

## Madeline Sutherland

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**From:** David Jardin <David.Jardin@clark.wa.gov>  
**Sent:** Wednesday, May 4, 2022 3:30 PM  
**To:** Curleigh (Jim) Carothers  
**Cc:** Robert Maul; Madeline Sutherland; Anita Ashton  
**Subject:** RE: comments out on Nextdoor - Camas Heights (formerly called NE 28th Street Subdivision)

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Good Afternoon:

Thank you for the opportunity to comment.

I have been trying to use the reference information links that were provided by Mr. Miles to see what he was seeing with regard to the crashes he reports between 1/1/19 and 3/31/22.

I am unable to replicate the 7 crashes Mr. Miles reports are found on the WSP collision query tool he used. Did he provide a hard copy or a screen capture so we can see his inputs?

I have tried different entry combinations and there is only a single crash listed at the intersection of NE 28<sup>th</sup> Street/NE 232<sup>nd</sup> Avenue 4/24/21 (EB25741).

This crash appears to be due to an inattentive driver that did not obey the traffic control. These types of crashes cannot typically be mitigated.



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Query Results - 1 Records Returned

Collision Date Range: 1/1/2015 - 3/31/22

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Collision Report Number	Collision Date/Time	County	City	Jursidiction	Agency	Primary Traffic Way	Secondary Traffic Way
EB25741	4/24/2021 10:01:00 PM	Clark	Camas	County Road	County Sheriff	NE 28TH STREET	NE 232ND AVENUE

Rows per Page: 20 [50](#) [100](#) [250](#)

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However using the tools county staff has available, staff was able to validate the applicant's reported crashes. Staff also reviewed the available crash history between 1/1/19 and 12/31/21 finding a total of 7 crashes reported at the intersection of NE 28<sup>th</sup> Street/NE 232<sup>nd</sup> Avenue. County staff then looked at the collision types, as reported, looking for trends that would suggest mitigation could be implemented to reduce the potential for a specific crash trend. County staff concluded that there are no crash trends at the intersection of NE 28<sup>th</sup> Street/NE 232<sup>nd</sup> Avenue indicative of safety issues that could be mitigated.

The Institute of Transportation Engineers (ITE) *Traffic Access and Impact Studies for Site Development – A Recommended Practice* states that “Accident rates vary, but any intersection will more than one accident per million entering vehicles is worth of additional analysis.” This ITE recommended practice has been used by county staff to determine the scope, or level of analysis required regarding crash history. Because of this, a crash rate of one crash per million entering vehicles has become the threshold to determine if further crash history evaluation is warranted. This is provided that staff has not identified a crash trend that would be exacerbated by the development regardless of the threshold.

The applicant's traffic study analyzed the crash history as obtained from the Washington State Department of Transportation (WSDOT) for the period between January 2015 and December 2019 for the intersection under county jurisdiction.

The study concluded that intersection crash rates for the study intersections do not exceed one crash per million entering vehicles and do not warrant additional analysis. Staff concurs with the applicant's findings. Therefore, no further analysis is required.



**David Jardin**

Concurrency Engineer

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**From:** Curleigh (Jim) Carothers <jcarothers@cityofcamas.us>

**Sent:** Wednesday, April 13, 2022 11:34 AM

**To:** David Jardin <David.Jardin@clark.wa.gov>

**Cc:** Robert Maul <RMaul@cityofcamas.us>; Madeline Sutherland <MSutherland@cityofcamas.us>; Anita Ashton <AAshton@cityofcamas.us>

**Subject:** FW: comments out on Nextdoor - Camas Heights (formerly called NE 28th Street Subdivision)

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David,

FYI, below is a comment about the traffic study for Camas Heights. Specifically, I was wondering if you could address the County's stance on any potential mitigation requirements for the intersection of NE 232<sup>nd</sup> Avenue and 28<sup>th</sup> Street. Any information that you could provide would certainly help for the upcoming public hearing on May 4.

Thank you.



**James E Carothers, PE**

Engineering Manager/City Engineer

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**From:** Robert Maul <RMaul@cityofcamas.us>

**Sent:** Tuesday, April 12, 2022 3:19 PM

**To:** Madeline Sutherland <MSutherland@cityofcamas.us>; Anita Ashton <AAshton@cityofcamas.us>; Curleigh (Jim) Carothers <jcarothers@cityofcamas.us>

**Subject:** comments out on Nextdoor

**Ken Miles**

• Proebstel  
Author

Attention Neighbors: The hearing originally planned for 4/10 has been postponed to Wednesday, May 4 @ 5:00 PM. Here is an updated link to the hearing notice and project documents: <https://www.cityofcamas.us/com-dev/page/notice-application-public-hearing-sub21-01-camas-heights-subdivision>. Unfortunately, NextDoor will not let me edit and correct the original post with this new info; so we'll have to settle for this comment as an

“alternative edit”. Hopefully, this will not be unduly confusing. Of course, the hearing is not about “whether there should be development on this property.” That debate concluded long ago, and it is all zoned R-10 today. Rather, this is an invitation to the public to provide input, and recommend adjustments, if any, to the plan before the City gives the final green light. Some potential comment topics could include whether the project is in good alignment with Camas’ long term plans ([https://www.cityofcamas.us/sites/default/files/fileattachments/community\\_development/page/5841/compplan2016.pdf](https://www.cityofcamas.us/sites/default/files/fileattachments/community_development/page/5841/compplan2016.pdf)) and its current municipal codes ([https://library.municode.com/wa/camas/codes/code\\_of\\_ordinances](https://library.municode.com/wa/camas/codes/code_of_ordinances)) and with state guidelines such as the “SWMMWW” (<https://apps.ecology.wa.gov/publications/documents/1910021.pdf>) as has been mentioned over in Tree Protectors. BTW: The Camas Tree Protectors pages are world-readable and you do not need an FB account to view the tree-related discussion there (<https://www.facebook.com/groups/2101496163399160>). But you would need one to engage with the conversation of course. Also, I have been informed that this will be an “online” public hearing and there will not be an in-person option.

The traffic study for the Camas Heights proposal concludes that the nearby intersection of NE 28th St. and 232nd Ave does not need any attention in light of this development. However, it cites collision data up through December 2019 only. When we incorporate the most recent data available, we get hints that perhaps the intersection needs some attention after all. When the original Green Mountain Master Plan Development was proposed, the Transportation Impact Analysis of 11/2014 showed that the nearest intersection of Goodwin and Ingle was already at a collision rate of 1.03 crashes per million vehicles entering the intersection (as measured over a six year period ending on 11/30/2013). A reading above 1.0 is often a trigger level for local governments. As a result, Goodwin/Ingle got some upgrades including a left turning lane on Goodwin. The Transportation Impact Study done for the Camas Heights proposal, dated 10/26/2021, includes an analysis of the nearest intersection of NE 28th St and 232nd Ave. Crash rates for the period

[1/2015 – 12/2019](#)

show six crashes over the five year period and a rate of 0.48 crashes per million vehicles entering that intersection. However, when counting the most recent three years up to the present: 4/1/2019 – 3/31/2022 the Washington State Patrol Collision Database (<https://fortress.wa.gov/wsp/collisionanalysis/Query/SearchCriteria>) shows seven crashes during this period which computes to a rate of approximately 0.93 / million vehicles over three years. While local officials generally prefer to take running averages of five years or more for such analysis, that may not be optimal in this case in light of the rapid development along this corridor. The number of cars and people within a half-mile of this intersection have no doubt increased by a few hundred percent over the last decade, and the number of nearby schools has gone from zero to one.



**Robert Maul** (He/Him/His)  
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