

From: [Jeffrey Delapena](#)
To: [JOHN KARPINSKI](#); [Cnty 2025 Comp Plan](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)
Subject: RE: Comment on Clark County's DEIS on its Comprehensive GMA plans
Date: Monday, December 1, 2025 11:33:09 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, John,

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

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



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From: JOHN KARPINSKI <karpjd@comcast.net>
Sent: Sunday, November 30, 2025 2:52 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; JOHN KARPINSKI <karpjd@comcast.net>
Subject: Comment on Clark County's DEIS on its Comprehensive GMA plans

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To: Oliver Orjiako, Director, Clark County Community Planning and SEPA
Responsible Official

Thank you for the opportunity to comment on Clark County's DEIS on its Comprehensive Growth Management Plans to comply with the Growth Management Act 10-year periodic review requirements.

I) County projects person/housing density to decline despite State required density increases to reflect the implementation of HB 1110.

A) HB 1110 encourages and allows turning existing single family homes into apartments

HB 1110 is a sea change in allowed uses of existing single family homes. They can now legally be turned into apartments and what used to be boarding homes.....dramatically increasing density all within existing buildings.

HB 1110 Section 3 ¶

1. Except as provided in subsection (4) of this section, any city that is required or chooses to plan under RCW 36.70A.040 must provide by ordinance and incorporate into its development regulations, zoning regulations, and other official controls, authorization for the following:
 - a. For cities with a population of at least 25,000 but less than 75,000 based on office of financial management population estimates:
 - i. The development of at least two units per lot on all lots zoned predominantly for residential use, unless zoning permitting higher densities or intensities applies;
 - ii. The development of at least four units per lot on all lots zoned predominantly for residential use, unless zoning permitting

higher densities or intensities applies, within one-quarter mile walking distance of a major transit stop; and

iii. The development of at least four units per lot on all lots zoned predominantly for residential use, unless zoning permitting higher densities or intensities applies, if at least one unit is affordable housing.

b. For cities with a population of at least 75,000 based on office of financial management population estimates:

i. The development of at least four units per lot on all lots zoned predominantly for residential use, unless zoning permitting higher densities or intensities applies;

ii. The development of at least six units per lot on all lots zoned predominantly for residential use, unless zoning permitting higher densities or intensities applies, within one-quarter mile walking distance of a major transit stop; and

iii. The development of at least six units per lot on all lots zoned predominantly for residential use, unless zoning permitting higher densities or intensities applies, if at least two units are affordable housing.

c. For cities with a population of less than 25,000, that are within a contiguous urban growth area with the largest city in a county with a population of more than 275,000, based on office of financial management population estimates the development of at least two units per lot on all lots zoned predominantly for residential use, unless zoning permitting higher densities or intensities applies.

B) The cheapest and most effective method to create affordable housing is room rental in existing houses.

- The City of Bellingham is launching a new program aimed at helping homeowners fill empty bedrooms in their homes while also providing renters with increased access to housing options. The “home sharing” program will provide “much needed long-term housing options to the community
- See <https://www.bellinghamherald.com/news/politics-government/article308445100.html>

The state of Oregon is also proposing room rental incentive program

As stated in "Tackling Oregon's housing crisis: Bill would provide incentives for homeowners renting rooms long-term"

- The scale of the shortage makes it difficult for even aggressive solutions to produce quick improvements; it will take a long time to build the hundreds of thousands of housing units Oregon will need to not only make up for the existing shortfall but stay ahead of future population growth.
- But there is one creative approach that can produce additional housing much faster, and without having to build anything at all: home sharing. in which existing homeowners rent out their unused rooms to tenants in search of affordable housing. <https://www.kgw.com/article/entertainment/television/programs/straight-talk/oregon-housing-crisis-home-sharing/283-40ceb1be-1b1c-435e-b902-dbbfe592ad08>

C) Inexplicably, despite this change, the DEIS projects that the County will have less people/home, instead of more.

The DEIS at page 1 projects the County to have 2.44 persons/house. The 2004 plan used 2.69, and the staff here recommended 2.67. *Oliver Orjako September 20, 2023 SUBJECT: DRAFT Issue Paper 4: Planning Assumptions page 4.*

Yet the County adopted 2.44 people/home, based on the HAPT

"The persons per household (PPH) number used by the HAPT assumes a much smaller PPH figure than what Clark County has used historically, or what is reflected in the latest census data....The HAPT assumes a six percent vacancy rate which would yield 6% more housing units than households. The vacancy rate based on the 2020 census data is 4%. In previous planning efforts the county has not used a vacancy rate as a factor but has used a market factor ranging from 0 to 25% to increase the residential supply of land. The

*VBLM includes market factors
(never to convert factor) to account for market conditions.*

The PPH # is wrong, and is largely redundant with the "market factor" the County uses in it's VBLA. Therefore, the County should reduce or eliminate the market factor to cure the error.

II The DEIS fails to include/require implementing and mitigating measures to create long term affordable housing.

The DEIS does not include an inventory of current affordable housing or implementing measures for their preservation. Also, the new "affordable housing" created is temporary... not required to be preserved as affordable housing. For example, the City of Vancouver gives tax credits for creating affordable housing for only 10 years. The affordable housing portion of the DEIS and HB 1100 require more.

Thanks again for the opportunity to comment. Sorry I could not provide more detailed comments.

John Karpinski

John Karpinski

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