

**From:** [Jeffrey Delapena](#)  
**To:** [Justin Wood](#); [Cnty 2025 Comp Plan](#)  
**Cc:** [Jenna Kay](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Subject:** FW: Clark County Association of REALTORS® DEIS Letter of Comment  
**Date:** Monday, December 1, 2025 8:54:58 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
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[CCAR 2025 Clark County DEIS Letter of Comment .pdf](#)  
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[image012.png](#)

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Good day, Justin,

Thank you for submitting CCAR's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

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



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

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**From:** Justin Wood <ga@ccrealtors.com>  
**Sent:** Thursday, November 27, 2025 12:12 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>  
**Cc:** Jenna Kay <Jenna.Kay@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>  
**Subject:** Clark County Association of REALTORS® DEIS Letter of Comment

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Clark County Council & Clark County Community Planning,

On behalf of the Clark County Association of REALTORS® (CCAR), please accept this letter of comment regarding the Draft Environmental Impact Statement(DEIS) and associated land use alternatives as a part of the Comprehensive Plan Update.

Our association appreciates the opportunity to provide input on this matter.

Best Regards,

*Justin T. Wood*

AHWD,

Government Affairs Director



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1514 Broadway, Ste 102, Vancouver WA 98663





Sue Marshall, Chair  
Clark County Council  
1300 Franklin Street  
Vancouver, WA 98660

November 27, 2025

Dear Chair Marshall and Fellow Members of the Clark County Council:

First and foremost, we have the utmost gratitude for the work you and county staff are doing regarding the comprehensive plan update. The decisions made now will determine whether Clark County remains a place where people can build stable lives, raise families, and participate in the community for decades to come.

The Clark County Association of REALTORS® (CCAR) appreciates the opportunity to provide continued input regarding the comprehensive plan update and the recently released draft environmental impact statement (DEIS). The land use alternative that this council selects will have significant implications for housing and employment in Clark County over the next 20 years.

CCAR's members are well-positioned to understand housing affordability, availability, and market dynamics here in Clark County. With over 1,900 REALTORS®, property managers, inspectors, contractors, developers, mortgage brokers, and title professionals, encompassing our membership, we urge you to consider our perspective. We cannot understate the importance of local control within Washington State's Growth Management Act. Clark County is the fastest-growing urbanized county in Washington State. Our community must have a comprehensive plan to meet our growing needs. To do that, we recommend that this council adopt land use alternative three. This option will provide the greatest flexibility, capacity, and respect for jurisdictions' autonomy to accommodate Clark County's bright future.

#### Why More Capacity Matters Now

From 2020-2025 Clark County has added an average of **7,817 new residents each year**. This has created housing affordability challenges; average rents are now higher in Vancouver than in Portland. The Portland Metro Chamber's [2025 State of the Economy Report](#) gives our community great insight into who is moving to Clark County. In 2022, the average income of individuals moving to Clark County was \$105,800. These new residents have drastically raised the median income in Clark County. From 2020-2023, the area median income in the county has risen 23%.

Given the county's adopted housing allocation, 31% of new housing units over the next 20 years will need to cater to incomes above 120% of area median income. However, in land use alternatives one and two, there is little to no UGA expansion dedicated to low-density housing, including single-family homes.

This lack of land will compound existing supply and demand issues. Per the county's own DEIS, between 2020 and 2024, the median home price in Clark County went up over 40 percent, from \$403,700 to \$568,600. If our community doesn't build enough housing for this demographic, consumers will buy what is available, leading to bidding wars, and fewer, if any, options for middle and lower-income residents to buy a home in Clark County. Building housing types with the zoning to match to cater to this demographic, serves as a pressure relief valve for a tight housing market. While the real estate market has slowed in Clark County in recent years, we still suffer from an undersupply of inventory at 3.6 months. A change in mortgage rates or the economy may spur housing activity similar to 2021 & 2022, without the supply ready to absorb that demand.

This story shows up in real ways:

- A family that grew up here gets outbid repeatedly.
- A young professional accepts a job but cannot find a home.
- Local employers cite housing availability as a barrier to growth.

These outcomes are not the result of one policy choice — they reflect a system struggling to keep pace.

While middle housing policy will produce more homeownership opportunities, the obstacles of condominium development in Washington State constrain much-needed ownership housing. Given current code and law, the most viable homeownership opportunities will come from cottage clusters, townhomes, and single-family home development. Depending on existing capacity, middle housing infill, and upzoning, will not produce the scale of production and pricing that is typically advertised with middle housing product. To underline this point, according to Portland's Residential Infill Project (RIP) Progress Report, the average closing price for a middle housing unit in Portland Oregon, was **\$614,223** in 2024. We must pull all the levers available to us to address the housing crisis, including targeted Urban Growth Area (UGA) expansion **alongside** middle housing infill.

### Planning Assumptions & Density

All the way back in 2022, the council adopted planning assumptions that were used to inform the Vacant Buildable Lands Model (VBLM). These assumptions included deductions for infrastructure, critical areas, and market factor. All of these elements are crucial to understanding what land is truly buildable or has the potential to redevelop. While these assumptions have already been selected, these assumptions will create "shadow inventory", property that seems developable based on the assumptions, but in reality, will not convert into either more housing or employment centers within the 20-year cycle. The idea that 50% of constrained (critical) land will develop, given the Department of Ecology's increasing wetland and habitat mitigation requirements, is unrealistic. Industry experts and our own research show that 25%-30% of constrained (critical) land will develop. Moreover, the assumption that 70% of underused residential inventory will redevelop by 2045 is also unrealistic. The cost of demolition continues to increase, and a stormwater permit and best management practices are now required for demolition projects per the newly updated stormwater manual. From 2021- 2024 Portland's Residential Infill Project (RIP) saw no increase in demolitions, which points to middle housing developers favoring vacant land in a big way. Assuming 70% of underused residential property will be redeveloped, paints our community into a corner if that redevelopment doesn't occur at the rate assumed.

Density is a useful tool that can create more housing and reduce vehicle miles traveled, however, it can't be the only tool we use to grow our community. For the past two years, multifamily permits have slowed significantly, podium-style apartment construction is costly, coupled with higher interest rates,

make many of these projects infeasible. These factors, coupled with Clark County and the City of Vancouver moving to increase their minimum densities in multifamily zones, paint a worrying picture. Accommodating zoning that will produce housing for lower-income bands is laudable, but it is an unfunded mandate. Waiting for the highest and best use of a given parcel may delay housing development and further compound the housing crisis we face. Providing the zoning and land for “what works” now will be far more effective than waiting for denser housing types that may never come to fruition within the 20-year cycle. Advocating for strategic UGA expansion and investigation of site-specific requests is not advocating for urban sprawl.

### A Practical Path Forward

The overwhelming majority of consumers would like to own a single-family home. According to a 2021 survey from DHM & Quinn Thomas, 83% of King County residents prefer to live in a single family home. This council has the opportunity to increase the capacity to build more single-family and middle housing. This capacity will be essential over the coming years, as at least 31% of new residents will demand these housing types. Having a viable housing market is important for economic development;

Businesses need attainable housing for their workforce. And a healthy housing ecosystem requires:

- infill and middle housing,
- higher-density multifamily where it pencils, and respects existing communities and residents.
- enough land for single-family, townhome, and cottage-style housing that can be built now.

Alternative Three acknowledges the market as it is — not as we hope it might be. It provides the County with the tools to meet housing needs at the scale that growth demands, rather than relying on upzoning and redevelopment, policy choices that may not translate into additional housing for our community.

Homeownership creates stakeholders in communities across Clark County, establishing roots, starting businesses, and a stable tax base. According to research from the National Association of REALTORS® (NAR), the median age of a new homebuyer is now 40 years old. To turn the tide, we need flexibility and capacity, not restrictions and minimums. If the planning assumptions within this update don't pan out, the consequences for the housing market will be dire. Welcoming new residents and providing the housing needed will not destroy our community; it will build it up. **We need your help! The built environment will be here for decades, if not, centuries to come. To ensure adequate future homeownership opportunities to match our growing community, we must pull all the levers available to us to increase housing supply. We need infill middle housing development, targeted UGA expansion, and higher-density multifamily to meet our needs. The Clark County Association of REALTORS® urges this body to adopt alternative three as the preferred land use alternative for the 2025 Comprehensive Plan Update.**

Clark County's future will be shaped by what we do today. By adopting alternative three, the Council makes a practical, balanced choice that aligns with both data and lived experience. Thank you for your consideration and for your service to the community.

Sincerely,

*Justin Wood*

Government Affairs Director

Sources:

- [Office of Financial Management\(OFM\) April 1 Population Growth Estimates](#)
- [Portland Metro Chamber's 2025 State of the Economy Report](#)
- [Portland Residential Infill Project \(RIP\) Progress Report 2018-2024](#)
- [Clark County's Draft Environmental Impact Statement \(DEIS\).](#)
- [DHM & Quinn Thomas King County Housing Preference Survey, 2021](#)