

From: [Jeffrey Delapena](#)
To: [Kevin Schilling](#)
Cc: [Susan Ellinger](#); [Amy Wooten](#); [Daniel Klemme](#); [Daniel Bannon](#); [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: FW: Housing Element of Planning Community Discussion
Date: Wednesday, July 1, 2026 1:31:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[Clark County Written Testimony.pdf](#)

Good day, Kevin,

Thank you for providing RHAWA's feedback related to tomorrow's Planning Commission Work Session regarding the Comprehensive Plan Chapter Review on the draft Housing Element.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Planning Commission and will be added to the Index of Record.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Kevin Schilling <kschilling@rhawa.org>
Sent: Wednesday, July 1, 2026 12:05 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Susan Ellinger <Susan.Ellinger@clark.wa.gov>; Amy Wooten <Amy.Wooten@clark.wa.gov>; Daniel Klemme <DKlemme@rhawa.org>; Daniel Bannon <DBannon@rhawa.org>
Subject: Re: Housing Element of Planning Community Discussion

Thank you, Jeff.

Attached is RHAWA's written testimony to the Clark County Planning Commission. Please send accordingly.

Thank you,

Kevin



Kevin Schilling

Government Affairs and Advocacy Director

(206) 905-0603

kschilling@RHAWa.org

PO Box 31103, Seattle, WA 98103

| (206) 283-0816

| RHAWa.org



Rental Housing Association of Washington

This email contains general information and is not intended to apply to any specific situation. If you need legal advice or have questions about the application of the law in a particular matter, you should consult a lawyer.

From: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>

Sent: Wednesday, July 1, 2026 11:08 AM

To: Kevin Schilling <kschilling@rhawa.org>

Cc: Susan Ellinger <Susan.Ellinger@clark.wa.gov>; Amy Wooten <Amy.Wooten@clark.wa.gov>

Subject: RE: Housing Element of Planning Community Discussion

Hello Kevin,

As the clerk of the commission, you can submit comments directly to me and I will ensure these are received by the commissioners ahead of the meeting!

Best,



Jeff Delapena

Program Assistant

COMMUNITY PLANNING

564.397.4558



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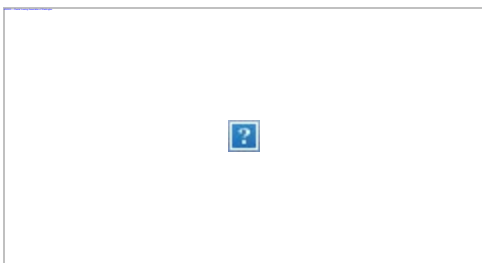
From: Kevin Schilling <kschilling@rhawa.org>
Sent: Wednesday, July 1, 2026 11:07 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Susan Ellinger <Susan.Ellinger@clark.wa.gov>; Amy Wooten <Amy.Wooten@clark.wa.gov>
Subject: Re: Housing Element of Planning Community Discussion

Hi Jeff,

Thank you so much for this. I'm working on finalizing my written testimony to send to the planning staff now. Is it best for me to send it to you all directly, or is there a place to submit written testimony that is then distributed? This is my first time navigating the Clark County system, so I appreciate any guidance you have.

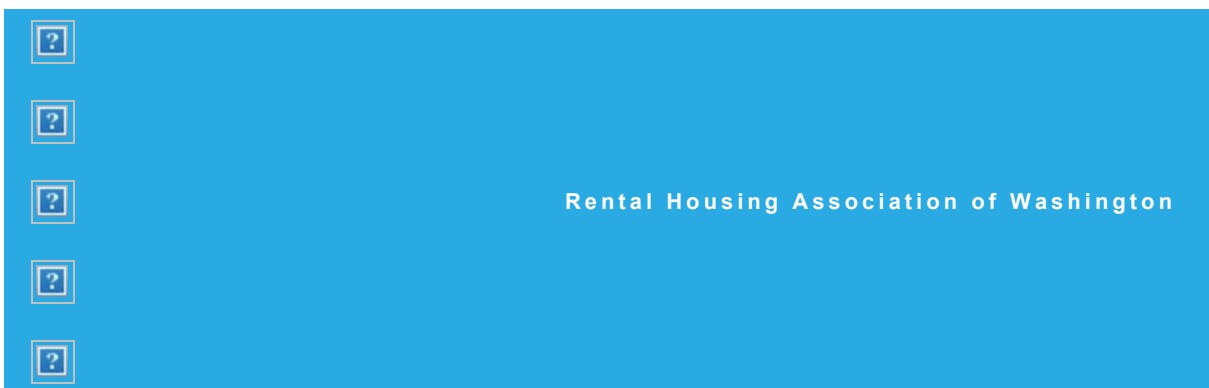
Thanks,

Kevin



Kevin Schilling
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From: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Sent: Tuesday, June 30, 2026 11:58 AM
To: Kevin Schilling <kschilling@rhawa.org>
Cc: Susan Ellinger <Susan.Ellinger@clark.wa.gov>; Amy Wooten <Amy.Wooten@clark.wa.gov>
Subject: RE: Housing Element of Planning Community Discussion

Good day, Kevin,

Thank you for your inquiry. Staff will be discussing the draft of the Housing Element chapter of the 2025 Comprehensive Plan with the Planning Commission at Thursday's Work Session. Attached is the draft of the chapter for your convenience, which is also available on the Planning Commission website.

I have CC'd our Housing staff contacts in case there are any specific questions about what will be discussed at the meeting, that they may be able to answer.

As a reminder, the public is welcome to attend either in-person or online, or to provide written comments ahead of the Work Session, but testimony will not be taken at the Work Session itself.

Best,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Kevin Schilling <kschilling@rhawa.org>
Sent: Tuesday, June 30, 2026 11:43 AM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Housing Element of Planning Community Discussion

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

I'm looking into the Clark County Planning Commission Work Session and wondering if you could provide some more info on the "Housing Element" portion of the discussion. What will be discussed? If it's pertinent to rental housing or construction, I'd love to be able to attend.

Please let me know,

Kevin



Kevin Schilling

Government Affairs and Advocacy Director

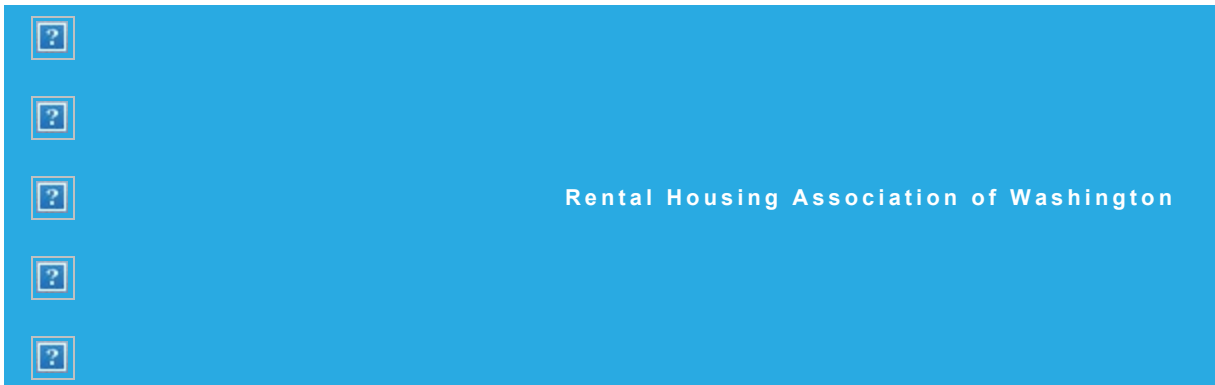
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WASHINGTON'S TRUSTED RESOURCE EMPOWERING HOUSING PROVIDERS

July 1, 2026

Clark County Planning Commission
Clark County Community Planning

RE: Comments on the Draft Housing Element

Dear Members of the Planning Commission,

On behalf of the Rental Housing Association of Washington (RHAWA), thank you for the opportunity to provide comments on Clark County's Draft Housing Element of the Comprehensive Plan. RHAWA represents thousands of rental housing providers throughout Washington State, including housing providers, property managers, and owners who collectively provide homes for residents across Clark County.

We appreciate the considerable work that has gone into developing this Housing Element of the County Comprehensive Plan. Overall, we believe the draft recognizes an important reality: solving the region's housing affordability challenges will require increasing housing supply, preserving existing housing, reducing unnecessary regulatory barriers, and encouraging meaningful partnerships between the public and private sectors. We commend the County for embracing many of these principles.

Areas We Support

We are reassured by several provisions throughout the draft Housing Element that recognize the importance of expanding and preserving housing opportunities.

- **Streamlined development process:** We strongly support shorter permitting timelines, online permitting, streamlined development standards, optimized residential densities, and reduced parking requirements because these policies reduce housing production costs and help make new rental housing financially feasible.

- **Expanded housing choice:** We appreciate the emphasis on accessory dwelling units, middle housing, duplexes, triplexes, fourplexes, cottages, townhomes, and other missing-middle housing options that create opportunities for residents at a variety of income levels.
- **Manufactured housing preservation:** We support recognizing manufactured housing communities as an important source of naturally affordable housing and encouraging preservation and voluntary resident ownership.
- **Preservation of existing housing:** We support rehabilitation, weatherization, and housing preservation programs that help protect older single-family rentals, duplexes, small apartment communities, manufactured homes, and modest multifamily properties.
- **Voluntary affordability incentives:** We appreciate the use of voluntary incentives and public funding sources, including HOME funds, Community Development Block Grants, document recording fees, and other housing resources, to encourage affordable housing production while preserving private investment feasibility.

Areas of Concern

While we are generally supportive of the Housing Element, we respectfully encourage the County to exercise caution as the plan moves from policy to implementation.

- **Use incentives and partnerships first:** Broad policy objectives related to affordability, anti-displacement, climate resilience, and manufactured housing preservation can be implemented through incentives, partnerships, public investment, and housing production.
- **Avoid mandates that could reduce supply:** We would have concerns about mandatory affordability requirements, rent regulation, local rent caps, mandatory inclusionary zoning, expanded relocation payment requirements, rental registration or inspection mandates, retrofit requirements, or restrictions on owners' ability to reinvest in, redevelop, convert, or sell their property.
- **Consider cumulative regulatory costs:** Additional requirements to increase operating costs and reduce the financial capacity to maintain existing housing or build additional homes.
- **Keep displacement analysis practical:** Displacement analyses should remain on planning tools rather than project-by-project permitting barriers that delay housing production or create new financial obligations.
- **Correct data inconsistencies:** Numerical information should be reviewed and corrected before being used to support future regulatory decisions.

RHAWA as a Resource

RHAWA stands ready to serve as an ongoing partner throughout implementation of the Housing Element.



- **Education and technical assistance:** RHAWA provides guidance to rental housing providers on fair housing compliance, screening best practices, reasonable accommodations, resident communication, maintenance obligations, and changing state housing laws.
- **Review of educational materials:** RHAWA welcomes the opportunity to review materials intended for rental housing providers and residents.
- **Stakeholder participation:** RHAWA can participate in stakeholder discussions as implementing ordinances are developed.
- **Program communication:** RHAWA can help communicate new housing programs and funding opportunities to local property owners.
- **Practical implementation feedback:** RHAWA can provide feedback on how proposed regulations will affect day-to-day rental housing operations and preservation.
- **Provider perspective:** RHAWA represents many owners and managers who maintain Clark County's naturally occurring affordable housing and can help ensure implementation is effective and economically sustainable.

Conclusion

We appreciate the thoughtful work reflected in this Housing Element and commend the County's focus on increasing housing supply, preserving existing housing, and expanding housing opportunities.

We encourage the Planning Commission to continue emphasizing voluntary incentives, streamlined permitting, housing diversity, and strong public-private partnerships while avoiding future regulatory approaches that could unintentionally discourage housing investment or reduce rental housing supply.

RHAWA looks forward to working collaboratively with Clark County throughout implementation of the Housing Element and appreciates the opportunity to serve as a constructive resource as this important work moves forward.

Thank you for your consideration.

Sincerely,



Kevin Schilling

Government Affairs Director

Rental Housing Association of Washington (RHAWA)

kschilling@rhawa.org

