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| **From:** | Jeffrey Delapena |
| **To:** | hcpheidi@yahoo.com |
| **Cc:** | Oliver Orjiako; Jose Alvarez |
| **Subject:** | FW: Comments on density increases and lack of adequate infrastructure for Comp Plan work session |
| **Date:** | Tuesday, July 28, 2026 10:30:00 AM |
| **Attachments:** | Council_Memo_179th_Density_Balance.pdf |

Good day, Heidi,

Thank you for providing feedback related to the July 22nd Council Work Session. I apologize for the delay in response as I just returned after being out last week.

Your comments will be added to the Comprehensive Plan Index of Record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



-----Original Message-----
From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Saturday, July 18, 2026 5:44 PM
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: Kathleen Otto <Kathleen.Otto@clark.wa.gov>; April Furth <April.Furth@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Comments on density increases and lack of adequate infrastructure for Comp Plan work session



Dear Clark County Council,

Please find attached comments about the no cap density increases coupled with lack of adequate infrastructure for the items being reviewed in the Comp Plan work session this week.

Thank you,

Heidi

# MEMORANDUM

**TO:** Clark County Council
**FROM:** Heidi Pozzo
**DATE:** July 18, 2026
**RE:** State-Mandated Housing Density Is Being Concentrated in the Unincorporated Vancouver UGA (Including the 179th Street Corridor) Without the Infrastructure, Financing, Parks, Schools, or Employment Base the Growth Management Act Requires

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This memorandum is not an argument against the housing the State requires the County to plan for. Recent state housing law compels the County to provide capacity for a large volume of new housing — much of it lower-income — and to permit that housing at high density with reduced or eliminated parking. That is settled. The concern is what the Growth Management Act (GMA) requires on the other side of the ledger. The GMA is built on a balance: the land use and housing elements must be matched by adequate public facilities, by a realistic financing plan, and by a land use pattern that reduces per-capita vehicle miles traveled. The 2025–2045 Comprehensive Plan Update satisfies the housing side of that balance while the infrastructure, financing, parks, schools, employment, and VMT sides are either unmet or moving backward.

The combined effect of the changes is not visible from any single chapter, and the volume of material before the Council makes it easy to miss. The purpose of this memo is to walk through the specific changes, cite where each comes from, and show how they interact when applied to the unincorporated Vancouver Urban Growth Area — which, because each city plans its own UGA, is the portion of the County's growth the County itself must site, and which includes the 179th Street corridor.

### 1. This Update is the latest layer stacked on a deficit the County created and never cured

The problems in this memo did not begin with this Update, and they cannot be understood as if the corridor were a clean slate. The density now being enabled is the third layer added to an area that already could not support the first two:

**First — 2019: the urban holding was lifted, but the infrastructure was not delivered.** The County removed the urban holding on the strength of a six-year infrastructure-delivery commitment, and then did not deliver. The first corridor road work — the roundabout at NE 29th Avenue — is only beginning now, years late, while the rest of the corridor remains unfunded or pushed to 2029–2035 (179th Street Corridor Position Statement, February 16, 2026).

**Second — the County increased density in the same area.** Through this comprehensive plan the County upzoned and consolidated the medium- and high-density zones into fewer districts with higher minimum and maximum densities — the R-24, R-36, and R-50 consolidation (Decker memo, §B) — raising the density the area must absorb on top of the still-uncured 2019 deficit.

**Third — the implementing code now removes the ceiling entirely.** The code changes before the Council, described in the next section, add the exemptions that make density effectively unlimited: 100% residential conversion of commercial and mixed-use land, no maximum density for affordable, transitional, and permanent supportive housing, and no required parking.

Each layer has been added to ground that already could not support the one before it. That is why the concurrency, financing, school, and park problems below are not isolated defects — they compound, and this Update deepens a deficiency the County has left unaddressed since 2019.

**2. What is changing: the density-enabling code (largely state-driven)**

Four changes, read together, allow a very different kind of development than the districts were designed for. Each is documented in the County's own July 15, 2026 draft code and the accompanying code memo (Residential Code Updates Draft, Elizabeth Decker, JET Planning, July 15, 2026).

**One hundred percent residential on commercial land.** The Commercial Districts draft (CCC 40.230.010, July 15, 2026) adds a "Full Exception": a multifamily affordable housing project located in the Vancouver UGA is exempt from the requirement to include any commercial use if the applicant records a covenant of at least thirty years committing 100% of the units to an average of 60% of area median income or less. This applies to Neighborhood, Community, and General Commercial. In General Commercial there is no maximum building height and no minimum lot area (CCC 40.230.010, Tables 40.230.010-2 and -3). A district defined to "provide a full range of goods and services… to serve large areas of the county and the traveling public" may therefore be built with no commercial component at all.

**One hundred percent residential in Mixed Use, with no density cap.** The Mixed Use draft carries the same Full Exception (CCC 40.230.020(E)(1)(c)) and adds that there is no maximum density for affordable, transitional, or permanent supportive housing, or for vertical mixed-use buildings (CCC 40.230.020(E)(1)(e)). The stated 50 dwelling-units-per-acre ceiling does not apply to these projects.

**Supportive and transitional housing on the same terms — with the governing standards not yet written.** To comply with state law (including HB 1220), transitional and permanent supportive housing must be permitted wherever residential uses are allowed — mapping to the County's R1, R, OR, Commercial, and MX zones — and emergency shelter and emergency housing wherever hotels are allowed (CC conditionally, GC, and MX) (Decker memo, §H). These uses are being enabled now, but the special-use standards that would govern their siting and form remain a placeholder: CCC 40.260.076 (July 15, 2026 draft) states only that standards are "to be developed" pending forthcoming Department of Commerce guidance.

**Parking minimums reduced or eliminated.** Consistent with recent state parking legislation, the multifamily minimum drops to 0.5 space per unit, and off-street parking minimums are eliminated entirely for affordable housing, senior housing, and any dwelling under 1,200 square feet, as well as for commercial uses under 3,000 square feet and ground-floor uses in mixed-use buildings (CCC Table 40.340.010-4; Decker memo, §E). As the County's own memo puts it, in practice most multifamily dwellings will not be required to provide any off-street parking.

The cumulative result: on the same commercial and mixed-use parcels, a project can now be built with no commercial component, no density ceiling, and no required parking. Whether any individual piece is state-compelled or a local choice, the effect on the ground is the same, and it is the effect that must be balanced by infrastructure and financing.

**3. Where the density is being directed**

The County's own allocation shows the concentration. The growth the Update must accommodate countywide is on the order of 103,700 housing units and 88,500 jobs (City of Vancouver written testimony, dated November 6, 2024, entered into the Comprehensive Plan Index of Record; corroborated by Appendix J, Housing for All Planning Tool, showing 103,695 units). Of that total, roughly 44,000 units — about 43% — are allocated to the unincorporated Vancouver UGA plus rural Clark County, under a method Appendix J describes as having the "Vancouver unincorporated UGA absorb the remainder." The majority of that allocation falls in the income bands at or below 80% AMI — precisely the units the Full Exception, the no-maximum-density carve-out, and the parking elimination are written to serve. Because the cities plan their own UGAs, this is the share the County must physically site, and it lands in the unincorporated UGA that includes the 179th corridor.

**4. The infrastructure to support this density is not in place or funded**

The GMA does not let the housing and land use elements stand alone. The capital facilities element must inventory existing facilities, forecast need, and include at least a six-year financing plan within projected funding capacities — and if probable funding falls short of need, "the future land use element must be reassessed" (RCW 36.70A.070(3)). The transportation element carries a parallel concurrency-and-financing obligation and its own reassessment requirement (RCW 36.70A.070(6)). And GMA Goal 12 requires that public facilities necessary to support development be adequate and available concurrent with the development (RCW 36.70A.020(12)).

In the 179th Street area, the funded road improvements consist of the work at the Interstate 5 interchange and approximately one mile east to NE 29th Avenue, including the roundabouts. That is the extent of it. The segment east of NE 29th to NE 50th, and the roundabout at NE 50th, are not funded, and no other projects are funded to support this level of development. Construction start dates for corridor projects have been pushed to 2029, with eastern segments to 2031 and 2035 or later (179th Street Corridor Position Statement, February 16, 2026, citing the County's January 6, 2026 presentation to the RTC Board of Directors). Because these are start dates, completion extends well into the 2030s — far beyond any six-year concurrency window. Water and sewer are likewise being constructed reactively and are not available at property lines across large portions of the corridor.

**The corridor is already failing concurrency, and the planned roads will not cure it.** Setting funding aside, the area already experiences concurrency problems — volume-to-capacity exceedances at existing locations that place it at or beyond the County's adopted level-of-service standards (RCW 36.70A.070(6); CCC 40.350.020). The Council has heard the specifics of these exceedances in prior comment. The decisive point for this Update is that the failures appear in the traffic studies provided by developers which model the network as built out — that is, after the planned corridor improvements are assumed complete. The funded road projects would therefore not resolve the level-of-service deficiencies even after they were built. Adding density to a corridor that fails concurrency in the modeled, fully-improved condition is not a future risk to be managed; it is a present deficiency being deepened.

**The shortfall is not just local; it is systemwide.** The County's own 20-year transportation Capital Facilities Plan projects $1,605.8 million in expenditures against $1,021.3 million in revenue — a shortfall of roughly $584.5 million, about 36% of the total projected capital cost (Appendix A, Transportation Capital Facilities Plan, Tables 11 and 12). The GMA requires only the six-year Transportation Improvement Program to be financially constrained and balanced; as the County acknowledges, the 20-year CFP "is more speculative and is not required to be balanced," and the bulk of its assumed revenue — grants and impact fees — is back-loaded to the 2032–2045 period. In other words, the money to build out a rural-edge corridor like 179th sits in the speculative, unbalanced portion of the plan. Given the scale of that gap, there is no realistic basis to conclude that this corridor will receive the funding needed to close its infrastructure deficit.

Layering uncapped residential density, with reduced or no parking, onto a corridor whose road and utility improvements are largely unfunded — within a countywide program that is itself short by more than half a billion dollars — does not meet the concurrency and financing tests the GMA imposes. Under RCW 36.70A.070(3), where the funding is not there, the land use allocation is what must be revisited.

### 5. Eliminating parking minimums assumes alternatives that do not exist here

Removing off-street parking minimums is defensible in a dense, transit-rich urban core, where residents can reasonably walk, bike, or ride transit instead of owning a car. That premise does not hold in this corridor. The area is served by rural roads, many without shoulders; sidewalks are missing or disconnected; and transit is limited or absent — the RTC has confirmed that no fixed-route transit is planned for NE 179th Street (DEIS Q&A record, response to Question 25). Eliminating the parking requirement in that setting does not reduce car ownership, because households have no alternative to the car; it simply removes the obligation to provide anywhere to put the cars they will still own. The predictable result is vehicles parking on shoulderless rural roads and disconnected frontages — a safety and access problem that shifts a private cost onto the public roadway. Parking elimination that assumes multimodal choices should not be applied to an area that lacks them, and doing so compounds, rather than mitigates, the corridor's infrastructure deficit.

**6. The added density will not be served by adequate parks**

**What the code requires of a development is not usable open space.** The Council may reasonably assume that dense housing arrives with usable open space. The code's definitions do not require that. The multifamily amenity-area requirement has been reduced to 5% of the developable area (CCC 40.260.150(C)); the County's own worked example shows a project's required amenity dropping from 12,200 to 4,175 square feet (Decker memo, §D). Up to half of even that 5% may be satisfied by private balconies, patios, decks, and porches as small as 48 square feet (CCC 40.260.150(D)). And the plan's definition of "Open Space" is land or water that is "essentially unimproved" and devoted to natural-resource preservation, outdoor recreation "not requiring development of play fields or structures," or "public health and safety (flood control)" (Glossary) — a definition that counts stormwater and flood-control facilities (detention and retention ponds) and unimproved sensitive-land buffers, and expressly excludes the improved play fields and facilities people picture as a park. The commercial standard reinforces this by letting stormwater facilities satisfy required landscaping at a one-to-one ratio (CCC 40.230.010(D)(4)). The on-site "open space" accompanying this density can therefore be balconies, ponds, and buffers — not parks.

**And no new public parks are being built to make up the difference.** The more serious problem is that the County is not developing the public parks this density will need. The Parks element sets a level-of-service standard of six acres per 1,000 residents and already documents a deficit against it in both acquisition and development (Parks Element, Chapter 7, Table 7.2). Parks are not adequately funded for operations and maintenance of the system that already exists: the plan itself seeks "higher levels of general fund support for operations and maintenance of regional parks" and looks to stabilize the parks district's finances (Parks Element, Policies 7.8.4 and 7.10.3), and it concedes that park standards may not be attainable in certain areas because of existing and proposed development. Where the County cannot fund the operation and maintenance of the parks it has, it is not developing new ones. This Update directs new density across the UGA, on both sides of Interstate 5; the park deficiency, however, is concentrated on the east side. The County's large parks are on the west side of I-5 — miles from the east-side neighborhoods, and reachable only by car. Regional acreage that may look adequate in a countywide total therefore does not serve east-side residents as usable, walkable neighborhood parks, and requiring them to drive across I-5 to reach a park runs directly against the plan's own VMT-reduction obligation. The result is a significant and growing park deficit on the east side, where no new parks are being developed to serve the added population. Adding tens of thousands of residents to an area that is not receiving new parks, while simultaneously reducing the on-site amenity those residents would otherwise have, does not meet the capital-facilities and level-of-service obligation the GMA imposes (RCW 36.70A.070(3)).

**7. Jobs and VMT: the County was already warned, and these changes make it worse**

HB 1181 requires the County to reduce per-capita vehicle miles traveled through its comprehensive plan, including the land use element (RCW 36.70A.070(9)). The City of

Vancouver has already told the County, on the record, that it will not be able to meet that requirement in the Vancouver UGA as planned. In written testimony dated November 6, 2024 and entered into the Comprehensive Plan Index of Record, the City stated that achieving VMT reductions is “likely impossible” without allowing related land uses to locate nearer to one another; that the Vancouver UGA is uniquely challenged because so much of its existing housing sits miles from the nearest commercial services or employment; that the City’s own analysis identifies the lack of employment land in the UGA as a major contributor to congestion as people commute long distances to jobs, including into Oregon; and that the proposed mapping added no new commercial or employment designations to fix this. The City tied its warning to Countywide Planning Policy 1.4.1 (commercial activities and the residential areas they serve should locate near one another) and to WAC 365-196-310(4)(b)(iv) (increase capacity in existing urban areas before expanding UGAs).

The changes in Section 2 make that documented problem worse. They permit the commercial and mixed-use land — the very employment and services land the City said the UGA lacks — to convert entirely to residential, removing co-located jobs at exactly the locations where VMT reduction depends on adding them. This also contradicts the County’s own Economic Development Element, which directs the County to “protect employment center lands from conversion to residential” and acknowledges a documented shortage of development-ready employment sites (Economic Development Element, Chapter 9, citing the 2011 CREDC Clark County Employment Land Inventory). The GMA requires the plan to be internally consistent across its elements (RCW 36.70A.070).

**The employment base is about to shrink further.** The County’s forthcoming selection of a waste-transfer facility site is expected to consume a large parcel currently designated for light industrial (a pending County siting decision). A transfer station is a low-employment use that yields few jobs per acre; siting it on light-industrial land therefore removes employment-designated ground from an already-short inventory while adding little of the employment the corridor needs. Combined with the commercial and mixed-use conversions above, the plan is reducing the jobs base in precisely the area where the City of Vancouver has said more jobs are required to comply with HB 1181. A plan that concentrates roughly 44,000 mostly lower-income units in the unincorporated UGA while allowing the surrounding employment land to become housing or low-job uses is not planning for VMT reduction; it is planning for longer car trips.

**8. This level of density strains the school systems, and the school plans do not account for it**

**The density this Update newly authorizes is a requirement the school plans were never built to meet.** The changes described in Sections 2 and 3 create entitlements that did not exist when the school districts prepared their capital facilities plans: the conversion of commercial and mixed-use land to 100% residential, the elimination of any maximum density for affordable, transitional, and permanent supportive housing, and the uncapped densities in the Mixed Use zone. The carried-forward plans were calibrated to the densities in effect when they were drawn in 2022. They could not have forecast — and did not forecast — the enrollment generated by housing this plan is only now authorizing. The student-generation projections on which the County would rest a school-adequacy finding therefore omit, by construction, the students this Update will produce. The County cannot find, under RCW 36.70A.070(3), that school facilities are adequate to serve densities the plans were never asked to absorb. This is a new requirement created by this Update, and the school plans do not account for it.

**Compounding the problem, the plans are not even current.** Under CCC 40.620.030(A), a school district requesting impact fees must "submit to the county, and update at least every four (4) years, a capital facilities plan adopted by the school board." The four-year clock attaches to the district's act of submitting — the operative verb is "submit… every four years"; "adopted by the school board" describes which plan must be submitted, not the event that starts the clock. Submittal under (A), Planning Commission review under (B), and Council adoption of fees under (C) are three distinct steps, and the Council-adoption date under (C) does not reset the district's submittal cycle under (A). The carried-forward districts last submitted in 2022; of the six districts reviewed at the August 18, 2022 hearing, only Washougal is resubmitting, while Battle Ground, Camas, Green Mountain, Ridgefield, and Vancouver are carried forward on their 2022 plans on the theory that the clock runs from the Council's 2023 adoption (see Heidi Pozzo comment letter, July 6, 2026; and the districts' response, LeAnne M. Bremer, Miller Nash LLP, memorandum to the Planning Commission, July 13, 2026). That reading would let a district postpone updating indefinitely whenever the County's own adoption lagged. And the 2022 data itself was assembled on the heels of the pandemic, before the growth that followed the lifting of the 179th urban holding — let alone the new density in this Update — was captured. Data that predates the growth cannot support a current adequacy finding, regardless of how the four-year clock is read.

**Two facts from the districts' own submissions sharpen the point.** First, the new facilities to serve growth are funded overwhelmingly by public money, not developer contributions — 92% to 96% public versus 4% to 8% impact fees across the districts (Bremer memorandum, July 13, 2026) — so adequacy depends on bonds and levies, which are not assured where voters have rejected them. Second, a new impact-fee methodology due next year will scale school impact fees down for smaller units to produce a "proportionally lower impact fee for smaller housing units" (id.). The dense, small, affordable units this code drives into these districts will therefore generate even less school-facility funding per unit — against enrollment their plans never counted. At the August 18, 2022 hearing, County staff told the Planning Commission that all ten districts' revised plans would be reviewed together as part of the next Comprehensive Plan update. This is that update, and for five districts it is not happening. It is also a distribution problem: parts of the county's school system have flat or declining enrollment and available capacity, yet this Update concentrates new density in districts whose plans do not reflect it, rather than directing growth toward the capacity that already exists.

## 9. The balance the GMA requires — and what the record needs before adoption

Housing, infrastructure, and finance are meant to be planned together. Right now the Update carries the housing obligation forward while leaving the other elements unmet: the road and utility improvements for the density are largely unfunded and sit within a countywide transportation program short by more than half a billion dollars; parking minimums are eliminated in an area without the sidewalks or transit that would justify it; on-site amenity is defined down to balconies and ponds while public park adequacy goes unaddressed; the school record rests on stale 2022 data with no current submittal from five districts; and the employment and VMT requirements move in the wrong direction against an express warning from the City of Vancouver. Underlying all of it is a distribution choice compounded by history: the Update pushes growth and density to the edge of the growth area — where roads, utilities, parks, and school capacity do not exist and are not funded — rather than toward areas inside the UGA that already carry public investment and, in the school system, available capacity. And it does so as the latest layer on a deficit the County created when it lifted the urban holding in 2019 without delivering the infrastructure it promised.

Before adoption, the record should be made to reflect that balance. Specifically: (a) a funded capital facilities and financing plan that actually supports the density being enabled in the unincorporated Vancouver UGA, with the land use and housing allocation reassessed where probable funding falls short, as RCW 36.70A.070(3) requires; (b) transportation concurrency and financing for the 179th corridor beyond the Interstate 5-to-29th segment, addressed against the countywide $584.5 million shortfall rather than around it; (c) current school capital facilities plans submitted by the five carried-forward districts, and a school-adequacy finding based on current data rather than 2022 figures; (d) funded development, operation, and maintenance of public parks sufficient to serve the added population on the east side of Interstate 5, consistent with the Parks element's own six-acre-per-1,000 level-of-service standard; (e) the co-located commercial and employment designations the City of Vancouver identified — not the further loss of employment land to residential conversion and low-job uses — so the plan can actually demonstrate HB 1181 VMT compliance; and (f) reconciliation of the commercial and mixed-use residential-conversion allowances with the Economic Development Element. Each of these issues is raised here so that it is preserved in the record before the Council acts.