

**RATE STUDY**  
FOR  
**IMPACT FEES**  
FOR  
**ROADS**

CITY OF PUYAILUP, WASHINGTON

September 19, 2005

## EXECUTIVE SUMMARY

The purpose of this study is to establish the rates for impact fees for roads in the City of Puyallup, Washington.

### Rates

The impact fee for roads is based on \$3,009.24 per p.m. peak hour trip. Rates for road impact fees for new development are listed in Table 7. The following is a summary of the rates for residential properties.

Type Dwelling Unit	Impact Fee
Single Family Apartment Condominium All Other Land Uses	\$ 3,039.33 per dwelling unit 1,865.73 per dwelling unit 1,564.80 per dwelling unit See Table 7

### Impact Fees vs. Other Developer Contributions

Impact fees are charges paid by new development to reimburse local governments for the capital cost of public facilities that are needed to serve new development and the people who occupy or use the new development. Throughout this study, the term "developer" is used as a shorthand expression to describe anyone who is obligated to pay impact fees, including builders, owners or developers.

The impact fees that are described in this study do not include any other forms of developer contributions or exactions, such as mitigation or voluntary payments authorized by SEPA (the State Environmental Policy Act, RCW 43.21C), system development charges for water and sewer authorized for utilities (RCW 35.92 for municipalities, 56.16 for sewer districts, and 57.08 for water districts), local improvement districts or other special assessment districts, linkage fees, or land donations or fees in lieu of land.

### Adjustments for Other Sources of Revenue for Road Capital Improvements

The impact fees in this study recognize the existence of other sources of revenue that are available to pay for the capital cost of roads. These other revenues are accounted for by reducing the amount of the impact fee rates to adjust for the portion of road capital project costs that are paid by the other revenues.

development), and "designed to provide service for a development project, and that are necessary for the use and convenience of the occupants or users of the project" as provided in RCW 82.02.050(6).

### **Expenditure Requirements for Impact Fees**

Impact fees must be spent on capital projects contained in an adopted capital facilities plan (CFP), or they can be used to reimburse the government for the unused capacity of existing facilities. Impact fee payments that are not expended or obligated within 6 years must be refunded unless the City Council makes a written finding that an extraordinary and compelling reason exists to hold the fees for longer than 6 years. In order to verify these two requirements, impact fee revenues must be deposited into separate accounts of the government, and annual reports must describe revenue and expenditures.

### **Developer Options**

A developer who is liable for impact fees has several options regarding impact fees. First, the developer can pay the impact fee using the rate schedule in Table 7. The developer can submit data and/or analysis to demonstrate that the impacts of the proposed development are less than the impacts calculated in this rate study. The developer can appeal the impact fee calculation by the City of Puyallup. The developer can obtain a refund if the development does not proceed and no impacts are created, if the local government fails to expend the impact fee payments within 6 years of receipt of such payments, the developer (or subsequent owner of the property) can obtain a refund of the impact fees.

### **ORGANIZATION OF THE STUDY**

This impact fee rate study contains four chapters, and an appendix:

- Chapter 1 summarizes the statutory basis for developing impact fees, discusses issues which must be addressed, and presents the methodology and formulas for calculating the impact fee;
- Chapter 2 lists the capital improvement project costs of system improvements to roads, and subtracts existing deficiencies and non-impact fee revenues to determine the unfunded net cost of eligible road projects.
- Chapter 3 documents the growth in trips attributable to new development, and calculates the cost per growth trip,
- Chapter 4 documents the trip generation rate for each type of land use, and calculates the road impact fee for each of the land use types.
- Appendix A documents the need for additional road capacity.

a fire district). RCW 82.02.050(2) and (4), and RCW 82.02.090(7)

### **Types of Improvements**

Impact fees can be spent on "system improvements" (which are typically outside the development), as opposed to "project improvements" (which are typically provided by the developer on-site within the development). RCW 82.02.050(3)(a) and RCW 82.02.090(6) and (9)

### **Benefit to Development**

Impact fees must be limited to system improvements that are reasonably related to, and which will benefit new development, RCW 82.02.050(3)(a) and (c). Local governments must establish reasonable service areas (one area, or more than one, as determined to be reasonable by the local government), and local governments must develop impact fee rate categories for various land uses. RCW 82.02.060(6)

### **Proportionate Share**

Impact fees cannot exceed the development's proportionate share of system improvements that are reasonably related to the new development. The impact fee amount shall be based on a formula (or other method of calculating the fee) that determines the proportionate share. RCW 82.02.050(3)(b) and RCW 82.02.060(1)

### **Reductions of Impact Fee Amounts**

Impact fees rates must be adjusted to account for other revenues that the development pays (if such payments are earmarked for or proratable to particular system improvements). RCW 82.02.050(1)(c) and (2) and RCW 82.02.060(1)(b) Impact fees may be credited for the value of dedicated land, improvements or construction provided by the developer (if such facilities are in the adopted CFP as system improvements eligible for impact fees and are required as a condition of development approval). RCW 82.02.060(3)

### **Exemptions from Impact Fees**

Local governments have the discretion to provide exemptions from impact fees for low-income housing and other "broad public purpose" development, but all such exempt fees must be paid from public funds (other than impact fee accounts). RCW 82.02.060(2)

### **Developer Options**

Developers who are liable for impact fees can submit data and/or analysis to demonstrate that the impacts of the proposed development are less than the impacts calculated in this rate study. RCW 82.02.060(5). Developers can pay

A city may only charge and use impact fees on State roads if it has an agreement with the State, and the City CFP includes the state road projects.

### Capital Facilities Plan

There are many references in RCW to the "capital facilities plan" (CFP) as the basis for projects that are eligible for funding by impact fees. Cities often adopt documents with different titles that fulfill the requirements of RCW 82.02.050 et. seq pertaining to a "capital facilities plan". The Transportation Element of the City of Puyallup Comprehensive Plan fulfills the requirements in RCW, and is considered to be the "capital facilities plan" (CFP) for the purpose of this impact fee rate study. All references to a CFP in this study are interpreted as referring to the City's CFP or the Transportation Element of the City of Puyallup Comprehensive Plan.

### Need for Additional Road Capacity

The need for additional road capacity is determined by using standards for levels of service for roads and other metrics, such as increase in traffic volume. The analysis of needed roads must comply with the statutory requirements of identifying existing deficiency, reserve capacity and new capacity requirements for facilities. An analysis of the need for additional roads in Puyallup is presented in Appendix A,

### Determining the Benefit to Development

The law imposes three tests of the benefit provided to development by impact fees: 1) proportionate share, 2) reasonably related to need, and 3) reasonably related to expenditure (RCW 80.20.050(3)).

#### 1. Proportionate Share.

First, the "proportionate share" requirement means that impact fees can be charged only for the portion of the cost of public facilities that is "reasonably related" to new development. In other words, impact fees cannot be charged to pay for the cost of reducing or eliminating deficiencies in existing facilities.

Second, there are several important implications of the proportionate share requirement that are not specifically addressed in the law, but which follow directly from the law:

- Costs of facilities that will benefit new development and existing users must be apportioned between the two groups in determining the amount of the fee. This can be accomplished in either of two ways: (1) by allocating the total cost between new and existing users, or (2) calculating the cost per trip and applying the cost only to new development when calculating impact fees.

- FeePAYERS can pay a smaller fee if they demonstrate that their development will have less impact than is presumed in the impact fee schedule calculation for their property classification. Such reduced needs must be permanent and enforceable (i.e., via land use restrictions),

Puyallup's roads serve the entire City, therefore the impact fees for these road capital improvements are based on a single service area which encompasses the City.

### **3. Reasonably Related to Expenditures.**

Two provisions of the law tend to reinforce the requirement that expenditures be "reasonably related" to the development that paid the impact fee. First, the requirement that fee revenue must be earmarked for specific uses related to public facilities ensures that expenditures are on identifiable projects, the benefit of which can be demonstrated. Second, impact fee revenue must be expended or obligated within 6 years, thus requiring timeliness to the benefit to the fee payer.

### **Methodology and Relationship to Capital Facilities Plan**

Impact fees for roads begin with the list of projects in the Transportation Element of City's Comprehensive Plan (the "CFP", as noted earlier). The projects in the Transportation Element are analyzed to identify capacity costs attributable to new development. The costs are apportioned between existing deficiencies (if any) and growth capacity. The costs are adjusted to reflect other sources of revenue paid by the new development (and any payments that reduce the cost of the facility that is to be paid by impact fees). The costs are calculated per growth trip. The costs per growth trip are applied to the unique trip generation rates for each type of land use. The amount of the fee is determined by charging each fee-paying development for cost of the number of growth trips that it generates.

### **Calculation of Impact Fee Amounts**

Five formulas are used to determine the amount of impact fees for roads that are required as a result of new development:

#### **1. Growth Share of Project Costs**

$$\text{Cost of projects} \quad \text{Deficiency portion (if any)} \quad = \quad \text{Growth share of project costs}$$

**Process for Challenging Impact Fees**

State statutes require that the impact fee ordinance provide for an appeals procedure. The procedure can be the same as for other land development challenges (i.e., the hearing examiner), or it can be a different procedure,

**Data Sources**

The data in this study of impact fees for roads in Puyallup, Washington was provided by the City of Puyallup, unless a different source is specifically cited.

**Data Rounding**

The data in this study was prepared using computer spreadsheet software. In some tables in this study, there may be very small variations from the results that would be obtained using a calculator to compute the same data. The reason for these insignificant differences is that the spreadsheet software was allowed to calculate results to more places after the decimal than is reported in the tables of these reports. The calculation to extra places after the decimal increases the accuracy of the end results, but causes occasional differences due to rounding of data that appears in this study.

**Variable (B): Deficiency Costs**

Existing deficiencies are determined by comparing existing traffic volume to existing capacity of each road that is planned for improvement. If current traffic exceeds current capacity, the "excess" trips is the number of deficient trips.

The number of deficient trips is divided by the number of additional trips that can be accommodated by the improved road or intersection. The resulting percentage is the percent of the improvement project that is attributable to the existing deficiency. Multiplying the deficiency percentage times the project cost determines the cost that is attributable to the deficiency.

**CALCULATION OF ROAD PROJECT GROWTH COSTS**

The calculation of growth costs of road projects that are eligible for impact fees are presented in Tables 1 - 3.

Table 1 lists roads that need to be widened. The projects are numbered R-1 through R-16. Projects R-9, and R-11 through R-13 were determined not to be eligible for impact fees at this time due to their predicted service standard in the year 2014.

Table 2 lists new roads ("links") that need to be built. The projects are numbered L-1 through L-6.

Table 3 lists intersections that need to be signaled (or existing signals need to be upgraded). The projects are numbered I-1 through I-19. Project I-15 was determined not to be eligible for impact fees at this time because it is currently outside the City's current boundaries, but within the City's Urban Growth Area.

In each table, columns 1 and 2 list the eligible projects and total costs from the CFP. The deficiency percent is listed in Column 3, and the deficiency cost appears in Column 4. The deficiency costs are subtracted from the total costs, and the balance ("growth cost") is shown in Column 5.

Table 2: Growth Cost of New Link Projects Eligible for Impact Fees

Proj #	(1) Description of Eligible Projects	(2) Total Cost	(3) Deficiency Percent	(4) Deficiency Cost	(5) Growth Cost
L-1	Shaw Road Ex E Pioneer to E Main	16,300,000	none	\$ 0	16,300,000
L-2	5 <sup>th</sup> / 9 <sup>th</sup> St SW Connector 9 <sup>th</sup> Ave to 15 <sup>th</sup> Ave SW	5,076,000	none	0	5,076,000
L-3	5 <sup>th</sup> Street SE 37 <sup>th</sup> Ave to 43 <sup>rd</sup> Ave SE	1,600,000	none	0	1,600,000
L-4	39 <sup>th</sup> Ave SE Extension Meridian to 9 <sup>th</sup> St SE	9,500,000	none	0	9,500,000
L-5	47 <sup>th</sup> Ave SE Meridian to 10 <sup>th</sup> St SE	1,900,000	none	0	1,900,000
L-6	5 <sup>th</sup> Street SE 43 <sup>rd</sup> Ave to 47 <sup>th</sup> Ave SE	2,850,000	none	0	2,850,000
<b>GRAND TOTAL</b>		<b>37,226,000</b>		<b>0</b>	<b>37,226,000</b>

Table 3: Growth Cost of Intersection Projects Eligible for Impact Fees

Proj #	(1) Description of Eligible Projects	(2) Total Cost	(3) Deficiency Percent	(4) Deficiency Cost	(5) Growth Cost
I-1	River Road & 11 <sup>th</sup> Street NW New signal	\$ 858,000	none	\$ 0	\$ 858,000
I-2	River Road Signal interconnect	350,000	none	0	350,000
I-3	River Road & 7 <sup>th</sup> Street NW Add NB & SB prot/perm left turn	25,000	none	0	25,000
I-4	9 <sup>th</sup> /94 <sup>th</sup> Ave @ 39 <sup>th</sup> Ave SW New signal and additional lanes	2,300,000	none	0	2,300,000

**FORMULA 2: GROWTH COSTS ELIGIBLE FOR IMPACT FEES**

The unfunded growth costs of eligible road projects are calculated by adjusting the growth costs to reflect other funding shown in the City's Transportation Element,

$$\text{Growth share of project costs} - \text{Revenue from other sources} = \text{Growth share of project costs eligible for impact fees}$$

There is one new variable that requires explanation: (C) adjustments

**Variable (C): Adjustments**

Impact fee rate calculations must recognize and reflect all known sources of revenue from new development which are earmarked or proratable to a particular impact fee project. These sources of revenue can include locally generated revenues (e.g., taxes, fees or charges, interest, etc.), state and/or federal grants, bonds, or other revenue sources, which are committed to road capital improvement projects. The City of Puyallup's impact fee calculations include adjustments for all non-impact fee revenue, whether paid by new development, or paid by existing residents and businesses.

Revenues that are used for repair, maintenance or operating costs are not included because impact fees are not used for such expenses. Revenues for payments of *past* taxes paid on vacant land prior to development are not included because new capital projects do not have prior costs, therefore prior taxes did not contribute to such projects.

If a developer believes that significant prior payments were made that meet the criteria of RCW 82.02.060(1)(b), the City's ordinance provides that an applicant can submit supporting information and request a special review.

**CALCULATION OF ADJUSTED COST OF GROWTH**

The calculation of the adjusted (unfunded) costs of road projects that are eligible for impact fees is presented in Table 4.

Table 4, Section A, lists the revenues the City has in the CFP totaling \$62.9 million.

Table 4, Section B, lists the cost of projects not eligible for impact fees, including projects that are not eligible for mitigation (\$18.8 million) and the deficiency portion (\$4.3 million) of the cost of projects that are otherwise eligible, for a total of \$23.1 million of project costs that are not eligible for impact fees.

(1) Description	(2) Amount
D. Adjusted Cost of Growth	
Eligible Cost of Impact Fee Projects (Tables 1-3)	\$ 76,268.623
Other Revenue Available for Impact Fee Projects	<u>- 39,829,778</u>
Adjusted Cost of Growth	36,438,845

**FORMULA 4: COST PER GROWTH TRIP**

The adjusted cost of road projects per growth trip is calculated by dividing the adjusted cost of road projects by the number of growth trips:

$$\frac{\text{Growth share of project costs eligible for impact fees}}{\text{Growth trips}} = \text{Cost per growth trip}$$

**CALCULATION OF COST PER GROWTH TRIP**

Table 6 shows the calculation of the cost per growth trip by dividing the cost of road projects that are eligible for impact fees (from Table 4) by the number of growth trips (from Table 5).

Table 6: Cost per Growth Trip

Adjusted Cost of Projects for Growth	\$ 36,438,845
Growth Trips	- 12,109
Cost per Growth Trip	\$ 3,009.24

trip was going to occur regardless of the incidental stop, therefore the trip rate of the store should not be charged as an additional impact on the road system. The adjustment is based on the number of "pass-by" trips that stop at the store instead of "passing by." In the rate table these trips are eliminated by counting only the trips that are truly "new" trips (i.e., a person made a special trip to the store). The adjustment is shown in Table 7 as "Percent New Trips."

**CALCULATION OF IMPACT FEE RATES FOR SPECIFIC-LAND USES (Examples)**

Table 7 shows examples of the calculation of impact fee rates for frequently used categories of land use that are listed in column 1. The ITE trip rate in column 2 is multiplied times the percent new trips in column 3. Column 4 reports the net new trips that are the result of these calculations. The impact fee rates in column 5 are calculated by multiplying the net new trips from column 4 times the cost per growth trip (from Table 6, and repeated in the column heading of column 5),

Applicants for building permits who propose development consistent with the examples in Table 7, impact fees can be assessed as follows:

1. Select the appropriate land use category from Table 7, and find the impact fee rate per unit in column 5. If the proposed development is not covered by any of the categories in Table 7, the City can select the category that is most similar to the proposed development, or the applicant can submit a trip generation study of its proposed development.
2. Determine the number of "units" of development the applicant proposes to build ("Units" are listed in the right portion of column 5)
3. Multiply the rate per unit by the number of units to be built. The result is the impact fee,

**EXAMPLE CALCULATIONS OF IMPACT FEE RATES FOR HYPOTHETICAL LAND USES**

A 6 Lot Subdivision. ITE code 210: \$3,039.33 per dwelling unit times 6 lots = \$18,235.98.

A mixed use development of 6,000 square feet of retail on the ground floor and 5 condominiums on upper floors. ITE code 820, shopping center: \$7.45 per square foot times 6,000 square feet = \$44,700, plus ITE code 230, condo: \$1,564.80 times 5 units = \$7,824. Total fee is \$44,700 + \$7,824 = \$52,524.

(1) ITE Code	(2) ITE Land Use Category	(3) Trip Rate	(4) New Trips	(5) Net New Trips per Unit of Measure	(6) Impact Fee Per Unit @ \$ 3,009.24 per Trip
720	Medical office	3.72	100%	3.72 1,000 sq ft	\$ 11.19 pcrsquarefoot
760	R&D center	1.08	100%	1.08 1,000 sq ft	3.25 per square foot
812	Building materials & lumber	4.49	100%	4.49 1,000 sq ft	13.51 per square foot
814	Specialty retail	2.71	100%	2.71 1,000 sq ft	8.16 per square foot
820	Shopping Center	3.75	66%	2.48 1,000 sq ft	7.35 per square foot
850	Supermarket	10.45	64%	6.69 1,000 sq ft	20.13 per square foot
851	Convenience market-24 hr	52.41	39%	20.44 1,000 sq ft	615.1 per square foot
890	Furniture store	0.46	47%	0.22 1,000 sq ft	0.65 per square foot
896	Video rental	73.60	100%	13.60 1,000 sq ft	40.93 per square foot
911	Bank: walk-in	33.15	100%	33.15 1,000 sq ft	99.76 per square foot
912	Bank: drive-in	45.74	53%	24.24 1,000 sq ft	72.95 per square foot
931	Quality restaurant	7.49	56%	4.19 1,000 sq ft	12.62 per square foot
932	Restaurant: sit-down	10.92	57%	6.22 1,000 sq ft	18.73 per square foot
933	Fast food, no drive-up	26.15	50%	13.08 1,000 sq ft	39.35 per square foot
934	Fast food, w/ drive-up	34.64	50%	17.32 1,000 sq ft	57.12 per square foot
936	Drinking place	11.34	100%	11.34 1,000 sq ft	34.12 per square foot
943	Auto parts & service center	4.46	57%	2.54 1,000 sq ft	7.65 per square foot
944	Service station	13.86	34%	4.71 vfp	14,180.73 per vfp <sup>4</sup>
947	Self-service car wash	5.54	100%	5.54 wash stall	16,671.17 wash stall
949	Automated car wash	14.12	100%	14.12 1,000 sq ft	42.49 per square foot

<sup>4</sup> vfp: vehicle fueling position

baseline to identify any existing deficiencies (that cannot be corrected by new impact fees). The future ratios identify which roads will become congested as a result of future growth, and are therefore eligible to be funded by impact fees,

The model analyzes roads in "segments" that represent specific sections of a road that have different characteristics from other segments of the same road. Characteristics that change include the number of lanes, or the characteristics of a cross street.

The results of the modeling were examined carefully. There are four possible combinations of current and future v/c ratios for trips on existing roads, as shown in the four outcomes listed in Table 8. Any road segments that have outcomes #1 or 3 were excluded from consideration for impact fees. Any road segments with outcome #2 were included in the list of roads eligible for impact fees. Any road segments with outcome #4 were further analyzed to determine the portion of their costs that are attributable to existing deficiencies (not eligible for impact fees) and the portion of their costs are attributable to future growth, and therefore eligible for impact fees

Table 8: Road Congestion Analysis Outcomes

Current and Future Traffic	Eligibility for Impact Fees
1. Current v/c is acceptable, and future v/c will be acceptable.	No improvement is needed. therefore no costs are eligible for impact fees.
2. Current v/c is acceptable, but future v/c will be congested,	Improvement is needed only because of growth, therefore the entire improvement is eligible for impact fees.
3. Current v/c is congested, but future v/c will be acceptable.	Improvement is needed for current deficiency, or future traffic uses other roads, therefore no costs are eligible for impact fees.
4. Current v/c is congested, and future v/c will be more congested.	Improvement is needed for both current deficiency and future growth, therefore only the growth portion of the project is eligible for impact fees

[Note: It is possible for a road improvement project to create enough capacity to eliminate an existing deficiency and also provide capacity to serve growth. The portion of a project's cost that is attributable to existing deficiency is calculated by dividing the amount of deficient traffic volume by the design capacity of the road improvement project.]

Table 9: Needs Analysis Road Widening Projects

Proj #	(1) Description of Eligible Projects	(2) Existing Capacity	(3) 2014 Volume	(4) V/C with No Improvement
R-1	9 <sup>th</sup> /94 <sup>th</sup> Ave 39 <sup>th</sup> Ave SW to city limits	1,000	1,821	1.82
R-2	31 <sup>st</sup> Ave SW Meridian to 9 <sup>th</sup> St SW	1,000	1,416	1.42
R-3	43 <sup>rd</sup> Ave SE (with signal @ 5 <sup>th</sup> ) Meridian to 5 <sup>th</sup> St SW	850	691	0.81*
R-4	39 <sup>th</sup> Ave SW 14 <sup>th</sup> St to 17 <sup>th</sup> St SW	1,000	1,265	1.27
R-5	Shaw Road 23 <sup>rd</sup> Ave to 39 <sup>th</sup> Ave SW	1,000	942	0.94
R-6	39 <sup>th</sup> Ave SW Meridian to 9 <sup>th</sup> St SW	1,000	983	0.98
R-7	39 <sup>th</sup> Ave SW 9 <sup>th</sup> St to 14 <sup>th</sup> St SW	1,400	1,351	0.97
R-8	Shaw Road 23 <sup>rd</sup> Ave to Pioneer	1,000	959	0.96
R-70	Stewart 4 <sup>th</sup> St to 12 <sup>th</sup> St NW	1,000	953	0.95
R-14	Stewart - Phase 1 at Ashley Meadows	1,000	2,000	2.00
R-15	Stewart - Phase 2 Ashley Meadow to 66 <sup>th</sup> Ave E	1,000	2,000	2.00
R-16	23 <sup>rd</sup> Ave SE 17 <sup>th</sup> to Shaw missing section	850	735	0.86

\* The intersection LOS will be F in 2014 without these improvements.

Proj #	(1) Description of Eligible Projects	(2) Existing LOS	(3) 2014 LOS With Project	(4) 2014 LOS Without Project
I-6	39 <sup>th</sup> Ave SW & Wildwood Dr SE New signal & left turn lanes	F	A	F
I-7	9 <sup>th</sup> St SW & SR 512 on ramp NB dual left turn lane widen ramp	C	E	F
I-3	43 <sup>rd</sup> Ave SE & 10 <sup>th</sup> St SE New signal & additional lanes	D Approach LOS	B	F
I-9	43 <sup>rd</sup> Ave SE & Meridian New signal & left turn lanes	D	E	F
I-10	39 <sup>th</sup> Ave & 5 <sup>th</sup> St SE New signal	E Approach LOS	C	F
I-11	23 <sup>rd</sup> Ave SE & 7 <sup>th</sup> St SE New signal & lanes - north leg	F Approach LOS	B	F
I-12	9 <sup>th</sup> Ave SW & 5 <sup>th</sup> St SW New signal	C Approach LOS	A	F
I-13	7 <sup>th</sup> Ave SW & 5 <sup>th</sup> St SW New signal & left turn lanes	D	B	F
I-14	Stewart & 5 <sup>th</sup> St NW Signal upgrade	D	D	F
I-16	31 <sup>st</sup> Ave & 5 <sup>th</sup> St SW New signal	E Approach LOS	B	F
I-17	Pioneer & 5 <sup>th</sup> St SW Signal upgrade	D	C	B *
I-18	West Stewart & 7 <sup>th</sup> St NW New signal	E Approach LOS	B	F
I-19	Main & 5 <sup>th</sup> Ave NE New signal	F Approach LOS	B	F

\* Without the 5<sup>th</sup>/9<sup>th</sup> connector, the traffic volumes reduce over time at this intersection, as other routes are used in place of this circuitous route.