From:	Cnty 2025 Comp Plan
To:	jasonluthergreen@gmail.com; Cnty 2025 Comp Plan
Cc:	Rebecca Messinger
Subject:	RE: Comprehensive Plan Update Comments
Date:	Tuesday, October 13, 2026 11:59:49 AM
Attachments:	image001.png image002.png image003.png image004.png

Hello Jason,

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

Confirming this has been received and will be added to the Comprehensive Plan Index of Record. Forwarding to additional staff as well to be shared with the council.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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From: Clark County <webteam@clark.wa.gov>
Sent: Tuesday, October 13, 2026 11:59 AM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: Comprehensive Plan Update Comments

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Submitted on Tue, 10/13/2026 - 11:58 AM

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Jason

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Organization/Agency Name
Individual

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Message Subject
88 acre property at 139th Street and NE 50th Avenue

Comments
We write regarding the 88-acre site at the intersection of NE 139th Street and NE 50th Avenue. We support redesignating the site from its current low-density residential zoning to a medium-density residential zone. We also object to how the County plans to serve that density. The upzoning is the right land use decision. Approving it without funded road, sidewalk, and parking solutions is not.

Why medium density is right for this site
The Growth Management Act directs the County to plan for 20 years of population and housing growth inside urban growth areas, and to do it with urban densities. Eighty-eight acres inside the Vancouver urban growth area is a rare contiguous block. Zoned for low density, it yields a limited number of large-lot homes. Zoned for medium density, it can deliver a broader mix of housing types at prices more households can reach, and it makes better use of the water, sewer and stormwater service the area already pays for.

Medium density also supports the County's own direction on middle housing and on consolidating residential districts. It spreads land and infrastructure costs over more homes and eases pressure to expand the urban growth area onto farm and forest land. [Insert site-specific capacity figures, projected unit range and comparison to the current zone.

Where we dissent: the transportation plan does not match the density

More homes mean more trips. At medium density, the site will add households and daily trips to a road network that was built for rural and low-density traffic. The comprehensive plan and capital facilities program do not yet show how that demand will be served. We see four gaps.

First, road capacity. NE 139th Street and NE 50th Avenue carry traffic on rural cross sections with limited shoulders and no turn lanes at key intersections. State and County rules require that transportation improvements be made concurrent with development. Residents and applicants across the north county have already raised concurrency concerns on parallel corridors, including NE 179th Street. We ask the County to show, in the plan, which capacity projects serve this site and when they will be built.

Second, sidewalks. There are no continuous sidewalks along the site frontage or on the routes to nearby schools, transit stops and commercial services. Adding hundreds of households to roads with no walking facilities puts residents, including children, on road shoulders. The County's own transportation needs work tracks missing sidewalk length by roadway segment. The density we are supporting should not take effect until a safe walking network exists.

Third, parking. The County's July 15, 2026, draft amendments to Clark County Code 40.340.010 would cut minimum off-street parking for multifamily development from 1.5 spaces to 0.5 spaces per dwelling unit. The draft sets a minimum of 1 space per unit for single-family homes, townhouses, duplexes, triplexes, quadplexes and cottage housing, and removes minimums for units under 1,200 sq. ft., affordable and senior housing, and co-living. A medium-density plan for 88 acres will therefore be built with fewer on-site spaces than households own vehicles. That demand has to go somewhere.

In this area, it has nowhere to go. The surrounding roads have no on-street parking lanes, no curbs and no public parking lots. Nearby commercial, school and park uses park their own users on site and have no spare capacity. Visitors, second and third household vehicles, service and delivery trips, and overflow from community amenities would spill onto road shoulders, into neighboring subdivisions and onto private lots. That blocks emergency access, narrows already limited shoulders, and conflicts with the walking facilities we are asking the County to build. Lower parking minimums work where transit, walkable streets and public parking already exist. This area has none of the three.

Fourth, funding and timing. Road, sidewalk and parking projects that appear only on long-range lists do not meet a household's need on move-in day. Without a funding source and a delivery date, the burden shifts to existing neighbors and to future residents.

What we request

- Approve the medium-density designation for the site as proposed.
- Add the NE 139th Street and NE 50th Avenue road improvements and sidewalk connections serving the site to the transportation element and the six-year transportation improvement program, with identified funding.

• Tie development phasing to transportation delivery, so that building permits and occupancy track the completion of frontage and off-site improvements.
• Require sidewalks, curb, gutter and bike facilities along all site frontage as a condition of development, and identify off-site gap segments to schools, transit and services.
• Apply a site-specific parking standard. Where the reduced code minimums would leave this area without a public or on-street parking option, require guest and overflow parking on site, set at a ratio supported by a parking demand study, and allow shared parking among compatible uses.
• Require on-street parking bays, designated guest parking areas and enforceable no-parking designations in the street design, so overflow does not block emergency access or sidewalks.
• Establish a fair, proportionate cost-sharing approach, such as a development agreement or transportation impact fee credits, so that funds its share and the County funds the rest.

Our commitment

Construct frontage improvements, dedicate right-of-way, provide a parking program sized to demonstrate demand, and work with County Public Works on a phasing plan. We ask the County to match that commitment by scheduling and funding the network improvements that only the public sector can deliver.

Density without infrastructure creates a problem for everyone. Density with infrastructure creates a neighborhood. We urge the Council to approve the upzoning and to commit to the road, sidewalk, and parking solutions that make it work. Thank you for considering this statement.

Respectfully submitted,

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