From:	Cnty 2025 Comp Plan
To:	Walter Valenta; Cnty 2025 Comp Plan
Cc:	Oliver Orjiako; Jose Alvarez; Rebecca Messinger
Subject:	RE: Comp Plen Recommendation #20 - Comment #1 of 4
Date:	Friday, September 25, 2026 1:37:59 PM
Attachments:	Comp Plan Comment #1-Existing Land Use.pdf Comp Plan Comment #2-How Many Units.pdf Comp Plan Comment #3-WSDOT Restrictions.pdf Comp Plan Comment #4-Why Did the Planning Commision Deny #20.pdf image001.png image002.png image003.png image004.png

---

Good day, Walter,

Thank you very much for submitting comments related to the 2025 Comprehensive Plan update.

These will be added to the Comprehensive Plan Index of Record. I am forwarding all four comment letters to Rebecca Messinger from the Council's Office for awareness and to share with the Council.

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: Walter Valenta <waltervalenta@gmail.com>
Sent: Friday, September 25, 2026 1:24 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: Comp Plen Recommendation #20 - Comment #1 of 4

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.

Clark County Councilors: Chair Sue Marshall, Glen Yung, Michelle Belkot, Will Fuentes, and Matt Little,

Please accept this Comment #1 on the Comp Plan Update regarding Staff Recommendation #20

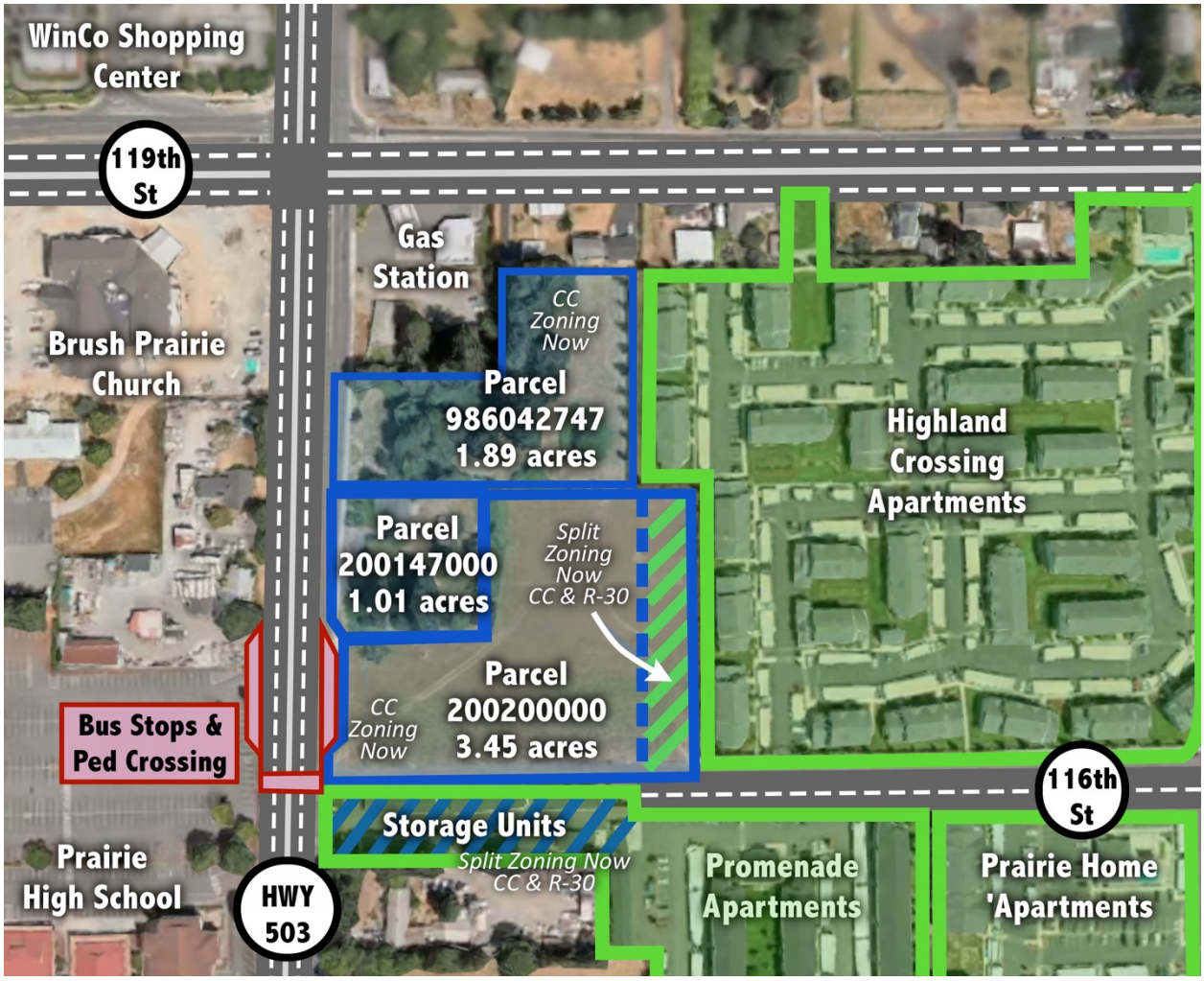
Parcels 986042747, 200147000, 200200000

Thank you,

Walter Valenta
waltervalenta@gmail.com
503-880-0181

Planning Staff - Map Recommendation #20

Comment #1 - Existing Land Use



These 3 parcels, outlined in blue, are currently zoned Community Commercial (CC). These 3 parcels have not been developed since the last Clark County Comp Plan Update 10 years ago.

There is not a market demand for Community Commercial uses. Particularly here because WSDOT is restricting access from HWY 503. (See Comment #3 for WSDOT Access Restrictions).

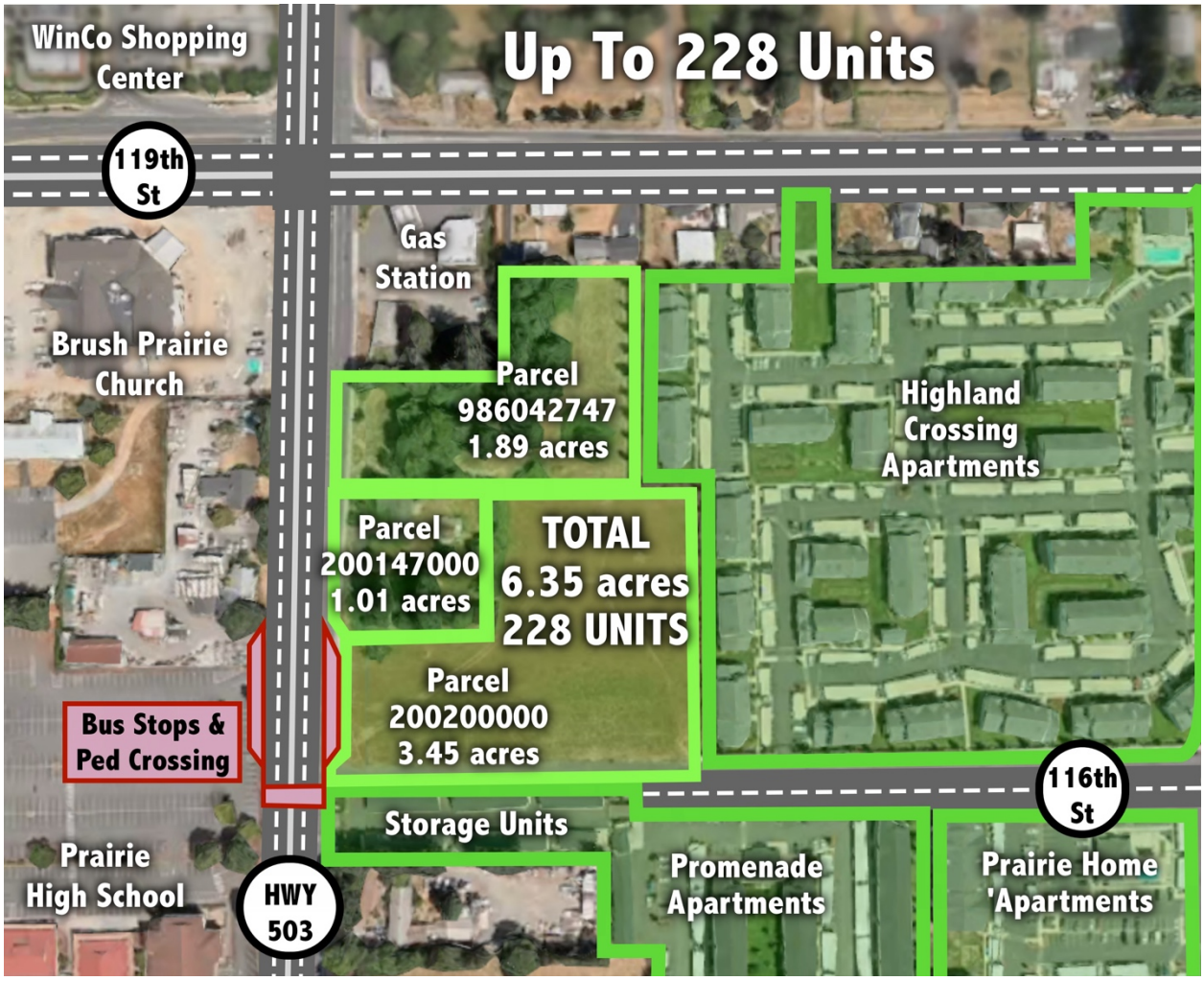
Housing is not allowed in Community Commercial. One land use that is allowed in Community Commercial is Self Storage Units. Storage Units were built on the parcel south of these 3 parcels, however the Storage Units are accessed only through the Promenade Apartments, because again, WSDOT has restricted access from HWY 503. Now Self Storage uses are discouraged or out-right banned in certain areas of Clark County.

The County goals now are for more housing. This is a great site for Multi-Family housing because access can be provided from the internal road system from 116th St. Housing doesn't need a direct connection to HWY 503. Multi-Family Housing is also a great land use that would support the adjacent transit station and newly built Pedestrian HAWK.

Thank You,
Comment #1 by Walter Valenta

Planning Staff - Map Recommendation #20

Comment #2 - How Many New Residential Units?



These 3 properties each made a site specific request to be Zoned Multi-Family Residential.

Parcel 986042747	1.89 acres	Owned by Highland Crossing LLC (Ott Gaither)
Parcel 200147000	1.01 acres	Owned by Mjtrh Properties LLC (Mark Hough)
Parcel 200200000	3.45 acres	Owned by Alaska Mutual Investments LLC (Doug Kolberg)
Total 3 Parcels	6.35 acres	

Planning Staff Recommended R-36 Zoning for these 3 properties.

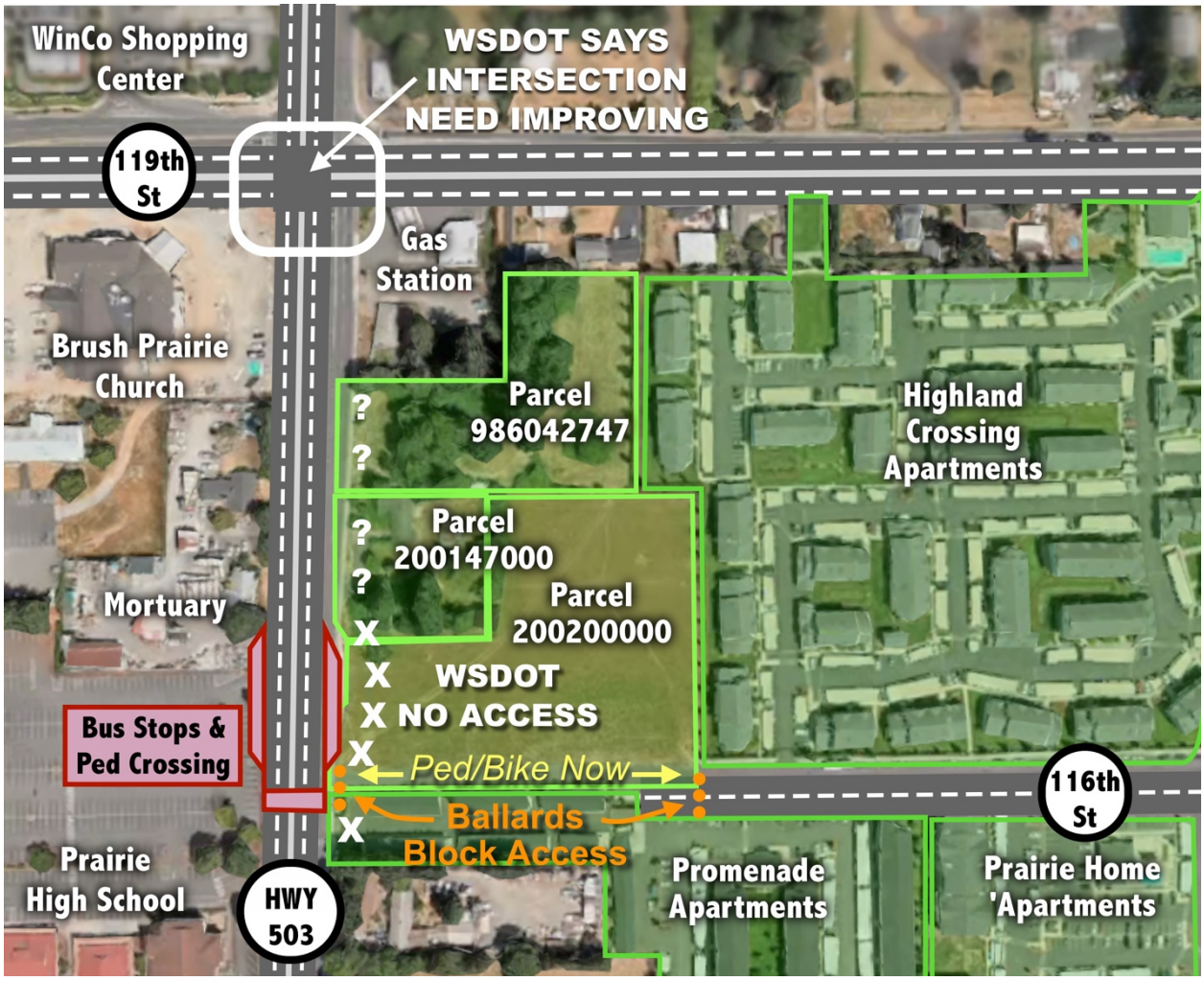
R-36 Zoning allows up to 36 units per acre. Total of 6.35 acres would allow up to 228 units.
A development of 228 units on this land could create a quality development that would support amenities like a Clubhouse, Swimming Pool, Workout Facility and/or Child Play Area.

A Multi-Family development located here would support several County Planning Goals: Next to a transit station. Across the street from Prairie High School served by a signalized pedestrian crossing. Walkable to a shopping area with a grocery store, bank and dentist. And Walkable to a Church.

Thank You,
Comment #2 by Walter Valenta

Planning Staff - Map Recommendation #20

Comment #3 - WSDOT Access Restrictions



In 2014 Washington Department of Transportation (WSDOT) improved HWY 503 in this area. WSDOT added a concrete center median. WSDOT added access restriction for properties along HWY 503.

WSDOT limited access to the Promenade Apartments from HWY 503 to only emergency vehicles. Parcel 200200000 has letters from WSDOT stating that 116th Street could not connect to HWY 503. (See WSDOT letter dated 5/17/23 paragraph 2 attached)

WSDOT built the pedestrian hybrid signal (HAWK crossing) and refuge island on HWY 503 just south the properties in February 2025.

WSDOT made comments to Clark County Comp Plan stating that the intersection at 119th and HWY 503 needs improvements. (See attached WSDOT letter dated Sept 15, 2026 - Items #3 and #15)

There is no assurance that WSDOT would grant access to HWY 503, or allow a right-in right-out access, even if the property owners would dedicate the right-of-way to create a deceleration and acceleration lane and pay for the expensive construction.

The access into these properties needs to be provided from 116th Street. That access which would wind through the existing residential neighborhood, would work for housing, but would not work for commercial purposes and access.

Please support Residential Zoning R-36 for these properties because of the WSDOT HWY 503 access restrictions.

Thank You,
Comment #3 by Walter Valenta

Washington State Department of Transportation

Southwest Region
11018 Northeast 51st Circle
Vancouver, WA 98682-6686
360-905-2000 / FAX: 360-905-2222
TTY: 1-800-833-6388
www.wsdot.wa.gov

May 17, 2023

Bryan Mattson, Planner III
Clark County Community Development Dept.
1300 Franklin St
Vancouver, WA 98660

RE: Pre-Application Conference – 116th Street Property (File No. PAC-2023-00126)
SR 503 MP 2.64

Dear Mr. Mattson:

Washington State Department of Transportation (WSDOT) staff have reviewed the pre-application materials submitted for the 116th Street Property pre-application conference (County File No. PAC-2023-00126). Approval of subsequent permit applications will result in the construction of 21 multi-family residential units and an 82-unit hotel over two phases. WSDOT staff would like to address our concerns and offer the following comments for your consideration.

SR 503 (NE 117th Ave) is classified as a Class 3 Managed Access Highway along the site's frontage. Chapter 468-51-030 WAC states that "every owner of property which abuts a state highway where limited access rights have not been acquired has a right to reasonable access, but may not have the right to a particular means of access, to the state highway system. The right of access to the state highway may be restricted if, pursuant to local regulation, reasonable access to the state highway can be provided by way of another public road which abuts the property." As the property has reasonable access to SR 503 via 116th Street and other public roads, WSDOT will not permit direct access to SR 503 from this development except for the existing emergency access.

An existing permitted emergency access to SR 503 is located on-site at the end of 116th Street. The bollards at this access shall remain locked and in place except when in use by emergency personnel. To further preclude the illicit use of this access, WSDOT requests that the applicant be required to replace the existing curb cut and approach with concrete sidewalk and mountable curb in accordance with WSDOT standard plans and specifications. Refer to Standard Plan F-10.12-04 for the specifications of the mountable cement concrete traffic curb and Standard Plan F-30.10-04 for cement concrete sidewalk specifications.

All work within WSDOT right of way is subject to review of plans, permitting, approval and construction inspection by WSDOT staff. WSDOT is required to be reimbursed by agreement for our costs associated with this project. This reimbursable agreement must be in place prior to WSDOT reviewing any plans submitted for approval. To help reduce any delays, it is recommended that the applicant contact WSDOT SW Region Engineering Services staff immediately after obtaining land use approval to begin the design review process.

WSDOT will require the following for all work within WSDOT right of way:

- Proposed changes to State facilities must be designed to current WSDOT standards and specifications.
- Plans must be reviewed and accepted by WSDOT prior to beginning work.
- Engineering calculations, plans and reports submitted for review and approval must bear the seal and original signature of a professional engineer licensed in the State of Washington.
- Copies of all environmental documentation required of this project by any local, State, or Federal jurisdiction. Failure to provide this documentation may result in a substantial delay of approval by WSDOT.
- Construction must be done in accordance with the current WSDOT Standard Specifications for Road, Bridge, and Municipal Construction manual.
- Construction inspection will be performed by WSDOT at the developer's expense.

In order to evaluate the impacts of this development proposal to the state transportation system, WSDOT requests that the developer provide a traffic impact study which includes all state route corridors and intersections impacted by 10 or more peak hour trips. This traffic study should address the impacts to the State highway system and suggest mitigation measures to maintain the current level of service and meet WSDOT safety requirements. WSDOT reserves the right to require additional mitigation from this development based on the results or recommendations in the traffic impact study.

WSDOT's drainage policy states that there will be no net gain in the storm water runoff transported to the WSDOT right of way from adjacent property. Proposed changes to storm water runoff will require the proponent to contact WSDOT directly, or through the permitting agency, to obtain WSDOT approval. Hydraulic calculations and plans must be submitted for WSDOT review and approval. The drainage plans and calculations will need to meet the requirements set forth in the WSDOT Hydraulics Manual (Engineer Publication M23-03) and the Highway Runoff Manual (Engineer Publication M31-16).

Due to the proximity of this proposal to SR 503, WSDOT will require that lighting installed by the applicant must be of an appropriate wattage and be shielded and/or directed according to RCW 47.36.180 to avoid any glare to the motorists on the highway.

These comments are based on a preliminary review of your project. As this project progresses, there may be need for additional information by this department for further review. *This review does not constitute final approval by WSDOT.*

Thank you for the opportunity to comment on this development proposal. If you have any questions or need additional information, please contact me at 360-831-5829 or at BassD@wsdot.wa.gov.

Sincerely,

Dylan Bass
Development Review Planner

From:	Cnty 2025 Comp Plan
To:	jason.lugo@wsdot.wa.gov
Cc:	Cnty 2025 Comp Plan; Harrison Husting; Oliver Orjiako; Jose Alvarez; Rebecca Messinger
Subject:	FW: WSDOT Comments: Clark County Draft Transportation Capital Facilities Plan
Date:	Tuesday, September 15, 2026 9:19:14 AM
Attachments:	image002.png Clark County WSDOT commentsTransportation CFP.xlsx image003.png image004.png image005.png image006.png

Good day, Jason,

Thank you very much for submitting WSDOT's comments related to the 2025 Comprehensive Plan update.

These will be added to the Comprehensive Plan Index of Record. I am including Rebecca Messinger from the Council's Office as well for awareness.

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: Lugo, Jason <jason.lugo@wsdot.wa.gov>
Sent: Tuesday, September 15, 2026 9:07 AM
To: Harrison Husting <Harrison.Husting@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Lebowsky, Laurie <laurie.lebowsky@wsdot.wa.gov>; Albrecht, Gary <gary.albrecht@wsdot.wa.gov>; Bass, Dylan <dylan.bass@wsdot.wa.gov>; Whitfield, Jacob <jacob.whitfield@wsdot.wa.gov>; Schilperoort, LisaRene <lisarene.schilperoort@wsdot.wa.gov>; Gibbens, Jason <jason.gibbens@wsdot.wa.gov>; Southwick, Michael

<michael.southwick@wsdot.wa.gov>; Hajda, Courtney <courtney.hajda@wsdot.wa.gov>
Subject: WSDOT Comments: Clark County Draft Transportation Capital Facilities Plan

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.

RE: WSDOT Comments, Clark County Draft Transportation Capital Facilities Plan
September 15, 2026

WSDOT values Clark County as a partner and appreciates our collaboration to develop and support a safe and efficient multimodal transportation network.

Attached to this document is a form which contains a table with specific comments for your review.

Thank you for the opportunity to review the draft Clark County Transportation Capital Facilities Plan.
Please accept this email for the record.

Jason Lugo | Development Review Planner, SWR
11018 NE 51st Cir
Vancouver, WA 98682-6686
360-905-2084 | Jason.Lugo@wsdot.wa.gov





COMMENT FORM

Document title:	***Appendix A: Transportation Capital Facilities Plan and Chapter 5 Transportation Element of***
Reviewer(s):	WSDOT SWR Staff-Planning and Traffic

No.	Section	Page	Table	Department/Division	Comment
1	Table 9 - WSDOT Projects - Road Segments	31	9	Planning	Planning estimate for SR 500 Complete Street improvements was between $17-19 million for full build (roundabouts plus SUP on both sides). Not sure if County wants/needs cost estimate as it is not being included in financial analysis.
2	Table 9 - WSDOT Projects - Road Segments	31	9	Planning	For all roadway segments with improvements needed to address peak-hour capacity deficiencies - have full-day operations been looked at? What are the improvements proposed?
3	Table 10 WSDOT Projects - Intersections	32	10	Planning	Why is SR 503/119th not included in this list? SR 503 Corridor Plan calls out operations at this intersection reaching failure in PM peak-hour in the horizon year.
4	Table 10 WSDOT Projects - Intersections	32	10	Planning	RE; SR 503 at NE 144th, why this intersection? Is the County also proposing to construct the arterial to the west per the Arterial Atlas?
5	Table 10 WSDOT Projects - Intersections	32	10	Planning	RE: SR 503 at NE 131st, why this intersection? Did the County mean the proposed arterial to the north?
6	Table 9 - WSDOT Projects - Road Segments	31	9	Traffic	Line item for Salmon Creek Interchange Project Phase 2. Does this item include the relocation of the I-205 SB off-ramp from 134th St to 139th St? Issues on 134th St are related to intersection spacing. What about connection to I-205 SB on-ramp? Severe lane imbalance at 20th Ave signal due to lane assignment.

No.	Section	Page	Table	Department/Division	Comment
7	Table 9 - WSDOT Projects - Road Segments	31	9	Traffic	Line item for NE 88th St. Prject description lists signal upgrades. What signal upgrades? This intersection is huge and several lanes in every direction. More detail needed. Also, this does not appear to be a WSDOT project.
8	Table 9 - WSDOT Projects - Road Segments	31	9	Traffic	Line item for NE Ward Rd. Not sure what is meant by "phased signals". Ward Rd SB already has two lanes. Additionally, there is already a signal here. A new one should not be added for the sake of maintenance and operations lifecycle costs put onto WSDOT.
9	Table 9 - WSDOT Projects - Road Segments	32	9	Traffic	Table 9, 1st row on page 9 is for SR 500 (EB & WB). For clarity, include "NE Fourth Plain Blvd" to better identify project location because NE 65th St crosses SR 500 in multiple locations.
10	Table 9 - WSDOT Projects - Road Segments	32	9	Traffic	Row 3 on this page is for SR 503 (NB). The boundries include "just north of intersection". WHat intersection?
11	Table 9 - WSDOT Projects - Road Segments	32	9	Traffic	Line item for SR 502 (WB), it mentions I-5 SB on-ramp with capacity deficiencies. How was this identified? This roadway segment has two lanes.
12	Table 9 - WSDOT Projects - Road Segments	32	9	Traffic	Last row in Table 9 on page 32 shows roadway segment from N of NE Padden Pkwy to N of NE Padden Pkwy. This is not a roadway segement. It describes a point.
13	Table 9 - WSDOT Projects - Road Segments	32	9	Traffic	What are the deficiencies for these rows? I am not aware. SR 500 (EB&WB) NE 65th St to NE 182nd Ave Improvements needed to address peak hour capacity deficiencies, SR 502 (WB) NE 10th Ave to NB I-5 off ramp Improvements needed to address peak hour capacity deficiencies SR 503 (NB) NE Roper Rd to NE Potter Rd Improvements needed to address peak hour capacity deficiencies
14	Table 10 WSDOT Projects - Intersections	32	10	Traffic	SR 503 & NE 131st St. This one is on WSDOT's radar due to public complaints forwarded by Clark County. This has been identified on previous studies and Clark County's arterial atlas.

No.	Section	Page	Table	Department/Division	Comment
15	n/a	n/a	n/a	Traffic	Not listed in this document are intersections with background and previous conversation with County staff. First is SR 503 & NE 119th St. The westbound approach experiences delay that exceeds level of service standards. This roadway is a County roadway. WSDOT has received feedback from the public about delay and congestion. WSDOT planning efforts have identified improvements needed. Adding capacity on 119th will facilitate improve LOS scoring and reduce congestion on the county roadway. The signalized intersection was designed and built to accommodate future widening on 119th. The signal operations cannot improve without improvements made on local roadway network.
16	n/a	n/a	n/a	Traffic	SR 500 (NE 117th Ave) & NE 65th St. Westbound approach experiences high level of delay. Future right turn lane would better facilitate movement and improve efficiency at signalized intersection. If not intersection improvement, adding parallel routes for local traffic and better circulation to nearby access points to state highway and local roadway network.
17	n/a	n/a	n/a	Traffic	SR 500 (NE 58th St) & NE 199th Ave. High crash location and increase delay reducing LOS standards.
18	Table 10 WSDOT Projects - Intersections	32	10	Traffic	These locations on the table are two-way stop-controlled (TWSC) intersections, but I am not aware capacity deficiencies. SR 503 NE 154th St Improvements needed to address peak hour capacity deficiencies SR 503 NE 144th St Improvements needed to address peak hour capacity deficiencies SR 500 NE 19th St Improvements needed to address peak hour capacity deficiencies I-5 NB off-ramp SR 502 Improvements needed to address peak hour capacity deficiencies
19	WSDOT Projects - Road Segments	32	9	Planning	None of the projects listed in Table 9 are included any WSDOT plan or planning study. Consider renaming the table. Were these projects identified as needed improvements in the review of the travel demand model run/capacity analysis? If so, possibly rename the table title to reflect the analysis results.

Planning Staff - Map Recommendation #20

Comment #4 - Why did the Planning Commission VOTE NO

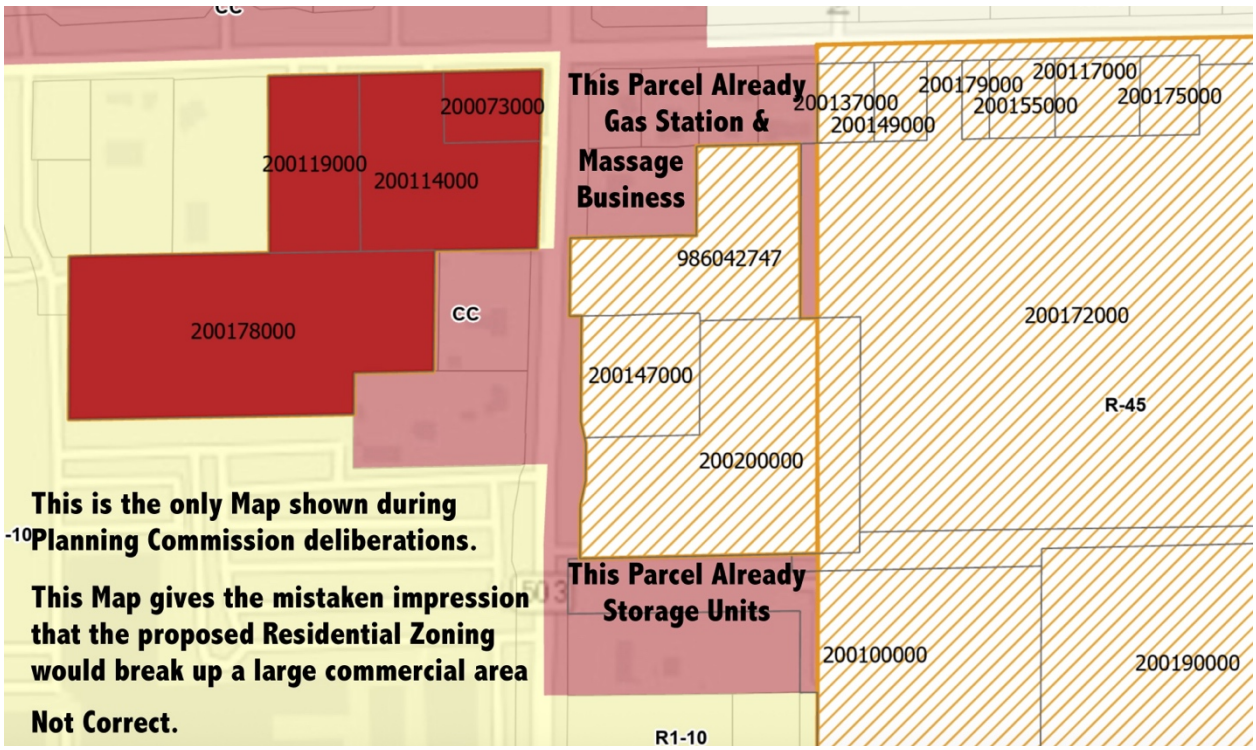
The first time the Clark County Planning Commission reviewed the Planning Staff Comp Plan Recommendations, the members unanimously approved Staff Recommendation #20. Residential Zoning for this property was not controversial.

But at the final vote, unexpectedly, Commissioner Ron Barca questioned #20.

This seemed to catch everyone, including Planning Staff off guard. Staff had not prepared for this controversy. Planning Staff did not present all the needed background information previously provided to Planning Commission, so the Commissioners could not make an informed decision.

In particular Planning Commission was not reminded of the following:

1) WSDOT has access restrictions affecting these properties making any access to HWY 503 very difficult, if not impossible.
2) That the property south of the proposed residential zoning was already built as storage units for the Promenade Apartment tenants.
3) That the property to the north is already built as a gas station.
4) That there is an existing bus stop and a signalize pedestrian crossing connecting this property to Prairie High School.
5) That there is an existing large commercial area including a grocery store, bank and dentist within walking distance of this property.



All the above information was already in the public record submitted over a year ago during the initial Comp Plan evaluations. Unfortunately, the Planning Staff did not present this important information again when the Planning Commission deliberated.

We believe that had the Planning Commission been presented this pertinent information, the commission would have approved the R-36 zoning.

So why did Commissioner Barca vote to deny the Residential zoning and influenced the other commissioners to follow suit?

All three separate owners of the three properties worked together to request Multi-Family Residential zoning.
Property 1 is a LLC owned by Ott Gaither,
Property 2 is a LLC owned by Mark Hough,
Property 3 is a LLC owned by Doug Kolberg.

The last comment of Commissioner Barca during the Planning Commission deliberations was “the county needs more commercial zoning.” He provided no findings to support this statement.

Two other Mixed Use Commercial properties along HWY 503, Staff Recommendations #21 and #22 also requested their zoning be changed to Residential R-36. If Commissioner Barca was concerned about Clark County needing to protect commercial uses, why didn’t Commissioner Barca object to those zone changes?

Please approve Residential R-36 zoning for Staff Recommendation #20 as well as reaffirm R-36 zoning for Recommendations #21 and #22.

Thank You,
Comment #4 by Walter Valenta