



CITY OF MILWAUKIE

November 15, 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 Transportation Impact Study is incomplete as follows:
 - a. The study analysis does not reflect the revised plan that proposes a right-out exit onto Monroe St.

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 Transportation Impact Study (Table 7) states that during the PM peak hour the intersection of Railroad Ave at 37th Ave will function at LOS E under both the 2022 background and buildout conditions (with additional delay time). This exceeds the city's mobility standard (LOS D) but no proposed modifications are addressed in the report that will mitigate the impacts here.

2. For the intersection of Railroad Avenue at Oak Street, the TIS analysis and explanation of results was updated based on two recent field studies. The analysis still shows the intersection operating better than the previous Monroe Street Neighborhood Greenway Study (LOS B vs LOS F). The city may be engaging a consultant to provide additional analysis, which could result in intersection design changes.

Note: there are several items in the report where minor editing is needed; this editing affects neither Completeness nor Approvability.

Summary

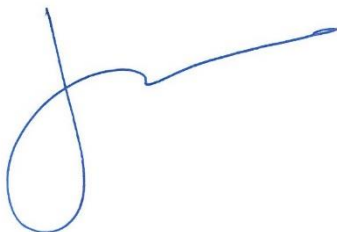
This letter contains the completeness review for both the City Planning and Engineering Departments. DKS Associates also have reviewed the Transportation Impact Study for completeness.

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, appearing to read 'Vera Kolias', with a large loop at the end.

Vera Kolias, Associate Planner

Attachments:

1. DKS Associates review of Transportation Impact Study, dated November 1, 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



720 SW Washington St.
Suite 500
Portland, OR 97205
503.243.3500
www.dksassociates.com

Date: November 1, 2019
Request: Monroe Apartments Transportation Impact Study Review
Reviewer: Reah Flisakowski and Amanda Deering, DKS Associates P14167-019

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 five buildings ranging from three to five stories consisting of 234 apartment units. The general comments and recommendations are based on review of the transportation impact analysis (TIA) materials.

TRANSPORTATION IMPACT ANALYSIS SUMMARY

Key findings from the transportation impact analysis include:

- The proposed project would result in the following estimated increase in motor vehicle trip generation: 79 (21 in/58 out) weekday AM peak hour vehicle trips, 100 (61 in/39 out) weekday PM peak hour trips and 1,274 daily trips. The estimates are based on applying ITE trips rates (Land Use Code 221) to the proposed 234 residential apartment units on the site.
- Traffic operations were analyzed for existing conditions (year 2019) and forecasted conditions (year 2022), when construction of the proposed development is anticipated to be complete. Operations analysis was performed for the AM and PM peak hours at ten study intersections.
- A growth rate of 2% per year was applied to existing traffic volumes to estimate background volumes for year 2022 operations analysis for non-ODOT facilities. For traffic along OR 99E, 0.86 % per year growth rate was applied based on data from ODOT Future Volume Tables. Additional trips from multiple in-process developments were also included in background volume growth.
- The trip distribution estimate showed 35% of site trips traveling to or from the west via Monroe Street and 55% of site trips traveling to or from the south via 37th Avenue. The remaining 10% of trips are estimated to travel to/from the east via Monroe Street and Railroad Avenue. Of these trips, a total of 40% were assigned to/from the north on OR 224 and 30% were assigned to/from the south on OR 224. The locations of likely trip destinations, locations of major transportation facilities in the site vicinity and existing travel patterns at the study intersections were offered as rationale for the trip distribution estimate. The trip distribution is reasonable when compared to the Metro 2015 travel demand model.

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

- During the PM peak hour, the intersection of Railroad Avenue and 37th Avenue exceeds the City of Milwaukie mobility standard (LOS D) under both year 2022 background and buildout conditions operating at LOS E. This is not addressed in the TIA. All other study intersections were found to operate at an acceptable level of service through the 2022 AM and PM peak hours with full buildout of the proposed development.
- Proposed site access would add a fourth leg to the Washington Street/37th Avenue intersection. The proposed driveway would not meet the City's spacing standard of 300-feet for collectors given the small block size. However, it would add a leg to an existing intersection. Additionally, there are no locations along the development site that would meet the spacing standard.
- A parking supply analysis demonstrating adequate parking supply was provided. A total of 339 parking spaces will be available for the development. There will be 297 on-site spaces and 42 on-street spaces. The estimated parking demand of 288 spaces.
- The study identified the pedestrian and cyclist routes to three nearby schools. No improvements were recommended.
- Transit service in the area includes access to four TriMet bus lines within walking or biking distance of the site.
- No significant safety issues were found from the review of the last five years of available collision data at study intersections.

ISSUES TO BE ADDRESSED

- Operating deficiencies at Railroad Avenue/37th Avenue should be addressed in the TIA. Potential intersection mitigations need to be discussed.
- For the intersection of Railroad Avenue at Oak Street, the TIA analysis and explanation of results was updated based on two recent field studies. The analysis still shows the intersection operating better than the previous Monroe Street Neighborhood Greenway Study (LOS B vs LOS F). The intersection was not evaluated in the Milwaukie TSP. The traffic count video is available to review and further evaluate the intersection operations.
- The level of service at the OR 224 intersections seems to be consistently better than previous results from the 2013 TSP. Prior comments during the technically complete review requested that this issue be examined to explain why this might be occurring. The updated TIA did not provide additional narrative.
- The site plan does not show the current design treatments for the multi-use path along SE 37th Avenue and crossing to SE Washington Street.

RECOMMENDATIONS

The following recommendations should be considered in developing conditions of approval for the proposed development:

- Minimum AASHTO sight distance requirements should be met at the proposed driveway access. These should be approved by the City Engineer prior to final site plan approval.
- Operating deficiencies at Railroad Avenue/37th Avenue shall be mitigated.
- Development frontage improvement shall be coordinated with City multi-use path design path along SE 37th Avenue and crossing to SE Washington Street.
- The final site plan should be approved by the City Engineer prior to construction.