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**To:** [hcpheidi@yahoo.com](mailto:hcpheidi@yahoo.com)  
**Cc:** [Harrison Husting](#); [Jose Alvarez](#)  
**Subject:** FW: Multimodal comments for Planning Committee work session  
**Date:** Monday, April 13, 2026 8:10:00 AM  
**Attachments:** [PC Comments MMLoS\\_041626.pdf](#)

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Good day, Heidi,

Thank you for providing this feedback related to the Multimodal Level of Service Update to be discussed at the Apr. 16th Planning Commission Work Session.

I am forwarding to additional members of Staff, and your comments will be forwarded to the members of the Planning Commission and added to the Comprehensive Plan Index of Record.

Best,

Jeff Delapena  
Program Assistant  
COMMUNITY PLANNING

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-----Original Message-----

From: Heidi Pozzo <[hcpheidi@yahoo.com](mailto:hcpheidi@yahoo.com)>  
Sent: Sunday, April 12, 2026 5:44 PM  
To: Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
Subject: Multimodal comments for Planning Committee work session

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Jeffrey,

Please find attached comments for the Planning Commission work session on multimodal transportation. Would you please forward to the Planning Commission and include in the Comp Plan record?

Thank you,

Heidi

# **Written Comments to the Clark County Planning Commission Comprehensive Plan Update: Transportation Element**

Multimodal Level of Service, Active Transportation Network, and Concurrency  
April 16, 2026 Work Session

## **Introduction**

I am submitting these written comments in advance of the Planning Commission work session on the Transportation Element, including the Transportation Overview, Multi-Modal LOS Update, and ADA Transition Plan Update. While I understand that public comment is not taken at work sessions, I respectfully request that these concerns and questions be provided to the Planning Commission members and included in the record.

These comments are informed by my extensive review of the DEIS transportation analysis, the model output files obtained through public records request PDR P055026-031026, Harrison Husting's March 24, 2026 staff report on the Proposed Active Transportation Network, the City of Vancouver's January 2026 Transportation Concurrency Management Administrative Manual, the requirements of HB 1181 as codified in RCW 36.70A.070(6), and the transportation impact studies and staff reports for development applications currently in review within the NE 179th Street corridor.

## **A. The DEIS Transportation Analysis Did Not Evaluate Multimodal Transportation**

HB 1181 amended the Growth Management Act to require multimodal level of service standards for all locally owned arterials, transit routes serving urban growth areas, and active transportation facilities. The Transportation Element must include forecasts of multimodal transportation demand and needs, and priority must be given to facilities providing the greatest multimodal safety benefit.

The DEIS transportation analysis (Section 3.9) was conducted entirely with auto-centric metrics: vehicle volume-to-capacity ratios, vehicle miles traveled, vehicle hours of delay, and vehicle hours of travel. No bicycle level of service, pedestrian level of service, or transit level of service was evaluated at the corridor level. Multimodal LOS was on the original data request list prepared by Jenna Kay in February 2024 but was removed by the DEIS transportation consultant, who classified it as "a policy decision."

The DEIS identified significant stress on the transportation system under all three alternatives using these auto-centric metrics alone. The alternatives analysis that will inform the Council's selection of a preferred alternative was therefore conducted without the multimodal analysis that state law now requires for the Transportation Element. DKS Associates is now being engaged to perform this work after the fact. The Council is scheduled to select a preferred alternative on April 27 or 28, 2026—before the multimodal analysis is complete. The multimodal analysis will presumably be captured

in the Final EIS, but by that point the preferred alternative will already have been selected based on incomplete information.

- How will the multimodal LOS analysis being performed by DKS Associates be reconciled with the DEIS transportation analysis, which used only auto metrics? If the DKS analysis identifies deficiencies not captured in the DEIS, will the Final EIS reflect those deficiencies, and will the Council have the opportunity to reconsider its preferred alternative selection in light of the new analysis?
- The DEIS evaluated three land use alternatives using only vehicle-based metrics and already identified significant transportation system stress. Is it possible that a multimodal analysis would produce different conclusions about which alternative performs best? If so, shouldn't the multimodal analysis be completed before an alternative is selected?
- Given that the Council is scheduled to select a preferred alternative on April 27 or 28 without the multimodal analysis, what mechanism exists to ensure the Final EIS adequately addresses multimodal deficiencies that may affect the viability of the selected alternative?

## **B. Practical Application of Multimodal LOS in Areas Without Adequate Multimodal Infrastructure**

The proposed two-tier MMLOS framework applies LTS 2 within the Vancouver Urban Growth Area and LTS 3 in rural areas. While a tiered approach is reasonable in concept, I have significant concerns about how it will function in practice in areas where multimodal infrastructure is absent or inadequate.

The NE 179th Street corridor and the broader transportation network feeding it encompass a range of road conditions, none of which currently meet the proposed multimodal LOS standards. The conditions vary significantly by area:

**Rural roads.** Many of the roads in this area remain rural two-lane facilities with no sidewalks, no street lights, no bike lanes, and in many locations, insufficient pavement width for even standard bike lanes, let alone buffered or protected facilities. The December 2025 transportation impact study for the NE 174th Street Subdivision documents the existing conditions of key roads in this network: NE 10th Avenue (50 mph, no curbs, no sidewalks, no bike lanes), NE 72nd Avenue (50 mph, no curbs, no sidewalks, no bike lanes), NE 50th Avenue (40–50 mph, partial sidewalks only, no bike lanes), and NE 159th Street (40 mph, no curbs, no sidewalks, no bike lanes). NE 179th Street itself has partial sidewalks on both sides in some segments but no bike lanes, with posted speeds of 40–50 mph. These roads would score LTS 4 under any objective assessment—the worst possible rating—for both bicycle and pedestrian travel.

**Salmon Creek commercial area.** In the more developed Salmon Creek area along NE 134th Street, the roads are built to urban standards with curbs and travel lanes. However, sidewalks are partial in many locations, and where bike lanes exist, they are standard painted lanes without buffers or physical protection. At prevailing speeds of 35

mph and the traffic volumes carried by NE 134th Street and the connecting arterials, painted bike lanes do not meet LTS 2. These facilities would need to be upgraded to buffered or protected lanes to satisfy the proposed MMLOS standard within the UGA.

**Transit.** C-TRAN service in this area is limited. There is no fixed-route transit service on NE 179th Street or on any of the connecting north-south roads between approximately NE 134th Street and NE 199th Street. In the Salmon Creek commercial area, limited fixed-route service is available with infrequent stops near Legacy Salmon Creek Medical Center, WSU Vancouver, Kaiser Permanente, and the Salmon Creek Park and Ride. C-TRAN's Dial-a-Ride provides on-demand service within the area for those who qualify. For the vast majority of the corridor, transit LOS is effectively zero. Even in the Salmon Creek area where some service exists, the frequency and coverage do not support a meaningful transit mode share for concurrency purposes.

**Practical connectivity.** The planned NE 179th Street corridor improvements, if completed on schedule over the next five to six years, will include shared bicycle and pedestrian paths along an approximately 2.5-mile stretch. However, the path will connect at one end to rural roads that have no multimodal facilities and to partially improved road at the other end—or, in the Salmon Creek direction, to roads with a mix of sidewalks or painted bike lanes on one side or painted bike lane with sidewalk on the other. Building a 2.5-mile segment of shared-use path does not create a functional multimodal network if there is nowhere safe to walk or bike to at either end. It is not practical to assume that residents will walk or bike miles to a grocery store, medical office, or school through rural roads with no sidewalks, no shoulders, and 50 mph speed limits—or through commercial corridors where the bike and pedestrian facilities are inconsistent. Multimodal LOS standards that assume these trips will occur are crediting capacity that does not reflect how people actually travel in this area.

Harrison Husting's March 2026 staff report on the Proposed Active Transportation Network recommends reducing assumed future speed limits to 30 mph or below on several roads in this area, including NE 10th Avenue from NE Ternery Road to NE 179th Street. The purpose of the assumed speed reduction is to avoid the capital cost of protected bike lanes that would otherwise be required under the LTS methodology. However, the physical road width in many of these locations does not accommodate buffered bike lanes even at the lower speed threshold.

- For roads like NE 10th Avenue that currently have no bike lanes, no sidewalks, and insufficient width for buffered facilities in some places, and sidewalks and painted bike lanes in others, what specific improvements are assumed in order to achieve LTS 2 in the VUGA and LTS 3 in the rural area? What is the estimated cost, and what is the funding source?
- For roads in the Salmon Creek commercial area that have painted bike lanes but not buffered or protected facilities, what improvements are needed to achieve LTS 2? Has the cost of upgrading these facilities been estimated?
- The staff report proposes assumed future speed limits of 30 mph or below on NE 10th Avenue and other urban collectors. What is the timeline for implementing

these speed reductions? Will they be adopted before or after the Comprehensive Plan is finalized?

- On a two-lane road without shoulders, how does the County propose to add bike lanes without either widening the road or removing a vehicle travel lane? If widening is required, has right-of-way acquisition been evaluated and costed?
- The NE 179th Street corridor improvements will create shared-use paths that connect to roads with no multimodal facilities. How does the County account for the lack of network connectivity when assessing multimodal LOS? Does a shared-use path that terminates at a 50 mph rural road with no sidewalks provide meaningful multimodal capacity?
- The staff report acknowledges that full implementation of the active transportation network will extend beyond the 20-year planning horizon. If a road fails to meet the minimum MMLOS standard today and the improvement is not funded within the planning horizon, what is the concurrency status of that corridor for new development?

### **C. Conflict Between Transportation Model Assumptions and Active Transportation Plans**

The DEIS transportation model assigns significant vehicle traffic volumes to roads in the 179th Street corridor area. Simultaneously, the Proposed Active Transportation Network assumes speed reductions and bicycle facilities on those same roads. These assumptions appear to be in direct conflict.

The model includes links in the 179th corridor that carry over 30,000 daily vehicles combined. These volumes depend on interchange-area connections that are part of the I-5/179th Street interchange reconstruction project. The active transportation plan, meanwhile, proposes 30 mph speed limits and bike facilities on roads in the same area. Heavy vehicle volumes at 30 mph on single-lane facilities would produce significant congestion and delay, likely pushing traffic onto other routes—yet the transportation model does not reflect speed reductions or capacity reductions from multimodal facility additions.

- Has the transportation model been run with the speed assumptions from the active transportation plan? If a corridor is assumed to operate at 30 mph with bike lanes, do the model's vehicle capacity and delay calculations reflect that configuration?
- If adding bike facilities requires reducing vehicle capacity (through narrower lanes, speed reductions, or lane removal), how are those capacity reductions reflected in the concurrency analysis for new development?
- How does the County reconcile the transportation model's assumption of high vehicle volumes on corridor roads with the active transportation plan's assumption of slower speeds and bike facilities on those same roads?

## **D. Concurrency Framework for Multimodal LOS**

Under the current concurrency program, development is evaluated against vehicle-based level of service standards. HB 1181's requirement for multimodal LOS standards raises fundamental questions about how concurrency will be administered going forward.

The City of Vancouver's January 2026 Concurrency Administrative Manual provides one model. Vancouver has established a "Category 4" framework for corridors built to ultimate capacity, where concurrency evaluation shifts from vehicle speed to person-trip capacity by mode—walk, bike, vehicle, and transit. This approach works in an urban environment with existing multimodal infrastructure and transit service.

For unincorporated Clark County—particularly areas like the 179th Street corridor where the multimodal infrastructure ranges from nonexistent to inadequate—the question is how multimodal concurrency can function. If the bicycle and pedestrian person-trip capacity of a corridor is effectively zero because there are no facilities or because the facilities that exist do not meet the minimum LTS standard, and transit capacity is zero or negligible because service is either absent or limited to infrequent stops in a few locations, then multimodal person-trip capacity equals vehicle capacity, and the framework provides no additional capacity beyond what exists today.

### **Current Corridor Conditions Demonstrate the Stakes of This Transition**

On April 8, 2026, the County issued a staff report for the 174th Street Subdivision (PLD-2026-00002), a proposed 100-lot subdivision located at 17101 NE 40th Avenue within the NE 179th Street corridor. The staff report states: "At the time of this staff report mailing Concurrency Standards have not been met, therefore the recommendation for Concurrency is denial." The concurrency staff report supporting this recommendation is expected later this week; a public hearing before the Hearing Examiner is scheduled for April 23, 2026.

This recommendation is significant because it reflects increased scrutiny of concurrency in the NE 179th Street corridor. The 174th Street Subdivision's transportation impact study, prepared by Lancaster Mobley and dated December 4, 2025, identified multiple roadway segments exceeding the County's 0.90 volume-to-capacity ratio threshold under 2028 conditions, including segments of NE 179th Street, NE 10th Avenue, NE 50th Avenue, and NE 15th Avenue. It also identified two failing intersections: NE 179th Street at NE 50th Avenue and NE 159th Street at NE 72nd Avenue.

These are the same corridor segments and intersections that have been documented as failing in the traffic studies commissioned by the developers of Three Creeks East, Four Creeks North, and Kozy Manor Estates—all of which were approved using the determination that corridor V/C exceedances did not represent roadway deficiencies because bounding intersection LOS was acceptable. The relevant boilerplate language from those staff reports stated that "corridor mobility facilitated with good intersection LOS" justified the exceedances. The 174th Street Subdivision denial recommendation indicates that the County is now applying greater scrutiny to concurrency in this corridor.

The planning implications for the multimodal LOS transition are direct. If the current auto-based concurrency standard is now producing denial recommendations in this corridor under increased scrutiny, the transition to multimodal standards must be carefully evaluated to ensure it does not inadvertently lower the bar. Specifically, a multimodal framework that credits theoretical future bicycle, pedestrian, or transit person-trip capacity—for facilities that do not exist, are not funded, and in some cases cannot be physically accommodated within the existing road cross-section—could reverse a concurrency denial that the current vehicle-based standard would uphold. This would represent a reduction in actual concurrency protection, not an improvement.

- What concurrency framework does the County intend to use for the 2025 Comprehensive Plan Update? Will it be vehicle-based, multimodal, or a hybrid approach?
- If the County adopts multimodal concurrency, how will person-trip capacity be calculated for corridors with no transit service, no bike facilities, and no sidewalks? Will the multimodal capacity of such corridors effectively default to vehicle-only capacity?
- Could multimodal concurrency be used to approve development in areas where the auto LOS is failing, by crediting theoretical future bike or pedestrian capacity that does not yet exist and is not funded? What safeguards would prevent this?
- The County's April 8, 2026 staff report for the 174th Street Subdivision (PLD-2026-00002) recommends denial to the Hearing Examiner for failure to meet concurrency standards under the current vehicle-based framework. If the concurrency framework changes to multimodal before the Comprehensive Plan is adopted, would development decisions in this corridor be revisited under the new standards? If so, on what basis would multimodal person-trip capacity be credited for a corridor that currently has no bicycle, pedestrian, or transit facilities?
- For areas where multimodal infrastructure does not exist today, will the County require that multimodal improvements be constructed before crediting them toward concurrency? Or will planned but unfunded improvements count toward the multimodal LOS assessment?

## **E. Highway 99 and the BRT Corridor**

Highway 99 illustrates the cross-section challenge that multimodal LOS standards create on constrained corridors. The road currently has two travel lanes in each direction with a center turn lane, narrow painted bike lanes, and limited sidewalk facilities. C-TRAN's Vine on Highway 99 BRT (Purple Line) is under construction and will operate in mixed traffic—sharing the existing travel lanes with general vehicle traffic.

WSDOT's Complete Streets requirement (RCW 47.04.035) directs that active transportation facilities achieve LTS 2 within designated population centers. Highway 99 through Hazel Dell and Salmon Creek runs through population centers. Achieving LTS 2 on a road with 35-40 mph speeds and current traffic volumes would require protected

bike lanes, which cannot be accommodated within the existing cross-section without either widening the road or removing vehicle travel lanes.

- What is the planned cross-section for Highway 99 once the BRT is operational and MMLOS standards are in effect? Will vehicle travel lanes be removed to accommodate protected bike facilities?
- If a lane is removed in each direction to meet MMLOS standards, has a traffic analysis been performed to evaluate the impact on vehicle congestion, BRT operations in mixed traffic, and freight mobility?
- For corridors like Highway 99 where the right-of-way cannot accommodate all modes at desired LOS, how does the County prioritize between vehicle capacity, transit operations, and active transportation facilities?

## **F. Timing and Sequencing**

The relationship between the alternative selection, the Transportation Element, and the multimodal LOS standards raises sequencing concerns. The County has previously stated that the alternative must be selected before the Transportation Element can proceed. However, the alternative was evaluated using only auto metrics, and the multimodal analysis will be completed afterward. The Council is scheduled to select a preferred alternative on April 27 or 28—before the multimodal LOS analysis is available.

- The Council is scheduled to select a preferred alternative on April 27 or 28 without the benefit of the multimodal LOS analysis. Will the Final EIS incorporate the multimodal analysis, and if it reveals deficiencies not identified in the DEIS, what is the process for addressing those deficiencies? Would a supplemental EIS be required, or can the preferred alternative selection be reconsidered?
- Will the Planning Commission and Council have the opportunity to review and comment on the multimodal LOS analysis and the active transportation network before the Transportation Element is finalized?
- What is the estimated timeline for completing the Transportation Element, including the multimodal LOS standards, the active transportation network, and the capital facilities plan? Is this timeline consistent with the overall Comprehensive Plan adoption schedule?

## **Closing**

I appreciate the work that staff, DKS Associates, and the Bicycle and Pedestrian Advisory Committee have done on the active transportation network and multimodal LOS standards. These are important components of a modern transportation plan. My concern is not with the goal of multimodal transportation but with the practical implementation in areas that lack the infrastructure, the funding, and the physical road width to support it—and with the risk that the transition to multimodal standards could obscure real capacity constraints that affect residents' daily lives.

The staff recommendation to deny the 174th Street Subdivision for concurrency failure demonstrates that increased scrutiny of concurrency in this corridor is producing the outcome that concurrency is intended to produce—ensuring that development does not outpace infrastructure. Any transition to multimodal standards must preserve this protective function, not provide a mechanism to circumvent it by crediting capacity that does not physically exist and that no one will practically use to travel through a corridor of rural roads to reach essential services.

I respectfully request that these questions be addressed in the Transportation Element development process and that the responses be made available to the public before the Council acts on the Comprehensive Plan.

*Respectfully submitted,*

Heidi Pozzo

NE 179th Street Corridor

Unincorporated Clark County, Washington