



Portland City Auditor

Hearings Office

1900 SW 4th Avenue, Room 3100, Portland, OR 97201

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DECISION OF THE HEARINGS OFFICER

I. GENERAL INFORMATION

File Number: LU 19-163449 PR (Hearings Office 4190013)

Applicant: Ed Trotter
OHSU
3181 SW Sam Jackson Park Rd; Mail Code PP22E
Portland, OR 97239

Applicant's Representative: Christie White
Radler White Parks & Alexander LLP
111 SW Columbia Street #700
Portland, OR 97201

Hearings Officer: Fred Wilson

Bureau of Development Services (BDS) Staff Representative: Mark Moffett

Site Address: 3181 SW Sam Jackson Park Road and others (Oregon Health Science University [OHSU] Campus)

Legal Description: BLOCK 60 LOTS 1-4 E OF SW U.S. VETERANS HOSPITAL RD, PORTLAND CITY HMSTD; BLOCK 82 INC PT VAC STS LOT 1 EXC W 40' INC PT VAC ST LOT 2&3 EXC W 40', PORTLAND CITY HMSTD; BLOCK 93 INC PT VAC STS LOT 1 INC PT VAC ST LOT 2-4, PORTLAND CITY HMSTD; TL 3800 0.09 ACRES, SECTION 09 1S 1E; TL 600 14.19 ACRES, SECTION 09 1S 1E; TL 500 7.41 ACRES, SECTION 09 1S 1E; TL 200 26.24 ACRES LAND & IMPS SEE R327745 (R991090552) FOR AIRSPACE & IMPS & R327746 (R991090555) FOR IMPS, SECTION 09 1S 1E; TL 3200 1.63 ACRES, SECTION 09 1S 1E; TL 8000 0.18 ACRES, SECTION 09 1S 1E; TL 8100 0.32 ACRES, SECTION 09 1S 1E; TL 8200 0.31 ACRES, SECTION 09 1S 1E; TL 500 1.94 ACRES LAND & IMPS SEE R327785 (R991091031) FOR AIRSPACE & IMPS, SECTION 09 1S 1E; TL 100 0.65 ACRES LAND & IMPS SEE R327835 (R991091601) FOR IMPS AND AIR SPACE, SECTION 09 1S 1E; TL 100 0.46 ACRES, SECTION 09 1S 1E; TL 300 0.23

ACRES, SECTION 09 1S 1E; TL 400 2.09 ACRES, SECTION 09 1S 1E; TL 1300 7.96 ACRES, SECTION 09 1S 1E; TL 1400 8.23 ACRES, SECTION 09 1S 1E; TL 1500 3.59 ACRES, SECTION 09 1S 1E

Tax Account Numbers: R668003590, R668004910, R668005640, R991090410, R991090420, R991090430, R991090460, R991090480, R991090550, R991090620, R991090720, R991090830, R991090860, R991090900, R991091030, R991091600, R991091670, R991091700, R991091710, R991091720, R991091730, R991091740

State ID Numbers: 1S1E09AC 08300, 1S1E09AC 03600, 1S1E09AC 03400, 1S1E09AC 03800, 1S1E09AC 03700, 1S1E09AC 03500, 1S1E09 00600, 1S1E09 00500, 1S1E09 00200, 1S1E09DB 03200, 1S1E09AC 00100, 1S1E09AC 08000, 1S1E09AC 08100, 1S1E09AC 08200, 1S1E09AD 00500, 1S1E09AD 00100, 1S1E09DB 00100, 1S1E09 00300, 1S1E09 00400, 1S1E09 01300, 1S1E09 01400, 1S1E09 01500, 1S1E09 00500, 1S1E09AC 03700, 1S1E09 00600, 1S1E09 00200

Quarter Sections: 3328, 3428

Neighborhood: Homestead

Business District: None

District Neighborhood Coalition: Southwest Neighborhoods Inc.

Zoning: EXd, EXcd, EXdp, EXdps (IC), Marquam Hill plan district, Public Recreational Trail (Central Employment base zone with c or Environmental Conservation, d or Design, p or Environmental Protection and s or Scenic Resource overlay zones, with an IC or Institutional Campus Comprehensive Plan Map designation)

Land Use Review: Type III, PR (Marquam Hill Parking Review)

BDS Staff Recommendation to Hearings Officer: Approval.

Public Hearing: The hearing was opened at 8:58 a.m. on August 5, 2019, in the third floor hearing room, 1900 SW 4th Avenue, Portland, Oregon, and was closed at 11:30 a.m. The record

was held open until 4:00 p.m. on August 12, 2019 for new evidence; until 4:00 p.m. on August 19, 2019 for rebuttal only; and until 4:00 p.m. on August 26, 2019 for applicant's rebuttal.

Testified at the Hearing:

Mark Moffett
Bob Haley
Amanda Owings
Christe White
Matt Hughart
Julia Kuhn
Dr. Amy Hermesch
Terri Oelrich Sauvain
Kate Natoli
Ed Fischer
Anton Vetterlein
Milt Jones

II. ANALYSIS

The staff report provides an excellent description of the property and proposed development:

“Proposal: Parking at Oregon Health Sciences University (OHSU) is regulated in the Zoning Code through the Marquam Hill plan district (33.555). A new OHSU hospital expansion project (acronym OHEP) is currently being proposed to include 220 new parking spaces, all for guest or patient parking (versus employee parking, which is not proposed). The parking will be physically located in the OHEP building which would be located mid-campus along two different frontages of (private) SW Campus Drive.

“The OHEP project site is within Subdistrict B in the Marquam Hill plan district (Map 555-1). Any new parking constructed after August 1, 2012 in the plan district requires a Type B Marquam Hill Parking Review (33.555.280.F.2.b). The maximum allowed parking across all of subdistricts A and B is 4,429 spaces (33.555.280.E.1.a), whereas the applicant states the total in this area will be 3,743 after the addition of the 220 proposed new parking spaces. A Type B Marquam Hill Parking Review is processed as a Type III procedure (33.849.100.B), and the approval criteria are found at 33.849.110.B. Proposals that require a Type B review do not also require a Type A review (33.555.280.F).

“The larger OHEP building project will also require a separate Design Review, to evaluate the physical massing and appearance of the building, as well as how it integrates into the surrounding context and pedestrian environment, etc. However, in order to construct the project with the proposed 220 parking

spaces, the applicant must obtain approval of this Type B Marquam Hill Parking Review.

“Site and Vicinity: The site for this application is the entirety of the Oregon Health and Sciences University (OHSU) ownership within the Marquam Hill plan district. The individual future OHEP project that will contain the parking in question is located in the center of campus, but parking is regulated throughout the plan district for overall parking limits. The site includes multiple hospital buildings, educational buildings, parking structures, and accessory buildings and functions across ‘Pill Hill’, with the exception of the US Veterans Hospital complex, to which the OHSU complex is connected by skybridge. The surrounding area includes residential development largely of single-family character, but the neighborhood blocks immediately west of the main campus have some commercial and multi-family development, as well.” Staff Report 2-3.

A. Procedural Issues

The applicable approval criteria for the proposed development are found in Portland City Code (PCC) 33.849.110, which provides:

“A. Approval criteria for Type A Marquam Hill Parking Review. The request for a Type A Marquam Hill Parking Review will be approved if the review body finds that the applicant has shown that all of the following approval criteria are met:

“1. Single-occupancy vehicle trips. Single-occupancy vehicle trips to and from the plan district by the applicant’s employees and students will not exceed the percentages in Table 849-1. The percentages in Table 849-1 vary based on when the application for Marquam Hill Parking Review is submitted.

Table 849-1 Maximum Allowable Single-Occupancy Vehicle Trips	
Date Application for Review is Submitted	Maximum
July 31, 2002 – December 31, 2007	51%
January 1, 2008 – December 31, 2012	48%
January 1, 2013 – December 31, 2017	45%
January 1, 2018 – December 31, 2022	43%
January 1, 2023 – December 31, 2027	41%
After January 1, 2028	39%

“2. PM peak traffic flow rate. The PM peak hour is measured between 4:30 PM and 5:30 PM “a. SW Campus Drive. The PM peak eastbound traffic flow rate on

SW Campus Drive will not exceed the maximums stated in Table 849-2. The measurement will be taken on SW Campus Drive approximately 100 feet west of SW Terwilliger Boulevard. The maximums stated in Table 849-2 vary based on when the application for Marquam Hill Parking Review is submitted.

Table 849-2 Maximum Allowable PM Peak Traffic Flow Rates on SW Campus Drive	
Date Application for Review is Submitted	Maximum PM Peak
July 31, 2002 – December 31, 2015	550
January 1, 2016 – December 31, 2029	500
After December 31, 2029	450

“b. SW Homestead Drive, SW Hamilton Terrace, and SW Condor Lane. The PM peak eastbound traffic flow rate on SW Homestead Drive, SW Hamilton Terrace, and SW Condor Lane attributed to trips made by the applicants employees and students will not exceed the maximums stated in Table 849-3.

Table 849-3 Maximum Allowable PM Peak Traffic Flow Rates	
Street	Maximum PM Peak
SW Homestead Drive	330
SW Hamilton Terrace	100
SW Condor Lane	50

B. Approval criteria for Type B Marquam Hill Parking Reviews. The request for a Type B Marquam Hill Parking Review will be approved if the review body finds that the applicant has shown that all of the following approval criteria are met:

“1. If the proposal is to develop parking in excess of the maximums stated in Table 555-1, or the proposal is to develop parking after August 1, 2012 the following criteria must be met:

“a. The proposal will not by itself, or in combination with other parking facilities in the area, significantly lessen the overall desired character of the area. The desired character of the area is determined by the Marquam Hill vision, policies, and objectives, the Marquam Hill Plan Functional Areas Site Development Concept, the Marquam Hill Vehicular Circulation Site Development Concept, and the Marquam Hill Pedestrian Circulation Site Development Concept;

“b. The transportation system is capable of supporting the proposed facility in addition to the existing uses in the area. Evaluation is based on a transportation impact analysis and includes factors such as street capacity and level of service,

on-street parking impacts, access requirements, impacts on transit operations and movement, impacts on the immediate and adjacent neighborhoods, and pedestrian and bicycle safety

"c. The proposal is consistent with any area plans adopted by the City Council as part of the Comprehensive Plan, such as neighborhood or community plans.

" 2. If the proposal would otherwise be subject to Type A Marquam Hill Parking Review but does not meet the approval criteria for that review, the applicant must demonstrate how those approval criteria will be met within three years. The standards that must be met within three years are the standards that will be in effect at the end of the three year period, rather than the standards in effect when the application is submitted.

"If the applicant cannot demonstrate that this criterion is met, the criteria of Paragraph B.1, above, must be met."

Opponents initially argue that PCC 33.849.110.A provides the applicable approval criteria. According to opponents, the tables in PCC 33.849.110.A are applicable to the proposed use and are not satisfied. While PCC 33.849.110 is perhaps not crystal clear in expressing that there are two separate tracts for obtaining approval, PCC 33.849.110.B. provides that the approval criteria of PCC 33.849.110.B.1.a-c must be met when Type A review cannot be satisfied "or the proposal is to develop parking after August 1, 2012 * * *." This establishes that one or the other of Type A review or Type B review is required. This is further clarified by PCC 33.555.280.F, which provides:

"Marquam Hill Parking Review. There are two types of Marquam Hill Parking Review: Type A and Type B. Proposals that are subject to Type B Marquam Hill Parking Review are not also subject to Type A Marquam Hill Parking Review."

The applicant's attorney provides a thorough explanation of why such parking reviews are on a two tract system and why the current application must be processed as a Type B review, but even without that explanation this application was filed after August 1, 2012, and by the express terms of PCC 33.849.110.B.1 Type B review is the only review that is required.

Opponents also argue that the applicant must satisfy PCC 33.849.110.B.2. PCC 33.849.110.B.2 expressly states that it only applies if "the proposal would otherwise be subject to Type A Marquam Hill Parking Review * * *." As explained, the application is not otherwise subject to Type A review. Therefore, PCC 33.849.110.B.2 does not apply.

While opponents' arguments are difficult to follow, they also appear to appear to argue that there were procedural errors committed during the scoping process for the traffic impact analysis (TIA) and preliminary communications with neighborhood opponents. As staff explained at the public hearing, such preliminary communications were not related to any

approval criteria and would not provide a basis to deny the application. While opponents are free to challenge the TIA under the applicable approval criteria (which they do), any alleged procedural errors were not related to any applicable approval criteria.

B. Type B Approval Criteria

PCC 33.849.110.B.1.a-c provide the three approval criteria for the proposed use.

1. PCC 33.849.110.B.1.a

PCC 33.849.110.B.1.a provides:

“The proposal will not by itself, or in combination with other parking facilities in the area, significantly lessen the overall desired character of the area. The desired character of the area is determined by the Marquam Hill vision, policies, and objectives, the Marquam Hill Plan Functional Areas Site Development Concept, the Marquam Hill Vehicular Circulation Site Development Concept, and the Marquam Hill Pedestrian Circulation Site Development Concept;”

PCC 33.849.110.B.1.a requires the proposed parking will not “significantly lessen the overall desired character of the area.” The “desired character of the area” is to be determined by considering various Marquam Hill plans, policies, and concepts. This is an inherently subjective criterion. The staff report considered arguments made by the applicant and opponents and adopted findings submitted by the applicant. I have reviewed those findings, have considered the arguments of opponents, and agree with the findings in the staff report. I adopt those findings and repeat them for convenience:

“The proposal is squarely consistent with the Marquam Hill vision, policies and objectives, the Functional Areas Site Development Concept, the Vehicular Circulation Site Development Concept, and the Pedestrian Circulation Site Development Concept.”

“Relevant text of the Vision statement is excerpted by quotation and discussed here. The Vision states that the future OHSU Marquam Hill campus is ‘a dense urban campus that includes a world class medical teaching university, OHSU, Shriners Hospital for Children, the Veterans Affairs Medical Center and other places of learning and inquiry.’”

“Marquam Hill has certainly developed consistent with this Vision and the proposed 220 space patient parking request continues to be consistent with this Vision. The Hospital Expansion and related parking request will continue to create the ‘dense urban campus’ that will provide world class medical services

to the patients who will be cared for in the Hospital Expansion and have easy access to parking within the proposed project.”

“Visitors are welcomed to the campus through entrances that signify transition into a distinct environment.’ As discussed below, the Marquam Hill Plan created three organizational concepts around location of functional areas, vehicular circulation priorities and pedestrian connections. The Campus Drive/Terwilliger Boulevard entrance is the selected entrance and exit under each of these concepts to the medical facilities for patients. As they enter through Campus Drive, the area transitions as envisioned in the Marquam Hill Plan from a parkway like experience to the ‘dense urban campus’ that is Marquam Hill. The Vision specifically calls out this transition at this important entrance as welcoming to those who need the services provided on Marquam Hill. This parking proposal is highly consistent with this Vision statement by reinforcing the Campus Drive intersection with Terwilliger as an important and welcoming gateway to and from Marquam Hill and by offering operational improvements to this gateway that will help patients navigate the campus through this distinct transition. As discussed below, OHSU has offered a voluntary mitigation measure to install a signal at the intersection of Campus Drive and Terwilliger to further improve the level of service exiting from Campus Drive in the AM peak hour. Signalizing this gateway intersection will not only improve level of service on Campus Drive and serve that ‘welcoming’ function, it will also mark the transition from the parkway to the urban development on the Hill while increasing safety for pedestrians and bicyclists who also navigate this intersection. As discussed below under the Vehicular and Functional Areas Concepts as well as the Terwilliger Parkway Corridor Plan, signalization of this gateway intersection has been addressed in a number of planning documents, and now 16 years after the adoption of the Marquam Hill Plan and 36 years after the adoption of the Terwilliger Parkway Corridor Plan, the circumstances have arisen that could, if desired, justify a signal at this important transition and gateway.”

“Access to Marquam Hill is fast, convenient and efficient for everyone who wants or needs to get there. The commitment by the institutions and the residents alike to reduce automobile trips has paid off and a broad range of transportation options is available to access Marquam Hill...Everyone agrees that Marquam Hill has excellent transportation and the adverse impacts of automobiles have decreased...Fewer than forty percent of employees and students access Marquam Hill via single occupant vehicles...Restrictions on the amount of parking reinforce the need for continuous improvement in the transportation demand management goals.”

"This proposal is consistent with the character statement contained in this Vision text. The Vision statement refers to the year 2030, yet many of these aspirations have already been achieved and will continue to be achieved through 2030. Access to Marquam Hill is fast, convenient and efficient through multiple modes of transportation including express bus lines, the aerial tram and the automobile. Adverse impacts of the automobile that could have occurred with the permitted and anticipated density of the medical campus have been largely avoided by an aggressive Transportation Demand Management (TDM) plan that has achieved a 38% SOV rate by employees by 2017. Under the Marquam Hill Plan, the goal for employee single occupancy vehicle trip making was 39% by 2028. The campus, through its reduction in parking and other significant efforts, has reached the 2028 goal a full decade ahead of what was envisioned. This remarkable progress has significantly reduced the adverse impacts of cars on the Hill. This proposal continues that Vision by requesting only a fraction of the parking that would otherwise be permitted by the Marquam Hill Plan District. While 675 spaces would be permitted under the parking ratio, only 220 are requested and the total supply of parking in Subdistricts A and B is hundreds of spaces below the permitted maximum."

"Marquam Hill is an example of how desires and needs that may appear to be contrasting, or even conflicting, can be creatively folded together to form a unique, balanced and successful urban environment.' This proposal adds more parking to the Hill. Consistent with this last sentence of the Vision statement, one could assume that more cars would seem to conflict with an overall goal of reducing trips to the Hill. But on closer evaluation, this proposal is only for patient parking to provide convenient access for those who are in need of medical care and often not able to ride the bus, walk or cycle to their appointment/procedure, and is folded together with a more aggressive and lower parking ratio than permitted by the code, in the context of an employee SOV rate that is well ahead of the desired rate, and coupled with a proposal to enhance the transition and gateway at the Campus Drive intersection with Terwilliger Boulevard that will make more efficient and safer ingress and egress to Marquam Hill for patients and visitors."

"For these reasons, the proposal is highly consistent with the character of the area as articulated through the 2030 Marquam Hill Vision."

"The location of the parking proposal is also consistent with the character of the area as defined by the Functional, Vehicular and Pedestrian Site Development Concepts."

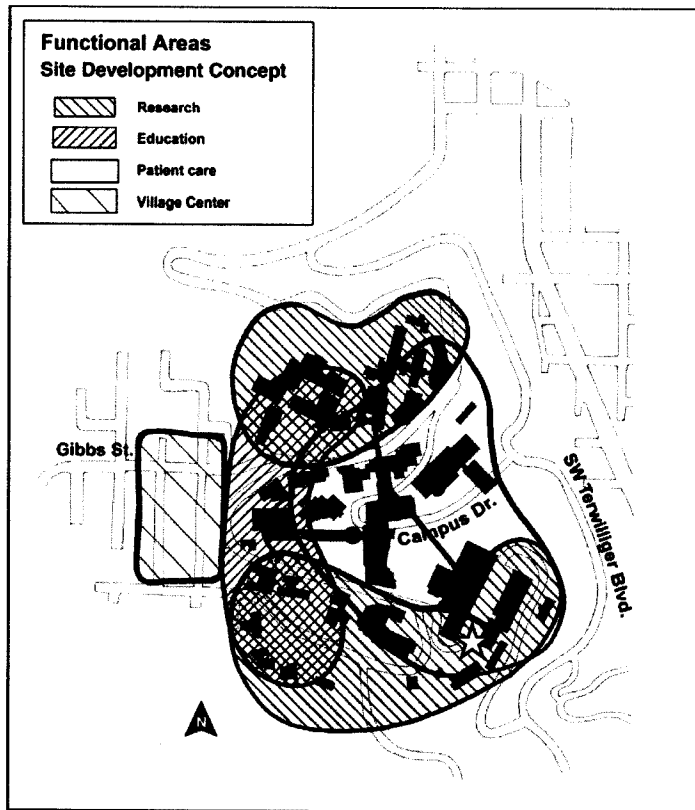
"The following findings are excerpted from the Kittelson Transportation Study that was also required to address these criteria. For ease of reference, those findings are repeated here. Most notably, this approval criteria requires a finding that the proposal will not by itself, or in combination with other parking facilities in the area, significantly lessen the overall desired character of the area. Instead, this proposal directly implements and furthers the character of the area as defined by these Site Development Concepts."

"The Functional Areas Site Development Concept recognizes three primary activities that occur at the Marquam Hill institutions (research, education and patient care) and the need to provide a cohesive and integrated interface between institutional and residential areas. Seven goals relate to the achieving the Functional Area Concept. The proposed Hospital Expansion and patient parking are being designed to support all the goals, but in particular address:

- Promote synergy by placing the institutional core functions (research, education, and patient care) in areas where these uses will interact with each other in an efficient manner.
- Complement the Vehicular Circulation Site Development Concept.
- Locate patient care facilities including access to parking within the central area of the campus.
- Reinforce the use of SW Sam Jackson Park Road as the primary vehicle access route into the campus for employees, students, as well as freight and service vehicles by locating facilities, including access to parking, appropriately.
- Complement the Pedestrian Circulation Site Development Concept."

"For reference purposes, the Plan's Functional Areas Site Development Concept map is provided as Figure 1 below with a star indicating the location of the proposed Hospital Expansion within the center of the Patient Care area, consistent with the Plan."

“Figure 1 – Marquam Hill Plan Functional Areas Site Development Concept



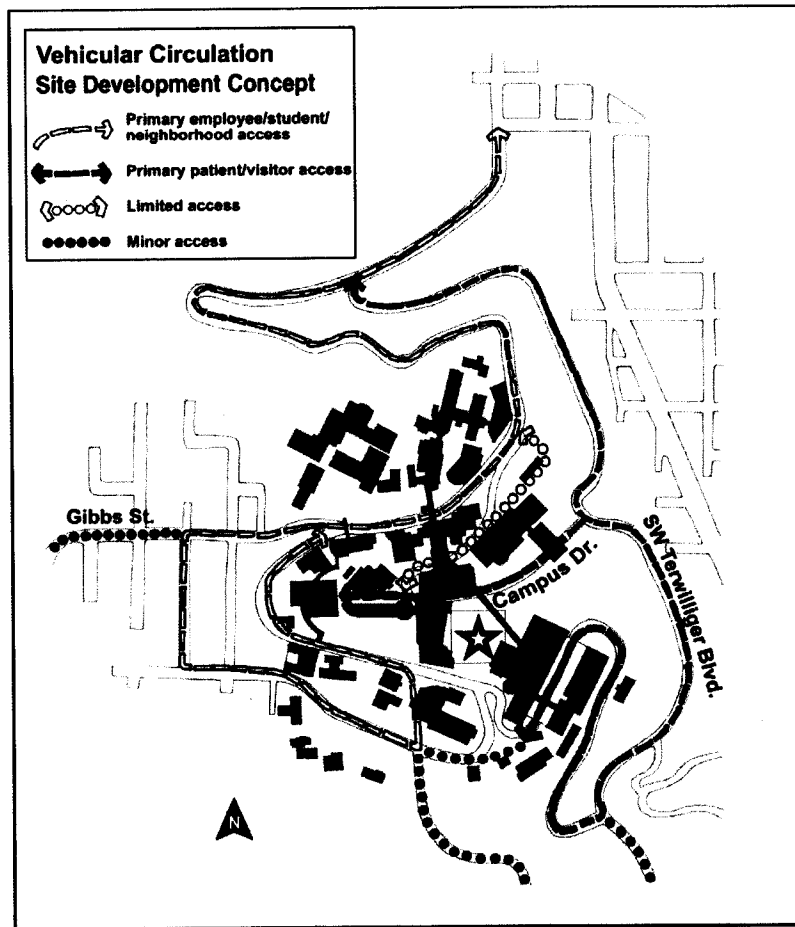
“Within the Plan, the Vehicular Circulation is intended to ‘manage overall single occupant vehicle trips and transportation related impacts,’ to support the functional areas and complement the pedestrian environment. Nine goals support achieving the desired concept design. The proposed Hospital Expansion and parking are consistent with each of these goals but particularly support the following goal:

- Reinforce the intersection of SW Campus Drive and Terwilliger Boulevard as the primary vehicular access entry point for patients into the campus by locating patient care facilities including access to parking within the central area of the campus.

“As shown in both Figures 2 and 3, the Hospital Expansion is in the center of the Patient Care functional area and along SW Campus Drive, which is identified as the primary patient access roadway. Vehicular access into the proposed patient parking within the building will be provided at a single location on SW Campus Drive, thereby reinforcing SW Campus Drive and Terwilliger Boulevard as the primary patient entrance into this central part of campus. Further, as noted previously, the proposed parking supply is well

below the amount that would be allowed under the Zoning Code, thereby reflecting OHSU's commitment to reducing vehicular travel to campus. As planned, the Hospital Expansion design and placement is consistent with and helps achieve the Vehicular Circulation Site Development Concept.

"Figure 2 – Marquam Hill Plan Vehicular Circulation Site Development Concept



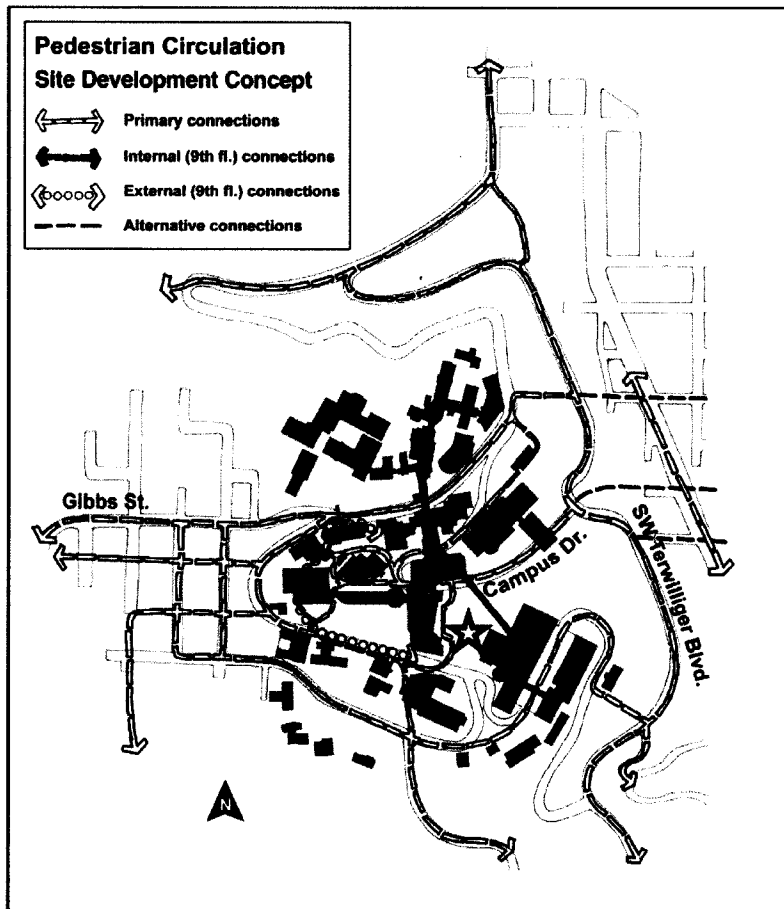
"Within the Plan, the Pedestrian Circulation Concept is 'organized to ensure efficient movement between the campus primary functional areas, improve connection with the larger regional pedestrian system and transit service, and to facilitate pedestrian access through campus for students, employees, and area residents. 'Eight goals are identified to achieve this vision and the Hospital Expansion helps toward meeting these goals, in particular:

- Promote increased pedestrian connections with transit stops.
- Promote pedestrian recreation and commuter activities by students and staff through the development of trip end facilities in the central campus area.

- o Promote the development of new pedestrian routes to improve connections between the institutional campus and local destinations, such as adjacent neighborhoods and Terwilliger Parkway, and more distant destinations, such as downtown and the North Macadam District."

"Figure 3 reflects the Pedestrian Circulation Development Concept from the Plan and shows the location of the proposed Hospital Expansion on a primary pedestrian connection route and recognizes the 'internal 9th floor connections' to be made between primary patient care facilities within the core campus area. The Hospital Expansion is anticipated to provide both skybridge connections to enable essential access between the existing hospital and the expansion area for patients, physicians and staff as well as strong street-level pedestrian connections between buildings. As proposed, the Hospital Expansion design and placement is consistent with and helps achieve the Pedestrian Circulation Site Development Concept."

"Figure 3 – Marquam Hill Plan Pedestrian Circulation Site Development Concept



“Based on the above discussion, the location, design and parking supply provided within the proposed Hospital Expansion is consistent with and helps to achieve the goals and aspirations of the Marquam Hill Plan Vision, Functional Area Site Development Concept, Vehicular Circulation Site Development Concept, and Pedestrian Circulation Site Development Concept. Therefore, this criterion is met.” Staff Report 7-13.

Opponents, particularly Friends of Terwilliger, argue that that the proposal would lessen the overall desired character of the area. Opponents cite some of the applicable goals, policies, and objectives, and they make some reasonable arguments. Even assuming that opponents are correct that some of the applicable goals, policies, and objectives cut against the application, the analysis requires a balancing of the provisions that weigh in favor of the application not lessening the overall desired character of the area and those that weigh against. Again, while this is an inherently subjective criterion, and reasonable minds could differ, I agree with the applicant and staff that the goals, policies, and objectives discussed in the staff report outweigh any goals, policies, and objectives provided by opponents.¹

PCC 33.849.110.B.1.a is satisfied.

2. PCC 33.849.110.B.1.b

PCC 33.849.110.B.1.b provides:

“The transportation system is capable of supporting the proposed facility in addition to the existing uses in the area. Evaluation is based on a transportation impact analysis and includes factors such as street capacity and level of service, on-street parking impacts, access requirements, impacts on transit operations and movement, impacts on the immediate and adjacent neighborhoods, and pedestrian and bicycle safety[.]”

The applicant provided a TIA from their traffic engineer that determined the transportation system is capable of supporting the proposed facility in addition to the existing uses in the area. The Portland Bureau of Transportation (PBOT) reviewed the TIA and agreed that the transportation system is capable of supporting the proposed facility in addition to the existing uses in the area. The staff report considered arguments made by the applicant and opponents and adopted findings submitted by PBOT. I have reviewed those findings, have considered the arguments of opponents, and agree with the findings in the staff report. I adopt those findings and repeat them for convenience:

¹ Opponents argue that a Memorandum of Understanding between the City and OHSU provides applicable provisions, I agree with the applicant and staff that the MOU is not applicable to the current application.

"Portland Transportation/Development Review has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services."

"PBOT staff including a senior planner and traffic engineer working in PBOT's Development Review section has reviewed the materials submitted by Christe White with Radler White Parks & Alexandra, and Kittelson & Associates. PBOT staff concurs with their findings and conclusion for a Type B Marquam Hill Parking Review. The approval criteria for a Type B parking review are found in PCC 33.849.110.B. These criteria expressly assume that OHSU is not subject to the Type A maximum allowable flow rates on identified streets after August 2012. Because this application was submitted in 2019, the applicants are requesting a Type B parking review in compliance with the code."

"The approval criteria for a Type B parking review are found at PCC 33.849.110.B. These codified approval criteria expressly assume that OHSU will not meet the Type A maximum allowable flow rates on identified streets after August of 2012, and therefore establish parameters for an updated traffic analysis associated with each new parking proposal after that date. A Type A Parking Review also establishes expectations of the percentage of trips made by single occupancy vehicles by employees and students. This parking proposal is limited to patients, and therefore a Type A review and its criteria are not relevant or applicable to this request."

"PBOT's traffic engineer reviewed the draft scope of the study and approved the final scope bases on based on accepted traffic engineering principles and practices. What follows is Kittelson's study addressing PCC 33.849.110.B.1.b. PBOT reviewed the potential impacts of adding 220 patient/visitor parking spaces to the campus on the existing transportation facilities based on the evaluation factors in the transportation related approval criteria."

"Transportation Impact Analysis (Chapter 33.849.110.B.1.b)"

"This section addresses the operational impacts of the new traffic estimated to be generated by the 220 patient parking spaces proposed within the hospital expansion. The scope of this study was determined through consultation with PBOT staff and documented in the 1/24/19 Traffic Scope Approval Form (see Appendix A)."

"Per Section 33.849.110.B.1.b, the following transportation-related criteria must be addressed:

b. The transportation system is capable of supporting the proposed facility in addition to the existing uses in the area. Evaluation is based on a transportation

impact analysis and includes factors such as street capacity and level of service, on-street parking impacts, access requirements, impacts on transit operations and movement, impacts on the immediate and adjacent neighborhoods, and pedestrian and bicycle safety."

"The City of Portland Administrative Rule TRN 10.27 - *Administrative Rules for Traffic Capacity Analysis in Land Use Review Cases* provides standards for traffic impact studies required in the course of land use review or development. A summary of TRN 10.27 is provided below."

"For traffic impact studies required in the course of land use review or development, the following standards apply:

- 1. For signalized intersections, adequate level of service is LOS D, based on a weighted average of vehicle delay for the intersection.*
- 2. For stop-controlled intersections, adequate level of service is LOS E. Level of service for two-way stop-controlled intersections is based on individual vehicle movement, and all-way stop controlled intersections is based on a weighted average of vehicle delay for the intersection.*
- 3. An amendment or other land use application that requires analysis of traffic capacity and allows development that either (1) may cause a transportation facility to perform below the standards established in sections 1 and 2, or (2) adds vehicle trips to a facility that is already performing below the standards established in sections 1 and 2 may be approved if:*
 - a. Development resulting from the amendment or other land use application will mitigate the impacts of the amendment or other land use application in a manner that avoids further degradation to the performance of the facility by the time of development through one or more of the following:*
 - (i) the development is limited to result in no net increase in vehicle trips over what is allowed by the existing zoning;*
 - OR*
 - (ii) one or more combination of transportation improvements or measures are imposed to mitigate the transportation impacts of the amendment or other land use application in a manner that avoids further degradation to the performance of the facility by the time of any development."*

"The analyses of street capacity and level of service is based on operational analyses of the following intersections during the weekday AM and PM peak hour under both existing conditions as well as those conditions that are forecast to occur with

continued regional growth and completion of the hospital expansion (the numbers below correspond with the figure numbering for each intersection as well):

1. SW Terwilliger Boulevard/SW Sam Jackson Park Road
2. SW Campus Drive/SW Sam Jackson Park Road
3. SW Terwilliger Boulevard/SW Campus Drive
4. SW Terwilliger Boulevard/SW Lowell Lane/SW Homestead Drive
5. SW Terwilliger Boulevard/SW Hamilton Street
6. SW Terwilliger Boulevard/SW Capital Highway"

"All intersection operational analysis conducted as part of this review was based on the procedures included in the *2000 Highway Capacity Manual* and using the Synchro software package."

"Estimated Vehicular Trips Attributable to Patient Parking

Often, the anticipated vehicular trips associated with a new building are calculated based on information contained in *Trip Generation*, 10th Edition (as published by the Institute of Transportation Engineers). However, the national data contained in this reference related to hospitals does not reflect OHSU's demonstrated commitment to significant vehicular trip-making reductions (current drive alone rate is at 38 percent, well below other hospitals in the Portland Metro area as well as nationwide) as well as the fact that the hospital expansion will only be providing parking for patients, at a level much below that which would be allowed by the Zoning Code. As encouraged within the *Trip Generation Handbook* and requested by City staff in the approved traffic study scope, local data was used to estimate the trips associated with the new patient parking in lieu of national data."

"To calculate the trips associated with the proposed patient parking, OHSU provided counts of all entering and exiting vehicles at its two patient-focused garages on Marquam Hill over the course of a typical mid-week day, in five-minute increments. This five-minute in/out garage data was summarized and used to develop both an hourly profile of entering/exiting trips as well as a calculated trip generation rate per parking space. *A summary of this data is provided in Appendix B.* Based on this data, the trip rate associated with the new garage was calculated as:"

"Weekday AM Peak = 0.28 trips per parking space (80% inbound, 20% outbound); and,
Weekday PM Peak = 0.25 trips per parking space (28% inbound, 72% outbound)."

"Using these calculated trip rates, Table 1 presents the vehicular trips associated with the 220 patient parking spaces proposed within the hospital expansion."

Table 1. Patient Parking Vehicular Trip Generation

Size	Weekday AM Peak Hour			Weekday PM Peak Hour			
	Total	In	Out	Total	In	Out	
Hospital Patient Parking Garage	220 Spaces	62	49	13	54	15	39

“Existing Traffic Operations Analyses

Turning movement counts were collected at the study intersections in February 2019 while local schools and OHSU were in full session and no inclement weather was present that would result in atypical trip-making. For the purposes of the assessment, traffic counts were collected during the morning peak hour (7:00 to 9:00 AM) and the evening peak hour (4:00 to 6:00 PM) time periods. *Appendix “C” contains the traffic count worksheets.*”

Figure 1 provides a summary of the existing lane configurations and traffic control devices, while Figure 2 summarizes recorded traffic volumes and peak hour intersection operations. As shown in Figure 2, all study intersections satisfy City of Portland intersection operational standards under today’s conditions during the weekday AM and PM peak hour with the exception of the SW Terwilliger Boulevard/SW Campus Drive intersection. During the weekday AM peak hour, the eastbound approach (i.e., SW Campus Drive) operates at a level-of-service (LOS) F today. This existing deficiency has also been highlighted by other past and recent studies conducted in the area. *Appendix “D” contains the existing conditions intersection analysis worksheets.*

“Year 2022 Background Traffic Operations Analyses

Background” year 2022 traffic volumes (i.e., no added patient parking) at the study intersections were developed based on the following:

- Applying a one percent growth rate per year to account for continued regional growth in traffic volumes to the existing weekday AM and PM hour counts; and,
- Adding the trip generation associated with an approved 103-room, long-term stay hotel at 836 SW Gibbs Street (Portland LU 17-273735 AD).”

“The resulting traffic volumes and intersection operations are reflected in Figure 3. As shown, all intersections are forecast to operate acceptably during both peak hours with the exception of the SW Campus Drive/SW Terwilliger Boulevard intersection. As described in the existing conditions, the eastbound approach (SW Campus Drive) is anticipated to continue operating at LOS “F” during the weekday AM peak hour.”

“Year 2022 Total Traffic Operations Analyses

The year 2022 total traffic operations were analyzed by adding the vehicular trips associated with the hospital expansion parking spaces to the background traffic volumes. The estimated distribution and assignment of the hospital expansion-related traffic volumes during the two study time periods is shown in Figure 4. Figure 5 presents the total traffic volumes and traffic operations. As shown and discussed under the existing and background conditions, the eastbound SW Campus Drive approach continues to operate at LOS F during the weekday AM peak hour.”

“As previously discussed, OHSU is proposing a much lower number of parking spaces within the hospital expansion than the supply that would be allowed by the Zoning Code (220 spaces provided versus the 675 spaces that would be allowed within the building). The SW Campus Drive/SW Terwilliger LOS F condition during the weekday AM peak hour condition is an existing deficiency. Limiting the parking to a level one-third of which could be provided by the Zoning Code is a significant mitigation to help limit the impacts to this intersection and to meet the intent of TRN 10.27.3.”

“SW Campus Drive/SW Terwilliger Boulevard Voluntary Mitigation

Despite the fact that OHSU is limiting the trips that would otherwise be allowed at this intersection, they are also offering to construct a traffic signal at this intersection to improve the LOS to acceptable levels and to enhance the experience, comfort, and convenience of cyclists, pedestrians and vehicles traveling through this intersection over the long-term. As such, we performed an analysis of traffic signal warrants in accordance with the procedures included in the *Manual on Uniform Traffic Control Devices (MUTCD)* using 24-hour traffic counts conducted in February 2019 on both SW Campus Drive as well as SW Terwilliger Boulevard adjacent to the intersection. Based on these counts, the intersection meets 4-hour, 8-hour and peak hour warrants per the MUTCD procedures under existing conditions. Table 2 presents the LOS at the intersection with and without the traffic signal under all scenarios analyzed.”

Table 2. LOS with Traffic Signal

Scenario	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Stop Control	Traffic Signal	Stop Control	Traffic Signal
Existing Conditions	F	B	D	A
Background Conditions	F	B	D	A
Total Traffic Conditions	F	C	E	B

“The installation of a traffic signal at the SW Campus Drive/SW Terwilliger Boulevard intersection would improve the LOS in the AM to an acceptable LOS (in compliance with TRN 10.27) and would maintain acceptable levels during the weekday PM peak hour. This signal would also provide significant benefits for pedestrians crossing SW Terwilliger Boulevard. The installation of a signal at this intersection should be