From:	Rebecca Messinger
To:	Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez; Sue Marshall; Glen Yung; Michelle Belkot; Wil Fuentes; Matt Little; Kathleen Otto
Subject:	FW: DEAB Follow Up Memo to County Council
Date:	Thursday, October 1, 2026 2:32:09 PM
Attachments:	DEAB Follow Up Memo to County Council.pdf image001.png image002.png image003.png image004.png image005.png

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Jeff,

Please see the attached memo from DEAB. Thanks!

Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305
Email: Rebecca.Messinger@clark.wa.gov

From: Michelle Pfenning <Michelle.Pfenning@clark.wa.gov>
Sent: Thursday, October 1, 2026 1:33 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>
Cc: Kathleen Otto <Kathleen.Otto@clark.wa.gov>; April Furth <April.Furth@clark.wa.gov>; Jordan Boege <Jordan.Boege@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: DEAB Follow Up Memo to County Council

DO NOT REPLY ALL

Hello Council,

Please find attached a follow up memo regarding:
Follow up DEAB Comments to the Council Work Session on the Housing Action Plan (Phase II) Multifamily Code Updates.

If you have any further questions and or comments, please do not hesitate to contact me directly.

Thank you,
Michelle Pfenning

Michelle Pfenning
Council Administrative Assistant
Direct Phone: 564.397.5109
County Mobile: 360-904-0688
Michelle.Pfenning@clark.wa.gov

"Just when the caterpillar thought her life was over, she became a Butterfly".-Barbara Haines Howett

Memorandum

TO: Clark County Council
FROM: Development and Engineering Advisory Board (DEAB)
DATE: September 29, 2026
RE: Follow Up DEAB Comments to the Council Work Session on the Housing Action Plan - (Phase 2) Multifamily Code Updates

Several Development and Engineering Advisory Board (DEAB) members listened to the County Council Work Session on September 16th, 2026 and noted a few questions that came up at the work session that remained unresolved. We are providing this memo as a clarification to several items from the work session to be considered prior to the Public Hearing on October 1, 2026. DEAB wants to make sure the Council has an accurate understanding of DEAB's position and the technical basis for the recommendations before the code moves forward. Please also see the comments DEAB submitted previously that this clarification addresses.

1. Timing of DEAB's comments

DEAB's comments were characterized as coming in at the last minute.

DEAB feels it important to clarify that the underlying concerns are not new. DEAB has been raising these same general issues for months, and several of them have also been discussed through the HOSAP process. What changed recently was that DEAB provided more detailed analyses, project examples, and specific proposed code language as requested by members of the Planning Commission and Clark County Council shortly prior to the Planning Commission hearing.

2. Whether DEAB's comments represented the full Board

A Councilor asked whether the recommendations represented the entire DEAB Board. Staff indicated they did not know.

DEAB's position was considered and voted on by the Board. The memo and recommendations were drafted, circulated, reviewed, and approved by the DEAB before being submitted to the Planning Commission and Council on behalf of DEAB. As such, these are full board recommendations, not comments from one or two individual members.

3. DEAB's role versus the HOSAP process

There was also discussion about DEAB commenting separately from the HOSAP Committee.

DEAB participated in HOSAP and provided input through that process. DEAB also serves as an advisory board to the County Council on development and engineering matters. Those are complementary roles, not mutually exclusive ones. DEAB believes it is important to clarify that many of the concerns DEAB previously raised through HOSAP were not incorporated into the proposed code.

4. Housing capacity versus a code that works in practice

Staff representatives continued to emphasize that reducing the proposed minimum densities would affect the housing-capacity assumptions used in the Comprehensive Plan.

DEAB has not recommended abandoning the Comprehensive Plan housing goals or the proposed higher maximum densities. Our concern is whether the implementing code will allow housing to be financed, designed, permitted, and constructed. This is ultimately about planning for housing that can, in reality, be produced, not simply satisfying a capacity calculation. The implementing code needs to work in application and should not create additional barriers to housing production or affordability.

As stated in our prior comments, **the success of the Comprehensive Plan will ultimately be measured by housing that is actually constructed, not simply theoretical capacity shown in a planning model.**

5. Characterization of DEAB's project examples

Staff and the consultant characterized DEAB's project analysis as showing that primarily "townhome or ownership products" would have difficulty meeting the proposed densities and suggested that most of the multifamily examples either met or were relatively close to the proposed densities.

Based on our analysis, that does not accurately describe the examples submitted. Some projects were relatively close to the proposed minimum in areas associated with the lower-density multifamily zones. But a major concern is the proposed conversion of existing R-18/R-22 properties to R-36 and R-30/R-43 properties to R-50, with proposed minimums of 24 and 40 units per acre, respectively. Many of the projects DEAB reviewed would fall substantially below the proposed minimum densities applicable under the proposed zoning conversion, particularly the 40-unit-per-acre minimum associated with R-50 zone.

Conclusion

DEAB continues to support the County's efforts to increase housing capacity and appreciates many of the proposed changes intended to reduce regulatory barriers. We support increasing maximum density, reducing unnecessary parking mandates, simplifying development standards, and improving flexibility.

At the same time, the success of the Comprehensive Plan will ultimately be measured by housing that is actually constructed - not theoretical capacity shown in a planning model.

The County should be cautious about increasing minimum densities, eliminating viable housing types, or establishing standards that work mathematically but not economically or physically on sites that have become more challenging to develop. Greater flexibility in allowable housing types and densities will allow individual projects to respond to market demand, site conditions, neighborhood context, and changing housing needs while still advancing the County's overall housing objectives.

DEAB recommends that staff continue working with DEAB and other development, housing, real estate, and design professionals to stress-test and refine the proposed code before final adoption.

If necessary, DEAB believes this additional code refinement could occur after adoption of the Comprehensive Plan, allowing the County to complete the planning process while ensuring the implementing development code is functional and capable of advancing the County’s housing objectives.