



REQUEST FOR DIRECTOR'S REVIEW OF IMPACT FEE

OFFICIAL USE ONLY

File #: _____ Received By: _____ Date Received: _____

Note: A request for review must be filed within fourteen calendar days of payment of the impact fee at issue.

Review requested by: ☒ Owner ☒ Applicant ☐ Other Fee Payer _____

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Project Name: Secure It Self Storage – Cooper Point

Project Address: 2225 Cooper Point Rd., SW, Olympia, WA

Project Description: Mini Storage Warehouse, 126,000 sq ft, 844 units

Type of Impact Fee to be Reviewed:

Amount Paid (or Due)

Date Paid (or Due)

☐ Park

☐ School

☒ Transportation

\$166,320.00*

February 5, 2018

Reasons for Request for Review (please attach any additional information that you feel is important):

See Attached.

* See Footnote 1 on attachment.

Lancze G. Douglass

Print Name


Fee Payer's Signature



ATTACHMENT TO REQUEST FOR DIRECTOR'S REVIEW OF IMPACT FEE

REASONS FOR REQUEST FOR REVIEW:

The transportation impact fee worksheet for the Project shows that the impact fee of \$167,580¹ is based on 126,000 square feet times \$1.33 per square foot. According to Olympia's Transportation Impact Fee Update, November 2016 ("Update") at pages 7-8, impact fees are based on additional PM peak hour trips. Pages 7-8 of the Update describe how the cost per each new PM peak hour trip (\$2,999) is derived. According to page 16 of the Update, the number of PM peak hour trips for each type of use is based on the trip generation data in the 2012 (9th Ed.) of the ITE Transportation Manual. Per pages 12 and 13 of the Update, the trip generation for a Mini-Warehouse is based on Land Use Code 151 in the ITE Manual. According to the Update at page 10, Table 3, Column 4, each storage unit generates .26 "PM Peak Trips/Ends" per unit. On page 13 this trip generation rate per unit is translated into \$1.33 per square foot, without explanation.

There are a number of problems with the fee being charged that require review and explanation. First, the entire transportation impact fee program is based on the impact of PM peak hour trips on the transportation infrastructure. See Update, pages 7-8 (calculation of cost of additional PM peak hour trips), and Table 3, page 12, column 4 ("PM Peak Trips/Ends/Unit"). This is also reflected in the City Code. See OMC 15.040.040(C), 15.040.070(L) & 15.080.050(C). But the fee for Mini Warehouses is not tied to PM peak hour trips. The .26 figure in Table 3 is almost the exact same number (.25) as the ITE Manual number for Average Daily Trips ("ADTs"). See attached ITE Manual pages. The PM peak figure is .02. This means that per the ITE Manual a Mini-Warehouse generates 2 trips per 100 units in the PM peak hours, not 26, as stated in Table 3 of the Update. The ADT figure of .25 is 12.5 *times greater than* the PM peak figure. This makes perfect sense given what is being measured. Using the ADT factor from the ITE Manual is not only inconsistent with the stated methodology in the Update, but it also results in a gross overstatement of the trip generation impact and resulting fee. If the actual ITE PM peak factor were used and applied to the actual the number of units in the Project, the fee would be .02 (ITE PM peak factor) x 844(number of actual units) x \$2,999(cost of new PM peak trips), or \$50,623.12, which is less than 1/3 of the fee based on the square footage times the (unexplained) per square foot number.

The problem may be that the City staff (or consultant) simply used the wrong trip generation factor, .26 rather than .02. But it is impossible to determine if that is the error because of the unexplained use of square footage in Table 4 rather than the number of storage units per the ITE Manual. Indeed, use of square footage instead of the number of units makes no sense. Trip generation is obviously a function of the number of units, not their aggregate square footage. It is unlikely that the City has any studies supporting trip generation based on square footage for

¹ The worksheet shows \$167,580, but the proposed Deferral Agreement prepared by the City shows \$166,320, which is the amount sent on 2/5/18.

Mini Warehouses. Yet this leap to square footage and abandonment of the ITE methodology is not explained anywhere in the Update.

As noted above, it appears from the reference to .26 that the City may be using ADTs as the basis for calculating the fee for Mini Warehouses. But there is nothing in the Update that explains how ADTs can be used to calculate the number of new trips, which must be done to calculate the "Project Cost per New Trip End." The phrase "Average Daily Trip" or the acronym ADT is not even mentioned in the Update. Moreover, as noted above, it is completely inconsistent with the methodology of the Update, which is based on PM peak hour trips.

Similarly, there is no analysis, similar to pages 7-8, that explains how the "Project Cost per New Trip End" is converted to a per square foot cost (page 13, Table 4). A footnote on page 12 simply states, without further explanation, that "For uses with unit of measure in "SF GFA" or "SF GLA" the impact fee is dollars per square foot." If there were such an analysis, the denominator in the equation on page 8 of the Update would have been at least 10 times larger, resulting in a much smaller "Project Cost per Trip End." But no such analysis exists.

In summary, the trip generation factor used by the City for Mini-Warehouses is incorrect. It is 12.5 times greater than it should be per the ITE Manual. The use of a per square foot cost instead of per unit cost is erroneous and inconsistent with the ITE Manual, which is the stated basis for the Update and the fees. Finally, without a supportable explanation of how the per square foot amount is arrived at, there appears to be no rational basis for the fee charged the Project. The City should review all of its impact fees that are based on square footage, as the same problem may exist for other uses. In accordance with the ITE Manual and the "Project Cost per New Trip End" as calculated in the Update, the transportation impact fee for this Project should be \$50,623.12.

Mini-Warehouse (151)

PM

Average Vehicle Trip Ends vs: **Storage Units**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.

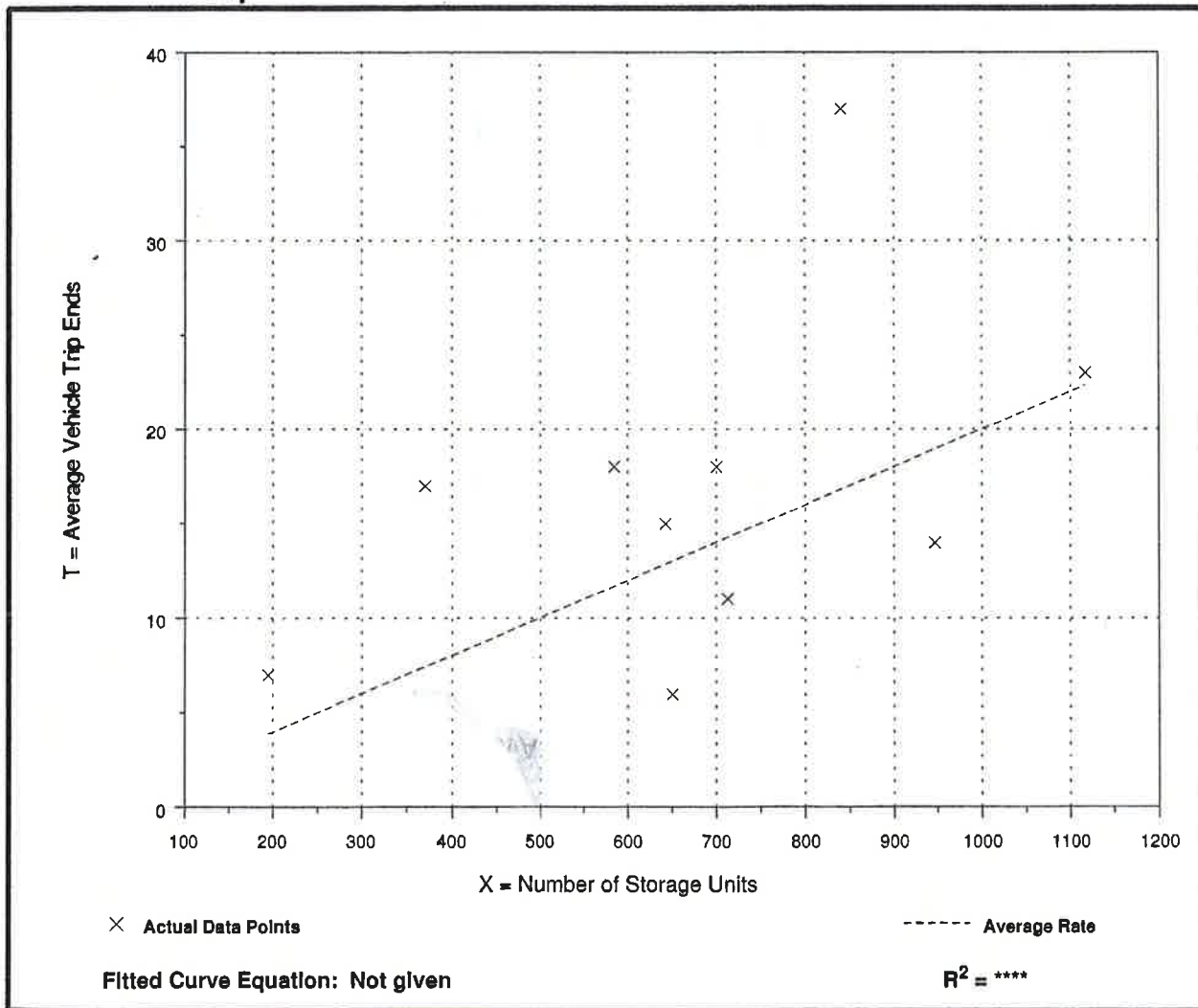
Number of Studies: 10
Average Number of Storage Units: 676
Directional Distribution: 48% entering, 52% exiting

Trip Generation per Storage Unit

Average Rate	Range of Rates	Standard Deviation
0.02	0.01 - 0.05	0.16

Page 10 table 3 calls out a rate of 0.26 PM Trips Per Unit

Data Plot and Equation



Mini-Warehouse (151)

AM

Average Vehicle Trip Ends vs: Storage Units

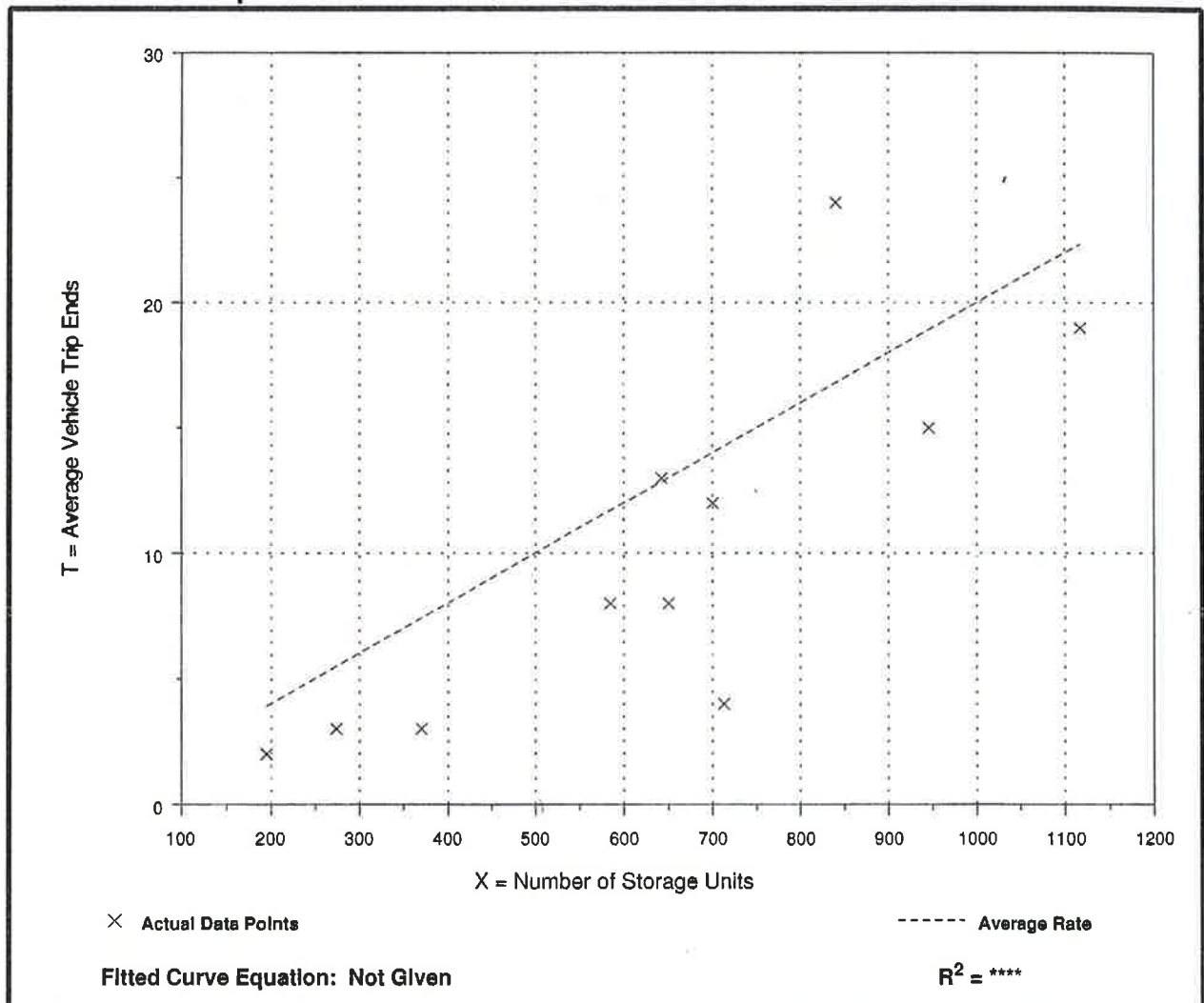
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.

Number of Studies: 11
Average Number of Storage Units: 639
Directional Distribution: 50% entering, 50% exiting

Trip Generation per Storage Unit

Average Rate	Range of Rates	Standard Deviation
0.02	0.01 - 0.03	0.13

Data Plot and Equation



Mini-Warehouse (151)

ADT

Average Vehicle Trip Ends vs: **Storage Units**
On a: **Weekday**

Number of Studies: 8
Average Number of Storage Units: 717
Directional Distribution: 50% entering, 50% exiting

Trip Generation per Storage Unit

Average Rate	Range of Rates	Standard Deviation
0.25	0.15 - 0.46	0.51

Data Plot and Equation

