

From: [Jeffrey Delapena](#)
To: [Cnty 2025 Comp Plan](#); [Phil Wuest](#)
Cc: [Jose Alvarez](#); [Oliver Orjiako](#); [Jenna Kay](#)
Subject: FW: Comprehensive Plan: DEIS Comment
Date: Friday, November 21, 2025 1:33:27 PM
Attachments: [image001.png](#)
[Housing Policy - DEIS Comment 11.21.2025.pdf](#)
[Written Testimony - December 4, 2024 - DEIS Alternatives and Housing Impacts.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
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Good day, Phil,

Thank you for this feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded your comments to Staff and will enter these into the Index of Record.



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Phil Wuest <phil@ginngrp.com>
Sent: Friday, November 21, 2025 12:06 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>
Subject: Comprehensive Plan: DEIS Comment

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Good afternoon,

Please find my DEIS comments attached here. Today's comment, dated 11.21.2025, follows the comments I submitted on December 4, 2024, a copy of which is also attached here for reference and should be incorporated with today's DEIS comment letter.

Thank you,

Phil Wuest | President

phil@ginngrp.com 360-768-5032

Licensed to practice law in Washington and Oregon



Clark County Comprehensive Plan
Draft Environmental Impact Statement Comment

To: Clark County Planning Commission and Board of County Councilors
From: Phil Wuest, Ginn Group, 502 NE 72nd St., Vancouver, WA 98665
Date: November 21, 2025
Re: Critical Deficiencies in Housing Element DEIS & Capital Facilities Analysis

The Draft Environmental Impact Statement (DEIS) for Clark County's comprehensive plan update contains at least one fundamental flaw: it assumes multifamily housing development will address affordability without demonstrating the financial capacity to subsidize such housing at the scale required. Based on empirical data from Clark County's own affordable housing programs, creating genuinely affordable housing requires public subsidies of \$75,000 to \$125,000 per unit minimum.¹

The County's proposal to accommodate 82,000 new households by 2045, with heavy emphasis on multifamily development presumed to be "affordable," would require \$2.25 to \$3.75 billion in public subsidy for even 30,000 affordable units. The Capital Facilities Plan demonstrates no capacity to fund subsidies at this scale. This disconnect between planning assumptions and fiscal reality renders the housing element legally insufficient under the Growth Management Act.

The Fallacy of "Multifamily Equals Affordable"

The proposed comprehensive plan and DEIS conflates multifamily housing production with affordability yet provides little to no supporting evidence. Market data directly contradicts this assumption.

- New multifamily construction in Clark County (2022-2024): 78% of units are luxury rentals priced above median
- Average new apartment rent (2024): \$2,150/month, requiring \$86,000 annual household income
- Filtering timeline: New units take 15+ years to approach median affordability levels
- Net affordability impact: Population growth (1.8% annually) outpaces filtering benefits

Without substantial public subsidy, new multifamily construction serves primarily higher-income households, exacerbating rather than solving affordability challenges. Analysis of Clark County's actual affordable housing projects reveals consistent subsidy patterns:

City of Vancouver Affordable Housing Fund (AHF):

- 50% AMI units: \$75,000 per unit subsidy cap
- 30% AMI units: \$105,000 per unit subsidy cap
- Actual average awards: \$34,000 per unit (leveraging other sources)

¹ Note that this subsidy deficiency only addresses the housing unit construction itself. The DEIS also fails to account for and explain how existing urban infrastructure including roads, electric, sanitary sewer, water and storm sewer will all be upgraded and upsized in place to serve dramatically higher development densities than were assumed when all of the existing infrastructure was constructed. Is there a budget for that, or is the County simply assuming failing levels of service for all required utilities?

Case Study - Waterfront Gateway Project:

- Total cost: \$474,000 per unit (95 units)
- Public subsidy required: >\$250,000 per unit combined (local, state, federal)
- Affordability achieved only through layered public financing

Statewide Data:

- Washington Housing Trust Fund: \$40,000-60,000 state contribution per unit
- Total public subsidy (all sources): \$200,000-300,000 per unit typical
- Subsidy represents 65-85% of total development costs

If Clark County intends even 30,000 of its planned 82,000 new units to be affordable at 80% AMI or below:

- Conservative Estimate: 30,000 units × \$75,000 minimum subsidy = \$2.25 billion
- Realistic Estimate: 30,000 units × \$125,000 typical subsidy = \$3.75 billion

Current Capacity for Public Subsidy:

- Vancouver AHF: \$10 million annually = 100-130 units/year
- County new revenues: \$7-8 million annually = 70-100 units/year
- Total annual capacity: 170-230 affordable units
- 20-year production at current funding: 3,400-4,600 units

The gap between need (30,000+ affordable units) and funded capacity (4,600 units maximum) exceeds 25,000 units, representing an unfunded mandate of \$1.9 to \$3.1 billion.

Legal Insufficiency Under GMA

The Growth Management Act, RCW 36.70A.070(2), requires housing elements to include:

1. An inventory and analysis of existing and projected housing needs
2. A statement of goals and policies for preservation and production of housing
3. Identification of sufficient land capacity
4. Adequate provisions for existing and projected needs

The DEIS fails requirement #4 by assuming affordability without demonstrating funding capacity. The Capital Facilities Plan (CFP) must show how infrastructure—including affordable housing subsidies—will be financed (RCW 36.70A.070(3)).

Because the DEIS fails requirement #4, it also automatically fails #3 because the County's housing strategy is based almost exclusively on new housing on existing UGA lands at multifamily densities of 18 or more units per acre. If the funding leg of that strategy is broken, it follows that the land supply leg is also legally deficient.

The Growth Management Hearings Board has consistently ruled that:

- Plans must be "internally consistent" between elements
- Housing elements must demonstrate realistic capacity to meet identified needs
- Capital facilities planning must align with housing production goals

The current DEIS's assumption that multifamily zoning alone creates affordability, without corresponding CFP funding commitments, fails this consistency test.

Market Dynamics Ignored by DEIS

The DEIS fails to acknowledge how housing segments interact. When ownership opportunities are constrained:

- Higher-income households remain in rental markets longer
- Increased competition drives up rents across all segments
- Lower-income renters face displacement

Clark County data (2019-2024):

- Entry-level homes (<\$450,000) declined from 34% to 11% of sales
- Result: 52% increase in 2-bedroom apartment rents
- Affordable housing waitlists grew from 1,200 to 4,100 households

The DEIS ignores how multifamily-focused strategies attract institutional capital.

- Institutional investors now control 23% of Clark County single-family rentals
- Build-to-rent communities target high-income renters exclusively
- Corporate ownership reduces long-term affordability through profit maximization

A Balanced Alternative Framework

Rather than the DEIS's multifamily-centric approach, Clark County should adopt balanced housing supply targets.

Ownership Opportunities (40% of new units):

- Large-lot single family 5%
- Small-lot single-family: 20%
- Townhomes/condos: 10%
- Manufactured housing: 5%

Missing Middle (30% of new units):

- Duplexes/triplexes/fourplexes: 15-20%
- Cottage clusters: 5-10%
- Accessory dwelling units: 3-5%

Multifamily Rentals (30% of new units):

- Market-rate apartments: 20%
- Subsidized affordable: 10% (with demonstrated funding)

Supporting Policies Required

- Density bonuses tied to affordability commitments
- Identify sufficient land for a healthy mix of housing product types across the entire housing typology spectrum
- Regulate environmental constraints differently inside and outside the Urban Growth Boundary, allowing increased use of environmental engineering tools and methods to insure clean water
- Land value capture mechanisms for infrastructure investment
- Revised approach to roads and utilities allowing more flexibility/lower cost/unit
- Reduced or scaled SDC/impact/development fees based on the size of unit and/or target demographic.
- First-time buyer assistance programs at scale

Conclusion

The current DEIS fundamentally misrepresents the relationship between housing type and affordability. Without acknowledging the massive public subsidies required to create affordable multifamily housing—and without demonstrating the fiscal capacity to provide such subsidies—the plan fails to meet Growth Management Act requirements.

Clark County faces a choice: either dramatically expand public funding for affordable housing subsidies or adopt a more balanced approach that leverages market-rate production across all housing types while targeting limited subsidies strategically. The current proposal, which assumes multifamily development alone will solve affordability without requisite funding, is neither legally sufficient nor practically achievable.

The County must revise its housing element to either:

- Demonstrate funding capacity for the subsidies required to make multifamily housing genuinely affordable, or
- Adopt a balanced housing production strategy that creates affordability through diverse housing types and ownership opportunities

Failure to address this fundamental disconnect between assumptions and fiscal reality will result in continued affordability crisis, increased displacement, and potential legal challenges to the comprehensive plan's adequacy.

Submitted respectfully with the intent to strengthen Clark County's housing strategy for genuine, sustainable affordability and a healthy, thriving community.

From: [Phil Wuest](#)
To: [Gary Medvigy](#); [Bowerman, Karen \(Clark County\)](#); [Glen Yung](#); [Sue Marshall](#); michelle.belkot@clark.wa.gov
Subject: Written Testimony - December 6, 2025 - DEIS Alternatives and Housing Impacts
Date: Wednesday, December 4, 2024 10:01:47 PM
Attachments: [Outlook-Ginn Group.png](#)

Honorable Councilors-

I strongly urge you to consider at least one additional alternative for DEIS analysis for the unincorporated Vancouver UGA than is proposed by staff, one that evaluates several large areas for potential boundary expansion. Simply evaluating an option in the DEIS does not mean the boundary must expand, it simply leaves the County Council some room to make policy choices next year before the Final Environmental Impact Statement is prepared prior to plan adoption.

Please consider that the last major urban growth boundary expansion was in 2007, when the combined county urban growth areas were expanded by around 17 square miles, mostly for residential development. Here we are 18 years later, having experienced robust growth since 2007, and the proposal this time is for no boundary expansion at all for additional residential land for the next 20 years. This is at a time when Clark County has an acknowledged existing deficit of 2500 dwelling units (see Clark County's own Housing Options Study), and housing affordability is at an historic low.

Please also consider that the County's Vacant and Buildable Lands Model (flawed as it is, but that ship has apparently sailed) from June of 2023 indicates that the unincorporated Vancouver UGA can only accommodate approximately 16,500 new dwelling units. Now, faced with the task of accommodating over 40,000 new dwelling units in the unincorporated Vancouver UGA (more than twice the potential capacity identified in the County's own 2023 base VBLM model), the Council is presented with the radical proposition that all new growth can be handled with mere assumptions of increased density (22 units/acre) on all existing low-density residential land and up-zoning (increased densities) of 24, 35, 45 and more units/acre everywhere else. For reference, 22 units per acre can be achieved with 14' wide 3-story townhomes, but not traditional 18'-20' wide townhomes. Many of Clark County's garden style apartment projects (3-story walk-ups, with parking at around 1.8 spaces/unit) are developed at 22 units/acre.

The DEIS alternative being proposed for consideration that includes no expansion of the unincorporated Vancouver UGA represents an alarmingly radical change to character to Clark County. Please try to imagine what this new landscape will look like, what it will feel like, and how it will impact the existing residents, and the new residents we hope to welcome to our community in the next 20 years.

Staff will tell you that this outcome is mandated by the State of Washington, and the County has no choice but to assume that all new housing growth should be in extremely dense townhomes and apartments to meet the State's mandatory affordable housing targets. The proposal before the Council is certainly one way to meet the state's mandates, but it is not the only way. In the proposal before you, the County fails to consider the role of expanding the supply of all housing types, and for the County's existing housing stock to filter through housing market to provide a large portion of the housing needed for those new residents earning 80% or less of the area median income. Rather than considering existing housing stock in that equation, the proposal before you assumes that very large portion of new housing

built over the next 20 years must be affordable. I hope it comes as no surprise to the Council that the only way new housing can be affordable (because it's so expensive to build new) is to subsidize the cost of new construction for affordable units. At an average cost of \$300,000/unit for all new construction, subsidizing 20,000 housing units at 50% of the cost of the unit in the unincorporated Vancouver UGA would cost Three Billion Dollars (20,000 dwellings x \$150,000/dwelling). That is a radical departure from how housing is traditionally financed and is a pretty fantastical plan.

Even if achievable, the plan proposed to the Council does not address in the least the impacts to the very community the plan is supposed to serve.

Please, please consider evaluating one or two additional options in the DEIS so that next year you have options to decide on the best approach to accommodate growth in a manner that best serves and suits Clark County. Limiting the alternatives studied in the DEIS will tie the Council's hands next year, essentially forcing adoption of the plan that assumes a radical increase in density to all existing and new neighborhoods in Clark County.

Thank you for your consideration of these comments.

Phil Wuest

Phil Wuest | President

phil@ginngrp.com 360-768-5032

Licensed to practice law in Washington and Oregon



Building Something More