

From: [Jeffrey Delapena](#)
To: ["Heidi Pozzo"](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: July 29 Work Session — School and Fire District CFPs and Impact Fees (Fire: CPZ2025-00010 through -00013)
Date: Tuesday, July 28, 2026 2:01:00 PM

Good day, Heidi,

Thank you for providing feedback related to the July 29th Council Work Session.

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

Best,

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Subject: July 29 Work Session — School and Fire District CFPs and Impact Fees (Fire: CPZ2025-00010 through -00013)

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Dear Clark County Council,

I am writing on both the school and fire district capital facilities plans and impact fees before you at the July 29 work session. I support both school and fire districts having impact fees available as a funding tool — growth imposes real capital costs on both systems, and new development should pay its proportionate share. My concerns go to how these particular plans were prepared and carried forward, not to the use of impact fees themselves.

School Districts

Five districts are being carried forward this cycle without an updated capital facilities plan — Battle Ground, Camas, Green Mountain, Ridgefield, and Vancouver — and my focus is on Ridgefield and Battle Ground.

1. The required four-year submittal was not made, and it is separate from the impact fee. County code requires each district that collects impact fees to submit and update its capital facilities plan at least every four years (CCC 40.620.030(A)); these five districts last submitted in 2022, so that has not been done this cycle. Contrary to the districts' position that the clock starts at Council adoption, the code makes the district's four-year submittal (subsection A) a step distinct from the Council's later adoption of the impact fee (subsection C) — the 2023 adoption date does not restart the district's submittal clock. Staff told the Planning Commission in 2022 that all ten districts' revised plans would be reviewed together at this Comprehensive Plan update, which is not happening; and the code requires ongoing oversight of every fee-collecting district: "The planning commission shall submit an annual report to Council for each school district for which school impact fees are collected" (CCC 40.620.030(B) (3)).

2. Ridgefield in particular is growing while most other districts are shrinking — its enrollment rose about 19% over the past five years while most districts declined — which requires Ridgefield to build new schools even as others have capacity to spare. Yet the plan the County is carrying forward for Ridgefield was compiled in 2022, on the heels of the pandemic; it predates much of the growth now arriving, including from the 2019 lifting of the 179th-corridor urban holding, and its 2022 cost estimates have since been outrun by construction-cost escalation. The same staleness affects Battle Ground's carried-forward plan.

3. Breaking out needs by school is a code requirement, not a preference. A capital facilities plan must state the proposed locations and capacities of each expanded or new facility (RCW 36.70A.070(3)(c); WAC 365-196-415(1) (c)) — an element the County's own staff listed as required when it reviewed these plans in 2022. Ridgefield's plan does not do this: it lumps its entire need into one line, "New K-8 Schools (2,132 capacity)" at \$195 million, without identifying the individual schools, their locations, or their costs.

4. The comprehensive plan's environmental review carries all of this forward. The Final EIS draws its school capacity figures directly from these 2022 plans (Tables 82 and 91) and concedes that many planned projects remain "partially funded or unfunded," yet the plan relies on them to treat school capacity as adequately addressed.

My full analysis is in my comment memo dated July 6, 2026, in the Planning Commission's public comment record for the 2025 Comprehensive Plan Update. I ask the Council to enter that memo into the record and to require the five carried-forward districts to submit current capital facilities plans as part of this update.

Fire Districts

I submitted written comments on all four fire district Capital Facilities Plans on July 6 ahead of the July 16 Planning Commission hearing. All four staff reports state that no public comments were received, and the issues I raised were not discussed. The case materials are on the Planning Commission page for that hearing, which is linked from the Council agenda, and I am glad to send copies of my letters.

Growth drives call volume, call volume wears out apparatus faster than it used to, and the districts are right to seek a mechanism for it. My concern is that this is the first time the County's framework has been exercised since it was adopted in February 2024, and the first run has surfaced a number of items that should be resolved before adoption. Three are common to all four districts:

1. The County's code does not say what a district may charge for. CCC 40.610.020 lists "Fire District facilities" as a public facility but never defines the term to outline what types of equipment can be included, and CCC 40.620.060 defines every input to the fee formula as whatever the district put in its own plan. The code also tells districts to list projects that fix existing deficiencies and replace worn out equipment in the same list as growth projects, with no way to tell them apart, even though state law does not allow impact fees to pay for the first two. Faster apparatus replacement caused by rising call volume is a fair basis for a fee, but that case has to be shown with data, and nothing in the code asks for it. Fire District 3 is charging new development 40% of a \$10,740,000 remodel of an existing station with no such showing.

2. Revenue the voters already approved for these same facilities is not reflected. Fire Districts 3 and 6 and Clark-Cowlitz Fire Rescue each ran levy lid lifts that voters approved in August 2024, presented as funding for capital needs. Most of the plans do not show dates of board adoption, but they were prepared and adopted over that same period, and none of them acknowledges the levy revenue or adjusts the fee for it. State law requires the calculation to account for other funding available for the same facilities. The underlying data is mostly from 2022 and 2023, and the plans were not updated before they were transmitted to the County in June 2026.

3. The plans say there are no existing service deficiencies, and their own data says otherwise. This matters because impact fees cannot be used to fix service problems for existing residents. Clark-Cowlitz Fire Rescue's plan reports that it meets its rural fire response goal 66% of the time and its EMS goal 68%.

Beyond these, there are a number of additional items that vary by district: growth-share percentages that are inconsistent or unexplained, competing fee figures within the same staff report, and new stations with no stated location or size. My letters take each district separately.

I ask the Council to enter my four fire comment letters into the record and to direct staff to resolve these items before the plans return for adoption — or, in the alternative, to defer action on the four cases. Getting the framework right on this first pass will make every future district plan easier to review and harder to challenge.

Thank you for your consideration.

Heidi