Official Public Comment Submission
CLARK COUNTY COMPREHENSIVE GROWTH MANAGEMENT PLAN

TO: Clark County Planning Commission & Clark County Councilors
FROM: Nancee Alexander, Resident of Hazel Dell Mobile Home Community
DATE: September 14, 2026
REGARDING: Proposed Amendments to CCC 40.250.120 (Manufactured Home Park Overlay Zone)

Executive Summary of Enclosed Written Testimony

This packet details critical structural vulnerabilities within the current draft text of the **Manufactured Home Park (MHP) Overlay Zone**, specifically targeting the unmonitored "Economic Viability" exemption clause.

Using current local case data from the **Hazel Dell Mobile Home Community**, this document demonstrates how predatory corporate operators utilize tiered entry pricing ($1,250 move-in vs. $700 baseline rents), unlawful delivery tactics (taping statutory notices directly to doors rather than via certified mail), and artificial lot vacancies (13 unleased lots; 270+ days vacant) to manufacture artificial financial distress and force land-use conversions.

Enclosed Legal Citations & Legislative Requests:

Requirement 1: Total elimination of open-ended economic loopholes via municipal frameworks established under *Laurel Park Community, LLC v. City of Tumwater* (9th Cir. 2012).
Requirement 2: Codification of a Senior MHP Sub-district utilizing density-credit mechanisms mirrored after Kenmore Municipal Code (KMC) Chapter 18.80.
Requirement 3: Statutory mandate for a corporate-funded **Triple-Rate Senior Displacement Mitigation Fee** reinforcing tenant protections under RCW 59.20 and RCW 59.21.
Requirement 4: Non-discretionary disqualification of applications relying on self-inflicted financial distress or predatory vacancy steering. The ordinance must explicitly

define "viability" as a modest baseline yield (5% to 7%), establishing that a corporation's failure to reach exorbitant private equity returns (such as a 20% ROI target) does *not* constitute legal grounds for a land-use conversion.

Requirement 5: Mandated local **vacancy control to prevent evasion of State Law (HB 1217)**, locking rent caps directly to the lot parcel rather than the tenant to eliminate predatory rent-tiering.

Submitted formally into the public record for the Clark County Manufactured Home Park Information Session.

Subject: Public Comment: Legal Precedents & 5 Core Requirements to Amend the MHP Overlay (Hazel Dell Mobile Home Community)

Dear Clark County Planning Team and County Councilors,

My name is **Nancee Alexander**, and I am a resident of **Hazel Dell Mobile Home Community** (1709 NE 78th St, Unit 140). While I strongly support the intent of the proposed **Manufactured Home Park (MHP) Overlay Zone**, I am writing to formally submit specific Washington State statutory and municipal code precedents that the county must adopt to close the open-ended "economic viability" exemption, mandate landlord mitigation, and establish dedicated space-rent stabilization under **CCC 40.250.120**.

As currently written, the overlay allows owners to redevelop a park if they demonstrate that continuing operations is no longer financially viable. For mega-corporations and institutional private equity groups—like GSC Investments, which currently has our community bundled for sale—this standard is dangerously easy to manipulate. Large corporate owners have the resources to artificially inflate operating costs, defer routine maintenance, or alter financial ledgers to manufacture a "loss" on paper, creating a backdoor avenue to force a rezoning change.

In fact, we are already seeing predatory management tactics at play right now at Hazel Dell Mobile Home Community that could be used to exploit this very loophole:

- Long-term, regular residents who have lived here for years are currently paying approximately **$700 a month** in space rent.
- However, the corporate owners have spiked the new move-in price to **$1,250 a month**.

This extreme **$550-per-month discrepancy** has intentionally broken our local housing ecosystem. Because of this artificial entry rate, **Hazel Dell Mobile Home Community currently has 13 unleased lots sitting empty, with our longest vacant lot sitting unleased for over 270 days.** Furthermore, I have spoken directly with neighbors who are trapped—trying to sell their homes *below* what they originally paid for them because incoming buyers are completely priced out by the exorbitant $1,250 lot rent.

The financial crisis this corporate squeezing creates for families is devastating. **I have a neighbor right now who is juggling both a mortgage on their mobile home unit alongside our regular monthly site lease payments.** If a predatory corporate buyer is permitted to use an unviability loophole to shut down this park, residents like my

neighbor will face immediate financial ruin—left completely homeless while still legally forced to pay off a bank mortgage on a structure that has nowhere to sit.

Compounding these economic pressures, the landlord has consistently mishandled statutory notification procedures. The landlord initially bypassed certified mail or personal hand-delivery as strictly mandated by **RCW 59.20.325(2)**, choosing instead to tape time-sensitive notices to residents' exterior doors. While the owners eventually attempted to fix this error by mailing "return receipt" letters, **they explicitly omitted the legally required disclosures identifying where tenants can find organizational and financial assistance to pursue their right to purchase.** Hiding these state-mandated resource channels directly subverts the intent of the law and actively hinders a senior community's ability to protect itself.

Clark County does not need to reinvent the wheel to fix this. Cities across Washington State have already written strict ordinances that protect land *solely* for mobile home park preservation, successfully defeating corporate legal pushback. To ensure this overlay stands up to judicial scrutiny, I urge the Planning Commission and Council to adopt and integrate the following five core regulatory frameworks into the final text of **CCC 40.250.120**:

1. **Establish a Senior Mobile Home Park Sub-district:** Within the broader MHP Overlay, the county should create a specific Senior MHP Sub-district to protect designated 55+ age-restricted communities like Hazel Dell Mobile Home Community. This sub-district will codify the park's specialized role in providing senior affordable housing, creating an additional legal barrier that prevents corporate buyers from converting senior spaces into market-rate rentals or non-residential developments.
2. **Remove the Open-Ended 'Economic Viability' Loophole (Precedent: *Laurel Park Community, LLC v. City of Tumwater*):** Clark County should eliminate the vague financial unviability loophole by mirroring the **City of Tumwater Municipal Code (TMC) Chapter 18.49**. Tumwater's strict preservation overlay was challenged by corporate landowners but was explicitly **upheld by the U.S. Ninth Circuit Court of Appeals** (*Laurel Park Community, LLC v. City of Tumwater*, 2012). The courts ruled that restricting land solely to mobile home use is a constitutionally sound exercise of local zoning authority to protect low-income housing. If an owner claims financial distress, the county should look to a Transfer of Development Rights (TDR) mechanism mirrored after **Kenmore Municipal Code (KMC) Chapter 18.80** to protect land value without sacrificing affordable housing, rather than granting a land-use conversion.
3. **Mandate a Triple-Rate Senior Displacement Mitigation Fee:** If a park closure or land-use conversion is ever approved under an unviability claim, the code

must mandate that the developer pay a penalty-tier mitigation fee equivalent to triple the standard baseline relocation costs. This mandatory fee must comprehensively cover 100% of the actual physical expenses required to safely dismantle, transport, and hook up manufactured homes to a new location under **RCW 59.21.021**, or mandate a mandatory buyout at pre-distressed market value if a unit has an active mortgage or cannot structurally survive a relocation.

4. **Codify Bright-Line Metrics for "Economic Viability" and Disqualify Self-Inflicted Losses:** The local code must explicitly define "economic unviability" to protect against manufactured claims. Land-use law guarantees a right to a reasonable economic return, not maximum corporate profit. The overlay must establish that a property remains legally and financially "viable" if its net operating income yields a baseline return equivalent to the annualized Federal Reserve Prime Rate (or a capped net yield of 5% to 7%). A developer's failure to meet an exorbitant corporate hurdle or private equity target (such as a 15% or 20% ROI) shall explicitly *not* constitute financial unviability. Furthermore, any unviability application must be automatically null and void if the owner has artificially engineered vacancies or manufactured paper losses through predatory rent-tiering, legally deficient statutory notices, or intentional maintenance neglect.
5. **Implement Local Vacancy Control to Prevent Evasion of State Law (HB 1217):** To definitively stop predatory rent-tiering, the overlay text must mandate local vacancy control that caps space rents on unleased lot parcels. Under Washington State's Rent Stabilization Law (**HB 1217**), the Legislature established a strict public policy protecting manufactured homeowners by capping annual lot increases at **5%** [HB 1217]. Corporate owners are actively evading the intent of HB 1217 by weaponizing a gap in state law—skyrocketing vacant entry rates to an extortionate **$1,250** to freeze the housing market and deliberately engineer a high vacancy rate. Clark County has the clear municipal land-use authority to tie rent stabilization directly to the physical land parcel itself within an affordable housing overlay zone. The code must mandate that upon a tenant vacancy or home sale, the lot rent increase is bound by the state's 5% cap based on the property's prior historical ledger [HB 1217]. This eliminates the financial incentive for private equity buyers to artificially starve the community of occupants to manufacture "economic unviability."

Please close this corporate loophole, adopt these proven Washington legal frameworks, and give the residents of Hazel Dell Mobile Home Community meaningful housing security.

Sincerely,

Nancee Alexander
Hazel Dell Mobile Home Community Resident
1709 NE 78th St, Unit 140, Vancouver, WA 98665

Dear Councilors,

More information has come to my attention regarding the corporate real estate firm GSC Investments (operating locally under Collective Communities). The firm is actively bundling and divesting its entire portfolio of manufactured housing properties across the Pacific Northwest. This mass divestment is a direct reaction to the strong rent stabilization laws implemented in Washington State **(HB 1217)**, which strictly cap annual manufactured housing space rent increases at 5%. Because corporate equity groups can no longer extract unlimited rent hikes from vulnerable tenants, they are choosing to offload their assets en masse.

Within Clark County specifically, GSC is bundling and selling five of its communities located within our unincorporated borders. This includes the senior-restricted bundle of **Lazy Z Mobile Home Court** and **Hazel Dell Mobile Home Estates**, as well as three additional family-friendly communities in the Sifton and Orchards neighborhoods: **Sifton Gardens**, **Sunrise Acres**, and **Idylwood**. While the firm is also simultaneously divesting its **Battle Ground Mobile Home Community** (a 55-and-older senior community comprising nearly 180 lots that directly affects approximately 270 vulnerable older adults), that community sits within the incorporated city limits of Battle Ground; therefore, I am explicitly excluding it from this communication to focus solely on the immediate housing crisis facing unincorporated Clark County.

I also wish to make an important correction regarding the notice packet that was distributed to councilors. GSC did include information for seniors on finding financial assistance to potentially purchase the mobile home parks themselves. However, this resource information was printed at the very bottom of the letter in extremely small print. **They followed the letter of the law, but not the spirit of the law.**

Furthermore, I have conducted deeper research into the pending sale of **Hazel Dell Mobile Home Estates**. While a total acquisition price is not transparently listed, I uncovered commercial real estate listings for the park that market the space rent at an alarming $1,300 per month. All five of these local parks are currently being offered for sale as turnkey operations.

The potential sale of the senior-restricted bundle in Hazel Dell represents a sweeping threat to the county's affordable senior housing infrastructure. Together, **Lazy Z Mobile Home Court** (45 to 61 lots) and **Hazel Dell Mobile Home Estates** (128 lots) encompass a combined 173 to 189 total home sites. This corporate divestment directly jeopardizes the housing stability of approximately 260 to 320 vulnerable older adults, many of whom live alone and subsist entirely on fixed incomes.

Similarly, the sale of the all-ages bundle in the Sifton and Orchards neighborhoods delivers an equally devastating blow to local working families. Combined, **Sifton Gardens** (31 lots), **Sunrise Acres** (38 lots), and **Idylwood** (50 lots) encompass 119 total home sites. This divestment threatens to disrupt or displace approximately 270 to 330 local residents, including school-aged children and hard-working families who rely on these properties as one of the few remaining sources of unsubsidized affordable housing in the county.

When private equity portfolios of this scale are bundled and sold off as turnkey investment packets without transparent terms or fair opportunity for tenant purchase, it routinely triggers predatory rent restructuring or aggressive redevelopment schemes that displace entire neighborhoods of residents who have nowhere else to go. Because all five of these interconnected parks sit squarely within unincorporated Clark County, they fall directly under your jurisdiction. I urge the Council to closely monitor these pending sales, look into these notice deficiencies, and utilize all available county housing protections and zoning tools to safeguard these lots and the hundreds of residents who call them home.

Thank you for your time and prompt attention to this urgent matter.

Sincerely,

Nancee Alexander
1709 Northeast 78th Street, Unit 140
Vancouver, Washington 98665
360-828-1056
engsetr@yahoo.com

September 13, 2026

Dear Clark County Counselors,

Please find below a comprehensive overview of current entry-level, budget-friendly housing rates in Clark County, Washington. This breakdown tracks the local affordable market across various configurations, moving sequentially from individual single-room rentals up to standalone two-bedroom homes. **Please note that all listed costs and rental ranges are verified current as of September 13th, 2026.**

The baseline rates provided below are aggregated from active market inventories and historical rental indices across localized rental databases, specifically cross-referencing aggregate listings from Zillow, Apartments.com, HotPads, and Roomies.

The baseline monthly rent tiers reflect standard market-rate affordable housing, concentrated primarily in areas like Hazel Dell, North Image, Orchards, and Central Vancouver:

- **Single Room Rentals ($500 – $750 / month):** This entry point typically consists of a private bedroom within a shared single-family home or apartment complex. Utilities are often split among household members or bundled into a flat rate. Living areas, kitchens, and bathrooms are generally shared.
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- **One-Bedroom Apartments ($1,100 – $1,350 / month):** Providing a completely separate bedroom layout, these units average 600 to 700 square feet. This value tier features standard residential layouts and neighborhood parking.
- **Two-Bedroom Apartments ($1,500 – $1,700 / month):** These multi-room layouts range from 850 to 1,000 square feet, featuring a shared central living area, closet space, and standard community parking.
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- **Two-Bedroom Single-Family Homes ($2,200 – $2,400+ / month):** Detached standalone homes represent the upper tier of the affordable segment. While they

command a premium, they include completely private yards, individual driveways, and standalone garage space.

Please note that all options listed above represent temporary rental units. They are not real property belonging to the individual renting the site, and tenancy grants no equity, long-term ownership, or permanent housing security.

In actuality, as manufactured home owners, we are finding out that what we thought was long-term security and equity is instead a vulnerable position, as we do not own the land beneath our homes and remain entirely subject to escalating lot rents and displacement.

Sincerely,

Nancee Alexander
Tenant, Hazel Dell Estates MHC
360-828-1056
engsetr@yahoo.com

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In fact, we are already seeing predatory management tactics at play right now at Hazel Dell Mobile Home Community that could be used to exploit this very loophole:

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This extreme **$550-per-month discrepancy** has intentionally broken our local housing ecosystem. Because of this artificial entry rate, **Hazel Dell Mobile Home Community currently has 13 unleased lots sitting empty, with our longest vacant lot sitting unleased for over 270 days.** Furthermore, I have spoken directly with neighbors who are trapped—trying to sell their homes *below* what they originally paid for them because incoming buyers are completely priced out by the exorbitant $1,250 lot rent.

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Please close this corporate loophole, adopt these proven Washington legal frameworks, and give the residents of Hazel Dell Mobile Home Community meaningful housing security.

Sincerely,

Nancee Alexander
Hazel Dell Mobile Home Community Resident
1709 NE 78th St, Unit 140, Vancouver, WA 98665

Councillors

I discovered an error in the previous packet and I wish to provide you with correct information. (Please see the attached for the correction)

Also Ii have been doing further research upon GSC holdings in unincorporated Clark County and the new updated metrics of the consequences of the GSC divestment of all of their properties (that I could find) located in unincorporated Clark County.

GSC is liquidating their holdings due to the passing of **HB 1217,** GSC began purchasing properties in 2016 and completed their purchase spree in 2022. During their purchase of Hazel Dell Estates MHC (of which I am a tenant) on 12/2/2022 thru the passing of **HB 1217** I have had my lease/rent raised $225.00, the $25.00 raise was last year, but at the same time as that low increase GSC also turned all utilities that were being paid by the park to pass through billing and stopped paying for our garbage pick up.. In essence, the tenants once again had a lease raise of approximately $100.00.

GSC has now reached the end of their abilities to legally raise our rent above the state mandated 5%. thus, the mass sell off of ALL of their Pacific Northwest holdings.Our county is a microcosm of what is happening all over the PNW.

Please make our overlay as strong and bullet proof as possible so the the residents of Clark County, especially our most vulnerable seniors once again feel safe and stable knowing that their homes are protected from predatory corporations such as GSC.

Thank you,

Nancee Alexander
1709 NE 78th St, Unit 140
Vancouver, WA 98665
(360)828-1056
engsetr@yahoo.com

Dear Councilors,

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When private equity portfolios of this scale are bundled and sold off as turnkey investment packets without transparent terms or fair opportunity for tenant purchase, it routinely triggers predatory rent restructuring or aggressive redevelopment schemes that displace entire neighborhoods of residents who have nowhere else to go. Because all five of these interconnected parks sit squarely within unincorporated Clark County, they fall directly under your jurisdiction. I urge the Council to closely monitor these pending sales, look into these notice deficiencies, and utilize all available county housing protections and zoning tools to safeguard these lots and the hundreds of residents who call them home.

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Sincerely,

Nancee Alexander
1709 Northeast 78th Street, Unit 140
Vancouver, Washington 98665
360-828-1056
engsetr@yahoo.com

September 14, 2026 at 5:26 PM PDT

Dear Clark County Counselors,

Please find below a comprehensive overview of current entry-level, budget-friendly housing rates in Clark County, Washington. This breakdown tracks the local affordable market across various configurations, moving sequentially from individual single-room rentals up to standalone two-bedroom homes. **Please note that all listed costs and rental ranges are verified current as of September 13th, 2026.**

The baseline rates provided below are aggregated from active market inventories and historical rental indices across localized rental databases, specifically cross-referencing aggregate listings from Zillow, Apartments.com, HotPads, and Roomies.

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command a premium, they include completely private yards, individual driveways, and standalone garage space.

Please note that all options listed above represent temporary rental units. They are not real property belonging to the individual renting the site, and tenancy grants no equity, long-term ownership, or permanent housing security.

The data demonstrates a severe, systemic crisis of physical housing volume within Clark County's affordable market, highlighted by a sharp geographic imbalance. Compiling a total of fewer than 45 actual market vacancies across all low-tier configurations underscores a stark reality: even if an individual has the required income, there is effectively no immediate physical inventory available to absorb them.

When examining the county geographically, the severe supply bottleneck becomes even more acute for residents outside the urban core:

- **City of Vancouver (Incorporated):** Holds the majority of the county's remaining entry-level inventory with **32 total open vacancies**. This consists primarily of high-density studio and apartment layouts.
- **Unincorporated Clark County (Hazel Dell, Orchards, Five Corners, etc.):** Features a near-total exhaustion of affordable inventory, with only **13 total bargain units** immediately open across all unincorporated county boundaries combined.

Furthermore, across both jurisdictions, there are **0 active vacancies** for standalone two-bedroom single-family homes, duplexes, or townhomes within the entry-level price threshold.

In actuality, as manufactured home owners, we are finding out that what we thought was long-term security and equity is instead a vulnerable position, as we do not own the land beneath our homes and remain entirely subject to escalating lot rents and displacement. Because the open market in unincorporated Clark County has effectively zero vacancy to offer, displacement from a manufactured housing community leaves these residents with virtually no alternative shelter options anywhere near their existing neighborhoods.

Sincerely,

Nancee Alexander
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