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Cc: [Oliver Orjiako](mailto:Oliver.Orjiako@clark.wa.gov); [Jose Alvarez](mailto:Jose.Alvarez@clark.wa.gov)
Subject: RE: How the arterial atlas and County code created a system that results in approving developments while infrastructure fails/Concurrency and Comp Plan implications
Date: Monday, March 2, 2026 9:12:00 AM
Attachments: [Atlas Concurrency CompPlan Summary.pdf](#)
[Arterial Atlas Concurrency Analysis.pdf](#)

Good day, Heidi,

Thank you for providing this feedback related to the 2025 Comprehensive Plan Update.

I am forwarding to members of Staff, and this will be entered into the Index of Record.

Best,

Jeff Delapena
Program Assistant
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-----Original Message-----

From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Sunday, March 1, 2026 5:10 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>
Cc: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: How the arterial atlas and County code created a system that results in approving developments while infrastructure fails/Concurrency and Comp Plan implications

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Dear Clark County Council,

For years I've been hearing competing perspectives. On the one hand, neighbors in the 179th area look at the number of developments being approved one after the other with little movement on infrastructure improvements that were required to be in place by now with concern that the roads will not handle the load. On the other hand, County Staff comment that each new development starts a new 6-year clock and the roads are not failing. While traffic studies are now showing failing roads and intersections in build-out horizons, there is a broader systemic failure of the concurrency system. Those studies are based on a road system that does not exist today. The combination of the arterial atlas and codes create a situation that does not put the brakes on developments even as failures have begun to arise. The attached documents explain the interlocking system that results in approvals even

though concurrency issues exist. This situation has implications for how concurrency is evaluated and for the 2025 Comp Plan.

I appreciate the challenges you face while trying to weigh all the different perspectives in resolving these issues. However, there is a need to balance infrastructure, development/housing and jobs. And the current plan is to continue on a trajectory that exacerbates the imbalance in the 179th area. The GMA requires a different path.

Best,

Heidi

ARTERIAL ATLAS UPDATE AND TRANSPORTATION CONCURRENCY: HOW THE ARTERIAL ATLAS AND CONCURRENCY CODE CREATE AN INTERLOCKING APPROVAL SYSTEM

179th Street Corridor, Clark County, Washington

Prepared for Clark County Council

March, 1 2026

1. Executive Summary

In July 2023, the Clark County Council adopted the 179th Street Access Management and Circulation Plan (CPZ-2021-00013), which included amendments to the County's Arterial Atlas. The stated purpose was to guide orderly development of the road network as the 179th Street corridor develops. The plan added and reclassified roads—including neighborhood circulators, collectors, and commercial/industrial streets—and designated intersection types including approximately 13 roundabouts throughout the corridor. What does not appear to have been presented to Council is the consequence of those atlas amendments for the County's transportation concurrency system.

This analysis provides additional support for the position that Clark County should impose a development moratorium in the 179th Street corridor until transportation infrastructure is built to match the capacity being credited in development approvals. It demonstrates that the County's concurrency system, as currently structured, is incapable of denying any development application on transportation grounds—even when traffic studies document Level of Service failures at corridor intersections.

The analysis identifies four interlocking mechanisms that, working together, ensure every development application passes concurrency review regardless of actual road conditions:

1. Inflated capacity: The 2023 arterial atlas update assigns built-out road classifications to roads that have not been constructed to their classified standard. Two-lane roads are credited with four-lane capacity in every volume-to-capacity calculation, doubling or tripling the capacity denominator and masking real failures.

2. Limited study area: Tiered distance requirements restrict most traffic studies to a 1–2 mile radius, preventing analysis of the worst-performing intersections when they fall outside the study boundary.

3. Paper cure for failures: CCC 40.350.020(F)(6) allows intersections listed on the six-year Transportation Improvement Program to be treated as “in place and operational” for concurrency purposes—regardless of whether construction has begun, funding is secured, or completion will occur before the development generates traffic.

4. High mitigation threshold: Even when a failure survives all three preceding filters, the 5-trip/worsening rule means most individual developments escape mitigation requirements because their trips are distributed across multiple approaches.

This analysis is not an accusation of deliberate intent. There is no indication that staff designed these mechanisms to circumvent concurrency protections, nor that Council understood the atlas amendments would have this effect when they were adopted. Each mechanism—the atlas classifications, the distance tiers, the TIP credit, the mitigation threshold—was established independently and serves a legitimate planning purpose in isolation. The problem is their interaction: when combined, they produce an outcome that none was individually designed to create. It is this structural interaction, not any individual decision, that has rendered the concurrency system nonfunctional as a check on development in the 179th Street corridor.

The practical result is a concurrency system that evaluates each development in isolation and cannot say no to any of them—while the cumulative traffic from all approved developments loads onto roads that are already over their actual capacity. Traffic studies for active development applications already document LOS F conditions at multiple corridor intersections, yet each application passes concurrency review. This is how the interlocking provisions operate when applied together. But it means that concurrency review in the 179th Street corridor is not functioning as the constraint on development that the Growth Management Act requires.

This finding reinforces the need for a development moratorium. When the regulatory system designed to protect infrastructure adequacy cannot reject any application, the only remaining safeguard is a moratorium that halts approvals until the gap between credited capacity and actual capacity is closed. The detailed evidence supporting this conclusion is presented in the sections that follow.

2. How the Arterial Atlas Drives Concurrency Determinations

Clark County Code 40.350.020 establishes the transportation concurrency management system. Under this system, roadway segment capacity is determined by the road's classification in the arterial atlas. The classification code directly sets the capacity value used in volume-to-capacity (v/c) ratio calculations.

The classification codes work as follows: Each code describes the road's intended configuration. For example, "Pr-4cb" means Principal Arterial, 4 lanes, with center left turn lane (CLT) and bike lanes. "M-2cb" means Minor Arterial, 2 lanes, with CLT and bike lanes. "C-2b" means Collector, 2 lanes, with bike lanes. The number of lanes in the classification directly determines the capacity assigned to that road segment for concurrency analysis:

Classification	Description	Capacity (veh/hr)	Source
Pr-4cb	Principal Arterial, 4 lanes, CLT & bike	1,800	CCC 40.350.020
M-4cb	Minor Arterial, 4 lanes, CLT & bike	1,800	CCC 40.350.020
M-2cb	Minor Arterial, 2 lanes, CLT & bike	900	CCC 40.350.020
C-2cb	Collector, 2 lanes, CLT & bike	900	CCC 40.350.020
C-2b	Collector, 2 lanes, bike lanes	800	CCC 40.350.020
R-2	Rural, 2 lanes	800	CCC 40.350.020
C-2b*	Collector, 2 lanes, bike (alternative)	600	CCC 40.350.020(G)(1)(a)

The critical point is this: when a road is classified as Pr-4cb in the arterial atlas, traffic studies assign it a capacity of 1,800 vehicles per hour. This is the capacity of a completed 4-lane urban arterial with a center left turn lane and bike lanes. If that road currently exists as a 2-lane rural road without turn lanes or bike lanes, the capacity used in concurrency analysis is double or more than what the road can actually carry today.

3. Atlas Classifications Versus Existing Road Conditions

The following table compares the arterial atlas classification used in traffic studies with the documented existing conditions of each road, as reported in the same traffic studies and the County's own 179th Street Circulation and Access Management Plan (October 2021). The existing conditions data comes from Table 1 of the NE 174th Street Subdivision Transportation Impact Study (December 4, 2025) and the Existing and Planned Conditions memorandum included in the July 18, 2023 Council hearing supporting documents.

Road Segment	Atlas Class.	Atlas Capacity	Actual Lanes	Actual Capacity	Curbs & Sidewalks	Bike Lanes	Capacity Gap
NE 179th St (Delfel to I-5)	Pr-4cb	1,800	4-5 (partial)	~1,200	Partial	None	+600
NE 179th St (I-5 to NE 15th)	Pr-4cb	1,800	2 (1/1)	~600-800	Partial	None	+1,000
NE 179th St (NE 15th to NE 29th)	Pr-4cb	1,800	2 (1/1)	~600-800	Partial	None	+1,000

NE 179th St (NE 29th to NE 50th)	Pr-4cb	1,800	2 (1/1)	~600-800	None/Partial	None	+1,000
NE 10th Ave (NE 199th to NE 179th)	M-2cb	900	2	~600-800	None	None	+100-300
NE 29th Ave (NE 179th to NE 189th)	M-4cb	1,800	2	~600-800	Partial	Partial	+1,000
NE 50th Ave (NE 179th to NE 174th)	M-2cb	900	2	~600-800	Partial/None	None	+100-300
NE 72nd Ave	Pr-4cb	1,800	2	~600-800	None	None	+1,000

Sources: Table 1, NE 174th Street Subdivision TIS (12/4/2025); Table 1, 179th Street Circulation and Access Management Plan Existing Conditions (10/2021); Staff Reports for Three Creeks East, Four Creeks North, and Kozy Manor Estates.

The County's own 2021 Existing Conditions memorandum documented NE 179th Street east of I-5 as "a rural, two-lane facility with limited sidewalks" providing "no bike lanes" throughout the corridor. The same traffic studies that use 1,800-vehicle-per-hour capacity for these segments simultaneously document their existing conditions as two-lane roads without the center left turn lanes and bike lanes indicated by the "cb" suffix in their classification codes.

4. Documented Capacity Exceedances Across Multiple Traffic Studies

Five recent traffic impact studies submitted for developments in the 179th Street corridor all use atlas-classified capacity values in their roadway segment analyses. Four of the five include corridor segment v/c analysis (the Kozy Manor Estates study analyzed only intersections, not corridor segments, due to its limited 1-mile study radius). Even with inflated capacity values, multiple road segments exceed Clark County's 0.90 v/c threshold. The following table compiles the failing segments identified across the four studies with corridor data, showing both the reported v/c ratio (using atlas capacity) and the estimated v/c ratio if actual current road capacity were used.

Table 4a: Cross-Study Roadway Segment Failures (V/C > 0.90 using Atlas Capacity)

Road Segment	Atlas Class.	Atlas Cap. (veh/hr)	174th St Sub (2028)	Three Creeks East (2028)	Four Creeks North (2028)	Ridgefield MS (2029)	Est. V/C at actual cap.
NE 179th St (Delfel Rd to I-5)	Pr-4cb	1,800	1.047	1.061	1.044	—	>2.0

NE 179th St (I-5 to NE 15th Ave)	Pr-4cb	1,800	1.149	1.173	1.141	1.12–1.13	>2.0
NE 10th Ave (NE 189th to NE 179th)	M-2cb	900	1.334	1.333	1.333	—	>1.5
NE 15th Ave (NE 179th to NE 174th)	M-2cb	900	0.979	0.991	0.979	1.07–1.08	>1.2
NE 10th Ave (NE 199th to NE 194th)	M-2cb	900	1.003	1.007	—	0.94–0.97	>1.2
NE 50th Ave (NE 179th to NE 174th)	M-2cb	900	—	1.130	—	—	>1.3
NE Delfel Rd (NE 189th to NE 179th)	M-2cb	900	—	0.906	—	—	>1.1
NE 139th St (NE 20th to NE 23rd)	M-4cb	1,800	0.871	0.943	—	—	>1.5

Red shading = exceeds 0.90 threshold. Orange shading = 0.90–1.00 (approaching failure). Dash (—) = segment not analyzed in that study.

Note: The Ridgefield MS study uses a 2029 horizon and slightly different segment boundaries (I-5 NB Ramp to NE 12th Ave; NE 12th Ave to NE 15th Ave; NE 179th to NE 189th for NE 15th Ave). The Kozy Manor study is excluded from this table because its 1-mile study radius included only intersection analysis, not corridor segment v/c ratios; however, it identifies NE 179th/NE 50th Ave as LOS F under both background and total traffic conditions.

Sources: NE 174th Street Subdivision TIS, Lancaster Mobley (Dec. 2025); Three Creeks East TIS, Lancaster Mobley (June 2025); Four Creeks North TIS (April 2025); Ridgefield MS TIA, Kittelson (June 2024); Kozy Manor Estates TIA, Kittelson (Feb. 2025); Clark County LOS Analysis (Jan. 2026).

The cross-study consistency is striking. The same road segments fail in every study that analyzes them:

NE 179th Street (I-5 to NE 15th Avenue): Four of five studies report v/c ratios between 1.12 and 1.17 for this segment—exceeding the 0.90 threshold by 24–30%. This is a two-lane road classified as Pr-4cb (1,800 veh/hr). At its actual 2-lane capacity of approximately 600–800 veh/hr, the true v/c would exceed 2.0—meaning traffic demand is more than double the road’s actual capacity.

NE 179th Street (Delfel Road to I-5): Three studies report v/c ratios of 1.044–1.061 for this segment, all using 1,800 veh/hr capacity for what is currently a two-lane road. The actual v/c ratio exceeds 2.0.

NE 10th Avenue (NE 189th to NE 179th): Three studies independently report a v/c ratio of 1.333–1.334—the highest segment-level failure identified anywhere in the corridor. This road is classified M-2cb (900 veh/hr). Since this classification already reflects a 2-lane road, the atlas capacity is closer to actual conditions, but the failure is still severe: the road is carrying 33% more traffic than its classified capacity.

NE 15th Avenue (NE 179th to NE 174th/189th): All four studies that analyze this segment report v/c ratios between 0.979 and 1.08—at or above the 0.90 threshold. The Ridgefield MS study, which extends the analysis to NE 189th Street, reports the highest ratio at 1.07–1.08.

The fact that independent consultants, using different development assumptions and slightly different study horizons, consistently arrive at the same failing segments confirms that these are systemic infrastructure deficiencies—not artifacts of any single traffic study. The right-most column in the table above shows the estimated v/c ratio if actual current road capacity were used instead of atlas-classified capacity. For segments classified as Pr-4cb (1,800 veh/hr) that are actually 2-lane rural roads (approximately 600–800 veh/hr), the actual v/c ratios would approximately double or triple the reported values. Every segment shown as exceeding 0.90 under atlas capacity would show catastrophic failure under actual conditions.

5. Roundabout Density and Traffic Flow Implications

The arterial atlas and circulation plan designate a significant number of roundabouts along the NE/NW 179th Street corridor between NW 11th Avenue and NE 50th Avenue. Based on the three-page circulation plan maps presented at the July 18, 2023 Council hearing, the WSDOT I-5 interchange project, and subsequent traffic studies, the corridor is planned to have approximately 13 roundabouts: 5 on the west side of I-5 (including the I-5 southbound ramp terminal) and 8 on the east side (including the I-5 northbound ramp terminal). These are identified in two tables below.

West Side: NW 11th Avenue to I-5 (5 roundabouts)

Roundabout Location	Status (as of Feb. 2026)	Funded Construction Date
NW 179th St / NW 11th Ave	Not constructed	Not in current TIP
NW 179th St / ~NW 6th Ave	Not constructed	Not in current TIP
NE 179th St / ~NE 2nd Ave	Not constructed	Not in current TIP
NE 179th St / NE Delfel Road (realigned)	Not constructed	2028 (TIP)
I-5 SB Ramps / NE 179th St	Not constructed (WSDOT)	2029–2031 (WSDOT)

Note: Approximate cross-street locations (~NW 6th, ~NE 2nd) are estimated from the circulation plan maps; exact street names are not identified in plan documents. The I-5 SB ramp roundabout is part of the WSDOT interchange project.

East Side: I-5 to NE 50th Avenue (8 roundabouts)

Roundabout Location	Status (as of Feb. 2026)	Funded Construction Date
I-5 NB Ramps / NE 179th St	Not constructed (WSDOT)	2029–2031 (WSDOT)

NE 179th St / ~NE 12th Ave	Not constructed	2028–2029 (TIP)
NE 179th St / NE 15th Ave (NE 10th Ave relocated here)	Not constructed	2028–2029 (TIP)
NE 179th St / ~NE 23rd Ave	Not constructed	Not in current TIP
NE 179th St / NE 29th Ave	Under construction	Completion ~2027
NE 179th St / ~NE 37th Ave	Not constructed	Developer-built, no date
NE 179th St / NE Mill Creek Ave (relocated from NE 45th)	Not constructed	Developer-built, no date
NE 179th St / NE 50th Ave	Interim left-turn lanes only	Post-2030 (not funded)

Note: Approximate cross-street locations (~NE 12th, ~NE 23rd, ~NE 37th) are estimated from the circulation plan maps; exact street names are not identified in plan documents. The I-5 NB ramp roundabout is part of the WSDOT interchange project.

Sources: 179th Street Access Management and Circulation Plan maps (3 pages), July 18, 2023 Council hearing; WSDOT I-5/179th St Interchange project; RTC 2026-2029 TIP; DEAB September 4, 2025 meeting.

The planned roundabout density along NE/NW 179th Street is notable. Between NW 11th Avenue and NE 50th Avenue—a distance of approximately 3.5 miles—the plan calls for approximately 13 roundabouts. On the east side alone, 8 roundabouts are planned over approximately 2.2 miles (I-5 to NE 50th Avenue), translating to roughly one roundabout every 1,450 feet. On the west side, 5 roundabouts are planned over approximately 1.3 miles (NW 11th to I-5), or roughly one every 1,370 feet.

Single-lane roundabouts typically process 1,000 to 1,300 vehicles per hour on the main approach and operate with design speeds of 15-25 mph through the circular portion. Multi-lane roundabouts can handle higher throughput but still require traffic to decelerate, yield, navigate the circle, and accelerate on exit. The cumulative effect of encountering a roundabout this frequently on a corridor projected to serve 4,815 housing units and 2,850 jobs at full build-out (per the E.D. Hovee & Company Economic Feasibility Study, November 2018) raises a question about achievable corridor travel speeds.

The 179th Street corridor is designated with a minimum travel speed standard of 13 mph over 2.20 miles (I-5 to NE 50th Avenue), equating to a maximum travel time of 10.20 minutes. With 8 roundabouts over this distance, traffic may technically "flow" in that vehicles are moving rather than stopped at signals, but at sustained low speeds. Whether this level of service was the intended design outcome is a question for Council and Public Works to address. What can be stated factually is that the traffic studies model several of these roundabouts as already constructed when they are not, which means the modeled intersection operations do not reflect current conditions.

6. Cross-Study Confirmation: The Pattern Appears in Multiple Traffic Studies

The road classification issue is not limited to a single traffic study. Staff reports for multiple developments in the corridor document the same pattern. The Three Creeks East staff report (PLD-2025-00077) states that NE 179th Street is classified as a "Principal Arterial (Pr-4cb)" while simultaneously noting that the road "has no raised medians from NE Delfel Road to NE 50th Avenue with numerous private driveways that provide residential access to the principal arterial." The Four Creeks North staff report (PLD-2025-00040) similarly classifies NE 29th Avenue as a "Minor Arterial - 4 lanes w/CLT & bike lanes" (M-4cb, capacity 1,800 veh/hr) while acknowledging it "has no raised medians from NE 179th Street to NE 199th Street with numerous private driveways."

NE 29th Avenue between NE 179th Street and NE 189th Street is particularly instructive. It is classified as M-4cb in the arterial atlas, assigning it 1,800 vehicles per hour capacity. However, the Four Creeks North staff report describes a road with no raised medians, numerous private driveways, and partial sidewalks. There is no funded project in the current TIP to widen NE 29th Avenue to four lanes. The road exists as a two-lane facility. Yet concurrency analysis credits it with four-lane capacity because that is what the atlas classification dictates.

The Kozy Manor Estates staff report (PLD-2025-00014) also references NE 179th Street as Pr-4cb and NE 37th Avenue as C-2b, noting both are "regulated by the County's Concurrency Ordinance/Code (CCC 40.350.020)." The concurrency analysis for each of these developments was conducted using atlas-classified capacity, not actual road capacity.

7. Implications for Transportation Concurrency Compliance

The arterial atlas update accomplished its stated goal of providing a planned road network framework. However, when atlas classifications are used directly as capacity inputs for concurrency determinations, the system assumes the planned network is already built. This creates a structural gap between the transportation capacity that exists and the capacity credited in development approvals.

Specifically:

Roads classified as 4-lane arterials that are currently 2-lane: NE 179th Street from I-5 to NE 50th Avenue is classified Pr-4cb (1,800 veh/hr capacity) but exists as a two-lane road for most of its length east of I-5. The 2021 Existing Conditions memorandum documents this as 2 (1/1) lanes from Union Road to 50th Avenue. Even the NE 174th Street Subdivision traffic study, while using 1,800 veh/hr capacity, shows v/c ratios of 1.047 and 1.149 on segments near the

interchange. If actual 2-lane capacity (~600-800 veh/hr) were used, these ratios would indicate complete gridlock.

Roads with no improvement plans assigned built-out capacity: NE 29th Avenue between NE 179th Street and NE 189th Street is classified M-4cb (1,800 veh/hr) but has no funded widening project. NE 72nd Avenue is classified Pr-4cb but exists as a two-lane road with no curbs, no sidewalks, and no bike lanes. NE 199th Street west of NE 10th Avenue has similar gaps between classification and condition.

Intersections modeled as roundabouts that are currently stop-controlled: The NE 174th Street Subdivision traffic study models several intersections in year 2028 conditions as completed roundabouts. NE 179th Street at NE 29th Avenue (under construction, not complete until 2027); NE 179th Street at NE 15th Avenue (construction estimated 2028-2029); NE 179th Street at NE 50th Avenue (interim left-turn lanes installed; full roundabout unfunded, post-2030); and the I-5 interchange ramps (WSDOT project, construction 2029-2031). As of this writing, only the NE 29th Avenue roundabout is under active construction.

8. Why No Development Application Can Be Denied: The Interlocking Approval System

The preceding sections document individual issues with how the concurrency system operates. This section identifies a more fundamental problem: when the arterial atlas classifications, the tiered distance requirements, the TIP credit provision, and the mitigation threshold are considered together as a system, they create a structure in which it is effectively impossible to deny a development application on concurrency grounds—regardless of actual road conditions.

The four interlocking mechanisms:

Mechanism 1 — Inflated Capacity (Arterial Atlas): As documented in Sections 2–4, the arterial atlas assigns built-out capacity to roads that have not been built to their classified standard. A two-lane road classified as Pr-4cb receives 1,800 vehicles per hour in the v/c calculation rather than its actual capacity of 600–800 vehicles per hour. This doubles or triples the denominator in every capacity ratio, making it far harder for any segment to show a v/c ratio exceeding the 0.90 threshold. The effect is that most road segments will appear to have adequate capacity even when they are functionally at or over their actual limits.

Mechanism 2 — Limited Study Area (Tiered Distance Requirements): Clark County Code 40.350.020 limits the geographic scope of traffic studies based on trip generation. Developments generating 50 or fewer peak trips need only analyze intersections within 1 mile. Developments generating 51–250 trips extend to 2 miles, and only those generating 251 or

more trips must look 3 miles out. Most residential subdivisions in the corridor generate under 250 peak trips. This means the worst-performing intersections and segments—which may be just beyond the study radius—are never evaluated for that development. A subdivision near NE 50th Avenue, for example, may never have to analyze the NE 179th/I-5 interchange intersections that are already failing.

Mechanism 3 — Paper Cure for Failures (TIP Credit Provision): Clark County Code 40.350.020(F)(6) provides that when an intersection or road segment is on the County's six-year Transportation Improvement Program, the scheduled improvements "can be considered in place and operational" for concurrency purposes. This means that even if a traffic study does identify a failing intersection within its study area, the failure is cured on paper if there is a TIP project for that location—regardless of whether the project has full construction funding, regardless of whether construction has begun, and regardless of whether the project is actually scheduled to be complete before the development generates traffic. The Three Creeks East staff report explicitly invokes this provision for both the NE 179th/NE 50th Avenue intersection (LOS F, roundabout unfunded until post-2030) and the NE 179th/NE Delfel Road intersection (LOS F, roundabout scheduled for 2028).

Mechanism 4 — High Threshold for Mitigation (5-Trip / Worsening Rule): Even when all three preceding mechanisms fail to prevent a failure from appearing in the analysis—i.e., a segment exceeds 0.90 v/c using inflated capacity, the failing location is within the study radius, and there is no TIP project to credit—Clark County Code 40.350.020(G)(1)(c) still provides that the development "shall not be required to mitigate" unless it adds at least 5 peak period trips to the failing approach AND the worst movement on that failing approach is worsened by the development. For most individual subdivisions, the trip distribution across multiple approaches means fewer than 5 trips reach any single failing approach. The result is that even documented failures do not trigger denial or mitigation requirements.

The combined effect:

Each mechanism independently creates substantial slack in the concurrency system. Working together, they form a sequence of filters that progressively eliminates the possibility of denial:

Step 1: Does the road segment show $v/c > 0.90$? Usually no—because the atlas classification inflates the capacity denominator. **Most applications pass here.**

Step 2: If a segment does exceed 0.90 v/c, is it within the development's study radius? Often no—because the tiered distance limits exclude distant intersections. **Applications that reached Step 2 often pass here.**

Step 3: If a failing segment is within the study radius, is there a TIP project for it? Usually yes—because the County has placed most corridor intersections on the TIP, even if only for preliminary engineering. **Applications that reached Step 3 almost always pass here.**

Step 4: If a failure survives all three filters, does the development add 5+ peak trips to the failing approach and worsen the worst movement? Rarely—because trip distribution spreads impacts across multiple approaches. **Even applications that reached Step 4 typically pass here.**

The practical outcome is that no individual development application in the 179th Street corridor can be denied on concurrency grounds under the current system. Each application is evaluated in isolation, and the four mechanisms ensure it will pass. Meanwhile, the cumulative effect of all approved developments continues to add traffic to roads that are already over their actual capacity. The system evaluates each straw individually but never weighs the camel's load.

This is a structural problem, not a staff problem. County staff are applying the code as written. The code's mechanisms, combined with the atlas classifications, produce a system that cannot say no. If Council intended the concurrency system to function as a genuine check on development that outpaces infrastructure, the interaction of these four provisions defeats that intent. If Council intended the concurrency system to operate as it currently does, then the system is functioning as designed—but Council and the public should understand that concurrency review in the 179th Street corridor is not a constraint on development; it is a procedural step that all applications will pass.

9. Questions This Analysis Raises

The evidence presented in this analysis raises fundamental questions about whether the 179th Street corridor's concurrency system is performing the function required by the Growth Management Act. If the answers to these questions confirm what the data suggests—that the system cannot deny any application—then a development moratorium is not merely warranted but necessary to fulfill the GMA's concurrency mandate.

1. When the arterial atlas amendments were adopted in July 2023, was Council informed that the classifications would be used to determine road capacity for concurrency purposes—even for roads not yet built to their classified standard? If not, Council approved a planning document without understanding it would simultaneously disable the concurrency system's ability to detect infrastructure deficiencies.
2. Was a cumulative impact analysis performed to determine the total development capacity that could be approved under the updated atlas classifications before the classified roads are

actually constructed? The absence of such an analysis means the County has no way to know how much development the actual road network can support—which is precisely the determination the GMA requires.

3. Clark County Code 40.350.020 states that "the proposed development is not required to mitigate impacts" unless it adds at least 5 peak period trips to a failing approach AND worsens the worst movement. How many individual developments can be approved under this threshold before the cumulative impact overwhelms the actual road capacity? The fact that no one can answer this question demonstrates that the system is not tracking cumulative impacts—a core GMA requirement.

4. Given that the minimum travel speed standard for the 179th Street corridor is 13 mph, and the corridor is planned with approximately 13 roundabouts over 3.5 miles, was a corridor travel speed analysis performed to determine whether the planned network can meet the adopted standard at projected build-out volumes? If not, the County is approving development against a travel speed standard it has never validated.

5. Has any development application in the 179th Street corridor ever been denied concurrency approval? If the answer is no—and the analysis in Section 8 explains why the answer must be no—then the concurrency system is not functioning as a check on development. It is a procedural formality that every application passes. A moratorium is the only mechanism available to perform the function the concurrency system cannot.

6. If road segments are already exceeding 0.90 v/c under atlas-classified capacity (as documented in Section 4), what is the projected timeline for the improvements needed to bring those segments to their classified standard? Until those improvements are complete, every additional development approval widens the gap between credited and actual capacity—a gap that a moratorium would prevent from growing further.

7. Should the County implement an interim policy requiring traffic studies to evaluate concurrency using both atlas-classified capacity and actual existing road capacity? A dual-reporting requirement would, at minimum, allow Council and the public to see the magnitude of the capacity gap. But reporting alone does not stop approvals—only a moratorium does that.

10. Conclusion

This analysis has demonstrated that Clark County's transportation concurrency system in the 179th Street corridor is structurally incapable of denying development applications. Four interlocking mechanisms—inflated atlas capacity, limited study radii, TIP credits for unbuilt improvements, and high mitigation thresholds—work in sequence to filter out every possible

basis for denial. The result is that concurrency review functions as a procedural checkpoint that all applications pass, not as the infrastructure adequacy safeguard required by the Growth Management Act.

This finding is not speculative. Traffic studies for currently pending development applications already document LOS F conditions at corridor intersections. Those failures are visible in the applicants' own data. Yet every application passes concurrency review because the code's interlocking provisions ensure that documented failures never trigger denial or meaningful mitigation. Each individual straw is evaluated and found acceptable; the system has no mechanism to weigh the camel's load.

The arterial atlas update of July 2023 was the catalyst that transformed the concurrency system from a potentially functional constraint into one that cannot constrain. By assigning built-out classifications to unbuilt roads, the atlas inflated the capacity denominator in every v/c calculation across the corridor. Combined with the TIP credit provision, the tiered distance limits, and the 5-trip threshold, the effect is a system that would require catastrophic, corridor-wide failure—visible even through the inflated capacity lens—before a single application could be denied. That level of failure would represent a public safety emergency, not a planning decision.

This analysis reinforces and extends the case for a development moratorium in the 179th Street corridor. The prior position—that the County lifted urban holding designations before infrastructure was in place and that the corridor faces concurrency violations across transportation, stormwater, schools, parks, water, and sewer systems—is now supplemented by evidence that the regulatory system designed to prevent exactly this outcome has been rendered nonfunctional. When the concurrency system cannot say no, a moratorium is the only remaining tool to ensure that infrastructure keeps pace with development as the GMA requires.

The question before Council is not whether the concurrency system is working as the code directs—it is. The question is whether the outcomes it produces—approving every application while roads operate beyond their actual capacity—are the outcomes Council intended when it adopted the arterial atlas amendments and the concurrency code. If they are not, a moratorium provides the time and space to realign the system with its intended purpose before additional development approvals deepen the infrastructure deficit.

Sources

- [1] Clark County Code Section 40.350.020, Transportation Concurrency Management System.
- [2] 179th Street Circulation and Access Management Plan, Existing and Planned Conditions Memorandum, October 2021.
- [3] NE 174th Street Subdivision Transportation Impact Study (PAC-2025-00047), Lancaster Mobley, December 4, 2025.
- [4] Clark County Council Hearing, July 18, 2023, CPZ-2021-00013, Supporting Documents and Presentation.
- [5] Clark County Council Hearing, July 18, 2023, Verbatim Minutes (Ken Lader presentation).
- [6] Three Creeks East Staff Report and Recommendation (PLD-2025-00077), January 7, 2026.
- [7] Three Creeks East Transportation Impact Study, Lancaster Mobley, June 24, 2025.
- [8] Four Creeks North Staff Report and Recommendation (PLD-2025-00040), December 23, 2025.
- [9] Four Creeks North Transportation Impact Study, April 18, 2025.
- [10] Kozy Manor Estates Staff Report and Recommendation (PLD-2025-00014), January 7, 2026.
- [11] Kozy Manor Estates Transportation Impact Analysis, Kittelson & Associates, February 2025.
- [12] Ridgefield School District Middle School Transportation Impact Analysis, Kittelson & Associates, June 2024.
- [13] RTC 2026-2029 Transportation Improvement Program, Appendix H STIP Detail Sheets.
- [14] DEAB September 4, 2025 Meeting, TIP Presentation by John McSherry.
- [15] Clark County Planning Commission Recommendation, February 17, 2022 (CPZ-2021-00013).
- [16] E.D. Hovee & Company, Economic Feasibility Study for I-5/179th Interchange Area Development, November 2018.
- [17] Level of Service Analysis Based on Recent Traffic Studies, January 2026 (compiled from sources [3], [7], [9], [11], [12]).

ARTERIAL ATLAS RECLASSIFICATION AND TRANSPORTATION CONCURRENCY:

Why the 2025 Comprehensive Plan Must Not Increase Density in the NE 179th Street Corridor

*Submitted for the Record: Clark County 2025 Comprehensive Plan Periodic Review
March 1, 2026*

Purpose of This Summary

This document summarizes how Clark County's July 2023 Arterial Atlas reclassification of NE 179th Street created a structurally defective transportation concurrency system that cannot function as required by Washington's Growth Management Act (GMA), RCW 36.70A.070. The 2025 Comprehensive Plan periodic review presents the County with an opportunity to correct these deficiencies. Instead, the County proposes to increase density in a corridor where the existing concurrency system already fails to protect public health, safety, and welfare. This document and the accompanying analysis is submitted for the record of the 2025 Comprehensive Plan periodic review.

1. The Arterial Atlas Reclassification Created 'Paper Concurrency'

In July 2023, Clark County adopted the Arterial Atlas amendments reclassifying NE 179th Street as a Principal Arterial (Pr-4cb) — a four-lane urban arterial with curbs and bike lanes — and simultaneously adopted the 179th Street Access Management and Circulation Plan. The amendments had been initiated on the 2021 work plan (CPZ-2021-00013) and recommended by the Planning Commission in February 2022, but did not become legally effective until Council adoption in July 2023. The corridor was reclassified to its planned, fully-built-out condition, not its existing condition.

What the Reclassification Did

- Assigned four-lane capacity to a road that remains two lanes with no curbs, no bike lanes, and numerous private driveways for most of its length.
- Adopted planned future roundabout intersections (13 total) as the basis for intersection capacity calculations — before any roundabouts were built.
- Enabled subsequent traffic studies to treat planned-but-unbuilt improvements as "in place and operational" pursuant to CCC 40.350.020(F)(6), the TIP credit provision.
- Created the legal predicate for development approval in the corridor, despite the road remaining functionally unimproved.

Road Segment / Feature	Atlas Classification (Planned)	Actual Existing Condition
NE 179th St (NW 11th – NE 50th Ave)	Pr-4cb: 4 lanes, center turn lane or median, bike lanes	2 lanes, no CTL, no bike lanes, private driveways throughout
NE 29th Ave roundabout	Full roundabout (credited in studies)	Under construction; 2-year closure Aug 2025 – Aug 2027
NE 50th Ave roundabout	Full roundabout (credited in studies)	Not funded; 2035 or later per RTC presentation (B. Muhu)

I-5 / 179th Interchange	Reconstructed interchange (credited)	WSDOT project; subject to timing and availability of state funds; earliest completion 2031
NE 179th St (NE 29th – NE 50th)	4-lane widened arterial (credited)	NOT on Reasonably Funded Project List; scheduled 2031–2033

2. The Four Interlocking Mechanisms That Make Denial Impossible

The arterial atlas reclassification does not operate in isolation. It is one of four interlocking mechanisms that together make it structurally impossible for Clark County to deny any development application on concurrency grounds in the 179th Street corridor:

#	Mechanism	Effect on Concurrency Review
1	Inflated Arterial Atlas Classification	Roads assigned planned-buildout capacity. Studies use 4-lane capacity for 2-lane roads, making every corridor appear to have room for growth.
2	Tiered Study Area Limits	Projects generating fewer than 251 peak-hour trips need only analyze a 3-mile radius. The I-5 interchange — the only outlet for the entire corridor — falls outside most study areas.
3	TIP Credit Provision (CCC 40.350.020(F)(6))	Any improvement scheduled in the County's TIP is treated as already complete for concurrency purposes — even when not funded, not designed, and 7–12 years from construction.
4	High Mitigation Threshold / No Denial Authority	Staff reports consistently find 'compliance' even when v/c ratios exceed 1.0, by reclassifying corridor failures as 'intersection-level' results that individually pass — a logical contradiction.

3. Why This Is a 2025 Comprehensive Plan Issue

The arterial atlas concurrency failure is not simply a project-level development review problem — it is a systemic error in the County's transportation concurrency management system that must be addressed in the Comprehensive Plan itself.

3.1 The Comp Plan Cannot Rely on a Road System That Does Not Exist

RCW 36.70A.070(6)(b) requires that the Comprehensive Plan's capital facilities element identify funding sources sufficient to maintain adopted level of service standards. That requirement is not met in the 179th Street corridor. The concurrency system approving development today is not based on roads that exist — it is based on roads, intersections, and interchange configurations that are years or decades from completion and, in critical cases, not yet funded at all.

This is not a problem isolated to one segment. Multiple roads serving the corridor — including NE 29th Avenue, NE 199th Street, NE 10th Avenue, NE Delfel Road, and NE 15th Avenue — are assigned built-out urban arterial capacity in concurrency analyses despite lacking center turn lanes or medians, bike lanes, lane widths, or intersection improvements. Traffic studies submitted for Three Creeks East, Four Creeks North, and Kozy Manor Estates all document the same pattern: roadway segments

carrying current traffic loads are evaluated as if full build-out improvements are already in place. The result is that corridor-wide deficiencies are systematically understated across every project review.

The 2025 Comprehensive Plan periodic review is the appropriate moment to correct the foundational classification error. Increasing density before doing so compounds the problem by adding trip generation to a network modeled on phantom capacity.

3.2 Each Development Gets a 6-Year Concurrency Window — But the Clock Runs on Roads That Don't Exist

Under CCC 40.350.020, each development approval is granted a six-year concurrency window — a period within which required transportation improvements must be in place. Clark County uses this window to justify approving development today based on TIP-scheduled improvements projected years into the future. But the window is measured against a baseline that is itself fictitious: the arterial atlas classifications and TIP credits mean the “improvements” being relied upon were never completed in the first place. The concurrency system is granting six-year windows on top of capacity that exists only on paper.

In *Achen et al. v. Clark County*, Case No. 95-2-0011 (1995), the Growth Management Hearings Board ordered Clark County to halt development approvals until infrastructure was ‘reasonably funded and scheduled.’ The County’s current practice replicates this violation in two compounding ways: first, by treating TIP-listed improvements as capacity that exists today regardless of funding status; and second, by crediting arterial atlas classifications that assign urban build-out capacity to roads that remain unimproved two-lane corridors. Together, these practices mean that concurrency approvals in the 179th Street corridor since July 2023 have been issued against a road system that does not exist — and that the County has no funded plan to fully build within any near-term horizon.

The Washington State Supreme Court’s ruling in *Kittitas County Conservation v. Kittitas County*, 172 Wn.2d 144 (2011), adds three critical dimensions to this analysis. First, the Court held that county discretion in planning decisions is “bounded by the goals and requirements of the GMA” — a county cannot rely on a presumption of validity when evidence of failure is in the record. Second, the Court established that transportation concurrency is an *enforcement duty*, not merely a policy aspiration — the concurrency code must operate as a genuine hard stop on development when capacity is exceeded, not a system that recharacterizes failures as acceptable through methodological workarounds. Third, and directly applicable here, *Kittitas* requires that cumulative impacts across all development be assessed, not evaluated project by project in isolation. Clark County’s tiered study area limits and project-level concurrency reviews are precisely the kind of piecemeal analysis that *Kittitas* prohibits — each project individually appears to pass while the corridor collectively fails.

3.3 Proposed Density Increases Would Compound the Violation

The County’s 2025 Comp Plan proposals include additional upzoning in the 179th Street corridor. Approving increased density when the foundational concurrency infrastructure remains unfunded and unbuilt compounds an existing GMA violation. These approvals are inconsistent with the GMA’s concurrency mandate and the County’s own adopted level of service standards.

4. Requested Actions

This summary and the attached Arterial Atlas Concurrency Analysis are submitted in support of the following requested actions:

- Denial of any Comp Plan amendments that increase density in the 179th Street corridor until all required transportation infrastructure appears on the Reasonably Funded Project List with realistic completion schedules.
- Correction of the transportation concurrency management system to eliminate credit for improvements that are not funded, not designed, and more than six years from construction.

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- Recalibration of arterial atlas classifications to reflect existing conditions rather than planned build-out conditions, for use in concurrency analysis.
 - Expansion of required traffic study areas to ensure the I-5/179th interchange is always analyzed for any development generating trips on the 179th Street corridor.
 - A finding in the Comprehensive Plan record that the existing concurrency system does not satisfy RCW 36.70A.070 and that corrective action is required as part of the 2025 periodic review.

This document is entered into the public record of Clark County's 2025 Comprehensive Plan periodic review. The County's failure to correct these systemic concurrency deficiencies during this periodic review is inconsistent with RCW 36.70A.070 and the requirements established in *RCW 36.70A.280*; *Achen et al. v. Clark County*, Case No. 95-2-0011 (1995); *Kittitas County Conservation v. Kittitas County*, 172 Wn.2d 144 (2011).