From:	Cnty 2025 Comp Plan
To:	Garrett K. West; Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; James D. Howsley; Darlene Ferretti; Rebecca Messinger
Subject:	FW: Record Submission: Letter regarding Surplus Land Need. Periodic Update (2026-S-14100 and 2026-S-14101)
Date:	Monday, October 12, 2026 10:42:56 AM
Attachments:	image001.png image002.png Ltr to Clark County re Surplus Land Need. 10.12.2026. Submitted.pdf image003.png image004.png image005.png image006.png

Hello Garrett,

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

Confirming this has been received and will be added to the Comprehensive Plan Index of Record. Forwarding to additional staff as well to be shared with the council.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Garrett K. West <Garrett.West@jordanramis.com>
Sent: Monday, October 12, 2026 10:36 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; James D. Howsley <jamie.howsley@jordanramis.com>; Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Subject: Record Submission: Letter regarding Surplus Land Need. Periodic Update (2026-S-14100 and 2026-S-14101)

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Hello Clark County,

Attached is a letter for inclusion into the record for the Periodic Update.

Please reach out if you have any questions.

Thank you!

Garrett K. West | Attorney
Direct: (503) 598-5528

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October 12, 2026

VIA EMAIL ONLY

Clark County Council
c/o Oliver Orjiako, Community Planning Director
1300 Franklin Street
Vancouver, WA 98660
Email: oliver.orjiako@clark.wa.gov
comp.plan@clark.wa.gov

Re: 2025 Comprehensive Plan Periodic Update and Surplus Land Needs

Dear Mr. Orjiako:

This office represents several property owners. They are concerned that Clark County may set aside too little land for housing in the 2025 Comprehensive Plan Periodic Update. This concern applies to proposed Urban Growth Area changes for Vancouver, Ridgefield, Battle Ground, La Center, Camas, and other parts of the County.

The County's current model assumes a 10 percent never to convert rate[1] for residential land and a 30 percent underutilization rate[2]. There was a motion to increase those percentages but it was not adopted. **The present assumptions are too low**. If more land remains unavailable, the **County will not have enough usable land for homes people want and can afford**.

We urge the Council to plan for a 20 percent never to convert factor in new residential UGAs and a 40 percent underutilization factor in already developed residential areas.

The discussion noted that the Housing Options Plan allows accessory dwelling units, middle housing, and greater density on some properties. **These changes may increase housing capacity on paper. But the record does not show whether there is enough market demand for these housing types or how much of that added capacity is reasonably likely to be built during the planning period.** The County should therefore consider both the new zoning options and the continued demand for single-family homes when estimating future housing capacity.

New zoning rules allow more homes in existing single-family neighborhoods, including accessory dwelling units and middle housing. But many owners will choose not to add homes to their property,

[1] A never to convert rate or factor is an allowance for land that is vacant and designated for development, but will not fully develop during the planning period.
[2] An underutilization rate or factor is an allowance for land that is already developed or partially developed, where zoning allows more housing than is likely to actually be built.

and other limits may prevent building. As a result, unused housing capacity will grow. These zoning changes may allow more housing, but they may also lead to a higher underutilization rate.

The following example shows why allowed housing capacity can be much higher than the housing actually built: Assume a neighborhood has 100 homes. Then the neighborhood is rezoned to allow each lot to add a second unit (that's up to 200 homes if each lot builds the second unit). If only 15 lots add a second unit, the neighborhood has 115 homes—not 200—**leaving 42% of the neighborhood's capacity "unused"**.

This is consistent with Councilor Yung's recommendation of 40 percent. A minor error in the underutilized rate will mean a shortage of thousands of housing units of the types and in the locations that Clark County residents are seeking. Given the general housing shortage, the Council should err on the side of securing enough residential land for the housing type that residents prefer; not the types we hope will be built.

State rules recognize that not all developable land will be put to its maximum use because of things such as owner preference, cost, stability, quality, location, and changing market forces. And they do allow local governments to consider their own circumstances when establishing this market factor, as other counties have done.

In 2024, Snohomish County's executive recommendation was for a multifamily vacancy rate of 12.5 percent. Its UGAs have capacity for more than 18,000 more people than needed to hit their adopted growth target in addition to the areas added to the UGA in 2024. In total, its UGAs are about 6.3% over capacity. The county expanded UGAs in 2024 based on employment needs (in Marysville) and needs for specific housing types (Monroe, Bothell MUGA, etc.). One of the UGAs with the largest amount of excess capacity is the Snohomish UGA, which has a growth target of 405 people, leaving it with excess capacity for an additional 1,600 people.

King County similarly provides for a surplus of residential land capacity. For its 2024 Comprehensive Plan, it established Growth Targets and the Urban Growth Area, as shown in the attached report. On pages 11-13 it addresses the targets and capacity for the unincorporated areas of the county (including those that are potential annexation areas and those that are unaffiliated or not identified by a city for future annexation). King County's housing Target is 5,412 new housing units against a capacity of 29,600 (about 546% more capacity than needed).

Kitsap County also provides for surplus residential land. Its Land Capacity Analysis is attached. Page 2 shows that for the Preferred Alternative, the county has excess capacity for 8532 people and a population growth target of 28,825 for 2022-2044. This provides 30 percent surplus capacity.

We urge the County Council to recognize the importance of designating surplus residential Urban Growth Areas because many portions of the designated areas will not develop housing within the planning period for reasons that are beyond the control of county planners and residential developers. The county must aim high to reach the actual target which lies twenty years in the future. **The county should plan for 20 percent vacancy in new Urban Growth Areas and 40 percent underutilization of the zoned capacity in the existing developed residential areas**.

Please include this letter and its exhibits in the record for the 2025 Comprehensive Plan Periodic Update. Thank you for your consideration.

Sincerely,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington