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Subject: Council Hearing Public Comment
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Submitted on Tue, 10/13/2026 - 10:32 AM

Name
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Subject
2025-2045 Comprehensive Plan Update - Comments Ahead of the October 13 Adoption Vote

Date of Hearing
Tue, 10/13/2026

Comment
Crestline Development Group, LLC
PO Box 511
Vancouver, WA 98666

October 13, 2026

Clark County Council
c/o Rebecca Messinger
PO Box 5000
Vancouver, WA 98666-5000

RE: 2025–2045 Comprehensive Plan Update, Comments Ahead of the October 13 Adoption Vote

Dear Chair and Members of the Council:

I am the owner of Crestline Development Group, LLC, a land development consulting firm, and a member of the Building Industry Association of Clark County (BIA). I work directly with property owners, builders, and developers to navigate the land use planning and permitting processes necessary to bring new housing and development to our community.

The decisions made through the 2025–2045 Comprehensive Plan Update will shape Clark

County's ability to accommodate growth and deliver housing that local families can afford for the next 20 years.

I support the adoption of a Comprehensive Plan, but urge the Council to ensure the final plan is grounded in sound, defensible analysis and reflects the real costs of development and their impact on housing affordability.

I respectfully ask the Council to address the following before adopting the plan:

1. Validate the land capacity assumptions before relying on them for 20 years. The Vacant Buildable Lands Model applies never-to-convert assumptions of 10 percent for vacant residential land, 30 percent for underutilized residential land, and 0 percent for commercial, business park and industrial land. We have not seen evidence that these percentages have been tested against what has actually developed in Clark County. If they overstate buildable capacity, every urban growth area and zoning decision built on them is less reliable, and harder to fix after adoption than before. Please direct staff to complete a documented market-factor sensitivity and validation analysis before the final capacity determination is relied upon.

2. Consider the combined cost of new fees - and who ultimately pays them.. Higher school impact fees, new fire district impact fees, and higher land use and wetland review fees were approved separately within weeks of one another. The Council should see the stacked total per home, not a series of isolated votes. Builders and developers write the check at the permit counter, but the homebuyer pays the bill, in the price of the home and in the mortgage they carry for decades. We also ask the Council to confirm that the new fire district fees rest on a clear showing that each charge is tied to the cost of growth-related fire service impacts.

3. Size urban growth area expansions to real, near-term demand and available infrastructure. Battle Ground, Camas, La Center, Ridgefield and Yacolt each have expansion requests in this plan. Each should be judged on demonstrated housing need and existing or funded infrastructure, not treated as a one-time opportunity to add land regardless of how much the market can absorb. Oversized or misplaced expansions can lock up land in the wrong places for two decades while under-serving the places where housing is actually needed.

4. Make sure permitting and infrastructure capacity keep pace with planned growth. Capacity on paper means little if permit review timelines, water and sewer capacity, and roads cannot support the development the plan assumes. Every month a project waits in review adds carrying costs that ultimately land on the buyer.

5. Keep the County’s middle housing code consistent with the cities’. The County’s Housing Options Study and Action Plan governs unincorporated urban growth areas, while HB 1110 separately governs the cities. If standards, densities or review processes diverge meaningfully across the line, builders face different rules project to project and buyers face uneven housing choices. We ask the Council to confirm the County’s code aligns in substance with what its cities are required to do.

6. Build in a way to correct course. If the assumptions behind this plan turn out to be wrong, the County should not have to wait a full planning cycle to find out. Please include a defined monitoring and mid-cycle review trigger tied to actual permit and absorption data.

7. State the affordability impact before you vote. Every fee increase and every acre of

constrained capacity has a measurable effect on the cost of a home. We ask that the effect be stated plainly in the record for the decisions that make up this plan, not just discussed in general terms.

We are not asking the Council to delay or reject the Comprehensive Plan. We are asking that the record and the methodology be strong enough that the plan stands up to review and to the next 20 years without reopening these fights.

Thank you for your service and for considering these comments. I would welcome the opportunity to share more about my experience with you or your staff.

Respectfully,

Ingrid S. Bradley
Owner | Crestline Development Group, LLC
Member, Building Industry Association of Clark County



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