

From: [Jeffrey Delapena](#)
To: ["Clark County Citizens United, Inc."](#); [Cnty 2025 Comp Plan](#); [Jose Alvarez](#); [Oliver Orjiako](#); [Bart Catching](#)
Subject: RE: A glaring housing crisis is being proposed in the Clark County Comprehensive Plan
Date: Friday, May 22, 2026 9:25:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

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

564.397.4558



From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Thursday, May 21, 2026 6:35 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; Peter Silliman <Peter.Silliman@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>
Subject: A glaring housing crisis is being proposed in the Clark County Comprehensive Plan

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May 21, 2026

Clark County Community Planning
Clark County Council
Clark County Planning Commission
P.O. Box 5000
Vancouver, Washington 98666

FOR THE PUBLIC RECORD OF THE CLARK COUNTY COMPREHENSIVE
PLAN

**Re: A glaring housing crisis is being proposed in the Clark County
Comprehensive Plan**

Dear Councilors, Planners and Commissioners,

I've spent the better part of 30 years talking to elected officials about inadequate supplies of buildable rural parcels. These parcels are required to meet current and future rural housing demands. Over decades now, I have had to repeat the same conversation. I know rural generations, including rural Veterans, are wanting to return and establish homes where they were raised. Why can't Clark County make the numbers work? Why can't rural families have housing relevant to their culture?

A glaring gap exists — between what makes numeric sense and the comprehensive growth plans repeated failures to support rural housing.

Right now, the rural areas of the county are under the most sustained housing stress in GMA county planning history. The gap — is not just an economic inconvenience. It has lingered long enough to affect the long-term viability of Clark County Rural Communities, Rural Culture and creates instabilities for Rural Clark County Families. The rural areas are not approaching a housing crisis. . . *we have been living it!* This is causing displacement that fails to be recognized in county comprehensive growth plans.

Yet, the tools and policies that could help alleviate the crisis and help the county growth plans *adapt* to fit rural needs, have done nothing. Instead, Rural families, including rural Veterans, are the ones being forced to *change and adapt their lives* to accommodate the only type of housing that is available --- URBAN HOUSING.

Rural families are being forced to swap one culture and adapt their lifestyle to another. This decision, this policy has been replicated 30 + years, across many alternative growth plans presented by county officials. Rural housing is stressed and that burdens families. Replicated across the region that is already in an affordability crisis, and the impacts compound dramatically. *No one is so negatively burdened as rural families.*

Instead of going to work to fix the underlying causes, status quo is maintained. Reports are intentionally built to serve a preconceived agenda to maintain large lot zoning and promote an ill-conceived notion that more resource land is needed.

- There are no official Growth Management Act policies to oppress housing for rural families.
- There are no official Growth Management Act policies to make rural housing unaffordable.
- There are no official Growth Management Act policies to make rural parcels scarce.
- There are no official Growth Management Act policies to swap out rural housing for urban.
- There are no official Growth Management Act policies calling to displace rural families, including Veterans, and require them to move to urban communities.

So why, after 32 years of hard evidence, are rural families merely a footnote in Clark County planning? The answer is clearly a systemic failure.

The infrastructure of planners and policy makers repeatedly trade off rural housing and advance increased urban densities, multifamily units, no yards, no parking, no garages. Families and Veterans that want to maintain living in a rural culture often must settle for what is available and often cannot afford what is. Often, this requires them to make life-altering changes. This should prompt the county to require Social and Cultural Impact Statements right along side Environmental Impact Statements. The county fails such social analysis.

The housing needs of rural communities is not easily verified; the supply numbers are mostly inaccurate and there is no accountability for numbers. Rural families are left geographically scattered, fragmented, and burdened with excessive regulatory actions if they are able to build on a parcel. The county offers little technical support that is needed to succeed in their home building permitting efforts. Rural permitting processes have become over-burdened with excessive reports, increased fees and permanent conservation covenants.

The county is allowing thousands of people to be culturally squeezed out of housing. They are not recognizing rural housing as a staple for this culture. That framing of a community of people has limited their housing market development, suppressed parcels of land, suppressed investment, and kept this community invisible to the planners and elected officials. It also inhibits

the use of Veterans and their ability to make full use of the GI Bill on their preferred housing.

The means to fix this exists. Intelligence, equitable and ethical housing policies can connect rural families to culturally appropriate housing that is Growth Management Act required. Begin with the will to change obsolete, illegal policies and regulations that have placed excessive limitations on rural housing. Begin with the will, and new policies that shape how rural families see what's possible for their affordable housing needs.

The legal infrastructure has always been there. It is known as the Poyfair Remand. The question is whether the county will remove the cap on rural growth, build the system to support the housing rural families need, before any more are displaced.

1999 Washington State Court of Appeals Division II - CCCU vs CCNRC Decision

Morgan, J.

. . . The court ruled that the GMA did not require the County to use OFM's population projections as a fixed cap on non-urban growth, and that the Board had exceeded its authority by creating and imposing such a cap on the County.

The Superior Court said in part:

. . . There is no requirement in the GMA that the OFM projections be used in any manner other than as a measure to ensure urban growth areas are adequately sized and infrastructure in those areas is provided for. The Board's requirement to, in essence, require a vacant buildable lands analysis for the rural areas was erroneous. This Board decision, however, compelled the County to downzone substantial portions of the rural areas in order to meet the Board's apparent requirements

Clerk's Papers at 739-740.

The Washington courts have given clear and concise directions as to what Clark County must do for rural housing in the Comprehensive Plan. But it all has been ignored by both the Western Washington Growth Management Hearing Board and Clark County policy makers. Changes must be made to assure all of the people in the county are treated fairly and equitably and rural housing considered just as important as urban housing.

Sincerely,

Susan Rasmussen, President

Clark County Citizens United, Inc.
P.O.Box 2188
Battle Ground, Washington 98604

