

**From:** [Jeffrey Delapena](#)  
**To:** [IHarkins@biaofclarkcounty.org](mailto:IHarkins@biaofclarkcounty.org); [Cnty 2025 Comp Plan](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** FW: BIA Additional Comp Plan Comments RE VBLM Density Yields  
**Date:** Monday, December 1, 2025 2:40:55 PM  
**Attachments:** [image001.png](#)  
[Housing Yield Anaysis Cover Letter.pdf](#)  
[Clark County Hsq Capacity Analysis 11\\_26\\_25.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Good day, Ian,

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

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



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

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**From:** Ian Harkins <[IHarkins@biaofclarkcounty.org](mailto:IHarkins@biaofclarkcounty.org)>  
**Sent:** Sunday, November 30, 2025 8:42 AM  
**To:** Cnty 2025 Comp Plan <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>  
**Subject:** BIA Additional Comp Plan Comments RE VBLM Density Yields

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attachments unless you recognize the sender and know the content is safe.

Good Morning,

Please see the attached cover letter and study showing achieved density yields since the VBLM was adopted. Please enter the documents into the record together.

Thank you!

**Ian Harkins | Government Affairs Coordinator**  
**BIA of Clark County - a Top 30 NAHB Association**  
*Protecting and promoting the building industry.*

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Clark County Council  
1300 Franklin Street  
Vancouver, WA 98660

**RE: Submission of Technical Memo Regarding Development Yield Assumptions**

Dear Councilors,

On behalf of the Building Industry Association of Clark County (BIA), we respectfully submit the attached memorandum for inclusion in the public record related to the Comprehensive Plan update process.

This memo provides technical analysis demonstrating that the County's current development yield assumptions significantly overstate realistic housing capacity. As outlined in the document, these assumptions do not align with on-the-ground feasibility and development patterns. As a result, the County's projected yields may materially inflate achievable housing outcomes.

Given the central role these assumptions play in future land use, housing supply planning, and growth management decisions, we respectfully request that the County review and revise its yield computations accordingly. Ensuring accurate assumptions is essential to meeting state housing requirements, supporting attainable housing opportunities, and planning responsibly for long-term population growth.

We appreciate the County's continued work on the Comprehensive Plan and value the opportunity to participate constructively in this process. The BIA remains committed to collaboration and stands ready to provide additional data, peer review, or field-based expertise as needed.

Thank you for your consideration, and please confirm that this correspondence and the attached memo have been entered into the public record.

Sincerely,

Ian Harkins  
Government Affairs Coordinator  
Building Industry Association of Clark County

Attachment: Technical Memo – Development Yield Assumptions



November 26, 2025

To: Building Industry Association of Clark County

From: Johnson Economics

SUBJECT: Housing Yield Analysis – VBLM vs. Actual in Vancouver UGA

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## HOUSING YIELD ANALYSIS

### A. INTRODUCTION

JOHNSON ECONOMICS was retained to analyze the yield of recent housing subdivision development within the Vancouver UGA, including incorporated and unincorporated areas. The analysis compared the assumed housing density by zone in the latest Clark County Vacant Buildable Land Model (VBLM) completed in 2023, compared to the actual housing density achieved by subdivision development in those zones since 2020.

The analysis used the following assumptions, and utilized data from the Clark County Open Data Hub:

- Subdivisions within the Vancouver UGA, including incorporated and unincorporated areas, built since 2020
- Land is zoned for Higher Density Residential or Mixed Use
- Short plats of 7 to 9 units were included; Short plats of fewer units excluded
- Acreage was determined using mixture of underlying taxlot data, or GIS estimation
- In subdivisions with mixed zoning, the relevant HDR or Mixed Use portion was analyzed

The purpose of this analysis was to determine what buildable residential lands within the relevant zones yielded in terms of housing unit density, compared to the planned yield based on VBLM density assumptions.

### B. FINDINGS

The analysis identified 28 developments meeting the above criteria recorded since 2020 (Table 1). 12 of these were in incorporated Vancouver, and 16 within the unincorporated Vancouver UGA. The developments totaled 124 acres.



- The average density across the identified developments was less than 12 units/acre, compared to the average assumed density of 17.6 units/acre for these parcels in the VBLM.
- This indicates that actual achieved yield of these lands was 68% of what would be expected using the VBLM density assumption.
- There were 1,474 actual units or lots in these developments vs. the 2,178 units that the VBLM density assumption predicted.
- The discrepancy between the actual and planned capacity was larger in incorporated Vancouver, with the developments averaging 55% of the unit yield assumed under the zoning in the VBLM.
- In unincorporated areas, the actual unit yield was 78% of the unit yield assumed under the zoning in the VBLM.
- In general, the analysis of recent subdivision development activity within the Vancouver UGA indicates that the achieved housing yield of most developments is significantly lower than the assumed yield within those zones in the VBLM. This indicates that the VBLM is likely over-estimating the capacity of remaining buildable lands in these zones.



**TABLE 1: IDENTIFIED SUBDIVISION HOUSING DEVELOPMENT, VANCOUVER UGA (2020 – 2025)  
ASSUMED HOUSING UNIT YIELD (VBLM) VS. ACTUAL HOUSING UNIT YIELD**

BOOK PAGE ID	Subdivision	Subdiv ID	Type	Incorp Status	Jurisdiction	Zoning	Acres	VBLM Density (Units/Acre)	Planned Units (VBLM)	Actual Density (Units/Acre)	Actual Units	Actual Density/VBLM Density	
312079	FOUR SEASONS TERRACE	5966445	Plat	Incorporated	Vancouver	R-18	1.9	17.6	33	9.5	18	54%	
312103	GREEN MEADOWS VILLAGE	5966461	Plat	Incorporated	Vancouver	R-18/R-30	2.5	23.8	59	14.4	36	61%	
312108	5TH PLAIN CREEK STATION PH 1	5966588	Plat	Incorporated	Vancouver	R-18	10.1	17.6	178	11.5	116	65%	
312135	5TH PLAIN CREEK STATION PH2	5966673	Plat	Incorporated	Vancouver	R-18	10	17.6	176	9.9	99	56%	
312136	FOUR SEASONS NORTH PLANNED DEVELOPMENT	5966467	Plat	Incorporated	Vancouver	R-22	8.9	25.5	227	12.8	114	50%	
312137	AMENDED FOUR SEASONS SOUTH PUD (C)	5966704	Plat	Incorporated	Vancouver	R-22	4.6	25.5	117	8.9	41	35%	
312142	GROVE AT 58TH	5966587	Plat	Incorporated	Vancouver	R-18	2.9	17.6	51	13.4	39	76%	
312183	LINCOLN WOODS	5966579	Plat	Incorporated	Vancouver	R-18	1.9	17.6	33	12.6	24	72%	
312266	PARKHOUSE VISTA	5966888	Plat	Incorporated	Vancouver	R-22	1.25	25.5	32	16.0	20	63%	
312286	PARKSTONE HEIGHTS	5966807	Plat	Incorporated	Vancouver	R-18	1.35	17.6	24	13.3	18	76%	
4-338	U STREET TOWNHOMES SP	5966748	Short Plat	Incorporated	Vancouver	R-30	0.35	30.1	11	22.9	8	76%	
4-436	FIRCREST SHORT PLAT	5967059	Short Plat	Incorporated	Vancouver	R-22	1.4	25.5	36	6.4	9	25%	
312081	HAZEL DELL LANDING	5966529	Plat	Unincorporated	County	R43 HDR	5.4	24	130	14.6	79	61%	
312110	ORCHARDS TOWNHOMES	5966586	Plat	Unincorporated	County	R30 HDR	2.17	22.0	48	16.1	35	73%	
312139	ALPINE VILLAGE (HDR Portion)	5966612	Plat	Unincorporated	County	R18 HDR	1.8	18.0	32	11.7	21	65%	
312140	TENNY CREEK PH 2	5966624	Plat	Unincorporated	County	R30 HDR	4.5	22	99	10.9	49	49%	
312175	MELBOURNE ESTATES	5966756	Plat	Unincorporated	County	R30 HDR	3	22.0	66	14.0	42	64%	
312177	COURTYARDS AT HIDDEN CREST	5966729	Plat	Unincorporated	County	R30 HDR	6.7	22	147	11.3	76	52%	
312188	LEGACY VILLAGE	5966778	Plat	Unincorporated	County	OR-30	2.1	22.0	46	14.8	31	67%	
312206	GOLDFINCH LANE	5966789	Plat	Unincorporated	County	R18 HDR	1.8	18.0	32	12.8	23	71%	
312251	VILLAGIO (MU Portion)	5966871	Plat	Unincorporated	County	MX	12.3	18	221	13.0	160	72%	
312293	MANZURA TOWNHOMES	5967034	Plat	Unincorporated	County	R30 HDR	1.05	22.0	23	20.0	20	91%	
312352	99TH STREET (HDR Portion)	5966959	Plat	Unincorporated	County	R18 HDR	3.8	18.0	68	10.5	40	58%	
312355	ARVON TOWNHOMES	5967040	Plat	Unincorporated	County	MX	0.75	18	14	12.0	9	67%	
312367	137TH PLACE	5967193	Plat	Unincorporated	County	R18 HDR	0.64	18.0	12	15.6	10	87%	
312230; 312233; 312233	NORTH HAVEN PUD (3 Phases)	5966820	Plat	Unincorporated	County	R12 HDR	29.5	8.0	236	10.9	321	136%	
4-382	NE 114TH STREET TOWNHOMES SP	5967007	Short Plat	Unincorporated	County	R30 HDR	0.45	22.0	10	20.0	9	91%	
4-426	MADISON PARK SP	5966766	Short Plat	Unincorporated	County	R18 HDR	0.9	18.0	16	7.8	7	43%	
<b>TOTALS:</b>							<b>28</b>	<b>124.0</b>	<b>17.6</b>	<b>2,178</b>	<b>11.9</b>	<b>1,474</b>	<b>68%</b>
<b>Incorporated</b>							<b>12</b>	<b>47.2</b>	<b>20.7</b>	<b>977</b>	<b>11.5</b>	<b>542</b>	<b>55%</b>
<b>Unincorporated</b>							<b>16</b>	<b>76.9</b>	<b>15.6</b>	<b>1,201</b>	<b>12.1</b>	<b>932</b>	<b>78%</b>

Sources: Clark County Open Data Hub, VBLM 2023 Capacity and Yield Summary, Clark County Assessor, Johnson Economics