From: Jeffrey Delapena
To: hcpheidi@yahoo.com
Cc: Oliver Orjiako; Jose Alvarez
Subject: FW: RTC model comments for the Comp Plan
Date: Thursday, August 20, 2026 8:56:00 AM
Attachments: Comments_RTC_Model_and_Comp_Plan_Aug2026.pdf

Good day, Heidi,

Thank you for submitting comments ahead of tonight's Public Hearing for the 2025 Comprehensive Plan Update.

These comments will be added to the Index of Record and brought to the attention of the Planning Commission.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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-----Original Message-----
From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Wednesday, August 19, 2026 5:00 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: RTC model comments for the 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 Jeff,

Please find attached my comments on the RTC model for the Comp Plan.

Thank you,

Heidi

To: Clark County Council and Planning Commission

From: Heidi Pozzo

Date: August 19, 2026

Re: The RTC travel demand model does not reflect what the Comprehensive Plan Update commits to build

The Comprehensive Plan Update has to show that the transportation system can serve the growth it allocates. The RTC travel demand model is the analysis offered for that. It does not reflect what the Comprehensive Plan Update commits to build.

The model builds a county arterial that Appendix A deleted, and used it to remove two failing intersections from the published results. It does not contain the thirteen roundabouts the county adopted for the NE 179th Street corridor in 2023, and has no way to represent one. It carries 14 percent more trips than the network it assumes was built to serve. And it cannot measure intersections at all — RTC and the DEIS consultant have both confirmed in writing that it produced no intersection performance data and does not show traffic backing up, which leaves two of the three level of service standards in Chapter 5 with no data behind them.

The traffic studies the county requires before approving development find roads failing by 2028 that the Final EIS does not list as deficient in 2045, with the planned improvements assumed in both.

Because the model does not represent the planned system, it cannot demonstrate that the planned system serves the planned growth.

1. The model builds a road the county deleted from the Comprehensive Plan

The Final EIS says its street segment analysis assumes the Ridgefield/I-5 South connector is complete — a new arterial from NW Hillhurst Road and NW 31st Avenue east to the I-5 interchange at NE 219th Street, carrying 6,500 to 7,500 vehicles a day by 2045.

Appendix A deletes it. Under “Removed Existing Capital Facilities Plan Projects — WSDOT Projects,” the list includes NW 219th St, NW 31st Ave to I-5 NB Ramps. That is the same road, and the county had a project for it until this update removed it.

It is not a state highway. Chapter 5 states that SR-502 begins at the I-5 interchange at NE 219th Street and runs 6.12 miles east to Battle Ground. The deleted segment runs west from the freeway ramps. It is a county road on unincorporated county land, deleted under a heading for state projects.

Deleting it did not remove it from the analysis. The model still builds it, and the county used it to take two failing intersections out of the published results. The intersection screening workbook records the reason:

Node	Intersection	Why it was dropped
303	SR 502 and the I-5 northbound off-ramp	RTP project assumed (Ridgefield I-5 South Connector)
304	SR 502 and the I-5 southbound off-ramp	RTP project assumed (Ridgefield I-5 South Connector)

Elsewhere the plan says the same interchange has problems. Appendix A lists SR 502 westbound from NE 10th Avenue to the northbound off ramp, SR 502 between the two ramps, and the northbound off-ramp itself as needing capacity improvements.

Ridgefield having a project does not fill the gap. RTC confirms the city has a project in the regional plan to connect Hillhurst Road to the 219th Street interchange, and that it is in the model network. But the road crosses unincorporated county. Chapter 5 counts a road toward concurrency only if it is in the county's capital facilities plan, and impact fees are calculated from that same list. A city project cannot do either. The county needs its own project, with a cost and a schedule, and the Comprehensive Plan Update does not have one.

Final EIS (July 24, 2026) p. 134; Appendix A pp. 11 and 32; Chapter 5 pp. 24 and 66; RTC_Intersections_v10.xlsx, PossibleDeficiencies sheet; county responses of March 2026.

2. The model cannot measure intersections

Chapter 5 adopts three level of service standards for vehicles. One measures how full a road segment is. The other two are measured in seconds of delay at intersections, counted by turning movement.

The Final EIS describes what was done instead. Intersections were tested against a traffic signal warrant from the federal traffic control manual, using 2045 afternoon peak hour volumes from the RTC model. The same passage states that the analysis did not look at turning movements, did not evaluate any signalized intersection or roundabout, and left out any intersection that already had a project attached to it in the county's six-year program or the regional plan.

A signal warrant answers one question: should a signal be considered here. It gives a yes or a no. It does not produce seconds of delay or a level of service letter, and it says nothing about a roundabout.

Three statements in the record confirm the limit. Describing the draft EIS, the DEIS consultant stated that the intersection analysis was a planning-level application of volume-based signal warrants and that the RTC model outputs did not include intersection-level volume-to-capacity forecasts. RTC described a property of the model itself: when demand exceeds capacity the excess does not queue or spill onto the next road, and a congested off-ramp does not back up onto the arterial it feeds. And on October 24, 2025, when county staff asked whether an intersection in a published table was correctly identified, RTC replied that it had provided road-level output but no data for any list of intersections.

The Preferred Alternative model file shows the same thing from the other direction. In the entire county, 32 road links reach a volume-to-capacity ratio of 0.90 or higher and 7 exceed 1.00, and one of those seven — running 19 percent over capacity — reports no delay at all.

The county's standard for roads is a volume-to-capacity ratio of 0.90, and the Final EIS states that segment deficiencies were identified from model links exceeding it. The model file contains 32 road links at or above 0.90. Table 76 of the Final EIS publishes 17 segments. The highest ratio published is 1.044, and four links in the file exceed that, the worst at 1.246.

The plan tested one of its three standards. For the other two, there was never any data.

Chapter 5; Final EIS pp. 132–133 and Table 74; Preferred Alternative model link file; county responses of March 2026; county–RTC correspondence, October 24, 2025.

3. Intersection problems were identified and then dropped

Three different lists of problem intersections exist in the record, and nothing in the Comprehensive Plan Update explains how they relate:

Where	What it says
Final EIS, Table 75	Four intersections — three under No Action, one more under the Preferred Alternative.
Appendix A, p. 4	Twelve intersections that may need signals or other work, plus seven dropped from the twenty-year list.
Screening workbook	Twenty-four screened. Five set aside as model artifacts. Seven dropped because a regional plan project was assumed. One dropped because a signal had been installed.

Some were dropped because a project was assumed. NE 10th Avenue at NE 164th Street is the clearest case. The workbook flagged it as failing under the recommended alternative and its near twin, and the consultant's note read that it was connected to a project "but not necessarily included." Asked about it in March, the DEIS consultant explained that because the intersection sits within a six-year program project, it was deemed unlikely to still be a problem in 2045. County staff confirmed that project's preliminary engineering is scheduled for 2030. A failure identified under the recommended alternative was set aside on the expectation that a road project not yet designed would fix it. The intersection does not appear in the Final EIS.

Others were flagged and never appeared anywhere. Two intersections were marked as failing under all three alternatives, marked as having no project in either the six-year program or the regional plan, and annotated "possible signal/roundabout":

- NE 72nd Avenue at NE 109th Street
- NE Saint Johns Road at NE 109th Street

Neither is in the Final EIS. Neither is in Appendix A's list. They were identified as problems with no plan to fix them, and then were not carried forward.

Final EIS Table 75; Appendix A p. 4; RTC_Intersections_v10.xlsx, PossibleDeficiencies sheet; county responses of March 2026.

4. The forecast is 14 percent above the network it assumes

The 2024 Regional Transportation Plan is financially constrained. Its project list can only include what the region can reasonably afford to build by 2045, so its trip forecast is the amount of travel the region has committed to being able to serve. Chapter 5 says the RTC model network assumes the projects on that plan's lists. The network in the model is the affordable network. The traffic put on it is not.

	Daily person trips	Above the regional plan
2020, actual	1,636,982	—
2025, estimated	1,777,718	—
2045 regional plan, constrained	2,340,662	—

	Daily person trips	Above the regional plan
Preferred Alternative	2,670,955	330,293 (14.1%)

The road network barely grows. The same worksheet shows the 2020 network with 692.7 lane miles of freeway and principal arterial and the 2045 affordable network with 701.4 — an increase of 8.7 lane miles, or 1.3 percent, against trip growth of 43 percent under the regional plan alone.

Chapter 5 reports 2.67 to 2.69 million weekday trips by 2045. The constrained figure of 2,340,662 sits in the same row of the same worksheet and does not appear in the Comprehensive Plan Update. Asked about the difference in March, the DEIS consultant answered that a direct comparison between the plan's trip forecasts and the regional plan's constrained forecasts was not executed. That answer describes the draft EIS; the Final EIS does not report the comparison either.

RTC_Trip_Generation.xlsx and ORWA_trips_8dist_MS_Summary.xlsx; Final EIS Table 74; Chapter 5; county responses of March 2026.

5. The 179th Street corridor design is not in the model

The county settled the design of this corridor in 2023. The 179th Street Access Management and Circulation Plan provides for thirteen roundabouts — eleven along 179th between NW 11th Avenue and NE 50th Avenue, and two at the I-5 ramps to be built by the state. Appendix A cites that plan, and so does the capital facilities project list.

Appendix A does not carry them consistently. Eight appear as their own projects, with roundabout named as the intersection type, at costs from $4,650,000 to $27,596,000. Two exist only as a sentence inside a road project — one at Delfel Road, one at NE 15th Avenue — with no line of their own, no cost and no priority. Three more are described inside the NW 179th Street widening project and also appear separately: that project is estimated at $12,000,000, while the three separate roundabout projects total $14,100,000. You cannot get the same number twice from the plan's own tables. The impact fee update settles it one way, pricing the eight and folding the other two into road projects.

The model contains none of them, and cannot. Roads in the network are assigned one of two delay formulas, for signalized or unsignalized intersections. There is no roundabout formula in the network at all. A corridor the county has committed to build as a chain of roundabouts is modeled as though it were not.

The result is a corridor that reports almost no congestion in a model with no way to represent the form the county has committed to build.

179th Street Access Management and Circulation Plan (July 2023); Appendix A pp. 5, 17–18, 20–21; transportation impact fee update (August 2026); Preferred Alternative model link file.

6. The traffic studies the county approves find failures the plan does not report

The county requires a traffic study before it approves a development, prepared with software built to analyze intersections and roundabouts. The study prepared for the NE 174th Street Subdivision in December 2025, which the county accepted, found six roadway segments over the county standard by 2028 and level of service F at a ramp terminal roundabout.

Location named in the approved study	2028 PM peak	In Final EIS Table 76?
NE 179th St, I-5 to NE 15th Ave	v/c 1.149	No
NE 179th St, NE Delfel Rd to I-5	v/c 1.047	No
NE 10th Ave, NE 189th to NE 179th St	v/c 1.334	No
NE 10th Ave, NE 199th to NE 194th St	v/c 1.003	No
NE 15th Ave, NE 179th to NE 174th St	v/c 0.979	No
NE 134th St, NE 20th to NE 23rd Ave	v/c 0.871	No
NE 179th St at the I-5 northbound ramps	74.6 sec, LOS F on the critical movement; 51.2 sec, LOS D for the approach	No

Table 76 lists seventeen segments expected to exceed the county standard in 2045. None of these locations is among them. The standard is the same 0.90 in both documents, and the 2028 figures already assume the planned improvements are built — so this is not a study looking at today against a plan looking at a finished network. Both assume the improvements, and they reach opposite conclusions about the same roads, with the study reaching its conclusion seventeen years earlier.

One likely reason is averaging. The Final EIS states that the RTC model calculates aggregate volumes on local streets, and that its forecasts on local streets often represent combined travel demand for several routes. RTC describes it as a macroscopic tool for regional forecasting, not an operational one. A model that spreads traffic across an averaged network, over an averaged hour, against generic capacity will not show the peak conditions a study of a single intersection is built to find.

The record does not show the two being reconciled. The DEIS consultant stated in March that comparing the RTC model's methods, assumptions and results to individual corridor studies was not part of the draft EIS. RTC said it could not speak to the comparison because it did not do that work, and suggested that a study finding failure without improvements would likely show acceptable conditions with them — but this study already includes the improvements.

This matters directly for concurrency. Development is approved or denied against these standards. The county approves the site studies and adopts the model results, and the two do not agree about whether these roads work.

NE 174th Street Subdivision Transportation Impact Study, Lancaster Mobley, December 4, 2025, Tables 6 and 8 and Appendix F; Final EIS Table 76 and pp. 133–135; county responses of March 2026.

7. Different land use, nearly the same traffic

Comparing the Alternative 1 link file to the Preferred Alternative link file, 9,528 of 10,851 roads carry identical daily traffic — 88 percent of the network. The two alternatives were built on different housing and employment inputs.

The same pattern appeared in the draft EIS, where Alternatives 2 and 3 carried identical daily traffic on every road in the network. Asked about it, county staff answered that the outputs are not identical and there is no error, and the DEIS consultant explained that the published summary table reports afternoon peak hour figures rather than daily ones. That explains why the summary differs. It does not explain the daily numbers.

If land use changes of this scale move traffic on only 12 percent of the road network, the model is not distinguishing between the alternatives in a way that would let the Council compare them.

Alternative 1 and Preferred Alternative model link files; county responses of March 2026.

What this means for adoption

The Growth Management Act requires the Comprehensive Plan Update to show that transportation facilities are adequate to serve the development it allocates. Every finding above bears on whether that showing has been made:

- The network analyzed includes a county arterial the plan deleted, and two failing intersections were removed from the published results on the strength of it.
- Two of the three adopted level of service standards have no data behind them, because the model does not produce intersection performance.
- Intersections identified as failing were dropped on assumed projects or were not carried forward at all.
- The forecast places 14 percent more trips on the network than the constrained regional plan it assumes was built to serve.
- The corridor design the county adopted in 2023 is not in the model, and the model has no way to represent it.
- Six roadway segments and a ramp terminal that the county's own approved traffic study finds failing by 2028 appear nowhere in the Final EIS list of 2045 deficiencies.

The county also planned to calculate what it would cost to maintain level of service D and did not. The draft EIS instead offers lowering the level of service standard where funding is not available. That is a choice the Council can make, but it should be made openly rather than arrived at because the analysis could not answer the question.

This analysis is based on the RTC model files and related documents provided by the county. Questions submitted to the Regional Transportation Council in July about how certain model fields are constructed remain unanswered.

I ask that the transportation analysis be reconciled with what the Comprehensive Plan Update commits to build before the plan is adopted.