From:	Cnty 2025 Comp Plan
To:	Justin Wood
Cc:	Oliver Orjiako; Jose Alvarez
Subject:	RE: Comprehensive Plan Comment- CCAR Unit Lot Subdivisions & Lot Splitting
Date:	Tuesday, September 1, 2026 4:04:00 PM
Attachments:	image001.png image003.png image004.png image005.png image006.png image007.png Clark County Council Lot Splitting and Unit Lot Subdivision- CCAR Letter of Comment 9.1.2026 .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 related to 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 prior to their Sept. 3rd Hearing.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Justin Wood <ga@ccrealtors.com>
Sent: Tuesday, September 1, 2026 3:44 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle

Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Comprehensive Plan Comment- CCAR Unit Lot Subdivisions & Lot Splitting

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Good Afternoon, Chair Marshall and Councilors Yung, Belkot, Fuentes, and Little

On behalf of our association, I would like to submit the following letter of comment regarding the comprehensive plan update and homeownership opportunities within the unincorporated Vancouver Urban Growth Area (VUGA). Recent legislation has required cities to implement code during this update to allow unit lot subdivisions and simple lot splitting code (1 lot division from parent lot).

Clark County has the largest unincorporated urban growth area in the state, and we believe not including these tools during the 2027 Comprehensive Plan Update would be a mistake. Please work with Clark County Community Planning to ensure our community can use these tools to address the housing crisis and provide more home ownership opportunities within the context of middle housing.

Best Regards,

Justin T. Wood
AHWD,
Government Affairs Director

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Clark County Association of REALTORS®

Clark County Association of REALTORS®

September 1st, 2026

Clark County Council

1300 Franklin Street, Sixth Floor PO Box 5000

Vancouver, WA 98666-5000

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

As the finalization of the comprehensive plan update draws near, our association and community partners in housing, including the Development Engineering Advisory Board (DEAB), 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 into rental housing product, rather than owner-occupied homeownership opportunities within the unincorporated Vancouver Urban Growth Area (VUGA).

DEAB recommended allowing the same middle housing tools in their August 13th memo to the Planning Commission: "*DEAB recommends adopting Unit Lot Subdivisions (ULS) and simplified 2 lot-split procedures. They promote equity and opportunity, preserve homeownership opportunities, while still allowing compact housing forms and efficient use of urban land.*"

The county has chosen to adopt certain county optional middle housing tools outlined in HB 1110 (Middle Housing), among others, during the low-density housing reform, informed by the County's Housing Options Study & Action Plan (HOSAP) and adopted in March of 2024. However, essential land-use tools allowing for land division and more owner-occupied opportunities appear to be excluded from the final update. There is no language within the bills and ensuing RCW that prevents GMA fully planning counties from adopting tools within this legislation. Not including these tools, simply because they are optional for the county, doesn't adequately address the housing crisis our community is

facing. These tools will give more folks the opportunity to own a home and build generational wealth within the context of middle housing in the VUGA.

We implore the Council to work with Clark County Community Planning and adopt tools outlined in SB 5559 & HB 1096 within the VUGA low-density housing code, and included as a part of the 2027 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 greater 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 within the County.

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 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 Council to review the legislation and work with Community Planning to make these reforms during this update cycle.

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 almost exclusively for mid and high-rise apartments. This change will further compound market pressure for owner-occupied housing within the low-density zoned VUGA. During a housing crisis, local governments, including county government, should pull all levers to address the issue.

We urge the Clark County Council to work with community planning and: *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

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