



**Washington State  
Department of Transportation**

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January 14, 2015

Jose Alvarez, Planner III  
Matt Herman, Planner III  
Clark County Community Planning  
1300 Franklin Street PO Box 9810  
Vancouver, WA 98666

Re: CPZ2014-00010 NE 139<sup>th</sup> St. North  
Comprehensive Plan Amendment and Zone Change  
SR 5, MP 7.50

Dear Mr. Alvarez and Mr. Herman:

The Washington State Department of Transportation (WSDOT) has reviewed the material submitted for this application. It is our understanding that the applicant requested a Comprehensive Plan amendment and zoning designation change from a Light Industrial designation with IL zoning and Urban Medium designation to General Commercial with GC zoning. This proposal was first submitted to the County in 2008. We understand that at that time, the applicant proposed a concomitant rezone agreement that would limit the number of trips to the original zoning (462 PM peak trips). As this agreement was never executed, the zoning has not changed. We understand that this application is requesting that the cap of 462 peak hour trips be lifted, and that the subject parcels be rezoned to General Commercial. Because no development plans have been submitted, WSDOT has no specific comments at this time. However, WSDOT would like to make the following general comments at this time:

Clark County provided WSDOT with the Transportation Impact Analysis (TIA) submitted by the applicant. WSDOT SW Region Traffic Office performed a preliminary review of the TIA, and noted the following:

- WSDOT's main concern is that no freeway off ramp traffic impacts the mainline of I-5 and I-205. According to Table 6 on Page 16, the NE 134<sup>th</sup> Street / I-205 NB off ramp – NE 23<sup>rd</sup> Avenue fails in 2035.
- Page 2 states that HCM 2000 methodology was used in this TIA, except for roundabouts. Why wasn't HCM 2010 methodology used throughout?
- This TIA did not analyze weekend traffic volumes. Given that the proposed zoning is General Commercial, weekend traffic volumes could generate significantly higher volumes.

- WSDOT uses linear growth rate projections. Why is the growth rate in this analysis compounded annually (per the Background Growth paragraph on Page 6)?
- On Page 9, the trip distribution of 0% to/from NE 134<sup>th</sup> Street east of NE 23<sup>rd</sup> Avenue is questionable.
- According to the top paragraph on Page 12, shorter retail trips result in less impact to the network. Please explain.
- There is not much change in distribution percentages from current zoning to proposed traffic coming from the south. This does not seem reasonable.
- Also on Page 4, the following trip distributions seem low:
  - 15% to/from Interstate 205 south via NE 134<sup>th</sup> Street
  - 5% to/from NE 134<sup>th</sup> Street east of NE 23<sup>rd</sup> Avenue
  - 7% to/from NE 139<sup>th</sup> Street east of NE 20<sup>th</sup> Avenue
  - 8% to/from NE 20<sup>th</sup> Avenue north of NE 139<sup>th</sup> Street
  - 10% to/from Interstate 5 north of NE 139<sup>th</sup> Street

These comments are based on a review of this application for a Comprehensive Plan Amendment and zone change to General Commercial and lifting of the cap of 462 PM peak hour trips. When a proposed development is brought forward for review, there may be need for additional information by this department for further review. There may be other issues and requirements by this department that are not stated here. Other issues or requirements may include, but are not limited to drainage, illumination, access, signing, and channelization. This review does not constitute final approval of any development of this property by WSDOT.

Thank you for the opportunity to comment on this application. If you have need of additional information, please contact Mr. Ken Burgstahler, Southwest Region Planning Office, at (360) 905-2052.

Sincerely,



H. Michael Clark  
Southwest Region Planning Manager

HMC: kb