

From: [Cnty 2025 Comp Plan](#)
To: [Justin Wood](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: FW: Support Land Use Alternative Two- Clark County Association of REALTORS®
Date: Friday, April 24, 2026 1:38:00 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[CCAR Clark County Comp Plan Letter of Comment- Land Use Alt. Two 4.24.2026.pdf](#)
[image002.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image008.png](#)

Good day, Justin,

Thank you for providing CCAR's comments regarding the Council Hearing to select the Preferred Alternative for the 2025 Comprehensive Plan.

I have included additional staff for awareness. This will also be added to the Comprehensive Plan Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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From: Justin Wood <ga@ccrealtors.com>
Sent: Friday, April 24, 2026 1:33 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little

<Matt.Little@clark.wa.gov>

Cc: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>

Subject: Support Land Use Alternative Two- Clark County Association of REALTORS®

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Chair Marshall, Vice Chair Yung, and Councilors Little, Fuentes, and Belkot

Please accept this letter of comment, advocating for the adoption of land use alternative two as a part of the comprehensive plan update. Our association stands ready as a resource as you make these important decisions for our community.

Best Regards,

Justin T. Wood

AHWD,

Government Affairs Director



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Chair Marshall, Vice Chair Yung, and Councilors Little, Fuentes, and Belkot:

Our association urges this council to adopt land use alternative two and permit targeted de-designation of agricultural land, coupled with a commitment to establish a Transfer of Development Rights (TDR) program. This approach balances the urgent need for more buildable land to accommodate growth with the county's long-term goal of protecting productive farmland.

Throughout this comprehensive plan update, our association has raised concerns about land availability, the vacant buildable lands model, and new zones being established within the Vancouver Urban Growth Area (VUGA). While this plan allocates ample capacity for rental housing and greater density, we have concerns that there won't be enough capacity for owner-occupied housing. For example, the R-22 zone in most, if not all cases, precludes horizontal owner-occupied development for townhomes and single-family homes.

Depending on the low-density code changes made as a part of the county's Housing Options Study Action Plan (HOSAP) may not provide enough capacity for the owner-occupied market. A market cohort that will represent at least over 30% of the county's future growth over the next 20 years, according to community planning's own housing unit allocation mapping to comply with House Bill 1220. If Clark County doesn't provide enough land capacity for the 31% of new residents who will make at or above 120% area median income, then owner-occupied housing prices will skyrocket due to demand, and the opportunity to own a home in this county will drift further and further away for both new and existing residents. Land use alternative two moves our community closer to providing enough capacity for owner-occupied housing, and respects the autonomy of cities in Clark County.

Why alternative two is the right choice

- Responds to growth pressures. Clark County and its cities are experiencing sustained population and job growth that requires additional buildable land for housing, employment, and services. Alternative two provides a pragmatic path to increase supply while directing development to appropriate locations.

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- Respects municipal autonomy. Cities in Clark County must retain the ability to plan and zone within their jurisdictions. Alternative two and a county-led TDR program supported by interlocal agreements, protect local decision-making, and foster coordination between the county and cities, rather than imposing a one-size-fits-all solution.
- Protects farmland through market mechanisms. Coupling de-designation with a TDR program creates a mechanism to compensate landowners, concentrate development where infrastructure exists, and preserve high-value farmland elsewhere.

Within the context of the Growth Management Act (GMA), de-designation should be done on its own merits, independent of other programs or priorities. Our association agrees with the position the City of Ridgefield has taken on this matter.

De-designate much-needed buildable land close to current urban growth boundaries, have the county apply an urban holding zone designation on the newly de-designated land, and then independently- during, or, potentially after the comprehensive plan update, establish a TDR program and interlocal agreements with cities to facilitate it. Once complete and TDR credits secured, lift the urban holding and eventually annex those areas.

This will create the most defensible avenue for this council and our community within the context of the comprehensive plan update. While we understand the concerns of the agricultural commission, outright denying de-designation during a crucial time when it is supposed to occur may paint many communities into a corner regarding the availability of housing and employment land, compound existing affordability issues, and hamper the economic growth our community has seen.

Taking the time to establish a TDR program is essential and will allow our community to prioritize preservation of the most productive and contiguous farmland; monitoring and reporting on farmland loss; and ensure that TDR revenues or other mitigation funds support agricultural conservation and farm viability programs.

Choosing this option also ensures cities retain authority to accept receiving area designations and to implement zoning changes consistent with their comprehensive plans. Requiring agreements that clarify roles, responsibilities, and revenue sharing where appropriate. All of these things take time, and the county can apply the proper protections

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in the interim (urban holding zone) to alleviate concerns from all stakeholders in the process.

Our association appreciates all the work the county has done to balance growth, affordability, and livability, and we urge you to adopt land use alternative two now to produce housing and employment opportunities, while preserving long-term planning goals for the future. Our association and its 1,900+ members are available to discuss our position and these points further, if requested.

Sincerely,

Justin Wood

**Government Affairs Director,
Clark County Association of REALTORS®**