From:	Cnty Community Planning
To:	salsamike@comcast.net
Cc:	Cnty Community Planning; Rebecca Messinger
Subject:	FW: Comment on Clark County Growth Mgt Plan 10-8-26
Date:	Thursday, October 8, 2026 8:09:56 AM
Attachments:	Clark County Growth Mgt Plan 10-8-26.docx image001.png image002.png image003.png image004.png

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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 has also been forwarded to be shared with the Council.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: salsamike@comcast.net <salsamike@comcast.net>
Sent: Thursday, October 8, 2026 4:28 AM
To: Cnty Community Planning <CommunityPlanning@clark.wa.gov>
Subject: Comment on Clark County Growth Mgt Plan 10-8-26

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Attached are my comments re: the Growth Plan Update. Please include these comments in the public record and share with the Councilors and Planning staff.

Within my comments I have noted that I've been unable to locate parcel level data on zoning in the information made available to the public. If that information exists, I would very much appreciate you sharing it with me.

A number of people in this area very concerned about the impact the anticipated plan would have. I anticipate that you will hear from many of them.

Thank you

Mike Eyster

Comment on the Clark County Growth Management Plan Update

Submitted by: Mike Eyster, Heights at Pleasant Valley

My name is Mike Eyster, and I live in the Heights at Pleasant Valley. The County's Growth Management Plan update introduces zoning changes that, if implemented, will significantly degrade an extensive area north and south of NE 139th Street between 50th Avenue and 72nd Avenue. To date, I have been unable to locate any parcel-level zoning detail in the publicly available materials describing the zoning changes scheduled for a County vote on October 13. Without this detail, residents cannot determine how these changes interact with existing infrastructure capacity, transportation limitations, or established development patterns. This lack of clarity raises serious concerns about the feasibility and compatibility of any proposed redesignation.

Based on the County's materials, it appears the area south of NE 139th Street between NE 72nd Avenue and NE 50th Avenue may be considered for high-density residential zoning. If this is correct, it would significantly degrade a large, well-established residential district of 300 to 400 acres. These neighborhoods—including the Heights at Pleasant Valley—were intentionally planned as cohesive communities with moderate-density single-family homes, internal circulation, pedestrian connections, stormwater systems, and CC&Rs that support long-term stability and neighborhood quality. These characteristics are not accidental; they reflect decades of coordinated planning that produced a functional, compatible, and successful residential area.

The area south of NE 139th Street is a distinct residential pocket within the northern Vancouver Urban Growth Area. Although built over time, the subdivisions share a consistent development pattern: compatible lot sizes, similar building forms, predictable circulation routes, and a unified neighborhood structure. This continuity is a major reason the district functions well today and contributes positively to Vancouver's overall livability. Introducing high-density zoning into this location would undermine those established patterns and fundamentally conflict with the planning framework that has guided this area for decades.

The implications of such a redesignation cannot be evaluated without parcel-level clarity, infrastructure analysis, and compatibility review. In the absence of such detail in the publicly available materials, the County has not demonstrated that any increase in intensity would be compatible with the area's infrastructure or development pattern. Any increase in density should be assessed not only by the number of units it produces but also by how well it fits the existing development pattern, street network, and infrastructure systems. Abrupt changes in density can create substantial conflicts such as increased traffic on streets not designed for higher-density use, added pressure on stormwater systems, and incompatibilities between different residential forms. These issues warrant careful analysis and clear public communication.

R-32 allows three- to four-story multifamily buildings, larger footprints, higher lot coverage, and reduced setbacks. These forms represent a pronounced increase in height, massing, and density

compared to surrounding single-family neighborhoods. In areas where higher-density uses are appropriate, they are usually introduced through transitional zoning or design standards that moderate the interface between different residential types. None of those elements exist here.

Higher-density residential uses are typically placed along major transportation corridors, near commercial centers, or adjacent to areas already planned for more intensive development. This approach ensures that increases in height, massing, and population occur gradually and predictably. The neighborhoods south of NE 139th Street were designed around moderate-density residential use. Any significant departure from that pattern should be evaluated carefully to ensure it does not undermine neighborhood stability or functionality.

If the area south of NE 139th Street were redesignated to a high-density category such as R-32, it would represent a substantial increase in intensity within the center of an established R-7.5 district. Without transitional zoning, buffering, or infrastructure upgrades, such a change would create an immediate and unmitigated jump in scale. High-density residential uses typically require enhanced transportation capacity, expanded stormwater facilities, and more robust utility infrastructure. Placing such uses in the middle of a moderate-density neighborhood—rather than along a major corridor—risks creating conflicts related to traffic, parking, building scale, and overall compatibility.

An abrupt shift to R-32 density would destabilize the surrounding neighborhood, permanently alter its residential character, and create severe, unresolvable conflicts with every adjacent street and subdivision across a broad, multi-neighborhood area.

NE 72nd Avenue is the primary north–south circulation route for a large portion of the community, and it already operates at or near functional capacity during peak periods. The roadway was designed as a neighborhood-scale corridor, with narrow travel lanes, limited shoulders, no center turn lane, and constrained opportunities for widening without significant right-of-way acquisition. It currently carries school traffic, local residential circulation, and regional cut-through volumes that exceed what the original design intended.

Based on data collected by the County, NE 72nd Avenue is already problematic and dysfunctional. Adding significant housing density at NE 139th Street will exacerbate these issues and extend them both north and south along the corridor.

NE 72nd Avenue already functions as a major arterial without major-arterial infrastructure. Existing high-density development between NE 119th Street and NE 134th Street has produced persistent peak-hour congestion, long queues at signalized intersections and stop-controlled approaches, multi-cycle delays for left turns, increased cut-through traffic into adjacent neighborhoods, and conflicts between regional through-traffic and local residential circulation.

Introducing another large concentration of high-density units would further burden an already constrained corridor, compounding existing congestion and creating additional safety concerns for pedestrians, cyclists, school traffic, and neighborhood residents. The cumulative effect of funneling substantially higher traffic volumes onto 72nd Avenue would not only degrade

mobility but also alter the fundamental character and function of the roadway. This classification does not align with the roadway's physical design, width, or operational capacity.

A corridor or neighborhood system reaches failure not when one component breaks, but when multiple stressed components interact. NE 72nd Avenue already exhibits overloaded traffic volumes, insufficient pedestrian protection, abrupt land-use transitions, ongoing high-density construction, and no remaining capacity for additional peak-hour demand. Under these conditions, any additional high-density designation at NE 139th Street would push the corridor beyond functional failure, creating a system-wide breakdown in mobility, safety, and neighborhood circulation.

NE 139th Street between NE 50th Avenue and NE 72nd Avenue is classified as a Local Access Road—the lowest-capacity classification in the County's transportation hierarchy. It is designed for short neighborhood trips, low traffic volumes, direct driveway access, and minimal peak-hour loading. Today it operates as a quiet, rural-scale neighborhood road with narrow lanes, no center turn lane, no shoulders, limited pedestrian facilities, and multiple residential driveways. Its design reflects its intended purpose: to serve existing single-family homes at moderate density.

High-density development south of NE 139th Street would overwhelm this corridor. Multifamily development generates substantially higher daily and peak-hour traffic volumes, including concentrated morning and evening surges. A Local Access Road is not engineered to absorb these volumes. The result would be congestion, queueing, turning conflicts, driveway blockages, and increased cut-through traffic into adjacent neighborhoods. The County's roadway classification system makes clear that Local Access Roads are not appropriate locations for high-density residential zoning, rendering the proposed redesignation incompatible by definition. Local Access Roads are intentionally designed for the lowest-intensity residential uses; applying high-density zoning to such a corridor contradicts the fundamental purpose of the roadway classification system.

The neighborhoods surrounding NE 139th Street represent a stable, intentionally planned residential district designed for moderate-density single-family living. The built environment, infrastructure systems, and governance structures were all created to support this level of intensity, and they function effectively within that framework. Introducing high-density zoning into the center of this district would disrupt that stability, create incompatible land-use transitions, and place additional strain on a transportation corridor already operating beyond its intended capacity. Growth is necessary and welcome, but it must be placed where infrastructure, context, and planning principles support it. The incompatibility between the proposed zoning and the area's infrastructure, street hierarchy, and established development pattern constitutes a fatal flaw that cannot be mitigated through conditions or design standards. For these reasons, the proposed redesignation should be withdrawn until a complete, parcel-level analysis demonstrates that the area can support such intensity — a threshold it clearly does not meet today.