

**From:** [Jeffrey Delapena](#)  
**To:** [Heidi Pozzo](#)  
**Cc:** [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)  
**Subject:** RE: Planning Commission 2025 Comprehensive Plan Public Comments  
**Date:** Wednesday, January 7, 2026 4:39:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Heidi,

Thank you for providing this feedback ahead of the Joint Hearing to select the Preferred Land Use Alternative for the 2025 Comprehensive Plan Update.

I am forwarding to additional members of Staff. Your comments will be brought to the attention of the Planning Commission ahead of the Hearing and be added to the Index of Record.

Best,



**Jeff Delapena**  
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**From:** Heidi Pozzo <hcpheidi@yahoo.com>  
**Sent:** Wednesday, January 7, 2026 3:51 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>  
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**Subject:** Planning Commission 2025 Comprehensive Plan Public Comments

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Dear Clark County Planning Committee and Council,

This morning I listened to the Council work session discussion of the current status of the planning for the updates you will discuss tomorrow, the 8<sup>th</sup>. There are several items that are important to understand as you think about approving changes to the Vancouver Urban Growth Area.

In 2004 and 2007, the County placed 2,200 acres of land that were included in the Vancouver Urban Growth Area in urban holding because the transportation infrastructure in those areas lacked adequate capacity to accommodate urban level development.

At the November 12, 2019 Council meeting, Clark County Council lifted the urban holding designation. As part of this process, there was an acknowledgement of the concurrency regulations that require infrastructure upgrades and a 6 year financing plan was approved to make those upgrades.

During the same time period, the County's 20-year 2015-2035 Growth Management and Comprehensive Plan explicitly called for increased residential density in this corridor. The 2025-2045 Plan nearing completion calls for even more density.

Given the current conditions and proposed increased density in the area around 179<sup>th</sup>, I respectfully request you:

- Understand the scale of development in the area as it transitions from rural to significantly dense in a short period of time
- Review how concurrency is being evaluated to ensure that development is not outpacing infrastructure
- Evaluate the impact of increased density zoning and development on support services
- Mitigate the impact of intermittent road closures from the combination of 179<sup>th</sup> street closures and development tie in to utilities

Following is an overview and background to add context

### **What exists today**

While much of the area around 179<sup>th</sup> is zoned as commercial and various urban housing densities, the reality is the land is still largely 5, 10, 20 acre parcels, which is why it is discussed as part of the vacant land building model.

These parcels of land are largely serviced by wells for water and septic tanks. Each parcel developed needs to be connected to the water and sewer lines. Some consideration for cable to get internet service.

Each connection to these services requires digging up the road and having flaggers to allow one lane of traffic to pass while the other is closed. And until a year ago, water and sewer were not available up 29<sup>th</sup>. Work was done to extend the line (which required road closures) north. However, it is not clear to me that the extensions have gone as far north as the zoning allows for converting those rural parcels to dense subdivisions

While much discussion has been ongoing for years, 179<sup>th</sup> remains a narrow two lane road with no sidewalks, streetlights, curbs, etc. School busses stop to collect kids and trash collection trucks stop to empty trash bins along the road. I was recently behind a school bus picking up 34 children between the two South Ridge apartments and the house between it. 20 cars stacked up while the children were getting on the bus.

Because the parcels are so large, there are long stretches between the north/south roads. For example, when the intersection at 179<sup>th</sup> and 29<sup>th</sup> is closed, people need to head up 10<sup>th</sup> or 50<sup>th</sup> (the north south roads) and across 199<sup>th</sup> to detour. The distance between 10<sup>th</sup> and 50<sup>th</sup> is about 2 miles. Roads between are planned to be built by developers as each parcel is developed.

### **What development looks like**

To give you an example of what going from/to looks like, an example that is at the

end of the development process now is the Four Creeks North development located at 18320 NE 29<sup>th</sup> Ave, just north of 179<sup>th</sup>.

This is a 4.79 acre parcel zoned R-12 which is being developed into 39 lots ranging in size between 2,720 sq ft and 4,289 sq ft., the bulk of the lots being on the smaller side. This location is where sewer and water lines were recently extended.

Under the new recommendations by staff, this location would move to R-24 zoning, which would double density.

Today, 29<sup>th</sup> is also a two lane road, with narrow lanes, no sidewalks, no street lights, etc. As each parcel is developed, the developer will widen the road and add sidewalks. Until all parcels are developed, there will not be connected sidewalks. If you head south of 179<sup>th</sup> down 29<sup>th</sup>, you'll see there are remaining undeveloped parcels so people walk in the street, along a busy road, to get from one sidewalk segment to the next.

## **Concurrency**

State and County regulations require that transportation improvements be made concurrent with development. There was significant discussion on this front when the urban holding was lifted in 2019. However, while a plan was put in place, the reality is, the two mile stretch from I-5 to 50<sup>th</sup> won't be completed until 2033-2035 and the I-5/179<sup>th</sup> interchange won't be completed until 2031 if the timeline holds.

While each development goes through a concurrency review, my concern is that the quantum of approved developments which are not fully built out, along with the regular road closures in the area is not fully reflected in the traffic surveys conducted for each discreet development.

My concern is that given the pace of approving developments, proposed increased density, and the increased business zoned development such as the 583,000 sq ft Mt Vista Logistics facility that is under construction, vehicle trips will outpace the capacity of the road before it is completed in 2033-2035.

See below for summary statutes.

## **Road Closures**

179<sup>th</sup> and adjacent roads have been experiencing various forms of lane reductions and closures for years.

The development on 179<sup>th</sup> and NW 11<sup>th</sup> had full closures for 5-10 minutes at a time on 179<sup>th</sup> to tie in utilities. There were no posted signs notifying the public these would take place, just that flaggers were ahead.

The South Ridge Apartments (on 179<sup>th</sup> between 15<sup>th</sup> and 29<sup>th</sup>) were built in two phases with similar full street closures for short periods of time ,or one lane with flaggers.

Three month full road closures have occurred multiple times on 29<sup>th</sup> and 179<sup>th</sup> for sewer and utility work, as well as utility tie ins for new developments.

Current full closures are in effect now at 29<sup>th</sup> and 179<sup>th</sup>, with a two year duration. These closures will continue to move west along 179<sup>th</sup> through 2031 until the 179<sup>th</sup> project is complete, then will move east of 29<sup>th</sup> through 2035+.

Given the number of parcels in the area that are available for development, the continued road closures for utility tie in has significant potential to continue to impact people in the area on top of the closures for the 2 miles of improvements east of I-5 on 179<sup>th</sup> and the area to the west of I-5 for the interchange improvements. The County should attempt to get developers to work together on improvements to reduce the impact to residents.

## **Other Considerations**

Rapid development also requires development of support services such as schools, fire and police.

Today, Fire District 6 does not have any fire stations on the east side of I-5, but

density is increasing which will impact response times and service needs. Clark Cowlitz Fire stations are further north, with the exception of the joint station by the Fairgrounds. It is unlikely this would be sufficient to service the increased development.

Ridgefield School District has two parcels of land by 179<sup>th</sup> and I-5 designated for two schools that would service K-8. Neither are funded or built. Yet given the price range of the housing units being built, this is the prime range for school age children. Battle Ground Schools are also cover this area. I don't know their plans.

The Sherriff's department is understaffed and does not regularly have sufficient coverage for north Clark County. It is unclear to me how there will be sufficient coverage with increased development given the other items Council is juggling.

Rapid growth puts a burden on existing homeowners to pay for building out services. While impact fees exist, it does not cover the cost of growth. Residents in the area have just approved an increase in school and fire, but it is not sufficient to cover additional needs.

Parks are also needed to service significant numbers of new people. It is unclear how these needs will be met. However, if you have driven through any of these new developments, you'll note there is not much land dedicated to recreation (technical requirements are met, but functionality is often lacking resulting in desire for parks).

As I noted above, it is unclear to me whether the current availability and design of water, sewer, etc. will support the increased density being proposed.

Given all of the above, Council should give consideration to how increasing density further will impact the Vancouver Urban Growth Area.

### **Summary Concurrency Regulations**

#### **Washington State Growth Management Act - Concurrency Requirements**

**RCW 36.70A.070(6)(b)** requires that:

"Local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a locally owned transportation facility to decline below the standards adopted in the transportation

element of the comprehensive plan, unless improvements or strategies to accommodate the impacts of development are made concurrent with the development." [1]

**Definition of "Concurrent with Development":** Transportation improvements or strategies must be "in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years." [1]

### **Clark County Concurrency Ordinance**

Clark County Code Section 40.350.020 implements the state concurrency requirement and establishes a Transportation Concurrency Management System that requires:

- Establishment of level of service (LOS) standards for arterial and transit routes
- Prohibition of development approval if it causes LOS to decline below adopted standards
- Transportation impact studies for developments affecting corridors or intersections of regional significance [2]

[1] RCW 36.70A.070(6)(b), Washington State

Legislature, <https://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.070>

[2] MRSC - Concurrency, Municipal Research and Services Center of Washington, <https://mrsc.org/explore-topics/planning/gma/concurrency>