From: Jeffrey Delapena
To: "Cindy Marie Hosszu"
Subject: RE: Comp Plan Hearing Oct. 1, 2026
Date: Friday, October 2, 2026 8:15:00 AM
Attachments: image001.png
image002.png
image003.png
image004.png

Good day, Cindy,

I received one comment from you signed as Cynthia Hosszu on Sept. 29th which has been published on the 2025 Update comment site. Please see link below:

https://websvc2.clark.wa.gov/CommunityPlanning/2025CompPlanUpdate/39231110.pdf

I never received the below comment which was addressed only to the Council. I will save this in our record today.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Cindy Marie Hosszu <chosszu@gmail.com>
Sent: Thursday, October 1, 2026 8:39 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Fwd: Comp Plan Hearing Oct. 1, 2026

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.

Hi,

A friend said she can't see my public comments and to forward to you. I put a comment on the portal and sent the below email as well.

Thank you,
Cindy Hosszu
Sent from my iPhone

Begin forwarded message:

> **From:** Cindy Marie Hosszu <chosszu@gmail.com>
> **Date:** September 29, 2026 at 3:13:45 PM PDT
> **To:** Sue Marshall <Sue.Marshall@clark.wa.gov>, Glen Yung <Glen.Yung@clark.wa.gov>, michelle.belkot@clark.wa.gov, wil.fuentes@clark.wa.gov, matt.little@clark.wa.gov
> **Subject: Comp Plan Hearing Oct. 1, 2026**
>
> Dear Clark County Council Members,
>
> I am writing to oppose any County action that would allow substantial additional development in or around the NE 179th Street corridor before transportation infrastructure, utilities, emergency access, and other public facilities are funded, constructed, and capable of serving that development.
>
> This concern is especially urgent in the NE 179th Street area near Ridgefield, where existing rural residences, agricultural acreage, livestock operations, and road users are already affected by congestion, incomplete road connections, unsafe intersections, and identified transportation-concurrency deficiencies. The County should not respond to those deficiencies by lowering, redefining, or otherwise weakening the definition of a road "failure." The County should fix the real-world infrastructure problem.
>
> Under Washington's Growth Management Act, development is supposed to follow adequate public facilities—not force existing residents to bear the consequences of infrastructure that arrives years late, remains unfunded, or

is never completed.

State concurrency requirements

Washington law requires counties planning under the Growth Management Act to adopt and enforce ordinances that prohibit development approval when development would cause the level of service on a locally owned or locally or regionally operated transportation facility to fall below the standards adopted in the comprehensive plan—unless transportation improvements or strategies are made concurrent with the development. "Concurrent with development" means the improvements are in place when development occurs, or that a financial commitment is in place to complete them within six years. RCW 36.70A.070(6)(b).

State regulations define adequate public facilities as those with enough capacity to serve development "without decreasing levels of service below locally established minimums." WAC 365-196-210. The purpose of concurrency is to ensure that facilities and services needed to support development are adequate when the development becomes available for occupancy and use, without reducing service below local minimum standards. WAC 365-196-840.

These requirements are not intended to be satisfied by approving development first and promising that capacity will eventually be addressed. They require an honest assessment of whether facilities can serve the development, clear identification of the improvements needed, credible funding, and an enforceable schedule.

The Growth Management Act also directs counties to encourage development in urban areas where adequate public facilities and services already exist or can be provided efficiently. That principle should guide every decision affecting the NE 179th Street area.

Clark County's own standard

Clark County Code 40.350.020 establishes the County's Transportation Concurrency Management System. County materials describe a corridor standard based on a volume-to-capacity ratio of 0.90 or less. Under that standard, a road operating above 90 percent of capacity is deficient.

County materials have identified failure conditions in the NE 179th Street area, including NE 179th Street between NE 29th and NE 50th avenues and the NE 179th Street/NE 50th Avenue intersection, which has been identified as Level of Service F—the worst level of service rating.

The County has also recognized that this corridor requires major projects to accommodate development-generated traffic and preserve mobility and safety. Current plans include corridor improvements and reconstruction at NE 179th Street and NE 29th Avenue, where the County is replacing the existing all-way stop-controlled intersection with a roundabout. The project budget is listed at $23.2 million.

These facts demonstrate that the area's road system is already strained. They do not support adding more development before the promised transportation network is operational and proven adequate.

Do not redefine failure

I am particularly concerned by the apparent proposal to change how the County defines or measures a road failure. Changing a formula, raising a threshold, altering a calculation method, or relabeling a deficiency does not improve the actual transportation system.
It does not:

- Build missing road connections.
- Add safe and usable capacity at failing intersections.
- Reduce the queues residents experience every day.
- Make it easier for emergency vehicles to travel through congestion.
- Improve safe access to homes, businesses, farms, or livestock properties.
- Reduce dangerous cut-through traffic on local and rural roads.
- Make it safer for school buses, pedestrians, cyclists, farm equipment, hay trucks, livestock trailers, delivery vehicles, and commuters.

Residents do not experience transportation conditions through a spreadsheet. They experience them while waiting at backed-up intersections, trying to leave driveways, dealing with traffic on rural roads, moving livestock or equipment, and depending on emergency response.

If the County's existing standard shows that a corridor or intersection is failing, the appropriate response is to fund and complete the necessary improvement; require developers to provide enforceable mitigation; phase, delay, or deny additional development; or revise the land-use assumptions driving the failure. It is not responsible governance to redefine the failure out of existence.

Agricultural and livestock impacts

The NE 179th Street area contains productive agricultural land, livestock acreage, rural homes, and working landscapes. This land should not be treated as vacant land waiting for urban-scale development and road expansion.

Agricultural land is not expendable. It supports local food production, farm businesses, livestock operations, agricultural employment, equipment and feed suppliers, and the County's rural economy. Once a farm parcel is paved over, fragmented, cut off from access, or made impractical to operate, that loss is effectively permanent.

Road and development decisions must preserve practical access for tractors, farm trucks, livestock trailers, hay deliveries, equipment, and existing rural driveways. The County must also consider the effects of road widening, increased traffic, drainage changes, utility corridors, lighting, noise, and parcel fragmentation on the viability of working farms.

High-density housing immediately adjacent to those who maintain livestock on acreage will also create predictable conflicts for both newcomers and existing residents. Livestock operations involve normal and lawful conditions such as animal sounds, odors, manure management, dust, flies, fencing, equipment use, trailers, deliveries, and early-morning or seasonal work. New residents may not understand those realities when they purchase or rent housing near agricultural operations.

At the same time, established farmers and other livestock owners may face complaints, trespass, unleashed dogs, litter, traffic hazards, pressure to restrict ordinary farm practices, and increased liability concerns. It is unfair to approve incompatible development and then expect existing rural residents to change lawful uses of their land for people who moved next to

them later.

Before considering density near agricultural and livestock properties, the County should require meaningful buffers, agricultural disclosure notices for buyers and renters, safe farm access, protections against trespass and unleashed dogs, and enforceable protections for existing lawful agricultural practices.

Infrastructure must come first

The County should not approve additional development based on speculative future projects, unfunded plans, or road improvements that have not been built. A project listed in a long-range plan is not the same as capacity that is available today.

Under RCW 36.70A.070(6)(b), transportation improvements must be in place when impacts occur or supported by a financial commitment that will complete the improvements within six years. The County's capital-facilities planning must identify existing capacity, forecast future needs, specify proposed facilities, and include a six-year financing plan with identified public funding sources. If probable funding does not meet existing needs, the County must reassess and coordinate its land-use, capital-facilities, and financing plans.

The Council should not approve land-use changes, subdivision proposals, high-density housing, or other growth-dependent projects in the NE 179th Street area unless the County can demonstrate, publicly and with current data, that all of the following are true:

- Existing road segments and intersections meet the County's adopted level-of-service and concurrency standards.
- Any deficient roads or intersections have specific, funded, enforceable improvements with clear completion dates.
- Funding is secured rather than assumed, deferred, or dependent on uncertain future revenue.
- Development approvals include enforceable and proportionate developer responsibility for the transportation capacity they require.
- Road projects are complete, or legally committed for completion within the statutory six-year concurrency period.

- Emergency access, road safety, drainage, utilities, and other necessary public facilities will serve the development without harming existing residents.
- Agricultural parcels, livestock operations, rural access, drainage systems, and farm mobility are protected.
- The County has not weakened or manipulated its standards solely to make deficient roads appear compliant.

Requested Council action

I respectfully ask the Clark County Council to:

- Retain a clear, objective, and protective concurrency standard in Clark County Code 40.350.020.
- Reject any proposal that redefines or obscures roadway failure without providing actual physical improvements and capacity.
- Publish the traffic-volume data, volume-to-capacity calculations, intersection level-of-service data, project assumptions, funding sources, construction schedules, and remaining deficiencies for the NE 179th Street corridor.
- Identify every approved, pending, and proposed development that contributes traffic to NE 179th Street and disclose the specific mitigation required of each project.
- Require real, enforceable financial commitments before treating road improvements as concurrent with development.
- Delay, condition, or deny development that would cause or worsen concurrency failure.
- Protect farmland, livestock acreage, and rural residences from being fragmented, overwhelmed, or made less viable by urban-scale growth and incomplete infrastructure.
- Require buffers and agricultural-protection measures where new development is proposed near working farms and livestock properties.
- Reassess the County's land-use assumptions if the capital-facilities plan cannot demonstrate adequate and funded infrastructure.

Clark County has an opportunity to plan responsibly: build and fund the infrastructure first, protect working land and established rural residents, and then allow development at a pace the transportation system can actually support.

Approving more growth while roads already fail—and then changing the definition of failure to avoid accountability—would undermine public trust, shift costs to existing residents and taxpayers, and create lasting conflicts between new urban development and the agricultural community that has long existed in this area.

Please require functioning, funded, and adequate infrastructure before approving more development in the NE 179th Street corridor.

Sincerely,

Cindy Hosszu
2021 NE 189th St
Ridgefield, WA 98642
Chosszu@gmail.com
(360) 606-0691