From:	Jeffrey Delapena
To:	"NHolmberg@biaofclarkcounty.org"
Cc:	Oliver Orjiako; Jose Alvarez
Subject:	FW: BIA Written Testimony for tonight
Date:	Thursday, September 3, 2026 3:25:00 PM
Attachments:	img-ae0a5f57-eca7-43d3-a639-51658a11cad6.png img-0ca20817-c158-4305-9045-425704dd3612.png CC Planning Commission Submittal BIA - 090326.pdf image001.png image002.png image003.png image004.png
Importance:	High

Good day, Nelson,

Thank you for submitting BIA's comments related to the 2025 Comprehensive Plan Update.

As an FYI, written testimony is still accepted until the end of the hearing this evening. Public testimony was concluded at the Aug. 20th Hearing, and no additional spoken testimony will be heard tonight.

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 tonight's Hearing.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Nelson Holmberg <NHolmberg@biaofclarkcounty.org>
Sent: Thursday, September 3, 2026 3:21 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: BIA Written Testimony for tonight
Importance: High

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Good afternoon Jeffrey,

I've attached BIA's written testimony for the Planning Commission hearing tonight. It looks like I've missed my opportunity to submit it online, so I wanted to send it to you directly in hopes that it could still be added to the record for tonight's hearing.

If it weren't for being home with the flu, I'd be at the hearing to testify in person, too. But I'll spare everyone and let the written testimony stand for our comment.

Thank you!

Nelson

Nelson Holmberg | Government Affairs & Workforce Development Manager
BIA of Clark County - *a Top 30 NAHB Association*
Protecting and promoting the building industry.

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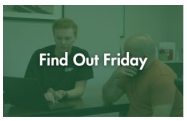
Phone: (360) 729-6099 **Web:** www.biaofclarkcounty.org
Email List | **SMS** | **Facebook** | **LinkedIn** | **Instagram** | **Pinterest** | **Members Group**

We've got some amazing events coming up! Find Out Friday is free and open to all! This open-house style event is designed to help members make the most of their BIA benefits, and guests curious about what membership can do for their business. Join us for the high-end kickoff event to the GRO Parade of Homes with the Hot Havana Nights VIP Night! Dress to impress for this themed evening featuring live entertainment, heavy appetizers, yummy desserts and so much more! Must be 21+ to attend. It's that time of year again! The 2026 GRO Parade of Homes is a single site showcase of high end, unique and innovative homes displayed through an educational and professional setting. Get your tickets today!



September 4



September 10



September
11-27

BIA
BUILDING INDUSTRY ASSOCIATION
OF CLARK COUNTY

Clark County Planning Commission:

Thursday, Sept. 3, 2026

Dear Commissioners:

I am submitting comment today on behalf of the 750-plus members of the Building Industry Association of Clark County.

Our members are the people who build the homes, apartments, townhomes and other housing that Clark County families depend on. We represent builders, developers, contractors, architects, engineers, suppliers and other professionals who understand what it takes to move a housing project from a concept on paper to an actual home that someone can live in.

Let me be clear at the outset:

The Building Industry Association supports the County's goal of creating more housing, increasing housing capacity and improving housing affordability.

But good intentions do not guarantee good outcomes, and we are concerned that portions of the proposed multifamily code could actually make it more difficult and more expensive to build the housing Clark County needs.

The most important issue before you is the proposed minimum density requirements.

We support increasing maximum densities. Maximum density creates opportunity. It allows the market, the property, infrastructure and surrounding community to determine whether additional density makes sense.

A minimum density is different. It is a mandate.

If that mandate requires a project to achieve a density that the site cannot physically accommodate or that the market cannot economically support, the result isn't more housing.

The result can be no housing at all.

The analysis submitted by DEAB provides an important reality check. The Board looked at actual multifamily projects that have been designed, financed, permitted and constructed in Clark County and comparable suburban areas.

The data on page 8 of DEAB’s submission is particularly instructive.

Many of these successful projects are garden-style, three-story walk-up apartments—the predominant multifamily product being built outside urban cores. Their densities generally fall in the range of roughly 18 to 22 units per acre.

Yet the proposed code would establish minimum densities of approximately 24 units per acre in R-36 and 40 units per acre in R-50.

That is a significant disconnect between what the code would require and what the market has demonstrated it can actually deliver.

And this isn't theoretical.

The DEAB analysis includes projects such as RRC Group Apartments at 22.5 units per acre, NE 179th Street projects at approximately 21 to 22 units per acre, Hazel Dell Apartments at 21.8 units per acre, South Ridge Apartments at 21.6 units per acre and NE 68th Street Apartments at 18.75 units per acre. Several of these properties would not satisfy the proposed minimum density requirements.

That should give this Commission pause.

We should not create a code based on a theoretical development model that makes successful, financeable housing products illegal or infeasible.

We should write a code that encourages housing to actually get built.

There is another concern.

When minimum density requirements become too aggressive, developers are forced to make difficult choices. They may have to reduce parking, build smaller units, eliminate family-sized housing, or pursue substantially different and more expensive construction types.

DEAB specifically notes that approximately 1.5 parking spaces per unit remains common for market-rate suburban projects and can be an important consideration for project financing.

We support parking reform. But parking reform should provide flexibility—not force a developer to underprovide parking simply to meet a density requirement.

Likewise, we should be careful not to create a system that produces more units on paper while producing fewer family-sized homes in reality.

A studio and a three-bedroom apartment both count as one unit under a simple unit-count system. When minimum density becomes aggressive, the incentive is obvious: build smaller units so the project can achieve the required number.

That is exactly the wrong incentive if our objective is to provide housing for families.

DEAB points out that the City of Vancouver has addressed this issue by providing density bonuses for two- and three-bedroom units.

We encourage Clark County to consider a similar approach.

We also urge the Commission to look carefully at the proposed **blanket upzoning** of existing properties.

A property that makes sense at R-36 in one location may not make sense at R-36 in another.

Parcel configuration, infrastructure, transportation access, surrounding development, utilities, environmental constraints and market conditions all matter.

DEAB appropriately recommends site-specific review rather than automatically converting entire existing zoning categories to higher-density designations.

The same principle applies to smaller and constrained sites.

A half-acre—or even smaller—parcel can face frontage, access, stormwater, fire, landscaping, setback and parking constraints that simply don't exist on a large development site.

The County should provide flexibility so that these properties can contribute housing rather than becoming effectively undevelopable.

Finally, we strongly support one recommendation in the DEAB report that I believe should become a prerequisite before these regulations are finalized:

Stress-test the proposed code against actual development sites.

Not theoretical sites. Not a spreadsheet showing that the numbers work. But actual Clark County properties.

Take existing successful multifamily projects. Take small infill sites. Take irregular parcels. Take R-30 properties proposed for R-50. Take mixed-use sites. Put the proposed regulations on them, including density, parking, stormwater, landscaping, fire access,

setbacks and amenity requirements, and then determine whether a reasonable, marketable and financeable project can actually be built.

That is the real test.

As DEAB stated, the success of the Comprehensive Plan ultimately will be measured by housing that is actually constructed — not theoretical capacity shown in a planning model.

The Building Industry Association agrees.

We don't need regulations that simply produce impressive numbers in a planning document. We need regulations that produce homes.

We respectfully ask the Planning Commission to support the County's housing objectives while recommending greater flexibility in minimum densities, site-specific consideration of upzoning, preservation of viable housing types, reasonable standards for small and constrained sites, flexibility in parking and amenity requirements, incentives for family-sized housing, and a rigorous real-world stress test before adoption.

Our members want to build. Clark County needs more housing.

Let's make sure the code allows those two things to happen at the same time.

Thank you for your time and for your service to Clark County.