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Memorandum

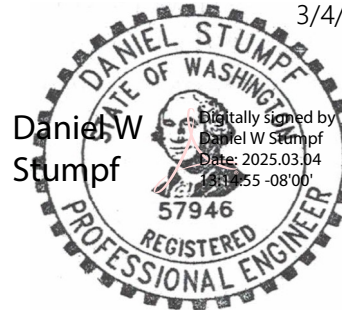
To: James E Carothers, City of Camas
 Anita Ashton, City of Camas

From: Daniel Stumpf, PE

Date: March 4, 2025

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

3/4/2025



Introduction

This memorandum serves as a supplemental analysis and response to public comments received and issued by City of Camas staff for the proposed USTA/CSD PNW Tennis Center application. Public comments addressed in this response memorandum generally pertain to the *USTA Tennis Center Trip Generation Study*, dated September 19, 2024, and were posed by Clark and Caryn Vitek of Evergreen Tennis, located at 5225 NW 38th Avenue. Transportation related comments are directed toward trip generation methodologies, operational hours of the proposed USTA/CSD facility, and transportation safety.

The following sections include additional analysis conducted by the applicant, which further reviews site trip generation, and discussion of key 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 supplemental analysis in this memorandum may serve as an addendum to the *USTA Tennis Center Trip Generation Study*.

Supplemental Analysis

Based on subsequent correspondence with the Camas School District after initially preparing the trip generation study for the application, the hours of operation of the USTA/CSD facility have been adjusted. Although subject to change, during the regular school tennis seasons the USTA/CSD facility may utilize the facilities from approximately 9:00 AM to 2:30 PM, and from approximately 6:00 PM to close. The intent of scheduling these hours is to:

- Avoid the AM bell time, which occurs at 8:45 AM, and the associated school traffic congestion which occurs before and after.

- Avoid the PM bell time, which generally occurs at 3:15 PM (notwithstanding the once a month Wednesday early release time of 1:00 PM), and the associated school traffic congestion which occurs before and after.
- Allow the Camas High School tennis programs priority use of the courts, where practices are held between approximately 4:00 PM to 6:00 PM and meets are held between approximately 3:30 PM to 6:00 PM.

Additionally, the school’s PE courses will be allowed preferential use of the courts when needed. Based on correspondence with school district staff, it is estimated PE classes may occupy approximately four of the eight tennis courts.

As described in the application’s trip generation study, to estimate trip generation of the USTA/CSD facility traffic count data was collected at the Evergreen Tennis Center on Tuesday, August 13, 2024, over a 24-hour period. Noting the Evergreen Tennis Center operates with four tennis courts, trip generation rates on a per court basis were calculated. The following is an updated version of Table 3 from the 2024 study which revises the “Off-School Hours” row of the Evergreen Tennis Center’s trip generation.

Table 1: Evergreen Tennis Center Trip Generation Summary

Analysis Period		Evergreen Tennis Center Trips			Number of Courts	Trips Generated per Court		
		Entering	Exiting	Total		% Entering	% Exiting	Rate [Trips/Court]
AM Peak Hour	7:15/7:30/ 7:45 AM - 8:15/8:30/ 8:45 AM	8	0	8	4	100%	0%	2.00
PM Peak Hour	5:00 PM - 6:00 PM	14	13	27	4	52%	48%	6.75
Daily Total	12:00 AM - 12:00 AM	108	110	218	4	50%	50%	54.50
Off-School Hours (Outside Bell Times)*	6:00 PM - 8:00 AM	12	16	28	4	43%	57%	7.00
During School Hours*	9:00 AM - 2:30 PM	65	52	117	4	56%	44%	29.25
Total USTA Use Hours*		77	68	145	4	53%	47%	36.25

* Camas High School's regular bell times occur at 8:45 AM and 3:15 PM, noting the school's tennis program may continue through 6:00 PM. USTA may use the proposed tennis court facilities between the hours of 9:00 AM - 2:30 PM to avoid school traffic congestion, and from 6:00 PM to close.



As described in the *Existing School and Proposed Facility Operations* section of the 2024 trip generation study and incorporating the revisions to the USTA's allowed hours of use, the proposed USTA/CSD facility will operate as follows:

- The facility will be open to the general public during school hours between 9:00 AM to 2:30 PM. This time period takes into consideration the need to avoid school traffic congestion associated with the school bell times (i.e., congestion which may start at approximately 8:00 AM and 2:30 PM), and noting the school's tennis programs may continue using the facilities through 6:00 PM.
- No new AM or PM peak hour trips to/from the USTA/CSD facility are assumed to be generated during the regular school tennis season per the reasoning below:
 - Although a portion of the AM peak hour trips generated by the Evergreen Tennis Center occur prior to 8:00 AM, the facility opens at 8:00 AM on weekdays whereby these trips (both staff and player entering trips) will not occur at the proposed USTA/CSD facility during this time period. Instead, these trips were assumed to shift over to the hour between 9:00 AM to 10:00 AM.
 - The school will be allowed preferential use of the courts between the hours of 4:00 PM to 6:00 PM, whereby no PM peak hour trip generation from USTA can occur.
- The proposed USTA/CSD facility will not generate more trips than the school's tennis program. This is because the number of courts available for use by the USTA, the Camas School District, or the general public does not change (i.e., the capacity, or number of tennis players, using the facility will be limited by the fixed number of available/open courts).
- Although the high school may use approximately half of the tennis courts during the day for PE courses (i.e., between 9:00 AM – 2:30 PM), for the purposes of this analysis it is assumed the USTA will be allowed full use of all eight tennis courts.

Based on the above, 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 and does not consider the school's use of the courts for PE courses, 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. The updated trip generation analysis is summarized in Table 4.



Table 2: Trip Generation Analysis Summary

Analysis Period	Number of Courts	High School Trips		
		Entering	Exiting	Total
<i>Existing Conditions (Camas High School)</i>				
AM Peak Hour	8 courts	868	394	1,262
PM Peak Hour	8 courts	238	189	427
Daily Total	8 courts	2,575	2,573	5,148
<i>Proposed USTA/CSD Facility</i>				
AM Peak Hour	8 courts	0	0	0
PM Peak Hour	8 courts	0	0	0
Daily Total	8 courts	154	136	290
<i>Total Trips Generated</i>				
AM Peak Hour	8 courts	868	394	1,262
PM Peak Hour	8 courts	238	189	427
Daily Total	8 courts	2,729	2,709	5,438
<i>Percent Increase in Site Trip Generation</i>				
AM Peak Hour	-	0.00%	0.00%	0.00%
PM Peak Hour	-	0.00%	0.00%	0.00%
Daily Total	-	5.98%	5.29%	5.63%



Evergreen Tennis (Clark and Caryn Vitek)

Comment 1 – Email Dated January 22, 2025

The SEPA report mentions 56 weekday trips and 0 peak hour trips. This is highly suspect. Based on 8 courts, I estimate there will be at least 32 trips per 60-90 minutes during all hours of operation, and some of these will be peak hour trips.

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It was an error by the City to accept the traffic information provided as technically complete when it is obviously incorrect, grossly misleading, or deliberately false on the part of the applicant. The trip counts provided by the applicant to the City in its SEPA package, section 14(e) stated 54 new daily trips and zero peak hour trips. These values were picked up and repeated in the local newspaper ("Camas High School's tennis court revamp gets environmental OK from City", January 10, 2025 edition). The city should not have accepted this traffic study and moved the application forward to public hearing because the submitted values grossly differ from what would be suggested by using the ITE Trip Generation Manual, 11th Edition, Land Use Code 491, which is 3.82 net new trips per court per hour. Utilizing the ITE manual, it is likely the projected trips are 6 to 7 times higher than that reported by the applicant and now circulated in the press.

The trip estimates in the SEPA report were based on the "net new trips" generated by the eight proposed covered tennis courts relative to the eight existing tennis courts plus the two pickleball courts (both pickleball courts will be removed). These trip numbers are additional trips that will be added to the transportation system beyond what the existing tennis and pickleball courts are estimated to generate. Since no new courts will be constructed (i.e., generally no additional capacity for tennis players/users of the courts will be created), only an increase in daily trip generation is expected by extending the tennis court operation period into the evening hours between mid-Fall to mid-Spring when daylight hours are shorter. Note that after preparing the 2024 trip generation study, the Camas School District notified Lancaster Mobley that the USTA may operate within the proposed tennis facilities from approximately 9:00 AM to 2:30 PM, subsequently allowing general public use of the facilities during these school day hours. With this change in available hours of use by the USTA, the daily trip generation estimates were increased to 290 net new trips.

Note that no trip reductions associated with the removal of the pickleball courts were considered. Therefore, the "net new trip" estimates provided in the SEPA report, notwithstanding the subsequent 290 net new daily trips revision, may be considered conservative estimates of the net new trips the proposed facility will generate. If basing trip generation on the number of courts and using data from ITE code 491, *Racquet/Tennis Club*, the number of trips generated by the proposed tennis court facility should decrease with the removal of the two pickleball courts.

For clarification on the reference to the ITE Trip Generation Manual, 11th Edition, data from land use code 491 indicates 3.82 "PM peak hour of adjacent street traffic" trips will be generated. This means during the "peak one hour" of traffic between 4:00 PM and 6:00 PM approximately 3.82 trips may be generated per court based on data from land use code 491. This does not mean 3.82 trips will be generated per court "per hour" throughout the day.



Comment 2 – Email Dated February 10, 2025

As examples I can send you: Kirkland and Lake Oswego indoor court projects both use 38.75 trips per court per day (3.2 to 3.4 per court PM peak hour). The City of Camas approved Evergreen Tennis (Camas 2013) also used the ITE manual for calculations. Based on the 10 courts of the Camas High project the basic ITE calculated number would be 38.2 new trips per hour of conditioned operation for the full facility, not 54 per day... This traffic will be driving through the high school parking lot, probably during a lot of the same hours the kids will be there... In this case the applicant has potentially significantly minimized the traffic impact in its representations to the city and the public.

The following provides a few clarifying points about the aforementioned studies and comments:

- Both studies referenced above are dated August 2010 and February 2013. The current ITE Trip Generation Manual, 11th Edition, was published in September 2021. The trip generation estimates described in both studies appear to rely on outdated data from ITE Trip Generation Manuals that are two to three editions removed from the current 11th Edition.
- The proposed facility will be consist of eight tennis courts, not ten courts.
- The 54 trips per day estimate is the “net new daily trips” generated by the proposed eight tennis court facility relative to the existing eight tennis court and two pickleball court facility. Note this estimate was updated to 290 “net new daily trips” based on subsequent correspondence with the school district and the change in hours the USTA is allowed to use the facilities.
- As described in **Emails from Clark Vitek Comment 1**:
 - Data from land use code 491, *Racquet/Tennis Club*, indicates 3.82 “PM peak hour of adjacent street traffic” trips will be generated per court, not 3.82 trips “per hour”.
 - If basing trip generation on the number of courts, the overall trip generation of the USTA/CSD facility should decrease with the removal of the two pickleball courts. To maintain a conservative estimate of potential net new trip generation, no trip reductions were considered with the removal of the pickleball courts.
- Regarding traffic traveling through the school parking lot while students are present, the proposed facility will operate between the hours of approximately 9:00 AM (after the AM bell) and approximately 2:30 PM (before the PM bell time and prior to when the Camas High School tennis teams are scheduled to use the facilities). Therefore, a majority of trip impacts will occur when students are either in class or off-campus. Additionally, the overall daily trips generated by the proposed tennis facility will be significantly less than those generated by the high school. Based on this evaluation limited safety or operational issues associated with traffic from the tennis courts are expected to occur.



Comment 3 – Email Dated February 10, 2025

If allowed to proceed to public hearing without requiring the applicant to provide more complete information on proposed hours of operations, and complete/correct the traffic impact calculations, this may be viewed as procedural bias on the part of City Planning..

Although subject to change, during the regular school tennis seasons the USTA will be allowed to utilize the facilities from approximately 9:00 AM to 2:30 PM, and from approximately 6:00 PM to close. The intent of scheduling these hours is to:

- Avoid the AM bell time, which occurs at 8:45 AM, and the associated school traffic congestion which occurs before and after.
- Avoid the PM bell time, which generally occurs at 3:15 PM, and the associated school traffic congestion which occurs before and after.
- Allow the Camas High School tennis programs priority use of the courts, where practices are held between approximately 4:00 PM to 6:00 PM and meets are held between approximately 3:30 PM to 6:00 PM.

The 2024 trip generation study did not consider the possible use of the proposed USTA/CSD facilities between the hours of approximately 9:00 AM to 2:30 PM. Therefore, daily trip generation estimates were re-evaluated as described in the **Supplemental Analysis** section of this memorandum.

Comment 4 – Email Dated February 10, 2025

As supporting data, here is our trip count this week at Evergreen Tennis (4 courts). We have a scheduling system that gives me players names which I counted. Everyone comes in their own car, each player visit = 2 trips, one incoming and one outgoing. Weather permitting these are a typical weekday snapshot for us.

Evergreen Tennis (2/10/2025 – 2/14/2025, scheduled)

- | | | |
|------------------------|----------------------------|---------------------------------|
| • Monday: 212 trips | • Thursday: 160 trips | • Average/day/court: 49.8 trips |
| • Tuesday: 200 trips | • Friday: 180 trips | • Average/hr/court: 3.86 trips |
| • Wednesday: 244 trips | • Average/day: 199.2 trips | |

Note that the ITE Trip Generation Manual cited below (11th edition), Land Use Code 491 provides 3.82 per court per hour.

Traffic counts used to develop the trip generation estimates in the application's trip generation study was based on data collected at the same Evergreen Tennis facility. Data was collected on Tuesday, August 13, 2024, over a 24-hour period. Based on the collected data, the Evergreen Tennis facility was found to generate the following:

- 8 AM peak hour trips (2 AM peak hour trips per court).
- 27 PM peak hour trips (6.75 PM peak hour trips per court).
- 218 average daily trips (54.5 average daily trips per court).

The collected data approximately matches the estimates provided by the concerned party. These estimates were used to calculate the net new trips generated by the proposed USTA/CSD facility, relative to the existing tennis and pickleball courts.



Regarding the ITE Trip Generation Manual, 11th Edition, trip generation rate, refer to **Emails from Clark Vitek Comment 1**. For the process used to evaluate net new trips generated, refer to the **Supplemental Analysis** section.

Comment 5 – Email Dated February 10, 2025

Once the actual proposed weekday operating hours are provided by the applicant this strongly suggests using the ITE provided 3.82 per court per hour as the expected basic trip count for the USTA Camas High School 10 court project, i.e. 38 or 39 trips per hour, not 54 per day.

Refer to **Emails from Clark Vitek Comment 3** regarding USTA’s hours of use at the proposed facility. Refer to **Emails from Clark Vitek Comment 1** regarding the number of tennis courts that will be incorporated in the development of the proposed USTA/CSD facility.

Regarding the use of the ITE Trip Generation Manual, it was discussed with the City of Camas prior to preparing the trip generation study that utilizing data from either land use code 490, *Tennis Courts*, or 491, *Racquet/Tennis Club*, based on the number of courts would yield no increase in site trip generation because no new tennis courts are being constructed. On the contrary, with the removal of the two pickleball courts this method of trip generation would show a decrease in expected site trips generated between pre- and post-development scenarios. Since the construction of the covered facility could extend the hours of use of the courts during night hours or periods of inclement weather, and because the USTA/CSD facility will allow public use of the facility for a portion of the school day, the intent of using trip generation data from the existing Evergreen Tennis facility and superimposing those trips generated on top of the school’s existing trip generation was considered. However, because the USTA is not allowed by the school district to use the facility at/near the AM and PM school bell times or during the periods when the high school tennis program is in session (i.e., the mid-afternoon to early evening hours), no new AM or PM peak hour trips will be generated by the proposed facility, and only a portion of the daily trips generated by Evergreen Tennis were applied to the proposed facility.

Note the net new daily trip estimate (revised in the **Supplemental Analysis** section of this memorandum) is a conservative estimate by not considering the school’s use of the courts for PE courses, 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.

Comment 6 – Email Dated February 13, 2025

thanks again. Here are the Kirkland (4 court) and Lake Oswego (8 court) studies referenced (excerpts as attachments, and both from publicly available documents).

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the study provided in the original application is simply not credible with respect to total new trips, and the PM peak hour claim of zero trips should be enforced with conditioned operating hours if applicant is claiming to have no trip ends due to no operations open to the public, all seasons, during the PM peak hour. This is highly doubtful claim on its own.

Regarding the Kirkland and Lake Oswego studies, as well as the net new trips that will be generated by the proposed USTA/CSD facility relative to the existing eight tennis courts and two pickleball courts, refer to **Emails from Clark Vitek Comments 1, 2, and 5**



Comment 7 – Email Dated February 21, 2025

The applicant's study submitted showed 27 PM Peak Hour trips for 4 courts, which could be expected to scale to 68 PM Peak hour trips for the 10 court project proposed (8 tennis and 2 pickleball). It should be noted that the study was conducted during summer break for the schools (August 12, 2024), so the claim that no PM peak hour trips would be introduced at the High School due to school use from 3-6 PM would be invalid. In fact, the school's tennis season only runs about 4 months per year, so the claim of "no PM Peak hour trips" due to school use 3 PM - 6 PM would be not valid for 8 of 12 months. The suggestion that undercovered courts have credits for existing PM Peak hour trips is also invalid because the courts are not generally used by the public (it is not a park) and all-weather year round operations is a use change from current use during good weather only. In summary, The proposal to cover the courts and operate year round as a commercial center will certainly generate some new PM Peak hour trips compared to existing conditions.

As described previously in the memorandum, the proposed USTA/CSD facility will include the removal of the two pickleball courts while maintaining the eight existing courts. Aside from removing the pickleball courts, the only physical change to the existing tennis court facilities will be the construction of a covered/enclosed structure around the courts. The proposed development "will not" retain 10 courts and therefore the scalable trip generation estimate described above is inaccurate. No new courts are being constructed whereby actual trip generation should theoretically decrease based on the argument described above (i.e., [8 proposed courts - 10 existing courts] × [27 PM peak hour trips ÷ 4 courts] = -13 to -14 PM peak hour trips).

The potential issue raised with the collection of traffic counts at the Evergreen Tennis center during Camas High School's Summer break has no relevance. The Evergreen Tennis facility operates independent of Camas High School, whereby trip generation associated with the high school has no influence on the trip generation associated with the Evergreen Tennis center, or vice versa.

The Camas High School boys' and girls' tennis programs operate during the Fall and Spring terms of the school year. During the off-season of the school's tennis programs the courts are open for general use by the public. To counter the argument that the covered USTA/CSD facility would generate new (i.e., more) PM peak hour trips compared to existing conditions:

- The Camas High School tennis programs will be given priority use of the courts, where practices are held between approximately 4:00 PM to 6:00 PM and meets are held between approximately 3:30 PM to 6:00 PM. During this period no new PM peak hour trip generation can occur.
- An argument could be made that the USTA/CSD facility could generate fewer trips on a per tennis court basis than the existing "open to public use" tennis courts. This is because the USTA/CSD facility would require an access fee for use of the facilities, which could dissuade some members of the general public from using the school tennis courts in lieu of other "free use" facilities in the area. The notion that a "free use" tennis court facility could generate more trips than a "members or fee only" facility is supported by data in the ITE Trip Generation Manual, 11th Edition:



- ITE Code 490, Tennis Courts
 - ITE Description: *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.*
 - PM Peak Hour Trip Generation Rate: 4.21 trips per tennis court.
- ITE Code 491, Racquet/Tennis Club
 - ITE Description: *A racquet/tennis club is a privately-owned facility that primarily caters to racquet sports (tennis, racquetball, pickle ball, handball, squash) both indoor and outdoor. This land use may also provide ancillary facilities, such as a whirlpool, sauna, spa, weight room, snack bar, or retail store. Some sites offer daycare. Some sites offer competitive team sports. These facilities are membership clubs that may allow access to the general public for a fee.*
 - PM Peak Hour Trip Generation Rate: 3.82 trips per tennis court.

If using the higher trip generating ITE code 490 in lieu of code 491 to represent both the existing “free use” courts and the proposed USTA/CSD courts, no new increase in trip generation will occur, notwithstanding the two pickleball courts that will be removed. Based solely on this ITE data, the proposed tennis court facility is not projected to generate additional new PM peak hour trips beyond what is currently generated.

Evergreentennis.net Memorandum

1. Traffic Impact: The submitted Traffic Impact Statement (page 4 Analysis Findings) contains the following: "The facility will be closed to the general public during school hours. The regular school bell time is scheduled between 8:45 AM - 3:15 PM, noting the school's tennis programs may continue using the facilities through 6:00 PM." As a result of these restricted hours, the traffic impact was stated to be "56 new trips per day and none during the PM peak hour (5-6 PM)". This calculation assumes trips generated only after 6 PM and before 8 AM year round. We note that if the facility is opened to the public during the school day in the future, Table 3 of the District's commissioned study would calculate up to 545 new trips per day, almost 10 times higher than previously stated. We believe the school board and our community should fully understand the potential for increased traffic that commercial operations on the High School campus could introduce. If the proposed tennis center is intended to be open during school hours, the school board, the city, and the public should be made aware of this impact.

The USTA use hours of the proposed courts has changed since preparing the application's 2024 trip generation study. The updated operation hours of the USTA/CSD facility and the resulting trip generation estimates are described in the **Supplemental Analysis** and **Emails from Clark Vitek Comment 1** sections of this response memorandum. To summarize, the proposed USTA/CSD facility is expected to generate 0 net new AM and PM peak hour trips, and 290 net new daily trips. Note this 290 net new daily trip estimate is conservative and does not consider the school's use of the courts for PE courses, 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.



Regarding the 545 new trips per day estimate provided in the evergreentennis.net memorandum, the estimate assumes that 10 new tennis courts will generate 54.50 new daily trips per court. This 54.50 daily trips per court rate was referenced from Table 3 of the application's 2024 trip generation study, where data was collected over a 24-hour period at the Evergreen Tennis facility. There are several flaws with the assertion that the proposed USTA/CSD facility will generate 545 new daily trips if the courts were completely opened to the public throughout the day:

- The new daily trip estimate does not consider the number of daily trips currently generated by the high school's existing eight tennis courts and two pickleball courts. The above analysis assumes no trips are currently generated by the existing courts.
- The above estimate assumes USTA will have sole use of the facility, and Camas High School will not use the facilities for their tennis programs or PE courses, and will allow USTA to operate during the school bell times when traffic congestion is present in the area.
- The proposed USTA/CSD facility will consist of eight tennis courts, not ten. No new courts are being constructed, rather, two pickleball courts are being removed. Assuming the Camas School District relinquishes all rights to use the proposed USTA/CSD courts, and the existing eight tennis courts and two pickleball courts do not currently generate any trips, at most the facility may generate 436 new daily trips.

Conclusion

Based on the additional transportation analysis and evaluation of local concerns, the proposed USTA/CSD tennis courts 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.

