From:	Jeffrey Delapena
To:	Ian Harkins; Cnty 2025 Comp Plan; Jeffrey Delapena
Cc:	Noelle Lovern; Oliver Orjiako; Jose Alvarez
Subject:	RE: VBLM Density Analysis Study
Date:	Tuesday, December 16, 2025 3:23:31 PM
Attachments:	image001.png Clark County Hsg Capacity Analysis 12_9_25.pdf image002.png image003.png image004.png image005.png

Good day, Ian,

Thank you for your submitting this public comment related to the 2025 Comprehensive Plan Update.

I have forwarded this information to members of Staff and they will be entered into the Index of Record.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

From: Ian Harkins <IHarkins@biaofclarkcounty.org>
Sent: Tuesday, December 16, 2025 2:55 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Noelle Lovern <Noelle@biaofclarkcounty.org>
Subject: VBLM Density Analysis Study

Good Afternoon,

The attached document is the full study that corresponds with the executive summary recently provided by the Building Industry Association of Clark County (BIA). Please enter it into the comprehensive plan record. We encourage the Planning team and County Councilors to review the complete study as part of their decision-making process, as it provides the full methodology, data, and analysis underlying the summarized findings. We believe this data is key for understanding some of the flaws with the VBLM.

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

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JOHNSON ECONOMICS

December 8, 2025

To: Building Industry Association of Clark County
From: Johnson Economics

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

HOUSING YIELD ANALYSIS

A. INTRODUCTION

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

The VLBM is a planning tool used to identify the residential and employment capacity of vacant or underutilized land within the UGAs of the cities in Clark County. The model includes an inventory these lands and an estimate of the amount of future growth capacity (housing units and jobs) that these lands might accommodate in the future. The model is used to help in growth management planning for the county and the cities.

The VBLM is designed to help the county meet the requirements of the Washington Growth Management Act and has been used for multiple decades to track the county's inventory of buildable land and estimated housing and jobs capacity on that land. The Comprehensive Planning process which is underway for the 2025-2045 period uses population forecasts provided by the state and capacity estimates from the VBLM to allocate forecasted growth to the local UGA's and unincorporated Clark County. Local jurisdictions provide density estimates for each zone in the city's UGA.

The analysis discussed in this memo finds that in Higher Density Residential or Mixed Use zones in the Vancouver UGA, nearly all subdivision plats approved since 2020 have achieved a lower housing density than the density assumed in the VBLM, both as individual developments and in aggregate. In aggregate, the subdivisions analyzed achieved 68% of the housing unit density assumed in the relevant zones in the VBLM.

This suggests that the VBLM is overestimating the future capacity of inventoried land, by assuming that achieved density will be higher than what is being seen in practice.

B. METHODOLOGY

This analysis focused on Higher Density Residential (HDR) or Mixed Use (MX) zones in the Vancouver UGA. Study-area zones within incorporated Vancouver have city zoning (ranging from R-18 to R-22), and zones of study in unincorporated Clark County, but within the UGA, have corresponding county Comprehensive Plan designations and zoning (ranging from R-12 HDR to R-43 HDR, and MX and OR-30).

The Clark County VBLM applies an assumed housing density for each zone. Each jurisdiction provides yield assumptions for the zoning designations under their purview. Table 1 shows the relevant high density residential and mixed use zones used in this analysis, and the assumed housing yield (i.e. density) applied by the model to determine the capacity of buildable land identified in those zones.

TABLE 1: HIGHER DENSITY AND MIXED USE ZONES, INCORPORATED AND UNINCORPORATED VANCOUVER UGA

Jurisdiction	Incorp Status	Zoning		VBLM Density Assumption (Hsg. Units/ Buildable Acre)
Vancouver	Incorporated	R-18	Higher-Density Residential District	17.6
Vancouver	Incorporated	R-22	Higher-Density Residential District	25.5
Vancouver	Incorporated	R-30	Higher-Density Residential District	30.1
County	Unincorporated	R-12 MDR	Urban Medium Density *	8.0
County	Unincorporated	R-18 MDR	Urban Medium Density *	18.0
County	Unincorporated	R-30 HDR	Urban High Density	22.0
County	Unincorporated	R-43 HDR	Urban High Density	24
County	Unincorporated	MX	Mixed Use	18
County	Unincorporated	OR-30 (Office Residential)	Urban High Density	22.0

Sources: City of Vancouver Municipal Code, Clark County Code, 2023 VLBM documentation

* The County R-18 zone is considered an "Urban Medium Density" zone under the Comprehensive Plan. It is included here because it the equivalent of the Vancouver's R-18 zone, which is considered a high density zone. One parcel with R-12 zoning was included[1].

The zones included are assumed to have housing capacity at a range of densities from 18 to 30 units per buildable acre. (One parcel in the County R-12 zone was included; see footnote.)

Data Sources and Assumptions: The analysis relied on data from the Clark County Open Data Hub, which provides GIS mapping data of relevant inputs including the VBLM, Comp Plan designations and Zoning,

[1] The North Haven PUD (321 units) is located in the R-12 zone (density of 8 units/acre). It was included here because it is a large recent development on land partially included in the VBLM. The development achieved greater density than the underlying VBLM assumption (11 units/acre actual vs. 8 units/acre assumed). It is included here for completeness. The fact that the density exceeds the VBLM assumption makes it a conservative inclusion for the sake of this analysis, as this is the opposite of the pattern seen at other developments.

Subdivisions, and jurisdictional boundaries. In some cases, information on specific developments was cross-checked with information from the Clark County Assessor.

The analysis used the following assumptions:

- Subdivisions within the Vancouver UGA, including incorporated and unincorporated areas, built since 2020, with data through November 2025.
- Land is zoned for Higher Density Residential or Mixed Use. (See footnote to Table 1.)
- Short plats of 7 to 9 units were included; Short plats of fewer units were excluded.
- Acreage was determined using a mixture of underlying taxlot data, assessor data, or GIS estimation.
- In subdivisions with mixed zoning, the relevant HDR or Mixed Use portion was analyzed, and the portion in a low-density or other non-relevant zone was excluded.
- The unit count in each subdivision was manually confirmed, as the Subdivisions GIS layer counts non-residential parcels such as right-of-way, open space, or remnant parcels in its unit count.

Methodology: 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.

Recent subdivisions were individually inventoried for lot count, whether built or buildable. A total of 28 developments, approved since 2020 were identified within the UGA, after the removal of short plats of less than seven units, projects in low density zones, and a few projects with incomplete or unreliable data that make an accurate comparison impossible.

The net density of the subdivisions was calculated, discounting acreage used for internal public right-of-way in cases where it applied. This allowed the closest comparison of net buildable land in the subdivisions to the definition of buildable land used in the VBLM methodology. Subdivisions were identified using GIS data, and calculations were done manually, as no single data source provides accurate unit count or net acreage.

The number of lots (built and buildable) was divided by the net acreage to determine the actual achieved housing density of each subdivision. This was compared to the planned density assumed in the VBLM for the relevant zone.

JOHNSON ECONOMICS

TABLE 2: 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 DEVEL	5966467	Plat	Incorporated	Vancouver	R-22	8.9	25.5	227	12.8	114	50%
312137	AMENDED FOUR SEASONS SOUTH PUD (	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%
TOTALS:		***28***					***124.0***	***17.6***	***2,178***	***11.9***	***1,474***	***68%***
Incorporated		***12***					***47.2***	***20.7***	***977***	***11.5***	***542***	***55%***
Unincorporated		***16***					***76.9***	***15.6***	***1,201***	***12.1***	***932***	***78%***

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

C. FINDINGS

Table 2 presents the results of the analysis. Twenty-eight developments were identified meeting the above criteria recorded since 2020. Twelve of these are located in incorporated Vancouver, and 16 within the unincorporated Vancouver UGA. The developments totaled 124 acres.

- The average density achieved 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. Those assumptions were provided by the City of Vancouver under HB 1220.
- In unincorporated areas, the actual unit yield was 78% of the unit yield assumed under the zoning in the VBLM, meaning that development in unincorporated came closer to achieving the planned density but still underperformed.
- 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 results are likely over-estimating the capacity of remaining buildable lands in these zones.
- The 2023 VBLM estimated capacity for over 71,000 housing units in Vancouver UGA, making up 75% of the remaining residential land capacity in Clark County (within the UGAs of all cities). Of the 71k unit capacity, 31k of the units (44%) were estimated to be High Density Residential housing.

TABLE 3: VANCOUVER UGA HOUSING UNIT CAPACITY, VBLM 2023

	High Density Residential	Low Density Residential	TOTAL Housing Units
Vancouver (Incorporated)	24,333	7,393	31,726
Vancouver UGA (Unincorp.)	6,814	32,524	39,338
TOTAL	*31,147*	*39,917*	*71,064*

Sources: Clark County, 2023 VLBM documentation

- Notably, most of the remaining HDR capacity is estimated to be in incorporated Vancouver. However, this analysis found that this is where the achieved density of the subdivision development was significantly lower than the planned density in the VBLM. The achieved density in incorporated Vancouver HDR and MU subdivisions was 55% of planned density. This carries through to the unincorporated UGA as well at 78% of planned capacity.
- The total estimated capacity in the Vancouver UGA for HDR housing (31k units) is 33% of the *total housing capacity* found across the county (94,200 units), including both HDR and LDR housing. Therefore, an overestimation of the remaining capacity for HDR units in Vancouver has implications for the overall findings of the VBLM.
- A simple exercise of multiplying the estimated VBLM capacity within the Vancouver UGA by the actual yield figures found in this study (55% incorporated, 78% unincorporated) would imply an actual yield of 18.7k HDR units, down from the 31K estimated in the VBLM – a reduction of nearly 40% or 12.5k units less capacity than estimated. (This methodology is simplistic but is provided as an example to demonstrate the potential order of magnitude impact of not achieving planned density.)
- The findings of this analysis suggest that the estimated capacity of remaining residential lands within the Vancouver UGA are likely overestimated in the most recent VBLM. This can lead to insufficient figures used in the comprehensive planning process and give a false impression of how much growth the current UGA can accommodate.