clemow associates LLC

APPROVED
City of Florence
Community Development
Department
C Exhibit PC 21 22 DR 01 File Number

EXHIBIT C

February 5, 2021

City of Florence
Attention: Wendy Farley-Campbell, AICP
250 Highway 101
Florence, Oregon 97439

Oregon Department of Transportation
Attention: Douglas Baumgartner, P.E.
455 Airport Road SE, Bldg. B
Salem, Oregon 97301

Sent via email to: Wendy.FarleyCampbell@ci.florence.or.us, Douglas.G.Baumgartner@odot.state.or.us

Re: **Shore Pines Residential Development – Florence, Oregon**
Traffic Impact Study (TIS) Scoping Letter

C&A Project Number 20201006.00

Dear Ms. Farley-Campbell and Mr. Baumgartner,

This Traffic Impact Study (TIS) scoping letter supports the proposed Shore Pines project in Florence, Oregon. The purpose of this letter is to provide sufficient information to the City of Florence (City) and the Oregon Department of Transportation (ODOT) to fully define the TIS scope of work. The following items are specifically addressed:

1. Property Description, Proposed Development, and Land Use Actions
2. Traffic Impact Study Requirements
3. Trip Generation
4. Trip Distribution and Traffic Assignment
5. Study Area
6. Planned Infrastructure Improvements
7. Property Access
8. Summary

1. PROPERTY DESCRIPTION, PROPOSED DEVELOPMENT, AND LAND USE ACTIONS

The subject property is located in the north portion of Florence, generally between 35th and 42nd Streets and east of the Oregon Coast Highway (US 101). The property is described as tax lot 500 on Lane County Assessor's Map 18-12-14-33 and is 106,987 square feet in size. Property access is to US 101. The property is currently undeveloped, and the location is illustrated in the attached Figure 1.

The proposed development includes 68 residential units, including 34 3-bedroom units in one 3-story building, and 34 1-bedroom units in a second 3-story building. Based on the applicant's preliminary site plan, the development will have a public roadway connection to US 101 near the southwest property corner. A copy of the preliminary site plan is attached for reference.

The proposed specific development is an allowed use in the existing Highway District (H) zone designation. The proposed land use action is for development review.

2. TRAFFIC IMPACT STUDY REQUIREMENTS

Based on the Florence City Code (FCC), if a TIS is required, it shall conform with the criteria presented in FCC Section 10-35-2-5 – *Traffic Study Requirements.* More specifically, FCC *Administrative Regulations* for *Traffic Impact Studies,* Section 10-1-1-4.E.2 – *Criteria for Warranting a Traffic Impact Study*, states,

> *"All traffic impact studies shall be prepared by a professional engineer in accordance with the requirements of the road authority. The City shall require a Traffic Impact Study (TIS) as part of an application for development; a proposed amendment to the Comprehensive Plan, zoning map, or zoning regulations; a change in use, or a change in access, if any of the following conditions are met:*
>
> *a. A change in zoning or plan amendment designation where there is an increase in traffic or a change in peak-hour traffic impact.*
>
> *b. Any proposed development or land use action that may have operational or safety concerns along its facility(s), as determined by the Planning Director in written findings.*
>
> *c. The addition of twenty-five (25) or more single-family dwellings, or an intensification or change in land use that is estimated to increase traffic volume by 250 Average Daily Trips (ADT) or more, per the ITE Trip Generation Manual.*
>
> *d. A change in land use that may cause an increase in the use of adjacent streets by vehicles exceeding the 20,000-pound gross vehicle weights by 10 vehicle trips or more per day.*
>
> *e. The location of the access driveway does not meet minimum sight distance requirements, or is located where vehicles entering or leaving the property are restricted, or such vehicles queue or hesitate on the State highway, creating a safety hazard.*
>
> *f. A change in internal traffic patterns that may cause safety problems, such as backed up onto a street or greater potential for traffic accidents.*
>
> *g. The Planning Director, based on written findings, determines that a TIS is necessary where traffic safety, street capacity, future planned facility, or multimodal concerns may be associated with the proposed development. The City will consider the following criteria when determining the need for a TIS:*
>
> *i. If there exist any current traffic problems, such as high accident location, poor roadway alignment, or capacity deficiency that are likely to be compounded as a result of the proposed development.*
>
> *ii. If it is anticipated the current or projected level of service of the roadway system in the vicinity of the development will exceed minimum standards.*
>
> *iii. If it is anticipated that adjacent neighborhoods or other areas will be adversely impacted by the proposed development.*

h. A road authority with jurisdiction within the City may also require a TIS under their own regulations and requirements."

This letter provides additional information to allow the City and ODOT to fully define the TIS scope of work.

3. TRIP GENERATION

The proposed development contemplates 68 residential apartments in two 3-story buildings. Development trip generation was estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition, and practices from the ITE *Trip Generation Handbook*, 3rd Edition and is presented in the following table.

TABLE 1 – DEVELOPMENT TRIP GENERATION

Land Use	ITE Code	Size	Daily	PM Peak Hour		
				Enter	Exit	Total
Multifamily Housing (Mid-Rise)	221	68 DU	370	18	12	30

As identified in the table above, the proposed development generates 370 daily and 30 PM peak hour trips.

4. TRIP DISTRIBUTION AND TRAFFIC ASSIGNMENT

Preliminary development trip distribution is based on existing traffic patterns, surrounding land uses, and engineering judgment. Trip distribution and resulting traffic assignment for the PM peak hour is illustrated in the attached Figure 2.

5. STUDY AREA

Based on FCC criteria, a TIS is required if a proposed development is anticipated to increase traffic volumes by 250 Average Daily Trips (ADT) or more, per the ITE *Trip Generation Manual*.

The FCC does not specifically identify volume thresholds triggering the need for specific intersection analysis. Rather materials indicate, *"The City shall require a Traffic Impact Study (TIS) as part of an application for development if... ... [there is] an intensification or change in land use that is estimated to increase traffic volume by 250 Average Daily Trips (ADT) or more, per the ITE Trip Generation Manual"* and that *"...a TIS is necessary where traffic safety, street capacity, future planned facility, or multimodal concerns may be associated with the proposed development."*

Based on development trip generation and distribution presented in this analysis, the following project area intersections are considered for evaluation.

TABLE 2 – PROJECT AREA INTERSECTIONS CONSIDERED FOR EVALUATION		
Intersection	Proposed PM Peak Hour Development Entering Trips	Percentage of Total Intersection Entering Traffic Volume (2010 Average Weekday)
Oregon Coast Highway (US 101) / 35th Street	18	1.05%
Oregon Coast Highway (US 101) / Munsel Lake Road	12	1.15%

As identified in the table above, the subject development accounts for approximately 1% of the entering traffic volume at the study intersections, and the resulting development impacts are so small as to be unmeasurable. It is further noted that daily traffic fluctuations at these same intersections typically range from 2-5%. As such, the subject development is found to have *de minimus* transportation system impacts and specific intersection analysis is not necessary.

6. PLANNED INFRASTRUCTURE IMPROVEMENTS

The Florence Transportation System Plan (TSP) indicates that both the US 101/35th Street and US 101/Munsel Lake Road intersections currently (as of 2010) operate at an acceptable level of mobility. The US 101/35th Street intersection is anticipated to operate acceptably throughout the 2035 planning period; however, US 101/Munsel Lake Road intersection operations are anticipated to exceed the mobility target.

Florence TSP materials state, *"The US 101/Munsel Lake Road intersection is a three-legged intersection with stop control on the minor street (Munsel Lake Road) approach. The minor street approaches are currently one lane only. The forecast heavy westbound left-turn demand from Munsel Lake Road experiences long delays in entering the US 101 traffic stream, and causes the critical westbound approach to operate over capacity."*

The TSP identifies two projects to address operating deficiencies, including:

- **Project PRJ-9 – US 101/Munsel Lake Road Intersection** – Install traffic signal when warranted. The project time frame is mid-term (2018-2025), and it is 50% SDC eligible. Considering ODOT mobility standards, the intersection is projected to operate unacceptably in 2035 without improvements. A traffic signal was also identified in the previous 2008 TSP.

- **Project PRJ-15 – US 101 Widening** – Widen US 101 to provide two northbound travel lanes from 42nd Street to Munsel Lake Road. The project time frame is long-term (2026-2035), and it is 0% SDC eligible.

Noting the proposed Shore Pines development is an allowed use in the H zone designation, the associated development traffic volumes have already been contemplated in the TSP. Additionally, the subject development does not contribute traffic to the critical westbound left-turn movement at the US 101/Munsel Lake Road intersection. Overall, specific intersection analysis is not necessary to identify additional transportation impacts.

7. SAFETY ANALYSIS

A review of the Florence TSP finds there are no identified safety deficiencies along US 101 in the project area. Further, there are no public intersections in the immediate US 101 property frontage area from mile points 188.41 to 188.44.

To evaluate current conditions, crash data for the US 101 roadway segment from 1/10 of a mile north of the property to 1/10 of a mile south of the property (mile points 188.31 – 188.54) was obtained from the Oregon Department of Transportation (ODOT) for six years from January 1, 2014 through December 31, 2019. Based on this data, there was only one crash which was located just north of the 37th Street intersection. A copy of the crash data is attached for reference.

Overall, there is a very low recorded crash incidence, i.e., 1 crash, on this roadway section; therefore, it is considered relatively safe and no further crash analysis is necessary.

8. PROPERTY ACCESS

Based on email communications with ODOT staff, the subject property (tax lot 500) does not have an existing highway approach to US 101, and the property frontage is access controlled. ODOT materials indicate tax lots 500, 600, 700, and the southern portion of 400 share a 45-foot-wide reservation of access located near mile point 188.44 adjacent to the tax lot 600 frontage at the southern edge of tax lot 500. At this location, there is an existing ODOT approach permit for a shared 32-foot-wide driveway, noting the existing paved driveway apron is only 12 feet wide.

While the applicant's site plan is preliminary, it is anticipated the proposed development access will be located within the existing reservation of access. The specific access location and design will be coordinated with both ODOT and the City and will meet applicable agency standards.

Overall, because the access is located on a straight roadway section with no documented safety deficiencies, it is anticipated the proposed access will operate safely and efficiently and will not necessitate additional transportation analysis or consideration of a right-turn deceleration lane.

9. SUMMARY

Materials presented in this letter are intended to provide sufficient information to allow the agencies to determine the TIS scope of work necessary to support the proposed development. Specific analysis methodologies are not identified in this letter; however, any necessary analyses will be performed consistent with agency requirements.

Following your review of this scope of work, please let us know of any necessary revisions or modifications so we can begin any necessary analysis.

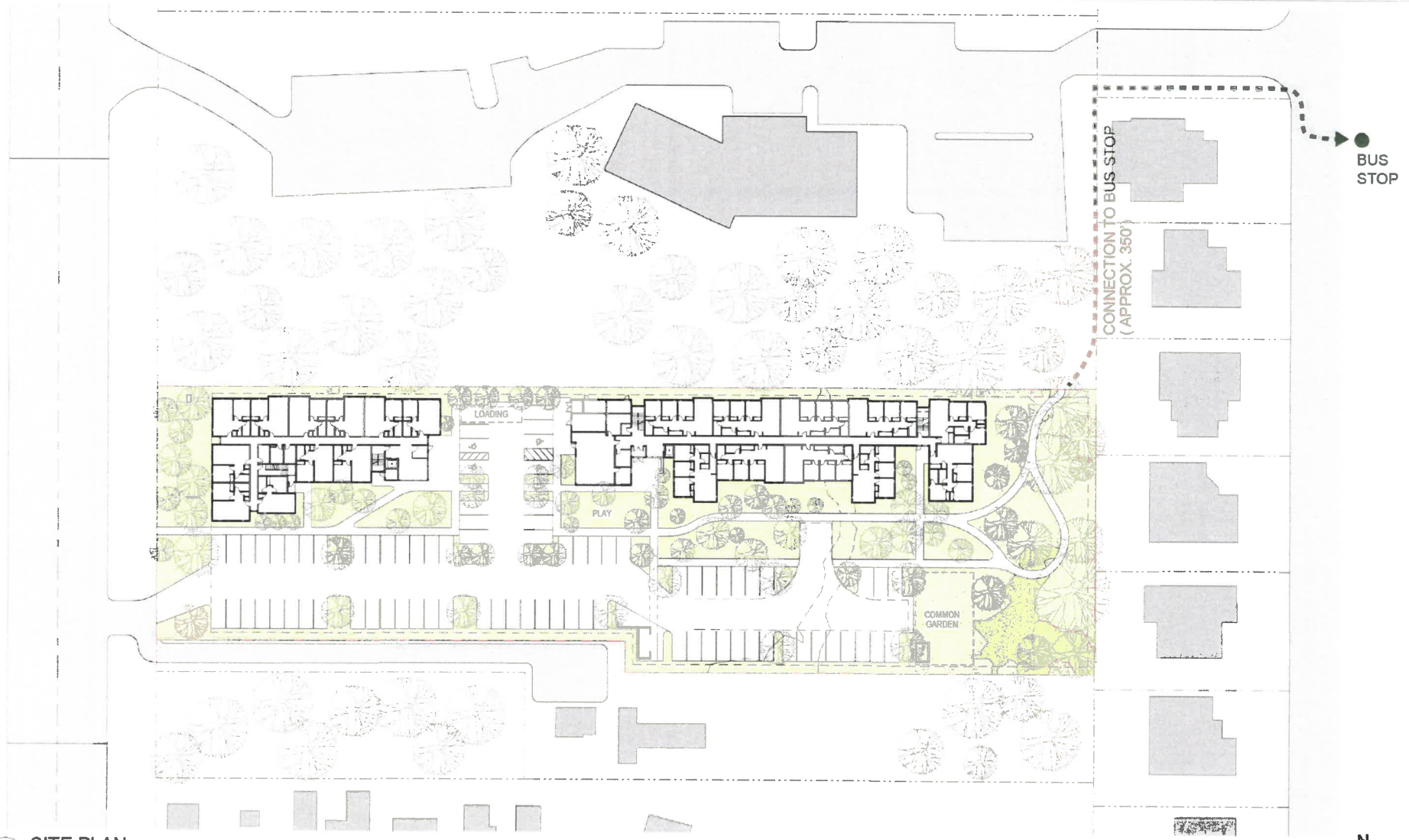
Sincerely,

Christopher M. Clemow, PE, PTOE
Transportation Engineer

REGISTERED PROFESSIONAL ENGINEER
18300 PE
OREGON
Jan. 16, 1996
CHRISTOPHER M CLEMOW
RENEWS 31 DEC 2021

Attachments: Preliminary/Draft Site Plan
Figures 1 and 2 – Study Area and Trip Distribution and Traffic Assignment
Crash Data

c: Desi Bellamy, Northwest Housing Alternatives



1 SITE PLAN
SCALE : 1" = 60'-0"

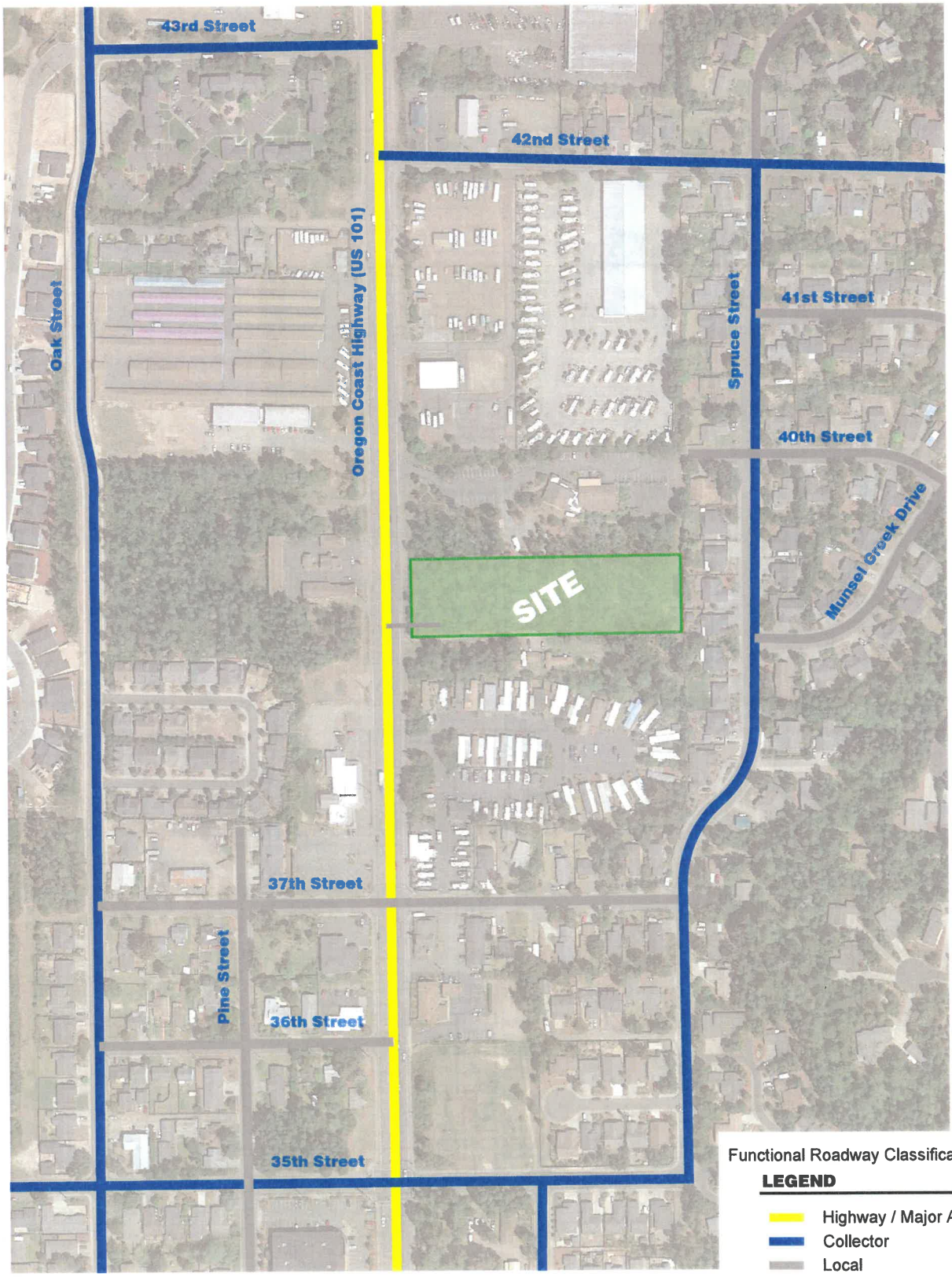
SHORE PINES HOUSING
TAX LOT 500 PARCEL, HIGHWAY 101 AT 40TH ST.
FLORENCE, OR 97439

NORTHWEST HOUSING ALTERNATIVES, INC
2316 WILLARD STREET
MILWAUKIE, OR 97222

D A O ARCHITECTURE LLC
310 SW 4TH AVE, SUITE 810
PORTLAND, OR 97204

ISSUANCE: TRAFFIC IMPACT/PARKING STUDY
DATE: 01/27/21
SCALE: 1" = 60'-0" (IF PRINTED ON 11x17 PAPER)

SK-1.0



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cclemow@clemow-associates.com

SITE AREA

Shore Pines - Florence, Oregon

C&A Project No. 20201006.00

FIGURE 1

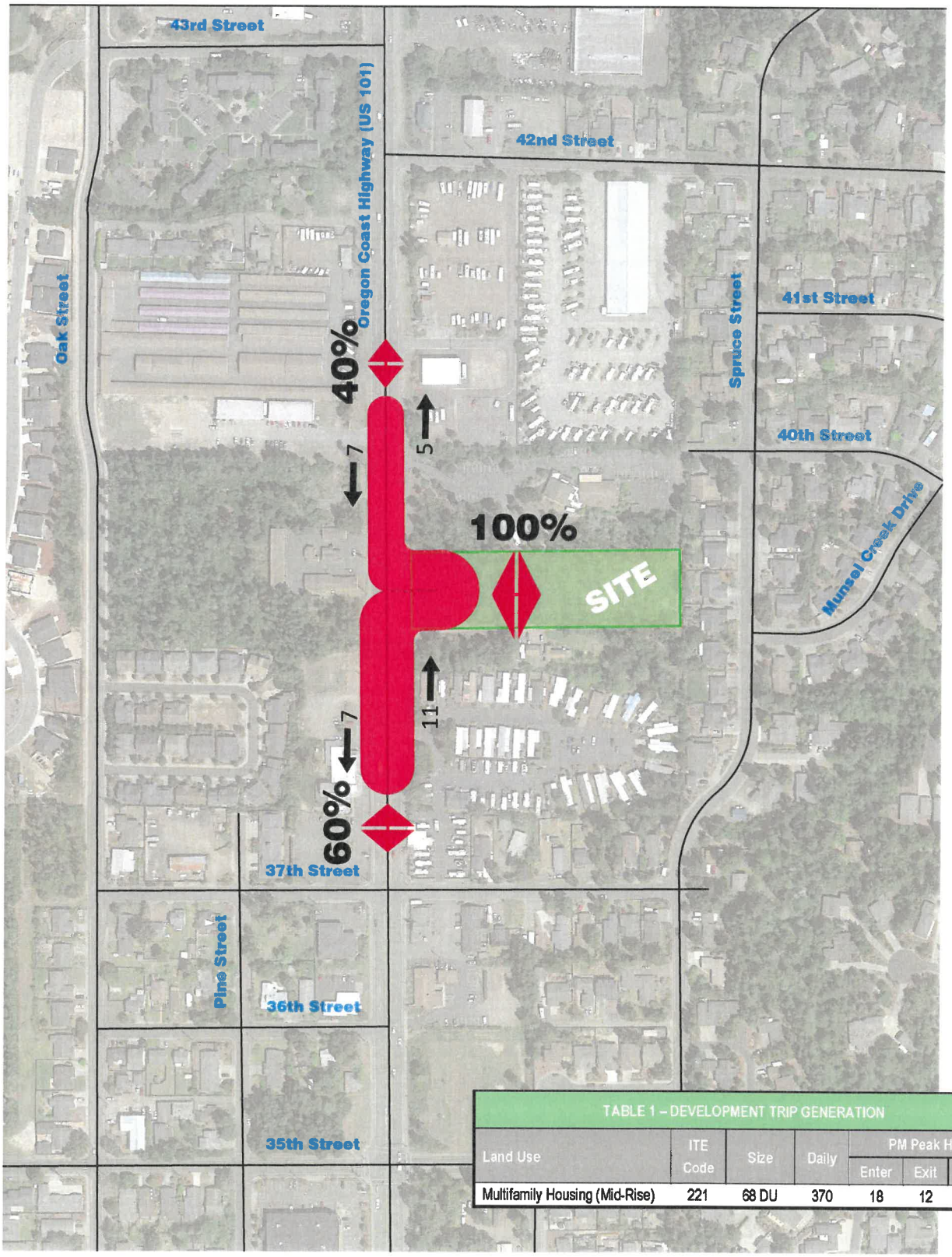

TABLE 1 – DEVELOPMENT TRIP GENERATION

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TRIP DISTRIBUTION and TRAFFIC ASSIGNMENT (PM Peak Hour)

Shore Pines - Florence, Oregon

C&A Project No. 20201006.00

FIGURE 2

CDS380
01/04/2021

OREGON DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANAYLYSIS AND REPORTING UNIT
CONTINUOUS SYSTEM CRASH LISTING

009: OREGON COAST

Highway 009 ALL ROAD TYPES, MP 188.31 to 188.54 01/01/2014 to 12/31/2019, Both Add and Non-Add mileage

1 - 1 of 1 Crash records shown.

SER# / INVEST / RD DPT / UNLOC?	S P E D C	D R E L	M A U G	J S I N	S C H	W O R K	DATE / DAY / TIME / LAT	COUNTY / CITY / URBAN AREA / LONG	RD# FC / COMPNT / MLG TYP / MILEPNT	CONN# / FIRST STREET / SECOND STREET / LRS	RD CHAR / DIRECT / LOCTN	INT-TYPE (MEDIAN) / LEGS (#LANES)	INT-REL / TRAF- / CONTL	OFFRD / RNDBT / DRVWY	WTHR / SURF / LIGHT	CRASH / COLL / SVRTY	V#	SPCL USE / TRLR QTY / OWNER / TYPE	MOVE / FROM / TO	P#	PRTC TYPE	INJ SVRTY	A G E	S E X	LICNS RES	PED LOC	ERROR	ACT	EVENT	CAUSE
04230	N	N	N	N	N	N	11/30/2015	LANE	1 14		STRGHT		N	N	CLR	S-STRGHT	01	NONE 0	STRGHT											06
NONE							MO	FLORENCE	MN 0	OREGON COAST HY	N	(NONE)	NONE	N	DRY	SS-O		PRVTE	S -N									000		00
N							2P	FLORENCE UA	188.53	37TH ST	06			N	DAY	PDO		PSNGR CAR		01	DRVR	NONE	77	M	OR-Y		032,082	000		06
N							43 59 56.57	-124 6 5.29		000900100S00		(04)													OR>25				
																	02	NONE 0	STRGHT											
																		PRVTE	S -N									000		00
																		PSNGR CAR		01	DRVR	NONE	65	M	OR-Y		000	000		00
																									OR<25				