From:	Cnty 2025 Comp Plan
To:	"wkinion@kinionlimited.com"; Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez; Rebecca Messinger
Subject:	RE: Comprehensive Plan Update Comments
Date:	Monday, September 14, 2026 8:19:00 AM
Attachments:	image001.png image002.png image003.png image004.png

Good day, Wyatt,

Thank you very much for submitting comments related to the 2025 Comprehensive Plan update.

These will be added to the Comprehensive Plan Index of Record. I am including Rebecca Messinger from the Council's Office as well for awareness.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Clark County <webteam@clark.wa.gov>
Sent: Saturday, September 12, 2026 12:10 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

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Submitted on Sat, 09/12/2026 - 12:09 PM

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Wyatt

Last Name
Kinion

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wkinion@kinionlimited.com

Address
Vancouver, Washington. 98664

Message Subject
Subject: Zoning and Land Use, Comment on Manufactured Home Park Redevelopment

Comments
9/12/26
ATTN: Clark County Council
Subject: Zoning and Land Use, Comment on Manufactured Home Park Redevelopment
Redevelopment of a manufactured home park (MHP) should be evaluated not simply as a land-use transaction, but as a resident-centered opportunity to replace aging infrastructure, reduce health and safety risks, expand housing choice, and create lasting community benefit. At the same time, the County should not create or apply a narrow “use exception” for the redevelopment of “affordable housing” where that exception could bypass the protections, public review, or replacement-housing obligations that are essential to preventing displacement of manufactured-home residents. Manufactured home parks are an important source of unsubsidized affordable housing. Residents often own their homes while renting the land beneath them; consequently, redevelopment without enforceable relocation, compensation, and replacement commitments can impose extraordinary hardship. This is adequately addressed by the State of Washington regulations, and the County should avoid expanding upon it. This land-lease structure is a poor residential market design for all parties involved and must be actively incentivized away. If the County insists that MHP re-development in Clark County remains a gap despite lot rent caps, park closure notices, opportunity to purchase and relocation assistance, and is enacting “Overlay Zone” as described, the following is proposed for an EXCEPTION to the overlay:
Proposed Additional Use Exception: Where an MHP is located on land already zoned for

residential or mixed use, any redevelopment approval should require the MHP be retained for residential use. The redevelopment approval should also require it be subdivided and replat to remove the poor incentive structure of a land-lease MHP community into individually owned residential lots OR, demonstration that redevelopment yields an equivalent residential density to the existing MHP footprint and preferably a greater density where the comprehensive plan, infrastructure capacity, and neighborhood context support it. Mixed use (residential + commercial) development will remain in the review of the County Council, with special consideration for redevelopment plans that incorporate a hybrid development of commercial + residential, where the residential density use exception above is met (think multi-family buildings with commercial shops on the ground floor).

Density retention should be the metric adopted by the County INSTEAD of the "affordable housing" fixed rate standard intended to support limited nonprofit redevelopment being the only use exception. Housing affordability should be the focus for all income ranges of families, not just the edges of the bell curve. Currently, there is little to no broadly accessible rung on the latter for young professionals to own their first home (and the land underneath it!) in Clark County as admitted by Clark County's relaunch of its first-time homebuyer down-payment-assistance program in 2025.

This standard would ensure that redevelopment produces a genuine public benefit: new safe and durable homes, meaningful replacement, sufficient housing capacity to avoid a net loss of homes or displacement of lower-income households with the added benefit of owning the land beneath it where subdivided. The MHP land-lease structure is a poor design for all parties and re-development must be incentivized to property developers without penalty to those who reside there.

This has been done before with success in other cities and counties. Successful projects demonstrate that difficult transitions can yield better outcomes when residents receive early notice, active participation, individualized relocation assistance, full moving and replacement-cost support, and a clear, enforceable path to comparable or improved affordable housing. It is my argument that this is adequately addressed through the Washington State regulation. If the county insists that "gaps and vulnerabilities remain" unaddressed by the state, it should not narrow the aperture of approval to prevent all re-development unless approved by a small group of county leaders bound to be swayed by the political pressure of inconsiderate big developers or organized anti-growth recalcitrance.

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