



1130 SW Morrison St., Suite 318
Portland, OR 97205
503.248.0313
lantermobley.com

Memorandum

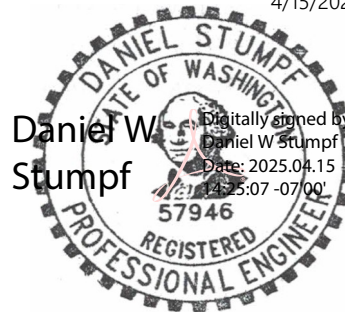
4/15/2025

To: James E Carothers, City of Camas
Anita Ashton, City of Camas

From: Daniel Stumpf, PE

Date: April 15, 2025

Subject: USTA/CSD PNW Tennis Center
Public Comments Response Memorandum 3



Introduction

This Memorandum responds to public comments received from Mr. Clark and Ms. Caryn Vitek of Evergreen Tennis LLC, dated April 9, 202[5].¹ (Ex. 71 CUP24-1001), regarding the proposed USTA/CSD PNW Tennis Center application. The tennis center is a joint project between the Camas School District and the United States Tennis Association. The proposal is to eliminate two existing pickleball courts and improve and add an all-weather cover to the remaining eight tennis courts. The USTA is a non-profit organization that is dedicated to growing the sport of tennis. The District provides athletic opportunities to students at the Camas High School, including approximately 200 students who turn out for the school's men and women tennis teams. Under the parties' agreement, the Camas School District would continue to own the tennis facility and students would have priority use of the courts. The USTA is making a significant financial contribution to upgrade and cover the courts and would be responsible for maintenance and day-to-day operations, including scheduling use by members of the public.

The following sections include responses to transportation concerns raised by interested parties with responses following. To keep this response Memorandum concise and to avoid issuing redundant responses, in some cases lengthy comments were abbreviated and responses to similar comments refer to prior sections of this memorandum as well as the following documents:

- *USTA/CSD PNW Tennis Center Public Comments Response Memorandum*, dated March 4, 2025 (referred to as "**Memo 1**").
- *USTA/CSD PNW Tennis Center Public Comments Response Memorandum 2*, dated April 2, 2025 (referred to as "**Memo 2**").
- *USTA/CSD PNW Tennis Center Transportation Impact Study (TIS)*, dated April 2, 2025 (referred to as "**TIS**").

¹ The Vitek comment letter is erroneously dated April 9, 2024.

Comments and Responses

Comment 1

The applicant's continued claim of "Zero net new PM Peak Hour trips" is not supported by the evidence presented in the application, and can not be derived from any common sense understanding of the facts. The applicant has the burden to show this statement is reasonably correct, and has not done so.

It is a false statement to claim that no supporting evidence or discussion of reasonable facts has been submitted as part of this development application to determine that no new PM peak hour trip generation will occur. Evaluation of PM peak hour trip generation had been demonstrated and discussed at length based on both data from the *ITE Trip Generation Manual, 11th Edition* and operations of the proposed USTA/CSD facility in the following documents:

- **Memo 1:** *Supplemental Analysis* section, *Comment 1*, *Comment 2*, *Comment 5*, *Comment 6*, and *Comment 7*.
- **Memo 2:** *Comment 5*.
- **TIS:** *Trip Generation* section (pages 7 through 14), and *Appendix B*.

Note the City of Camas' engineering and development review staff have reviewed and concurred with the trip generation analyses and findings detailed in **Memo 1**, **Memo 2**, and the **TIS**.

Comment 2

Based on the hours of public operation now submitted by the applicant, new traffic generation due to commercial operations on the school campus can be expected to negatively impact student safety compared to the existing conditions. This is especially true during the PM Peak hours of 4-6 PM.

Refer to **Comment 1** regarding the zero net increase in PM peak hour trip generation. With regard to discussions on safety, refer to the following documents:

- **Memo 1:** *Comment 2*.
- **Memo 2:** *Conclusion* section.
- **TIS:** *Trip Generation* section (page 8), *Crash History* section (page 16), *Pedestrian and Bicycle Safety* section, (page 16), and the *Conclusions* section (page 17).



Comment 3

The applicant has been provided two opportunities to revise its analysis and has failed to arrive at any credible conclusions with respect to the question of “net new PM Peak hour trips.” As a result, the applicant is precluding meaningful assessment of the compatibility of the proposed commercial use with the existing high school use, with respect to the potential for negative traffic impacts on campus safety.

Refer to **Comment 1** regarding the PM peak hour trip generation analysis and findings and **Comment 2** regarding safety.

The City of Camas’ engineering and development review staff have reviewed and concurred with the trip generation analysis and safety analysis findings for the proposed USTA/CSD facility, which are detailed at length in **Memo 1**, **Memo 2**, and the TIS.

Comment 4

The existing outdoor tennis courts are not currently used by the school or the general public on foul weather days.

...

Existing weekday PM Peak hour use of the outdoor tennis courts by the general public is unscheduled drop-in use, and only occurs during good weather.

Mr. Clark and Ms. Caryn Vitek’s claims that the existing courts are not used by the general public on “foul weather days” is not supported by data or empirical evidence submitted into the record. Therefore, this claim should be considered as a statement of opinion and not fact.

It is a false statement that the general public’s use of the facilities is only “unscheduled drop-in use.” The Camas School District currently leases some of the tennis courts for use by the general public (i.e., scheduled use of the space) during the summer months when the High School typically does not use the tennis courts for an extended period of time. The leasing of tennis court space is discussed in the **TIS Trip Generation** section (page 7).

Comment 5

The applicant submitted no data confirming any level of existing PM Peak Hour public use of the outdoor tennis courts.

This is a false statement. PM peak hour trip generation for the existing outdoor facility was provided utilizing data from the *ITE Trip Generation Manual, 11th Edition*. Discussions and data regarding this analysis can be referred to in the following documents:

- **Memo 1:** *Comment 7.*
- **Memo 2:** *Comment 2.*
- **TIS:** *Trip Generation* section (pages 7 through 14) and *Appendix B.*



Comment 6

The applicant assumed all new PM Peak Hour trips to the indoor facility will be offset by existing use of the outdoor tennis courts, without any adjustments for loss of existing use on foul weather days, and without any presumed higher occupant load due to programmed, marketed and scheduled operations typical of a commercial indoor tennis center.

The analysis that Mr. Clark and Ms. Caryn Vitek are urging the Examiner to adopt is not consistent with best engineering practices and would require examining trip generation for every type of potential situation which may or may not occur, such as weather variations throughout the year. This level of analysis runs counter to general/best transportation engineering practices since it requires analyzing trip generation for situations well beyond what would be considered an average day during the year. The analysis that was prepared in the TIS provides a conservative and reasonable worst-case scenario of potential trip generation which is expected to generally be observed at the proposed USTA/CSD facility during a typical day of the year. No further analysis beyond what was submitted as part of this application is recommended or necessary in order to address transportation impacts associated with the proposed USTA/CSD facility, which are de minimis.

Refer to **Memo 2 Comment 6** for further discussion of this topic. Refer to **Comment 1** regarding PM peak hour trip generation of the existing and proposed tennis courts, as well as ITE's interpretation of how indoor and outdoor tennis court trip generation is evaluated.

Comment 7

The applicant's engineer uses the ITE manual use code 490 "tennis courts", for both the existing and proposed revised analysis, even though this code is cautioned in the ITE Manual for weak supporting data.

It is appropriate to utilize ITE land use code 490 to estimate trip generation for the existing and proposed facilities based in the code's ITE description. This topic has been discussed in detail in the following documents:

- **Memo 1: Comment 7.**
- **TIS: Trip Generation** section (pages 9 and 10)

Mr. Clark and Ms. Caryn Vitek suggesting that land use code 490 is "*cautioned in the ITE Manual for weak supporting data,*" is a false statement. At no point does the *ITE Trip Generation Manual, 11th Edition* or the *ITE Trip Generation Handbook* suggest the studies/data used to develop trip generation rates for land use code 490 are "weak" or incorrect/flawed. The *ITE Manual/Handbook* does suggest that the trip generation rates developed for land use code 490 are based on a limited sample size (i.e., studies) and subsequently should be used with caution. However, the *ITE Handbook* does indicate in situations where land use codes are based on a limited sample size that "*professional judgment must be exercised in the use of the reported data and statistics.*" In my professional transportation engineering opinion, it is generally acceptable to utilize data from land use code 490 when estimating trip generation associated with both indoor and outdoor tennis courts.

Comment 8

ITE Code 490 is not representative of the existing courts use as a "high school" athletic facility.

This is a false interpretation of the use and applicability of the ITE land use code 490 with regard to this specific development application. Detailed discussion of this topic is included in **Memo 2 Comment 1** and **Comment 2**.



Comment 9

ITE code 490 is not representative of PM Peak hour trip generation for programmed and marketed indoor tennis instruction.

This is a false interpretation of the use and applicability of the ITE land use code 490. The ITE description of land use code 490 and the *ITE Manual/Handbook* does not make a distinction whether or not “*programmed and marketed indoor tennis instruction*” is incorporated into the trip generation rates developed for this land use code. The *ITE Handbook* indicates that data used to develop trip generation rates may be based on studies conducted for similar sites, but each site may have:

- Differences in overall economic conditions at the times of data collection;
- Differences in the settings of sites studied;
- Unique characteristics of the specific sites; and
- Daily, seasonal, and geographic variations.

As previously discussed, examining trip generation for any development based on every potential situation or site variation runs counter to general/best transportation engineering practices since it requires analyzing trip generation for situations well beyond what would be considered the average. Refer to **Comment 6** for details.

Conclusion

The proposed USTA/CSD facility is expected to generate 0 additional AM and PM peak hour trips and an additional 290 average weekday trips. Note this 290 net new daily trip estimate is conservative, as it does not consider the trip generation offsets that will occur based upon (i) the school’s use of the courts for PE courses; (ii) the current trip generation associated with the existing eight tennis and two pickleball courts; or trip reductions associated with the removal of the two pickleball courts.

Since the proposed development will generate 0 AM and 0 PM peak hour trips and a low volume of new daily trips during the off-peak hours, safety and operational impacts from the proposed facility to the nearby transportation system will be minimal. Therefore, my professional opinion as a licensed State of Washington traffic engineer is that the potential trip generation for the proposed tennis facility has been accurately and thoroughly evaluated, and, as a result, I have concluded that the proposed USTA/CSD tennis facility will have a minimal impact on the overall transportation system, and no transportation safety or operational issues will be introduced with the development of this project.

If you have any questions regarding this Memorandum, feel free to contact me at daniel@lancastermoble.com or at (503) 248-0313.

