



May 17, 2021

Camas Planning Commission
616 NE 4th Ave.
Camas, WA 98607

RE: Camas Housing Action Plan

Dear Planning Commission and Community Development Staff;

I am writing to you on behalf of the Building Industry Association of Clark County (BIA) to respond to the request for comment on the proposed Housing Action Plan for the City of Camas. The action plan aims to explore strategies for affordable housing options and increased density.

Based on the proposed plan, we believe the majority of the strategies mentioned would be positive both for builders and the community of Camas. However, there were key points and suggestions that would disincentivize builders from building more affordable housing in Camas. The following strategies would hinder any efforts to build more housing, specifically affordable, middle-level housing in the City of Camas.

1. Mandatory Inclusionary Housing Policy in Camas:

Mandating a percentage of units built to be reserved as affordable units would hurt efforts to create more affordable housing options in the City of Camas. Providing incentives to builders such as reducing parking requirements, providing density bonuses, or other zoning-related strategies would be a better approach. Camas has the highest median household income in Clark County at \$106,513 and such efforts would target those who make substantially less than the median income (60%-80% of median household income). Housing is considered affordable when 30% or less of household income is spent on housing. Based on this definition of affordable, those at the 60% level could afford a mortgage or rental payment of \$1,598. We believe this is an achievable goal and mandating more stringent requirements would disincentivize building. The City of Camas needs to decide whether their intent is to create more affordable housing options for the community or if the goal is to create more low-income housing options.

Developers have a choice in when and where they build, having requirements for affordable units based on the size of the development, or requiring contribution to an affordable housing fund, creates incentives for dodging these requirements (i.e. building right below a certain size to avoid requirements). We believe the best strategy is to allow the market to dictate what is built. The city could up-zone areas in the urban core to elicit more affordable high-rise rental units, while at the same time allowing diversified housing types to create opportunities for row houses, town homes, cottage housing, and tiny homes. This strategy is exciting because it allows for homeownership rather than depending on rental units to achieve affordability. As mentioned in the plan, this could take place as a part of infill, redevelopment, vacant land development, etc. ADUs would also be a

great solution, where allowed. We are in full support of diversifying housing types as outlined in strategy three. We assert that a wholistic approach to address housing affordability is the best path forward.

2. Explore Funding Source Options for Affordable Housing:

As mentioned by the Planning Commission, monitoring outside funding sources may take a large amount of staff time. In contrast, incentives like those mentioned above and within the study would be pragmatic and efficient in the use of staff time and resources.

Moreover, the restructuring of impact fees based on the size of residential development would have the opposite effect desired. Average net profit for a builder in Clark County is 8%, well below the national average of 8.89% (according to a NYU Stern database of 7,000 companies across all sectors). Calculating these variable impact fees would enhance complexity and take more of staff's time.

In addition, builders and developers are struggling because the cost of building materials has skyrocketed. For example, framing lumber has increased the cost of new home construction by \$36,000. Any additional costs will invariably be passed onto the buyer, negating any efforts to make housing more affordable. Additionally, an inflated increase of fees will not only affect current projects, but also require builders to reconsider future developments in Camas. Any increase in cost makes surrounding areas (not in Camas) more attractive to buyers and developers.

3. Explore Density Modifications in the R Zones:

We are supportive of this strategy. However, we are concerned with the suggestion of up-zoning to a 6-unit minimum density across all single family residential zoning districts. Up-zoning would be better used in urban nodes, vacant land, and the urban core in general. Downtown Camas is ripe for redevelopment and efforts should be focused there. We are concerned that increasing minimum density may lead to a loss of character for many residential areas in Camas and could discourage people from moving to Camas because the character and small town feel would be lost. As previously stated, this strategy may lead homebuyers to other jurisdictions if implemented. We agree with the Planning Commission that selective rezoning would be preferable to up-zoning.

We applaud the efforts of the Planning Commission and staff in considering and creating the Housing Action Plan. Going forward, we hope to be a partner to create mutually beneficial solutions for builders, buyers, and the City of Camas. We appreciate staff reaching out to the BIA to get our input on this matter.

Sincerely,



Justin Wood
Government Affairs Coordinator