

Transportation Impact Fee Rate Study Update

**Prepared for:
City of Des Moines**

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SE15-0402



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CHAPTER 1: INTRODUCTION

The City of Des Moines is updating its transportation impact fee program. The City's impact fee program was last updated in 2009. Over the past six years, the City has used its transportation impact fee program to fund a variety of projects. In 2015, the City updated its Comprehensive Transportation Plan, which included a new 20 year project list.

To reflect the new Transportation Element project list, as well as updated assumptions around future growth and project costs, the City is updating its transportation impact fee program. This Transportation Impact Fee Rate Study documents the updated program, including the revised transportation impact fee rate schedule.

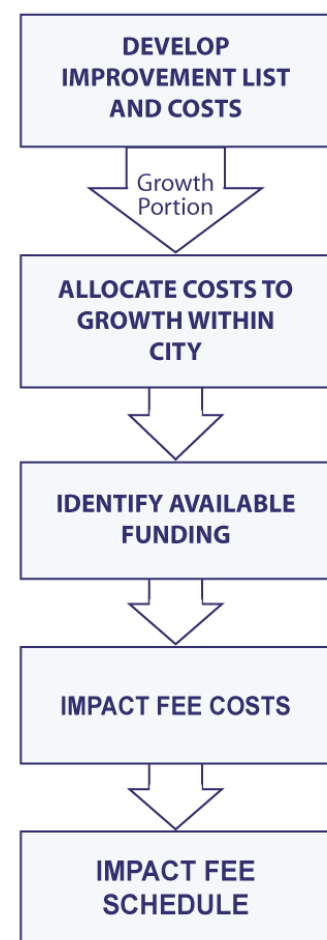
IMPACT FEE STRUCTURE

The key steps involved in the impact fee process are shown in **Figure 1**. Steps include developing a list of roadway system improvements and costs, allocating growth-related costs within the City, and identifying available funding. The remaining costs can be charged as impact fees, which are displayed in the form of a fee schedule. Each step is described in more detail in subsequent sections of this report.

DATA ROUNDING

The data in this study were prepared using computer spreadsheet software. In some tables in this study, there will be very small variations from the results that would be obtained using a calculator to compute the same data. The reason for these insignificant differences is that the spreadsheet software calculated the results to more places after the decimal than is reported in the tables in the report.

Figure 1. Steps to Develop a Traffic Impact Fee Program



CHAPTER 2: IMPACT FEE PROJECT LIST

Washington State law (RCW 82.02.050) specifies that Transportation Impact Fees are to be spent on “system improvements.” System improvements can include physical or operational changes to existing roadways, as well as new roadway connections that are built in one location to benefit projected needs at another location. These are generally projects that add capacity such as new streets, additional lanes, widening, and signalization.

During the City's 2015 Transportation Element Update, the City identified projects needed by 2035 to meet the adopted Level of Service (LOS) standards. In addition, the city has recently completed projects that add capacity to the transportation system as part of the Transportation Improvement Program (TIP). These capital projects form the basis for the City's impact fee project list. The resulting project list, shown in **Table 1**, includes 23 projects and \$83 million total in costs. These projects are also shown in **Figure 2**. The GMA allows for Impact Fee Programs to include recently completed projects so long as they still provide capacity to accommodate future growth.

TABLE 1. LIST OF TRANSPORTATION CAPACITY PROJECTS

Project#	Project Group	Project	Location	Description	Total Cost (\$2015)
1	C	South 216th Street	11th Avenue South to 18th Avenue South	Widen to three lanes. Add bicycle lane, sidewalks and landscaping. Add signals and intersection improvements as warranted by development.	\$6,000,000
2	C	24th Avenue South	South 216th Street to Kent-Des Moines Road	Widen to three lanes with bicycle lanes, sidewalks and landscaping.	\$6,530,000
3	A	16th Avenue South	Kent-Des Moines Road to South 260th Street	Widen to three lanes with bicycle lanes, sidewalks and landscaping.	\$18,360,000



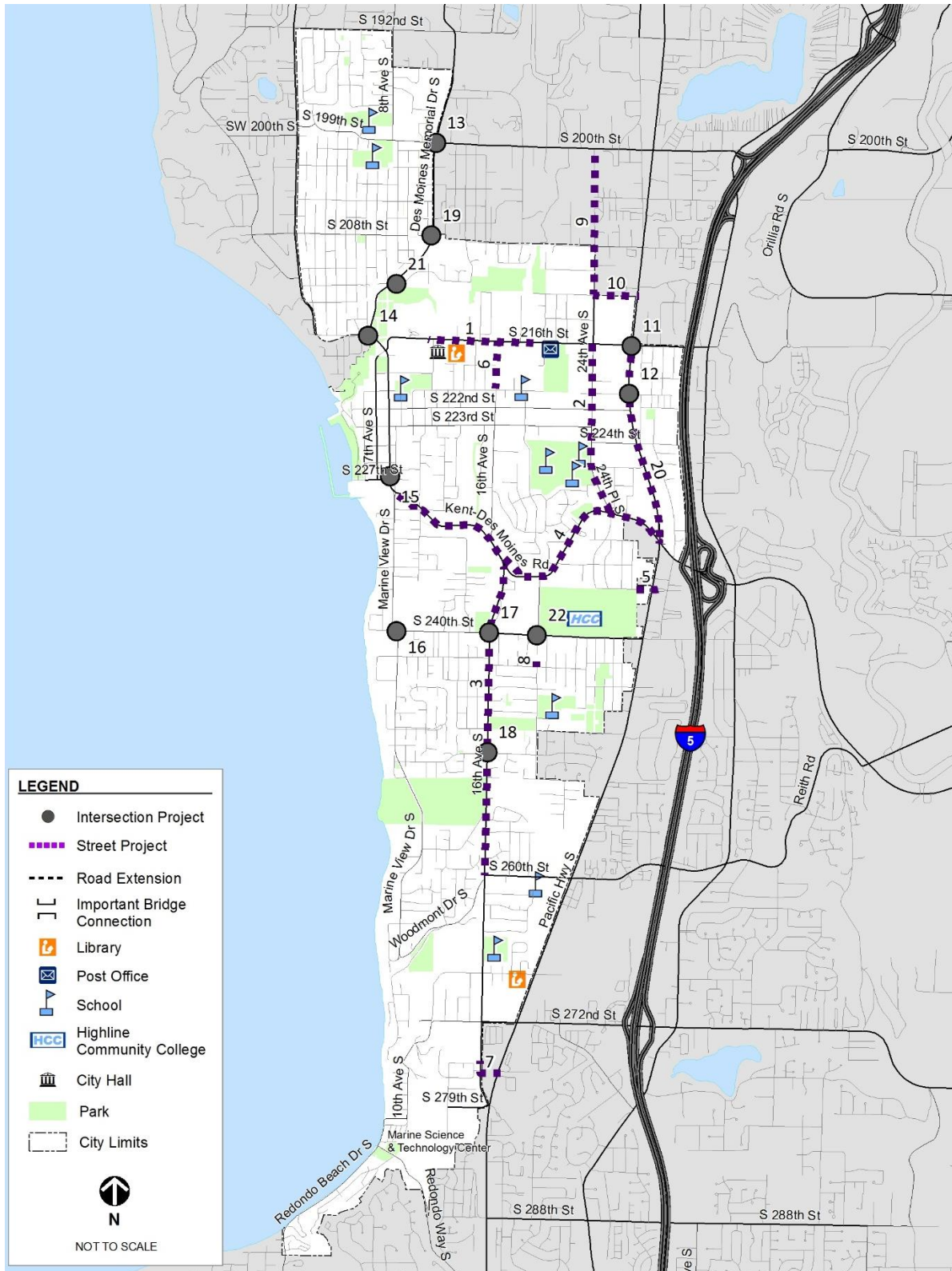
Project#	Project Group	Project	Location	Description	Total Cost (\$2015)
4	B	Kent-Des Moines Road	Marine View Drive to Pacific Highway South (SR 99)	Widen to three lanes west of 24th Avenue South and to five lanes east to Pacific Highway South with bicycle lanes, sidewalks and landscaping.	\$28,270,000
5	A	South 236th Lane	Highline College to Pacific Highway South	Widen to three lanes with bicycle lanes, sidewalks, and landscaping	\$700,000
6	A	16th Avenue South	South 216th Street to South 220th Street	Two-lane roadway connection – collector arterial.	\$3,720,000
7	A	16th Avenue South	South 272nd Street to Pacific Highway South (SR 99)	Widen to three lanes with bicycle lanes, sidewalks, landscaping, includes roadway connection/re-alignment – principal arterial.	\$6,870,000
8	A	20th Avenue South	South 242nd Street to South 244th Street	Two-lane roadway connection – neighborhood collector.	\$1,690,000
9	C	24th/28th Avenue South (SeaTac)	South 200th Street (SeaTac) to South 208th Street	Create a 4-lane to 5-lane connection to SeaTac.	\$100,000

Project#	Project Group	Project	Location	Description	Total Cost (\$2015)
10	C	South 212th Street	24th Avenue South to Pacific Highway South	Create a 3-lane connection to SR-99 to serve adjacent industrial and commercial properties.	\$2,000,000
11	C	South 216th Street	Pacific Highway South	Add eastbound and westbound through lanes. Retain eastbound right turn lane. Change eastbound and westbound left turn signal phasing to protected.	Included in South 216th Street (1a) Project
12	C	South 220th Street	Pacific Highway South	Widen for left turn pockets, adjust roadway profile and approach grades, and revise signal phasing to remove split phases.	\$790,000
13	D	Des Moines Memorial Drive	at South 200th Street	Add left turn pockets for all approaches, modify signal.	\$350,000
14	D	Des Moines Memorial Drive	at Marine View Drive and South 216th Street	Lengthen approach lanes, coordinate signal with Marine View Drive at 7th Avenue South.	\$2,820,000
15	B	Marine View Drive	at South 227th Street	Revise lane configuration to single eastbound right with overlap phase. Add second southbound through lane.	\$790,000
16	A	Marine View Drive	at South 240th Street	Revise lane configuration, add westbound right turn pocket. Add signal or roundabout if warranted.	\$1,500,000
17	A	16th Avenue South	at South 240th Street	Complete left turn pockets for all approaches.	Included in 16th Avenue South Project



Project#	Project Group	Project	Location	Description	Total Cost (\$2015)
18	A	16th Avenue South	at South 250th Street	Add eastbound right turn pocket.	\$100,000
19	D	Des Moines Memorial Drive South	at South 208th Street	Add left turn pockets.	Included in Des Moines Memorial Drive Bike Lane Project.
20	C	Pacific Highway South	Des Moines City Limits	Widened to add HOV, intersection improvements, and installed signals. Completed in 2005.	\$ 210,000
21	D	Des Moines Memorial Drive South	at South 212th Street	Add left turn pockets.	Included in Des Moines Memorial Drive Bike Lane Project.
22	A	South 240th Street	at 20th Avenue South	Widen to provide two-way left-turn lane/ refuge pocket along segment. Widen to provide left turn lane at intersection. Install traffic signal if warranted.	\$1,910,000
23	C	Marine View Drive South	Des Moines Memorial Drive to Kent-Des Moines Road	Fiber optic signal interconnect.	\$340,000
TOTAL					\$83,050,000

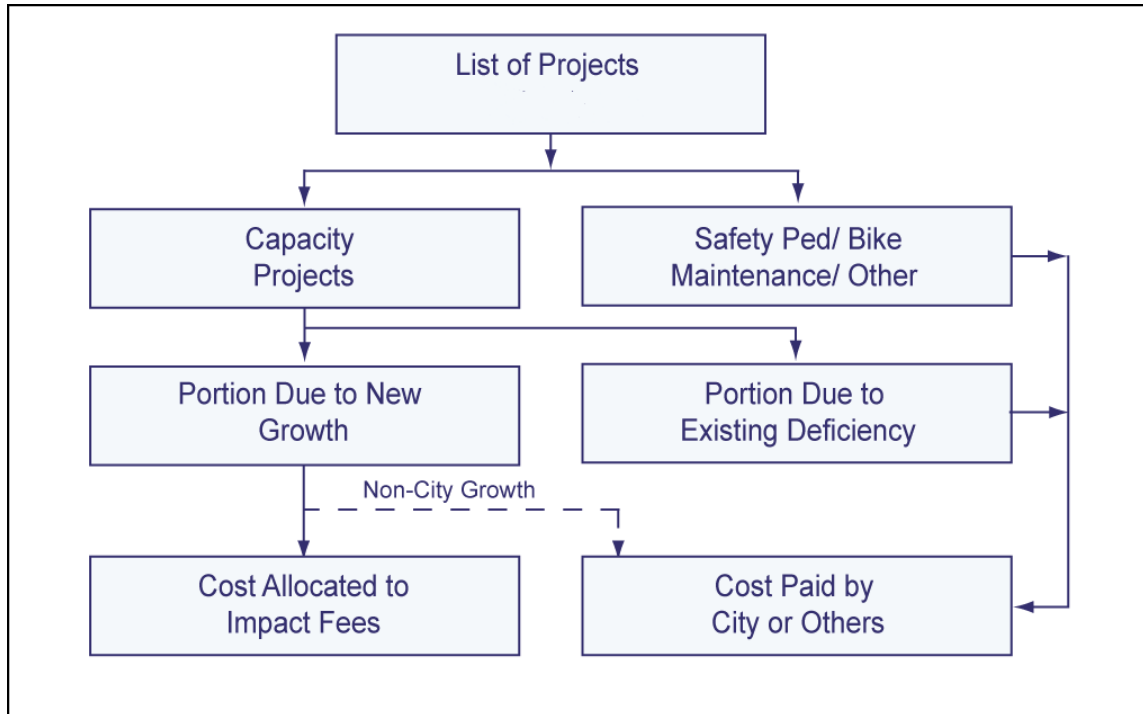
FIGURE 2. TRANSPORTATION IMPACT FEE PROJECTS



CHAPTER 3: COST ALLOCATION

The City used an impact fee methodology that distinguishes between facility improvements that address existing deficiencies and those needed to serve new growth. **Figure 3** diagrams the process.

FIGURE 3. IMPACT FEE COST ALLOCATION CONCEPT



TRANSPORTATION DEFICIENCIES

RCW 82.02.050(4) (a) requires that the capital facilities element of a jurisdiction's comprehensive plan identify "deficiencies in public facilities serving existing development." Future development cannot be held responsible for the portion of added roadway capacity needed to serve existing development.

The City's 2015 Transportation Element established a LOS standard that is based on average vehicular delay experienced at intersections throughout the city. Intersections are considered deficient if average delay exceeds LOS D, with the exception of intersections along major arterials and in Downtown Des Moines¹. As shown in **Appendix A**, none of the intersections currently exceed their standard, thus there are no existing deficiencies.

¹ Des Moines Comprehensive Transportation Plan (page 4-15).

TRAVEL GROWTH

The City's travel demand model was used in this study to prepare traffic forecasts. The model generated "PM peak hour" vehicle trips based on housing and employment data. Then the model distributed the trips between different zones within the region. Finally, the model assigned the trips to the roadway network to predict traffic volumes.

A 20-year land use growth estimate was used in the forecasts. **Table 2** shows Des Moines land uses in terms of housing units (single family and multi-family) and employment (retail, office, and industrial) growth anticipated between 2015 and 2035.

Using these land use forecasts, it is estimated that 6,038 new PM peak hour vehicle trip ends would be generated within the City during the 20-year period. This growth in vehicle trip ends was used to calculate the impact fee rates.

TABLE 2. DES MOINES POPULATION AND EMPLOYMENT GROWTH

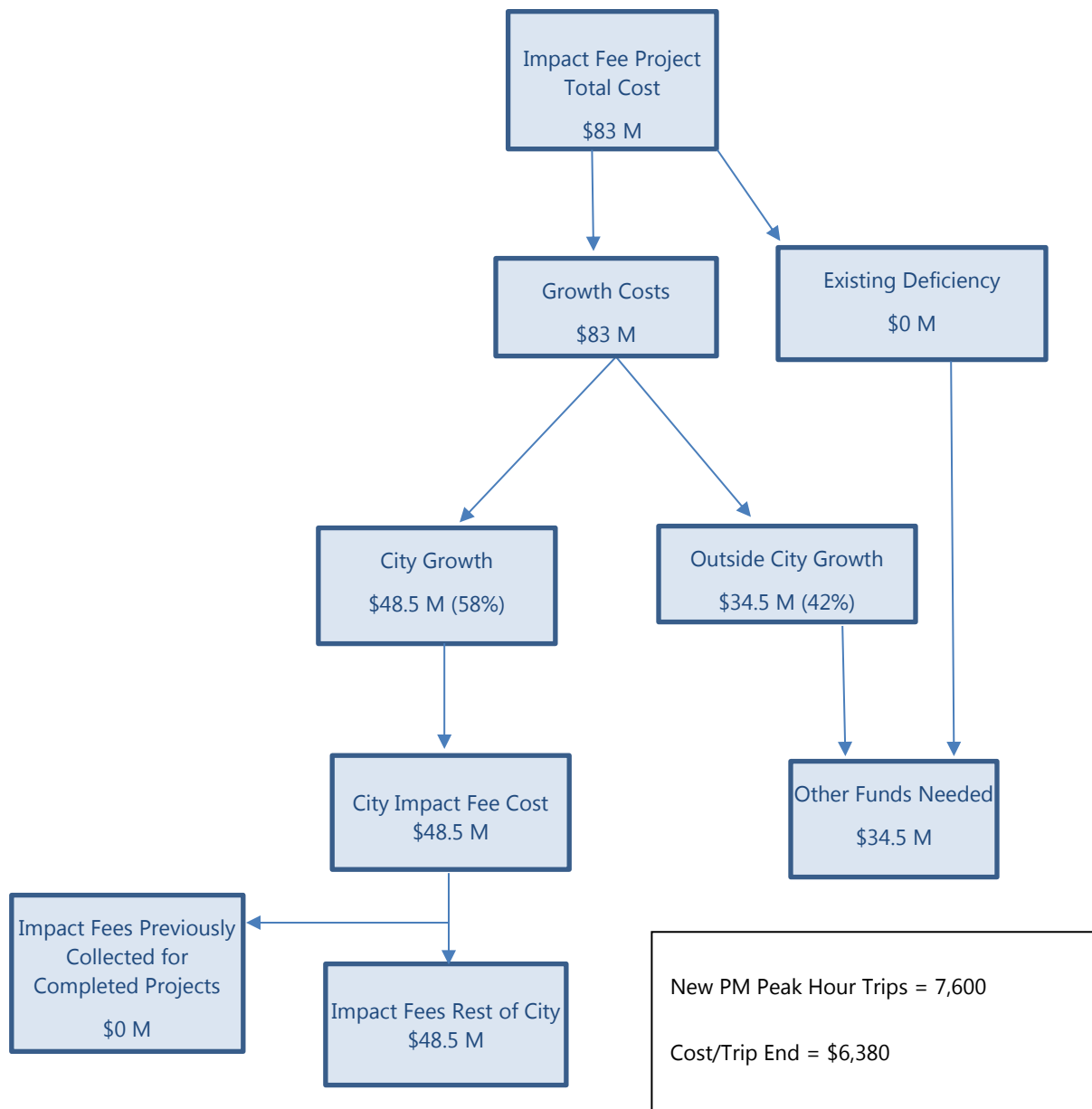
	Growth 2015-2035	% Growth
Households	3,866	31%
Employment	5,071	81%

COST ALLOCATION RESULTS

The cost allocation process distributed the growth costs for each project based upon the travel patterns between the different geographic areas within and outside the City limits. A "select link" assignment procedure provided the origin and destination information for each vehicle trip traveling through the intersection or route. Trips that pass through Des Moines, but do not have any origins or destinations internal to Des Moines (e.g. through trips) cannot be included in the calculation of impact fees.

Figure 4 summarizes the cost allocation results. For discussion purposes, the dollar amounts shown in this figure and the following text descriptions are approximate values expressed in million dollars. The actual amounts used in the calculations are accurate to a single dollar.

Figure 4 **Impact Fee Cost Allocation Results**





The total cost of the capacity projects on the capacity project list is \$83 million, as previously shown in **Table 1**. This was divided into growth costs and existing deficiencies; however, there are no deficiencies and that cost is \$0. The growth costs were further divided into 'city growth' and 'outside city growth' components using the City's traffic model data. The details of this calculation are shown in **Appendix B**.

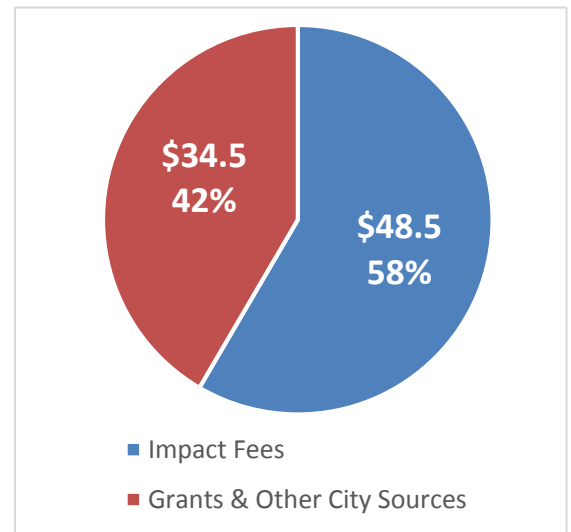
Using these data, the average percent of City growth responsibility is 58 percent. The City growth percentage, applied to the \$83 million project list, yielded an amount equal to \$48.5 million to be funded using impact fees. The remaining \$34.5 million would be expected to be obtained from city funds and/or grants.

Any fees collected from city developers to pay for reciprocal impacts to County roads would be assessed in addition to the proposed City Transportation Impact Fees.

As shown in **Figure 5**, the impact fees would constitute 58 percent of the total \$83 million cost of the improvement projects. City matching funds, new grants, and other sources would contribute the remaining 42 percent of the total project costs.

The final step in the cost allocation process dealt with calculating the "cost per new trip end" within Des Moines, derived by dividing the total eligible project cost by the total number of new PM peak hour trip ends based in Des Moines. A total of 7,600 new PM peak hour vehicle trip ends are estimated to occur within the City between 2015 and 2035.

FIGURE 5. IMPACT FEE PROGRAM FUNDING SOURCES



The analysis produced the following results.

Impact fee costs	\$48,480,000
New PM peak hour trip ends	÷ 7,600
Cost per new trip end	<hr/> = \$6,380 ²

² Actual value= \$6,376 per trip end without rounding



CHAPTER 4 - IMPACT FEE SCHEDULE

The impact fee schedule was developed by adjusting the "cost per trip end" information to reflect differences in trip-making characteristics for a variety of land use types within the study area. The fee schedule is a table where fees are represented as dollars per unit for each land use category. **Table 3** shows the various components of the fee schedule (trip generation rates and new trip percentages).

TRIP GENERATION COMPONENTS

Trip generation rates for each land use type are derived from the Institute of Transportation Engineers (ITE) *Trip Generation* (9th Edition). The rates are expressed as vehicle trips entering and leaving a property during the PM peak hour.

PASS-BY TRIP ADJUSTMENT

The trip generation rates represent total traffic entering and leaving a property at the driveway points. For certain land uses (e.g., general retail), a substantial amount of this traffic is already passing by the property and merely turns into and out of the driveway. These pass-by trips do not significantly impact the surrounding street system and therefore are subtracted out prior to calculating the impact fee. The resulting trips are considered "new" to the street system and are therefore subject to the impact fee calculation. The "new" trip percentages are derived partially from ITE data and from available surveys conducted around the country.³

SCHEDULE OF RATES

The impact fee schedule of rates is shown in **Table 3**, as well as the various components of the fee schedule. In the fee schedule, fees are shown as dollars per unit of development for various land use categories, as defined in **Appendix C**. The impact fee program is flexible in that if a use does not fit into one of the categories, an impact fee can be calculated based on the development's projected trip generation.

³ Trip Generation Sources: ITE *Trip Generation* (9th Edition); ITE *Trip Generation Handbook: An ITE Proposed Recommended Practice*, (2014);

Table 3: Impact Fee Schedule

Land Uses	Unit of Measure ¹	Basic Rate PM Peak Trips/Unit ²	New Trips % ³	New Trip Rate	Impact Fee Rate
Single Family (1 or 2 dwellings)	dwelling	1	100%	1	\$6,376
Multi Family (3 or more dwellings)	dwelling	0.57	100%	0.57	\$3,635
Senior Housing	dwelling	0.27	100%	0.27	\$1,722
Commercial Services	SF GFA	3.98	100%	3.98	\$25.38
School	student	0.13	100%	0.13	\$829
Institutional	SF GFA	0.74	100%	0.74	\$4.72
Light Industry/ Industrial Park	SF GFA	0.91	100%	0.91	\$5.80
Warehousing/Storage	SF GFA	0.45	100%	0.45	\$2.87
Restaurant	SF GFA	9.02	56%	5.05	\$32.21
General Retail	SF GFA	3.71	66%	2.45	\$15.61
Supermarket	SF GFA	9.48	64%	6.07	\$38.69
Administrative Office	SF GFA	1.49	100%	1.49	\$9.50
Medical Office/Dental Clinic	SF GFA	3.57	100%	3.57	\$22.76

1: For uses with unit of measure in "SF GFA" the impact fee is dollars per square foot, and Trip rate is given as trips per 1000 sqft

2: ITE Trip Generation (9th Edition): 4-6 PM Peak Hour Trip Ends

3: Excludes pass-by trips: see "Trip Generation Handbook: An ITE Proposed Recommended Practice" (2014)

SF= Square Foot GFA= Gross Floor Area

APPENDIX A: DEFECIENCY CALCULATION

EXHIBIT A: TRANSPORTATION DEFICIENCY CALCULATION

ID	Intersection	Existing LOS	LOS Standard	Existing Deficiency %
1	S 216th St/Pacific Highway S (SR 99)	D	F	0
2	S 220th St/Pacific Highway S (SR 99)	B	E	0
3	S 224th St/Pacific Highway S (SR 99)	C	E	0
4	SR 516 (Kent-Des Moines Rd)/Pacific Highway S (SR 99)	F	F	0
5	S 216th St/24th Ave S	B	D	0
6	SR 509 (Marine View Drive/S 216th Street)/Des Moines Memorial Dr	D	E	0
7	7th Ave S/Marine View Dr (SR 509)	C	E	0
8	S 227th St/Marine View Dr (SR 509)	D	E	0
9	Marine View Dr (SR 509)/8th Ave S	B	E	0
10	S 240th St/16th Ave S	B	D	0
11	S 272nd St/16th Ave S	D	D	0
12	S 216th St/11th Ave S	C	D	0
13	S 220th St/Marine View Dr (SR 509)	C	E	0
14	S 222nd St/Marine View Dr (SR 509)	E	E	0
15	S 240th St/Marine View Dr	D	D	0
16	Redondo Wy/Redondo Beach Dr	B	F	0
17	S 250th St/16th Ave	D	D	0

APPENDIX B: COST ALLOCATION RESULTS

The cost allocation results are summarized in this appendix. **Exhibit B** illustrates how the impact fee project costs (shown in Table 1) were divided into growth-related costs attributable to the City. In order to determine this proportion, the City's travel demand model was used to identify the portion of trip-making associated with existing and growth-related traffic. A technique called "select-link" analysis was used to isolate the vehicle trips using each of the impact fee projects. Each project used a specific select link. After the percentage of Des Moines trips and external trips were calculated, the cost of each project was multiplied by the percent of new traffic due to growth within the City. This, as well as the sum of the results, can be seen in **Exhibit B**.

Exhibit C shows several 'project groups' (the first column of **Exhibit B**), which represent the grouping of impact fee projects used in the select link traffic forecasts. Each project group includes impact fee projects that are located within close proximity to each other, representing similar traffic patterns.

Exhibit B List of Transportation Capacity Projects

Project #	Project Group	Project	Location	Total Cost	Percent of New Project Traffic due to Growth within City	Project Costs Allowable for Impact Fees
1	C	South 216th Street	11th Avenue South to 18th Avenue South	\$6,000,000	56%	\$3,336,000
2	C	24th Avenue South	South 216th Street to Kent-Des Moines Road	\$6,531,742	56%	\$3,631,649
3	A	16th Avenue South	Kent-Des Moines Road to South 260th Street	\$18,356,447	63%	\$11,491,136
4	B	Kent-Des Moines Road	Marine View Drive to Pacific Highway South (SR 99)	\$28,266,677	55%	\$15,659,739
5	A	South 236th Lane	Highline College to Pacific Highway South	\$700,000	63%	\$438,200
6	A	16th Avenue South	South 216th Street to South 220th Street	\$3,716,336	63%	\$2,326,426
7	A	16th Avenue South	South 272nd Street to Pacific Highway South (SR 99)	\$6,869,591	63%	\$4,300,364
8	A	20th Avenue South	South 242nd Street to South 244th Street	\$1,689,244	63%	\$1,057,467
9	C	24th/28th Avenue South (SeaTac)	South 200th Street (SeaTac) to South 208th Street	\$100,000	56%	\$55,600
10	C	South 212th Street	24th Avenue South to Pacific Highway South	\$2,000,000	56%	\$1,112,000
11	C	South 216th Street	Pacific Highway South		56%	Included in 16th Avenue South Project

12	C	South 220th Street	Pacific Highway South	\$788,314	56%	\$438,302
13	D	Des Moines Memorial Drive	at South 200th Street	\$350,000	53%	\$186,900
14	D	Des Moines Memorial Drive	at Marine View Drive and South 216th Street	\$2,815,406	53%	\$1,503,427
15	B	Marine View Drive	at South 227th Street	\$788,314	55%	\$436,726
16	A	Marine View Drive	at South 240th Street	\$1,500,000	63%	\$939,000
17	A	16th Avenue South	at South 240th Street		63%	Included in 16th Avenue South Project
18	A	16th Avenue South	at South 250th Street	\$100,000	63%	\$62,600
19	D	Des Moines Memorial Drive South	at South 208th Street		53%	Included in Des Moines Memorial Drive Bike Lane Project.
20	C	Pacific Highway South	Des Moines City Limits	\$212,000	56%	\$117,872
21	D	Des Moines Memorial Drive South	at South 212th Street	0	53%	Included in Des Moines Memorial Drive Bike Lane Project.
22	A	South 240th Street	at 20th Avenue South	\$1,914,476	63%	\$1,198,462
23	C	Marine View Drive South	Des Moines Memorial Drive to Kent-Des Moines Road	\$337,849	56%	\$187,844
TOTAL				\$83,036,395		\$48,479,713

EXHIBIT C LIST OF TRANSPORTATION CAPACITY PROJECTS

Project Group	Project Group Description	Project Total Costs	Percent of New Project Traffic due to Growth within City	Project Costs Allowable for Impact Fees
A	Project Group A: South Des Moines	\$34,846,094	63%	\$3,336,000
B	Project Group B: Kent-Des Moines Road	\$29,054,990	55%	\$3,631,649
C	Project Group C: Central and Northeast Des Moines	\$15,969,904	56%	\$11,491,136
D	Project Group D: Northwest Des Moines	\$3,165,406	53%	\$15,659,739
TOTAL		\$83,036,395		\$48,479,713

APPENDIX C: LAND USE DEFINITIONS

The following land use definitions are derived from the ITE *Trip Generation* (9th Edition). They have been modified as appropriate for the City of Des Moines.

RESIDENTIAL

Single Family: One or more detached housing units located on an individual lot. Also includes accessory dwelling units and duplexes. (ITE # 210)

Multi Family: A building or buildings designed to house three or more families living independently of each other. Includes apartments, condos and attached townhouses. (ITE # 220, 221, 230, 233)

Senior Housing: Residential units similar to apartments or condominiums restricted to senior citizens. (ITE # 251, 255)

COMMERCIAL-SERVICES

The following land use categories fall under the impact fee category “Commercial Services” The rate of 3.98 trips per ksf is based on the average of rates for Auto Care Center, Movie Theater, and Health Club GFA, which represent a broad variety of uses.

- Walk-in Bank (ITE # 911)
- Drive-in Bank (ITE # 912)
- Hair Salon (ITE # 918)
- Copy, Print and Express Ship Store (ITE # 920)
- Drinking Place (ITE # 925)
- Coffee/Donut Shop (ITE # 936, 937, 938)
- Bread/Donut/Bagel Shop (ITE # 939, 940)
- Automobile Care Center (ITE # 942)
- Automobile Parts and Service Center (ITE # 943)
- Automated Car Wash (ITE # 948)
- Health/Fitness Club (ITE # 492, 493)

COMMERCIAL-INSTITUTIONAL

School: The following land use categories fall under the impact fee category “school”. The rate is based on the “High School” ITE trip generation, due it to being most like other types of schools in Des Moines.

- Elementary School (ITE # 520)

- Middle School/Junior High School (ITE # 522)
- High School (ITE # 530)
- Private School (ITE # 534, 536)

Institutional: The following land use categories all fall under the impact fee category “Institutional”. The rate of 0.74 trips per ksf is based on the average of rates for Church, and Hospital.

- Church (ITE # 560)
- Day Care Center (ITE # 565)
- Museum (ITE # 580)
- Library (ITE # 590)
- Hospital (ITE #610)
- Animal Hospital/Veterinary Clinic (ITE # 640)

INDUSTRIAL

Light Industrial/Industrial Park: Industrial parks are a mix of manufacturing, service, and warehouse facilities with a wide variation in the proportion of each type of use from one location to another. Industrial parks include research centers facilities or groups of facilities that are devoted nearly exclusively to research and development activities. Light industrial facilities include printing plants, material testing laboratories, bio-technology, medical instrumentation or supplies, communications and information technology, and computer hardware and software. (ITE #s 110, 130)

Warehousing/Storage: Facilities that are primarily devoted to the storage of materials, including vehicles. They may also include office and maintenance areas. (ITE # 150)

RESTAURANT

Restaurant: The following land use categories fall under the impact fee category “restaurant”. The rate is based on the “Quality Restaurant” ITE trip generation, due it to being similar to other restaurants in terms of new trips, and most similar to the types of restaurants in Des Moines.

- Quality Restaurant (ITE # 931)
- High-Turnover (Sit-Down) Restaurant (ITE # 932)
- Fast-Food Restaurant (ITE # 933, 934, 935)

COMMERCIAL-RETAIL

General Retail: The following land use categories fall under the impact fee category “General Retail”. The rate is based on the “Shopping Center” ITE trip generation, due to it being most like other types of retail shops in Des Moines.

- Tractor Supply Store (ITE # 810)
- Construction Equipment Rental Store (ITE # 811)
- Building Materials and Lumber Store (ITE # 812)
- Free-Standing Discount Superstore (ITE # 813)
- Variety Store (ITE # 814)
- Free-Standing Discount Store (ITE # 820)
- Hardware/Paint Store (ITE # 816)
- Nursery (ITE # 817, 818)
- Shopping Center (ITE # 820)
- Factory Outlet Center (ITE # 823)
- Specialty Retail Center (ITE # 826)
- Automobile Sales (ITE # 841)
- Tire Store (ITE # 848, 849)
- Convenience Market (ITE # 851, 852)
- Discount Club (ITE # 857)
- Wholesale Market (ITE # 860)
- Sporting Goods Superstore (ITE # 861)
- Home Improvement Superstore (ITE # 862)
- Electronics Superstore (ITE # 863)
- Toy/Children’s Superstore (ITE # 864)
- Baby Superstore (ITE # 865)
- Pet Supply Superstore (ITE # 866)
- Office Supply Superstore (ITE # 867)
- Book Store (ITE # 868)
- Discount Home Furnishing Store (ITE # 869)
- Bed and Linen Superstore (ITE # 872)
- Department Store (ITE # 875)
- Apparel Store (ITE # 876)
- Arts and Crafts Store (ITE # 879)
- Pharmacy/Drugstore (ITE # 880, 881)

- Furniture Store (ITE # 890)
- DVD/Video Rental Store (ITE # 896)
- Medical Equipment Store (ITE # 897)

Supermarket: Retail store which sells a complete assortment of food, food preparation and wrapping materials, and household cleaning and servicing items. (ITE # 850, 854)

COMMERCIAL-OFFICE

Administrative Office: An administrative office building houses one or more tenants and is the location where affairs of a business, commercial or industrial organization, professional person or firm are conducted. The building or buildings may be limited to one tenant, either the owner or lessee, or contain a mixture of tenants including professional services, insurance companies, investment brokers, and company headquarters. Services such as a bank or savings and loan, a restaurant or cafeteria, miscellaneous retail facilities, and fitness facilities for building tenants may also be included. (ITE # 710)

Medical Office/Dental Clinic: A facility which provides diagnoses and outpatient care on a routine basis but which is unable to provide prolonged in-house medical/surgical care. A medical office is generally operated by either a single private physician/dentist or a group of doctors and/or dentist. (ITE # 720)