From:	Jeffrey Delapena
To:	Michelle Pfenning; Heidi Pozzo; Sue Marshall
Cc:	Rebecca Messinger; Oliver Orjiako; Jose Alvarez
Subject:	RE: Comment for the record — Arterial Atlas, Aug. 20 hearing on the Comprehensive Plan Update
Date:	Monday, August 17, 2026 3:15:00 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png image008.png

Good day, Heidi,

Confirming receipt with Community Planning. This comment will be added to the Comprehensive 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.

From: Michelle Pfenning <Michelle.Pfenning@clark.wa.gov>
Sent: Monday, August 17, 2026 7:53 AM
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>; 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: RE: Comment for the record — Arterial Atlas, Aug. 20 hearing on the Comprehensive Plan

Update

Thank you Heidi for your public comment, this will be entered into the record.

Thank you,

Michelle Pfenning

Michelle Pfenning
Council Administrative Assistant
Direct Phone: 564.397.5109
County Mobile: 360-904-0688
Michelle.Pfenning@clark.wa.gov

"Just when the caterpillqar thought her life was over, she became a Butterfly".-Barbara Haines Howett

---

From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Sunday, August 16, 2026 11:41 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: 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: Comment for the record — Arterial Atlas, Aug. 20 hearing on the Comprehensive Plan Update

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 and Planning Commission,

Please enter the attached comment into the record for the August 20 hearing on the 2025–2045 Comprehensive

Plan Update and forward to the Planning Commission.

The comment asks one thing: that the Arterial Atlas not be adopted with this plan.

The Arterial Atlas is the county's drawing of what every arterial and collector road is supposed to look like, and county code assigns each of those drawings a traffic capacity. It has not been updated to include the bike lanes and sidewalks this plan requires on 106 miles of county roads, and the county has said in three places that it will be updated after the plan is adopted. The RTC model that produced every congestion number in this package was run on the road network as the Atlas shows it today.

That matters because the space for these additions has to come from somewhere. On roads that are already built, it comes either from buying land or from the existing pavement. Appendix A's 106.4-mile figure expressly excludes every roadway already identified for improvement in the capital facilities plan — so none of those miles carries a widening project, and no right of way is being purchased along them. The plan also deletes the county's long-standing policy that bicycle and pedestrian projects be built "without the loss of streets and/or highway vehicular lane capacity," and the county's own policy summary explains that the policy was removed because it conflicts with the new multimodal standard. Nowhere in the package does the county show which roads lose travel lanes, or what that does to traffic.

The comment asks for three things before the Atlas is recommended for adoption: show the road drawings for the facilities the plan requires; show which roads lose travel lanes; and show what that does to the capacity of those corridors. With those three answers, the Commission and the Council can weigh the growth this plan assigns against the roads that have to carry it, and decide whether to fund the difference or direct that growth to areas where the infrastructure is already adequate. Without them, that balance cannot be struck.

This is not a comment on the merits or the safety of bicycle infrastructure. It is about road capacity.

Thank you for your consideration.

Heidi

COMMENT ON THE 2025–2045 COMPREHENSIVE PLAN UPDATE

The Plan Adds Traffic and Narrows Roads, and Shows Neither

The Arterial Atlas and the 2025–2045 Comprehensive Plan Update

To: Clark County Council and Clark County Planning Commission
From: Heidi Pozzo
Date: August 16, 2026

The Arterial Atlas should not be adopted with this plan. It has not been updated to show the road system the plan requires, and the county has said it will be updated after adoption. Everything below explains why that sequence cannot work here.

The 2025–2045 Comprehensive Plan Update does three things at once, and the third is not visible anywhere in the documents before you.

- It plans for a lot more driving. The county's own forecast is 52 to 53 percent more weekday trips by 2045.
- It plans very little new road. Over twenty years the county's project list adds about nine miles of new travel lanes across the whole unincorporated county — four of those miles on a single project.
- It requires bike lanes and sidewalks on 106 miles of county roads that do not have them today. On a road that is already built, the space for a bike lane has to come from somewhere: either buying land along the road, which is expensive and slow, or the existing pavement — the traffic lanes.

Nowhere in this package does the county show which roads lose traffic lanes, or what happens to traffic when they do.

This memorandum does not comment on the merits or the safety of bicycle infrastructure. It is about road capacity. These roads are already inadequate for the traffic they carry, this plan adds substantially more traffic to them, and the additions the plan requires will take space from the traffic lanes.

The document that would show this is the Arterial Atlas. The Atlas is the county's drawing of what every arterial and collector road is supposed to look like — how many lanes, how wide, what goes beside them — and county code assigns each of those drawings a traffic capacity. The Atlas has not been updated to include any of the new bicycle facilities, and the county has said it will be updated after this plan is adopted. The RTC model that produced every number in this package was run on the road network as the Atlas shows it today.

So the analysis in front of you describes a road system the county has already said it is going to change, and the change goes in one direction: less room for cars.

1. More traffic, almost no new road

The Final Environmental Impact Statement forecasts a 52 to 53 percent increase in weekday daily person trips between 2025 and 2045, against a 1.3 percent increase in highway lane miles regionwide and roughly a 26 percent increase in transit service hours.

On the county's own system, the twenty-year project list in Appendix A contains 23 corridor projects, 19.35 centerline miles, and $418.3 million. Sorting them by what they actually build:

What the project builds	Projects	Miles
Five lanes — four travel lanes plus a center turn lane	7	8.5
Four-lane rural arterial	1	0.7
One additional travel lane	1	0.1
Three lanes — two travel lanes plus a center turn lane	11	7.8
Two-lane standard	2	1.8
Signal timing only	1	0.4

Source: Appendix A, Transportation Capital Facilities Plan, Table 4, pages 17–19. A three-lane section adds a center turn lane, not through capacity. Appendix A does not state a lane count for the three NE 179th Street segments, which are described only as improvements "to a standard arterial"; they are shown here as five-lane sections consistent with the corridor's Pr-4cb designation in the Arterial Atlas and the design now in construction.

About nine of the nineteen miles add travel-lane capacity, and four of those nine are a single project on NE 72nd Avenue. Everything else adds a center turn lane, brings a road up to a two-lane standard, or retimes a signal. Some additional roadway will be built by developers as frontage improvements, but county code caps that obligation at forty-four feet of width, or twenty-two feet where only one side of the road is being developed, so it produces partial-width segments rather than continuous capacity.

2. The plan requires bike facilities on 106 miles of road, and the space has to come from somewhere

Appendix A identifies 150 county road segments — 106.4 miles — that do not meet the new active transportation standard this plan adopts, and lists what each one needs: 52.5 miles of protected bike lane, 27.5 miles of buffered bike lane, and 20.9 miles of shared-use path. It also flags 34 segments, 23.9 miles, for lower speed limits.

A protected or buffered bike lane sits between the curb and the travel lane and takes seven to twelve feet on each side of the road. These are roads that have nothing today — countywide, the plan reports 258 miles of county road with no bicycle or pedestrian facility where facilities are planned, and 424 miles of missing sidewalk in the urban growth area. Adding a facility on that scale means widening the roadway, buying right of way, or narrowing what is already there.

The plan does not say which. But it does remove the policy that used to rule out the third option, and it says why. The county's policy summary for Council sets the existing policy beside the proposed one.

> *Supports efforts to fund construction of bicycle and pedestrian improvements in the Clark County Bicycle and Pedestrian Master Plan without the loss of streets and/or highway vehicular lane capacity.*
>
> — Existing Policy 5.2.9, Comprehensive Plan 2015–2035 as adopted

In the draft before you, that policy is renumbered 5.3.12 and the closing clause — without the loss of streets and/or highway vehicular lane capacity — is deleted. The county's stated reason is set out in the same summary:

> *As is currently written, this policy would conflict with new multimodal level of service standard requirements and the amended language to RCW 36.70A.070(6)(a)(iii)(E) as a result of HB1181.*
>
> — Policy summary for Council, Chapter 5, page 9 of 17

That is the county's own explanation, and it is the clearest statement in the record of what this plan requires: a policy protecting vehicle lane capacity conflicts with the new standard, so the protection is being removed. Two new policies are added in its place. Policy 5.3.14 gives priority to the facility with the greatest multimodal safety benefit "when it is unattainable to meet all established multimodal level of service standards on a roadway." Policy 5.3.15 directs the county to consider bicycle facilities on parallel routes "where it is infeasible to achieve the desired level of service standard on a roadway." Both contemplate roads where the standard cannot be met.

HB 1181 is cited as the reason. That bill also requires this plan to reduce per capita vehicle miles traveled. A reduction depends on trips having somewhere else to go. In the NE 179th Street corridor, where the county is directing a substantial share of its new housing, there is no fixed-route transit and none planned, no employment nearby, and no daily-needs commercial nearby. A bike lane does not remove a commute trip.

In that corridor the county is rebuilding NE 179th Street from a two-lane rural road to a five-lane section, and the space for the paths comes from new right of way rather than from the travel lanes. The corridor gains road. What it does not gain is anywhere the new residents can go without driving — so the additional density arrives as additional car trips on a corridor the plan is widening by about two miles out of the nine it adds countywide.

Appendix A makes clear where the lane loss falls. The 106.4-mile figure expressly excludes every roadway already identified for improvement in the capital facilities plan. So none of those 106.4 miles carries a widening project, no right of way is being purchased along them, and the seven to twelve feet a protected or buffered bike lane needs on each side has to come out of the road that is there. That is where the deleted policy does its work, and it is the part of the system the plan shows nothing about.

The Arterial Atlas would ordinarily settle this. It contains nine standard road drawings, one assigned to every arterial and collector in the county, and county code assigns each of those drawings a traffic capacity. Not one of the nine shows a protected bike lane, a buffered bike lane, or a shared-use path. The most any of them provides is a six-foot painted stripe. So for 100.9 of the 106.4 miles this plan says need fixing, there is no adopted drawing showing what the fixed road looks like or how many traffic lanes it has.

3. The county has said the Atlas will be updated after the plan is adopted

This is stated three times in the record.

> *The county anticipates updating the standard detail cross-sections and classification system after adoption of the 2025-2045 Comprehensive Plan…*
>
> — Comprehensive Plan, Chapter 5, page 24, lines 12–15

The county's transportation consultant listed among the anticipated outcomes of adopting the new standard: updated urban roadway design standards incorporating the minimum dimensions for the new bicycle facilities, and cross-section standards to be developed to address the additional right of way they need.

And staff told this Commission on April 16, 2026 that the proposed Active Transportation Network would "inform subsequent updates of the Arterial Atlas and county's road and street standards." The sequence chart in the same presentation places the Arterial Atlas last, after the land use alternative, the travel model, the needs analysis, the capital facilities plan, the financial plan, regional certification and the impact fee program.

4. The RTC model was run on the road system as it is today

> *The assumed transportation network included the existing network plus improvements identified in the Regional Transportation Plan (RTP).*
>
> — Comprehensive Plan, Chapter 5, page 50, lines 13–14

The Regional Transportation Plan project list does not contain this plan's active transportation program. That program is new with this plan. So none of the 100.9 miles of new bike facilities, none of the 34 speed reductions, and none of the lane changes that building them would require were in the road network the RTC model was run on.

The words "protected bike lane" and "buffered bike lane" do not appear anywhere in the Final Environmental Impact Statement. Its traffic analysis counts vehicle miles, vehicle hours, delay, and congested lane-miles. Its discussion of walking and biking is descriptive and produces no numbers at all.

The result is that the congestion findings in this package — including the finding that only five county road segments, 1.23 miles, will be over capacity in 2045 — were calculated on roads that still have all their lanes.

5. What this means for the decision in front of you

Appendix A states the choice the Growth Management Act requires the county to make.

> *The goals of the Transportation Concurrency Program and the Growth Management Act require a balance between land development and the transportation facilities serving that development. The variables in this balance include the growth rate, transportation investments and level-of-service standards.*
>
> — Appendix A, Transportation Capital Facilities Plan, page 8

If a corridor cannot carry the growth assigned to it, the county has real options. It can find the money to widen the road. It can direct that growth to parts of the county where the roads, schools and utilities are already adequate. Those are ordinary planning decisions, and they are the decisions this Commission and the Council exist to make.

None of them can be made on this record, because the record does not show which corridors fall short. The congestion analysis was run on a road system with more lanes than the plan intends to leave in place, and the document that would show the difference is the one the county has said it will rewrite after you have voted.

What I am asking

The Commission is being asked on August 20 to act on the entire plan — every chapter, every appendix, the mapping changes including the Arterial Atlas, and the environmental documents — in one proceeding. Chapter 5 and the proposed Arterial Atlas changes were before this Commission at one work session, on July 16. Four documents in the hearing packet, including Appendix A, were revised on August 14. The document posted as the Arterial Atlas for that work session is a single county-wide index sheet; at that scale no individual road designation is legible, and the appendix containing the standard road cross-sections — the pages this memorandum concerns — is not included. The Atlas is being transmitted ahead of the corrections the county has said it will make.

Before the Arterial Atlas is recommended for adoption, I would respectfully ask for three things.

1. Show the road drawings. The Atlas and the county road standards should include a standard cross-section for a protected bike lane, a buffered bike lane and a shared-use path — the three facilities this plan requires on 100.9 of its 106.4 deficient miles — so the public can see how wide each road becomes and how many travel lanes it keeps.
2. Show which roads lose travel lanes. For the corridors where the new bicycle facility is to be built inside the existing roadway, identify the segment, the number of travel lanes before and after, and the resulting road classification.
3. Show what that does to traffic. State the capacity of those corridors under the road system the plan intends, identify which of them cannot carry the growth this plan assigns them, and say whether the county proposes to fund the widening or to direct that growth to areas where the infrastructure is already adequate.

Together these three things would let the Commission and the Council do what the Growth Management Act asks: weigh the growth this plan assigns against the roads that have to carry it, and decide whether to fund the difference or direct that growth to areas where the infrastructure is already adequate. That balance cannot be struck against a road system the county has said it will redraw after the vote.

Sources

Document	Relied on for
DRAFT 2026 Arterial Atlas, Appendix A	The nine standard road cross-sections and the bicycle facility each provides, pages 70–78
Comprehensive Plan, Chapter 5, Planning Commission draft	Page 13 — existing bicycle facility inventory; page 15, Table 5.01 — missing sidewalk; page 24, lines 12–15; page 50, lines 13–14; page 75 — Policies 5.3.12, 5.3.14 and 5.3.15
Appendix A: Transportation Capital Facilities Plan	Page 2 — needs analysis; Table 2 — bicycle facility needs; Table 3 — deficient segments; Table 4 — twenty-year project list; Table 6 — active transportation projects and speed reductions; page 8 — balance
Policy summary for Council, all chapters	Chapter 5, page 9 of 17 — existing Policy 5.2.9, proposed Policy 5.3.12, and the stated rationale for the amendment
Technical Memorandum #1, DKS Associates, August 13, 2025	Page 20 — anticipated outcomes of adopting the new standard
Planning Commission work session presentation, April 16, 2026	Sequence of work products; the Active Transportation Network to inform subsequent updates of the Arterial Atlas
Final EIS, Volume 1, July 24, 2026	Section 3.9 — travel forecasts, network assumptions, performance measures, active transportation discussion
Clark County Code 40.350.020 and 40.350.030	Road capacity by classification; standard cross-section specifications