From:	Cnty 2025 Comp Plan
To:	Justin Wood; Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez
Subject:	RE: Clark County Association of REALTORS® Letter of Comment to Planning Commission- Land Division
Date:	Tuesday, August 18, 2026 2:50:16 PM
Attachments:	image001.png image003.png image004.png image005.png image006.png image007.png Clark County Planning Commission Lot Splitting and Unit Lot Subdivision- CCAR Letter of Comment 8.18.2026 .pdf image002.png image009.png image010.png image011.png image012.png

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Good day, Justin,

Thank you for submitting CCAR's comments ahead of the Aug. 20th Public Hearing for the 2025 Comprehensive Plan Update.

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

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Justin Wood <ga@ccrealtors.com>
Sent: Tuesday, August 18, 2026 2:43 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>

Cc: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Clark County Association of REALTORS® Letter of Comment to Planning Commission- Land Division

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Good Afternoon, Jeffrey

Please relay the following letter of comment to the Clark County Planning Commission and applicable Community Planning Staff. Our association is encouraging the commission to recommend land use tools outlined in SB 5559 & HB 1096 to the Clark County Council, as a part of the comprehensive plan update.

Hope you are having a great day, thank you!

Best Regards,

Justin T. Wood
AHWD,
Government Affairs Director

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Clark County Association of REALTORS®

Clark County Association of REALTORS®

August 18th, 2026

Clark County Planning Commission

1300 Franklin Street, Sixth Floor PO Box 5000

Vancouver, WA 98666-5000

Dear Chair Johnson, and Commissioners Harroun, LeDuc Montgomery, Fadness, Bergthold, Barca, and Halbert

As the finalization of the comprehensive plan update draws near, our association and community partners in housing believe it is imperative that the county include two provisions already mandated for fully planning GMA (Growth Management Act) cities during this update- Unit Lot Subdivisions (SB 5559) & Lot Splitting (HB 1096). Without the inclusion of these land use tools, the county risks greatly skewing new middle housing construction to rental housing rather than owner-occupied homeownership opportunities within the unincorporated Vancouver Urban Growth Area (VUGA).

The county has chosen to adopt certain county optional middle housing tools outlined in HB 1337 (ADUs) and HB 1110 (Middle Housing), among others, during the low-density housing reform adopted in March of 2024. However, essential land use tools allowing for land division and more owner-occupied opportunities were not allowed yet; but appear to be excluded from the final update. We implore the commission to work with community planning and recommend tools outlined in SB 5559 & HB 1096 within the VUGA low-density housing code, and included as a part of the comprehensive plan update.

SB 5559- *"All cities and towns fully planning under the GMA must adopt or enact procedures for unit lot subdivisions. Unit lot subdivision refers to the division of a parent lot into separately owned unit lots. Local governments must include in their short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots."*

HB 1096- *"Cities must include in their development regulations an administrative review process for a lot split, which may be combined with concurrent review of a residential building permit for new single-family or middle housing. The application process may only require an administrative decision through which the application is reviewed and approved or denied by the planning director or other designee based on clear and objective development standards and without a pre-decision public hearing.*

The newly created lot must meet any locally adopted minimum density requirements. A city may not impose a limit on the number of dwelling units allowed on the parent lot or newly created lot that is less than the number of dwelling units allowed by the underlying zoning of the parent lot prior to the lot split.

Parent lots and newly created lots approved must have a lot split survey recorded with the county auditor with a notation that future lot splits are not allowed on the lot. If a lot split results in a lot of a size that would allow for further land division, the lot may be divided under other land subdivision processes."

Without these tools, opportunities for fee-simple owner-occupied townhomes, condominiums, cottage homes, and single-family homes throughout the unincorporated Vancouver Urban Growth Area (VUGA) will be severely diminished. Adoption of these tools would also engender great housing affordability, allowing the development community to avoid a short plat process that can easily cost $100,000; which, like all taxes and fees on housing, are passed on to the final homeowner or renter. Clark County has the largest unincorporated urban growth area in the state, and failing to include these provisions within the update would be a distinct error for expanding homeownership and addressing housing production and affordability in our community.

Our communities need to be on a level playing field to address the housing crisis. A property owner in the VUGA should be able to split their lot and create ownership opportunities, just as easily as a property owner will be able to in a city like Vancouver or Camas, post-update. Now that these tools are allowed by the legislature, the county needs to move forward and institute them within the low-density VUGA reforms. There is nothing preventing the county from adopting these provisions. We encourage the commission to review the legislation, work with community planning, and recommend these changes to the Clark County Council.

Moreover, the adopted land use alternative within this update depends on upzoning of existing property with the VUGA. These changes would turn buildable land once suitable for townhome construction into land exclusively for mid and high-rise apartments. This change will further compound market pressure for owner-occupied housing within the low-

density zoned VUGA. Market pressure will become far worse if this commission fails to recommend unit lot subdivisions and lot splitting within the VUGA as a part of the comprehensive plan update.

During a housing crisis, local governments, including county government, should pull all levers to address the issue. Including some county optional middle housing code provisions, and excluding others, will not adequately address the needs of our community.

We urge the Planning Commission to work with community planning and recommend to the council: *Adopt unit lot subdivision and lot splitting land use code within the low-density VUGA as a part of the Comprehensive Plan Update, as outlined in SB 5559 & HB 1096*.

Sincerely,

Justin Wood
Government Affairs Director

Clark County Association of REALTORS®