



## Memo from Community Development Engineering

TO: Madeline Sutherland, Planner

FROM: Anita Ashton, Project Manager

DATE: January 17, 2023

SUBJECT: CUP22-01 Oak Tree Station – Revised Traffic Impact Analysis (TIA), Dated January 3, 2023  
Camas Staff, City of Vancouver, and Clark County Responses to Revised TIA.

Below are the Special Conditions of Approval (SCOA) from the staff report dated December 7, 2022, for CUP22-01, which were conditioned to be addressed in a revised TIA. A revised TIA (Exhibit 47) was prepared by H. Lee & Associates and submitted on January 3, 2023.

### Special Conditions of Approval (SCOA)

#### Prior to Final Engineering Plan Submittal:

43. The applicant shall be required to submit the updated TIA for review and approval by Camas staff, the City of Vancouver, and Clark County.”
44. The applicant shall be required to provide an updated trip distribution analysis, based on the current ITE manual, for review by the City of Camas, City of Vancouver, and Clark County. The updated trip distribution is to include City of Camas intersections; will provide the City of Vancouver with the number of PM peak hour trips to the proportionate share intersections; and allow for Clark County to determine if there are 5 or more PM peak hour trips impacting regionally significant intersections or corridors under Clark County jurisdiction within 2 miles of the project.
45. The applicant shall provide an updated trip distribution analysis that identifies the number of PM Peak Hour trips that are distributed to City of Vancouver’s proportionate share intersections: NE 192<sup>nd</sup> Avenue & NE 13<sup>th</sup> Street; SE 192<sup>nd</sup> Avenue & SE 34<sup>th</sup> Street; and SE 192 Avenue & SR-14 Ramps.
46. Staff recommends a condition of approval that prior to final engineering plan submittal, the applicant should be required to submit an updated TIA for staff to reassess the LOS at all study intersections.

#### **SCOA #43:**

This condition was met with the submittal of the revised TIA prepared by H. Lee & Associates (HLA) dated January 3, 2023.

#### **SCOA #44:**

##### Camas Staff Comments:

##### Food Cart Station:

The discussion on pages 2 thru 4 address a survey conducted by HLA of three food cart stations of similar size, in and around the Portland area. “The data collected was based on the PM Peak hours as none of the three food cart stations are open during the AM Peak hours.”

Table 3 ‘Trip Generation for Oak Tree Station’, on page 5 shows the Pass-by Trips calculated at 43%.

- While staff is not opposed to a pass-by rate for this use, staff is unable to determine how the applicant arrived at a pass-by rate of 43%.

**Staff finds that the applicant should address how the pass-by percentage of 43% for food carts was determined.**

**Staff finds that the Clark County Concurrency review, dated January 12, 2023, which assumed a 0% pass-by for food carts, seems to overstate the actual number of new trips for the site.**

LUC 938 Coffee/Donut Shop with Drive-Thru Window, No Indoor Seating:

The information shown in, *Table 3 'Trip Generation for Oak Tree Station'*, page 5 appears to be based on the 10<sup>th</sup> Edition ITE Manual as noted below:

- The number of AM and PM peak hour trips are shown to be based on the square footage of the Coffee/Donut Shop with Drive-Through Window, which is per the 10<sup>th</sup> Edition ITE Manual.
  - The 11<sup>th</sup> Edition ITE Manual, LUC 938, calculates trip generation based on the number of drive-thru windows.
  - The estimated number of trips PM Peak hour trips, per window = 17.15 trips
  - Based on the number of drive-thru lanes (2), the estimated total PM Peak hour trips = 34.3 PM Peak hour trips
- The percentage of pass-by trips are shown to be calculated at 90% AM - 98% for PM trips.
  - The 3<sup>rd</sup> Edition Trip Generation Handbook, LUC 938, the pass-by trips for PM Peak hour ranges from 83% to 95% with the average pass-by PM Peak hour percentage of 89%.
  - Based on the average percentage above, the non-pass-by trips in the PM peak hour = 11%
  - $34.3 \text{ PM Peak} * 0.11 = 3.77 \text{ Trips (New PM Peak Hour Trips)}$

**As trip distribution information is provided for in-process traffic for future developments, staff recommends that the revised TIA should be re-submitted with Table 3 revised per the 11<sup>th</sup> Edition ITE Manual data for LUC 938, and the corrected pass-by information per the 3<sup>rd</sup> Edition Trip Generation Handbook for LUC 938.**

**However, for the purpose of the applicant's traffic study with the assumptions for analyzing intersection levels of service (LOS), staff finds that the calculated difference in the number of PM Peak hour pass-by trips is de-minimis.**

City of Vancouver Concurrency Comments dated January 12, 2023: "The applicant has provided PM peak hour trip distribution through the City of Vancouver's proportionate share intersections." The requested information is shown in *Table 5 Pro-Rata Share Contributions*, on page 6 of the revised TIA and noted below in COA #45 discussion.

Clark County Concurrency Comments dated January 12, 2023: "County concurrency has reviewed the Revised Oak Tree Station Traffic Impact Study prepared by H. Lee & Associates, PLLC dated January 3, 2023. The Oak Tree Station development seeks to construct a 12,574 square-foot multi-tenant retail structure, a 22-unit food cart pod with an associated 5,900 square-foot covered seating area, a coffee kiosk with 2 drive-through windows and no indoor seating along with other associated appurtenances. Staff used the applicant's distribution to determine anticipated vehicle assignments approaching intersections under county jurisdiction.

Staff concluded that because this development is not expected generate more than 5 new peak hour trips on regionally significant intersections and corridors under county jurisdiction, county concurrency has no further comments and requires no further concurrency related analysis."

Clark County staff identified inconsistencies in the TIA, specifically the use of the 10<sup>th</sup> Edition ITE Manual for LUC 938, as noted in Camas staff comments; the pass-by percentage for LUC 938 from the 3<sup>rd</sup>

Generation Trip Distribution Handbook, as noted in Camas staff comments; and the percentage of pass-by trips for the food carts, as noted in Camas staff comments.

**SCOA #45:**

Table 5, shown below and on page 6, provides the required updated trip distribution analysis that identifies the number of PM Peak hour trips that are distributed to COV's proportionate share intersections.

**Table 5. Pro-Rata Share Contributions**

Intersection	P.M. Peak Hour Impact		
	Project P.M. Peak Hour Trip Impact	Cost Per P.M. Peak Hour Trip Impact	Pro-rata Share Contribution Required
NE 192 <sup>nd</sup> Avenue/NE 13 <sup>th</sup> Street	19 P.M.	\$400.00	\$7,600.00
SE 192 <sup>nd</sup> Avenue/SE 34 <sup>th</sup> Street	17 P.M.	\$150.00	\$2,550.00
SE 192 <sup>nd</sup> Avenue/SR-14 Westbound Ramps	11 P.M.	\$2,000.00	\$22,000.00

Total Proportionate Share Amount = \$32,150.00

*The City of Vancouver requests that a condition of approval be enforced for the project, requiring the developer to pay the calculated proportionate share fees to the City of Vancouver prior to final permit approval of the project.*

***Staff finds that Special Condition of Approval #74, in the Staff Report dated December 7, 2022, for CUP22-01, addresses the COV's request for a condition of approval.***

***Staff recommends that Special COA #74 should be revised to read as follows:***

**Prior to Building Permit Approval:**

***74. Prior to building permit issuance, the applicant shall be required to pay the proportionate share amount of \$32,150.00 to the City of Vancouver and to provide Camas staff with documentation of payment of said proportionate share amount.***

**SCOA #46:**

**Camas Staff Comments:** The discussion on page 5 addresses the '2027 "With Project" Traffic Volumes and Levels of Service and states that "As shown in Table 4, all of the study area intersections are projected to operate within the acceptable levels of service standards in the 2027 "With Project" condition."

- However, Table 4 on page 6 has a scrivener's error as it is titled '2027 "Without Project" Levels of Service'.
- As indicated on page 5, the title of Table 4 should read '2027 "With Project" Levels of Service'.

***If the applicant is resubmitting a revised TIA, staff finds that the scrivener's error noted above should be addressed.***

**Overall, Camas staff concurs with the findings of the H. Lee & Associates TIA dated January 3, 2023.**

**Staff concurs that TIF should be calculated at the time of building permit application. Staff will consider data provided by the applicant's traffic engineer at that time.**

**From:** [Hahn, Eric](#)  
**To:** [Anita Ashton](#)  
**Cc:** [Lopossa, Ryan](#); [Curleigh \(Jim\) Carothers](#); [David Jardin](#)  
**Subject:** RE: CUP22-01 Oak Tree Station - Revised TIA  
**Date:** Thursday, January 12, 2023 3:30:34 PM  
**Attachments:** [image001.png](#)

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Anita,

The applicant has provided PM peak hour trip distribution through the City of Vancouver's proportionate share intersections. Here is a list of the proportionate share projects identified by the applicant, along with the calculated proportionate share fees:

**Table 5. Pro-Rata Share Contributions**

Intersection	P.M. Peak Hour Impact		
	Project P.M. Peak Hour Trip Impact	Cost Per P.M. Peak Hour Trip Impact	Pro-rata Share Contribution Required
NE 192 <sup>nd</sup> Avenue/NE 13 <sup>th</sup> Street	19 P.M.	\$400.00	\$7,600.00
SE 192nd Avenue/SE 34th Street	17 P.M.	\$150.00	\$2,550.00
SE 192nd Avenue/SR-14 Westbound Ramps	11 P.M.	\$2,000.00	\$22,000.00

The City of Vancouver requests that a condition of approval be enforced for the project, requiring the developer to pay the calculated proportionate share fees to the City of Vancouver prior to final permit approval of the project.

I have no objections or further comments. Let me know if you have any questions.

**Eric Hahn, PE** | Senior Civil Engineer  
 CITY OF VANCOUVER, WASHINGTON  
*Public Works | Streets & Transportation | TDRS*  
 Marine Park Engineering – 4500 SE Columbia Way  
 P.O. Box 1995 • Vancouver, WA, 98668-1995  
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**From:** Anita Ashton <AAshton@cityofcamas.us>  
**Sent:** Wednesday, January 11, 2023 4:56 PM  
**To:** Hahn, Eric <Eric.Hahn@cityofvancouver.us>; David Jardin <David.Jardin@clark.wa.gov>

**Subject:** FW: CUP22-01 Oak Tree Station - Revised TIA

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Hey Guys,

Just wanted to double check to see if you have time to review the revised TIS and provide comments by Friday, January 13, 2023.

Thanks

**Anita Ashton**

Engineering Project Manager  
Community Development  
Desk 360-817-7231

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**From:** Anita Ashton

**Sent:** Friday, January 6, 2023 2:53 PM

**To:** 'David Jardin' <[David.Jardin@clark.wa.gov](mailto:David.Jardin@clark.wa.gov)>; Hahn, Eric <[Eric.Hahn@cityofvancouver.us](mailto:Eric.Hahn@cityofvancouver.us)>

**Cc:** Curleigh (Jim) Carothers <[jcarothers@cityofcamas.us](mailto:jcarothers@cityofcamas.us)>

**Subject:** CUP22-01 Oak Tree Station - Revised TIA

Afternoon and happy new year!!

We've received the revised TIA for the above noted project. Camas staff review and comments are to be submitted to the hearings examiner by 5:00 on January 17, 2023. If you could review and provide comments to us by Friday, January 13, 2023, that would be great.

Have a great weekend.

**Anita Ashton**

Engineering Project Manager  
Community Development  
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**From:** [David Jardin](#)  
**To:** [Anita Ashton](#); [Hahn, Eric](#)  
**Subject:** RE: CUP22-01 Oak Tree Station - Revised TIA  
**Date:** Thursday, January 12, 2023 6:32:34 PM

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Good Evening Anita:

I am very sorry for the delay. Clark County Concurrency has reviewed the additional traffic information submitted by H. Lee & Associates and have the following comments.

County concurrency has reviewed the Revised Oak Tree Station Traffic Impact Study prepared by H. Lee & Associates, PLLC dated January 3, 2023.. The Oak Tree Station development seeks to construct a 12,574 square-foot multi-tenant retail structure, a 22 unit food cart pod with an associated 5,900 square-foot covered seating area, a coffee kiosk with 2 drive-through windows and no indoor seating along with other associated appurtenances. Staff used the applicant's distribution to determine anticipated vehicle assignments approaching intersections under county jurisdiction. Staff concluded that because this development is not expected generate more than 5 new peak hour trips on regionally significant intersections and corridors under county jurisdiction, county concurrency has no further comments and requires no further concurrency related analysis. The proposed development site is located on parcel numbered 176162000 in Camas.

Staff's review of the revised traffic study identified inconsistencies between:

- The proposed plan (Figure 2 Site Plan) and what was reported in the trip generation table provided (Table 3) for the Coffee/Donut Shop with Drive-Thru Window and No Indoor Seating
  - The applicant indicated that they were using the Institute of Transportation Engineers (ITE) Trip Generation Manual 11<sup>th</sup> Edition to determine trip generation for the proposed coffee/donut shop with drive-thru window and no indoor seating, ITE LUC 938. The applicant's engineer reported the trip generation based on 1,000 square feet; the 11<sup>th</sup> Edition ITE no longer uses square feet as an independent variable. The independent variable used in the 11<sup>th</sup> Edition is Number of Drive-Thru Lanes.
    - Staff used Figure 2, from the traffic study, and estimated the trip generation based on 2 Drive-Thru Lanes. The estimated trip generation is as follows:
      - ADT: 358 (179 Enter: 179 Exit)
      - AM Peak Hour: 80 (40 Enter: 40 Exit)
      - PM Peak Hour: 30 (15 Enter: 15 Exit)
    - The applicant's engineer also used a pass by rate that is not in the ITE Trip Generation Handbook, nor was there accepted locally collected data to support the applicant's use of pass by of 90% in the AM and 98% in the PM. The pass by typically used for ITE LUC 938 is 83%. This would result in an estimated trip generation of:

- ADT: 61
- AM Peak Hour: 14
- PM Peak Hour: 5

It should be noted that the use of square footage in the table may have been a typo, as the trip generation rates shown in the table are the rates used, per lane, in the ITE manual.

- The applicant's traffic engineer submitted locally collected trip generation data for the proposed 22-food cart pod. The engineer provided information to determine the trip generation rates for ADT and PM Peak Hour Trips. County staff's initial review of the collected data appears to have been collected and processed in compliance with the ITE Trip Generation Handbook, 3<sup>rd</sup> Edition. The trip generation rates proposed appear to be a reasonable representation of a food cart pod of over 20 food carts. However, the ADT rate proposed based on the data collected, 24.77 in Table 1, was not the trip generation rate shown in Table 3. The ADT calculation appears to have used the 25.1 ADT/Food Cart Kitchen instead of the 24.77 ADT/Food Cart Kitchen rate.
- The applicant's engineer also used a pass by rate that is not in the ITE Trip Generation Handbook, nor was there accepted locally collected data to support the applicant's use of pass by of 43%. Because there is no data to support the application of pass by reductions, pass by should not be accepted in determining the net new trips generated by the food cart pod. Removing the pass by reductions calculated and applying the ADT rate, 24.77 ADT/Food Cart Kitchen, as reported in the collected data would result in an estimated trip generation of:
  - ADT: 545
  - AM Peak Hour: -
  - PM Peak Hour: 73

County staff's evaluation of the trip generation table found in the applicant's traffic study, Table 3, found that the number of trips generated by this proposed development may have been under-represented based on the locally collected data, the ITE Trip Generation Manual 11<sup>th</sup> Edition and the available opportunities for pass by reduction as found in the ITE Trip Generation Handbook 3<sup>rd</sup> Edition. The trip generation table should be updated to better reflect the uses proposed along with the pass by reductions available to the specific land uses.

The expected trips associated with the proposed site based on staff's evaluation is as follows:

Net New Trips – Site Total:

ADT: **1,291**

AM Peak Hour: **44**

PM Peak Hour: **161**

**David Jardin**

Concurrency Engineer

COMMUNITY DEVELOPMENT - DEVELOPMENT ENGINEERING

Desk: 564.397.4354

Cell: 360.818.3307

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