From: Jeffrey Delapena
To: "Heidi Pozzo"
Cc: Oliver Orjiako; Jose Alvarez
Subject: RE: Comp Plan submission: 2011 Concurrency manual
Date: Thursday, September 3, 2026 3:33:00 PM

Good day, Heidi,

Thank you for your comments. These will be entered into the Comprehensive Plan Index of Record and forwarded to members of the Planning Commission.

Best,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

-----Original Message-----
From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Thursday, September 3, 2026 3:16 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: Comp Plan submission: 2011 Concurrency manual

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 the most recent concurrency manual, which is from 2011. Please enter to the Comp Plan index of record.

Thank you,

Heidi

From: **PDR Request System Clark County** clarkcountywa@mycusthelp.net
Subject: Public Records Request :: P057715-071426
Date: July 14, 2026 at 8:44 AM
To: hcpheidi@yahoo.com

--- Please respond above this line ---

Re: Your request for records: **P057715-071426**

Dear Heidi Pozzo:

I understand your request to be for a copy of the most recent concurrency manual if there has been an update published since 2011.

The 2011 Administrative Manual was the last one finalized/published. We have made a diligent and good-faith effort to locate any records that are responsive to your request. No records have been located within the Public Works office. If you still believe that records exist, please provide further details or description of the records you are seeking, and we will make every effort to locate them. At this time, I will be closing this request. This completes your request for public records.

Use this link to view your request: https://www.clark.wa.gov/councilors/public-records-request.

Notice: This request is considered closed. You were not provided with any records that were identified as responsive to your request, and there are not any additional known responsive documents to provide. There have been no updated to the concurrency manual since 2011 Please be aware that there is a one-year statute of limitations for judicial review of this request, and that has started to run as of the date of this letter because there are not any additional known records to provide. You may ask follow-up questions regarding our responses to your request within the next 14 days by responding to this email. Your request for clarification does not mean you will automatically receive additional records.

If you have any questions, please contact me.

Respectfully,

Nicole Davis
Program Coordinator
PUBLIC WORKS

To track or update this request click here: Public Records Portal

From:	David Jardin
To:	April Furth
Cc:	Jeremy Provenzola
Subject:	Information As Requested
Date:	Thursday, April 30, 2026 10:55:41 AM
Attachments:	March 2011 - Administrative Manual.pdf

Good morning.

As requested, here is the outdated version of the Concurrency Administrative Manual.

David Jardin
Traffic Engineering Section Manager
Clark County Public Works

Desk: 564.397.4354
Cell: 360.977.8161

Clark County Concurrency

Administrative Manual

March 2011

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Introduction

"Concurrency" is the requirement that the public infrastructure needed to serve new development, such as roads, sewers, and schools, be in place or funded before those new developments are approved. For transportation, this requires that the impact of each proposed development be checked to ensure there is adequate capacity available on the public road system to serve the new traffic. In the event there is not, the development must be denied or the developer can elect to make improvements to add capacity to the road system.

Clark County Concurrency Program

The Concurrency Ordinance (CCC40.350.020), presently in effect in Clark County, was adopted with the Clark County Code Title 40 in December 2006, and implements the requirements of RCW 36.70A.070. The program framework and level-of-service standards established by this ordinance were first identified in the Clark County Growth Management Plan adopted in December 1994.

Under the Concurrency Program, all development applications for subdivisions, short-plats, conditional use permits, and site plan reviews are tested for transportation concurrency.

As part of the Concurrency Test, the estimated traffic from a proposed development, **plus** existing traffic on the road system, **plus** the estimated traffic from other new and approved developments (not yet built), is added and modeled to estimate the levels-of-service (LOS) that would result after the proposed development, this estimated LOS is called the "operating level". These estimates are then compared with the LOS standards established for that area of the County. If the estimated LOS resulting from the proposed development is less congested than the standard, then the Concurrency Test is passed. However, if the estimated LOS is more congested than the standard, then the development is considered to fail the Concurrency Test. Under these conditions, the development is either denied or the developer can elect to make improvements to add capacity such that the intersection(s) or roadway corridor(s) do not fail the Concurrency Test.

Four key principles, included and considered in the County's Concurrency Program are:

1) Designated "Concurrency Corridors" and "Intersections of Regional Significance" are tested for Concurrency ;
2) Both County and some state-owned intersections are tested for Concurrency;
3) Any peak traffic period during the day can be tested for Concurrency (e.g. AM, PM)
4) The added traffic capacity resulting from a future improvement project can be considered available if the project is considered "reasonably funded" and if the future County project is scheduled for completion of construction within six (6) years.

Note that under Clark County's program, no advanced reservation of capacity can be made either at the time of the Pre-Application Conference or any other time prior to the Concurrency Test. Also, the County does not issue Certificates of Concurrency.

Level-of-Service (LOS) Standards

The LOS standards used by Clark County have been defined in the Highway Capacity Manual (published by the Transportation Research Board) and range from LOS "A" to LOS "F". Level A represents the most uncongested condition possible with little or no delay at intersections and unrestricted travel movements on roadway segments. Level F represents highly congested conditions (approaching gridlock) with average delays at intersections of greater than 60 seconds and stop-and-go travel movements on roadway segments. The LOS standards currently in effect in Clark County are defined in greater detail in the Concurrency Ordinance (CCC40.350.020 (G)).

Concurrency Testing
A general description of the process used by applicants and County staff in testing Concurrency is as follows:

Step 1 - Scoping. Based on a review of the pre-application material and other traffic information, Clark County staff will identify the type of traffic report required: traffic profile, traffic impact study (TIS) or concurrency survey and any special requests of data to be included. If a TIS or concurrency survey is required the concurrency study area shall be established as follows:

- 50 or less new peak hour trips; one mile from site
- 51-250 new peak hour trips; two miles form the site
- 251 or more new peak hour trips; three miles from the site

Step 2 – Concurrency Submittal. As part of the development review application, applicants prepare and submit to Clark County the identified traffic report for the proposed development. The TIS must be prepared and stamped by a Professional Engineer licensed to practice in the State of Washington.

Step 3 - Fully Complete Determination. Clark County staff reviews the submitted application, to determine if the application is fully complete for concurrency. If complete, the number of vehicle trips identified in the traffic report for the proposed development, are initially reserved in our concurrency database (as of the concurrency vesting date).

Step 4 - Review of Transportation Impact Study. When the total development review application is deemed fully complete, Clark County staff begins the technical review of the submitted traffic materials for accuracy and consistency with County standards and practices. County has developed a computerized model for testing concurrency. Traffic study data is input into the model when applicable. Clark County has developed two computerized concurrency models for use in analyzing intersection and corridor level-of-service. These models are maintained by outside transportation consultants. The models utilize the TRAFFIX Transportation Analysis software.

Step 5 - Concurrency Testing. Using the data included as part of the applicant's traffic report and the results of any concurrency modeling, County staff reviews the extent to which the proposed development complies with the LOS standards. Developments that cause an intersection to exceed delay standards or a corridor to fall below travel speed standards are considered to "fail" Concurrency. Under these circumstances, the proposed development is either denied or the developer can elect to mitigate the impacts of the proposed development by making improvements to add capacity such that the intersection(s) or corridor(s) operates within the outlined acceptable Clark County standards.

Step 6 - Determine Mitigation (if required). If a proposed development causes or worsens the failure of an intersection or corridor the applicant must identify, volunteer, and commit to mitigation to gain conditional approval. The applicant is required to submit a written proposal that defines the mitigation (i.e. proposed improvement). The applicant must substantiate that the mitigation will remedy the problem and restore the intersection or corridor delays to an acceptable level-of-service.

Step 7 - Review of Proposed Mitigation. Following submittal of the proposed mitigation by the applicant, County staff reviews the proposed mitigation to ensure that the planned remedy will restore the level-of-service and is consistent with Clark County standards and practices.

Step 8 - Approval or Denial of Application. Following the seven-step process outlined above and if a development application passes the Concurrency Test, Clark County Transportation staff will recommend concurrency approval of the application to the County planner assigned to the development application. In the event the proposed development fails the Concurrency Test and no mitigation is identified to remedy the failing level-of-service, Transportation staff will recommend denial of the application.

Types of Concurrency Reports

Traffic Profile

The concurrency ordinance requires that any development generating 1 or more new trips be subject to concurrency review. A traffic profile shall be prepared for developments with less than 10 new trips. The profile shall be prepared by the applicant, or the applicant's traffic consultant. Concurrency Staff may request additional information for review in determining development impact on surrounding road network.

- General Information
  - Vicinity map (2 mile radius – Minimum)
  - Site plan (8 ½ " x 11")
- Development Information
  - Development Name
  - Pre Application Conference Number (If known)
  - Estimated Date of Build-Out or Full Occupancy
  - Site Summary
    - Describe development, include number of lots, number of units, etc
    - Description of existing structures to remain/be replaced and associated square footages

Traffic Impact Study

Any development generating 10 or more new trips is required to complete a traffic impact study. A general outline is provided in this manual as well as a clarification of the requirements and policy issues. The concurrency study analysis area shall be based on the following:

- 50 or less new peak hour trips; one mile from site
- 51-250 new peak hour trips; two miles form the site
- 251 or more new peak hour trips; three miles from the site

The traffic impact study shall also include, but is not limited to, the following information:

- General Information
  - Site summary
    - Describe development, include number of lots, number of units, etc
    - Description of existing structures to remain/be replaced and associated square footages
  - Vicinity map (2 mile radius – Minimum)
  - Site plan (8 ½ " x 11")
- Site Access(es)
  - Roadway classification(s), descriptions serving site.
  - Sight distance
  - LOS analysis for accesses; existing and at build-out
  - Evaluation of need for right or left turn lanes, storage capacity, and length
  - Accident analysis where applicable
- Trip Generation
  - ADT
  - AM
  - PM
  - Other peak hour trips generated by the site
- Trip Distribution/Assignment
  - Flow diagrams showing the distribution within study area
  - State assumption/documentation used for the trip distribution
  - Site generated turning movements at subject intersections
- Roadway Information
  - Speed limit
  - Classification
  - Intersection Geometry at subject intersections
  - Traffic counts at study intersections within 1 year for peak hour of adjacent street
- LOS Analysis at Concurrency study intersections
  - Existing level of service
  - Existing plus in-process plus projected background growth LOS
  - Existing plus in-process plus projected background growth plus site build-out LOS
- Warrants/Safety Analysis
  - Traffic Signal MUTCD warrant analysis at unsignalized intersections operating at an LOS E/F with, or without the proposed development, as required
  - Evaluation of need for right or left turn lanes, storage capacity, and length
  - Accident analysis with rate calculations and methodology
- Improvement/mitigation Recommendations
  - Identification of possible corrections of any LOS deficiencies
  - Identification of possible corrections of any warrant/safety deficiencies
- Technical appendix

Concurrency Survey (for an exempted development)

The concurrency ordinance exempts some uses from concurrency evaluation; however, a concurrency survey will be required to account for such development and to identify any safety issues. The concurrency survey outline required from the applicant is outlined in this manual.

- General Information
  - Describe the basis for exemption
  - Site summary
    - Describe development, include number of lots, number of units, etc
    - Description of existing structures to remain/be replaced and associated square footages
  - Vicinity map (2 mile radius – Minimum)
  - Site plan (8 ½ " x 11")
- Site Access(es)
  - Roadway classification(s), descriptions serving site.
  - Sight distance
  - LOS analysis for accesses; existing and at build-out
  - Evaluation of need for right or left turn lanes, storage capacity, and length
  - Accident analysis where applicable
- Trip Generation
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  - Flow diagrams showing the distribution within study area
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  - Existing plus in-process plus projected background growth plus site build-out LOS
- Warrants/Safety Analysis
  - Traffic Signal MUTCD warrant analysis at unsignalized intersections operating at an LOS E/F with, or without the proposed development, as required
  - Evaluation of need for right or left turn lanes, storage capacity, and length
  - Accident analysis with rate calculations and methodology
- Improvement/mitigation Recommendations
  - Identification of possible corrections of any warrant/safety deficiencies
- Technical appendix

Review Guidelines for Traffic Reports

General Information

- Current Washington PE stamp and signature is present.
- A qualification statement showing transportation/traffic expertise may be requested from staff.
- Vicinity Map showing the location of the site and include at least a 2 mile radius from the site, or 3 mile study radius may be necessary to correspond to the maximum concurrency study area.
- Roadway system description within study area, speed limit on the streets, current lane configurations at the intersections in the study area are presented.
- Clear site plan indicating site access location and number of units/square footage (8-1/2 x 11)
- Include County roadway improvements that could impact the analysis of the future traffic condition. Improvements need to be listed as "reasonably funded" and scheduled for completion of construction within six (6) years.

Trip Generation / Distribution/Assignment and Corridors

- Trip generation should reflect average rates and/or equations from the current ITE Trip Generation Manual.
- Trip generation based on independent trip generation calculations must consider the following: use data from the existing site if the proposed development is enlarging a building or moving locations, and/or similar facilities (competitors or other buildings in a chain store). If it is from an existing site, then the traffic study should use the existing trip rate calculation for the future trip projections. If it is from similar sites, we need data from a minimum of 3 similar sized and located facilities.
- Trip generation rate is for the peak hour of the adjacent street, unless the development will tend to have a "peaky" tendency for trip generation during the weekday or weekend. In this case, use the peak of the generator and compare with the street peak hour during the same day to see what hour is worse (this is usually done for weekends). The analysis should be for worst case scenario.
- Traffic study presents information and provides justification for making the following types of trip distinctions, as applicable.
    1. Internal vs. External Trips (for sites with multiple uses)
    2. Pass-by vs. Non-pass-by trips (based on ITE; verify to see if reasonable when compared with street traffic (i.e. pass-by trips of 100, but existing trips on road are only 100). Be skeptical if ITE rates are more than 5% of the future roadway traffic in front of the site. Be aware that pass-by trips can ONLY occur at the site driveways and can only come from vehicles normally traveling the roads where the site driveways touch. For example, trips coming from a nearby interstate to visit the site, then returning to the interstate are new diverted trips and not pass-by trip.
    3. New Diverted vs. New Primary Trips. This needs to be verified with ITE or data presented by the applicant. If there are new diverted trips, then a figure needs to show where trips are added and removed.
    4. Recheck that the sum of all trip distributions sum to the total trips projected for the site.
- Provide tables/diagrams that clearly show the different classification of trips, as applicable and the net trips added at intersections, including the site driveways.
- Staff will generally not accept operational or time of day changes or commitments to decrease trip generation.
- The applicant should provide trip generation, distribution, and assignment data to guide staff on how far the concurrency review extends from the site in accordance with CCC 40.350.020 (D)(5).
- Trip distribution diagrams extend in accordance with CCC40.350.020 (D)(5).
- If trip distribution is in dispute staff will defer to most recent RTC modeling distributions.
- Specialty Retail is not an accepted use.

- Off Peak Generating Uses: The County is interested in the worst case scenario for the analysis. If the applicant's traffic study can prove and document that the worst case traffic impacts are during the weekday PM peak hour, rather than the weekend peak hour, then the traffic study scope can be reduced to include only those intersections on the weekend which have a higher delay than during the weekday PM peak hour. The intersections, which are marked as site access onto the collector/arterial system, must be analyzed, regardless of weekday or weekend impact. The applicant is advised to inform County staff of these assumptions prior to submittal of the traffic study.
- Credits for existing facilities being replaced (September 23, 2009 Memorandum to the Development Engineering Advisory Board (DEAB)) The general rule is if a structure is standing and legally habitable (regardless of age), then trips carryover to a future site use and can be credited against future site trip generation. Note that the structure or site does not have to be presently occupied, in order to qualify. In the event that the structure is standing and habitable, but is currently an illegal or non-conforming use, the trip amount that can be carried over will reflect the most recent legal use of the structure and site. In the event that the structure is standing but is not habitable or in the event the structure has been demolished, the following process will be used. If the structure was permitted after 1990, then trips associated with the most recent legal and conforming use will be carried over. In the event that the structure has been demolished, the developer will need to provide credible evidence of that legal use. However, if the structure was last permitted before 1991, then the developer needs to provide credible evidence that the structure existed and was habitable within the last 5 years in order for trips to be carried over. Note that the five years is the period immediately preceding the pre-application conference.

Site Access

- Sight distance measurements at site access intersections (CCC 40.350.030) and not just estimates that they exceed the minimum standard.
- Turn lane warrants evaluations to check the need for right or left turn lanes. Existing storage capacity and future required length.
- LOS analysis for the existing accesses and future at build-out.

Concurrency LOS Analysis

- Existing traffic counts at study intersections done within 1 year of the traffic study's formal submittal date may be included in traffic impact study. Counts in the Concurrency Model older than the 1 year requirement and are within the applicants study radius, shall be counted.
- Background rates outside modeled areas should be assumed at 2% per year unless the applicant provides evidence to the contrary
- A future build-out year of three years is to be assumed for development, except commercial short plats and commercial subdivisions, which should assume a future build-out of six years.
- If there are any new links in the transportation system being created, indicate any changes in distribution of future traffic.
- Existing level-of-service at arterial / collector intersections in the study area, per the scoping letter, is reported in a table to include backup HCM analysis in the appendix using the most recent HCM that has adequate software analysis availability.
- LOS for existing + background + in-process numbers = future conditions without site
- LOS for existing + background + in-process numbers = future conditions with site at build-out

Warrants/Safety Analysis

- Accident analysis with rate calculations and methodology. If the accident rate is greater than 1.0 accidents per million entering vehicles, additional analysis may be required to determine possible mitigation to alleviate the safety issue.
- Accident data can be obtained from Mr. Huan Vuu at (360) 397-6118 ext. 4341.
- If an unsignalized intersection is failing, a traffic signal MUTCD warrant analysis is required.
- Turn lane warrants evaluations to check the need for right or left turn lanes on the major street at unsignalized intersections. Existing storage capacity and future required length.
- Queuing analyses should be conducted at subject intersections.
- Analysis should use the most recently adopted HCM unless otherwise directed by staff.

Improvement/Mitigation

- Ensure all LOS deficiencies are identified and solutions to correct any failing LOS are presented.
- Include an illustration for future lane configurations is provided if it is different from the existing situation.
- Mitigation must be volunteered to gain concurrency approval.
- Mitigation should be operational at first occupancy for commercial/retail development, or prior to the approval of the final plat for a residential short plat, or subdivision.
- Mitigation on Corridors: If the impact of a proposed development degrades the travel speed below the standard the applicant will be contacted. The applicant will then have an opportunity to identify mitigation at intersections and roadway links the proposed development impacts.

Other

- During the review process if the proposed use or size changes a new traffic study may be required or if significant addendum is anticipated. Additional review time shall also be authorized by the applicant to allow for Concurrency Model updates and analysis.
- If a road modification request is part of the application, the baseline traffic impact study shall be done assuming the road modification request will not be approved.
- Technical appendix - including sufficient material to convey complete understanding of traffic issues (e.g. HCM analyses, trip generation calculations, raw traffic count data, trip distribution data presented, trip distinction verification presented, in-process developments used and their trip assignment)

Concurrency Traffix™ Model

Fees

- In general, corridors are analyzed by the County, with conditions of approval to reimburse the County for expenses associated with the analysis. Typically, this reimbursement is a not to exceed fee of $2,000.

Global Parameters

- Background growth rates inside corridors have generally been found to be about 2% per year in the urban areas. Therefore, background growth rates shall be 2% per year for model analysis.
- Travel speeds are rounded to the nearest 1-mph when making a corridor operating level determination.

Intersection and Corridor Operational Data Collection

- Existing operating levels are based on travel speeds driven in the spring (April – May) or fall (September – October) by driving each corridor as many times as possible during one peak period on Tuesdays, Wednesdays, or Thursdays between 4-6 PM and possibly 6:30-8:30 AM.
- The travel speed methodology is that the driver moves with the general flow of traffic, e.g., if one car passes the driver, then the driver needs to pass one car. Note that this methodology may mean that the driver exceeds the speed limit in order to keep up with the flow of traffic. In those instances where there is no queue of cars to follow, the drivers are instructed to travel at the speed limit.
- Existing peak hour traffic counts at intersections are generally taken concurrent with the travel speed-driving program; however, developments seeking concurrency approval must also update any counts older than one year.
- For reference, the County is using GeoStats™ Software to model corridor travel speeds and Traffix™ Software to account for previously approved developments and background growth.

Updates

- Traffix ™ Model updates are generally scheduled to occur on a 12 – 18 month cycle.
- PM peak hour turning movement counts that have been performed, or received within a year of the last model update, are used to update intersection counts.

Clark County Concurrency Ordinance

Available at www.clark.wa.gov

Clark County Code 40.350.020

Appendix

Traffic Profile for Minor Development
(To be completed by Applicant)

Attach the following:
Vicinity Map(at least 2 mile radius)
Development Site Plan 8-1/2"x11"

Date:

Development Name:

Activity Number:

Estimated Date of Full Occupancy :

Site Summary: (include any existing structures to remain/to be replaced, type of proposed development, size (square footage) of building, number of units for proposed development, etc)