

From: [Jeffrey Delapena](#)
To: [Rebecca Messinger](#); hcpheidi@yahoo.com
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: RE: Parks Inadequate to Support Current Residents and Growth
Date: Tuesday, July 28, 2026 3:50:00 PM

Hello Heidi,

Confirming receipt in Planning as well! This will also be adding to the Comp Plan Index of Record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

-----Original Message-----

From: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Sent: Tuesday, July 28, 2026 2:49 PM
To: Heidi Pozzo <hcpheidi@yahoo.com>; 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>; Michelle Pfenning <Michelle.Pfenning@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: RE: Parks Inadequate to Support Current Residents and Growth

Hello Heidi,

This is to confirm receipt of your comments. They will be added to our record.

Thank you,

Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305
Email: Rebecca.Messinger@clark.wa.gov

-----Original Message-----

From: Heidi Pozzo <hcpheidi@yahoo.com>

Sent: Tuesday, July 28, 2026 2:09 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>; Michelle Pfenning <Michelle.Pfenning@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: Parks Inadequate to Support Current Residents and Growth

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.

Dear Clark County Council,

Please find attached my comments about the current inadequacy of parks on the east side of I-5 to support current residents, and worsening under the Preferred Alternative. This is one of many elements that are not balanced in the Comp Plan.

Thank you for your consideration,

Heidi

July 28, 2026

To: Clark County Council
From: Heidi Pozzo

Re: 2025–2045 Comprehensive Plan Update — comment on the park and recreation element and the capital facilities plan element

Parkland Adequacy in the NE 179th Street Corridor
Analysis for the 2025–2045 Comprehensive Plan Update Record

Summary

The unincorporated Vancouver Urban Growth Area corridor bounded by Interstate 5 on the west, NE 50th Avenue on the east, NE 134th Street and NE Salmon Creek Avenue on the south, and NE 209th Street on the north is served by parkland the plan’s own level-of-service standard cannot reconcile with the growth being directed to it. The corridor is underserved today. The topography and street network within it make the service areas of the parks that exist materially smaller than the County’s distance-based measure assumes. And the plan concentrates dense, small-lot residential development into that corridor without funding the parkland its own standard requires.

The County holds 13.98 acres of neighborhood parkland within the corridor, of which 9.98 acres are developed, and no community parkland at all, against a twenty-year obligation of approximately 99 acres. The single park serving the northern portion of the corridor is Kozy Kamp Neighborhood Park, developed in 2024, comprising 4.98 acres of which approximately one quarter is fenced wetland, leaving roughly 3.74 acres of accessible parkland. At the adopted standard of five acres per 1,000 residents, 4.98 acres provides for 996 people and 3.74 acres for 748. Residential development already approved and in pre-application within the corridor will add approximately 6,941 residents, concentrated in that northern portion.

The County’s capital program does not close this gap and does not represent that it will. The draft 2027–2032 Parks and Lands Capital Improvement Plan programs \$112,151 of park land acquisition in Park Impact Fee District 10 across the entire six-year period, programs no park land acquisition in any district in 2029 through 2032, and states that its project list does not represent a development schedule that will keep up with the level-of-service standard in the adopted Parks, Recreation and Open Space Plan. RCW 36.70A.070(3) requires the capital facilities plan element to identify the proposed locations and capacities of expanded or new facilities and to finance them within projected funding capacities, provides expressly that park and recreation facilities shall be included in that element, and requires reassessment of the land use element where probable funding falls short of meeting existing needs. RCW 36.70A.070(8) requires the park and recreation element to implement and be consistent with the capital facilities plan element. The opening paragraph of RCW 36.70A.070 requires internal consistency. Those requirements are not met here.

The adopted standard and how the County measures service

The 2022 Parks, Recreation and Open Space Plan establishes for the Vancouver urban unincorporated area a combined neighborhood and community parkland acreage standard of five acres per 1,000 population, an acquisition standard of six acres per 1,000 comprising three acres of community parks, two acres of neighborhood parks and one acre of natural areas, and a separate development standard of 4.25 acres per 1,000 comprising 2.25 acres of community and two acres of neighborhood parkland. As of 2020 the urban unincorporated area stood at 89 percent of the acquisition standard and 60 percent of the development standard, projected to fall to 77 and 52 percent by 2030. The draft park and recreation element in this update reduces the combined standard from six acres per 1,000 to five. The analysis below uses five, the lowest figure in the County's own documents; Final Environmental Impact Statement Table 88 reports unincorporated Clark County as applying a Greater Clark Parks District standard of ten acres per 1,000 and as currently providing seven, below level of service.

The standard is not only an acreage ratio, and its service definitions are codified rather than merely aspirational. Clark County Code 40.100 defines a neighborhood park as a public park designed to provide nonorganized recreational opportunities for residents living within a one-half-mile radius, located such that it is within walking and bicycling distance of most users, generally containing three to five acres; and a community park as a public park serving residents from a one- to three-mile service area. The park and recreation element adds that neighborhood park sites should be located so that persons living within the service area will not have to cross a major arterial street to reach them, and that community parks, at twenty to one hundred acres, require support facilities including parking and restrooms. The gap analysis in the Parks, Recreation and Open Space Plan implements those definitions by calculating travel distances along the road network from accessible access points — half a mile for neighborhood parks, three miles for community parks. Service is therefore a function of whether residents can reach a park, not of how many acres exist within a district.

The corridor is underserved today

The County reports park level of service at the park impact fee district scale, and at that scale District 10, which contains the corridor, appears well served.

Table 1. Park Impact Fee District 10 level of service as reported, and recomputed on developed acreage. Acreage and population from PROS Plan Figure 11; reported percentages and grades from Figure 32. Population within service area, 21,613.

Measure	Acres	Per 1,000	Percent of standard	County grade
<i>As reported by the County — total owned acreage</i>				
Neighborhood parks (2 ac/1,000)	47.6	2.20	110.1%	A+
Community parks (3 ac/1,000)	76.2	3.53	117.6%	A+
Urban natural areas (1 ac/1,000)	66.4	3.07	307.1%	A+
Service area within a neighborhood park walkshed	—	—	27.7%	F
<i>Recomputed on developed acreage</i>				
Neighborhood parks (2 ac/1,000)	20.9	0.97	48%	—
Community parks (3 ac/1,000)	30.2	1.40	47%	—

The two sets of figures are not inconsistent, and the arithmetic reconciles them. The reported percentages are computed on total owned acreage: 47.6 acres of neighborhood parkland and 76.2 acres of community parkland, divided by the reported population of 21,613, return 110.1 and 117.6 percent of standard, which is what the County publishes. Of that neighborhood acreage, however, only 20.9 acres are developed, and of the community acreage only 30.2. Recomputed on the parks that exist, the district stands at 48 percent of the neighborhood standard and 47 percent of the community standard. Fifty-six percent of the neighborhood acreage behind the A-plus grade is land the County owns and has not built.

The walkshed measure asks the question the element actually poses — whether residents can reach a park — and answers that nearly three quarters of the district’s residential service area cannot. That is the lowest figure of any district in the system and the only F grade assigned on that measure. It is also what the per-capita measure looks like once undeveloped land is excluded from it. This is the County’s own finding of present deficiency, made before any of the growth at issue in this update arrives.

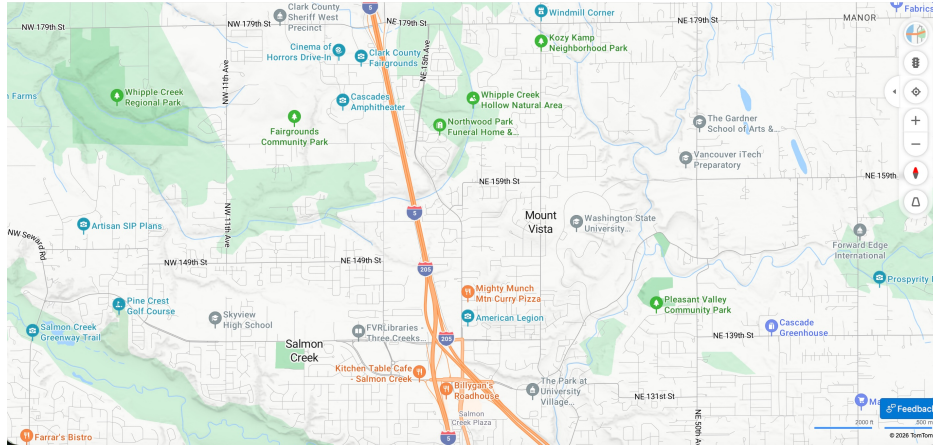


Figure 1. Park locations in and around the NE 179th Street corridor. Base map © 2026 TomTom, © OpenStreetMap contributors.

Within the corridor the County holds three neighborhood park sites — Vista Meadows, developed in 2006; the Mount Vista property, owned but not yet built; and Kozy Kamp, developed in 2024 — and no community parkland. Kozy Kamp is the only park in the entire area north of the Mount Vista ridge, which extends through all of the new development and continues to NE 209th Street.

Why the real service areas are smaller than the measure assumes

The County’s walkshed analysis measures network distance and nothing else. Four conditions within this corridor make actual service areas smaller than that measure reports, and each is documented in the County’s own materials.

Topography creates a natural barrier the walkshed measure cannot see. Figure 2 shows ground elevation along the NE 29th Avenue centreline. From the area of new development at NE 179th Street, at 250 feet, the ground rises 174 feet to a crest of 424 feet near NE 155th Street, then falls 282 feet to 142 feet at NE 134th Street and NE Salmon Creek Avenue. A distance that is unremarkable on level ground is not unremarkable across that relief. A parent pushing a stroller will go only so far up a hill; so will a child on a bicycle, an older resident walking, or anyone using a mobility device. The effective service area of every park in the corridor is therefore smaller than its nominal radius, and the reduction runs in both directions — a park at the top of the ridge does not serve the neighborhoods below it, and a park below does not serve the neighborhoods above. Grade is a recognized accessibility variable in County practice: the draft transportation Americans with Disabilities Act Transition Plan defines an accessible pedestrian access route as continuous and unobstructed consistent with applicable accessibility criteria and identifies steep running and cross slopes as barriers requiring corrective action, and the transportation capital facilities evaluation framework commits the County to communities where daily needs can be met within a convenient and safe walk, ride, roll or transit ride. No grade term appears anywhere in the parkland walkshed methodology.

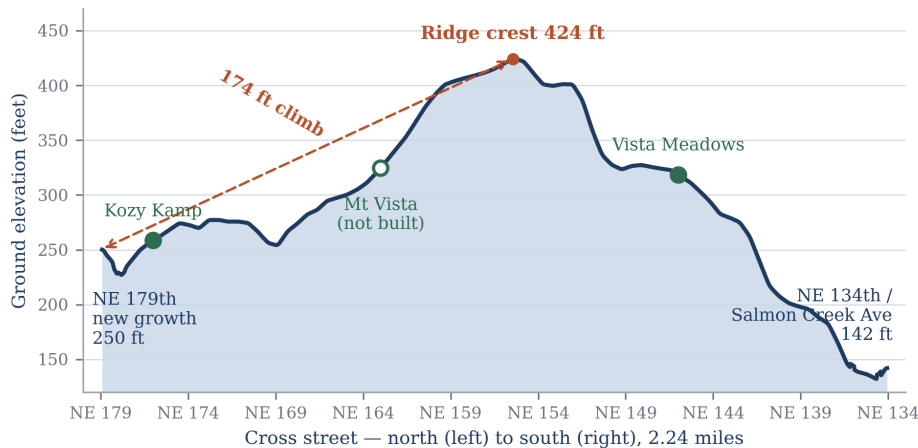


Figure 2. Ground elevation along the NE 29th Avenue centreline, NE 179th Street to NE 134th Street. Source: U.S. Geological Survey 3D Elevation Program, 1/3 arc-second bare-earth digital elevation model, sampled at 148-foot intervals.

Sidewalk discontinuity. Transportation Element Table 5.01 reports 424.2 miles of missing urban sidewalk on the county-owned network in the unincorporated Vancouver Urban Growth Area, of which 347.1 miles are on local streets primarily serving residential areas, and states that 464 miles are required to achieve a fully connected network. The same chapter explains the cause: new development in the unincorporated urban growth area is required to construct sidewalks, but road modification requests, boundary line adjustments, project phasing and proportionality analysis have allowed development to occur without providing the needed infrastructure, with the cost transferred to taxpayers. Routes that a network-distance calculation treats as walkable are in fact discontinuous, and the County has documented both the extent and the reason.

Scarcity of connecting streets. Between NE 134th Street and NE 179th Street the corridor is crossed by only a handful of east-west routes. Two lie at the top of the Mount Vista ridge — NE 159th Street, and NE 155th Street where it becomes NE 157th Street. The next two, where the terrain flattens, are NE 144th and NE 139th Streets in the vicinity of Vista Meadows. None serves the area of new development. East of NE 29th Avenue to NE 50th Avenue there is no east-west connection at all. North of NE 179th Street the next east-west route is NE 199th Street, most of which remains in a rural section with no sidewalks. Network distances are accordingly far longer than straight-line distance suggests, and the County's own wayfinding materials illustrate the effect: its published directions to Whipple Creek Hollow Natural Area from the Interstate 5 and NE 134th Street interchange run six legs over four different streets.

The arterial crossing. Kozy Kamp lies south of NE 179th Street. Much of the development it is relied upon to serve lies along and north of that street. Reaching the park therefore requires crossing NE 179th Street — the condition the park and recreation element instructs the County to avoid when siting neighborhood parks, on the corridor's principal arterial, which does not meet the adopted concurrency standard and whose remaining improvements are unfunded or not scheduled to begin construction before 2031 and 2035. Completion of the NE 179th Street improvements between Interstate 5 and NE 29th Avenue, if the 2031 schedule holds, would not

resolve the access problem. The north-south routes feeding that arterial would remain few, and those that exist remain in rural sections without connected sidewalks. An improved arterial does not create a pedestrian route to a park where the connecting streets do not carry one.

Two consequences follow. Residents drive to a facility built at neighborhood scale: Kozy Kamp has no parking and no restrooms, consistent with a park intended to serve only its immediate half-mile, and the households beyond that half-mile who use it arrive by vehicle and park on surrounding streets. And because Kozy Kamp is the newest park in the corridor and its play equipment is better than that at Vista Meadows, developed in 2006, it draws users from beyond its own service area who arrive by vehicle. The park bearing the entire burden of new growth is also the park that attracts demand from the rest of the corridor, and it has nowhere to put the vehicles that demand arrives in.

The growth being concentrated into the corridor

The residential base the parkland standard must serve is the sum of existing housing, development approved and under construction, development in pre-application, and the additional growth the plan authorizes over the twenty-year horizon. Housing units are converted to residents at 2.44 persons per household with a six percent vacancy allowance, except for existing units, for which the Office of Financial Management reports resident population directly.

Table 2. Residential base subject to the parkland standard.

Component	Housing units	Residents	Source
Existing housing (2025)	5,518	12,854	OFM Small Area Estimates Program
Approved / under construction	2,461	5,645	Corridor development tracking
Pre-application	565	1,296	Corridor development tracking
Subtotal, existing and known	8,544	19,794	
Estimated additional growth to 2045	8,300	19,037	Approval rate 2019–2025 projected forward
Twenty-year total	16,844	38,832	

The estimated additional growth is derived from the County’s own approval record. More than 2,900 units were approved in the corridor between 2019, when the urban holding overlay was removed, and 2025 — roughly 415 annually. Projected across the twenty-year horizon at that same rate, approximately 8,300 additional units would be approved beyond those already in the pipeline. The rate is conservative: the 2019 through 2025 period includes the pandemic and the subsequent interval of elevated interest rates, both of which suppressed residential construction below what the corridor’s zoned capacity would otherwise have produced.

Taken together, the pipeline and the projection would place approximately 11,326 new housing units in the corridor over the twenty-year horizon, which is between roughly a quarter and a third of the unincorporated Vancouver Urban Growth Area’s twenty-year allocation depending on which of the two figures above is used. That share is consistent with the corridor’s role in the plan rather than in excess of it. The corridor is the principal remaining undeveloped portion of the unincorporated urban growth area, the Hazel Dell, Orchards and Salmon Creek areas being substantially built out; it was brought within the urban growth area and released from urban holding for the purpose of accommodating growth; and the Preferred Alternative increases its permitted density further. A growth share exceeding the corridor’s share of the urban growth area’s land base is the expected result of a capacity-based allocation when the developable land is concentrated in one place.

The 3,026 units already approved or in pre-application account for approximately 6,941 residents and are concentrated in the northern portion of the corridor, where Kozy Kamp is the only park. At five acres per 1,000, that known growth alone generates an obligation of approximately 34.7 acres. Measured in facilities rather than acres, and using the element’s own definition of a neighborhood park as three to five acres, it requires three to four neighborhood parks and a community park at the minimum size the element contemplates.

Table 3. Parkland required by approved and pre-application growth (6,941 residents, from Table 2).

Approved and pre-application growth	Standard	Acres owed	Acres developed	Deficit
Neighborhood parks	2 ac/1,000	13.9	4.98	8.9
Community parks	3 ac/1,000	20.8	0.00	20.8
Combined	5 ac/1,000	34.7	4.98	29.7

The plan authorizes substantially more. The Final Environmental Impact Statement states the Vancouver Urban Growth Area allocation in two places, and the figures differ. Table 2 assigns the unincorporated Vancouver Urban Growth Area 32,552 housing units; Tables 65 and 68 use 40,463. The difference is not rural land, which appears as its own line in both tables, but a reallocation between the City of Vancouver and the unincorporated urban growth area. Relative to Tables 65 and 68, Table 2 moves 7,911 units out of the unincorporated urban growth area — 7,585 of them to the City of Vancouver and 326 to rural Clark County — and both tables total the same 103,695 units countywide. Footnote 4 to Table 2 explains the change, stating that the Vancouver figures are based on the City of Vancouver’s own environmental impact statement and adopted comprehensive plan, that they differ from the allocation in Resolution 2024-05-05, and that adjustments were proposed at the April 27, 2026 County Council hearing on the Preferred Alternative to reduce excess capacity in the Vancouver urban growth area. Table 2 reflects the current allocation; Tables 65 and 68 retain the superseded figures. This analysis uses 32,552.

The reallocation is itself informative. In April 2026 the County reduced the unincorporated Vancouver Urban Growth Area’s twenty-year housing allocation by roughly 7,900 units on the express ground of reducing excess capacity there. It adjusted the allocation without adjusting the facilities. Of the 32,552 units that remain, 19,370 — 59.5 percent — are allocated to households at or below 80 percent of area median income, against 51.8 percent countywide and 47.6 percent in the City of Vancouver. The part of the county carrying the highest proportion of low-income housing allocation is the part with the least parkland and the fewest means of reaching it.

The plan also replaces the R-12, R-18 and R-22 implementing zones with R-24 and R-36 in Urban Medium Density Residential, raising the assumed yield of the same land in the County’s capacity model. The County has published no corridor-level capacity figure, and Table 94 of the Final Environmental Impact Statement, which reports projected additional parkland needs by jurisdiction, contains entries for Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland and Yacolt and no entry for unincorporated Clark County or the Vancouver Urban Growth Area. The narrative accompanying that table explains that as urban areas are annexed into cities the County’s role shifts toward regional and rural parks; this corridor is not annexed and is not proposed for annexation within the planning period.

The table below states what Kozy Kamp provides against the known growth and against the twenty-year total.

Table 4. Population relying on Kozy Kamp Neighborhood Park. Existing residents apportioned equally across the corridor’s three neighborhood park sites; new growth assigned entirely to Kozy Kamp, the only park in the area receiving it. Residents from Table 2.

Component	Residents	Acres per 1,000	Percent of standard	On 3.74 ac
Existing residents (one-third share)	4,285			
Approved and under construction	5,645			
Pre-application	1,296			
Subtotal, existing and known	11,226	0.44	9%	7%
Estimated additional growth to 2045	19,037			
Total	30,263	0.16	3%	2%

The apportionment is conservative. One of the corridor’s three neighborhood park sites has not been built, so the existing load on Kozy Kamp is greater than a one-third share and the table does not credit that, nor does it count the users the park draws from beyond its own service area. On the 4.98 inventoried acres Kozy Kamp provides 9 percent of the adopted standard against the existing and known population and 3 percent against the twenty-year total; on the 3.74 acres accessible after the fenced wetland, 7 percent and 2 percent.

Parkland needed against parkland held

The obligation follows directly from the standard. The existing and known population of 19,794 residents from Table 2, at two acres of neighborhood parkland per 1,000 residents, requires 39.6 acres of neighborhood parks; at three acres of community parkland per 1,000, it requires 59.4 acres of community parks; the combined obligation is 99.0 acres. Applying the same two rates to the twenty-year total of 38,832 residents yields 77.7 acres of neighborhood parks and 116.5 acres of community parks, a combined obligation of 194.2 acres. Against those figures the County holds 13.98 acres within the corridor, all of it on the neighborhood tier, of which 9.98 acres are developed.

Table 5. Parkland held by the County within the corridor.

Park	Tier	Acres	Status
Vista Meadows	Neighborhood	5.00	Developed 2006
Kozy Kamp	Neighborhood	4.98	Developed 2024; approximately 25 percent fenced wetland, leaving roughly 3.74 accessible acres; no parking, no restrooms
Mount Vista Property	Neighborhood	4.00	Owned, not built; the site at which the County intends to satisfy the outstanding Salmon Creek Community Club neighborhood park commitment; programmed at \$3,150,000 with construction dollars in 2029
Salmon Creek Community Club Property	Natural area	0.00	Owned; designated a neighborhood park in County materials as recently as 2015, later classified natural area; \$280,000 programmed for planning and design of natural area access, not budgeted for development
Community parkland	Community	0.00	None within the corridor
Total held		13.98	All neighborhood tier; 4.00 acres unbuilt

Measured against both of the County's adopted standards, and at both population levels, the corridor fails independently in every case.

Table 6. Parkland needed against parkland held. Populations from Table 2; acreage held from Table 5.

Tier and standard	Standard	Acres owed	Acres held	Acres developed	Deficit
<i>Existing and known population — 19,794 residents</i>					
Neighborhood parks	2 ac/1,000	39.6	13.98	9.98	25.6
Community parks	3 ac/1,000	59.4	0.00	0.00	59.4
Combined, acquisition	5 ac/1,000	99.0	13.98	9.98	85.0
Combined, development	4.25 ac/1,000	84.1	—	9.98	74.1
<i>Twenty-year total — 38,832 residents</i>					
Neighborhood parks	2 ac/1,000	77.7	13.98	9.98	63.7
Community parks	3 ac/1,000	116.5	0.00	0.00	116.5
Combined, acquisition	5 ac/1,000	194.2	13.98	9.98	180.2
Combined, development	4.25 ac/1,000	165.0	—	9.98	155.0

On acreage accessible after the Kozy Kamp wetland the development deficit is approximately 75.4 acres. These corridor-wide figures still understate the condition in the area of new development, because 9.00 of the 13.98 acres held sit south of the Mount Vista ridge, outside the network reach of the households the plan is adding.

The nearest community parks lie outside the corridor

Because the corridor contains no community parkland, the County’s community park obligation here can only be answered by facilities outside it. Two exist, in opposite directions, and neither serves the corridor within the terms the element sets.

Fairgrounds Community Park lies on the west side of Interstate 5 and is the closer of the two to the northern portion of the corridor, where the rate of development is highest. Reaching it from that development requires crossing the interstate. The park and recreation element directs that park sites be located so residents within the service area need not cross a major arterial; Interstate 5 is the most complete form of that barrier. No pedestrian route presently crosses it serving this area. The NE 179th Street interchange reconstruction, scheduled for completion in 2031, will provide a pedestrian route beneath the interstate. That crossing will not by itself produce a walkable route to the park, because the sidewalk network on the approaches to it and on the streets beyond remains incomplete, and nothing in the transportation or parks capital programs closes those gaps. For the duration of the planning period, access is by vehicle.

Pleasant Valley Community Park, forty acres, lies south of NE Salmon Creek Avenue and therefore outside the corridor entirely. Reaching it from the area of new development requires descending to NE 134th Street and travelling east on NE Salmon Creek Avenue as it curves northeast, a route that places the site beyond the three-mile network distance the element assigns to community parks and that lacks continuous pedestrian facilities.

According to the County's park page for the site, Pleasant Valley Community Park is partially developed, comprising asphalt and crushed rock trails, non-irrigated open grass areas, a gazebo and a pedestrian bridge, with access to Salmon Creek. The page gives the site's location on NE Salmon Creek Avenue, states that limited parking is available at the adjacent Pleasant Valley schools rather than at the park, and states that a preliminary master plan was developed in 2005 but has not been finalized or approved by the County Council and that staff will revisit it with residents once funding is available. The improvements that plan would add include a park center with playground, restroom, bicycle racks, benches and tables, twelve parking spaces, a new pedestrian entrance on NE 50th Avenue, and trail connections — that is, the support facilities the element requires of a community park. Observed from NE Salmon Creek Avenue, no park is visible from the road the County identifies as the site's location, and the road along the frontage is narrow and without sidewalks.

The Parks, Recreation and Open Space Plan measures park service by travel distance along the road network from known and accessible access points. A site whose access is at the adjacent schools rather than on the road given as its location, reached from the corridor only by vehicle, does not serve the corridor's residents under that methodology.

A community park reachable only by driving does not satisfy a standard the County defines by travel distance from the residences it serves, and neither park is programmed for improvement that would change that. The corridor's entire community park obligation — 59.4 acres against the known population, 116.5 acres against the twenty-year total — is unmet.

Other County holdings within the corridor

Two further County holdings lie within the corridor but do not bear on the neighborhood and community standard. Whipple Creek Hollow Natural Area, forty acres at NE 22nd Avenue and NE 164th Street, was purchased in part with Conservation Futures funds in 2006, is classified as natural area, and offers wood chip trails with no paved trails, no restrooms, no potable water, no trash facilities and no bicycle parking. The Salmon Creek Community Club property lies at the bottom of the Mount Vista grade on a bend in one of the few connecting routes between NE 29th and NE 20th Avenues; its position on the curve precludes parking and the grade cuts its pedestrian reach in both directions. The County classified it a natural area rather than a neighborhood park, and the capital improvement plan funds \$280,000 of planning and design for natural area access while stating that the project is not budgeted for development. The neighborhood park commitment attached to the site was not abandoned but relocated: the Greater Clark Parks District project scoreboard records the single remaining neighborhood park commitment as the Salmon Creek

Community Club neighborhood park to be built at the Mount Vista property, four acres, at an estimated \$2,820,000, which is the project the capital improvement plan now carries at \$3,150,000. The obligation therefore moved from the bottom of the grade to the top of the ridge, roughly two miles from the development it is counted as serving, and no substitute site was identified for the area the original property was to have served.

The Washington State University Vancouver campus

The 351-acre Washington State University Vancouver campus lies within the corridor and includes lawn areas and a formal trail system. That acreage does not reduce the deficit. The level of service is measured against the County's urban park inventory, which reports neighborhood parks, community parks, urban natural areas and joint school/park sites as four discrete categories, with joint school/park sites reported separately and not credited toward the neighborhood and community standard; the campus appears in none of them, and the Parks, Recreation and Open Space Plan's inventory of other public land providers, which enumerates the federal and state agencies operating in Clark County, does not include the university. Where the County has elected to credit other providers' lands it has done so expressly and only at the regional tier, adding 6,848 acres of other-provider regional-scale parkland to the regional calculation while making no equivalent adjustment anywhere in the neighborhood and community analysis. The school-grounds credit the element does allow is conditioned on an agreement governing public use, and the sites so credited were developed with County parks support and are already within the reported inventory; no campus acreage generates park impact fee credit or appears in the Parks and Lands Capital Improvement Plan. Finally, the open portions of the campus are planned development area: the 2018 Campus Master Plan, received into the County's 2019 annual review docket, designates sites in the southwestern portion of the campus for student residential development, and in 2019 the County amended its development code at the university's request because the code had not previously permitted residential use on university land.

The capital program

The draft 2027–2032 Parks and Lands Capital Improvement Plan, issued July 10, 2026, confirms the financing problem rather than resolving it. The plan states that its project list does not represent a development schedule that will keep up with the level-of-service standard set out in the current Parks, Recreation and Open Space Plan, explaining that the division must avoid adding to the workload of an overburdened operations team and must shift away from new park development toward maintenance at existing sites. It states that it continues to reflect a purposeful slowdown in new park development in recognition of an unfunded operations and maintenance structural deficit, and that each capital development project will be paired with an operations position request — that is, that each project remains contingent on a budget authorization not yet granted. The County reports elsewhere that in 2025 only 27 percent of total county parks funding could be used for maintenance and operations, and that its park system is funded at 22 percent of the level of peer agencies nationally. Appendix G to this comprehensive plan records a further constraint: most or all of the revenue from the existing Conservation Futures property tax levy is committed to

servicing bonds reissued in 2018 for the following twenty years, so that a significant source of funding for the parks program will not be available again until 2038.

The structure of parks funding leaves the corridor with a single source. The capital improvement plan identifies five funding programs. Park impact fees, collected within the district on residential building permits, may be used for park development or land acquisition and must be spent within the district that collected them and within ten years. Real estate excise tax is available for parks, but the plan states that Parks currently uses it only for major maintenance. The Greater Clark Parks District levy is used primarily for the operation and maintenance of parks within the district, and across the entire six-year plan it contributes \$290,000, all in 2027 and all for planning studies. Conservation Futures is restricted to natural area, farm and forest preservation. Grants are opportunistic. The General Fund contributes \$140,000 over six years. Neighborhood and community parkland in this corridor can therefore be acquired or built only with park impact fees from District 10, of which \$112,151 is programmed across the six-year period. The plan further provides that community parks within three miles of a district are eligible for that district's impact fees, which is how a community park on the far side of Interstate 5 comes to serve District 10 for funding purposes. The plan also states in one section that the district comprises seven impact fee districts and in another that it comprises ten.

The programmed acquisition is nominal. Across the entire six-year period the plan programs \$112,151 for park land acquisition in District 10, all of it in 2027, against a corridor deficit that begins at approximately 85 acres and rises with the growth the plan authorizes. It programs no park land acquisition in any district in 2029, 2030, 2031 or 2032. By comparison it programs \$941,162 for District 9 and \$813,839 for District 7. The total capital plan is approximately \$93,042,082 over six years, of which \$23,050,000 is new park development.

The single corridor facility programmed is Mount Vista Property Neighborhood Park, funded at \$3,150,000 across 2027, 2028 and 2029, entirely from park impact fees. Because the County already owns the four-acre site, its construction would not reduce the acquisition deficit at all. It sits at the top of the ridge, roughly two miles from the northern development and on the far side of the grade, and is subject to the same operations and maintenance contingency the plan applies to every development project.

The district's own six-year forecast shows the dedicated fund being drawn down to nothing. In its December 2, 2025 budget presentation the County modelled three scenarios against a 2026 beginning fund balance of \$7,773,058: with no levy increase the 2031 projected available ending balance is \$161,608; with a one percent increase it is \$454,174; and with a one percent increase plus recapture of banked capacity it is \$955,941. Under every scenario the County examined, including the maximum increase available to it, the fund is substantially exhausted within six years. That projection already incorporates the revenue that new construction in this corridor will generate, because new construction is added to the levy limit under RCW 84.55. Revenue from growth does not cover the cost of serving growth, on the County's own model.

The funding mechanism that built the existing system has been exhausted. The Greater Clark Parks District levy approved in 2005 carried the condition that thirty-five new parks would be built and maintained within the district. The capital improvement plan reports twenty-eight neighborhood parks and five community parks developed since the district's formation and describes Kozy Kamp and Curtin Creek Community Park as the final parks developed under the original Proposition 1 development proposal. Kozy Kamp was therefore delivered in 2024 as the last park the levy program will produce, into an area the plan now proposes to upzone.

The twenty-year needs analysis has been contracted out and is not yet performed

On July 21, 2026, three days before the Final Environmental Impact Statement for this update was issued, Public Works asked the County Council to authorize a professional services agreement with Design Workshop, Inc. in the amount of \$318,374 to develop a comprehensive park system plan. The staff report states that the current Parks, Recreation and Open Space Plan, adopted in 2022, remains valid through 2027; that the updated plan will establish goals and strategies to address the County's parks, recreation and open space needs over the next twenty years; that county staff do not currently have the capacity to complete the work internally; and that the resulting recommendations may shape the capital improvement program, identify gaps in service, and influence future land use decisions.

The contract scope confirms what the new plan is intended to produce. The services to be provided include park conditions and inventory assessment, geographic information system analysis, data analysis and needs assessment, growth and demand forecasting, a level of service methodology update, and a land acquisition strategy. Task 2.9 provides that the consultant will calculate level of service measurements by park type, amenity type and geographic service area, identify gaps, and work with the County to develop level of service goals. The scope identifies the resulting document as the 2028–2033 Clark County System Plan.

RCW 36.70A.070(3)(b) requires the capital facilities plan element to contain a forecast of the future needs for capital facilities, and subsection (3)(c) requires it to identify the proposed locations and capacities of expanded or new facilities. Park and recreation facilities are within that element by the express terms of the statute. For parks, the County is adopting a twenty-year land use plan supported by an analysis that expires in the second year of the planning period, while separately funding the twenty-year needs assessment, demand forecast, level of service recalculation and service-gap identification for delivery after adoption. The forecast of future need is not merely thin in this record. The County has scheduled and paid for it to be produced later.

Conclusion

The sequence established by the record is as follows. The County removed the urban holding overlay in 2019, approved 3,026 housing units in the corridor, developed one 4.98-acre neighborhood park with no parking and no restrooms on the far side of a failing arterial from much of the development it serves, closed out the levy program that produced it, and now proposes to

increase allowed residential density on the same ground. Its capital plan programs \$112,151 of acquisition for the district over six years and states that it will not keep pace with the adopted standard. The analysis that would identify what this corridor needs has been contracted to a consultant for delivery after this plan is adopted.

RCW 36.70A.070(3)(e) requires reassessment of the land use element where probable funding falls short of meeting existing needs. The County's own watershed analysis establishes the existing need, its capital improvement plan establishes that probable funding falls short, and the land use element directs additional growth to the corridor notwithstanding both. RCW 36.70A.070(3)(c) and (3)(d) require the capital facilities element to identify the locations and capacities of new facilities and to finance them from identified sources; for this corridor it does neither. RCW 36.70A.070(8) requires the park and recreation element to implement and be consistent with the capital facilities plan element; a standard the financing plan expressly declines to meet is not implemented. Land Use Policy 1.1.4 directs growth primarily to areas where existing public facilities have capacity to serve it, and Policy 1.2.2 requires each urban growth area to have the financial capability to provide needed infrastructure. The plan is internally inconsistent in directing dense residential growth to a corridor its own documents show cannot be served by the parkland the plan provides or finances.

Sources

- Level-of-service standards, watershed methodology, district performance figures, district acquisition targets and other-provider crediting: Clark County Parks, Recreation and Open Space Plan 2022–2027, Figures 11, 19 and 27 through 32, and the Demand and Needs chapter.
- Park classifications, siting criteria and the revised acreage standard: draft park and recreation element, Chapter 7.
- Alternative level-of-service figures, housing capacity against target and projected parkland needs: 2026 Comprehensive Plan Update Final Environmental Impact Statement, Tables 68, 87, 88 and 94.
- Park acreage, facilities and development status: Clark County Public Works park pages for Kozy Kamp and Vista Meadows Neighborhood Parks, Pleasant Valley Community Park, the Mount Vista and Salmon Creek Community Club properties, and the Whipple Creek Hollow Natural Area site guide.
- Programmed acquisition and development, the operations and maintenance structural deficit and the development slowdown: Clark County Parks and Lands draft Capital Improvement Plan 2027–2032 (July 10, 2026), Tables 1.01 and 1.03, Tables 2.01 through 2.06, and Appendix A.

- Greater Clark Parks District commitments, remaining projects and fund forecast: Greater Clark Parks District Scoreboard, November 12, 2024, adopted with Resolution 2024-12-05; Greater Clark Parks District 2026 Annual Budget Adoption presentation, December 2, 2025.
- Parks funding shares and peer comparison: Clark County park use fee update materials, 2026. Conservation Futures levy commitment: Appendix G, Capital Facilities Financial Plan.
- Deferred needs analysis: Clark County staff report PW26-182, July 21, 2026, requesting authorization of Professional Services Agreement SCN00004476 with Design Workshop, Inc. (project PRJ0004487), and Exhibit A, Scope of Services, including Task 2.9.
- Codified park definitions: Clark County Code 40.100, definitions of neighborhood park and community park.
- Missing sidewalk inventory and the road modification finding: draft Transportation Element, Chapter 5, Table 5.01 and accompanying text.
- Accessible pedestrian access route criteria and barrier categories: draft Clark County Public Works Transportation Americans with Disabilities Act Transition Plan.
- Capacity allocation and model parameters: Draft Environmental Impact Statement, Section 1.0, Table 1, as quoted by the Cities of Ridgefield and La Center and confirmed in the County's responses; density targets by zone, Appendix K.
- Campus acreage and planned development: Washington State University Vancouver 2018 Campus Master Plan, received into the County's 2019 annual review docket.
- Household size and vacancy factors: 2025 Comprehensive Plan Final Environmental Impact Statement.
- Elevation profile: U.S. Geological Survey 3D Elevation Program, 1/3 arc-second bare-earth digital elevation model, sampled along the NE 29th Avenue centreline.
- Existing population and housing: Washington Office of Financial Management, Small Area Estimates Program, 2020 census block estimates, summed across the blocks within the corridor boundaries.