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**TO: GREGORY FRANK, HEARINGS OFFICE
SYLVIA CATE, BUREAU OF DEVELOPMENT SERVICES**

FROM: WENDY CAWLEY, PORTLAND BUREAU OF TRANSPORTATION

DATE: DECEMBER 6, 2010

RE: LU 10-167491 CU AD – 3732 SE 99TH AVE

On December 1, 2010, a public hearing before the City's Hearings Officer was held in association with the above referenced land use review case. At the hearing, two neighbors provided testimony regarding what they perceived as transportation issues related to the conditional use review. This memorandum will serve as a written response by PBOT to pertinent testimony provided during the proceedings.

PBOT staff heard the following statements relative to transportation issues:

- Concerns that the traffic study provided by the applicant does not accurately reflect existing conditions, particularly on SE Bush Street.
 - Traffic volumes were collected in November during off-peak times
 - Tri-Met lift operation (originating at the Tri-Met site on 99th Avenue) was not taken into consideration
 - "No Parking" areas on 99th Avenue were not taken into consideration
 - SE Bush Street is not a low volume street
- Concerns that the loss of 9 on-street spaces will have significant neighborhood impacts.
- Concerns that the 26-foot street width proposed for the new Bush Street is too narrow to allow for two-way traffic and parking on both sides of the street.

The applicant submitted a traffic study that included peak traffic volume counts. These counts were taken in November 2009 and showed the highest traffic volumes occurred during the morning peak hour. During this time 35 cars traveled along SE Bush Street (approximately 1 car every 2 minutes.) This equates to about 350 cars traveling on Bush Street every day. The City does not typically see a large fluctuation in traffic volumes on local streets during different times of year and does not require traffic volume adjustments. ODOT does, however, apply seasonal adjustments to traffic counts. If a seasonal adjustment were applied on Bush Street, traffic volumes would be equivalent to about 380 cars per day.

The traffic study estimated traffic volumes upon completion of the ECC expansion in 2012. Given the 30 new employees and a small percentage of growth in traffic, peak traffic volumes on Bush Street are estimated at 52 cars per hour (approximately 1 car every minute.) This equates to about 520 cars traveling on Bush Street every day, or with seasonal adjustments, approximately 565 cars per day. Traffic volumes on local streets in the City of Portland typically range from 500 to 1500 cars per day. With average daily traffic estimated below 600 cars per day, SE Bush Street is considered a low volume street.

It should be noted that traffic volume counts were taken at SE 99th/Powell, SE 99th/Bush and SE 100th/Holgate. These counts were inclusive of cars, trucks, busses, pedestrians and bicycles and would have included any Tri-Met Lift vehicles.

The applicant prepared two exhibits, one showing existing available on-street parking and the other showing available on-street parking when SE Bush Street is reconstructed to the south. Both exhibits show the "No Parking" zones on SE 99th Avenue, which were requested as a security measure by the ECC. They also show that 9 on-street parking spaces will be lost with the relocation of Bush Street. The loss of on-street parking spaces will not negatively impact the ECC. However, it could negatively affect park users since they rely heavily on this on-street parking.

In order to mitigate the loss of on-street parking, the ECC is re-establishing an agreement to share a 36-space parking lot with Ed Benedict Park users. This agreement has been a condition of prior land-use cases. However, the existing parking lot entrance is not oriented toward the park and is not signed as shared parking, making unclear if this parking is available to park users. The new 36-space parking lot entrance will be located on Bush Street, closer to the park, and will be connected to the park with a foot path. Additionally, the parking lot entrance will be signed, in multiple languages, to allow park parking on the weekends and after 5pm on weekdays, which correlates to the highest park usage hours.

During typical weekday work hours, it appears that on-site parking is adequate for daily ECC operations. The location of the new building and parking areas should result in better usage of the northern parking lot, which will leave more room in the visitor lot for visitors, in turn leaving more on-street parking spaces available for neighborhood and park use during the day. It is anticipated that this will offset the loss of on-street parking spaces.

Concerns were raised about the proposed width of the new SE Bush Street. At 26 feet wide, this street width meets City Standards but is considered too narrow by neighbors to accommodate two-way traffic and parking on both sides of the street. This standard has been in place since 1991 and was implemented in response to citizen complaints that current street standards were excessive and encouraged high traffic speeds and volumes, in addition to producing excessive stormwater runoff, requiring wide rights-of-way, wasting natural resources, and requiring clearing of many trees and other vegetation. These narrower "queuing streets", intended for two-way traffic, are comprised of a single traffic lane and a parking lane on one or both sides. When two vehicles meet on a queuing street, one of the vehicles must yield by pulling over into a vacant segment of the adjacent parking lane.

Acceptable operation of a queuing street occurs where there are occasional breaks in the curbside parking to permit the yielding vehicle to pull over. Breaks in parking are provided by individual driveways, combinations of driveways, and intersections. There will be one driveway on the north side of SE Bush Street that will provide space for cars to pull over to allow on-coming vehicles to pass. Additionally, PBOT has agreed to remove parking at each end of the street to provide space for queuing while providing additional sight distance and maneuvering room at the intersections. With these measures, PBOT expects SE Bush Street to operate acceptably.

As concluded in PBOT's initial response to the proposed Conditional Use Development, the above information corroborates previous findings that the development meets Title 33 approval criteria.