Exhibit J – Traffic Impact Study

Department of Community Services Transportation Division

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MEMORANDUM

TO: Multnomah County Land Use Planning

FROM: Multnomah County Transportation Division

DATE: January 11, 2021; revised March 12, 2021

ADDRESS: 12424 NW Springville Road (R324300)

SUBJECT: Truck hauling plan for agricultural fill permit - transportation impact review

This memo consists of reviewing the proposed truck hauling plan for a transportation impact, in relation to an agricultural fill permit application. The subject property is located at 12424 NW Springville Rd, which is under the jurisdiction of Multnomah County and is functionally classified as a Rural Collector road.

On the following pages, all references to *Multnomah County Design and Construction Manual* (MCDCM) use the acronym "MCDCM" and all references to *Multnomah County Road Rules* (MCRR) use the acronym "MCRR".

SUMMARY OF STAFF FINDINGS (REVISED)

The applicant's truck hauling plan will result in a transportation impact if the number of new daily trips exceed 14 per day. This is the maximum number of trips allowed that will not exceed a 20% increase in total trips to the site (See MCRR Transportation Impact definition).

The 20% increase is based on peak season operations where there are currently 70 trips per day (see Table 1). Multnomah County Transportation Division used the maximum existing daily trips as that is a standard approach to trip generation rates.

It is assumed that the 14 additional trips per day will be applied to the existing daily trips as noted by the applicant, which results in the following maximums:

- In Fall/Winter the maximum existing daily trips is 35 (as provided by the applicant), with the additional allowance of 14 trips, the new total number of daily trips can be 49.
- In Spring/Summer the maximum existing daily trips is 70 (as provided by the applicant), with the additional allowance of 14 trips, the new total number of daily trips can be 84.

MCRR DEFINITIONS USED IN THE REVIEW (3.000)

Transportation Impact: The effect of any new construction or alteration which increases the number of trips generated by a site by more than 20 percent, by more than 100 trips per day or by more than 10 trips in the peak

hour shall be found to have a Transportation Impact. A minimum increase of 10 new trips per day is required to find a Transportation Impact.

Trip: A one-way vehicular movement. A vehicle entering a property and later existing that property has made two trips. "Trip" can also be applied to bicycle or pedestrian movements in the same way.

PROPOSAL AND SCOPE OF REVIEW

Land Use Planning requested the Transportation Division evaluate the proposed number of trips in the applicant's truck haul plan, according to the definitions within the MCRR to determine whether the proposed trips would cause a transportation impact. To determine new trips generated by a site, MCRR 5.100 clarifies calculations will be derived from the latest edition of the ITE's Trip Generation Manual (A) or a site development transportation impact study conducted by a professional engineer (B). However, as the Agricultural Fill Permit is a Type I permit, County Transportation requested the applicant provide an estimate of existing trips (Truck haul plan – review section below) in lieu of a formal, professional study, required by MCRR 5.100B. The estimates of existing trips provided by the applicant provided a baseline to calculate whether the proposed truck haul trips caused a transportation impact, according to the definition in MCRR 3.000 (see section on definitions below).

To clarify the scope of the findings presented in this memo:

- The review of transportation impact is based on the applicant's stated number of trips (existing and proposed). The findings are not based on a transportation impact study by a professional engineer.
- The tables have been revised and consolidated from the original memo (dated January 11, 2021) for clarity.
- The findings presented in this memo do not constitute the full scope of a "Transportation Planning Review" conducted by County Transportation, as this was not requested by either the applicant or Land Use Planning.

TRUCK HAUL PLAN - REVIEW

The applicant's Truck Haul Plan stated: "Daily number of fill haul truck trips: 20-30 (min-max)." As noted in the Scope of the Review section above, County Transportation could not determine whether there would be a transportation impact based on this information alone. At the request of County Transportation, the applicant provided the following estimate of existing trips to the land use planner via email:

Hard to calculate existing trips to the farm because I do not count them. But we have seven people working on the farm each day that drive. I would say each person on average during fall and winter makes about 4 to 5 trips a day. My estimate on existing trips in fall and winter would be 28 to 35 trips. In spring and summer I think the trips would double to 56 to 70 trips per day. The trip count will be higher once we start delivering to homes in about a year.

According to the three qualifying criteria to determine whether there is a transportation impact, the applicant's proposed fill haul truck trips:

- generates an increase in daily trips by more than 20%. *Under the applicant's truck haul plan, there is a transportation impact.* See table 1 for the calculations, and discussion, below;
- are 100 trips per day or lower, for both the applicant's stated minimum (20) and maximum (30). For this qualifying criterion, the proposal does not generate a transportation impact.
- includes no peak hour trips. For this qualifying criterion, the proposal does not generate a transportation impact.

Table 1, below, shows the number of new trips that would constitute a twenty percent (20%) increase of trips between the applicant's lower and upper existing site traffic estimates. The applicant's truck haul plan proposes 20 (low) or 30 (high) new daily trips. As shown in table 1 (% change), no matter which range is used, the number of new trips generated at the site under the applicant's truck haul plan would exceed the 20% threshold, thus generating a transportation impact (MCRR 3.000). The applicant's proposed daily trips provided in the truck haul plan would generate a transportation impact.

TABLE 1 Number of new trips that constitute a twenty percent (20%) increase of trips between the applicant's existing daily trips (low and high per season).

Season (trip range no.)	Existing daily trips	New daily trips (no.) required for a 20% increase
Fall-Winter (low)	28	5.6
Fall-Winter (high)	35	7
Spring-Summer (low)	56	11.2
Spring-Summer (high)	70	14

In accordance with the 20% thresholds set out in Table 1, new daily trips will need to be limited to no more than fourteen (14) total new trips per day in order to avoid generating a transportation impact, according to the season with the highest existing daily trips (Spring-Summer). Limiting new trips to no more than fourteen (14) trips per day avoids a transportation impact. Multnomah County Transportation Division used the maximum existing daily trips as that is a standard approach to trip generation rates.

This revises the findings set out in the previous memo. The previous findings stated that the previous recommendation of "no more than 8 trips per day" would be lower than the "minimum increase of 10 new trips per day….to find a transportation impact" stated in the MCRR 3.000 transportation impact definition. The revised findings take into account the Spring-Summer scenario with higher existing trip estimates and generating a 20% threshold number (14) greater than 10, as set out in the bottom row of table 1.