

May 14, 2018

Aramburu & Eustis, LLP
J. Richard Aramburu
720 Third Avenue, Suite 2000
Seattle, WA 98104

RE: Defining commercial access for driveway access management purposes

Dear Mr. Aramburu,

You have asked for my professional opinion on whether the definition of commercial access as it is utilized in WSDOT access management terminology includes not-for-profit uses such as places of religious assembly.

Driveway access classifications are primarily based on expected intensity of use. Typically commercial activities have the highest intensity as well as frequency of use. Thus in highway access management, commercial access (sometimes referred to as "commercial approach" or "commercial driveway") includes not only access for uses commercial in nature (i.e. for profit businesses) but other non-residential uses such as schools, churches, hospitals, etc. with high peak usage patterns.

This common usage terminology is codified and expanded upon in many jurisdictions across the United States but one relevant source for this discussion would be the National Cooperative Highway Research Program Guide for the Geometric Design of Driveways (NCHRP 659). This document discusses commercial and public uses in the same context:

Higher intensity driveways: Medium-size office or retail, such as community shopping center, with frequent driveway use during hours of operation. Also includes land uses with extreme peaking patterns, such as public schools, worship assemblies, and employee parking lots

"User Mix Considerations", Ex. 3-2, p.9, <http://www.trb.org/Publications/Blurbs/163868.aspx>

Therefore, in my professional opinion, the designation of commercial access for access management and traffic design purposes in Washington State would include religious places of assembly.

Should you have any questions, please contact me directly at 425-652-1030.

Sincerely,

William Popp, P.E.

