August 27, 2015

Clark County Community Planning
Attn. 2016 Comp Plan Record
1300 Franklin Street PO Box 9810
Vancouver, WA 98666-9810

Re  Clark County 2016 Comprehensive Plan Update

Dear Comprehensive Plan Team

The Washington State Department of Transportation (WSDOT) has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Clark County 2016 Comprehensive Growth Management Plan Update. WSDOT reviews this document with great interest, as this update could result in a significant increase of traffic on the state highway system, as well as county transportation facilities.

WSDOT’s vision of providing a sustainable and integrated multimodal transportation system requires us to utilize all available capacity on our system and leverage our limited resources. This is only possible by working together with communities and other partners. WSDOT recognizes city and county plans as the cornerstone of community decision-making. Therefore, we think it is important for WSDOT to participate, listen to and understand these goals and plans, and share WSDOT strategies and policies for implementing a multimodal transportation system.

Four alternatives are currently under review. WSDOT endorses Alternative 1, as this alternative would not change the current UGA boundaries, policies and regulations as adopted in 2007 and updated to July, 2014. More information is needed for WSDOT to make a determination regarding Alternative 3. However, it appears that Alternative 2 and Alternative 4 would have a significant impact on the state highway system. As noted in this document, these alternatives have a high potential for impacts to the transportation system, due to the great potential for more intensive development spread across a larger geographic area. This DSEIS states that full development under these alternatives would not happen quickly, but incrementally over the planning period. However, the cumulative impact of adding additional transportation facilities to support development allowed under these alternatives could be significant, and would change the character of rural Clark County. It also points out that these infrastructure costs could be prohibitive to the county. Due to limited funding, WSDOT will be challenged in the future to provide the needed infrastructure to provide an adequate level of service for Alternatives 2 and 4.
Therefore, WSDOT respectfully requests that Clark County perform a traffic study of all of the alternatives before a preferred alternative is selected. This study should be adequate to allow the county to make an informed decision by seeing the potential impacts of these alternatives. It should also be able to allow WSDOT and other public agencies to provide a proper response to these proposed alternatives before a preferred alternative is selected. WSDOT also requests that the comment period for the DSEIS be extended to a date after the transportation study is completed. This comment period should be set to allow sufficient time for WSDOT and other public agencies to incorporate the study in the review and comment on the DSEIS.

These comments are based on a review of the DSEIS, and are preliminary only. WSDOT will likely provide additional comments as the 2016 Comprehensive Growth Management Plan Update continues through the development process.

Thank you for providing the opportunity to comment on this document. If you have need of additional information, please contact Mr. Ken Burgstahler, Southwest Region Planning Office, at (360) 905-2052.

Sincerely,

Michael A. Williams
Southwest Region Planning Manager

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cc Board of Clark County Councilors