

From: [Rebecca Messinger](#)
To: [Sue Marshall](#); [Glen Yung](#); [Michelle Belkot](#); [Wil Fuentes](#); [Matt Little](#)
Cc: karissa@friendsofclarkcounty.org; [Oliver Orjiako](#); [Cnty 2025 Comp Plan](#)
Subject: FW: Friends of Clark County's Comments on Concurrency
Date: Monday, June 22, 2026 11:05:50 AM
Attachments: [FOCC Comments on Concurrency June 2026.docx.pdf](#)
[image001.png](#)

Good morning,

I just want to make sure you receive the attached letter from Friends of Clark County pertaining to Concurrency.

For some reason, Karissa's email was quarantined so you may not have received it – just fyi. You may wish to check any emails titled “Microsoft 365 security: You have messages in quarantine” and see if Karissa Page is listed. Let me know if I can help.

Thank you,
Rebecca



Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305
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From: Karissa Page <karissa@friendsofclarkcounty.org>
Sent: Monday, June 22, 2026 9:27 AM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>
Cc: Ann Foster <annfoster5093@gmail.com>; Jim Byrne <byrnejim7@gmail.com>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: Friends of Clark County's Comments on Concurrency

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.

Hello,

Please accept the attached letter from Friends of Clark County for the record on the issue of concurrency.

Thank you,
Karissa



Friends of Clark County

PLANTING THE SEEDS OF RESPONSIBLE GROWTH

June 22nd, 2026

My name is Ann Foster. Jim Byrne and I are writing on behalf of Friends of Clark County (FOCC), a local non-profit advocacy organization representing its thousands of supporters, who are residents of Clark County, WA, to express our position regarding the issue of concurrency.

RCW 36.70A.070(6)(b) — The Concurrency Mandate, within the GMA states, "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 transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development."

Please note that the mandate states that the County "must adopt and enforce," not "may" or "should." The statute defines "concurrent with the development" to mean improvements are in place at the time of development or a financial commitment exists to complete them within six years.

FOCC's position is based upon accountability, or lack thereof, on the part of the County. (County Code) CCC 40.350.020 intends to keep critical (i.e., all) infrastructure in balance with development. When there is an increase in the number of houses, there first needs to be roads to accommodate increased traffic, and fire stations for an increased number of buildings. In short, infrastructure needs to be in place at the time of development; not provided afterward. The County Code says that when a road's volume-to-capacity ratio exceeds 0.90, development should be delayed until the condition is improved or mitigated. Transportation is the only criteria that requires the project be halted. Over and over again, there is evidence that the County is not following its State-mandated laws.

As residents, we rely upon our elected officials and County staff to do the right thing for us. This is why we pay taxes. Rewriting the code or a change to the code to accommodate development without infrastructure is an insult to those of us who live here, have built businesses here, who shop here, and to the future generations for whom we are responsible. It is a gift, however, to the development community.

We object to the consideration of an "interim" change in code to address the numbers on paper of development—smoothing the way to the approval of developments in the

pipeline and opposing the intent of the Climate Element as it is proposed in the 2025 Comprehensive Plan Update. Chapter 14.1, recommended by the Technical Coordinating Committee, stresses coordination among county jurisdictions and the critical implementation of goals and policies which achieve an overall target of reaching net-zero greenhouse gas emissions by 2050 if we are going to have any serious impact on severe climate events going forward. The Council has already selected more density in its vote on April 27 for the Preferred Alternative #2, which not only dismisses any consideration of prime ag land in some UGA expansions, but by doing so, opens up that land for residential buildings—increasing traffic pressures. Changing the code to make more shortcuts accessible decreases our ability to meet reachable GHG emission targets. The code is clear. There is no need for revision.

Friends of Clark County has long expressed concern over the County's inability to consistently follow its own codes and stay in alignment with the State of Washington's mandated Growth Management Act requirements for concurrency in its development practices. By changing the code, not the practice, the County shows itself unwilling to self-correct.

Thank you for your consideration,

Ann Foster and Jim Byrne
President and Policy Chair
Friends of Clark County Board of Directors