

**Analysis and Advised Response to Local Application of the Growth Management Act
(RCW § 36.70A)**

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Introduction and Revision by Sydney K. Tucker

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No Artificial Intelligence was used to write, compile, or calculate any portion of prose or data in this report. Artificial Intelligence was used sparingly as a research tool to identify sources to then explore without the use of AI.

For revisions, author Jude A. Helmes worked directly editor Sydney K. Tucker.

Introduction

Over the past 15 years, the housing market in Clark County, Washington, has seen rising prices for consumers. The causes of increased housing prices stem from microeconomic factors such as increasing regulatory burdens and supply and demand dynamics of land and labor, as well as macroeconomic factors such as increasing costs of borrowing. Concurrent with rising housing prices, the Growth Management Act (GMA) of 1990 introduces other concerns about sustainable housing initiatives in Clark County. Under Washington State House Bill 1220, Washington counties are required to apply the GMA. The GMA requires Washington counties to plan for housing and population growth by setting urban growth boundaries and designating critical areas for wildlife and natural resources protection. Additionally, the GMA requires Washington counties to create comprehensive plans to address problems associated with increased housing demand and growth long term.

Thus far, there has been little formal evaluation of the effectiveness of Clark County's growth management. The tension between rising housing prices, rapid growth, and environmental concerns and priorities within Clark County presents a challenge for the public and private sector alike. In May of 2026, I was hired as a research analyst intern by the Building Industry Association of Clark County to produce a report that explores the state of growth management in Clark County. My dual background in finance and environmental science from my undergraduate studies allowed me to bring a unique perspective to the housing challenges

Clark County faces. This report examines the factors that contribute to current housing issues in Clark County as well as viable solutions for consideration.

The issue of rising housing costs in Clark County presents ongoing implications for the housing opportunities and quality of life of county residents and therefore necessitates immediate attention. A combination of data analysis and application of economic theory provides the strategy for addressing the housing crisis while adhering to the stipulations of the GMA. Clark County Planning has interpreted data from the Washington State Department of Commerce Housing for All Planning Tool (HAPT) to inform the approach for application of the GMA thus far. Current County Planning data interpretations encourage a strategy for addressing housing needs that fail to attend to key growth issues and leave the county with inadequate housing to serve its growing population. Inaccurate grouping of income bands and misunderstandings of the type of product buyable, as well as a failure to grasp the cost implications of buildable lands, have encouraged the county to overemphasize multifamily developments such as high-rise apartment complexes. Data interpreted from the U.S. Census Bureau alternatively suggests that middle-income products such as cottages, townhomes, condominiums and multiplexes are best suited to address Clark County's housing needs. Shortages of accurately supplied housing result from insufficient collaborative work between private and public sectors and the absence of a framework to carry out such collaboration.

With these issues in mind, I present strategies to correct the present housing situation in Clark County. These recommendations consist of pragmatic solutions to housing problems but center around a theme of collaboration between the private and public sectors. Effective solutions to Clark County's housing crisis will derive from a collective force that integrates expertise from builders, planners, developers, and numerous other components of the housing

industry. With such a spirit of collaboration in mind, forming a county Housing Commission should take priority as a mode of addressing the ongoing housing crisis.

Data Analysis

The growth planning decisions made by Clark County are guided by data sourced primarily from the Washington State Department of Commerce, as well as internal county reports. Data examined in this report was sourced from the United States Census Bureau reports B19001 and B25085, as well as numerous County Council Work Session documents that feature snapshots from HAPT, which is generally regarded as a powerful tool with accurate data. (Orjiako, 2025). Although some components of the HAPT model generate disagreement (such as projecting income migration patterns and how wealth might change as a result of homeownership), these concerns are beyond the scope of this report. Issues arise in the misapplication of HAPT data due to poor interpretation and organization rather than due to inaccurate data.

To understand misleading data interpretations, different visual data presentations are compared below. Clark County features a heterogeneous socioeconomic demographic that allows for a wide range of alternative data groupings. Graphical choices contribute to differing conclusions based on the same dataset as demonstrated by Figures 1, 2 and 3. As seen in Figure 1, the county's lower income groups are spread over a far larger range (\$0 to \$44,99 with grouping intervals every \$5,000) than the medium income groups (\$45,000 to \$75,000 with grouping intervals every \$10,000 or \$15,000). The approach used in Figure 1 organizes the income bracket data by grouping the lower income segments together to represent population buckets of equivalent (or measurably comparable in terms of another factor such as median income) size. Subjectivity and goal-determined discretion may influence how these segments are

grouped. If a party is interested in presenting data that indicates that low-income housing is not a major need within the county, they may choose to group the income buckets in a way that minimizes the size of the lowest income groups (see Figure 2). Alternatively, if a party aims to present data that indicates that low-income housing is a major need for the county, they may group the income brackets to include an even higher range of households (see Figure 3).

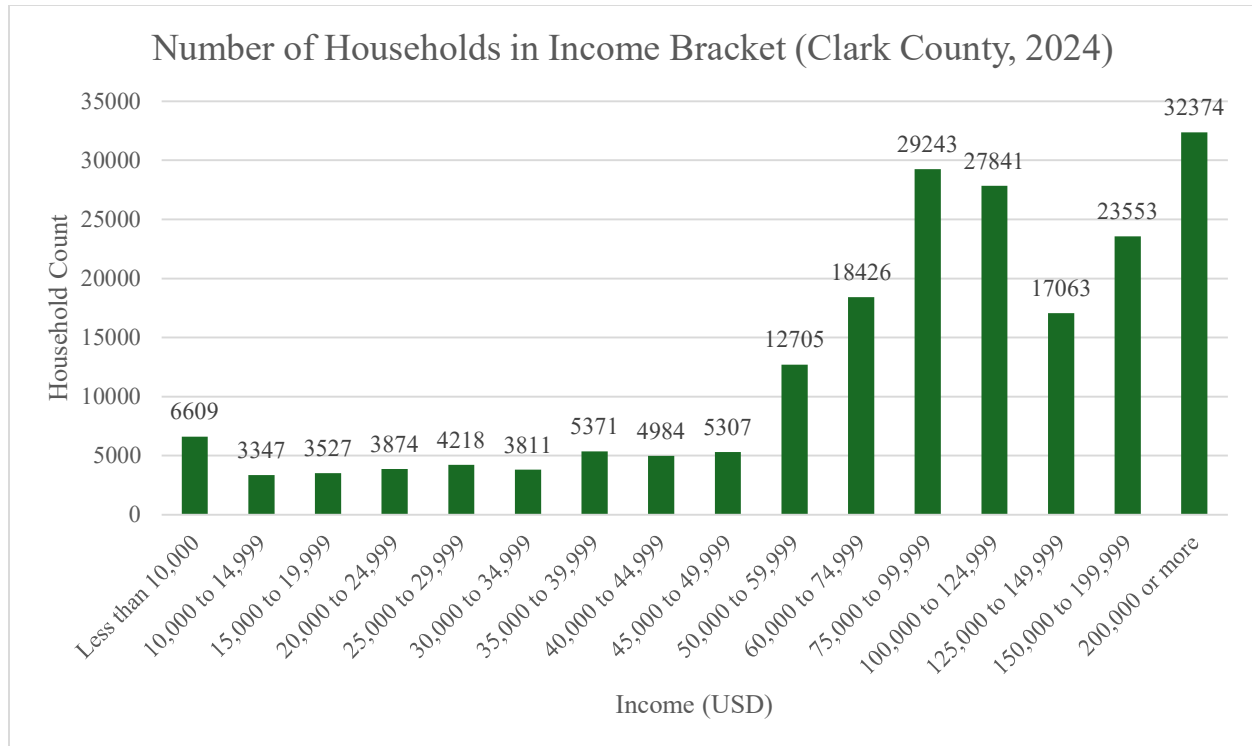


Figure 1: Number of Households in Income Bracket (Clark County, 2024). The bar chart shows the number of households that fall within the income buckets that cover the spread of Clark County. Data sourced from USCB B1900.

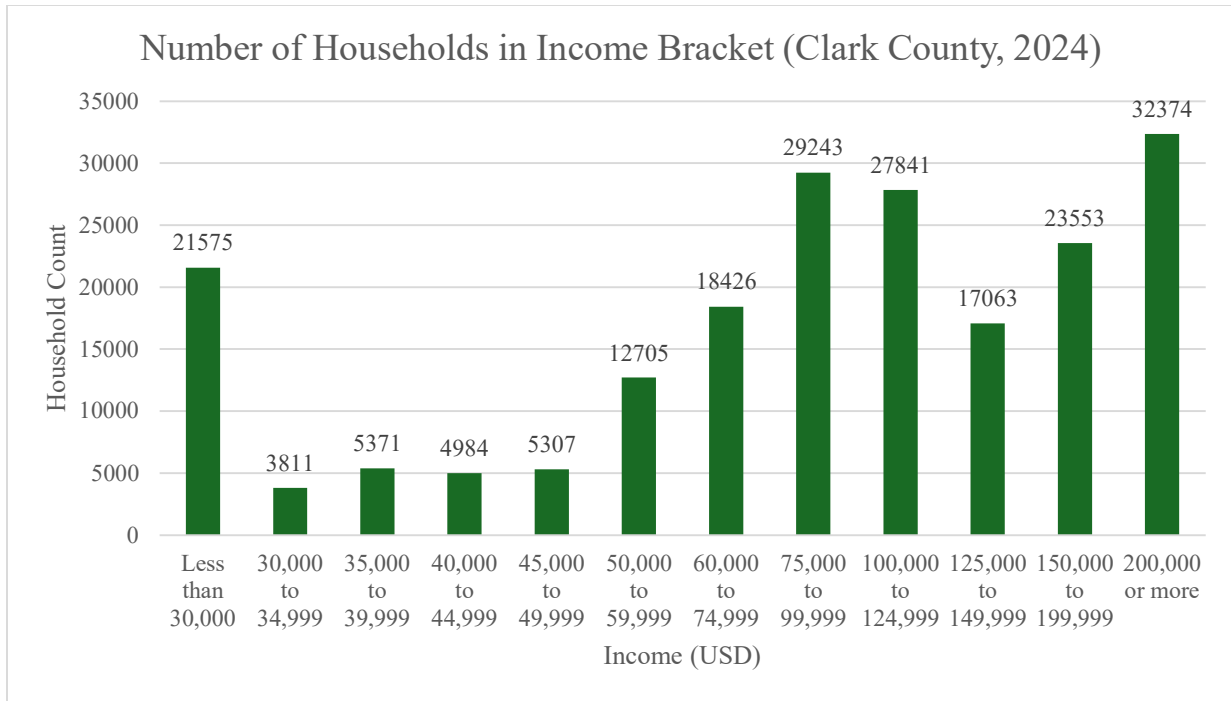


Figure 2: Number of Households in Income Bracket (Clark County, 2024). This chart serves as an illustration of how parties interested in presenting low-income earners as a relatively insignificant portion of Clark County's population might display income data. Data sourced from USCB B1900.

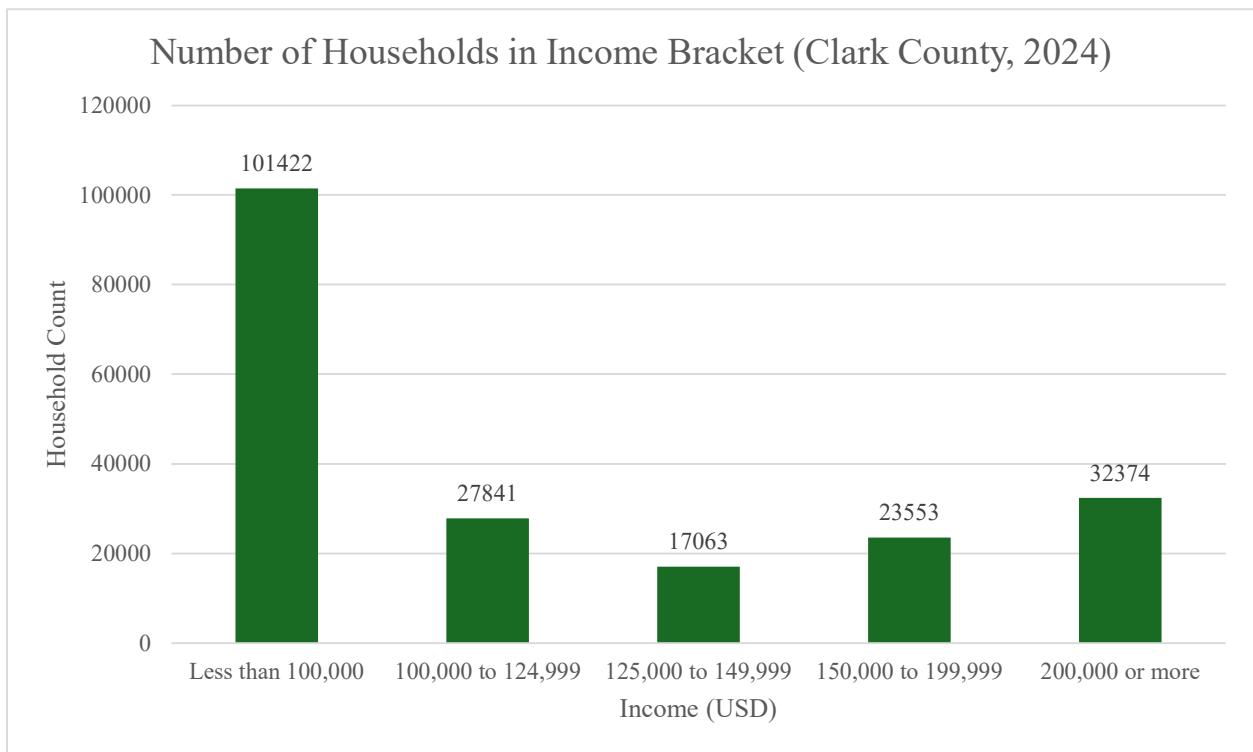


Figure 3: Number of Households in Income Bracket (Clark County, 2024). This chart serves as an illustration of how parties interested in presenting low-income earners as a significant portion of Clark County's population might display income data. Data sourced from USCB B1900.

Projected Housing Units by UGA and Income Band

Population Target=718,154		Permanent Housing Needs by Income Level (% of Area Median Income)						Emergency Housing
	Total	<80%		>80 - 120%		>120%		
Vancouver Unincorporated + Rural Clark County	44,036	26,550	60%	6,857	16%	10,629	24%	1,734
Battle Ground city+UGA	6,979	3,426	49%	1,423	20%	2,129	31%	237
Camas city+ UGA	4,226	2,661	63%	765	18%	799	19%	172
La Center city+UGA	2,123	1,050	49%	405	19%	667	31%	66
Ridgefield city+UGA	5,815	4,136	71%	1,213	21%	466	8%	219
Vancouver city	36,527	13,833	38%	6,340	17%	16,355	45%	1,405
Washougal city+UGA	3,735	1,962	53%	741	20%	1,032	28%	143
Woodland city+UGA	105	47	45%	22	21%	35	34%	3
Yacolt town+UGA	150	23	15%	38	25%	90	60%	7
Total 2023-2045	103,695	53,687		17,805		32,202		3,986
Percent of Total		52%		17%		31%		NA



Figure 4: Clark County Community Planning Projected Housing Units by Urban Growth Area (UGA) and Income Band, grouped.

Discrepancies in data formatting based on the grouping or ungrouping of certain income bands are reflected in Clark County Community Planning's official presentations. In the official November 2025 County Council Planning Session presentation, a table shows the projected housing units needed based on percentage of Area Median Income (Figure 4). It is important to note that Figure 4 is not the exact same dataset as referenced in Figures 2 and 3, as Figure 4 illustrates the housing needs that are a result of population growth, rather than representing the populations themselves. Nonetheless, the data in Figure 4 represents a related situation, as projected housing units are directly correlated to area demographics. The same presentation from Clark County's Community Planning Session features another chart with the exact same data (Figure 5) but presented in a format that illustrates the range of <80% AMI demographic groups. The differences in data presentation in Figures 4 and 5 parallel the differences in Figures 2 and 3, which demonstrate how the significance of certain segments can be overemphasized by grouping strategies. Just as Figure 3 represents the data in Figure 1 in a way that amplifies the needs of the

lower income groups, Figure 4 represents the data in Figure 5 in a way that inappropriately combines a wide range of income groups (with a wide range of needs) into one group.

Projected Housing Units by UGA and Income Band

Population Target=718,154		Permanent Housing Needs by Income Level (% of Area Median Income)						
	Total	Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%
Vancouver Unincorporated + Rural Clark County	44,036	5,583	3,292	7,611	10,063	4,412	2,445	10,629
Battle Ground city+UGA	6,979	685	444	1,120	1,177	502	921	2,129
Camas city+ UGA	4,226	564	331	811	955	516	249	799
La Center city+UGA	2,123	211	124	311	404	234	172	667
Ridgefield city+UGA	5,815	744	413	1,167	1,812	698	515	466
Vancouver city	36,527	4,641	2,600	5,227	1,365	1,459	4,881	16,355
Washougal city+UGA	3,735	390	267	523	781	417	324	1,032
Woodland city+UGA	105	8	6	13	20	12	11	35
Yacolt town+UGA	150	26	14	(5)	(12)	2	36	90
Total 2023-2045	103,695	12,852	7,490	16,779	16,565	8,252	9,554	32,202
Percent of Total		12%	7%	16%	16%	8%	9%	31%

Figure 5: Clark County Community Planning Projected Housing Units by Urban Growth Area (UGA) and Income Band, ungrouped

The grouping of data as shown in Figure 4 featuring percentages of each housing income type by jurisdiction (+Urban Growth Area) may have attempted to accurately present unified data: a segment for less than 80% Area Median Income (AMI), a segment for 80%-120% AMI, and a segment for greater than 120% AMI. Other county planning documents (such as the presentation for the Clark County Planning Commission's October 2, 2025 Work Session) provide context for the established group boundaries. The delineation of groupings featured in Figure 6 is identical to that of the November 2025 work session presentation, and thus displays the reasoning behind the county's grouping featured in Figure 4, identifying unit types based on AMI percentage.

20-year Housing Needs in Clark County

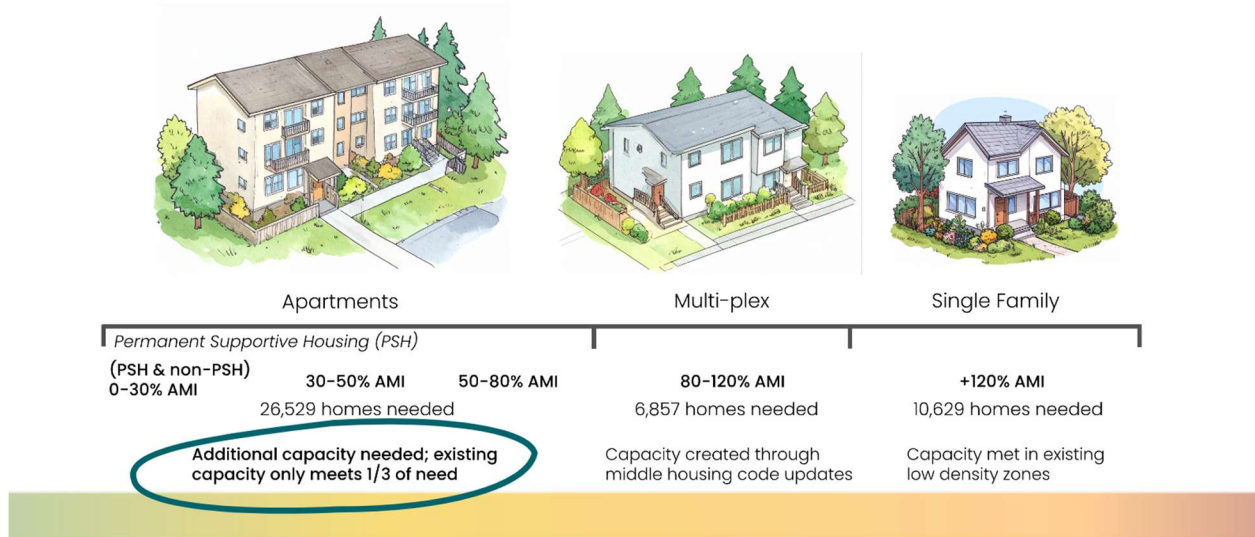


Figure 6: Clark County Planning Commission Presentation Slide featuring housing types (Apartments, Multi-plex, and Single-Family) and need estimates of AMI groups.

Notably, the “homes needed” numbers in this presentation do not match those presented in the state’s HAPT model and the statement “Additional capacity needed; existing capacity only meets 1/3 of need” is erroneous and disputed by the HAPT model. The images in the upper portion of Figure 6 emphasize the unit types for each AMI group. The AMI bands appear to correlate with a perceived affordable unit type that can serve as justification for policy to encourage certain unit types. Indeed, policy and code adjustments proposed to Clark County Councilors by consultants at JET Planning aim to dramatically upzone Urban Medium and Urban High Zones (see Appendix 1), pushing for the creation of a greater volume of apartment-specific housing.

These shifts are justified by data grouped based on likely affordability of unit types. In-depth data analysis shows that Clark County has erred in the grouping of units based on affordability—both in regard to most affordable unit type and feasibility of unit affordability without subsidization. The problem with grouping all <80% AMI income bands together is that

the bands within that group can afford different product types. Importantly, there is a reasonable segment of this group whose affordability status would suggest that their best housing option would be to rent a unit in an apartment complex. However, that proportion is not necessarily the majority of the <80% AMI group. Using data from United States Census Bureau reports B19001 and B25085, one can compare the number of individuals from a specific income band with the number of vacant on-market homes that is affordable to that income band specifically.

The first step in developing a tool to compare income-correlated housing units on-market was to create groups in which each income bucket could be placed. To do so, housing, income, and population data were correlated by income group via housing price estimation and availability. This model was named the Dynamic Income-correlated Housing Affordability Model (DIHAM). For the sake of simplicity and consistency, the groups in this new model were not based on percentage of AMI, but rather on quintiles of households within the population. Each quintile (Q1-Q5) represents 20% of the population, with Q1 representing those households in the bottom 19.99% of earners, Q2 representing the 20th-39.99th percentile of earners, Q3 representing the 40th-59.99th percentile of earners, Q4 representing the 60th-79.99th percentile of earners, and Q5 representing the 80th-100th percentile of earners. Note that each quintile varies slightly from exactly 20% depending on the size of income buckets grouped to that quintile, as US Census Bureau data does not allow for exact measurements of each household's income. Nonetheless, these quintiles are roughly equal and any statistic associated with them can be normalized for exact population counts, resolving any concerns of data accuracy based on grouping.

An established grouping of incomes provides a statistical reference point from which to then attribute home listing prices. The DIHAM utilized front-end ratio driven price calculators to

determine the relationship between income and home purchasing ability. For this model, Redfin’s “How Much Can I Afford?” calculator (Redfin, 2026) was chosen for its incorporation of local taxes and insurances, private lending insurance, debt ratios, non-housing expenses, and integrated database of local home prices. Notably, Redfin’s delivered count of units in region based on outcome price affordability was not used in this model, as it presented a conflict of interest (Redfin’s business of selling homes) and thus was not a reliable portion of that data. With the delivered count of units in region data excluded, the calculator is regarded as a highly effective and unbiased tool. Based on calculations of affordability from Clark County’s income data from the US Census Bureau, the census-designated income buckets (and thus the corresponding quintile groups) are matched to counts of vacant units on the market. From these matches between income buckets and vacant units, the DIHAM can indicate how many units are available for ownership for each income quintile (Figure 7).

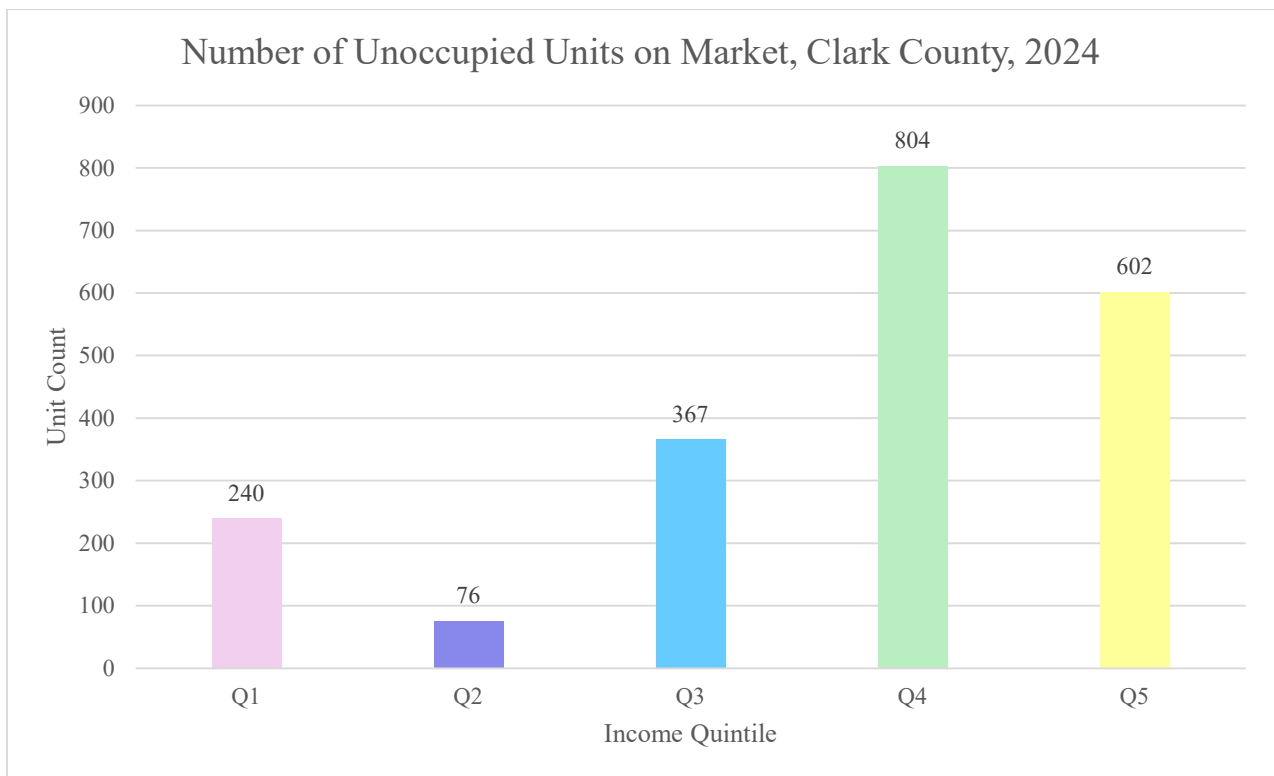


Figure 7: Number of Unoccupied Units on Market by Income Quintile in Clark County, WA. See appendix for full table.

The data presented in Figure 7 suggests an interesting problem in Clark County. While it is typical to have fewer units available in Q1 due to price range being too low for common owner-occupied products, the Q2 shortage is historically abnormal. Figure 8 illustrates the decline in Q2 units observed in the last 10 years (following a revival in the recovery of the 2007 market crash and 2008 Great Recession), and Figure 9 illustrates how this same trend is represented in terms of number of potential Q2 buyers for each available Q2 unit.

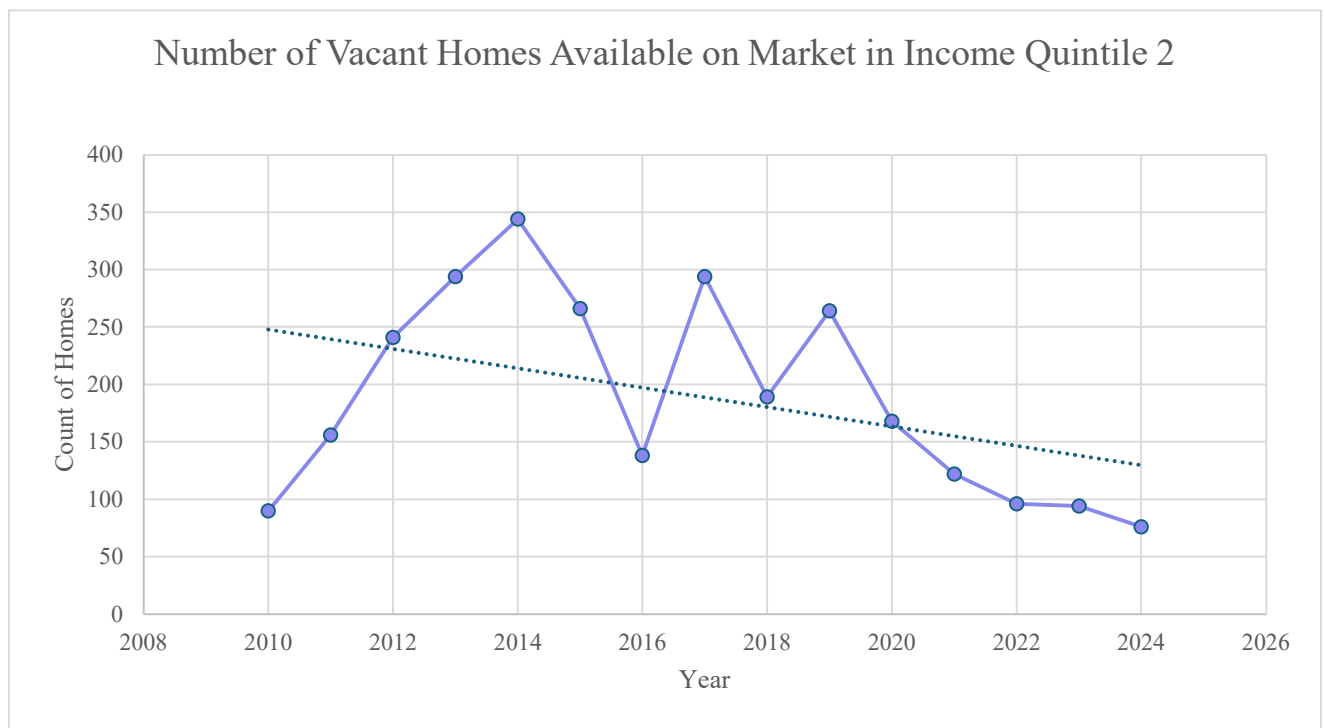


Figure 8: Number of Vacant On-Market Homes Purchasable to Income Quintile 2 Residents of Clark County, 2010-2024.

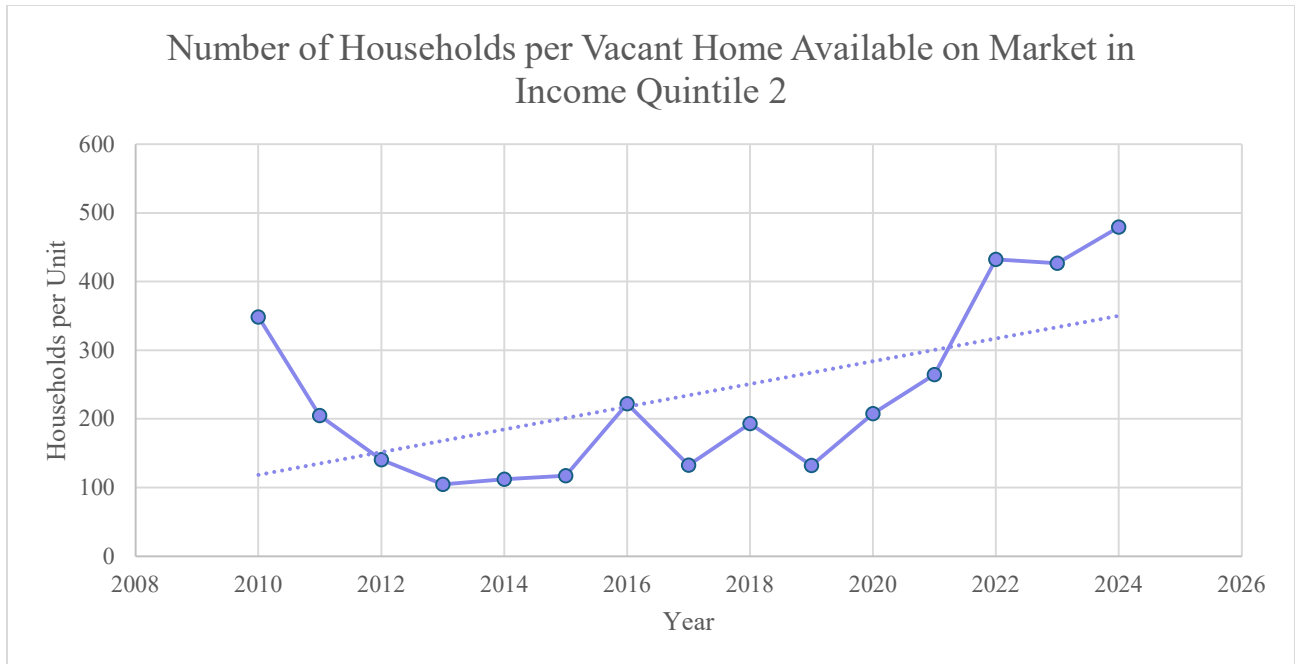


Figure 9: Number of Income Quintile 2 Households per Vacant On-Market Home Purchasable to Income Quintile 2 Residents of Clark County, 2010-2024.

The data on Q2 incomes and vacant on-market homes, which is the oldest of its classification provided by the US Census Bureau, indicates that the contemporary Q2 market is indeed abnormal. The linear trendline in Figure 9 shows that on average, the number of households in Q2 per on-market vacant home has tripled in the last 15 years. The majority of this change is influenced by a post-COVID surge that has not showed signs of rebalancing. As the trend continues, Q2 households face fewer attainable options for homeownership in the housing market.

The DIHAM also identifies the price range specifically excluded from the market (See Appendix 2). Based on this model, the price range absent from the market is roughly between \$160,000 and \$300,000. Putting this range in conjunction with the home asking price data, it is apparent that homes in Clark County priced between \$160,000 and \$300,000 are currently unavailable in the market, and that this trend is abnormal for the county.

As homes become unavailable in the market, it is important to examine alternatives to homeownership. Although there are numerous benefits to homeownership (Habitat For Humanity, 2026), as well as a general preference for single-family units (Potts et al., 2024), it is important to inspect all alternatives to adequately consider the full housing market. The most obvious option is apartment rental, which is the target of numerous growth plans throughout the nation. Comparing income data and grouping with observed rental prices in the county assesses the ability of Clark County residents to rent apartments within the county. Local data of the bottom quartile price for each unit type from Rentometer, Inc (2026). and household income data from US Census Bureau B19001 highlights the affordability of each income bucket (and thus the quintile into which the income buckets are grouped). Average monthly housing expenditure capacity can be calculated by taking the average of income in each bucket, dividing this number over 12 months, and multiplying it by 28%, the recommended housing expenditure income ratio (Table 1). The outcome of these calculations is somewhat startling: None of Q1 and only part of Q2 can afford an unsubsidized apartment in Clark County. Although the bottom quartile price is not representative of the absolute lowest possible price of a product, the price does indicate the standard low-end price for a product in that unit type and reflects the most attainable product for the majority of people. Renting an unsubsidized apartment is generally unattainable for any given household in Q1.

Table 1: Modified DIHAM Table shows a range of income bands, grouped into quintiles of equal population, correlated to maximum rent and unit availability as well as maximum affordable home price.

Income (USD)	Maximum Affordable Monthly Rent/Mortgage Payment (USD)	Largest Unit Type Available (Based on Bottom Quartile Property Type Price(Rentometer, Inc.))	Maximum Affordable Home Price (USD) (Based on RedFin "How Much Can I Afford?" Calculator)	Price Ranges (quintiles Aproxiamately correlated with Household Count quintiles via Income Cutoffs)
Less than 10,000	116.66	None	\$ 15,857.00	Income quintile 1
10,000 to 14,999	291.66	None	\$ 34,340.00	
15,000 to 19,999	408.32	None	\$ 52,823.00	
20,000 to 24,999	524.99	None	\$ 71,311.00	
25,000 to 29,999	641.66	None	\$ 89,794.00	
30,000 to 34,999	758.32	None	\$ 108,277.00	
35,000 to 39,999	874.99	None	\$ 126,760.00	
40,000 to 44,999	991.66	None	\$ 145,243.00	
45,000 to 49,999	1,108.32	None	\$ 163,727.00	Income quintile 2
50,000 to 59,999	1,283.32	Studio	\$ 200,693.00	
60,000 to 74,999	1,574.99	1 Bedroom	\$ 256,143.00	Income quintile 3
75,000 to 99,999	2,041.66	3 Bedroom	\$ 348,559.00	Income quintile 4
100,000 to 124,999	2,624.99	3 Bedroom	\$ 440,975.00	Income quintile 5
125,000 to 149,999	3,208.32	3 Bedroom	\$ 533,390.00	
150,000 to 199,999	4,083.32	3 Bedroom	\$ 718,222.00	Income quintile 5
200,000 or more	4,666.67	3 Bedroom	\$ 903,054.00	

Although Q2 earners have a better prospect at affording an apartment rental in Clark County than Q1 earners, the DIHAM indicates that Q2 earners would likely still struggle to afford adequate housing space via an apartment rental. Studio and single bedroom units (the likely affordable unit type) rarely provide sufficient space to house a family. Even with an increase in unit supply, unsubsidized apartment units will not adequately serve families in Q2, as both price and size continue to be limiting factors. Alternatively, home ownership presents a viable option for Q2 and Q3, which would alleviate market pressure on apartments for Q1 housing. Table 1 not only illustrates apartment rental capability, but also matches income bands with specific home prices sourced from RedFin's calculator. As shown in Table 1, groups that might struggle to find adequate space through apartment rentals could feasibly afford older

middle-housing units and newer budget-conscious middle-housing units if such units were available on the market. For example, an earner in the upper half of Q2 could potentially only afford a one-bedroom or studio apartment but could find a unit in the realm of \$250,000 for home ownership. Units at this price point are currently less available on the market (see Figure 8) but could offer an important facet of the solution to Clark County's projected housing shortage should more units of that nature be constructed. Alternatively, units of a slightly higher price could be constructed, forcing downward price pressure on older units from Q3 into Q2.

Unsubsidized rental fails to offer affordable housing opportunities to the majority of Q1 and Q2 earners, limiting rental as a viable means to independently increase housing in Clark County. It is therefore critical to incorporate owner-occupied units into plans for meeting housing demand in the coming decades. Price, consumer preference, and size indicate that efficiently designed single-family units including detached houses, attached houses, cottages, and condominiums will play major roles in achieving adequate housing supply for Clark County.

Data Implications

There are numerous implications that arise from the data analysis indicating that Clark County lacks homes in the \$160,000 - \$300,000 range. In Clark County, the housing unit type range incorporates a wide array of homes: older properties that are single-family detached, newer single-family detached properties in cottage styles, condominiums, multiplexes, and townhomes. Although Clark County offers a wide range of product types, the range or volume of supply could be increased still, either through direct construction of product within the range or through an influx of product in a slightly higher price range. These marginally more expensive units would drive prices of quality-maintained older units in the slighter higher price range down into the sub-\$300,000 price range. This trend in supply-influenced downward price-pressure is not

just of economic a priori theory, but also an observed pattern in American housing (Rappaport, 2007).

Should housing supply meet demand, the majority of households in Q2 and higher-earning quintiles could feasibly afford homeownership in Clark County. With housing needs met, Clark County has high potential for income mobility and a wide range of income classes to build generational wealth (Habitat for Humanity, 2026). As the County reconciles the national issue of increasing income inequality (Peterson Foundation, 2026) and explores methods of combatting the trend at a local level, home ownership for lower income bands must be prioritized.

Another important observation of the explored data is that Income Quintiles 1 and 2 are far wider in range than Quintiles 3, 4, and 5. As explored in the data analysis portion of this report, this wide-range trend leaves Q1 and Q2 vulnerable to data presentation manipulation. The explored housing data evidence that there is no singular option to address housing for this 40% of Clark County's population—the income range is simply too diverse to address through measures targeting a singular property type (whether that be multifamily, middle housing, single family, or any other number of alternatives). Instead, a targeted, calculated effort must be made to ensure that the most beneficial options for these groups are possible. Not only is such an effort important for providing equitable opportunities for all of Clark County's residents, but it is also important for securing quality infrastructure for all County residents.

Home values and tax revenue are correlated with (and often the immediate price-respondents of) the development of new housing. While infill housing has often been culturally stigmatized as lowering neighboring home values (Puustinen, 2018), research indicates that the opposite is actually true. Leaving infill land empty tends to hurt home values and lower tax bases—and even drive businesses out of regions (Felt, 2007). Using infill land as space for entry

level homes provides opportunity for growth for potential new homeowners. This is especially important as these opportunities for new homeowners have become less available over the last decade.

The time series analysis (Figures 8 and 9) indicates that since the early 2010s, the Clark County housing market for Q2 has become worse. It is difficult to parse between local and non-local business trends, as well as micro- and macroeconomic trends, to assign specific percentages of responsibility for an increase in price. However, industry insiders have the insight needed to clarify the drivers of price increases. Through interviews conducted with home builders, buyers, regulators, and political activists, the most observed trends have been an increase in land prices, a difficult lending environment, and regulation. A good indicator of the trend in land prices comes from the dramatic increase in home values that are built on acreage, as opposed to non-acreage. In 2025, acreage homes in Clark County appreciated 3.5% in year-over-year value, as opposed to the statewide pace of 0.5% pace (Ritz, 2026). This higher appreciation rate indicates that properties in Clark County are becoming more valuable substantially quicker than the surrounding regions, and that the trend is accelerated when land is a higher proportion of the value of the property. As land becomes more valuable in Clark County, new homes absorb larger amounts of this cost than in prior market eras. The trend suggests that the local market characteristics are at least partially responsible for the increase in home prices in the county—and thus the steady pricing-out of Q2 buyers.

Cost Analysis

Cost analysis of bringing a home to market can be a difficult task due to the wide range in variability for expenses in the construction industry. A general base scenario reflective of the current market can be developed by analyzing data from local builders. For the current analysis, multiple home builders were consulted on costs for different projects before costs were averaged to create a market-average model. To prevent sharing sensitive cost data with competitors, these builders are left anonymous throughout the current report.

The first consideration is the hard cost of construction. Hard cost is generally given in dollars/ft² and can therefore be extrapolated to similar projects and compared over time. Although displayed as a singular number in the simplified cost sheet (Table 2), hard costs are the sum of dozens (if not hundreds) of factors, many of which are highly variable. The most significant of these costs are the price of raw materials and of labor, but many other factors also contribute in smaller ways. Interview responses from builders indicate that for smaller, budget-conscious projects, the cost per square foot sits at around \$130.00. For a 2,000 ft² home (likely sitting on a lot around 2,300 ft²), this equates to \$260,000.00. For reference, the average new townhome in the United States is about 2,300 ft² (Rocket Mortgage, 2026). Based on these calculations, the hard cost of constructing an entry-level home in Clark County already usurps the majority of potential available spending for most Clark County households.

Unfortunately for consumers, the hard cost of constructing a home is only a fraction of what the actual cost to bring a home to market. The largest of what are known as “soft costs” (non-direct-construction costs) is the lot cost. Most builders interviewed reported that one of the biggest changes they observed in the Clark County market over the last 5-10 years has been a surge in lot prices, which is important to note when considering the effects of land availability

policy. In the case of a 2,000 ft² home, a typical lot to support this unit currently costs around \$155,000.00 according to local builders. Regulatory costs also contribute to soft costs, including impact fees, services, and permitting. These costs vary based on where in the county a home is built, as various jurisdictions have different impact fees and local permitting offices have a range of costs and efficiencies. Such variance has been a source of frustration for builders, some of whom noted that inconsistency in fees and regulations across the county have driven up costs through the inability to replicate operational systems in different areas.

Other costs that result from the business operations necessary to bring a home to market include loan financing (which is worsened by delays in construction), closing costs such as title company fees or lender fees, incentives to subcontractors to complete projects on time and at a high quality, and overhead costs for maintaining company operations. In the average Clark County model for a 2,000 ft² home, soft costs total at roughly \$290,000.00. Combining soft costs and hard costs, the total cost of bringing a 2,000 ft² home to market amounts to \$550,000.00. A builder that can produce enough homes in a year to afford slimmer margins can expect a sales price of \$577,500.00. An unfortunate consequence of the economies of scale associated with building firm size is that smaller local firms face an inherent disadvantage to larger regional or national firms with the ability to build at scale, as such larger firms can spread overhead costs over more units to reduce overall price. These lack of scale issues for smaller firms that can be exacerbated by increasing soft costs, disincentivizing home buyers to support local businesses and reducing the capacity of local home builders to remain competitive in the market.

Table 2: Simplified Cost Sheet Average For a 2000 square foot home in Clark County, WA, in 2026, based on interview data from local builders.

Home Size SqFt	2000.00
Direct Construction Cost per SqFt	130.00
Total Direct Construction Cost	260,000.00
Hard Cost subtotal	260,000.00
Lot Cost	155,000.00
Impact Fees, Services, Permitting	45,000.00
Loan Financing	20,000.00
Closing Cost	30,000.00
Incentives	15,000.00
Overhead	25,000.00
Soft Cost subtotal	290,000.00
Cost Total	550,000.00
Sales Price	577,500.00
Profit Margin	5%

Policy Analysis

Through planning sessions, legislative action and application, and municipal code adjustments, Clark County and its municipalities continue to support building environments that are not conducive to the stated goals of the county government, the aspirations and ideals of the residents, and the livelihood of the home building industry at large. The Clark County Comprehensive Plan (2015) aims “to make adequate provision for existing and projected housing needs of all economic segments of the community.” Notable Framework Plan Policies include 2.1.0 “Housing options in the county include single family neighborhoods and mixed use neighborhoods ... townhouses, multi-family developments, accessory units, boarding homes, cooperative housing and congregate housing”, 2.1.6 “Encourage infill development that

enhances the existing character and provide a mix of housing types in all urban and rural centers. All cities and towns are to encourage infill housing as the first priority for meeting the housing needs of the community”, and 2.1.7 “develop demonstration projects to assist the private sector to achieve infill goals.” The code updates proposed in the 2025 Comprehensive Plan Update, which propel the aim to “Focus permitted uses on multifamily dwellings exclusively, eliminating single-family detached, duplexes and townhouses as permitted uses” (Decker, 2026) in medium and high-density zones, are not conducive to these ends.

First, one must understand Clark County’s strategy for calculating vacant buildable land, as the strategy drives policy approaches to zoning and urban expansion. To the credit of the county, the methodology for identifying the actual acreage of land available to build on is comprehensive (see Figure 10). However, as most builders and developers would note, the arguably most important factor in determining if land is truly “buildable” – cost – is absent from the methodology. Although the methodology integrates a “market factor” of 10% project failure for vacant lands, the actual dynamic effects of market variability are absent (Department of Community Planning, 2022). Considering the stated goal of the county to provide housing opportunities for all economic bands, it is counterintuitive to neglect cost as a factor from considerations of buildable land. In periods of minimal land availability as presently faced in most Clark County jurisdictions, price of land often becomes a limiting factor in providing affordable product for lower income bands. Not all acres are comparable in value or desirability. As a product of this variation in desirability, fewer products are built. This is due to a phenomenon diagramed in Figure 11, in which higher value land zoned for denser multifamily product goes unbuilt, and lower value land zoned for a range of product is built, but due to its reduced capacity is unable to meet demand. Lower value land may also end up being used for

larger builds that have greater profit margins than smaller, more affordable builds, leading to a situation where equitable opportunities for housing are no longer possible. Even households who are able to purchase a home built on a less desirable lot will likely see less appreciation in value due to an undesirable location. While multifamily development is an important portion of growth management, zoning large swaths of vacant land for this development type leaves the county and its builders and developers in a difficult position. Those who are perhaps most harmed by this trend are citizens in Q2, who will likely lose out on opportunities to own a home to those in Q3 and Q4, as limited supply will price them out.

This concept is not new and has been observed in housing trends for decades. Indeed, Ding et al. described in 1999 that leaving out continuous infrastructure investment to urban growth boundaries leaves land too scarce (and thus expensive) to effectively improve social welfare. As Ding et al. writes, “efficiency is enhanced by coordinating expansion in the UGB and investments in infrastructure” (67). Unless substantial public investments are made to ensure affordable housing prices, the development will be inefficient. Ding et al. also observed that “an efficient path of urban growth can be achieved by pricing the public good at marginal cost.” (Ding et al., 66). This principle comes as a reminder to Clark County that land expansion should

be considered in terms of marginal cost and benefit to each expansion, rather than simply considering the potential harm associated with expansion.

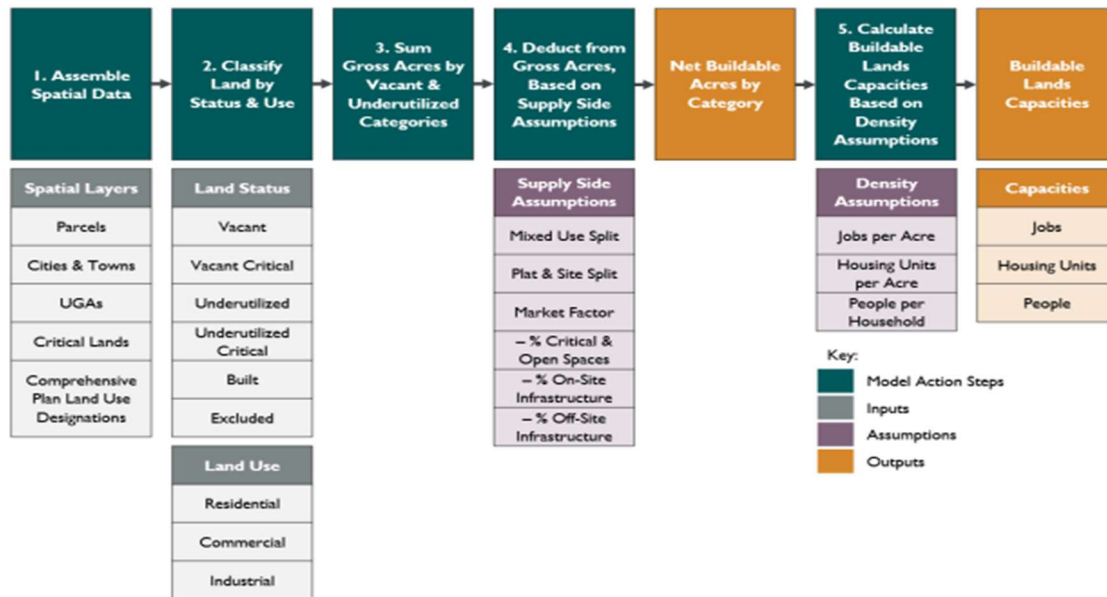


Figure 10: Clark County methodology for calculating vacant buildable land capacity of jurisdictions. 2022 Buildable Lands Report.

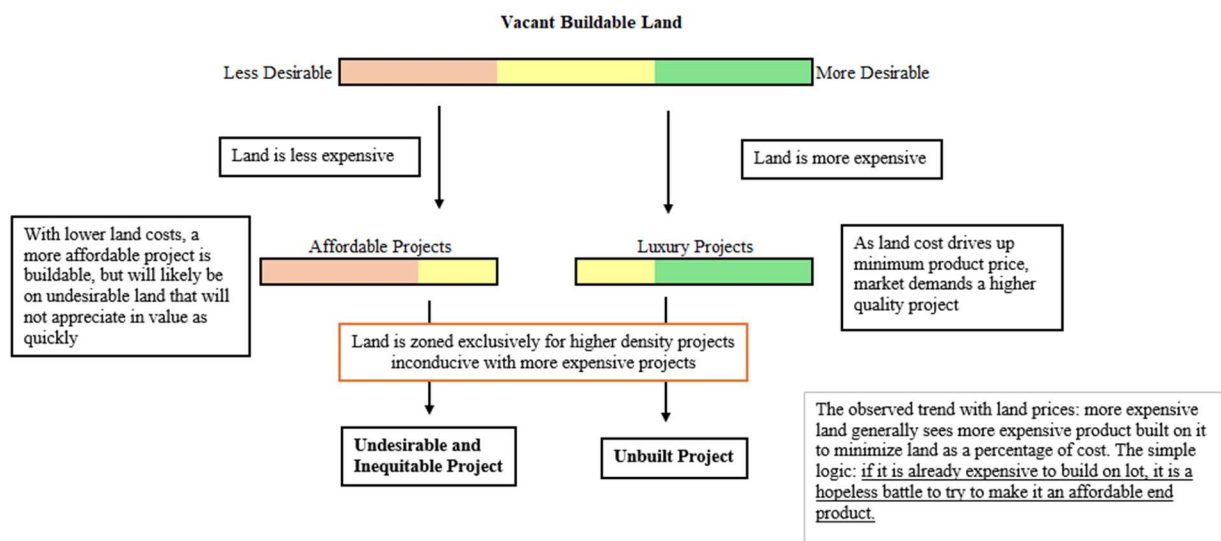


Figure 11: Framework for land cost dynamics with limited vacant land and variability in quality of land. Chart flow describes the process of land acquisition and zoning, with unbuilt or undesirable outcomes.

Emphasis on multifamily development alone does not reflect the needs of the county and fails to meet “projected housing needs of all economic segments of the community.” Indeed, the state HAPT model itself indicates a need for a wide range of product (see Table 2). Despite this reality, County Planning has identified multifamily housing as a point of emphasis for the 2025 Comprehensive Plan Update, repeating the claim that “the County needs to triple the current capacity for multifamily to accommodate 20-year housing needs under HB 1220,” (Orjiako, 2026). Observing HAPT numbers, this claim is technically true; however, this projection also ignores the context of scale. As observed in Figure 12, the actual scale of projected housing needed above 30% AMI is far greater than that of below 30% AMI. It is important to note that this is not the first time the “needs triple the current capacity” claim has been made in relation to multifamily, as it has previously been used erroneously to describe up to 80% AMI (see Figure 6).

County Planning has argued that there is sufficient capacity for middle housing and single-family housing and therefore exclusive focus on multifamily is reasonable. Such logic is what chiefly conflicts with the cost dynamics of limited land supply detailed in Figure 11. While it may be true that high-end luxury product can be built and that some low-end product may also be constructed, middle housing and standard single-family housing will become essentially absent in the new-construction market. This is despite 30%+ AMI housing making up 82% of the new homes that are projected to be needed in Clark County by 2045. As a result, the County will face housing shortages in multiple income brackets, limiting growth and ultimately pricing-out lower income earners.

A fundamental problem with Clark County’s position in development is that the county is not necessarily intended to govern urban development in the first place. The Vancouver Urban

Growth Area is by far the largest contiguous unincorporated urban area in Washington with a population greater than 150,000. The lack of annexation of this area by the City of Vancouver leaves the county in a difficult position and forces the adoption of housing policies not inherently designed for counties at-large. The extension of services such as sewer, power, and water is left to the responsibility of the County, making expansions to the UGB potentially costly and projects within the UGB overly competitive, driving land prices too high. Addressing these issues is essential for solving Clark County's housing needs.

Table 3: Washington State Dept. of Commerce Housing for All Planning Tool projections for Clark County housing needs in 2045.

Clark County Population Target = 718,154	Affordability Level (% of Area Median Income)								Emergency Housing/Shelter Beds
	Total	0-30%		30-50%	50-80%	80-100%	100-120%	120%+	
		Non-PSH	PSH						
Total Future Housing Needed (2045)	309,711	17,422	8,195	33,630	77,892	47,653	38,172	86,747	4,476
Estimated Housing Supply (2020)*	194,005	4,570	571	16,223	60,225	37,292	28,348	46,777	490
Net New Housing Needed (2020-2045)	115,705	12,852	7,624	17,407	17,667	10,361	9,824	39,970	3,986

* Note: Supply of PSH in 2020 is beds. However, projections of Net New Housing Needed (2020-2045) are in housing units. See Overview tab for details.

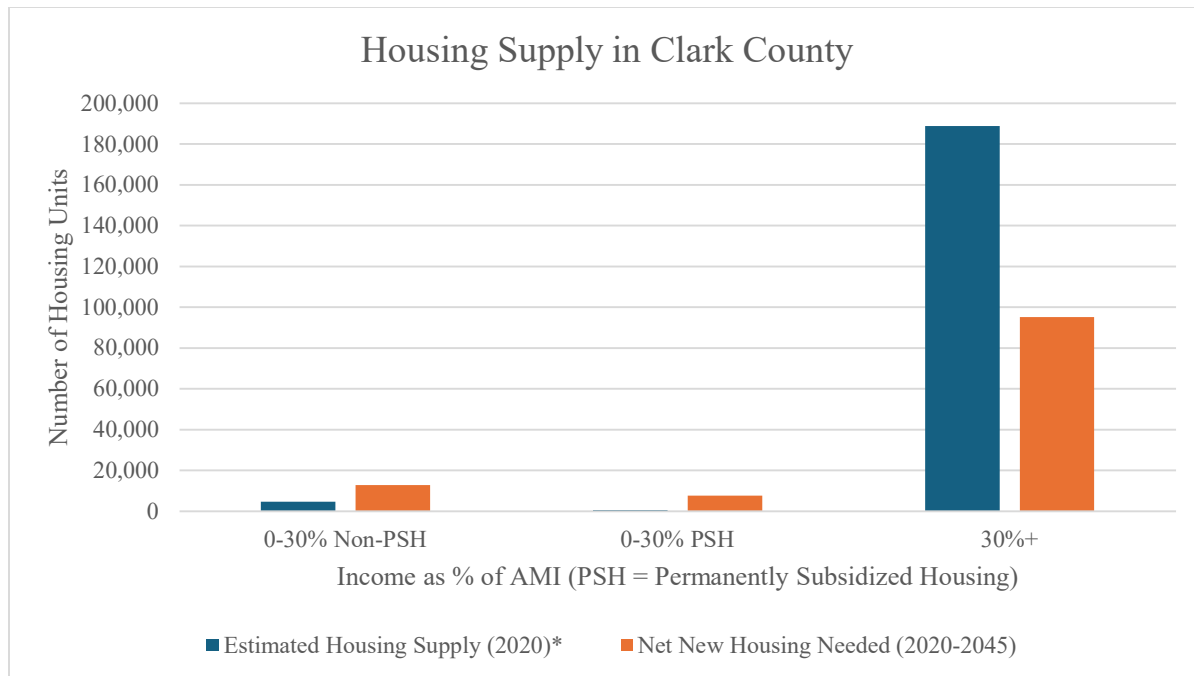


Figure 12: Housing Supply and Demand in Clark County in 2020 and 2045 respectively, based on AMI. Sourced from Washington State Department of Commerce Housing for All Planning Tool.

Recommendations: Public Sector

Based on the current analysis, it is evident that policy should be oriented to encourage the development of middle housing—specifically condominiums, multiplexes, townhomes, and cottage homes. Housing demand is greatest for this income segment, and even developments aimed slightly above this income segment, such as more luxurious versions of the aforementioned products, will likely address the needs of potential down-buyers from Income Quintile 3, leaving older product within the value range of Income Quintile 2. A vast array of public strategies that should be considered moving forward in policy development in Clark County.

Enhanced Lot-Indexing

Firstly, Clark County could implement enhanced lot-indexing to streamline environmental regulatory approval and general build-compatibility. Currently, lots are indexed in varying capacities depending on their location and sales history. Clark County Geographic Information Services (GIS) offers extensive data on most addressed lots, ranging from market value to geological hazards and habitat resources. However, the accuracy and timelines of these reports are often insufficient to plan for development projects. Indeed, Clark County GIS even offers a disclaimer that errors in this regard cannot be considered grounds for liability of losses to those who do business involving the land (Clark County GIS Property Information Center, 2026). Furthermore, the site itself offers no centralized location for finding land parcels that meet certain criteria regarding buildability. Available products such as the Developer's Packet offer more extensive generalized details on the county but still fail to index lots in a manner conducive to the development and building process. Clark County GIS should consider two primary endeavors: 1) a redesign of GIS websites to offer a more exploratory approach to potential lands (as opposed to the more diagnostic approach currently in place), and 2) a contractual endeavor with a third party to extensively index buildable lots for multifamily, readily addressing what issues may be faced by builders. The latter should be done in a way that provides not only clerical entry data for issues (simple "yes" and "no" inputs for the presence of issues) but also shows specifics such as the geographical location of the issue point (say, for example, a wetland) in order for developers and builders to plan around such an issue prior to land ownership.

Such an indexing strategy has multiple benefits: first, it allows for more accurate pricing of land parcels based on actual buildability (incorporating potential incurred costs), smoothing market actions for all involved parties. Secondly, the indexing strategy allows for the reduction

of holding costs for builders and developers, as changes and adjustments can be implemented for project plans prior to entering debt agreements to finance the purchase of the land. Put simply, if the time spent managing the specifics of developing of land can be shifted to the pre-ownership portion of the land (without major inquisition costs to the builder, which inherently shift towards consumers), developers and builders will pay less interest on their loans and thus be able to build a more affordable product.

As this theorized new system for lot indexing is developed, integration with construction design permitting and LEAN (the county's streamlined construction permit application system) projects could be coordinated with certain land plots. Such integration would allow builders to readily see what lots might work for projects on already-approved designs, thus increasing the value of the LEAN system. It should be noted, however, that LEAN itself could be reshaped to include townhomes and duplexes, as those product types are essential for addressing housing needs in Clark County. That necessity highlights another potential use of this system; providing a high-value index-and-match system to the private sector incentivizes the construction of any product conducive to that system, giving the county an effective control lever on the types of housing constructed. This is of course different from restricting certain housing types through zoning (which can lead to an overall absence of housing) and instead provides opportunity for specific types. Should the county aspire to address its middle-to-low-income housing shortage, using this incentive system to push for projects like cottages, multiplexes, townhomes and condominiums could prove to be an effective strategy.

Impact Fee Mitigation

Another potential strategy to employ throughout different municipalities is to replace direct impact fees with delayed tax obligations, supplying present cash flows with bonds backed by these tax obligations. At present, impact fees essentially function as a lump sum payment prior to the sale of a house. Impact fees are generally passed on to consumers through the final sales price of the home, which increases down payments and monthly mortgage payments. By circumventing the direct nature of impact fees and allowing these to be assessed only as a tax on property, jurisdictions have more control over the span of the payment and can reduce the initial downpayment level for homebuyers, empowering more citizens to achieve homeownership.

In cases of statutes limiting the variability of tax rates among citizens, establishing tax exemption and/or deferral programs similar to programs already in place (such as Clark County's Seniors and Persons with Disabilities Property Tax Deferral (Clark County Assessor's office, 2026)) on the grounds of equitable opportunities for lower-income citizens could sufficiently navigate legal challenges. As far as ensuring immediate cash flow to the jurisdiction, bond issuance is key to the success of a program. Tax obligations could be extended or deferred in theory for decades and therefore cannot be directly relied on to cover the costs of infrastructure expansion. Instead, the municipality would issue the bond, the payments of which would be backed directly by the tax revenue of the property which the funded infrastructure supports. Moreover, bonds could increase in desirability if tax revenues were temporarily invested in a larger bond-pool fund managed under similar regulations as the Clark County Investment Pool, therefore excluding riskier investments and providing stronger returns to bondholders (Clark County Finance Committee, 2024). Regardless of strategy, it is imperative to enable bond issuance to support tax burden deferrals. Conversely, jurisdictions should also consider revisiting

standards for bond issuance and explore ways to ease the process of issuing bonds to support housing goals.

Improved Clerical Support for County

A simple and immediate fix that is reflective of the challenges that Clark County faces in managing an unincorporated area the scale and scope of Vancouver UGA is hiring more clerical staff to streamline land use and construction permitting. Although those familiar with the struggles of permitting might consider the funding as paramount to the overall well-being of the county, that argument could be made for a range of government functions. Therefore, considering alternative modes of financing such expansions is a worthy exploration.

One option would be to turn to the private sector itself as a potential source of income, either through increased fees or through a direct funding agreement with an industry-representing group. While the idea of raising costs on builders may seem counterintuitive, if those funds are shown to directly reduce holding times (and thus costs), the net benefit to builders could be significant. Indeed, the cost of paying the salaries of a dozen more permitting staff may be less than the sum of permitting delay costs placed on the Clark County building industry on an annual basis. Assuming roughly 5,000 homes are constructed on an annual basis in Clark County (consistent with the projected growth needed in the county Comprehensive Plan) and cost for new clerical employees averages \$1,000,000 annually, in order to pay for itself the increase in staff would only need to save \$200 in cost per unit. According to a Clark County Community Development Permit Trends report for August 2025 through July 2026, the “New Home Construction Average Days” for time from submittal to issuance was roughly 62 days. Assuming a standard home loan on a plot of land costing \$200,000 at around 7% interest for construction

financing, home builders would likely pay between \$1,200 and \$1,600 per month in loan financing (although this amount could vary greatly based on the terms of the loan). With these prices in mind, saving even just one week in permitting time could save on loan payments alone more than the \$200 cost per unit needed to justify the cost of expanding clerical staff. Similarly to the needs of bond financing for tax obligation deferrals, the funding methods need not be precisely as proposed in this report—the explanations serve rather as illustrations to demonstrate the likely feasibility of addressing the problems. Irrespective of how it is funded, clerical staffing improvements in municipal permitting are crucial for the success of housing in Clark County. Anecdotal complaints from numerous builders interviewed for this report have illustrated the reality of these frustrations and validate these actions as worthy of investigation at a bare minimum.

Strategic Urban Growth Boundary Expansions

Clark County should consider targeted Urban Growth Boundary (UGB) expansions in order to encourage infill construction. As previously discussed, the largest barrier to infill development is the cost of “buildable” land. One way to drive down this cost is to increase the supply of available land. The key word in this strategy is ‘targeted’. Opening new land with no plans for specific efficient use in housing may pull investment capital away from infill developments and towards greenfield projects, failing to achieve the county’s goal of efficient, equitable housing. However, restricting all expansion still leaves the problem of a shortage of cost-factored-buildable land for projects within the UGB. A solution to this shortage could come in the form of efficiently planned urban expansion projects on the outskirts of the UGB. Through adding these lands with restricted specific use, projects and unit types aligned with Q1 and Q2

demand can be constructed, increasing overall supply in the county and driving down land prices within the UGB. Outright resistance to any and all expansions to the UGB leaves Clark County without leverage to control prices for specific unit types. Indeed, expansions to the UGB are wildly valuable to developers and thus serve as another way for the county to influence what types of units are built. Should an expansion area be zoned to require the construction of denser multifamily and middle-housing projects, those units will likely be readily constructed in that expansion area, and the price of similar units within the present Urban Growth Area would fall due to an increase in supply. As this supply of built product increases, land zoned for the construction of such land also becomes less valuable, as its perceived scarcity decreases. Such a trend would facilitate the construction of new units.

Establishing a County Housing Commission

It is important to clarify that municipal governments such as Clark County are often dealt an unfair level of criticism for their handling of urban growth management. The shortcomings in growth management are not the product of incompetency, but rather a lack of intra-market collaboration—a trend not unique to Clark County. The housing market experiences significant interaction in both the public and private sector, as well as the supply and demand side of the market. Failure to address these interactions and establish more consistent means of collaboration have led to the issues Clark County now faces. With this critical source of ongoing issues in mind, the most important recommendation is to establish a permanent Housing Commission for Clark County. Currently, no such commission exists, with the most similar organization being the Vancouver Housing Authority. The Executive Staff and Board of Commissioners of the VHA feature no representatives from the building industry. Through

interviews with county staff, elected officials, and appointed executives, and with members from the private sector like land use attorneys, engineers, builders, tradespeople, and developers, one general trend became clear: these representatives of different industries rarely interact with one another in a generally productive manner to address the same problems.

Other jurisdictions have faced similar challenges and come to similar conclusions. While housing commissions are not required in every county, forward-thinking jurisdictions have created housing commissions to attempt to solve internal problems before they occur (or in the case of Clark County, become worse). One such example of a successful response is Tillamook County, Oregon. Although significantly smaller than Clark County, Tillamook County faced similar problems in the late 2010s. As outlined on the Tillamook County website, land limitations due to geographic/topographic challenges and state-level land use policies were acknowledged. The county recognized that current housing authorities did not have the resources at the time needed to aid the county's efforts and also understood that building costs were limiting the ability of projects to "pencil out". Tillamook County of course faced other issues unique to their situation, such as the nature of coastal construction or the specific income levels of their residents. Overall, however, the issues mirrored those faced by Clark County today. Tillamook County's solution was to form a housing commission to readily address these problems, incorporating members from a wide range of backgrounds and professions: "Membership includes a County Commissioner, Department of Community Development staff, representatives from local major employers, nonprofits, City of Tillamook as well as residents of both north and south county, and at-large members with relevant professional experience" (Tillamook County OR, 2026). The results of this diverse lineup have been somewhat successful, such as the channeling of funds towards space-efficient housing (Tillamook County Pioneer, 2025).

However, the work is slow moving and will likely take time to thoroughly address the county's needs.

There are several lessons to learn from Tillamook County's experience. The first is that an effective housing commission requires collaboration between public and private sector representatives, as the work should be viewed as a collaborative effort rather than independent challenges. The second is that county land is not endless—and this is particularly the case in the naturally complex and lush regions of the Pacific Northwest. While targeted expansions of urban growth boundaries are important, builders, developers, and policy makers alike must reconcile with the limits inherent to their work. The last lesson from Tillamook County is that these solutions require time to achieve success. Change does not occur overnight, and Clark County must prepare to face setbacks and adapt to circumstances while implementing solutions.

Recommendations: Private Sector

As with any policy related issue, certain actions should be taken in the private sector to encourage successful collaboration and operation within the bounds of industry set up by the public sector. The private sector's participation in addressing the housing crisis is critical to provide a boots-on-the-ground perspective in executing a larger vision (which the private sector will more likely support if involved in its creation). To accomplish the adjustments needed industry-wide to ensure housing success in Clark County for decades to come, firms must make collective efforts. Trade associations like the Building Industry Association will likely serve a necessarily large role in organizing such actions.

Adjustments towards new product types are not routine for most construction firms. This is particularly true when transitioning from single-family to multi-family construction. In fact,

the single-family and multi-family segments are often regarded as their own unique markets (Emrath, 2016). There is no blueprint on how to adjust the operations of a firm to transition from focusing on single-family homes to duplexes and condominiums, and thus industry-wide support is necessary. Advocacy groups like the BIA of Clark County and Clark County Association of Realtors (CCAR) have the opportunity to add value to services by organizing training and education sessions on the dynamics of the middle-low-housing market. An important aspect of industry and public buy-in to these changes is ensuring that firms and individuals do not feel “left behind” by code changes that are out of their control. The Clark County homebuilding industry is competent and experienced, and thus is worthy of investment in smoothing a transition to an adjusted market.

Local associations should emphasize the LEAN review process during training. Although LEAN is not a perfect system and should be expanded to encompass more property types, it still serves as a valuable tool that dramatically reduces permitting time on builds. It should never be the case that homebuilders in Clark County do not employ the LEAN building permit application process simply because of a lack of know-how or regulatory stipulations. Partnering with experts (or perhaps the county itself), groups like the BIA could provide resources, trainings, and information sessions on the LEAN system, helping firms improve their operations and ultimately provide a more affordable product to the public.

Another potential strategy for firms in Clark County is to leverage partnerships or joint ventures to invest in multiple plots of land, thus spreading risk of an area failing across multiple firms and minimizing the highs and lows of construction cycles. When considering infill projects in which only a handful of units can be built on a land parcel, risk may be considered low if a builder has lots across a range of areas rather than banking on a singular subdivision. However,

the risk of a loan for a singular project may increase as outcomes are not diversified over a range of products, but limited to a singular lot. Should a firm only be working on a small number of infill lots at any given time, they may have trouble securing loans with advantageous terms due to the lack of diversification in their projects. One solution to the problem of risk for lenders is for builders to create partnerships amongst themselves to pool projects when securing construction loans, reducing risk to lenders and thus allowing for more advantageous terms, reducing holding costs. It is not uncommon for small-to-midsize firms to form partnerships to hedge risk (Construction Executive, 2017), but it is somewhat novel to do so to reduce the risk of infill development. Nonetheless, Clark County builders could be on the forefront of a financing strategy that could enable more cost-efficient infill construction.

Conclusion

Clark County is approaching the climax of a growth journey that began when the land was a meeting place for different native peoples prior to the establishment of the Fort Vancouver trading post in the 1840s. From those humble beginnings, Clark County has surpassed expectations and become a major component of the Washington economy, as well as a key part of the Portland Metropolitan Area. Clark County now faces a problem its founders likely never foresaw and a problem that is symptomatic of the giant it has grown to be. The responsibility to solve that problem now lies with the contemporary inhabitants of the land in order to ensure Clark County will remain a place for generations of tenacious, spirited citizens to come.

Clark County economic data has been subject to framing in order to tell stories that are advantageous to different parties with varying interests. By and large, this data has been presented in a fair, understandable way. However, key interpretations have left decision-makers

with a misinformative view of the reality of Clark County housing. Clark County's largest deficit in the housing market for ownership exists in Income Quintile 2, and the homes that provide the best long-term opportunities for those citizens are middle-housing products such as cottages, multiplexes, condominiums, and townhomes.

There are multitudes of solutions that could be applied to help solve the housing crisis, both in the private and public sectors. However, none of these strategies will prove effective if the fundamental approach to housing is not reimagined in a more collaborative way. It is naïve to expect a city or county planner to understand the intricacies of the building industry, just as it is naïve to expect a builder or developer to understand the complexities of urban planning. And yet, the problem of housing can only be solved by incorporating those two realms (alongside several others) into one greater system. Therefore, above all else, public-private collaboration should be the highest priority of those looking to address the Clark County housing crisis. This collaborative tone is best set by an official Housing Commission, following the examples of other jurisdictions in the Pacific Northwest that have faced the same challenges as Clark County and found solutions through working together.

To those involved in Clark County's development, whether as planners, governors, builders, or any other form of citizen, it is critical to remember that there is no such thing as a backup or failsafe to our county. Clark County cannot be started over from scratch. We find ourselves on land that has served and supported different peoples for longer than written history can tell us. Now, we bear the responsibility of ensuring that the land remains a place that can serve and support all of those who call it home. Future generations will look back to this time as one of great importance in which the people of Clark County made choices that would impact the

county for decades or even longer. Let us all earnestly try to ensure that those future Clark County citizens look back on us with gratitude.

Appendix

1.

Designation	Current Zone	Proposed Zone
Urban Medium	R-12/OR-15	R-24/OR-24
	R-18/OR-18	R-36/OR-36
	R-22/OR-22	
Urban High	R-30/OR-30	R-50/R-50
	R-43/OR-43	

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2.

Clark County Housing Availability Based on Income (Dynamic, Annual, Inflation Adjusted to Base Year)

Household Quintiles *Roughly Equal by Household Count	Number of Households in Income Bracket	Income (USD)	Maximum Affordable Home Price (USD)	Price Ranges (quintiles Approximately correlated with Household Count quintiles via Income Cutoffs)	Number of Unoccupied Units on Market (By Quintile Bounds)	Number of Households per Unoccupied Unit On Market
Income quintile 1	6,609	Less than 10,000 \$	15,857.00	Income quintile 1	240	148.9
	3,347	10,000 to 14,999 \$	34,340.00			
	3,527	15,000 to 19,999 \$	52,823.00			
	3,874	20,000 to 24,999 \$	71,311.00			
	4,218	25,000 to 29,999 \$	89,794.00			
Income quintile 2	3,811	30,000 to 34,999 \$	108,277.00	Income quintile 2	76	479.4
	5,371	35,000 to 39,999 \$	126,760.00			
	4,984	40,000 to 44,999 \$	145,243.00			
	5,307	45,000 to 49,999 \$	163,727.00			
	12,705	50,000 to 59,999 \$	200,693.00			
Income quintile 3	18,426	60,000 to 74,999 \$	256,143.00	Income quintile 3	367	79.7
	29,243	75,000 to 99,999 \$	348,559.00			
	27,841	100,000 to 124,999 \$	440,975.00			
	17,063	125,000 to 149,999 \$	533,390.00			
	23,553	150,000 to 199,999 \$	718,222.00			
Income quintile 4	32,374	200,000 or more \$	903,054.00	Income quintile 5	602	92.9

*Quintile calculation limited by data bucket bounds provided by USCB. Normalized in Pop. Of Quad./Unit Count.

Sources: United States Census Bureau, Redfin Corporation.

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