From: Cnty Community Planning
To: salsamike@comcast.net; Cnty Community Planning
Subject: RE: Comment on proposed Growth Plan
Date: Thursday, October 1, 2026 10:59:11 AM
Attachments: image001.png
image002.png
image003.png
image004.png

Good day, Mike,

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

This will be added to the Comprehensive Plan Index of Record. This will also be forwarded to be shared with the Council prior to tonight's Hearing.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: salsamike@comcast.net <salsamike@comcast.net>
Sent: Thursday, October 1, 2026 10:52 AM
To: Cnty Community Planning <CommunityPlanning@clark.wa.gov>
Subject: FW: Comment on proposed Growth Plan

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From: salsamike@comcast.net <salsamike@comcast.net>
Sent: Thursday, October 1, 2026 10:42 AM
To: salsamike@comcast.net
Subject: Comment on proposed Growth Plan

Request

Due to the procedural deficiencies and significant unmitigated impacts documented below, I respectfully request that the County Council delay taking action on the Preferred Alternative until at least two weeks after all materials to be voted on are presented to the public and the public has been given a meaningful opportunity to review and comment on those materials.

Comprehensive Written Comment on the 2025–2045 Comprehensive Plan Preferred Alternative

Submitted by: **Mike Eyster** Heights at Pleasant Valley October 1, 2026

I. Introduction

This written comment addresses both the **procedural deficiencies** and the **substantive flaws** associated with the County's Preferred Alternative for the 2025–2045 Comprehensive Plan update. My concern is the **overall process**, the **timing of document availability**, and the **lack of adequate analysis and mitigation** for foreseeable impacts — particularly in Pleasant Valley and the Vancouver Urban Growth Area (UGA).

To be clear, this comment is not about opposing growth, opposing apartments, or opposing increased housing supply. Growth is necessary, and housing diversity is necessary. The issue is whether the County has provided the analysis, sequencing, and infrastructure planning required to support that growth responsibly.

The Comprehensive Plan is a 20-year framework that will shape growth, transportation, schools, stormwater, and public services across Clark County. For a plan of this magnitude, the public must have meaningful time to review the materials, and the County must demonstrate concurrency, analyze impacts, and provide mitigation. Unfortunately, neither requirement has been met.

II. Procedural Deficiencies

1. Late Posting of Critical Hearing Materials

Although the hearing webpage displayed “Updated 9/29,” the actual hearing packet — including maps, exhibits, and the Preferred Alternative — was not accessible to the public until 9/30, less than 48 hours before the final decision hearing.

Planning documents are technical and complex. Members of the public require adequate time to digest this information if they are to provide meaningful input. When hundreds of pages of maps, exhibits, and policy amendments are posted only hours before a final decision hearing, the public cannot reasonably evaluate impacts or prepare informed testimony.

The materials posted late include:

- Preferred Alternative
- Vancouver UGA Comprehensive Plan map
- Vancouver UGA zoning map
- Arterial Atlas
- Title 40 amendments
- Capital Facilities Plan
- Planning Commission/Council Decision Table
- Policy Change Table
- Final Environmental Impact Statement (FEIS)
- Issue Paper 8 (summary of all proposed amendments)

These documents collectively exceed several hundred pages and form the core of the 20-year growth plan. Posting them this late does not meet the standard of meaningful public review expected under RCW 36.70A.140.

2. No Opportunity to Respond to the FEIS

The FEIS was issued July 24, 2026, but was not included in the hearing packet until September 30. The public cannot respond to the County’s responses to DEIS comments, which is a procedural deficiency under SEPA.

3. Incomplete Packet Until the Last Minute

For weeks, the County posted placeholders instead of the actual documents. The final packet was released only hours before the hearing, preventing meaningful review.

4. No Neighborhood-Specific Analysis

Pleasant Valley has:

- constrained arterials
- constrained collectors
- constrained school circulation
- constrained stormwater basins

Yet no Pleasant Valley-specific analysis or mitigation is provided.

5. No Concurrency Demonstration

Issue Paper 8 acknowledges:

- $1.5 billion in required transportation improvements
- $956.7 million in available revenue
- $539 million shortfall

Concurrency under RCW 36.70A.070(3) is not demonstrated.

6. No Mitigation Measures

SEPA requires mitigation for probable significant adverse impacts. None are provided for Pleasant Valley.

III. Substantive Flaws in the Preferred Alternative

Even if the procedural issues were resolved, the Preferred Alternative contains significant substantive flaws that warrant correction before adoption.

1. Transportation Impacts

a. Congestion and Safety in Pleasant Valley

Pleasant Valley already experiences severe congestion on:

- NE 139th
- NE 50th
- NE 72nd

School circulation at Pleasant Valley Primary and Middle is constrained and unsafe. The Preferred Alternative increases density in the Vancouver UGA, which will increase traffic volumes without providing the necessary improvements.

b. Funding Shortfall

The County cannot fund required improvements due to the $539 million deficit identified in Issue Paper 8.

c. Arterial Atlas Changes Posted Too Late

The Arterial Atlas changes were posted too late for public review.

2. School Impacts

Evergreen School District's proposed impact fee structure:

- increases single-family fees
- reduces multifamily fees
- multifamily produces more students per acre

Pleasant Valley schools are already constrained. No circulation or capacity improvements are provided.

3. Stormwater Impacts

Pleasant Valley's stormwater basins are:

- slope-constrained
- wetland-constrained
- downstream-constrained

The Preferred Alternative increases impervious surface without basin-wide mitigation.

4. Land Use and Zoning Impacts

Title 40 amendments:

- increase density
- reduce lot sizes
- add triplexes and quadplexes
- add co-living
- add transitional housing
- add supportive housing
- reduce parking requirements
- intensify mixed-use districts

These changes increase development pressure near Pleasant Valley.

5. Neighborhood Compatibility

The concern here is not opposition to growth or new housing. It is the absence of the standard planning analysis that ensures appropriate transitions between zones.

The Preferred Alternative does not include:

Evaluation of how proposed building height, scale, and density would transition to adjacent existing development patterns.

Nor does it include:

Analysis of building height, massing, and density transitions to ensure the proposed development integrates appropriately with surrounding land uses.

Nor the more technical:

Assessment of height, bulk, and density transitions between the proposed zoning and adjacent residential areas, consistent with standard land-use compatibility practices.

These are standard components of land-use planning. Their absence is a substantive flaw.

Without transition analysis, higher density adjacent to Pleasant Valley will:

- increase traffic
- increase noise
- increase parking spillover
- increase school strain

increase emergency response load
- reduce neighborhood compatibility

This is not a matter of preference; it is a matter of missing required analysis.

6. Property Value Impacts

High-density adjacency, congestion, and school strain are documented factors that depress single-family property values near the boundary. This is a foreseeable impact that requires analysis under SEPA.

IV. Request

Due to the procedural deficiencies and significant unmitigated impacts documented below, I respectfully request that the County Council delay taking action on the Preferred Alternative until at least two weeks after all materials to be voted on are presented to the public and the public has been given a meaningful opportunity to review and comment on those materials.

V. Conclusion

The plan cannot be adopted under the current conditions due to process failures, and even if it could be adopted, it should not be adopted due to the significant negative impacts on Pleasant Valley and other neighborhoods.

I appreciate the Council's consideration.