

From: [Jeffrey Delapena](#)
To: ["Heidi Pozzo"](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#)
Subject: FW: Comments for Planning Commission Session tonight/2025 Comp Plan
Date: Thursday, June 18, 2026 2:02:00 PM
Attachments: [PC Comment 2025 CompPlan 2026-06-18.pdf](#)
[179 Gridlock Highlighted.pdf](#)
[Ex 100 Failing Corridor Eval Memo.pdf](#)

Good day, Heidi,

Thank you for providing feedback related to tonight's Planning Commission Work Session regarding the Comprehensive Plan Chapter Review.

Your comments will be brought to the attention of the Planning Commission ahead of tonight's meeting. This will also be added to the Index of Record.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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

From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Thursday, June 18, 2026 1:56 PM
To: Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>
Subject: Comments for Planning Commission Session tonight/2025 Comp Plan

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 my comments for the work session tonight.

Thank you,

Heidi

Heidi Pozzo

13023 NE Highway 99, Ste. 7-298
Vancouver, WA 98686

June 18, 2026

Clark County Planning Commission
c/o Jeffrey Delapena
PO Box 9810
Vancouver, WA 98666-9810

Re: Written comment for the record — 2025 Comprehensive Plan Update, Land Use Element (June 18, 2026 work session); concurrency, density, and jobs-housing balance in the NE 179th Street / Salmon Creek and SR-503 / NE 119th Street corridors

Dear Chair and Members of the Planning Commission:

I submit these written comments for the record on the Land Use Element of the 2025 Comprehensive Plan Update, reviewed at tonight's work session. The Land Use Element is the central element of the plan, and the draft itself states that the Transportation and Capital Facilities elements must be consistent with it and that the Land Use map must not specify a development pattern that cannot be adequately served. Several of the concerns below go to that required consistency. I ask that these comments be entered into the record so the issues are preserved for review. Citations are to the draft Land Use Element dated June 18, 2026, the adopted County Code, and the GMA.

1. The plan's own text requires denial of development that cannot meet adopted transportation standards — yet corridors in this area already fail that standard, even when modeled in their improved condition.

The draft Land Use Element's Concurrency section states that the GMA requires adopted transportation level-of-service standards and that development proposals which cannot demonstrate compliance must *be denied*. The County's adopted corridor standard is a volume-to-capacity (V/C) ratio of 0.90 or less (CCC 40.350.020(G)(1)(a)). The developer-commissioned traffic studies prepared for individual subdivisions in these corridors — not studies prepared by the County — model the corridors in their improved condition, crediting the improvements programmed on the six-year Transportation Improvement Program (TIP) as though already built. Even modeled in that improved condition, corridors in the NE 179th Street / Salmon Creek and SR-503 / NE 119th Street areas do not meet the adopted standard. This is documented in the attached failing-corridor evaluation memorandum prepared by Daniel Stumpf, PE (Exhibit 100 in the PLD-2026-00002 record) and in the attached NE 179th Street corridor analysis. The

plan should not direct growth onto corridors that its own concurrency text says cannot lawfully absorb it.

2. The draft increases allowed residential density on these corridors — raising both the minimum and the maximum — without identifying any corridor capacity analysis supporting the increase.

The draft raises allowed density in the 179th Street area, some of which is designated Urban Medium Density Residential or zones that allow residential. It changes the implementing zones for Urban Medium Density from R-12, R-18, and R-22 to R-24 and R-36, as well as tightening the range in each zone. Removing the lower zones lifts the bottom of the density range — raising the minimum density that development must achieve — while the higher zones raise the ceiling. Because the draft states that minimum densities assure areas build out to the density planned, lifting the floor while raising the ceiling is a substantial step up in the development these corridors must absorb.

Higher density generates more vehicle trips. The Land Use materials reviewed tonight do not identify any corridor-level capacity analysis demonstrating that the transportation network can carry the added trips at the adopted V/C standard, and the detailed corridor transportation analysis is scheduled for a later stage of this update. If such an analysis exists, the County should identify it; if it does not, the density increases are being advanced ahead of the analysis that would show whether the adopted standard can be met. Either way, the draft places the Land Use and Transportation elements in tension. Land Use Policy 1.1.4 directs that growth be located primarily where existing public facilities have capacity to serve it, and Policy 1.2.2 requires each UGA to have the financial capability to provide needed infrastructure under adopted concurrency standards. Increasing density on corridors that already fail the adopted standard is not consistent with RCW 36.70A.070(6) or the internal-consistency requirement of RCW 36.70A.070.

3. The draft commits no infrastructure beyond what is already programmed, on corridors that already fail the adopted standard.

RCW 36.70A.070(6)(b) requires the transportation element to include a multiyear financing plan and a commitment to complete the needed improvements within six years. The current six-year TIP includes some improvements in the 179th Street corridor, and additional projects in the corridor have been identified but are not yet funded. Even taken together, the programmed and identified projects would resolve only a few of the corridor's deficiencies; most would remain. Advancing density increases now — on corridors that already fail the adopted standard even when the programmed improvements are credited as built — without funded commitments sufficient to bring the corridors into compliance within the six-year window, makes further degradation of

these corridors the predictable result. The same concern applies to the SR-503 / NE 119th Street area.

4. The concurrency and adequacy concerns extend beyond roads to schools, fire, law enforcement, stormwater, sewer, and water infrastructure.

Increased density raises demand on public services and urban infrastructure beyond the road network. The draft Land Use Element recognizes that urban development requires urban services to be available. Schools, fire protection, and sheriff/law-enforcement services in this area are already strained. In addition, stormwater, sewer, and water systems must be built out to serve the planned density. Some of these facilities require significant funding that is difficult to secure. The draft should demonstrate that these services and facilities can be provided at appropriate service levels before the added density is adopted, consistent with the requirement that the Land Use map not specify a pattern that cannot be adequately served and with Land Use Policy 1.2.2, which requires each UGA to have the financial capability to provide needed infrastructure under adopted concurrency standards.

5. The City of Vancouver has warned in the record that concentrating housing without nearby jobs appears to violate HB 1181 — and the County is poised to remove scarce employment land near 179th Street.

HB 1181 (Chapter 228, Laws of 2023) amended the GMA to add a climate-change and resiliency goal and to require land use elements to reduce per-capita vehicle miles traveled (VMT) (see RCW 36.70A.070(1) and 36.70A.070(9)). The draft commits throughout to reducing per-capita VMT and tracks VMT-reduction policies in Appendix I. The City of Vancouver placed this concern in the Comprehensive Plan record. In a letter dated November 6, 2024, signed by Councilmember Erik Paulsen, the City warned that the Vancouver UGA is uniquely challenged because so much of its housing sits far from commercial services and employment, and that the lack of employment land is a major contributor to long commutes and congestion. In a comment letter on the Preferred Alternative dated January 8, 2026, signed by Mayor Anne McEnerny-Ogle, the City stated that the failure to provide or allow commercial and employment uses near residential areas in wide swaths of the existing Vancouver UGA forces residents into long drives that further clog arterial roadways, and that this appears to violate HB 1181's mandate to lower per-capita VMT and Countywide Planning Policy 1.4.1. None of the commercial or employment sites the City identified were included in the selected alternative.

This problem is about to worsen in the 179th Street area. The County is considering siting its North County solid waste transfer station, as I understand it on NE 10th Avenue between NE 199th and NE 209th Streets, which would remove one of the few remaining large parcels (roughly 20 to 40 acres) suited to employment use in this area.

Eliminating scarce employment land here widens the jobs-housing gap the City of Vancouver identified and pushes per-capita VMT in the wrong direction. The draft's own Urban High Density designation states that such areas shall be located near commercial and employment centers, and Land Use Policy 1.4.13 calls for employers and the residential areas they serve to locate near one another. Concentrating housing away from jobs is inconsistent with the plan's own VMT commitments, with RCW 36.70A.070(9), and with WAC 365-196-310(4)(b)(iv).

6. The draft plans above the OFM middle-series projection, concentrating that excess growth in the Vancouver UGA.

The draft plans for a 2045 county population of 718,154, while OFM's middle-series projection — the one OFM considers most likely — is 698,416. The draft therefore plans roughly 19,700 people above the most-likely projection. The City of Vancouver made the same observation in its November 6, 2024 letter, noting that the adopted forecast is approximately 20,000 persons above what the state predicts is most likely to occur. The draft also directs roughly three-quarters of countywide growth (about 138,865 of 190,754 added residents) to the Vancouver UGA. Planning above the most-likely projection, and concentrating it where the corridors already fail the adopted standard, compounds the concurrency deficit. The County should explain the basis for planning above the OFM middle series and reconcile it with that deficit.

7. The draft contradicts its own environmental-justice findings.

The draft's "Overburdened Communities" section states that placing additional growth near heavy-traffic roadways could expose future residents and workers to diminished air quality, heightened noise, and hotter temperatures, affecting health. GMA, as amended, requires the Land Use Element to give special consideration to avoiding or worsening environmental health disparities. Increasing residential density on corridors that already fail the adopted concurrency standard directs more population onto exactly the kind of heavy-traffic roadway the draft identifies as a health concern. The plan should not recognize this harm in one section while directing more housing onto the affected corridors in another, without mitigation.

8. The County should confirm that it will not carry forward its non-code concurrency methodology, which has not been analyzed in this update.

The County's current concurrency practice approves development on failing corridors by substituting an intersection level-of-service judgment for the adopted corridor V/C standard. That substitution has no basis in CCC 40.350.020(G)(1)(a), which sets the corridor standard; subsection (F)(9) governs the traffic inputs, not the 0.90 standard. As far as can be determined, this non-code methodology has not been analyzed as part of the Comprehensive Plan update. By allowing development to continue on corridors that fail the adopted standard, the methodology generates demand for additional roadway

capacity that the Comprehensive Plan does not provide for, and it increases congestion, vehicle emissions, and per-capita VMT — contrary to the plan's HB 1181 commitments (RCW 36.70A.070(9)). I ask the Commission to confirm on the record that the County will not carry forward this non-code methodology, and to analyze the concurrency methodology for GMA compliance as part of this update.

Requested action

I respectfully ask the Planning Commission to recommend that the Council:

- Not increase allowed density — including raising the minimum-density floor — on corridors that fail the adopted concurrency standard until a corridor-level capacity analysis and a committed six-year funded improvement plan demonstrate the standard can be met;
- Identify any corridor capacity analysis relied on for the density increases, or perform one before the increases are adopted;
- Demonstrate that schools, fire protection, law enforcement, and stormwater, sewer, and water infrastructure can serve the added density at appropriate service levels, and identify the funding to provide them;
- Preserve the scarce large employment parcels in the 179th Street area rather than removing them, and address the City of Vancouver's HB 1181 / VMT and jobs-housing concerns by designating employment and commercial land near the planned housing, consistent with Land Use Policy 1.4.13 and WAC 365-196-310(4)(b)(iv);
- Explain and reconcile any growth allocation above the OFM middle series with the corridors' unaddressed concurrency deficit;
- Conform the Land Use map and density designations to the draft's own environmental-justice findings regarding growth on heavy-traffic roadways; and
- Confirm on the record that the County will not carry forward the non-code concurrency methodology, and analyze that methodology for GMA compliance as part of this update.

These comments are submitted to ensure these issues are part of the record for the 2025 Comprehensive Plan Update. Thank you for your consideration.

Respectfully submitted,

Heidi Pozzo
13023 NE Highway 99, Ste. 7-298
Vancouver, WA 98686

Enclosures:

- Failing-Corridor Evaluation Memorandum prepared by Daniel Stumpf, PE (Exhibit 100, PLD-2026-00002 record)
- NE 179th Street corridor analysis

NE 179TH STREET CORRIDOR · CLARK COUNTY, WA

179 Gridlock

Clark County's Broken Infrastructure Promise

A compiled, highlighted reference drawn from 179gridlock.com.
Highlights mark the key passages. Use the contents below or the
bookmarks panel to jump between sections.

-
- 1 Homepage
 - 2 Understanding the Numbers
 - 3 Timeline
 - 4 Land Use Hearings
-

Source: 179gridlock.com · Compiled June 8, 2026

NE 179TH STREET CORRIDOR · CLARK COUNTY, WA

They promised roads. They approved houses. The roads still aren't built.

In 2019, Clark County lifted development restrictions on 2,200 acres along NE 179th Street, promising infrastructure would follow within six years. That deadline passed in November 2025. The roads are years behind schedule, tens of millions over original estimates, and development keeps getting approved.

FIGURE	MEANING
6+	Years past the infrastructure deadline
2,200	Acres opened for development in 2019
\$227M+	In planned road projects, most years behind schedule
2,900+	Housing units approved since urban holding was lifted
33,000+	Daily vehicle trips from approved developments alone
LOS F	Failing grade at key intersections today and through 2028—even after planned road improvements

THE PROBLEM

A concurrency system designed to never say no

Washington's Growth Management Act requires a simple deal: if you approve new development, the roads to serve it must be funded and in place within six years. That's the law. It's called "concurrency."

Clark County has a concurrency system. On paper, it checks whether roads can handle new development before that development is approved. In practice, the system has structural features that make it nearly impossible for any project to fail—even when the roads are clearly inadequate.

Here are the four mechanisms that make it work.

Mechanism 1 — Ghost Capacity

Traffic studies measure congestion against the road *as it's planned to exist someday*—not as it exists today. NE 179th Street is physically a two-lane rural road with a capacity around 600 vehicles per hour. But the Arterial Atlas designates it as a future multi-lane arterial with a

capacity of 1,800. Using the bigger number as the denominator makes a failing road look like it has plenty of room.

Mechanism 2 — Limited Study Area

A small subdivision only has to analyze roads within one mile. The I-5 interchange—the corridor's biggest bottleneck—may fall outside that radius entirely. The state's Growth Management Act contains no geographic limitation on concurrency. The distance caps are a County creation that systematically excludes the most constrained points.

Mechanism 3 — Credit for Unbuilt Roads

Developments get credit for road improvements listed in the six-year plan—even if those improvements haven't been built, funded, or designed. The same unbuilt projects cited to lift urban holding in 2019 are still being used to justify approvals in 2026. The NE 29th to NE 50th segment isn't even on the "Reasonably Funded" list. Worse, the I-5/179th interchange is a WSDOT project the County has no authority to build or guarantee—yet the County takes credit for it to approve local development.

Mechanism 4 — No Cumulative Review

Each development is evaluated individually. Five traffic studies were prepared for corridor projects during the same time period—and none of them count the traffic from the other four. Hundreds of trips loading the same roads simply don't appear in each other's analysis. The same engineer prepared multiple studies using the same horizon year, and none included the others as "in-process" developments. This isn't a one-time oversight; it's how the system is structured.

"Based on the information contained in the Clark County Staff Report and timing of WSDOT funding for the interchange, WSDOT supports the staff report recommendation of denial for this proposal."

— WSDOT letter to Community Planning Director Oliver Orjiako, November 7, 2018 — regarding the first urban holding lift application. WSDOT stated the interchange would not be operationally functional until 2028 and that it lacked capacity for additional development. This recommendation was never disclosed to the Planning Commission or County Council at any of the three 2019 hearings where urban holding was lifted.

"When I first saw these corridor projects back when it was talked about as a package and my predecessors were discussing completing these in six years, I don't know of anyone who had done projects like these that thought that was possible."

— Ken Lader, Clark County Public Works Director, July 12, 2023 Council meeting

How the legal standard was softened

The GMA requires that transportation improvements be "in place at the time of development" or that a financial commitment be in place to complete them within six years. That means from day one, the financing must be reasonably committed—not that the County has six years to figure

out how to pay for it. Across three proceedings in 2019, this standard was progressively weakened:

February 2019 (Planning Commission): The applicant's representative reframed the standard as whether "there will be funding in place"—not improvements, just funding.

October 2019 (Planning Commission): Staff stated that "State law allows development to happen when transportation improvements are reasonably funded in that six years." When asked if developments could be finished before infrastructure is in place, staff responded: "Correct."

Neither the Community Planning Director nor the Senior Deputy Prosecuting Attorney—both present at all three hearings—corrected these characterizations.

Randy Printz, the developers' representative who had been meeting with County staff, WSDOT, and at least two County Councilors on a monthly basis since 2016, then confirmed: "I just wanted to make sure that we weren't misleading you, that there isn't a true construction management plan sitting there that says, okay, we're going to start grading on this date and all those sorts of things." This was at the Planning Commission hearing, February 21, 2019. No construction plan existed. Urban holding was lifted that night on a 4-0 vote.

How fragile the numbers are

At the I-5 NB Ramps roundabout on 179th Street, the Towhee Creek study found V/C 0.822 and LOS A (passing). The NE 174th Street study—prepared by the same consulting firm, using the same horizon year—found V/C 1.138 and LOS F (failing) at the same intersection. The difference: roughly 87 vehicles per hour in background traffic assumptions. That's the margin between "approved" and "denied." And remember: five studies were prepared during the same time period without counting each other's traffic. The missing cumulative trips far exceed 87 vehicles. The system has no mechanism to reconcile these contradictory results.

THE EVIDENCE

What 24 traffic studies show — going back to 2018

Twenty-four developer-commissioned traffic studies have been prepared for projects in and around the 179th corridor since 2018. The pattern is consistent and worsening: the same road segments fail in study after study, and the failures get worse each year as more developments are added to the background.

NE 179th Street eastbound between I-5 and NE 15th Avenue fails in every single study that analyzes it — ten studies spanning five years, from V/C 1.01 in 2020 to V/C 1.17 in 2025. Every study uses the inflated Arterial Atlas capacity of 1,800 vehicles per hour for what is physically a two-lane road. Every study credits unbuilt road improvements. And it still fails.

FACILITY	METRIC	CONDITION	STATUS
NE 179th St EB (I-5 to 15th Ave)	V/C 1.01 → 1.17	Background, 2020-2025	FAILS IN ALL 10 STUDIES

FACILITY	METRIC	CONDITION	STATUS
NE 10th Ave (189th–179th)	V/C 1.33	2028 Background	FAIL
NE 179th St EB (Delfel–I-5)	V/C 1.04–1.06	2028 Background	FAIL
NE 50th Ave (179th–174th)	V/C 1.13	2028 Background	FAIL
NE 15th Ave (179th–174th)	V/C 0.98–0.99	2028 Background	AT LIMIT
NE 15th Ave (199th–179th)	V/C 0.91–1.10	2025–2029 Background	FAIL
NE 179th / NE 50th Ave	LOS F / V/C >1.00	2028 Background PM	FAIL
NE 179th / Delfel Rd	LOS F	Existing (2025) PM	FAIL
NE 179th / NE 15th Ave (roundabout)	V/C >1.00	2028 Background PM	FAIL
NE 159th / NE 72nd Ave	LOS F (existing)	Existing & all future	FAIL
NE 184th / NE 29th Ave	LOS F	2029 Total AM	FAIL
NE 72nd Ave (179th–159th–139th)	V/C 0.94–1.23	Existing through 2025 Bkgd	FAIL
NE Salmon Creek Ave EB (134th–50th)	V/C 1.08	2020 Pre-Development AM	FAIL
NE 139th St WB (I-205–20th Ave)	V/C 0.91–0.94	2020–2028 Background PM	FAIL
NE 139th St WB (20th–23rd Ave)	V/C 1.04–1.05	2023 Background PM	FAIL
NE 10th Ave (149th–139th)	V/C 1.08	2028 Background	FAIL

V/C = volume-to-capacity ratio. The County's concurrency threshold is 0.90. Anything above 0.90 is failing. LOS F = Level of Service F, the worst grade. Sources: 24 developer-commissioned traffic impact studies spanning 2018–2025, prepared by Kittelson & Associates, Lancaster Mobley, Mackenzie, TENW, Charbonneau Engineering, and H. Lee & Associates.

The failures don't stay on 179th. The NE 134th–139th Street corridor between NE 10th and NE 29th Avenues is where corridor residents go for groceries, gas, pharmacies, medical appointments, dentists, and fast food. The roads and intersections serving this commercial district are already failing or at the threshold—and no traffic study for a 179th corridor development is required to analyze or mitigate impacts to these daily destinations.

A note on jurisdiction: The segment of NE 179th Street from approximately NE Delfel Road to NE 15th Avenue—including the I-5 interchange—is state-owned (WSDOT). The County applies its own concurrency standards to this segment in traffic studies, but then disclaims the failing results as outside County jurisdiction. The County cannot have it both ways: either the interchange is within its concurrency system or it isn't.

PROMISES VS. REALITY

Where the infrastructure stands today

When urban holding was lifted in 2019, the County presented a project timeline of 2021–2027 for major corridor improvements. The current reality:

PROJECT	CURRENT SCHEDULE	BUDGET	YEARS PAST DEADLINE
NE 179th at NE 29th Ave Roundabout	2025–2027	\$27.6M	2 years
NE 179th (NE 15th–NE 26th Ave)	2028–2030	\$24.3M	3–5 years
NE 15th Ave (179th–10th Ave)	2028–2030	\$20M	3–5 years
NE Delfel Rd (179th–184th)	2029–2031	\$21.3M	4–6 years
I-5/179th Interchange (WSDOT)	2029–2031	\$86M	4–6 years
NE 179th (NE 29th–NE 50th Ave)	2031–2033	\$23.9M	6–8 years · NOT FUNDED
NE 50th Ave Roundabout	2035+	~\$24M (est.)	10+ years · NOT FUNDED
TOTAL		~\$227M+	2–10+ years late

The NE 179th (NE 29th–NE 50th Ave) segment is the improvement most frequently cited to justify development approvals at the corridor's eastern end. It is not on the County's own "Reasonably Funded Project List."

WHY IT DOESN'T LOOK THAT BAD YET

Your eyes aren't deceiving you

If you drive down 179th Street during the evening commute, you already know it's getting worse. But you might wonder: if the numbers are this bad, why isn't it *worse*? There's a reason—and it's actually the heart of the problem.

When the County approves a development, it **reserves the trips** that development will generate. Those trips are accounted for in the concurrency system as committed—but they're not on the road yet. The houses haven't been built. The families haven't moved in. The cars aren't making their evening commute home.

Over 2,900 housing units have been approved in this corridor since 2018, generating over 25,000 daily vehicle trips. Another 725 units are in the pre-application pipeline. Commercial and industrial developments add another 8,600+ daily trips. WSU Vancouver and other institutions hold reserved trips based on their submitted plans. Combined, approved developments alone account for over 33,000 daily trips on roads that were already at or near capacity.

When those developments build out, the traffic will arrive on roads that still won't be finished. From the first development approvals in 2018 to when the NE 50th/179th roundabout is projected to be complete is **nearly 20 years for 2.5 miles of road**—and that doesn't even include the west side projects.

That's the whole reason concurrency exists—to make sure more development isn't approved than the roads can handle. The system is supposed to prevent the problem *before* it becomes visible, not after. By the time you can see the gridlock from your car window, it's too late. The approvals have been granted. The trips are committed. And the roads to serve them are still years away.

WHAT'S HAPPENING NOW

The Council chose more density. The concurrency code remains broken.

On **April 27, 2026**, the Clark County Council selected Preferred Alternative 2 for the 2025 Comprehensive Plan update—increasing allowable density in the corridor, though less than originally proposed. The County's own travel demand model shows the corridor failing under both alternatives studied. Adoption is targeted for October 2026.

The concurrency code—CCC 40.350.020—was designed to keep development and infrastructure in balance. When a road's volume-to-capacity ratio exceeds 0.90, the code says development should be delayed until the condition is improved or mitigated. That is the standard the County adopted. It is the law.

The County is not following it. Instead of building roads or denying developments that exceed the standard, the County is trying to work around the code—dismissing documented failures using practices that have no basis in the code text, and exploring methodology changes that would make the failures disappear on paper.

On the record — The developer's attorney agrees the practice isn't in the code

At the April 23, 2026 hearing on the 174th Street Subdivision, the developer's attorney conceded that the County's practice of overriding corridor V/C failures with intersection performance is not literally in the code. The Hearing Examiner independently identified the same problem.

22 corridors failing — The developer's own engineer confirms the problem is countywide

The developer's traffic engineer submitted a memorandum identifying 22 corridor segments exceeding the V/C 0.90 standard—all but one concentrated in just two high-growth areas: Salmon Creek/Fairgrounds and SR-503/Brush Prairie. The concurrency system is catching exactly what it was designed to catch.

The response — Now they want to change the code

Rather than invest in infrastructure or apply the concurrency standard as written, the County is moving to change the rules. On June 3, Councilor Glen Yung added an interim concurrency ordinance to the Council agenda — presentation June 10, vote expected June 16. No proposal has been released. Changing the code does not add a single lane or build a single road. It only changes whether the roads pass on paper.

WHAT WE WANT

This isn't anti-growth. It's pro-accountability.

We're asking Clark County to do what it promised and what the law requires:

1. **Build the roads first.** Infrastructure should be built before—or at least alongside—the houses. Not a decade later.
2. **Fix the concurrency system.** Measure real road capacity, not theoretical future capacity for roads that don't exist yet. Use the actual road cross-section, not the Arterial Atlas buildout designation.
3. **Pause approvals until promises are met.** No new development approvals in the corridor until the infrastructure commitments made in 2019 are substantially complete.
4. **Require corridor-wide traffic analysis.** Traffic studies should evaluate the whole corridor—not just the half-mile around each project. Cumulative impacts are the entire point of concurrency.

ABOUT THIS SITE

Who we are

179Gridlock.com is maintained by residents of the NE 179th Street corridor in unincorporated Clark County, Washington. We live here. We drive these roads every day. And we've spent the last several years reading the traffic studies, attending the hearings, and analyzing the County's concurrency system.

This site exists because the public record tells a story that isn't being told anywhere else: Clark County's system for ensuring roads keep pace with development is structurally designed to approve every application, regardless of actual road conditions.

We are not anti-development. We are pro-infrastructure. Build the roads, then build the houses.

Understanding the Numbers

The traffic studies for the 179th corridor are hundreds of pages of technical analysis. This page explains what the key numbers mean, why some of them are misleading, and what the full data actually shows. Everything here is sourced from the eight developer-commissioned traffic studies and Clark County's own concurrency code.

THE BASICS

Two numbers that determine whether development gets approved

Volume-to-Capacity Ratio (V/C)

V/C is the simplest concept in traffic engineering: how much traffic is on the road compared to how much it can handle. A V/C of 0.50 means the road is half full. A V/C of 1.00 means it's at capacity. Anything over 1.00 means more vehicles are trying to use it than it can physically process.

Clark County's threshold is V/C = 0.90. Anything above that is considered failing. That 10% buffer exists because traffic isn't perfectly smooth—small disruptions cascade quickly once a road is near capacity.

The V/C ratio is what the County uses to evaluate road *segments*—stretches of road between intersections. When a traffic study says a segment is "failing," it means the V/C exceeds 0.90.

Level of Service (LOS)

LOS is a letter grade from A to F that measures how long you wait at an intersection. It's based on seconds of delay per vehicle. Think of it like a report card for your commute:

GRADE	WHAT IT MEANS	DELAY (SIGNALIZED)
A	Free flow. Minimal waiting.	≤ 10 seconds
B	Slight delays. Still comfortable.	10–20 seconds
C	Moderate delays. Noticeable congestion.	20–35 seconds
D	Significant delays. Approaching instability.	35–55 seconds
E	At or near capacity. Long waits. The County's minimum standard for unsignalized intersections.	55–80 seconds
F	Gridlock. Demand exceeds capacity. Multiple signal cycles to clear.	> 80 seconds

How V/C and LOS relate—and where they diverge

V/C measures how **full** the road is. LOS measures how **long you wait**. They usually track together—a full road means long waits. But at roundabouts, they can tell completely different stories. That's where the County's system breaks down.

THE ROUNDABOUT PROBLEM

Why an intersection graded "A" can actually be failing

Roundabouts are designed for high throughput with low delay. Traffic flows continuously instead of stopping at a red light. That means even a very busy roundabout can report low average delay—and therefore a good LOS letter grade—while individual approaches are completely overwhelmed.

The reason is simple: **roundabout LOS is a volume-weighted average** across all approaches. If 1,700 vehicles on NE 179th sail through at LOS A, and 700 vehicles trying to enter from the I-5 ramp are stuck at LOS F with 88-second delays, the average comes out to LOS C. The report says "LOS C" and staff use that to conclude the intersection is operating acceptably.

Here's what that actually looks like, using real data from the Three Creeks East traffic study at NE 179th Street and the I-5 NB Ramps, 2028 PM peak hour:

APPROACH	V/C / LOS	DETAIL
I-5 NB Ramps (South)	V/C 1.168 · LOS F	88-second delay · 1,871 ft queue · 2,018 vehicles
NE 179th Street (East)	V/C 0.565 · LOS A	6-second delay · 1,707 vehicles
NE 179th Street (West)	V/C 0.285 · LOS A	4-second delay · 743 vehicles
Overall Intersection	V/C 1.168 · LOS C	30-second average delay · 4,468 total vehicles

What staff report: LOS C — Acceptable, while 2,018 vehicles on the I-5 approach face LOS F with queues backing up a third of a mile.

The 85% design threshold

Engineering practice holds that roundabouts should be designed to operate at or below **85% of their theoretical capacity (V/C 0.85)**. Above that, performance degrades rapidly—small increases in volume produce disproportionate increases in delay, and the roundabout becomes **unreliable**. Several approaches in the corridor studies are already well above this threshold.

Why this matters for concurrency: Clark County staff use intersection-level LOS grades to override failing corridor V/C ratios. This practice has no basis in the County's concurrency code—it is an administrative practice that staff have applied for years without code authorization. When a road segment shows V/C above 0.90, staff check the bounding intersection. If the intersection reports an acceptable LOS letter grade, the segment failure is dismissed. At roundabout intersections, the overall LOS will almost always look acceptable—because the averaging math

guarantees it. The result is that a roundabout designed for a road that doesn't exist yet is used to justify approving development on a road that's already failing.

The same intersection, two different answers

At the I-5 NB Ramps roundabout, the Towhee Creek study found V/C 0.822 and LOS A (passing). The NE 174th Street study—prepared by the same consulting firm, using the same horizon year—found V/C 1.138 and LOS F (failing). The difference: roughly 87 vehicles per hour in background traffic assumptions.

Part of the reason for that difference is that five traffic studies were prepared during the same time period and none of them count each other's traffic. The code requires in-process developments to be included in background assumptions—but it isn't happening. So the 87-vehicle gap isn't just an unexplained discrepancy—it's likely a larger failure than either study shows, because both are missing trips from the other concurrent applications. The system has no mechanism to reconcile these contradictory results, and both studies were used to support development approvals.

THE FULL PICTURE

Every failing road segment and intersection across eight studies

The tables below compile every road segment at V/C 0.80 or above and every intersection at LOS E or worse from all eight developer-commissioned traffic studies in the corridor. These are the numbers the County uses to make concurrency determinations. All conditions shown are **background or existing**—before any new project trips are added.

Road Segments (V/C ≥ 0.80)

SEGMENT	DIR	V/C	CONDITION	STATUS	SOURCE
NE 10th Ave (189th–179th)	NB	1.33	2028 Bkgd	FAIL	Three Creeks East
NE 179th St (I-5 to 15th Ave)	EB	1.17	2028 Bkgd	FAIL	Three Creeks East
NE 179th St (I-5 to 15th Ave)	EB	1.14	2028 Bkgd	FAIL	Four Creeks North
NE 50th Ave (179th–174th)	NB	1.13	2028 Bkgd	FAIL	Three Creeks East
NE 179th St (NB Ramp–12th Ave)	EB	1.12–1.13	2029 Bkgd	FAIL	Ridgefield MS
NE 15th Ave (179th–189th)	NB	1.07–1.08	2029 Bkgd	FAIL	Ridgefield MS
NE 179th St (Delfel–I-5)	EB	1.06	2028 Bkgd	FAIL	Three Creeks East
NE 179th St (Delfel–I-5)	EB	1.04	2028 Bkgd	FAIL	Four Creeks North
NE 10th Ave (199th–194th)	NB	1.01	2028 Bkgd	FAIL	Three Creeks East
NE 179th St (12th–15th Ave)	EB	0.99–1.01	2029 Bkgd	FAIL	Ridgefield MS
NE 15th Ave (179th–174th)	NB	0.99	2028 Bkgd	AT LIMIT	Three Creeks East

SEGMENT	DIR	V/C	CONDITION	STATUS	SOURCE
NE 15th Ave (179th–174th)	NB	0.98	2028 Bkgd	AT LIMIT	Four Creeks North
NE 10th Ave (199th–194th)	NB	0.94–0.97	2029 Bkgd	FAIL	Ridgefield MS
NE 139th St (20th–23rd Ave)	EB	0.94	2028 Bkgd	FAIL	Three Creeks East
NE Delfel Rd (189th–179th)	SB	0.91	2028 Bkgd	FAIL	Three Creeks East
NE 10th Ave (149th–139th)	NB	1.08	2028 Bkgd	FAIL	Towhee Creek
NE 139th St (10th–20th Ave)	EB	0.93	2028 Bkgd	FAIL	Towhee Creek
NE 10th/15th Ave (189th–179th)	NB	0.92	2028 Bkgd	FAIL	Towhee Creek
NE 139th St (20th–23rd Ave)	EB	0.92	2028 Bkgd	FAIL	Towhee Creek

Intersections Failing or Near-Failing

INTERSECTION	PEAK	LOS / V/C	CONDITION	STATUS	SOURCE
NE 179th / Delfel Rd	PM	LOS F	Existing (2025)	FAIL	Three Creeks East
NE 179th / NE 50th Ave	PM	LOS F	2027–2028 Bkgd	FAIL	Kozy Manor & Three Creeks East
NE 184th / NE 29th Ave	AM	LOS F	2029 Total	FAIL	Ridgefield MS
NE 159th / NE 72nd Ave (WB)	PM	LOS F	2028 Bkgd	FAIL	NE 174th Street
I-5 NB Ramps at 179th (SB)	PM	V/C 1.168 / LOS F	2028 Buildout	FAIL	Three Creeks East
NE 179th / NE 15th Ave (EB)	PM	V/C 1.210 / LOS F	2028 Buildout	FAIL	Three Creeks East
NE 179th / NE 50th Ave	AM	LOS E	2028 Bkgd	AT LIMIT	Three Creeks East
NE 179th / Delfel Rd	AM	LOS E	Existing	AT LIMIT	Three Creeks East

All conditions shown are background or existing—before any new project trips are added. "Bkgd" = background conditions (includes approved and in-process developments, plus growth, but not the subject project). Sources: Three Creeks East (Lancaster Mobley, June 2025), Four Creeks North (Lancaster Mobley, April 2025), Kozy Manor Estates (Kittelsohn, Feb 2025), NE 174th Street (Lancaster Mobley, Dec 2025), Towhee Creek (PLS Engineering, Dec 2025), Ridgefield MS (Kittelsohn, June 2024), Mt. Vista Logistics (TENW, Jan 2023), Anderson Dental (Lancaster Mobley, Aug 2025).

WHAT'S MISSING

These numbers are a floor, not a ceiling

Every number in the tables above understates the actual problem. Here's why.

Five studies don't count each other

Five traffic studies were prepared for corridor projects during the same time period. None of them include the traffic from the other four in their background assumptions. The County's code requires in-process developments to be included—but it isn't happening. Hundreds of peak-hour trips loading the same roads simply don't appear in each other's analysis. The same engineer prepared multiple studies using the same horizon year, and none included the others as "in-process" developments. If all concurrent applications were loaded simultaneously, V/C ratios would climb higher and segments currently shown as passing could cross the 0.90 threshold.

At the I-5 NB Ramps, the difference between "passing" and "failing" is 87 vehicles per hour. The missing cumulative trips from the five cross-excluded studies far exceed 87 vehicles.

Distance caps exclude the worst bottlenecks

A project generating fewer than 50 peak-hour trips only has to analyze roads within one mile. Most corridor developments fall into this category. The I-5 interchange—the corridor's biggest constraint—may fall outside that radius entirely. The Salmon Creek commercial district where residents shop, get gas, and see the doctor is also outside the study area for most projects. The GMA contains no geographic limitation on concurrency evaluation. The distance caps are a County-level creation.

Ghost capacity inflates the denominator

When a traffic study calculates V/C for a road segment, the "capacity" number used is based on the road as it's *planned* to exist—not as it exists today. NE 179th Street is physically a two-lane rural road (capacity ~600 vehicles per hour), but the Arterial Atlas designates it as a future multi-lane arterial (capacity 1,800 vehicles per hour). Using 1,800 as the denominator makes the V/C ratio look three times better than the actual road conditions warrant. One consultant—Kittelson, preparing the Kozy Manor study—correctly used the reduced capacity. The others used the inflated number.

Reserved trips aren't on the road yet

WSU Vancouver and commercial developments hold reserved trips under concurrency agreements and submitted plans. These trips are committed capacity—they count against the system's limits—but they're not generating traffic yet. Current traffic counts don't reflect the full committed load. When buildout occurs, the actual conditions will be worse than what current counts suggest.

Bottom line: The failure counts in these tables are the *minimum*. The actual number of failing segments and intersections is higher than what any single traffic study shows, because no single study captures the full cumulative picture. The code requires in-process developments to be

counted. Staff override failing segments using a practice with no code authorization. The result isn't just a system that misses the problem—it's a system that bypasses its own rules to avoid finding one.

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Promises vs. Reality — A Timeline

A chronology of the 179th Street corridor — from 1997 through today. Every entry is sourced from public meeting minutes, County documents, or official records.

1997: THE PROBLEM IS ALREADY KNOWN

February 1997 — County imposes interim holding on 179th and 134th/Salmon Creek areas

County Commissioners adopt an interim urban holding zone for development impacting both the I-5/179th Street interchange and the 134th Street/Salmon Creek area. Transportation issues in this corridor date back to the 1980s. Staff, citizens, and businesses spend the year developing the Salmon Creek Fairgrounds Regional Road Plan covering 8 square miles.

September 1997 — Regional Road Plan adopted, interim holding lifted

The Salmon Creek Fairgrounds Regional Road Plan is adopted, lifting the temporary holding zone. The plan addresses arterial, circulation, and access management issues. The approach: plan first, then allow development. This is the opposite of what happens in 2019.

1999-2007: SALMON CREEK FAILS ANYWAY

January 1999 — WSU Vancouver Development Agreement

Clark County and WSU sign a development agreement (RD 99-08) reserving 1,149 AM and PM peak hour trips for the campus. The agreement has a 27-year term expiring December 31, 2025. WSU contributes \$950,000 for off-site road and intersection improvements. The area is under infrastructure pressure — WSU locks in capacity while it's still available.

2001–2003 — Salmon Creek development moratorium

Despite the 1997 Regional Road Plan, traffic congestion overwhelms the Salmon Creek corridor. The County imposes a moratorium triggered by operating speeds below 13 mph. The moratorium area extends three miles from the I-5 interchange.

2004 & 2007 — 179th corridor brought into Vancouver's Urban Growth Area

Approximately 2,200 acres are added to the UGA. Urban holding overlay applied immediately because transportation infrastructure lacks adequate capacity for urban development. One interchange south, Salmon Creek is still dealing with the consequences of development outpacing infrastructure.

2005–2007 — Second Salmon Creek moratorium

Another moratorium imposed on the Salmon Creek area. Hundreds of projects placed on hold. The \$133 million Salmon Creek Interchange Project (I-5 at NE 139th Street) is the County's answer — but it won't be complete for nearly a decade.

2008: THE WARNING NO ONE HEEDED

November 2008 — WSU agreement amended; staff warns capacity will run out in 10 years

WSU receives 1,267 additional peak hour trips (PW 08-118). The staff report explicitly warns: if Phase 2 of the Salmon Creek Interchange Project does not reach "reasonably funded" status within ten years, "there will not be adequate capacity to serve non-WSUV growth in their area." That ten-year deadline: 2018 — the same year urban holding is lifted.

"If Phase 2 does not reach 'reasonably funded' status in about ten years, then there will not be adequate capacity to serve non-WSUV growth in their area."

— Clark County Staff Report, October 31, 2008

2014: THE RULES CHANGE

August 2014 — Salmon Creek Interchange opens, \$133 million later

The new I-5 interchange at NE 139th Street opens on August 27. It took three moratoria, a decade of construction, and \$133 million to fix what happened when development outpaced infrastructure at Salmon Creek. The County is about to do the same thing one interchange north.

August 2014 — County changes concurrency standards, and lowers the bar

Ordinance 2014-08-09 shifts from travel speed standards to V/C ratios. The entire travel speed table (38 corridor segments) is deleted. The change also lowered Transportation Impact Fees and removed road projects from the 20-year Capital Facilities Plan — the same projects the corridor desperately needs now.

"When we made this change, it dramatically lowered our needed projects and subsequently lowered our TIF rates as a result."

— Matt Herman, Public Works, March 2019

2015–2016: STATE FUNDING

2015–2016 — Connecting Washington funds I-5/179th interchange (\$50M)

State legislature allocates \$50 million for the interchange replacement. Funds won't be available until the 2023–2025 biennium — and that's when design can begin, not construction. In 2016, the County pays WSDOT \$232,000 for practical design guidance to start preliminary work.

2018: WARNINGS IGNORED

September 2018 — Skyview Station TIS: first documented corridor failure

NE Salmon Creek Ave EB at V/C 1.08 and NE 139th St WB at V/C 0.91 under pre-development conditions. Failures documented before urban holding is even lifted.

November 7, 2018 — WSDOT recommends denial of Holt Homes application

In a letter to Community Planning Director Oliver Orjiako regarding CPZ2018-00021 (143 acres, 606 homes + 99 townhomes), WSDOT raises concerns about safety, capacity, and funding. The existing interchange lacks adequate capacity for additional development. Interchange improvements are not anticipated to be operationally functional until 2028 "at the earliest." WSDOT supports the staff recommendation of denial.

"WSDOT supports the staff report recommendation of denial for this proposal."

— Michael A. Williams, WSDOT Planning Manager, to Oliver Orjiako, November 7, 2018. Never disclosed at any subsequent hearing.

December 18, 2018 — Phase 1: Killian Pacific, 526 units approved

40 acres, 200 SF homes + 326 apartments, 402 PM peak trips. Council approves 41 days after WSDOT recommended denial.

2019: THE FLOODGATES OPEN

February 21, 2019 — Phase 2: Holt Homes, 705 units, no road construction plan

143 acres, 606 SF + 99 townhomes, 657 PM peak trips. The developers' own representative confirms there is no actual construction management plan for the County's road projects. Approved 4-0.

"I just wanted to make sure that we weren't misleading you, that there isn't a true construction management plan sitting there."

— Randy Printz, developers' representative, referring to the County's road projects

January–March 2019 — 179th Subcommittee formed to find funding for road projects

The committee's mission: identify funding to build the road projects needed to lift urban holding. Members include 4 developers (Killian, Holt, Hinton, Wollam), 4 developer attorneys, 3 WSDOT staff, city managers from Vancouver, Ridgefield, and Battle Ground, and 17 County staff. One vote per entity. Staff didn't vote. No corridor residents on the committee.

March 13, 2019 — Councilor Julie Olson questions GMA compliance

Olson represents the corridor district. At the Council work session, she challenges the financial framework directly.

"I don't think we're in balance. I don't think we're compliant with GMA. If we have to go through all these machinations and tax every single taxpaying member of this community in order to open this up, I think something's — we either don't have enough development up front or we've got too much capital infrastructure."

— Councilor Julie Olson, March 13, 2019

May 7, 2019 — Subcommittee presentation shows \$23.3M shortfall

Staff's own slides: \$23.3M gap (slide 30), "construction likely beyond 2024 due to WSDOT" (slide 36), additional funding "highly dependent on resolving GMA non-compliance" (slide 13).

July 16, 2019 — Council approves Phase 2 lift

WSDOT denial recommendation not disclosed.

August 20, 2019 — Council adopts \$66.5M funding plan, Lentz votes no

Step 1 only. Step 2 projects (15th–26th and 29th–50th widening) not funded. Sources include grants at 80% probability, future TIF, and bonding. Councilor Temple Lentz dissents, warning the project has tripled in scope without adequate funding.

"What started as a \$66 million project to lift urban holding for four housing developments and a strip of retail, has morphed into \$163 million project that lifts all of urban holding, but we're only talking about how we're going to fund a third of it."

— Councilor Temple Lentz, August 20, 2019. Vote: 4-1. Lentz votes NO.

September 10, 2019 — Open House at Alki Middle School

Over 100 residents attend. County describes a "skinny roads, fat nodes" strategy — improve intersections first, widen roads later. WSDOT tells the public the interchange won't be complete until "sometime in 2030." Full corridor widening described as happening in "the back half of the next decade."

September–October 2019 — Phases 3 & 4: Wollam (325 homes) and Hinton (129 homes)

Combined with Killian and Holt, the four developer agreements cover ~255 acres, 1,685 units, 15,130 daily trips, \$12M in developer commitments.

October 8, 2019 — Planning Commission hearing: scope expands from 4 developments to all 2,200 acres

CPZ2019-00031 proposes lifting urban holding on the entire area — nearly ten times the acreage covered by the four developer agreements. Commissioner Barca dissents 4-1. Staff applies the wrong legal standard, telling the Commission that improvements need to be "reasonably funded" rather than funded to be *completed* within six years.

November 12, 2019 — Full urban holding removal, all 2,200 acres

Council lifts urban holding on the entire area based on a finding that infrastructure is "reasonably funded." But the GMA requires improvements to be completed or financially committed to complete within six years — a standard that was never properly evaluated. WSDOT had already said the interchange wouldn't be functional until 2028 (and told the public 2030). Staff's own slides showed construction going beyond 2024. The legal standard was reframed from "complete within six years" to merely "reasonably funded" — and no one corrected it.

2020: DEVELOPMENT ACCELERATES, INFRASTRUCTURE DOESN'T

February–July 2020 — Five traffic studies: NE 179th already failing at V/C 1.01–1.03

M&H/Hinton, Peterson Machinery, and NE 179th Apartments West & East (all Kittelson) document the corridor failing in background. NE 72nd Ave fails under existing conditions at V/C 0.98–1.06. All credit unbuilt TIP improvements.

May–July 2020 — NE 179th Apartments approved: 283 units despite corridor failures

West (159 units) and East (124 units). Combined 1,540 daily trips. Later renamed "South Ridge." Approved while the corridor is already documented as failing in background conditions.

February 2020 — WSU Vancouver master plan approved, adds residential housing

Hearing Examiner approves WSU's master plan update (PLD-2019-00041) adding undergraduate housing to campus. The 1999 development agreement's 27-year term expired December 31, 2025. The 2008 amendment added trips but did not extend the term.

2021–2022: PLANNING STARTS, YEARS AFTER DEVELOPMENT APPROVED

2021 — Three more studies: failures continue, V/C reaches 1.04

Summit Body (V/C 1.04), Salmon Creek Memory Care (NE 139th WB V/C 0.91), DSHS Behavioral Health (NE 159th/72nd LOS F existing, signal warrants met). DSHS uses zero in-process developments — inconsistent with every other study.

2021–2022 — More developments approved despite documented failures

Trails at Whipple Creek (48 lots), Martin's Meadow (33 lots), Highlands at Whipple Creek (29 lots). All approved while NE 179th EB is failing at V/C 1.01–1.04 and NE 72nd Ave is failing under existing conditions. All rely on the same unbuilt TIP improvements.

June 2022 — Four Creeks South TIS: five segments now failing

NE 179th EB at V/C 1.05 and NE 72nd Ave at V/C 1.09–1.12 in background. Failures worsen with each study.

2023: THE ADMISSION

June 6, 2023 — Council votes 3-2 to rezone commercial land to residential

26.7 acres of Three Creeks North converted from commercial/mixed-use to housing. Employment land reduced.

July 12, 2023 — Public Works Director: six-year timeline was never feasible

Costs have grown from \$66.5M to over \$200M.

"I don't know of anyone who had done projects like these that thought that was possible."

— Ken Lader, Public Works Director

July 18, 2023 — Arterial Atlas amendments finally adopted

The circulation plan is adopted 4 years after development was approved.

August–October 2023 — Legacy Village II (28 units) and South Ridge Central Apts (131 units) approved

Approved while NE 179th EB fails at V/C 1.05 and rising. Infrastructure still unbuilt.

2024: SLIPPAGE CONTINUES**May–November 2024 — Three subdivisions approved despite worsening failures**

Viers PUD (84 lots), Mill Creek Terrace (111 lots), Mountain View Ridge PUD (72 lots). 267 more lots approved while V/C reaches 1.14. All rely on the same unbuilt improvements.

June 2024 — Ridgefield MS TIS: V/C reaches 1.14, highest yet

NE 179th EB at V/C 1.14 for 2029 horizon. Four segments fail in background. Each study worse than the last.

November 6, 2024 — City of Vancouver: more density needed, but also, no jobs nearby

Written testimony on the Comp Plan recommends increased density in the corridor, citing HB 1181 VMT requirements. But the same letter acknowledges VMT reductions are "likely impossible without some allowances for related land uses to locate nearer to each other" — an admission that the corridor lacks the employment land needed to make the density work.

2025: SIX YEARS PASS, NO ROADS**February–December 2025 — Seven more traffic studies, eight segments now failing**

Three Creeks East (200 lots, Lancaster Mobley) documents the worst results: V/C 1.17 on NE 179th EB, V/C 1.33 on NE 10th Ave, eight segments exceeding 0.90. Five studies prepared by the same engineer, none counting each other's traffic. The code requires it; it isn't happening.

March 2025 — Mill Creek Meadows approved (40 lots) despite corridor failures

40-lot subdivision at 4508 NE 174th St approved by Hearing Examiner while eight road segments exceed V/C 0.90.

August 2025 — NE 29th roundabout construction begins

\$27.6M. The first major corridor project — 6 years after urban holding lifted. Originally targeted summer 2023. 2 years late.

October 2025 — Draft EIS published for Comprehensive Plan

County's own model shows corridor failures. DEIS does not identify them as concurrency deficiencies.

November 2025 — Six years pass since urban holding was lifted

The GMA required that infrastructure be completed or financially committed to complete within six years of the concurrency finding. Six years have passed. No major corridor project is complete. Over 2,900 units approved. 33,000+ daily trips committed. 725 more units in the pipeline. The "reasonably funded" finding that justified lifting urban holding has not produced a single finished road project.

2026: APPROVALS CONTINUE**January 6, 2026 — RTC presentation: further slippage**

Brian Muhu shows construction starts pushed to 2029 for some projects. NE 50th roundabout pushed to 2035+.

January–March 2026 — 278 more lots approved despite eight failing road segments

Four Creeks North (39, Jan 21), Kozy Manor (39, Feb 27), Three Creeks East (200, Mar 6). All approved after the six-year mark passed. All rely on the same unbuilt TIP projects. NE 179th EB now at V/C 1.17.

April 8, 2026 — Staff recommends denial of two subdivisions on concurrency grounds

For the first time, County staff recommend denial of the 174th Street Subdivision (100 lots) and Taylor Reserve Subdivision (35 lots) because concurrency standards have not been met. The same planner and concurrency engineer issue both denial recommendations on the same day. Hearing set for April 23.

April 27, 2026 — County Council votes on Comprehensive Plan

The decision that sets density and infrastructure for the next 20 years. Twenty-four traffic studies document the corridor failing. The City of Vancouver wants more density. The roads still aren't built.

WHAT'S AHEAD — FUNDED AND UNFUNDED PROJECTS**2025–2027 — NE 29th Ave Roundabout (under construction)**

\$27.6M. Originally promised summer 2023.

2028–2030 — NE 179th (15th–26th) and NE 15th Ave widening

\$44.3M combined. Originally promised 2023. 3–5 years past deadline.

2029–2031 — I-5/179th Interchange (WSDOT)

\$86M. WSDOT said 2028 in 2018. Has slipped repeatedly. County cannot build or guarantee it.

2031–2033 — NE 179th (29th–50th Ave)

\$23.9M. Not on the Reasonably Funded Project List. 6–8 years past deadline. NOT FUNDED.

2035+ — NE 50th Ave Roundabout

~\$24M. Not funded. Not scheduled. Already LOS F in traffic studies.

Unknown — NW 11th/179th and Delfel–NW 11th widening

Not in any County plan. No timeline. No budget.

From the first approvals in 2018 to when the last funded project finishes is nearly **20 years for 2.5 miles of road** — and that doesn't include the west side projects.

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Land Use Hearings

Where the concurrency code meets real development applications — and where the gap between what the code requires and what the County is doing becomes visible.

Why hearings matter

Clark County's concurrency code — CCC 40.350.020 — requires that roads have adequate capacity before development is approved. When a corridor's volume-to-capacity (V/C) ratio exceeds 0.90, the code says development should not proceed until the condition is improved or mitigated. That's the standard the County adopted. It's in the code.

In practice, the County has not been applying the code as written. Instead, staff have been dismissing corridor V/C failures when the intersections at either end of the failing segment show acceptable levels of service — a practice that has no basis in the code text.

This gap between code and practice has been invisible for years because it happens inside technical staff reports that few people read. The hearings below are where that gap became part of the public record.

Broad agreement that the code means what it says. The applicant's own attorney agreed at the April 23 hearing that the County is not following the code. The Hearing Examiner independently identified the same problem. And in a separate submission, the developer's own traffic engineer identified **22 corridors countywide** that exceed the V/C 0.90 standard — all but one concentrated in just two high-growth areas — confirming that the plain reading of the code reveals a systemic problem, not an isolated one.

There is no serious dispute about what the code says. The question is whether the County will follow it.

ACTIVE PROCEEDINGS

174th Street Subdivision (PLD-2026-00002)

Applicant: Silver Buckle Homes / TimberCrest Homes · **Units:** 100 lots · **Location:** 17101 NE 40th Avenue

A 100-lot residential subdivision at the eastern end of the 179th corridor. The applicant's own developer-commissioned traffic study found multiple corridor segments exceeding the V/C 0.90 standard — including NE 179th Street, NE 10th Avenue, NE 15th Avenue, and NE 50th Avenue — under 2028 background conditions, before the project's traffic is even added.

What happened

On April 8, 2026, County staff recommended **denial** of this subdivision because concurrency standards had not been met. This was the first time staff had recommended denial of a corridor development on concurrency grounds. Both this application and the companion Taylor Reserve Subdivision were later reversed to approval during the hearing process.

At the April 23 hearing before the Hearing Examiner, the concurrency question became the central issue. The County's concurrency engineer was unable to identify a code basis for the practice of dismissing corridor V/C failures based on intersection performance. The applicant's attorney agreed that the County is not following the code, but argued it represents a long-standing interpretation. The Hearing Examiner stated that the code "doesn't say anything about level of service" at bounding intersections and that if the parties believe the code needs changing, that's a matter for the Planning Commission and Board of Commissioners.

Developer outreach to change the code

Within hours of the April 23 hearing, multiple developer-side parties began contacting the County — not to defend the existing practice as lawful, but to change the code. The applicant's attorney emailed County staff the morning after the hearing requesting an interim code amendment. A separate developer attorney submitted letters conceding corridor V/C failures and acknowledging staff have not been applying the code as written. The Ginn Group called for "emergency action." PLS Engineering sent a failing corridors map showing 80% of their 2026 projects affected. The Building Industry Association of Clark County sent a letter to Council requesting an emergency ordinance, citing 29+ projects and 1,500+ units.

Five distinct channels — all conceding the code produces denials as written, all asking to change the rules rather than follow them. Nobody on the development side wrote to say the current code already allows what the County has been doing. They wrote to say: please change the code so it does.

The County's response: Rather than apply the code as written or deny the application, staff indicated they would reverse their recommendation from denial to approval based on a volunteer mitigation letter from the developer. That letter proposes improvements at one intersection — but does not address the corridor V/C failures the Hearing Examiner identified. The reversal would re-apply the same practice the Hearing Examiner questioned.

The 22-corridor finding

On May 11, 2026, the developer's traffic engineer submitted a memorandum into the record identifying 22 corridor segments countywide that exceed the V/C 0.90 standard. All but one are concentrated in just two areas: Salmon Creek/Fairgrounds and SR-503/Brush Prairie — both high-growth corridors where development has outpaced infrastructure investment. The memorandum argued that enforcing the code as written would affect development across the county. But what it actually demonstrates is that the concurrency system is catching exactly the problem it was designed to catch: growth areas where the County has approved development without building adequate infrastructure.

The concurrency code exists for this reason. When roads are failing, the appropriate response is to invest in infrastructure or limit development until capacity exists — not to argue that the standard identifying the failure should be abandoned.

Proceeding timeline

- **April 8, 2026** — Staff recommends denial; first concurrency-based denial in the corridor (later reversed).
- **April 23, 2026** — Hearing before Examiner Joe Turner; concurrency engineer unable to cite code basis for override practice; applicant's attorney agrees County not following code; record held open.
- **April 24 - May 13, 2026** — Five developer-side parties contact County asking to change the code rather than follow it.
- **May 11, 2026** — Developer's engineer submits memo identifying 22 failing corridors countywide.
- **June 4, 2026** — Response deadline.
- **June 25, 2026** — Decision expected.

Heartwood North (PLD-2025-00114)

Applicant: Holt Homes · **Units:** 146 lots · **Location:** South of NE 119th Street, Brush Prairie

A 146-lot subdivision on 33 acres in the SR-503/Brush Prairie area — one of the two high-growth areas where the developer's own traffic engineer identified failing corridors. The concurrency staff report uses the same intersection LOS override methodology at issue in the 174th Street proceeding, but formalizes it into detailed boilerplate language citing CCC 40.350.020(F)(9).

Why this matters

This case is assigned to Hearing Examiner Daniel Kearns — not Joe Turner, who questioned the override methodology at the April 23 hearing. The concurrency staff report applies the same practice Turner identified as lacking code basis, now written up as standard operating procedure. Both hearing examiners are expected to issue findings around June 25.

The timing matters. The Council is expected to vote on an interim concurrency ordinance on June 16 — before either hearing examiner issues findings. If the Council changes the code before the examiners rule, the hearings become moot. The code that flagged the problem would be rewritten before the process designed to test it reaches a conclusion.

Proceeding timeline

- **June 11, 2026, 6:00 PM** — Public hearing via Webex before Hearing Examiner Daniel Kearns.
- **June 18, 2026** — Record closes for written testimony (5:00 PM).
- **June 25, 2026** — Heartwood North decision expected from Examiner Kearns.

To testify: contact CommDevOALandUse@clark.wa.gov or 564-397-4911 by noon on June 11.
Written testimony: developmentcomments@clark.wa.gov (reference Heartwood North, PLD-2025-00114).

THE PATTERN

A pattern across multiple corridors

The 174th Street Subdivision and Heartwood North are not isolated cases. They are the most visible examples of a pattern that has played out across development applications in multiple corridors:

Developer-commissioned traffic studies document corridor segments exceeding V/C 0.90. Staff dismiss the failures using a practice — the intersection LOS override — that has no basis in the adopted code. Development is approved. Roads remain unbuilt. And the corridors get worse.

What makes these proceedings different is that the practice is finally being examined on the record. In the 174th Street hearing, the concurrency engineer could not defend it. The developer's attorney conceded it is not in the code. The Hearing Examiner identified the same problem independently. And the developer's own traffic engineer confirmed, in a separate submission, that the issue extends to 22 corridors countywide — concentrated in exactly two areas: Salmon Creek/Fairgrounds and SR-503/Brush Prairie. Heartwood North is in one of those two areas.

The code says the County should either build the roads or not approve the development. The County is choosing to do neither — and that is not what the code authorizes.



5/11/2026

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



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

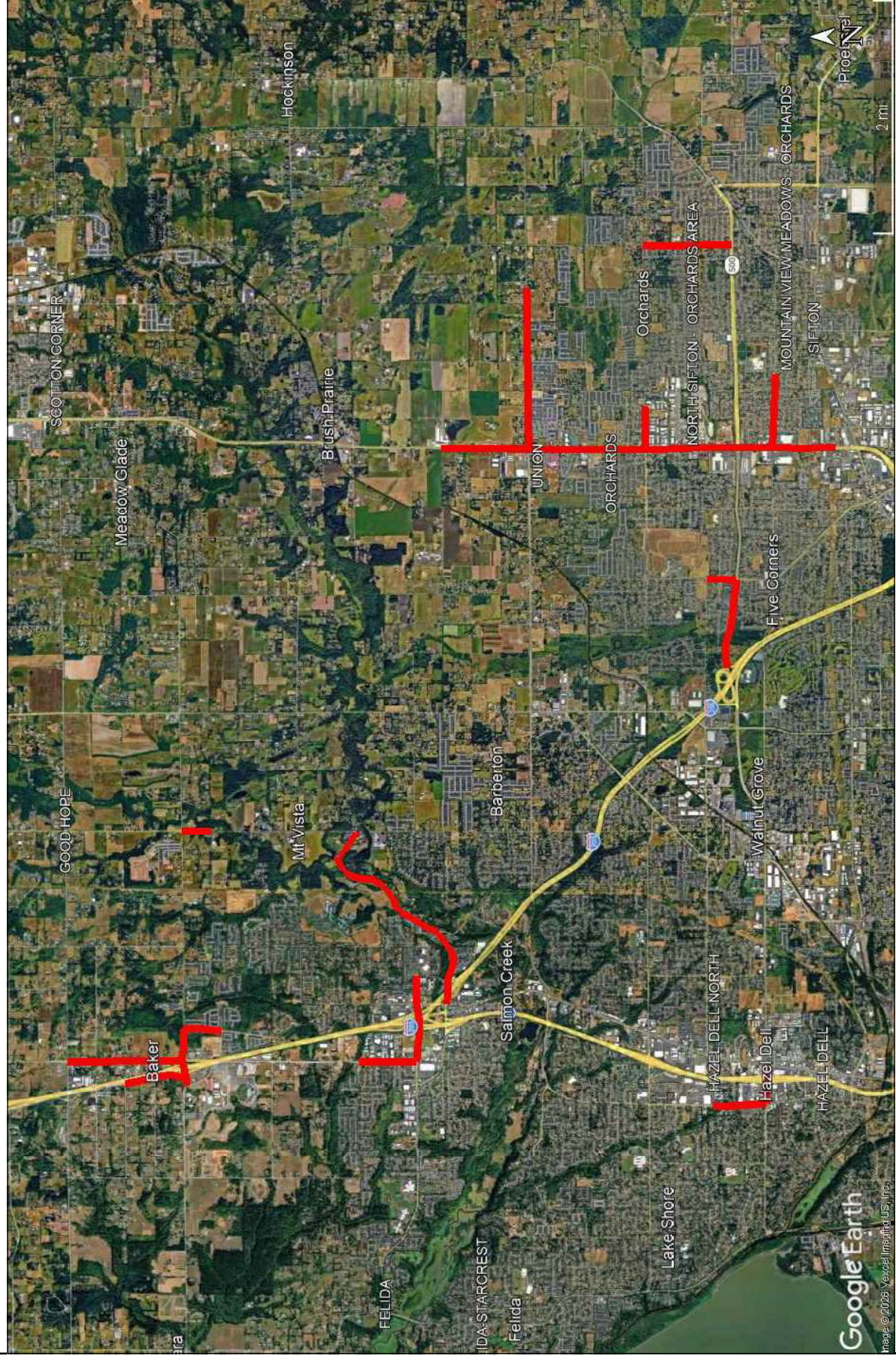
Roadway Name	Classification	Single Direction Capacity/Hour	Between	V/C Ratio	Peak Hour	
					AM	PM
NE/NW 179th Street	Pr-4cb	1800	NE Delfel Road to NE 15th Avenue	0.923 to 1.173		X
NE 139th Street	C-2cb	900	NE 20th Avenue to NE 23rd Avenue	0.917 to 1.24		X
NE 139th Street	M-4cb	1800	NE 10th Avenue to 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



VANCOUVER URBAN GROWTH AREA
CLARK COUNTY, WASHINGTON

FAILING CORRIDOR MAP

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:

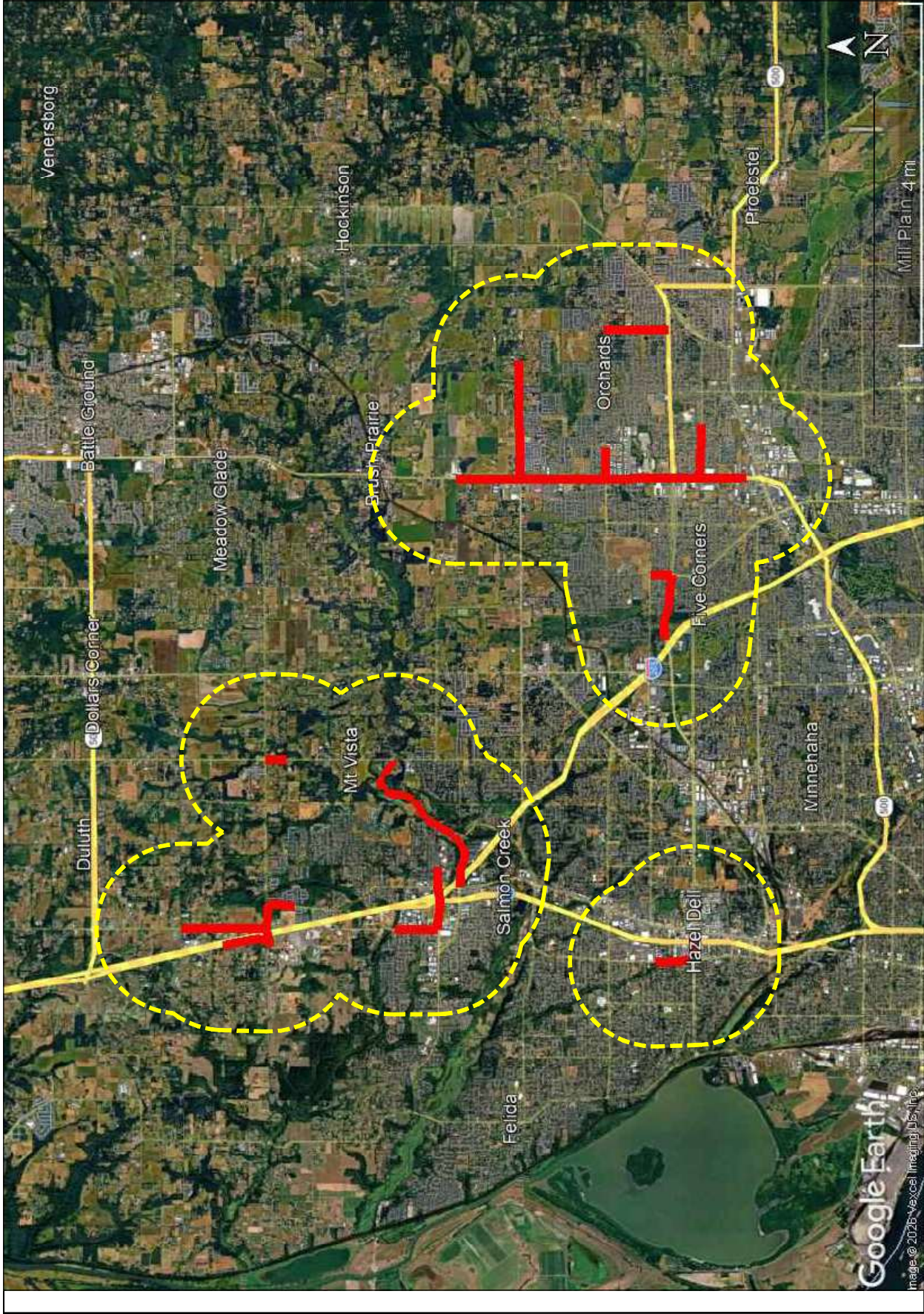
- Eleven (11) or more single-family detached houses.
- A 19-unit apartment building.
- Any elementary, middle, or high school which enrolls 14-19 or more students.
- General retail buildings/space of approximately 2,700 square feet or larger.
- Most restaurants or food vendors that are greater than approximately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



FALLING 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
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- SGA Engineering
- Sterling Design