

**From:** [Cnty Community Planning](#)  
**To:** [Four Creeks Neighborhood Association](#); [Oliver Orjiako](#); [Cnty Community Planning](#)  
**Cc:** [Bart Catching](#); [Jose Alvarez](#); [Rebecca Messinger](#)  
**Subject:** RE: COMPREHENSIVE PLAN: Do not select an alternative that increases density when concurrency has clearly not been met.  
**Date:** Monday, April 13, 2026 8:22:47 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Andrew,

Thank you for your comment related to the selection of the preferred alternative for the Clark County Comprehensive Plan update.

This comment will be forwarded to members of the Planning Commission ahead of the Apr. 16<sup>th</sup> Work Session. I have also added Staff representatives from the Agricultural Advisory Commission and Council's office. This comment will also be added to the Index of Record.

Best,



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Program Assistant  
COMMUNITY PLANNING

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**From:** Four Creeks Neighborhood Association <fourcreeksna@gmail.com>

**Sent:** Monday, April 13, 2026 8:00 AM

**To:** Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Ken Lader

<Ken.Lader@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Cnty Community Planning <CommunityPlanning@clark.wa.gov>

**Subject:** COMPREHENSIVE PLAN: Do not select an alternative that increases density when concurrency has clearly not been met.

**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.

**Please forward this email to the Clark County planning commission as public comment for their related April 16, 2026 work session and to the Clark County agriculture commission.**

Dear Clark County Council, staff, and commission volunteers,

On behalf of the Four Creeks Neighborhood Association, we are writing to respectfully request that you **do not select Preferred Alternative 2, or any alternative that increases residential density in the NE 179th Street corridor and Salmon Creek area**, until the transportation infrastructure exists to support it.

We are not opposed to growth. We are asking that growth be sequenced responsibly, consistent with the Growth Management Act's requirement that infrastructure be concurrent with development.

The traffic impact studies tell a clear and consistent story: the NE 179th Street corridor and the Salmon Creek commercial area are already projected to exceed capacity, even after planned improvements are assumed to be built. These studies were commissioned by developers and prepared by licensed professional engineers in support of developments that are currently planned but not yet fully constructed. Their findings are accepted by County staff as part of the concurrency review process.

Across multiple studies for projects now in the County's development pipeline, the following conditions are documented at buildout:

- NE 179th Street between I-5 and NE 15th Avenue is projected to operate at volume-to-capacity (V/C) ratios of 1.14 to 1.17 — well above the County's 0.90 concurrency threshold — under background conditions before project traffic is even added.
- NE 10th Avenue between NE 189th Street and NE 179th Street reaches V/C ratios

as high as 1.33 under background conditions.

- The NE 50th Avenue / NE 179th Street intersection is projected to fail at LOS (Level of Service) F during the PM peak hour under background conditions in multiple studies.
- NE 139th Street between NE 20th Avenue and NE 23rd Avenue — a key link serving the Salmon Creek commercial area — is projected to exceed the 0.90 V/C threshold.
- NE 72nd Avenue between NE 179th Street and NE 139th Street — connecting the corridor to Salmon Creek — fails under existing conditions in some studies, with background V/C ratios reaching 1.13 to 1.23.
- The NE 72nd Avenue / NE 159th Street intersection fails at LOS E in the PM peak hour, with signal warrants met, documented across multiple studies.

**These failures are not confined to a single road.** They span the NE 179th Street corridor, the connecting north-south routes, and the road network serving the Salmon Creek commercial area. The transportation problems are regional, and adding density will make them worse.

Critically, these failures appear even though every study assumes that all currently programmed corridor improvements, including the I-5/179th Street interchange reconstruction, corridor widening, and multiple roundabouts, will be completed. Several of these improvements are not yet under construction, and key corridor segments between NE 29th Avenue and NE 50th Avenue are not listed as "Reasonably Funded" in the 2026–2031 Transportation Improvement Program. For additional information, see [www.179gridlock.com](http://www.179gridlock.com).

Increasing density before the infrastructure catches up will compound failures that are already documented. It will degrade safety, quality of life, and emergency response times for existing residents, and it will place new residents into a transportation network that cannot serve them.

**We ask the Council to:**

1. Defer any density increases in the NE 179th Street corridor and Salmon Creek area until corridor improvements are constructed and operational — *not merely programmed*.
2. Direct staff to prepare a cumulative traffic impact analysis that accounts for all currently approved, in-process, and anticipated developments loading this network simultaneously.
3. Ensure that the Comprehensive Plan update is internally consistent with the

Capital Facilities Plan and actual infrastructure timelines, as required by the Growth Management Act.

**Clark County has done this before.** From 2001 to 2006, the County imposed a development moratorium in the Salmon Creek area under materially similar circumstances — concurrency failures on the transportation network that could not be resolved without completed infrastructure improvements. The conditions documented in the NE 179th Street corridor and Salmon Creek area today are, by the developers' own traffic data, at least as severe.

**We respectfully urge you to get the infrastructure right before adding density. The data supports nothing less.**

Sincerely,

Andrew Cecka  
Four Creeks Neighborhood Association  
[FourCreeksNA.org](http://FourCreeksNA.org)  
[Four Creeks Facebook](#)  
[Neighborhood Map](#)