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Memorandum

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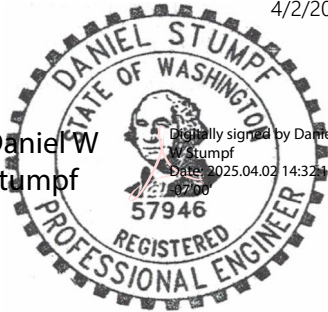
From: Daniel Stumpf, PE

Date: April 2, 2025

Subject: USTA/CSD PNW Tennis Center
Public Comments Response Memorandum 2

4/2/2025

Daniel W
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Introduction

This Memorandum responds to public comments received from Mr. Clark and Ms. Caryn Vitek of Evergreen Tennis, LLC regarding the proposed USTA/CSD PNW Tennis Center application. The comments are dated March 19, 2025 (Ex. 35 CUP24-1001) and March 25, 2025[5].¹ 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.

As explained below, the Vitek's are not professional transportation engineers licensed in the State of Washington, and they have included several assumptions in their comments that are not consistent with professional transportation engineering best practices. For example, the Vitek's insist on characterizing the proposed tennis facility as a commercial use and argue that "[t]he proposed conditional use as an indoor tennis center will *change* the use for a portion of the high school from ITE land use code 525 High School" to land use code "491 Racket/Tennis Club". March 25 Comments, p. 1. As mentioned in the USTA/CSD PNW Tennis Center Transportation Impact Study (TIS) that is being submitted concurrently with this Memorandum, in my professional opinion, one appropriate methodology for evaluating the tennis courts is to use data from the ITE land use code 490, *Tennis Courts*, as this ITE code is used to evaluate trip generation associated with covered and uncovered tennis court facilities where trip generation is tied to the number of available courts.

¹ The Vitek comment letter is erroneously dated March 25, 2024.

Additionally, the District, following consultation with City staff, employed an additional methodology based upon evaluation of current trips at the High School and Evergreen Tennis Facility. The results of this study are discussed on pages 10-14 of the April 2, 2025, *USTA/CSD PNW Tennis Center TIS* that is being submitted concurrent with this Memorandum.

While Mr. Clark and Ms. Caryn Vitek are entitled to their lay-person views and opinions, these views and opinions are not supported by professional transportation engineering expertise, and their conclusions often rest on flawed assumptions or analysis of the available information. In contrast, all of the applicant's transportation engineering analyses and professional opinions were prepared by Lancaster Mobley and are based on the professional transportation engineering expertise of a Washington state licensed engineer.

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, the *USTA/CSD PNW Tennis Center Public Comments Response Memorandum*, dated March 4, 2025, or the *USTA/CSD PNW Tennis Center Transportation Impact Study (TIS)*, dated April 2, 2025.

Comments and Responses

Comment 1

The Camas High School outdoor tennis courts were originally developed and currently used as ITE land use code 525 "Institutional - High School." For traffic generation analysis, when tennis courts are part of a high school, they are typically included within the broader land use category of the school because they are an integrated part of the high school's facilities. The trip generation characteristics for the entire high school (students, staff, events, sports and extracurricular activities) are captured under ITE Land Use Code 525, encompassing all facilities on campus, including the tennis courts.

For context when evaluating trip generation for public High Schools, most agencies often cite data from the *ITE Trip Generation Manual, 11th Edition* and utilize data from land use code 525, *High School*, based on the number of students enrolled or the capacity of student enrollment. However, not all public high schools offer the same types of amenities between one another. Specifically, focusing on Camas High School, which does offer sports facilities such as tennis courts, below are examples of two other public High Schools in Clark County that do not offer such facilities:

- Discovery High School, addressed at 5125 NW Nan Henriksen Way, Camas, Washington.
- Henrietta Lacks High School, addressed at 9105 NE 9th Street, Vancouver, Washington.

Regardless of whether or not a High School is developed with sports facilities, trip generation is evaluated between the two types of schools in the same manner when utilizing data from land use code 525 (i.e., based on the number of students).

Note the existing tennis courts at Camas High School currently generate trips that are not specifically associated with the regular operations of the school itself. During non-school hours when the High School is not utilizing the facilities, the school tennis courts are available for use by the general public regardless of whether or not users are employed by the school or have students enrolled at the school.



It's common transportation engineering practice that when a minor or site specific modification to an overall larger development occurs, often the change in trip generation associated with the minor/site specific modification will be evaluated independently of the greater use. An example of this would be if a tenant leasing space within a shopping center were to change to another type of land use (e.g., from a fast-food restaurant to a bank). In lieu of evaluating trip generation of the entire shopping center using, for example, data from ITE land use code 820, *Shopping Center (>150k)*, data from land use codes 934, *Fast-Food Restaurant with Drive-Through Window*, and 912, *Drive-In Bank*, may be used to evaluate the site specific change.

Comment 2

A repeated error in the applicant's submitted traffic analysis, and during testimony at the March 20 hearing, is the statement that the existing eight outdoor courts at Camas High School are currently land use code 490 "Tennis Courts". ITE Land Use Code 490 applies to independent or public tennis courts that are not associated with a larger facility, such as a school, park, or recreational complex. These courts have distinct trip generation patterns, which differ from those integrated within a school.

This is a false interpretation of the use and applicability of the ITE land use code 490, and of the trip generation methodologies described in the *ITE Trip Generation Manual, 11th Edition* and the *ITE Trip Generation Handbook, 3rd Edition*. According to the ITE description of land use code 490:

Tennis courts are indoor or outdoor facilities specifically designed for playing tennis. Tennis courts can either be public or private facilities and do not typically include any ancillary facilities other than limited spectator seating.

At no point does the ITE description of land use code 490 or the ITE manual/handbook suggest data from this land use code only "applies to independent or public tennis courts that are not associated with a larger facility."

Comment 3

The existing outdoor tennis courts were not developed and do not operate separately from the high school. There is no existing dedicated public access or parking, as a separated development would have. The correct and only ITE land use code to apply to the existing condition at all of the high school's athletic facilities is "Institutional - High School" ITE Land Use Code 525.

These are false statements for the following reasons:

- The courts can be operated by non-school affiliated groups and are currently available for use by the general public during non-school use hours. Refer to **Comment 1** and the *Trip Generation* section of the *USTA/CSD PNW Tennis Center TIS* for details.
- The High School and its associated parking lots/drive aisles and access driveways are owned/operated by the Camas School District which is a public (not private) entity. Public access to the tennis courts is available via three driveways along SE 15th Street and a driveway along NE Garfield Street. The proposal will include the construction of off-street parking spaces that will be dedicated for use by the proposed USTA/CSD facilities.
- Refer to **Comment 1** and **Comment 2** regarding the use of ITE codes 490 and 525.



Comment 4

The proposed conditional use as an indoor tennis center will change the use for a portion of the high school from ITE land use code 525 "High School" to land use code 491 "Racket/Tennis Club."

This is a false statement. Refer to **Comment 1** regarding the use of ITE code 525. Refer to the *Trip Generation* section of the *USTA/CSD PNW Tennis Center TIS* with regard to the lack of applicability for utilizing data from land use code 491 to represent trip generation of the proposed USTA/CSD facility.

Comment 5

We calculate that the difference in proposed vs. existing land uses will result in an increase to the expected trip generation of 430 net new average Daily trips, along with 38 net new PM Peak Hour trips, as calculated below. This is above the City of Camas threshold of 200 net new Daily trips that requires a TIA/TIS to be prepared.

Mr. Clark and Ms. Caryn Vitek are incorrectly evaluating trip generation of the existing and proposed tennis court facilities. A TIS was submitted to the City of Camas as part of this development application. Refer to the *Trip Generation* section of the *USTA/CSD PNW Tennis Center TIS* regarding trip generation of the tennis court facilities.

With development of the USTA/CSD tennis center, there are three potential trip generation scenarios that are expected to generally occur:

1. Public trips to/from the tennis center when school is in session during the fall and spring tennis seasons. During these times, USTA operations will be limited by PE classes use during the day; closure during the school's afternoon bell period, which begins at approximately 2:30 PM to 3:30 PM; and use by the tennis teams from approximately 3:30 PM to 6:00 PM for meets and practices.
2. Public trips to the tennis center when school is in session outside of tennis seasons. This scenario matches the operation of the scenario above (Scenario 1), albeit in lieu of the school's tennis programs using the tennis courts from 3:30 PM to 6:00 PM, the courts will be open for use by the general public during this period.
3. Public use during holidays and summer school closure. In this scenario the USTA would likely have the longest hours of operation (from 7:00/8:00 AM to 8:00/10:00 PM) but since there would not be significant student or staff trips to the campus, the overall trip generation of the entire school campus would be considerably lower than typical. In addition there is currently regular summer use of up to four of the tennis courts for third-party camps, and total trip generation would be constrained by the number of available courts, which is not increasing.

Regarding the above three scenarios, Scenarios 1 and 2 will experience the greatest potential for net new trip generation associated with the proposed USTA facility. This is because during school days the tennis courts are currently closed to the general public during school hours. With construction of the USTA facility, the courts will be open for use by the general public during the school hours between 9:00 AM to 2:30 PM. This will result in net new trips to/from the tennis courts which currently do not occur under existing conditions. Additionally, extended use hours and associated trip generation from 6:00 PM to 10:00 PM were incorporated into the TIS trip generation analysis to account for extended use hours of USTA facility during low-light times of the mid-fall to mid-spring period. Note that no new PM peak hour trip generation will occur with development of the USTA facility for the following reasons:



- During the school tennis seasons, no public use of the courts will be permitted. The High School will have priority use of the courts from 3:30 PM to 6:00 PM. During this time the tennis courts do generate PM peak hour trips by associated with students, coaches, spectators, and match officials traveling to/from the courts. However, since these trips currently exist without the USTA facility no new PM peak hour trip generation will occur.
- During the period outside of the High School's tennis seasons, the tennis courts are currently available for use by the general public without restriction (e.g., no strict permission needed to use the courts and no "pay to play" barriers that the USTA will implement). With exception to the "pay to play" barrier, no changes to the general public's ability to access and use the tennis courts will occur during the PM peak period with development of the USTA facility. Therefore, no new PM peak hour trip generation will occur.

Comparatively Scenario 3 will not result in any new daily or peak hour trip generation relative to the trip generation currently generated by the existing tennis courts. This is because the existing courts and the proposed courts are both available for use by the general public without restrictions imposed by the Camas School District.

Note, the *ITE Trip Generation Manual* does not distinguish a difference in trip generation between covered and non-covered courts, rather the controlling variable that most significantly influences tennis court trip generation is the number of courts. Based on the *ITE Trip Generation Manual*, the proposed USTA facility (eight tennis courts) will not generate more trips than the eight existing tennis courts and two existing pickleball courts.

To reiterate from the TIS,

...[the] trip generation analysis [in the TIS] provides the most conservative estimate of new site trips generated by this proposed development for the following reasons:

- *As previously stated before, since the existing tennis facilities are currently open for use by the general public during non-school use hours, any increases in site trip generation are generally expected to occur during school days when the high school typically uses the facilities. This is because the existing tennis facilities are closed to the general public during school use hours or when classes are in session. For non-school use hour periods, the general public is allowed to use the tennis courts without restriction, regardless of whether or not the proposed USTA/CSD project is developed.*
- *The analysis takes into consideration trip generation associated with extended tennis court use hours between 6:00 PM to 10:00 PM (or other closing period). This accounts for the predictable occurrence of shorter daylight hours between late Fall through early Spring, and the subsequent shorter use period of the courts during this time of year.*



Comment 6

Because the proposed use is indoors and the existing use is outdoors, further corrections to the existing use estimate are necessary to remove outdoor indement weather days. We used the 20 year average rain probability during the Boys Fall season and Girls Spring season (see Attachment B for data). The Boys Fall season shows a 26% probability of existing use getting rained out (16 of 61 rainy days in September and October) and the Girls Spring season shows a 41% probability of existing use getting rained out (25 of 61 rainy days in March and April). For purposes of calculation, an average rain out probability for both seasons of 33.5% is used.

...

We note that in summer months (July and August) it is typically too hot in the afternoon to play or practice on uncovered outdoor tennis courts, and in the winter (Nov-Feb), the probability of rain in Camas on any given day climbs to an average of 43% and the outdoor courts generally do not dry out enough to support any after school uses in the winter months.

It is not best transportation engineering practice to evaluate the needs of the transportation system for every potential event that may or may not occur with irregular or unpredictable frequency. This is because there is a reasonable limit as to how the transportation system should be designed to accommodate traffic, from both a practical and financial perspective, and to avoid unnecessarily overdesigning the system. As examples, most agencies and practitioners analyze and design the transportation system to accommodate traffic as follows:

- For intersection Level of Service (LOS) the City of Camas requires a minimum LOS C or better on minor and local streets and LOS D or better on collector/arterials streets during the AM and PM peak hours of a typical mid-weekday (i.e., not to require intersections to operate no less than LOS A).
- Evaluate and design intersections to accommodate the 95th percentile queues that may occur at an intersection during the AM and PM peak hours of adjacent street traffic for a typical mid-weekday (i.e., not design an intersection to accommodate the maximum possible queue that could form at an intersection at any given time of the day or day of the year).
- Evaluate the 85th percentile roadway speed to determine an appropriate design for the roadway (i.e., not to design the road to accommodate for the maximum observed vehicle speed on the road).

With respect to trip generation, the ITE develops trip generation rates for a variety of land uses by collecting traffic volume data at similar uses and averaging the number of trips generated based on variables, such as building square footage, students, dwelling units, etc. Note the Attachment A that was submitted in Mr. Clark and Ms. Caryn Vitek's March 25, 202[5] memorandum indicates for each land use code the "ITE Average PM Peak Hour Trip Rate" is provided and used to estimate trip generation. This data is collected under a variety of circumstances (e.g., during hot or cold weather, rain or dry periods, during Spring, Fall, Summer, or Winter, etc).

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.

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.

