

From: mark@eriksonlaw.com
To: [Bart Catching](#)
Cc: ["Kris Eklove"](#); [Wendy Baird](#); [Jeffrey Delapena](#)
Subject: 174th Street Subdivision
Date: Wednesday, May 20, 2026 2:21:49 PM

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Bart:

Daniel Stumpf, at PLS, the traffic engineer working on the 174th Street Subdivision for Silver Buckle Homes; sent the report directly to Brent Davis.

I was merely commenting on the Growth Management Update.

By the way, the report covers defacto moratoria across the County.

Mark A. Erikson
Attorney at Law
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110 West 13th Street
Vancouver, Washington 98660
(360) 696-1012

From: Bart Catching <Bart.Catching@clark.wa.gov>
Sent: Wednesday, May 20, 2026 2:05 PM
To: mark@eriksonlaw.com
Cc: 'Kris Eklove' <kris@eriksonlaw.com>; Wendy Baird <Wendy.Baird@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: RE: 174th Street Subdivision

Mark,

My co-worker Jeff Delapena will add this to the comp plan record and we will forward to the clerk of the council.

I am happy to help with this, but for future reference, I am not working directly with the 179th corridor developments and we have specific transportation planners as well.

I see the memo is addressed to Brent. I assume that is why Wendy is cc'd, or was this

sent to Brent separately?

Thanks,

- Bart

From: mark@eriksonlaw.com <mark@eriksonlaw.com>

Sent: Wednesday, May 20, 2026 1:57 PM

To: Bart Catching <Bart.Catching@clark.wa.gov>

Cc: 'Kris Eklove' <kris@eriksonlaw.com>; Wendy Baird <Wendy.Baird@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>

Subject: FW: 174th Street Subdivision

Importance: High

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Bart:

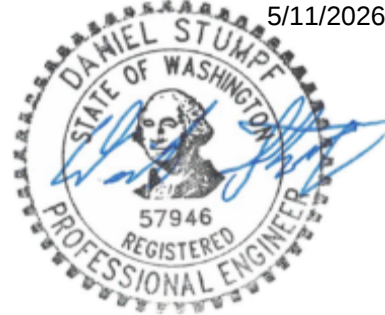
Our traffic engineer prepared a report on existing defacto development moratoria caused by the administration of volume to capacity ratios.

Please provide copies to the Clark County Councilors as public comment on the Comprehensive Plan Update.

Mark A. Erikson
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To: Brent Davis, Clark County
From: Daniel Stumpf, PE
Date: 5/11/2026
RE: Failing Corridor Evaluation Memorandum



5/11/2026

Introduction

This memorandum provides an inventory and evaluation of regionally significant corridors throughout Clark County, located within the Vancouver Urban Growth Area (UGA) but outside Vancouver City limits. Specifically, this review pertains to Clark County Unified Development Code section 40.350.020.G.1.a. and corridors which are currently or projected to operate with a volume-to-capacity (v/c) ratio in excess of 0.90 based on recent transportation analysis work conducted throughout Clark County. The following items were conducted and reviewed in this memorandum:

- Inventory regionally significant corridors that were documented as exceeding a 0.90 v/c ratio for a single direction of travel.
- Evaluate surrounding areas where impacts to these corridors would potentially preclude land use development.
- Catalogue prior and current land use applications which would have or could be affected by a failing corridor.

Clark County Unified Development Code

According to Clark County Unified Development Code section 40.350.020.G.1.a.:

The maximum volume to capacity ratio for each roadway segment shall not exceed nine-tenths (0.9), when measured independently for each direction of travel. Measurements shall be made for all collector and arterial roadway segments located within the Vancouver Urban Growth Area, but outside of the City of Vancouver. Measurements shall also be made for state highways of regional significance.

Table 40.350.020-1 *Roadway Capacities* in this section of the code provides a listing of single direction capacities per hour for all Urban and Rural Collector and Arterial roadways. Note that no such capacity standard is provided for State Highways of regional significance. For the purpose of this memorandum, it is assumed that State Highways utilize a single direction capacity of 2,000 vehicles per hour, which reflects the capacity assigned to an Urban Arterial Parkway (i.e., the highest classification of roadway under County code).

When evaluating corridor and intersection operation, Clark County staff have consistently applied this 0.90 v/c ratio standard as “*an indicator that these roadway segments should be subjected to site-specific study with a more detailed operational analysis before any major design, reconstruction, or investment decisions are made.*” Furthermore, as long as regionally significant signalized and unsignalized intersections operate within acceptable Level of Service (LOS), a reported corridor v/c ratio in excess of 0.90 “*does not represent roadway deficiencies, rather corridor mobility facilitated with good intersection LOS.*” This practice and interpretation of code 40.350.020.G.1.a has been applied by the County over the past one to two decades as part of the land use review process.

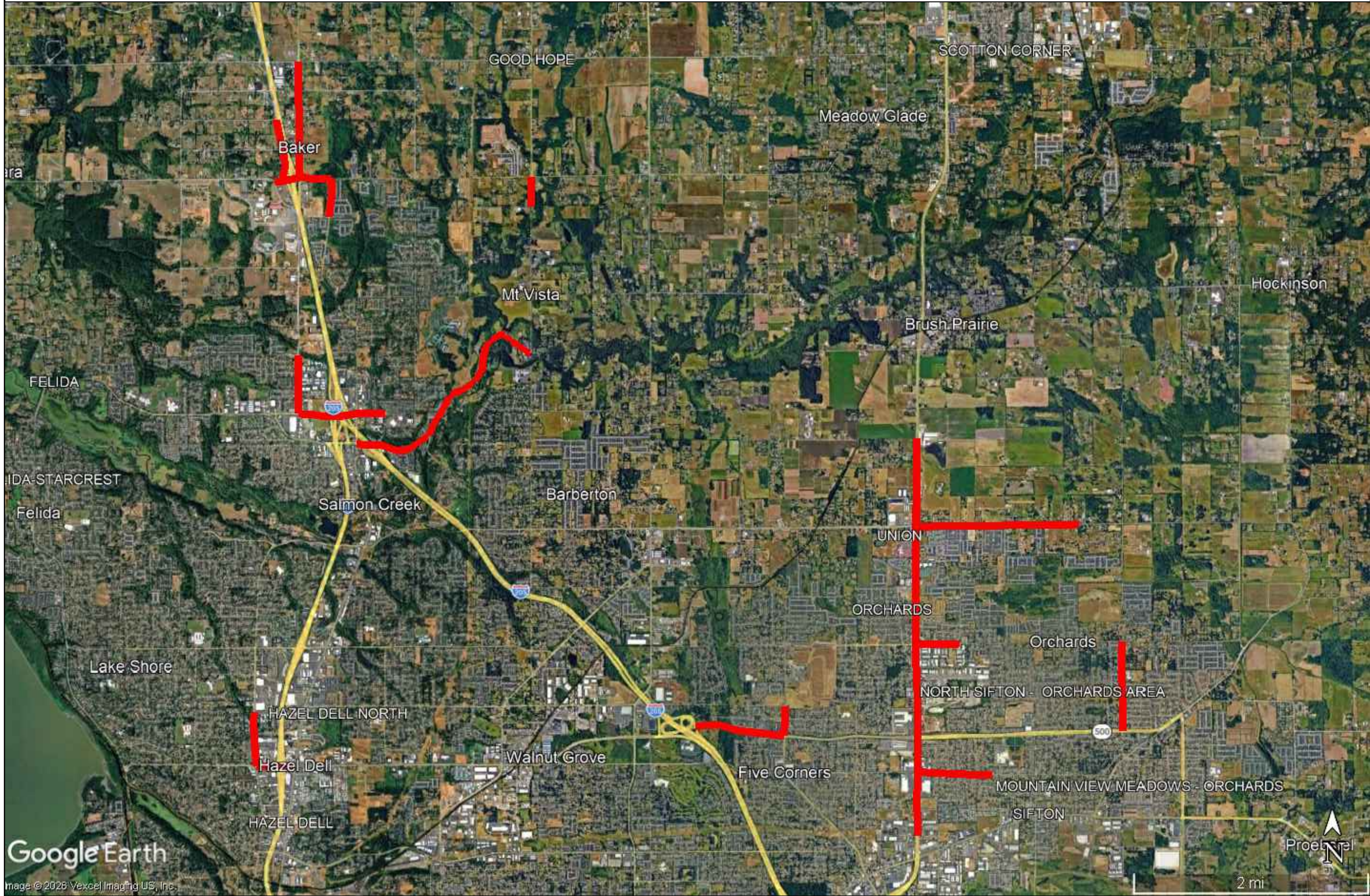
During this one to two decade period, several Clark County corridors within the Vancouver UGA have been identified as operating in excess of 0.90. Assuming a literal interpretation of 40.350.020.G.1.a were applied to these regionally significant corridors, a de facto moratorium would go into effect that would immediately preclude approval of any land use development that shows an impact to a failing corridor. This potential denial of any land use application, regardless of how significant or minor an impact to a corridor, cannot be remedied since the single direction capacities described in Table 40.350.020-1 are intrinsically tied to a roadway’s functional classification rather than its physical design or the operation of regionally significant intersections along the corridor.

Failing Regionally Significant Corridors

Based on a limited survey of 27 traffic studies prepared throughout Clark County over the past five to eight years, several regionally significant corridors were identified as exceeding an 0.90 v/c ratio. These corridors and the reported v/c ratios are presented in Table 1. Figure 1 provides a visual depiction of these corridors throughout Clark County.

Table 1 – Failing Clark County Corridors within the Vancouver UGA

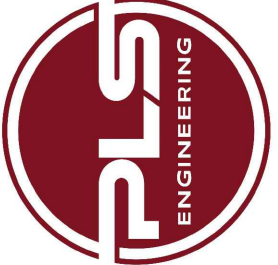
Roadway Name	Classification	Single Direction Capacity/Hour	Between	V/C Ratio	Peak Hour	
					AM	PM
NE/NW 179th Street	Pr-4cb	1800	NE Delfel Road to NE 15th Avenue	0.923 to 1.173		X
NE 139th Street	C-2cb	900	NE 20th Avenue to NE 23rd Avenue	0.917 to 1.24		X
NE 139th Street	M-4cb	1800	NE 10th Avenue to NE 20th Avenue	0.91 to 0.94		X
NE 134th Street	M-4cb	1800	NE 20th Avenue to NE Salmon Creek Avenue	1.03 to 1.12	X	X
NE Salmon Creek Avenue	C-2cb	900	NE 134th Street to NE 50th Avenue	1.08	X	
NE 119th Street	M-2cb	900	SR 503 to NE 152nd Avenue	0.97 to 1.10		X
NE 99th Street	M-2cb	900	SR 503 to NE 124th Avenue	0.92 to 1.01	X	X
NE Padden Parkway	Pa-4b	2000	I-205 NB Ramps to NE 94th Avenue	0.92	X	X
NE 78th Street	Pr-4cb	1800	Hazel Dell Avenue to NE Highway 99	0.906 to 1.02	X	X
NE 76th Street	C-2cb	900	SR 503 to NE 130th Avenue	1.034 to 1.06		X
Hazel Dell Avenue	M-2cb	900	NE 78th Street at NE 88th Street	0.93		X
NE Delfel Road	C-2	800	NE 179th Street to NE 189th Street	0.906		X
NE 10th Avenue	C-2cb	900	NE 139th Street to NE 149th Street	1.078		X
NE 10th Avenue	M-2cb	900	NE 179th Street to NE 199th Street	0.91 to 1.338		X
NE 15th Avenue	M-2cb	900	NE 174th Street to NE 179th Street	0.978 to 0.991		X
NE 50th Avenue	M-2cb	900	NE 174th Street to NE 179th Street	1.13		X
NE 94th Avenue	M-2cb	900	NE 88th Street to NE Padden Parkway	1.133	X	X
SR-503	State Hwy (Pa-4b)	2000	UGA North Boundary to NE 65th Street	0.928 to 1.066	X	X
NE 152nd Avenue	C-2b	800	NE 99th Street to NE Padden Parkway	0.93		X



FAILING CORRIDOR MAP

VANCOUVER URBAN GROWTH AREA
CLARK COUNTY, WASHINGTON

FIGURE 1



The corridors described and shown in Table 1 and Figure 1 were identified in the following transportation studies:

1. *The Heights at Salmon Creek Transportation Impact Study (TIS)*, dated March 11, 2026.
2. *Glenwood Landing Subdivision TIS*, dated January 27, 2026.
3. *Vancouver Public Works Operations Campus TIA*, dated January 15, 2026.
4. *Towhee Creek Subdivision TIS*, dated December 30, 2025.
5. *NE 174th Street Subdivision TIS*, dated December 4, 2025.
6. *Livingstone Meadows Subdivision TIS*, dated November 5, 2025.
7. *Andresen Dental Office TIS*, dated October 27, 2025.
8. *Three Creeks East Planned Unit Development TIS*, dated June 24, 2025.
9. *Provision Warehouse TIS*, dated May 16, 2025.
10. *Four Creeks North TIS*, dated April 18, 2025.
11. *NE 173rd Street U-Haul*, dated August 22, 2024.
12. *88th Street & St Johns Road TIS*, dated July 2, 2024.
13. *Cody Property Subdivision TIS*, dated December 1, 2023.
14. *Vertex Apartments Traffic Analysis Report*, dated March 2023.
15. *Salmon Creek Terrace Traffic Analysis Report*, dated February 6, 2023.
16. *Viers Subdivision Planned Unit Development Transportation Impact Analysis (TIA)*, dated December 2022.
17. *NE 29th Avenue Subdivision TIA*, dated October 2022.
18. *Wash Kings TIS*, dated October 14, 2022.
19. *BAK II Addition*, dated July 29, 2022.
20. *117th Ave Mixed-Use TIS*, dated June 2, 2022.
21. *Orchards Plaza Retail Traffic Analysis Report*, dated May 2022.
22. *Blackbird Corner Subdivision TIS*, dated February 9, 2022.
23. *Salmon Creek Memory Care TIS*, dated September 21, 2021.
24. *Plum Creek 2 Subdivision Traffic Analysis Report*, dated September 10, 2021.
25. *Hockinson Hollow TIS*, dated August 12, 2020.
26. *NE 13th Avenue Site Plan Traffic Analysis Report*, dated November 26, 2019.
27. *Skyview Station TIS*, dated September 17, 2018.

These referenced studies were prepared for only a small fraction of the development applications submitted or planned for submittal within Clark County. Note that these referenced traffic studies do not cover or review impacts for all regionally significant corridors within the Vancouver UGA. Additionally, none of the traffic studies reviewed peak hour volumes along Interstate 5 or Interstate 205 which are arguably State Highways of regional significance that exceed the 2,000 single direction capacity per hour threshold. Therefore, there is a reasonable possibility that additional corridors throughout Clark County, beyond those depicted in Table 1 and Figure 1, exceed this 0.90 v/c ratio standard.

Impacts on Land Use Development

According to Clark County code section 40.350.020.D.5 and 7:

A transportation impact study shall not be required to analyze impacts on affected transportation corridors or intersections of regional significance located at least the following distances from the proposed development (as measured by straight-line distance):

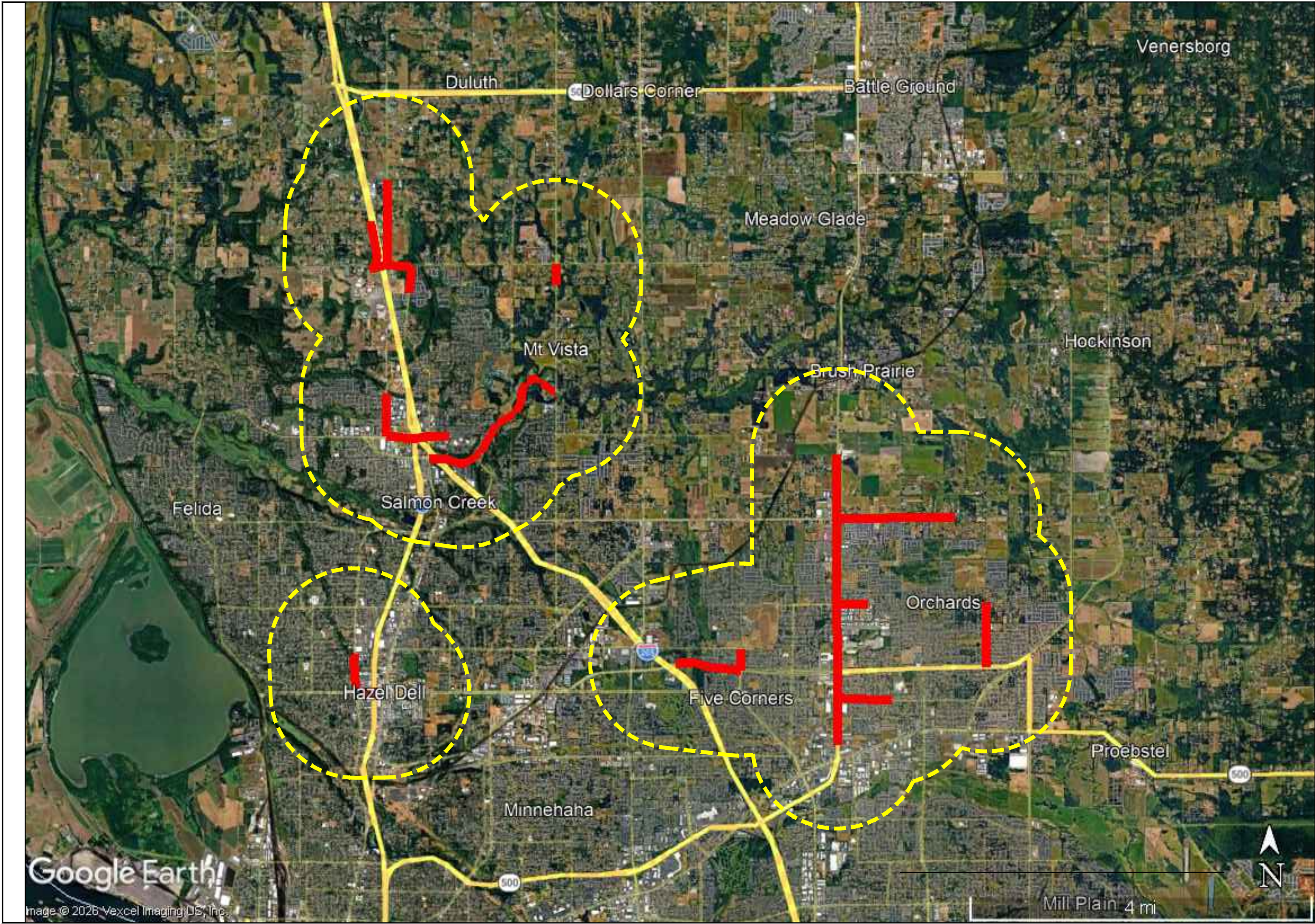
- a. Fifty (50) or less new peak period trips at development site: one (1) mile;*
- b. Fifty-one (51) to two hundred fifty (250) new peak period trips at development site: two (2) miles;*
- c. Two hundred fifty-one (251) or more new peak period trips at development site: three (3) miles.*

No traffic impact study shall be required, pursuant to the provisions of this section, where the proposed development will generate less than ten (10) peak period vehicle trips. However, these proposed developments are still subject to concurrency reviews and require concurrency approvals.

Based on this code language, any land use of sufficient size that generates at least 10 peak hour trips and are located within these respective distances from a failing corridor could be subject for denial. For context, examples of land uses that could generate 10 or more new peak hour trips include the following:

- Eleven (11) or more single-family detached houses.
- A 19-unit apartment building.
- Any elementary, middle, or high school which enrolls 14-19 or more students.
- General retail buildings/space of approximately 2,700 square feet or larger.
- Most restaurants or food vendors that are greater than approximately 600 to 1,800 square feet in size.

Figures 2 and 3 depict areas of Clark County that are located within a one and two-mile distance of a failing corridor. Theoretically any development application could be denied, without the ability to propose mitigation, if located in these areas.



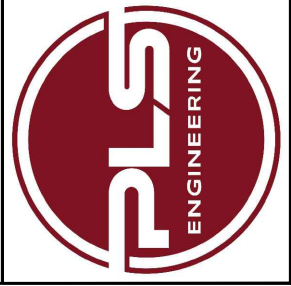
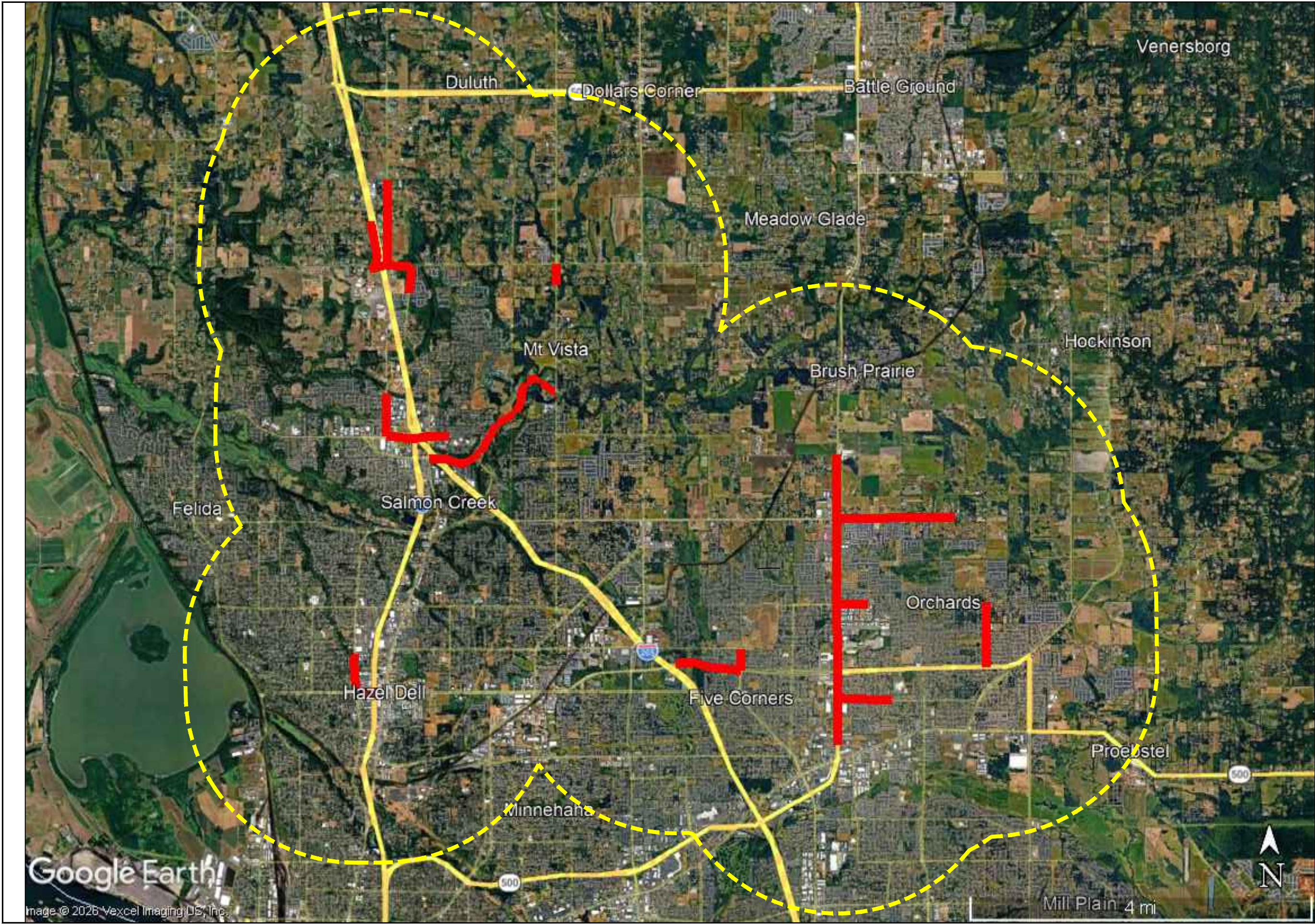
	Failing Corridor Map: One-Mile Distance	
	Vancouver Urban Growth Area Clark County, Washington	

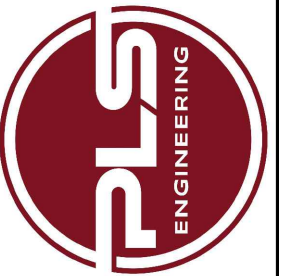
FIGURE 2



FAILING CORRIDOR MAP:
TWO-MILE DISTANCE

VANCOUVER URBAN GROWTH AREA
CLARK COUNTY, WASHINGTON

FIGURE 3



Referring to the list of reviewed traffic studies provided in this memorandum, if a literal interpretation of code section 40.350.020.G.1.a had been or is applied to these applications, the following could not have been or cannot be developed within Clark County:

- Approximately 1,809 residential dwelling units:
 - 1,062 single-family detached houses.
 - 168 townhouses.
 - 579 apartment units.
- Approximately 137,140 square feet of commercial building space.
- Approximately 247,181 square feet of industrial building space.
- Approximately 43,492 square feet of medical building space.
- Approximately 428 government jobs.

As previously mentioned in this memorandum, lost housing supply, employment opportunities, and services associated with the above projects are only a small fraction of the total impacts a literal interpretation of code section 40.350.020.G.1.a would have had on Clark County as a whole over the past five to eight years.

At the time of writing and looking forward, in the upcoming year approximately 36 planned land use development projects may be denied by this literal application of code section 40.350.020.G.1.a. The potential lost housing supply, employment opportunities, and services associated with these projects are listed below.

- Approximately 2,000 residential units (24 residential projects).
- Seven industrial development projects, consisting of a mix of smaller contractor style businesses to larger light industrial/manufacturing/warehouse style uses.
- Two commercial development projects, including a small restaurant/coffee shop and a larger commercial center.
- Two mixed use development projects on a combined 15 acres. These projects would consist of both residential housing and commercial space.
- One religious institution intending to build or renovate a house of worship.

Note that these projects do not include all planned/potential land use development projects in Clark County, only those provided to PLS Engineering by a limited number of planners, engineers, developers, and other professionals listed in the acknowledgments section of this memorandum. To reiterate, this listing does not include Clark County projects from other consultants and developers who may be located in Clark County, other regions of Washington State, or those out of State.

Conclusion

Historically when evaluating corridor and intersection operation per code section 40.350.020.G.1.a, Clark County staff have consistently applied this 0.90 v/c ratio standard as “an indicator that these roadway segments should be subjected to site-specific study with a more detailed operational analysis before any major design, reconstruction, or investment decisions are made.” Furthermore, as long as regionally significant signalized and unsignalized intersections operate within acceptable Level of Service (LOS), a reported corridor v/c ratio in excess of 0.90 “does not represent roadway deficiencies, rather corridor mobility facilitated with good intersection LOS.” Several Clark County corridors within the Vancouver UGA have been identified as operating in excess of 0.90. Assuming a literal interpretation of 40.350.020.G.1.a were applied to these regionally significant corridors, a de facto moratorium would go into effect that would immediately preclude approval of any land use development that shows an impact to a failing corridor.

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If you have any questions or concerns regarding this memorandum, please do not hesitate to contact me at daniels@plsengineering.com.

Acknowledgements

The following firms and companies contributed data toward the development of this memorandum (listed in alphabetical order):

- AKS Engineering and Forestry
- Hayward Uskoski and Associates, Inc
- MacKay Sposito
- PLS Engineering
- Rotschy, Inc
- SGA Engineering
- Sterling Design