

From: [Rebecca Messinger](#)
To: [Cnty 2025 Comp Plan](#)
Subject: FW: Title 40 : Change in the "Land Use" Code is badly needed for public safety
Date: Thursday, June 18, 2026 2:37:40 PM
Attachments: [20260507 JKDEAB Members.pdf](#)
[20260618 JLKCC - staff- planning commission.pdf](#)
[image001.png](#)

Good afternoon,

Please see the public comments below and attached documents.

Thank you!



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305

Email: Rebecca.Messinger@clark.wa.gov



From: Janet Kelly <jankelly@icloud.com>
Sent: Thursday, June 18, 2026 2:26 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>
Cc: Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; community.planning@clark.wa.gov; Victoria Abram <Victoria.Abram@clark.wa.gov>; Ken Lader <Ken.Lader@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: Title 40 : Change in the "Land Use" Code is badly needed for public safety

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

June 18, 2026

Clark County Council Members

County Manager

County Community Development and Planning Staff

Planning Commission

Development and Engineering Advisory Board

Letter to the Council and Staff

Subject: Concerns Regarding Private Street Widths, Parking Standards, and Infrastructure Concurrency in High-Density Developments

Dear Council Members and County Staff,

I am writing to formally address the ongoing approvals of high-density housing developments featuring narrow private streets and what appears to be insufficient off-street parking infrastructure within unincorporated Clark County. While the Growth Management Act (GMA) mandates that counties plan for population growth and encourage urban density, the specific design standards—including street widths and parking ratios—are governed by local county ordinances.

1. Jurisdiction Over Private Street Standards

Under Clark County Code (CCC) Chapter 40.350.030 (Street System Design), the county establishes the minimum right-of-way and pavement widths for both public and private streets. While developers are responsible for constructing private options, and Homeowners Associations (HOAs) inherit their ongoing maintenance, the structural and width design parameters require direct approval from the Clark County Department of Community Development.

2. Parking Ratios and Residential Density

The current minimum parking requirements for multi-family and townhouse developments often do not align with the practical vehicle ownership rates

of residents. In high-density zones:

- CCC 40.340.010 (Parking, Loading, and Circulation) outlines the minimum off-street parking spaces required per dwelling unit.
- Due to regional housing costs, multi-family units frequently house multiple working adults, leading to a higher vehicle-to-household ratio than the minimum requirements accommodate.
- This deficit results in overflow parking on narrow private streets, creating logistical challenges for service vehicles and potentially obstructing emergency vehicle access, which is regulated under the International Fire Code (IFC) Section 503, adopted via CCC 14.04.120.

3. Transit Accessibility and Regional Commutes

According to C-TRAN's systemic route data, fixed-route transit service in unincorporated areas like North Orchards features longer headway times and limited pedestrian connectivity compared to the urban core of Vancouver. For residents living outside the immediate quarter-mile transit walkshed, commuting via public transit to downtown Vancouver often requires significantly longer travel times than single-occupancy vehicles, necessitating local vehicle reliance.

4. Annexation and Code Compatibility

Under Washington State law (RCW 35A.14), unincorporated areas annexed by the City of Vancouver must eventually integrate into the city's infrastructure. However, the City of Vancouver Strategic Plan and Municipal Code (VMC Title 11 - Streets and Sidewalks) maintains different engineering standards for street widths and public dedication. Annexing developments with narrow private streets creates long-term right-of-way anomalies that cannot easily be retrofitted to meet city standards due to existing physical setbacks.

5. Transportation Concurrency and the 6-Year CFP

Per the GMA (RCW 36.70A.070) and CCC 40.350.020 (Transportation Concurrency), development approvals are contingent upon ensuring that transportation facilities have adequate capacity to accommodate the impacts of development within a six-year window. This is tracked via the county's 6-Year Transportation Improvement Program (TIP). When planned regional roadway improvements face funding or construction delays, the local internal street networks bear the immediate burden of increased traffic volume without the support of the broader planned grid.

I urge the Council and Planning Commission to re-evaluate the minimum parking and private street width standards in Title 40 to ensure future high-density growth does not compromise safety, emergency access, or long-term municipal compatibility.

Sincerely,

Janet L. Kelly

Cedar 49 Resident

9309 NE 83rd Ave

Vancouver, WA 98662

References & Regulatory Citations

- Washington Growth Management Act (GMA): RCW 36.70A.070(6) – Mandates the transportation element, concurrency requirements, and the requirement for a multi-year financing plan.
- Clark County Code (CCC) Transportation Concurrency: CCC 40.350.020 – Sets the guidelines for ensuring transportation systems can handle new developments within six years.
- Clark County Code (CCC) Street Design Standards: CCC 40.350.030 – Dictates the specific design, width, and allowance of private vs. public roads.
- Clark County Code (CCC) Parking Standards: CCC 40.340.010 – Establishes minimum off-street parking spaces per residential unit type.
- International Fire Code (IFC): Section 503 (Fire Apparatus Access Roads) – Adopted via CCC 14.04.120, regulating minimum unobstructed widths required for emergency vehicle access.
- Washington Annexation Laws: RCW 35A.14 – Governs the processes and implications of code transitions when a code city annexes unincorporated county land.

June 18, 2026

Clark County Council Members

County Manager

County Community Development and Planning Staff

Planning Commission

Development and Engineering Advisory Board

Letter to the Council and Staff

Subject: Concerns Regarding Private Street Widths, Parking Standards, and Infrastructure Concurrency in High-Density Developments

Dear Council Members and County Staff,

I am writing to formally address the ongoing approvals of high-density housing developments featuring narrow private streets and what appears to be insufficient off-street parking infrastructure within unincorporated Clark County. While the Growth Management Act (GMA) mandates that counties plan for population growth and encourage urban density, the specific design standards—including street widths and parking ratios—are governed by local county ordinances.

1. Jurisdiction Over Private Street Standards

Under **Clark County Code (CCC) Chapter 40.350.030 (Street System Design)**, the county establishes the minimum right-of-way and pavement widths for both public and private streets. While developers are responsible for constructing private options, and Homeowners Associations (HOAs) inherit their ongoing maintenance, the structural and width design parameters require direct approval from the Clark County Department of Community Development.

2. Parking Ratios and Residential Density

The current minimum parking requirements for multi-family and townhouse developments often do not align with the practical vehicle ownership rates of residents. In high-density zones:

- **CCC 40.340.010 (Parking, Loading, and Circulation)** outlines the minimum off-street parking spaces required per dwelling unit.
- Due to regional housing costs, multi-family units frequently house multiple working adults, leading to a higher vehicle-to-household ratio than the minimum requirements accommodate.

- This deficit results in overflow parking on narrow private streets, creating logistical challenges for service vehicles and potentially obstructing emergency vehicle access, which is regulated under the **International Fire Code (IFC) Section 503**, adopted via **CCC 14.04.120**.

3. Transit Accessibility and Regional Commutes

According to C-TRAN's systemic route data, fixed-route transit service in unincorporated areas like North Orchards features longer headway times and limited pedestrian connectivity compared to the urban core of Vancouver. For residents living outside the immediate quarter-mile transit walkshed, commuting via public transit to downtown Vancouver often requires significantly longer travel times than single-occupancy vehicles, necessitating local vehicle reliance.

4. Annexation and Code Compatibility

Under Washington State law (**RCW 35A.14**), unincorporated areas annexed by the City of Vancouver must eventually integrate into the city's infrastructure. However, the **City of Vancouver Strategic Plan and Municipal Code (VMC Title 11 - Streets and Sidewalks)** maintains different engineering standards for street widths and public dedication. Annexing developments with narrow private streets creates long-term right-of-way anomalies that cannot easily be retrofitted to meet city standards due to existing physical setbacks.

5. Transportation Concurrency and the 6-Year CFP

Per the GMA (**RCW 36.70A.070**) and **CCC 40.350.020 (Transportation Concurrency)**, development approvals are contingent upon ensuring that transportation facilities have adequate capacity to accommodate the impacts of development within a six-year window. This is tracked via the county's **6-Year Transportation Improvement Program (TIP)**. When planned regional roadway improvements face funding or construction delays, the local internal street networks bear the immediate burden of increased traffic volume without the support of the broader planned grid.

I urge the Council and Planning Commission to re-evaluate the minimum parking and private street width standards in Title 40 to ensure future high-density growth does not compromise safety, emergency access, or long-term municipal compatibility.

Sincerely,

Janet L. Kelly

Cedar 49 Resident

9309 NE 83rd Ave

Vancouver, WA 98662

References & Regulatory Citations

- **Washington Growth Management Act (GMA):** *RCW 36.70A.070(6)* – Mandates the transportation element, concurrency requirements, and the requirement for a multi-year financing plan.
- **Clark County Code (CCC) Transportation Concurrency:** *CCC 40.350.020* – Sets the guidelines for ensuring transportation systems can handle new developments within six years.
- **Clark County Code (CCC) Street Design Standards:** *CCC 40.350.030* – Dictates the specific design, width, and allowance of private vs. public roads.
- **Clark County Code (CCC) Parking Standards:** *CCC 40.340.010* – Establishes minimum off-street parking spaces per residential unit type.
- **International Fire Code (IFC):** *Section 503 (Fire Apparatus Access Roads)* – Adopted via *CCC 14.04.120*, regulating minimum unobstructed widths required for emergency vehicle access.
- **Washington Annexation Laws:** *RCW 35A.14* – Governs the processes and implications of code transitions when a code city annexes unincorporated county land.

Date: May 7, 2026

To: Eric Golemo (egolemo@sgaengineering.com)

To: Ryan Wilson (ryan@wilsonarchitects.us)

CC: Clark County Developer Advisory Board (DEAB)

RE: Urgent Request for Building Code Amendment: Mandatory 40ft Street Widths in High-Density Developments

Dear Mr. Golemo and Mr. Wilson,

As a concerned resident of Clark County, I am writing to the Developer Advisory Board (DEAB) to formally request a recommendation for an essential update to our building codes. To ensure the safety of our community and the efficacy of our first responders, we must mandate a minimum street width of **40 feet** for all new high-density housing developments.

While the push for affordable, high-density housing is understandable, the current execution is creating a significant public safety crisis. Specifically, the "footprint" of these developments—often townhomes with undersized garages and driveways—has rendered our secondary streets impassable for emergency vehicles.

The Mathematical Reality of the Hazard

Currently, many of these developments feature 24ft wide streets. When we look at the math, the danger becomes clear:

- **Vehicle Footprint:** The average vehicle requires 8 feet of width for street parking.
- **Dual-Side Parking:** In high-density areas where households often contain 3-4 working adults, vehicles are parked on both sides of the street. This consumes 16 feet of the roadway.
- **The Resulting Gap:** This leaves a remaining pathway of only **8 feet**.
- **First Responder Requirements:** A standard fire truck is approximately **8.5 feet wide** (excluding mirrors) and can reach **10.5 feet wide** with mirrors extended.

Under the current code, it is mathematically impossible for a fire truck or ambulance to navigate these streets when residents are parked at their homes. This creates life-threatening delays during medical emergencies and fires where every second is critical.

Conflicting Perspectives on Safety

In discussions with county officials, there appears to be a disconnect regarding the severity of this issue. While some administrative voices suggest these streets are navigable, my

communications with Fire Commissioner Gibson and the Fire Marshal of the City of Vancouver indicate a much grimmer reality. Emergency personnel have expressed deep concern regarding the time delays caused by narrow streets and the current parking saturation.

Proposed Action

The DEAB holds the primary responsibility for recommending code changes to the County Council. I am asking this board to:

1. **Recommend an amendment** to the building code requiring a minimum of 40ft wide streets in high-density developments.
2. **Evaluate garage and driveway minimums** to ensure they can fully accommodate modern vehicles without those vehicles overhanging and blocking sidewalks or rolling curbs.

We cannot prioritize "density" at the expense of "survivability." I look forward to hearing how the DEAB plans to address these street-width concerns in upcoming recommendations to the Council.

Sincerely,

Janet L. Kelly
President
Friends of Central Vancouver

Current Resident of Cedar 49
9309 NE 83rd Ave
Vancouver, WA 98662

CC: Sue Marshall
Glen Yung
Wil Fuentes
Matt Little
Michelle Belkot
Kathleen Otto
Oliver Orjiako
Jose Alvarez
April Furth