

**From:** [Cnty 2025 Comp Plan](#)  
**To:** [Clark County Citizens United, Inc.](#); [Cnty 2025 Comp Plan](#); [Oliver Orjiako](#); [Jeffrey Delapena](#); [Jose Alvarez](#)  
**Subject:** RE: HB 1220; Must include antidisplacement policies for rural populations in Comprehensive Plans  
**Date:** Monday, February 2, 2026 8:09:02 AM  
**Attachments:** [image001.png](#)  
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[image003.png](#)  
[image004.png](#)

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Good day, Susan,

Thank you for submitting this feedback in relation to the 2025 Comprehensive Plan Update.

This will be entered into the Index of Record.

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

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**From:** Clark County Citizens United, Inc. <cccuinc@yahoo.com>  
**Sent:** Friday, January 30, 2026 8:06 PM  
**To:** Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>  
**Subject:** HB 1220; Must include antidisplacement policies for rural populations in Comprehensive Plans

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Clark County Council  
30, 2026  
Clark County Community Development  
P.O.Box 5000  
Vancouver, Washington 98666

January

FOR THE PUBLIC RECORD

**HB 1220; Must include anti-displacement policies for rural populations in Comprehensive Plans**

Dear Councilors and Staff,

Clark County Citizens United, Inc. notes that the **2007 Amended Buildable Lands Report** reveals the rural areas will be depleted of buildable parcels looming in the 2024 planning horizon. This report indicates the rural people will be subjected to a housing crisis and put at a higher risk for displacement if actions are not taken. The county Officials were confronted with choices that needed to be made to prevent housing risks directly poised to impact rural families. Their choices were;

1. Allow the obsolete 1994 Rural and Resource large lot zoning laws to remain in place, (status quo remains) and force existing and projected rural populations into urban areas to find housing.  
This action would result in cultural disruptions, displacements and cause the collapse of projected rural population growth.
2. Avoid cultural and social displacements and increase the number of buildable rural parcels necessary to meet the present and projected rural housing demands according to anticipated growth of rural communities in Clark County.

The first scenario places untold social and cultural burdens on Clark County's rural families and forces them to migrate out of their familiar communities in search of affordable housing.

That housing is located in hyper dense urban areas and is not culturally relevant and suitable to rural needs.

The second option should have forced Clark County to come to terms with the Poyfair Remand and make the necessary changes in the large lot zoning laws to accommodate the projected

housing needs of rural families.

The county cannot go to zero rural population growth. The Poyfair ruling and the Court of Appeals ruled that is illegal. Under the Growth Management Act, (GMA) RCW 36.70A, it states in its housing mandate that rural housing must be planned for and affordable housing provided. It was a hypothetical statement made in the 1997 ruling that is now being lived by rural families in 2026. This is discriminatory and places untold burdens on one particular culture and community.

Unfortunately, the county chose option #1. This event in county planning forced rural families to make life-altering, cultural adjustments. For whatever reasons the county had, which drove this decision to displace rural families. The reasons do not outweigh the human need for housing relevant to their culture.

Now, the GMA contains the requirements of **House Bill 1220 and addresses anti-displacement policies and affordability for all.**

According to Commerce;

*Local housing element to:*

- *Conduct an **inventory and analysis of all housing needs** - to include housing needs by income, PSH and emergency housing*
- ***Identify sufficient capacity of land** for identified housing needs*
- ***Make adequate provisions for all housing needs**, including "document barriers to housing availability such as gaps in local funding, development regulations, etc."*
- *Identify **local policies and regulations that result in racially disparate impacts, displacement, and exclusion** in housing and **undo them***
- ***Identify areas at higher risk of displacement and establish anti-displacement policies.***

**HB 1220** includes particular language regarding anti displacement and includes the rural element;

- (g) Identifies areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investment; and
- (h) Establishes anti- displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land

disposition policies; . . .

Identify and remove barriers (Adequate Provisions)

**RCW 36.70A.070(2)(d):** *"Makes adequate provisions for **existing and projected needs of all economic segments of the community** including:*

- *(ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as **development regulations, and other limitations;***

Clearly, the GMA requires counties to plan for and accommodate housing needs , including those for projected populations of rural families. There is more emphasis on housing affordability and the need for a variety of housing types to meet diverse needs of all different income levels.

The public participation element of GMA is also relevant. The GMA requires public participation in the planning process to ensure that the needs of all, including those of rural families, are considered and implemented.

The Clark County Council can't ignore the law and the rural population. But to date, there is nothing in the proposed 2025-2026 Comprehensive Plan to accommodate the housing and cultural needs of the rural people. There is nothing in the proposed Comprehensive Plan to accommodate HB 1220 and RCW 36.70A.070(2)(d). There is nothing in the proposed Comprehensive Plan that prevents discrimination and displacement of the rural people. This is not allowed under the Growth Management Act.

Sincerely,

Susan Rasmussen, President

Clark County Citizens United, Inc.  
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