



Oregon

John A. Kitzhaber, MD, Governor

Department of Transportation

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June 13, 2012

City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201

ODOT Case No: 5330

Subject: SE 122nd Rezone Project

Attn: John Cole, Senior Planner

We have reviewed the City's proposal to rezone 22 acres of predominantly multi-family residential zoned properties to commercial designations along SE 122nd Ave and Powell Blvd which is a state highway facility. The City is working with the community to develop a vision for the 122nd corridor and the proposed zone changes are intended to encourage redevelopment and revitalization. The proposed changes are grouped into two areas: South of Holgate Blvd along 122nd and in the vicinity of the SE 122nd Ave and SE Powell Blvd intersection. ODOT has determined that the proposed changes for properties south of Holgate Blvd would not have an effect on the highway. However, we do not have enough information to determine the effect of the proposal on the highway for properties located in the vicinity of Powell Blvd and 122nd and have safety concerns at the intersection. To address ODOT concerns, City staff is recommending that all properties at the intersection of Powell Blvd and 122nd Ave be removed from the rezoning proposal. ODOT supports the staff recommendation and appreciates the efforts to address our concerns. We will continue to work with the City and community to address land uses in the Powell Blvd corridor and to develop a path forward that ensures future land use changes meet the community's revitalization aspirations while maintaining a safe and efficient multi-modal transportation system.

For zone changes and comprehensive plan amendments, local governments must make a finding that the proposed amendment complies with the Transportation Planning Rule (TPR), OAR 660-012-0060. There must be substantial evidence in the record to either make a finding of "no significant effect" on the transportation system, or if there is a significant effect, require assurance that the land uses to be allowed are consistent with the identified function, capacity, and performance target of the transportation facility. In determining whether an amendment has a significant effect on a transportation facility only transportation improvements that are identified on the Regional Transportation Plan or have a funding mechanism in place can be relied upon (OAR 660-0060 (4)).

According to the 1999 Oregon Highway Plan (OHP), this facility is classified a District highway and the performance target is 0.99 volume to capacity (v/c) ratio.

Based on the materials provided, ODOT does not have enough information to make a determination of the potential effect of the proposed zone changes in the vicinity of the SE 122nd Ave and SE Powell Blvd intersection. The City of Portland provided a draft traffic analysis dated May 2012. However, the analysis uses the 2035 build model from the Outer Powell TGM Plan, which includes capacity improvements that are not financially constrained. ODOT recommends creating a new base-case model to determine 2035 no-build conditions and a reconsideration of reasonable worst-case land use assumptions to model.

The Powell/122nd intersection is a top 5% Safety Priority Index System (SPIS) location. The SPIS system examines three years of crash frequency, crash rate, and crash severity data to determine where high priority safety fixes are needed. ODOT is currently exploring solutions to improve multi-modal safety both at the intersection and within the influence area. Without knowing what those solutions are, ODOT has concerns that the proposed zone changes could generate additional trips that may exacerbate the existing safety issues. ODOT met with the Bureau of Planning and Sustainability and the Bureau of Transportation who recognized ODOT's safety concerns and agreed that further analysis is warranted.

As the community continues to implement their vision for the area, ODOT looks forward to working collaboratively with the to City determine what effect potential land use changes would have on the transportation system and to resolve safety issues at the 122nd and Powell intersection. Thank you for providing ODOT the opportunity to participate in this land use review. If you have any questions regarding this matter, please contact me at 503.731.8234.

Sincerely,



Seth Brumley
Development Review Planner

C: Avi Tayar P.E., ODOT Region 1 Traffic