

**From:** Anita Ashton  
**To:** [paulwilliamspe@gmail.com](mailto:paulwilliamspe@gmail.com); [Larry Bonife](#)  
**Cc:** [jamie.howsley@jordanramis.com](mailto:jamie.howsley@jordanramis.com); [Robert Maul](#); [Curleigh \(Jim\) Carothers](#); [Madeline Sutherland](#)  
**Subject:** RE: CUP22-01 Oak Tree Station - Revised TIA Comments -DRAFT  
**Date:** Tuesday, November 22, 2022 5:10:00 PM  
**Attachments:** [image006.png](#)

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All,

The Monday, November 21, 2022 email, which included “items to be addressed” were review comments from the City Engineer, James Carothers, P.E.

As stated below, staff is not in support of the use of LUC 932 for High Turnover Sit Down Restaurant for calculating trips for the food carts. Per the ITE Manual LUC 932 applies as follows:

*Land Use: 932*

*High-Turnover (Sit-Down) Restaurant*

*Description*

*This land use consists of sit-down, full-service eating establishments with a typical duration of stay of 60 minutes or less. This type of restaurant is usually moderately priced, frequently belongs to a restaurant chain, and is commonly referred to as casual dining. General, these restaurants serve lunch and dinner; they may also be open for breakfast and are sometimes open 24 hours a day. These restaurants typically do not accept reservations. A patron commonly waits to be seated, is served by wait staff, orders from a menu, and pays after the meal.*

Staff finds that the proposed food carts do not fit this land use designation (LUC 932).

While staff finds that the LUC 926 Food Carts designation is adequate for the food carts, staff would be willing to consider working with the applicant’s consultant to come up with a congruent scenario from the ITE Trip Generation Manual, 11<sup>th</sup> Edition. Specifically, using LUC 933 *Fast-food Restaurant without Drive-through Window* may be an amenable solution provided that the comparison used is the number of employees. Additionally, Staff finds that the use of seats and/or square footage is not an adequate fit.

As stated in the email below, the following items are to be addressed:

4. Please provide justification for any internalization (internal capture) or pass-by reductions.  
The 3<sup>rd</sup> Edition Trip Generation Handbook does not provide pass-by information Table for LUC 926.
5. The City of Vancouver requires a trip distribution of the number of PM peak hour trips generated by this use through the following intersections on 192<sup>nd</sup> Avenue;
  - a. NE 192<sup>nd</sup> Ave. & NE 13<sup>th</sup> Street
  - b. NE 192<sup>nd</sup> Ave. & SE 34<sup>th</sup> Street
  - c. NE 192<sup>nd</sup> Ave. & SR-14 ramps
  - d. The project will be required to pay proportionate share fees for the number of PM peak hour trips to the above intersections.
6. Empirical data is mentioned in the TIA. Please provide documentation of this data.



**James E Carothers, PE**  
 Engineering Manager/City Engineer  
 Desk 360-817-7230  
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**From:** Robert Maul <[RMaul@cityofcamas.us](mailto:RMaul@cityofcamas.us)>  
**Sent:** Monday, November 21, 2022 4:50 PM  
**To:** Anita Ashton <[AAshton@cityofcamas.us](mailto:AAshton@cityofcamas.us)>; Curleigh (Jim) Carothers <[jcarothers@cityofcamas.us](mailto:jcarothers@cityofcamas.us)>  
**Cc:** Madeline Sutherland <[MSutherland@cityofcamas.us](mailto:MSutherland@cityofcamas.us)>  
**Subject:** FW: CUP22-01 Oak Tree Station - Revised TIA Comments

To keep you in the loop.

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**From:** Paul Williams [<mailto:paulwilliamspe@gmail.com>]  
**Sent:** Monday, November 21, 2022 4:42 PM  
**To:** Larry Bonife <[larry@oaktrestation.com](mailto:larry@oaktrestation.com)>; Jamie Howsley <[jamie.howsley@jordanramis.com](mailto:jamie.howsley@jordanramis.com)>  
**Cc:** Robert Maul <[RMaul@cityofcamas.us](mailto:RMaul@cityofcamas.us)>  
**Subject:** RE: CUP22-01 Oak Tree Station - Revised TIA Comments

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Hi Jamie, Larry:

Anita is requesting that the project use ITE 926 (Food Cart Pods). ITE 926 is not appropriate land use for this site because ITE only studies 4 sites during the summer months. Food carts parked on gravel surfaces with limited cover seating areas are not equivalent to what this project proposes. This project is proposing that all the food carts have a permanent connection to water and sewer which is not typical for the four 4 sites that were surveyed for ITE 926. Also, the project proposes to have a covered walkway for each cart that connects to a larger building. Below is the definition for ITE 926 Food Cart Pods.

## ITE 926

### Description

A food cart pod is a group of food carts or food trucks congregated in an established location, such as a parking lot, on a semi-permanent or regular basis. A food cart pod typically operates during both the lunch and dinner timeframes. A food cart pod often includes limited covered seating or a dining area. A food cart pod may also include the sale of alcoholic beverages.

#### Additional Data

All data were collected in the summer months. Most sites were located along public transit routes and some were accessible by bike or multi-use paths. The independent variable “food cart” is defined for the purpose of this land use as the number of food carts open at the time of the study.

Thanks Paul

Engineering Northwest PLLC  
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6168 NE HWY 99 STE 100  
Vancouver WA 98665  
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**From:** [Anita Ashton](#)

**Sent:** Monday, November 21, 2022 3:35 PM

**To:** [paulwilliamspe@gmail.com](mailto:paulwilliamspe@gmail.com); [Larry Bonife](#)

**Cc:** [Curleigh \(Jim\) Carothers](#); [Robert Maul](#); [Madeline Sutherland](#)

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

Paul,

In reference to the Traffic Impact Analysis (TIA) dated November 1, 2022, please note that the following items need to be addressed:

1. Camas engineering staff is not in support of the use of ITE LUC 932 High Turnover Sit Down Restaurant for the 22 food carts that are being proposed.
2. The appropriate section for the food carts/pods is LUC 926. PM peak hour trips in LUC 926 Food carts are substantially higher than High Turnover Sit Down Restaurant.
3. Please use LUC 926, PM Peak Hour of Adjacent Street Traffic. The food cart/pod LUC includes limited covered seating or dining, and may include the sale of alcoholic beverages.
4. Please provide justification for any internalization (internal capture) or pass-by reductions. The 3<sup>rd</sup> Edition Trip Generation Handbook does not provide pass-by information Table for LUC 926.
5. The City of Vancouver requires a trip distribution of the number of PM peak hour trips generated by this use through the following intersections on 192<sup>nd</sup> Avenue;
  - a. NE 192<sup>nd</sup> Ave. & NE 13<sup>th</sup> Street
  - b. NE 192<sup>nd</sup> Ave. & SE 34<sup>th</sup> Street
  - c. NE 192<sup>nd</sup> Ave. & SR-14 ramps
  - d. The project will be required to pay proportionate share fees for the number of PM peak hour trips to the above intersections.
6. Empirical data is mentioned in the TIA. Please provide documentation of this data.

If you wish to talk through this with staff next Tuesday (11/29) or Wednesday (11/30), let us know.  
Thanks

**James E Carothers, PE**

Engineering Manager/City Engineer  
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**Anita Ashton**

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