From: Jeffrey Delapena
To: "Heidi Pozzo"
Cc: Oliver Orjiako; Jose Alvarez
Subject: RE: Comp Plan Index of Record: 78th between Hazel Dell and Hwy 99/NW 9th Development
Date: Tuesday, September 8, 2026 11:43:00 AM

Good day, Heidi,

Thank you for submitting comments related to the 2025 Comprehensive Plan Update.

These comments will be added to the Index of Record.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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-----Original Message-----
From: Heidi Pozzo <hcpheidi@yahoo.com>
Sent: Tuesday, September 8, 2026 10:29 AM
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 Index of Record: 78th between Hazel Dell and Hwy 99/NW 9th Development

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Dear Jeff,

Please find attached an analysis of 78th between Hazel Dell and Hwy 99 to show the complete road segment with all the lights and impacts as opposed to how the segment was analyzed in the Concurrency Report for NW 9th. It should also be noted the traffic study is a bit odd in that it looks cobbled together and has dates/data from 2019. I've just uploaded exhibits on the link you provided me. If you could order the documents as the NE 78th Concurrency memo below, Google Earth picture of the intersection, Ex 47 Concurrency Report, Ex 45 Staff Report, Traffic Signals (below), traffic study. This segment appears in the Failing Corridors memo previously included in the index of record. Please include in the Comp Plan Index of Record.

Thank you,

Heidi

NE 78th Street — A Failing Segment, Approved

NW 9th Avenue Subdivision, PLD-2025-00021 · Every figure below is taken from the applicant's traffic study, the county's concurrency report, the Clark County Code, or Clark County Public Works.

The applicant's traffic study reports NE 78th Street between Hazel Dell Avenue and Highway 99 at a volume-to-capacity ratio of 0.95 — above the county's 0.90 concurrency standard. County staff cleared that failure by pointing to how the intersections at each end of the segment perform.

The county's segment standard is a capacity test. Its signalized intersection standard is a delay ceiling with no capacity test in it. Staff used the measure that cannot detect a capacity problem to excuse a failure of the measure that can — on a third of a mile beneath a freeway interchange that Clark County Public Works itself describes as prone to backups.

The segment failed the county capacity standard

Corridor segment	V/C eastbound	V/C westbound	Standard
NE 78th St — Hazel Dell Ave to Highway 99	**0.95**	0.83	0.90

Traffic Impact Study, Table 5, Corridor Analysis, PM Peak Hour, Year 2028 Traffic Conditions with Project.

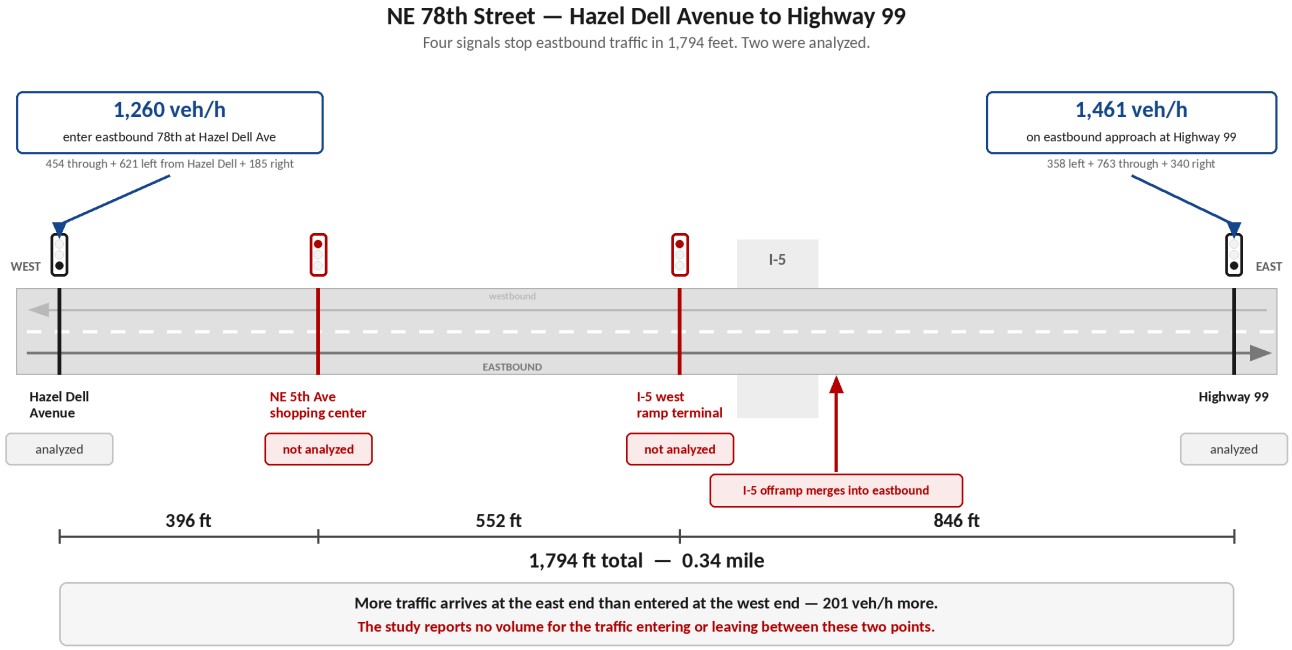
The traffic study does not say so. The paragraph immediately above this table states that the V/C ratios do not exceed 0.9, and the study recommends no improvements.

Clark County Public Works describes this exact segment as prone to backups

> *The signals on this portion of the 78th Street corridor are timed to reduce the potential for traffic to back up onto the northbound freeway off-ramp. The tight spacing of the freeway signal and the Northeast Highway 99 signal on Northeast 78th Street can cause backups. The signals are timed to try to find the best way to clear the eastbound approach for Northeast 78th Street at Northeast Highway 99, thereby reducing the potential for traffic to back up onto the freeway off-ramp.*
>
> *Clark County Public Works, Traffic Signals, clark.wa.gov/public-works/traffic-signals, describing NE 78th Street from NE Hazel Dell Avenue to NE Highway 99. The page adds that adaptive signals can be programmed to detect traffic backing up on the freeway off-ramp and "flush that traffic away from the ramps."*

The concurrency report states that no queueing issues were found on this segment.

It is not a plain stretch of road



Distances scaled from Google Maps at 500 ft reference. Volumes are adjusted flow rates from the traffic study's own HCS output, PM peak hour, year 2028 with project. Signals analyzed per Traffic Impact Study, Table 3 and Appendix D. Eastbound, west to east: Hazel Dell Avenue (analyzed), NE 5th Avenue at 396 ft (not analyzed), the I-5 west ramp terminal at 948 ft (not analyzed), Highway 99 at 1,794 ft (analyzed). The I-5 offramp merges traffic into the eastbound lanes between the last two.

The study's own sheets show 1,260 vehicles per hour entering eastbound at Hazel Dell Avenue and 1,461 on the eastbound approach at Highway 99 — more arriving at the east end than entered at the west, even though vehicles leave for I-5 in between. The study reports no volume for any traffic entering or leaving between those points.

What the code actually requires

Facility	Adopted standard	Source
County arterial or collector segment, unincorporated Vancouver UGA	Volume-to-capacity ratio not to exceed 0.90, measured independently for each direction	CCC 40.350.020(G)(1)(a)
Signalized intersection of regional significance	Individual movements not to exceed two cycle lengths or 240 seconds of delay, whichever is less	CCC 40.350.020(G)(1)(b)
Unsignalized intersection of regional significance	LOS E, or LOS D if signal warrants are met	CCC 40.350.020(G)(1)(c)

Clark County Code 40.350.020(G)(1). Subsection (E)(3) permits a concurrency approval only where operating levels do not fall below these standards.

The segment standard is a capacity measure and is stated without qualification: the ratio shall not exceed 0.90. It contains no intersection provision, no mobility test and no throughput allowance. The signalized intersection standard, by contrast, is a delay ceiling — at the 99.7-second cycle reported at Hazel Dell Avenue, roughly 199 seconds. It contains no capacity test at all, which is why a movement at a volume-to-capacity ratio of 1.140 can satisfy it.

The concurrency report cites CCC 40.350.020(F)(9) as the basis for evaluating the corridor outside the code's prescriptive measures. Subsection (F) is headed Determination of Operating Levels and lists the factors that go into calculating an operating level; (F)(9) is the catch-all for any other factors the Public Works Director determines could affect it. It is an input to the number, not an exception to the standard the number is measured against.

How staff cleared it

The clearance rests on lane configuration at the two intersections bounding the segment, a finding that no queueing issues were present, a comparison of background to buildout delay, and these two figures:

Figure cited in the concurrency approval	Intersection	Movement	Value
Eastbound approach delay	Hazel Dell Ave	Eastbound only	47 sec, LOS D
Eastbound approach delay	Highway 99	Eastbound only	33 sec, LOS C

Concurrency Staff Report, Exhibit 47, Corridor Finding. Decision: Approved with Conditions, signed August 14, 2026.

Each is the eastbound approach only. The report describes the segment as two eastbound and two westbound lanes built out to its ultimate width, with no reference to the shopping center signal, the ramp terminal, or the offramp merge inside it.

Both intersections it examined have movements it does not cite

NE 78th Street & Hazel Dell Avenue — PM peak hour, year 2028 with project. The report cites the eastbound line only:

NE 78th St & Hazel Dell Ave	Delay (sec)	LOS	V/C	Demand	Capacity
Eastbound approach	**46.9**	**D**	—	—	—
Westbound approach	35.8	D	—	—	—
Northbound approach	44.9	D	—	—	—
Southbound approach	**84.4**	**F**	—	—	—
Southbound left turn	**118.3**	**F**	**1.140**	621	545
Intersection average	**52.4**	**D**			

Traffic Impact Study, Appendix D, HCS 2010 Signalized Intersection Results Summary, Hazel Dell Ave. & 78th St., Year 2028 with Project, PM Peak Hour.

The southbound left turn carries 621 vehicles per hour against a capacity of 545. It is the movement bringing shopping center traffic onto eastbound 78th, and it is over capacity — which the intersection standard, being a delay ceiling, does not measure.

NE 78th Street & Highway 99 — same period. The report cites the eastbound line only:

NE 78th St & Highway 99	Delay (sec)	LOS	V/C	Demand	Capacity
Eastbound approach	**33.3**	**C**	—	—	—
Westbound approach	39.9	D	—	—	—
Northbound approach	33.0	C	—	—	—
Southbound approach	42.9	D	—	—	—
Southbound right turn	**55.2**	**E**	**0.91**	403	440
Intersection average	**36.9**	**D**			

Traffic Impact Study, Appendix D, HCS 2010 Signalized Intersection Results Summary, Highway 99 & 78th St., Year 2028 with Project, PM Peak Hour.

The cited 33.3-second eastbound approach is the best of the four. Both sets of delay figures come from HCS runs set to Uncoordinated, offset 0, with initial queue delay of 0.0 and queue storage ratio of 0.00 on all twelve movements — a model in which no queue carries between cycles or backs up from the signal downstream.

An intersection inside the study radius was left out

CCC 40.350.020(D)(5)(a) sets the study radius at one mile, measured straight-line, for a development generating fifty or fewer new peak period trips. This project generates twelve new AM and sixteen new PM peak hour trips.

Intersection on NW 78th Street	Straight-line from site	Within 1 mile?	In the study?
NW 9th Avenue	~0.45 mi	Yes	Yes
Hazel Dell Avenue	~0.74 mi	Yes	Yes
NW Lakeshore Avenue	**~0.87 mi**	**Yes**	**No**
Highway 99	~1.0 mi	At the limit	Yes

Distances scaled from Google Maps at 1,000 ft reference, measured from 8805 NW 9th Avenue. Study intersections per Traffic Impact Study, Table 3.

The study reached east to Highway 99, at approximately the one-mile limit. It did not reach west to NW Lakeshore Avenue, at roughly 0.87 mile on the same principal arterial. Clark County Public Works states of that intersection:

> *Traffic volumes and collision history at the intersection of Northwest Lakeshore Avenue and Northwest 78th Street warrant a change to improve safety and traffic flow. While we work with partners to identify, fund and design a more permanent solution, changing the signal timing will improve traffic flow and safety in the short term.*
>
> *Clark County Public Works, Traffic Signals, Upcoming work — NW Lakeshore at 78th St Traffic Signal Operational Change, clark.wa.gov/public-works/traffic-signals.*

Exhibit 47, Finding 5, states that the applicant analyzed crash history for October 2021 through October 2024, that the intersection crash rates for the study intersections do not exceed thresholds that would warrant additional analysis, that the study recommended no safety mitigations, and that staff concurs. NW Lakeshore Avenue is not a study intersection.

The project's own trips are not the test

This development adds twelve AM and sixteen PM peak hour trips. That figure is not what the standard measures. Under CCC 40.350.020(F), the operating level for a corridor is determined from existing traffic, the traffic impacts of other approved developments not yet fully built out, capacity reserved to other developments, and background growth. The 0.95 is the loaded condition of the segment, not this application's share of it — and a segment already above the standard is above it for every application tested against it, each tested in the order complete applications are filed under (E)(2).

The reports and the record do not agree

What the reports state	What the record shows
Traffic study: "the V/C ratios do not exceed 0.9."	Table 5 of the same study: 0.95 eastbound.
Concurrency report: no queueing issues were found at either intersection.	Clark County Public Works: signal spacing here "can cause backups," and signals are timed to keep traffic off the freeway off-ramp.
Eastbound approach at Hazel Dell Ave operates at LOS D, 47 seconds.	Southbound approach at the same intersection: LOS F, 84.4 seconds, movement over capacity at 1.140.
NE 78th Street is built out to its ultimate width through the segment.	Turn bays at the two approaches are credited as capacity for the segment.
The corridor complies because the bounding intersections perform acceptably.	CCC 40.350.020(G)(1)(a) sets the segment standard at 0.90 and says nothing about intersections.
Delay and LOS are identical background to buildout, so the project does not materially add to the V/C ratio.	No background corridor V/C is published anywhere in the record.
Crash rates for the study intersections do not warrant further analysis; no safety mitigation recommended.	Clark County Public Works: volumes and collision history at NW Lakeshore Ave & NW 78th St warrant a change. That intersection, 0.87 mile from the site, was not a study intersection.

Traffic Impact Study, Table 5 and Appendix D · Concurrency Staff Report, Exhibit 47 · Clark County Code 40.350.020 · Clark County Public Works, Traffic Signals.

The clearance rests on a premise the record does not support

An intersection-mobility finding works only if the intersections bounding the segment are moving the volume through. On this record one of them has an approach at LOS F with a movement over capacity, the other has a movement at LOS E, the delay figures for both came from a model in which queues cannot form, and the county's own Public Works department describes this segment as one where tight signal spacing causes backups onto the freeway ramp. A third of a mile with four signals, a freeway interchange and commercial access on both sides was analyzed as though nothing inside it existed — and a capacity failure was excused by a standard that does not measure capacity.

Sources: Transportation Impact Study for NW 9th Avenue Estates Subdivision, Kelly Engineering, January 23, 2025 — Table 3, Table 5, Appendix D · Concurrency Staff Report, Exhibit 47, issued August 7, 2026, signed August 14, 2026 · Clark County Code 40.350.020 · Clark County Public Works, Traffic Signals (clark.wa.gov/public-works/traffic-signals).

Recreational burn ban in effect for unincorporated Clark County LEARN MORE >

Traffic Signals



Getting better performance out of our traffic signals is a high priority, for the Clark County Council and Public Works.

Page contents (click to jump to a section)

- About traffic signals
- Upcoming work
- Report a signal concern

About traffic signals

× Technology

Technology

For decades, most traffic signals were governed by a programed cycle dictating how much time is allotted to red, g some signals, left-turn movements. Magnetic detectors embedded in the pavement also allowed vehicles to "trigge and provided some ability to hold green lights for vehicles.

With new technology, the county is able to enhance those capabilities by adding video and radar detection. Moderr this technology to detect oncoming vehicles and adjust signal timing more efficiently and safely for traffic flow.

The county's goal is to manage traffic signals as an integrated network, rather than a collection of individual interse

Clark County has been working to convert all of its coordinated traffic signal corridors to function within a central tr or adaptive operation. Most cities and counties time their coordinated signals based on a fixed time of day approacl timing plan used at the same time every day of the week.

In contrast, Clark County's traffic signals communicate with a central server application that monitors actual volume on the roads and selects the appropriate timing plan, based on the traffic conditions during the previous 10 to 15 mi

Clark County also has been working to install advanced systems to log performance data for traffic signals and arte This equipment tracks numerous metrics, such as overall travel time and percentage of traffic arriving at the interse green signal. Traffic engineers can make modifications to signal operations and monitor the effect on corridor spee factors.

Clark County began installing adaptive signal technology on several corridors in late 2017 to help improve the flow c corridors got adaptive signals:

- Northwest/Northeast 78th Street, from Northwest Ninth Avenue to Padden Parkway at Northeast 55th Avenue
- Northeast Highway 99, from Northeast 63rd Street to Northeast 96th Way.
- Northwest/Northeast 139th Street, from Northwest Second Avenue to Northeast 20th Avenue.

These corridors already have traffic responsive operation, but the responsive system lags behind changes in traffic about 15 minutes. Traffic responsive operation also cannot be configured to shift operation based on specific incide signals are able to change the signal operation on the corridors cycle by cycle and respond to incidents.

An example of how adaptive signal operation should better handle signal timing in the corridor is on Northeast 78th Northeast Hazel Dell Avenue to Northeast Highway 99. The signals on this portion of the 78th Street corridor are tir potential for traffic to back up onto the northbound freeway off-ramp. The tight spacing of the freeway signal and tl Highway 99 signal on Northeast 78th Street can cause backups.

The signals are timed to try to find the best way to clear the eastbound approach for Northeast 78th Street at North thereby reducing the potential for traffic to back up onto the freeway off-ramp. Adaptive signals can be programed backing up on the freeway off-ramp. The signal system will change to flush that traffic away from the ramps. Once clear, the signal system will revert to a smooth flow operation to better serve all traffic.

+ Battery backup systems

+ Flashing yellow arrows

+ Radar detection systems

+ LED luminaires

+ LED vehicle/pedestrian signal indicators

+ Accessible pedestrian push buttons

+ Countdown pedestrian indications

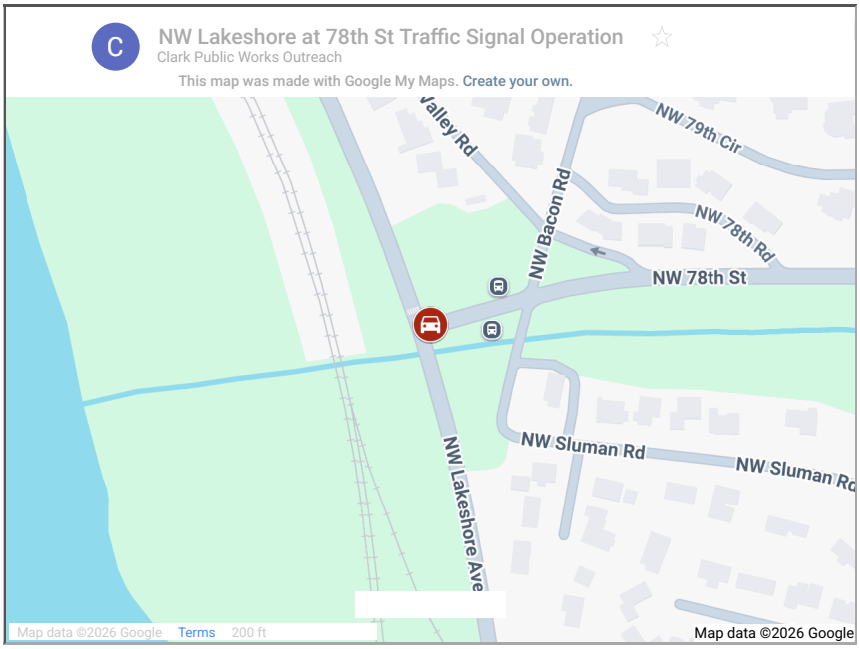
Upcoming work

The county is developing standards for automated performance measures. Each corridor is being evaluated to detern performance measure for each group of intersections in the corridor. These performance measures will help traffic er when corridors should be re-timed, along with when a corridor is operating in a manner that needs immediate attentic

✕ NW Lakeshore at 78th St Traffic Signal Operational Change

NW Lakeshore at 78th St Traffic Signal Operational Change

To improve safety and traffic flow, Clark County Public Works is adjusting the signal timing at the intersection of No Lakeshore Avenue and Northwest 78th Street, starting in August 2025.



Traffic volumes and collision history at the intersection of Northwest Lakeshore Avenue and Northwest 78th Street to improve safety and traffic flow. While we work with partners to identify, fund and design a more permanent soluti signal timing will improve traffic flow and safety in the short term.

In mid-November, the signal timing will be updated to allow left turns from the southbound lanes while the northbou have a red light. This means that left turns from the southbound lanes will now be able to proceed freely without yie northbound traffic.

When the change is implemented, travelers may notice new striping, updated intersection signage, revised signal c a change in signal timing. The queue of vehicles in the southbound lane will decrease, and the queue in the northbc increase slightly.

For more information, click here to view the frequently asked questions.

+ Traffic Signals Upgrades

Report signal concern

If you see a malfunctioning traffic signal, please call 564.397.2446 or submit an online road maintenance request.

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