buildable rural parcels have been inadequate and have been failing to meet housing needs stated in public policies for the urban/rural population allocations. Missteps are common practice and public policy failures regarding housing for rural Clark County families are very complex. Public policy failures should not be routine.

The county's Comprehensive Growth Plan needs to be based on up-to-date, factual information that at least includes market preferences and trends for housing that accommodates all people. . .urban and rural. Without this guidance, the entire comp plan process is pointless. The citizens demand the elected officials have access to practical, effective and true data to enable the best decisions over the next 20 years.

Sincerely,

Susan Rasmussen, President

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604