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Subject
Written Comments on the 2025-2045 Comprehensive Plan Update — Market Factor Assumptions in the Land Capacity Analysis

Date of Hearing
Thu, 10/01/2026

Comment
Dear Chair Marshall and Members of the Council:

On behalf of the Building Industry Association of Clark County (BIA), thank you for the opportunity to comment on the Comprehensive Plan update. BIA supports a Comprehensive Plan built on accurate, defensible land capacity analysis, and we offer the following comment to help ensure the record supports the capacity findings the Council relies on.

The Question
Our concern is not whether the Vacant Buildable Lands Model (VBLM) uses a market factor. It does, and it should. Our concern is whether the specific factors used in the final land capacity analysis are adequately supported by Clark County's actual development experience and local market conditions.

The Current Assumptions
The County's VBLM methodology applies “never-to-convert” assumptions of 10 percent for vacant residential land and 30 percent for underutilized residential land, with no comparable market factor applied to commercial, business park or industrial land. These same figures are confirmed in the County's own VBLM Methodology documentation and in the 2020

ECONorthwest issue summary memo prepared for Council's Buildable Lands update, which notes that “there is no specific market factor/never-to-convert assumption for commercial or industrial land except on constrained land.”

State Guidance
RCW 36.70A.215(3)(b)(i) requires counties to use “a reasonable land market supply factor” when evaluating land suitable for development, and to identify reductions in the amount of land suitable for development and redevelopment on that basis. Commerce's Buildable Lands Guidelines direct counties to analyze, justify and apply an appropriate market supply factor, considering infrastructure costs, cost of development, permitting and development timelines, market availability of land, and market demand. Commerce's guidance recognizes that developable land may remain undeveloped for a range of market reasons and expressly allows local circumstances and local data to inform the factor a county applies. Neighboring buildable-lands counties have taken up this directive directly: Snohomish County grounds its 15 percent vacant/30 percent underutilized factors in a 2005 property owner survey, and Pierce and Thurston Counties likewise tie their factors to observed local data.

Our Question for the Record
What evidence in the current record demonstrates that Clark County's 10 percent, 30 percent and 0 percent assumptions accurately predict what will actually develop over the next 20 years? We are not aware of a recent, documented analysis comparing these specific percentages to Clark County's observed development outcomes, of the kind the 2020 ECONorthwest memo identified as a needed update and the kind other buildable-lands counties have since completed for their own market factors.

Our Request
We ask the Council to direct staff to complete a documented market-factor sensitivity and validation analysis, benchmarked against Clark County's own recent development data, before the County relies on these assumptions for the final land capacity determination underlying this Comprehensive Plan. If the current assumptions hold up, the analysis will strengthen the record. If they do not, the Council will have the chance to correct the capacity findings before adoption rather than after.

Thank you for your consideration. We are glad to provide any additional information that would help the Council and staff complete this analysis.

Respectfully submitted,

Nelson Holmberg
Government Affairs Director
Building Industry Association of Clark County

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