



CITY OF MILWAUKIE

August 23, 2019

Dean Masukawa, LRS Architects
720 NW Davis St., Suite 300
Portland, OR 97209

File: #DEV-2019-009; TFR-2019-001

Site: 37th Ave and Monroe St

Dear Mr. Masukawa:

Please be advised that the above-referenced land use applications have been deemed incomplete, in accordance with Milwaukie Municipal Code (MMC) Subsection 19.1003.3 and Oregon Revised Statutes 227.178. The time period in which the City must take final action is suspended pending resolution of the items listed below.

If you would like to reuse portions of your recently submitted application by replacing affected pages and/or adding new pages, I can make them available to you upon request.

Completeness Items

The following items were found to be incomplete or missing in your application:

1. The application includes an 8-ft fence along the rear property line. Per MMC 19.502.2.B.1A, for residential uses the maximum fence height is 6 ft. Per MMC 19.911.3.B.8, a Type II variance is required to allow an 8-ft fence in the rear yard. A Type II variance application, including a response to the Type II variance approval criteria is required, but was not included.
2. The Transportation Impact Study is incomplete as follows:
 - a. Inadequate response to adjacent planned bicycle facilities – Monroe Street Neighborhood Greenway. An analysis is needed at the proposed project driveway/37th Avenue/Washington Street intersection considering avoidance of impacts on the planned Monroe Street Neighborhood Greenway connection at this same intersection.
 - b. Additional analysis of the 37th Avenue/International Way/Edison Street/Highway 224 intersection is required that treats this as a contiguous and complex single intersection since that is the method in which many of the movements operate.

- c. In the Transportation Impact Study, under Trip Distribution, additional information is required that demonstrates how the distribution pattern was “estimated”.
- d. In the Transportation Impact Study, under Traffic Volumes - Buildout Conditions: provide confirmation that all currently approved, but not yet constructed or occupied, development projects in the city have been incorporated into the 2022 estimates.
- e. Attached comments from DKS Associates.

Approvability Items

The following items are approvability items, not completeness items. They are listed here for your information and should be resolved at the beginning of the review process so that staff has sufficient time to analyze your proposal and formulate a recommendation with regard to approvability.

1. The design drawings should include the following details, which were not included:
 - a. Detailed design of the access driveway to indicate vehicular travel lanes/turn lanes
 - b. Detailed design of the transition from the multiuse pathway to the pedestrian/bicycle route on 37th Ave
 - c. Detailed design of the access driveway to ensure a safe transition from the sidewalk on 37th Ave and the Monroe Street Neighborhood Greenway route across 37th Ave to Washington St
 - d. Detailed design of the 14-ft sound wall along the rear property line, including construction materials to ensure transparency and visibility between the proposed development and users of the multiuse path. Table 19.505.3.D.13 identifies safety considerations in the design of multifamily development, including maximizing visual surveillance, to which the design of this sound wall directly relates. The materials describe the wall as having glazed panels, but a design detail is not provided.
 - e. During discussions in the pre-application conference, it was suggested that plantings could prevent graffiti on the walls of the garages that face the multiuse path. This component also relates to the safety design element in Table 19.505.3.D.13 to ensure that the walls are designed to discourage graffiti.
2. The floor plans for Buildings 2-4 show live/work units on the first floor of all buildings. Please confirm that this is the intent to include live/work units in each of those buildings.
3. As noted in the pre-application conference notes, please provide design details of the proposed 42-in perimeter fence.
4. In the Transportation Impact Study, the analysis of the Railroad Avenue/Oak Street/Monroe Street intersection is not approvable. SimTraffic Simulation is not an acceptable substitution for actual measured and observed delays in the field.

5. In the Transportation Impact Study, the statement that “safe pedestrian routes between the site and nearby vicinity schools are available and adequate” needs to be accompanied with figures and maps demonstrating the safe routes available to be taken.

Informational Items

The following items are informational items, not completeness items. They are meant to help you: prepare for review by the review authority, improve your application in ways that are unrelated to completeness and approvability, and anticipate future building permit requirements.

1. Provide a detailed summary describing your responsibilities regarding construction on a contaminated site. Please include construction methodology, required monitoring information, and other similar information rather than references to DEQ protocols.

Summary

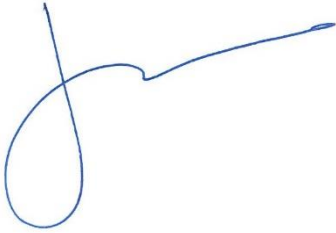
This letter contains the completeness review for both the City Planning and Engineering Departments. DKS Associates have reviewed the Transportation Impact Study for completeness, which can be found in Attachment 1.

Please be advised that no further action will be taken on your application until one of the following events occurs: (1) you submit all completeness items, (2) you submit some completeness items and request that the City deem your application complete, or (3) you submit no completeness items and request that the City deem your application complete. In any of these three instances, we will need 12 copies of your application and all materials to begin the referral and review process. Once your application is deemed complete, staff will review your application for approvability.

Per ORS 227.178, your application will be void if one of the three actions listed above is not taken within 180 days of the date you submitted your application. The date on which your application would become void is January 22, 2020. Please be aware that application fees are nonrefundable. If an application becomes void, the City may retain some or all of the deposits for technical reviews, such as traffic studies or natural resource studies, based on actual costs incurred by the City.

If you feel that we have made an error in our assessment of completeness, please notify us immediately so that we may resolve the issue. If you have any questions or concerns, you can call me at 503-786-7653 or email me at koliasv@milwaukieoregon.gov.

Sincerely,

A handwritten signature in blue ink, consisting of a large loop on the left and a horizontal line extending to the right.

Vera Kolas, Associate Planner

Attachments:

1. DKS Associates review of Transportation Impact Study, dated August 22, 2019

cc: Marc Wyzykowski, Johnson Development Associates, Inc.
Dennis Egner, FAICP, Planning Director
Leila Aman, Community Development Director
Engineering Development Review
Steve Adams, City Engineer
File(s): DEV-2019-009; TFR-2019-001



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Portland, OR 97205
503.243.3500
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Date: August 22, 2019

Request: Monroe Apartments Transportation Impact Study Technically Complete
Comments

Reviewer: Amanda Deering, DKS Associates

P14167-016

DKS Associates has reviewed the transportation impact analysis (TIA) for the Monroe Apartments development¹. The proposed development is located north of Milwaukie Expressway (OR 224), south of SE Monroe Street, east of SE Oak Street, and west of SE 37th Avenue in Milwaukie, Oregon. The project would construct a three to five-story buildings consisting of 234 apartment units. The general comments are based on review of the transportation impact analysis (TIA) materials.

The study provides adequate information to comply with the required scope items identified in the transportation impact study scope.

We have the following comments regarding the study:

- For the intersection of Railroad Avenue at Oak Street, HCM reports should be provided for the intersection, even if alternate method of using SimTraffic results are ultimately reported. Additionally, more context needs to be given on why “significantly inflated delays” are being reported using HCM methodology and what specific intersection operations (complementary turning movements, aggressive driver behavior, etc.) were observed and used to calibrate a more accurate SimTraffic model.
- The level of service at the OR 224 intersections seems to be consistently better than previous results from the 2013 City of Milwaukie TSP update. Please examine and explain why this might be occurring. For example: lower volumes, differences in signal timing (e.g. cycle lengths and lost times), etc.
- For the intersections of 37th Avenue/International Way and Edison Street/OR 224, care should be taken to accurately model the intersections as they operate in the field. Specifically, the free westbound right turn onto OR 224 should be modeled separate from the right turn at 37th Avenue/International Way that leads to the westbound approach of Edison Street/OR 224. Additionally, 37th Avenue/International Way should be modeled with the eastbound approach as free.

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¹ Monroe Apartments Transportation Impact Study, Lancaster Engineering, July 16, 2019.