



**Washington State  
Department of Transportation**

**Southwest Region**  
11018 Northeast 51st Circle  
Vancouver, WA 98668-1709  
360-905-2000 / Fax 360-905-2222  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

November 7, 2018

Oliver Orjiako  
Clark County Community Development  
1300 Franklin Street  
Vancouver, WA 98666

Re: Comprehensive Plan Amendment to remove Urban Holding  
CPZ2018-00021  
Interstate 5, MP 9.52

Dear Mr. Orjiako:

The Washington State Department of Transportation (WSDOT) staff has reviewed the staff report to amend the Comprehensive Plan to remove Urban Holding Overlay on approximately 143 acres east of the I-5/NE 179<sup>th</sup> Street interchange. Approval will allow the applicant to develop the site with 606 single family homes and 99 townhomes. WSDOT would like to express our concerns and offer the following comments.

WSDOT supports the economic development and long-term growth of Clark County and the cities within it. The I-5/NE 179<sup>th</sup> Street interchange is an important link in the transportation network and is vital for the movement of people, goods, and services. It is imperative to preserve the safety and capacity of this interchange and the NE 179<sup>th</sup> Street corridor.

In 2016 the Washington State Legislature allocated \$50 million for improvements to the I-5/NE 179<sup>th</sup> Street interchange. These funds will not be available until the '23-'25 biennium and the interchange improvements are not anticipated to be operationally functional until 2028. The existing interchange lacks adequate capacity for any additional development that would use it as a connection to the road network until those improvements are completed. The development of the parcels in question will add a significant number of new vehicular trips to the existing interchange and further degrade the safety and capacity.

Clark County has identified a number of safety and capacity improvements for the NE 179<sup>th</sup> Street corridor that are necessary to serve urban development. These transportation improvements are forecasted to cost approximately \$12 million. The applicant has expressed a willingness to accelerate the payment of TIF funds of approximately \$2.9 million but this would leave remaining shortfall of \$9 million that would need to be identified. At this time there is no identified funding source to fill this shortfall.

For safe and reliable travel, it's critical that both the NE 179<sup>th</sup> Street improvements and the I-5 interchange improvements are either in place or considered fully funded prior to the removal of the Urban Holding designation. Based on the information contained in the Clark County Staff Report and timing of WSDOT funding for the interchange, WSDOT supports the staff report recommendation of denial for this proposal.

Thank you for the opportunity to comment on this project. If you have any questions or need additional information, please contact Jeff Barsness, Southwest Region Development Services Engineer, at 360-905-2059.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Williams", with a horizontal line extending to the right.

Michael A. Williams  
Planning Manager

MW: jb