Department of Community Services
Transportation Division
http://multco.us/transportation-planning

1620 SE 190th Avenue, Portland, Oregon 97233-5910 • Phone (503) 988-5050

M E M O R A N D U M

TO	Bonita Oswald, Portland Water Bureau
FROM	Graham Martin, Senior Planner, Transportation Planning & Development
DATE	April 28, 2022
ADDRESS	SE Carpenter Lane (across from 35319 SE Carpenter Lane). Gresham, OR R994220980, R994220820
SUBJECT	PA-2022-15566 PWB Bull Run Filtration Project - Transportation comments

Multnomah County Transportation Planning and Development has reviewed the above referenced transportation review request and provides the following comments.

The comments provided in this memorandum are based on the pre-application request information submitted to Multnomah County. While every effort has been made to identify all related standards and issues, additional issues may arise and other standards not listed may become applicable as more information becomes available.

Portland Water Bureau proposes to build a drinking water filtration facility and communications tower located on SE Carpenter Lane with raw and finished water pipelines connecting to the existing Bull Run conduit system. Accesses to the SE Carpenter Ln site are proposed on SE Carpenter Ln, as well as emergency access to/from the south of the site from Clackamas County. SE Carpenter Ln is a road within Multnomah County jurisdiction, classified as a Rural Local 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". Numbers correspond to the relevant sections within the MCRR or MCDCM.

SUMMARY OF REQUIREMENTS

1. **Submit a Transportation Impact Study (TIS) to County Transportation (row.permits@multco.us) for review [MCRR 4.100 A-B; MCRR 5.100 B; MCRR 7.100]:**
    a. Include access analysis [MCRR 4.100B], as well traffic analyses for the 13 intersections indicated in Figure 11 of the Pre-app request packet;
    b. Include a section (or sections) in the Transportation Impact Study (TIS) that demonstrate options considered and the rationale for mitigating any identified transportation impacts within the Proposed Conditional Use study area identified in Figure 12;
    c. Provide descriptions, plans, etc., of any mitigation measures identified/proposed as part of alleviating any identified transportation impacts.

2. **Submit a Road Rules Variance application [MCRR 16.100 A, C] for the following criteria:**
    a. MCRR 16.200 A-D. Adequate descriptions/rationales must be provided for all criteria in this section.
    b. MCRR 16.225 A - Multiple Access Points. Explain the requirements for more than one access, as this exceeds the County Transportation standard of one access per subject property (MCRR 4.200).
    c. MCRR 16.300 A-L. Please respond to each of the criteria in this section. Include a copy of the Fire Service Agency form/letter in conjunction with the submitted variance documents and criterion J.

   Forms can be requested from County Transportation at row.permits@multco.us
3. **Submit a copy of the Stormwater Certificate and report(s) to County Transportation for review [MCRR 26.000].**
4. **Transportation Fees required to be paid:**
    a. Transportation planning review: $500
    b. Stormwater certificate review: $200
    c. TIS review: $200
    d. Road Rules Variance: $1200 (notice fee waived, as this will be combined with the Land Use notice(s).
5. **Additional Transportation Permits will be required following any Land Use and Road Rules Variance approvals.** Additional Transportation permits include Construction Permits (MCRR 9.200; MCRR 18.200), Right of Way Encroachment Permits (MCRR 18.250), and Utility Right of Way Permits (MCRR 18.275).

APPLICATION REQUIREMENTS

Per MCRR 4.100 A-D, submit the following information:

A. Traffic Study-completed by a registered traffic engineer;	Include in Transportation Impact Study
B. Access Analysis-completed by a registered traffic engineer;	Include access analysis, as well traffic analyses for the 13 intersections indicated in Figure 11 of the Pre-app request packet in the TIS.
C. Sight Distance Certification from a registered traffic engineer; and	Sight Distance is likely to be sufficient for an access on SE Carpenter Ln. Applicant may wish to submit information to verify sufficient sight distance to County Transportation for review. Should any other accesses be proposed, such as renewed interest in alternative locations such as SE Dodge Park Blvd, this will likely require stopping sight distance analyses.
D. Other site-specific information requested by the County Engineer including a survey.	Provide site plans, surveys and any relevant accompanying information to County Transportation as part of the Road Rules Variance application. It is

	within the County Engineer's authority to request additional information, where appropriate to ensure the safety and integrity of the County Transportation system.

The applicant/applicant's consultant requested an initial Transportation Planning Review to help identify applicable Transportation requirements and review criteria. At the time, the project was exploring different options for providing driveways/access to the site. A memo (ref: EP-2020-14000) was issued summarizing Transportation's initial review per the MCRR and MCDCM. A table comparing the initial findings of that review and the information included in the Pre-Application Request Packet are provided in the following table; a copy of the EP-2020-14000 memo is appended to this memo.

Transportation Criteria	**EP-2020-14000 memo summary**	**Pre-app requirement**
MCRR 4.200 No. of Accesses	More than one access to the site is being proposed (Dodge Park, SE Carpenter Ln, and to south into Clackamas County).	More than one access to the site is still requested (SE Carpenter Ln, western easement and maintenance gate; and southern emergency access into/from Clackamas County). **Road Rules Variance still required.**
MCRR 4.300. Location	Memo set out spacing standards for a proposed access on SE Dodge Park Blvd and SE Carpenter Ln.	Access spacing standards do not apply if access is only being requested on rural local roads (SE Carpenter Ln). A Road Rules Variance will be required if access is sought from a higher road classification.
MCRR 4.400 Width.	County Standard for commercial access widths is 20-35 feet.	20-35 feet requirements remain. Road Rules Variance required if below/above the width standard.
MCRR 4.500 Sight Distance	Memo set out sight distance standards for a proposed access on SE Dodge Park Blvd and SE Carpenter Ln.	Access on SE Carpenter Ln is likely to meet sight distance requirements. Applicant may wish to provide evidence.
MCRR 5.100 Transportation Impact	Applicant informed TIS would be required to establish no. of trips.	Per 4.100 A-B, submit TIS, including the intersections previously accepted by Transportation.
MCRR 6.100 A ROW Dedication requirement	Carpenter Ln has a 50-feet minimum ROW width; it is currently between 30-and 50 feet wide, depending on the section of road.	A ROW dedication is likely to be required, based on the TIS identifying a transportation impact.
MCRR 6.100 B Frontage Improvements	-	Frontage Improvements that may be required, based on the TIS include: 1. Street widening/improvement 2. Drainage facilities
MCRR 8.000 Off-site	-	Depending on the proposed development submitted

Transportation Criteria	EP-2020-14000 memo summary	Pre-app requirement
improvements		in the Land Use application(s), the applicant may be required to meet Off-Site Improvements in conjunction with MCRR 6.100 B frontage improvements. These would be proportionate to the transportation impact being generated by the proposal. MCRR 8.100 A (3) may apply.
MCRR 9.200 Construction Permit		Improvements to the Right of Way, including those required under MCRR 6.100 B and 8.000, will likely require a construction permit.
MCRR 14.000 Vacation of Right-of-Way		Any proposed, or required, vacations of right-of way must be undertaken pursuant to MCRR 14.000.
MCRR 16.000 Road Rules Variance	The memo identified the various proposed access scenarios that would require a Road Rules Variance application; currently the County Access Standards are not/cannot be met.	As noted above, the SE Carpenter Ln site has more than one access, exceeding the County Transportation Standard. A Road Rules Variance application is required.
MCRR 18.250 ROW/Encroachment (access) Permit		The new access may also require a ROW permit per MCRR 18.250, in addition to a Construction Permit (MCRR 9.200; MCRR 18.200). A ROW access permit is likely to be required for the additional Intertie Vault facility location, if no permit is recorded on file.
MCRR 26.000 Stormwater Review	All developments with increases of impervious surface areas by more than 500 sq ft must obtain a stormwater certificate and report submitted to Transportation for review.	All developments with increases of impervious surface areas by more than 500 sq ft must obtain a stormwater certificate and report, and submit it to Transportation for review.
33604 SE Lusted Rd Intertie Facility	Not included in the information for EP-2020-14000.	An access permit may be required (see MCRR 18.250 above). Stormwater certificate and report to be reviewed (MCRR 26.000).

Specific Question Number 3

Provided as Figure 11 are the proposed intersections for the project Transportation Impact Study. We have included intersections based on input from our transportation engineer as well as public comments. Please confirm if there are any additional intersections that the County would like to have included in the Transportation Impact Study.

Figure 11 increases the proposed number of intersections to be included in the Transportation Impact Study (TIS) to 13 intersections. Transportation notes that Figure 11 includes the seven intersections previously identified and accepted for inclusion in the TIS . Transportation does not require additional intersections to be included, other than the 13 proposed.

Specific Question Number 8

Please confirm that our proposed Conditional Use study area shown in Figure 12 is reasonable. This area is designed to be large enough to include all roads/intersections studied in the Transportation Impact Study and to ensure that nursery crop land and related wholesale operations are considered in the various impact analyses.

County Transportation considers the area identified in Figure 12 sufficient for inclusion in the TIS.

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M E M O R A N D U M

TO: Alex Pichacz, Winterbrook Planning

CC: Jessica Berry, Transportation Planning and Development Manager
Adam Barber, Deputy Land Use Director
Tim Brooks, Winterbrook Planning

FROM: Graham Martin, Transportation Planner

DATE: November 23, 2020

SUBJECT: **EP-2020-14000, Carpenter Ln. Portland Water Bureau filtration facility R342603; R342006; R342619**

Multnomah County Transportation Planning and Development has reviewed the above referenced transportation planning review request and provides the following comments.

While every effort has been made to identify all related standards and issues, additional issues may arise and other standards not listed may become applicable as more information becomes available. 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

1. **The applicant should submit trip generation information for the proposed development to the County's transportation division for review, to determine if there is a transportation impact.**
2. **As the site's access(es) do not currently meet County Standards, the standard procedure would be to a) propose accesses that meet County Standards or b) apply for a Road Rules Variance.**
3. **Acquire ROW permits for the site's access(es) onto Dodge Park Blvd/SE Carpenter Ln.** <u>This will be conditioned as part of the Road Rules Variance; it does not need to be submitted at the time of the RRV application.</u>
4. **The County must review any alteration of the existing storm water drainage for impacts to County right of way.**

TRANSPORTATION IMPACT

A transportation impact is defined in Multnomah County Road Rules (MCRR) 3.000 as 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. A minimum increase of 10 new trips per day is required to find a transportation impact.

The applicant should submit trip generation information for the proposed development to the County's transportation division for review, to determine if there is a transportation impact.

ACCESS MANAGEMENT

The submitted plan indicates three (or four) access points:

1. SE Dodge Park Blvd. There is a permitted ROW access for the parcel onto SE Carpenter Ln. However, the proposed plan indicates that an access will be created onto Dodge Park Blvd which is a rural collector. As this is a higher classification road than SE Carpenter Ln (rural local), a road rules variance application will be needed (see below). A summary of the County's review of the proposed access according to its standards set out in the table 1 below.
2. SE Carpenter Ln. No dimensions or sizes are shown for parcel RR342619. To be confirmed. See access standards in table 2 below.
3. SE Bluff Rd (Clackamas County) to the south of the parcels. Currently, the plan shows no points of this access will be within Multnomah County jurisdiction. The applicant should defer to Clackamas County for comment. However, while Multnomah County has no jurisdiction over the proposed easement and access points on SE Bluff Rd, if there is an access point created within a parcel within Multnomah County's jurisdiction this will need to be permitted. The easement will need to be provided along with the ROW access application for Transportation Division review.

Table 1: SE Dodge Park Blvd access				
Property address	35227 SE Dodge Park Blvd access			
Property ID	R342606			
Road Classification	Rural Collector			
MCRR/DCM ROW Requirements	**Feet**	**Existing/ Proposed Feet**	**Standard Met (Yes/No)**	**Additional requirements**
No. of access points	-	Existing 1; proposed 2.	No	If the parcel has an access from Dodge Park Blvd and then another onto SE Carpenter Ln, standard not met. Meet standard or apply for Road Rules Variance (see below)
ROW width	80	98	Yes	N/A
Driveway spacing	150	180 to west; 318 to east	No	N/A

Driveway width (commercial/agricultural)	20-35	?	?	Meet standard or apply for Road Rules Variance (see below)
Stopping sight distance (55 mph)	495	>495 to west >495 to east	West - yes East - yes	Demonstrate that the standard is met by providing a sight-distance analysis for the access onto SE Dodge park Blvd and SE Carpenter Ln. If standard cannot be met, apply for Road Rules Variance (see below).
Paved approach	20	20	Yes*	*Meeting the standard will be required for ROW access permit. (see below)
Right-of-way Dedication	N/A	N/A	N/A	See Table 2 for SE Carpenter Ln access.

Table 2: SE Carpenter Ln accesses				
Property address/ID	Carpenter Ln - R342606 (south access); R342619 (north access - tbc)			
Property ID	R342619; R342606			
Road Classification	Rural Local			
MCRR/DCM ROW Requirements	**Feet**	**Existing/ Proposed Feet**	**Standard Met (Yes/No)**	**Additional requirements**
No. of access points	-	Existing 1; proposed 2.	No	If the parcel has an access from Dodge Park Blvd and then another onto SE Carpenter Ln, standard not met. Meet standard or apply for Road Rules Variance (see below)
ROW width	60 (50 min)	30	No	10-15 feet per parcel (north and south) dedication to meet the ROW standard may be required.
Driveway spacing	N/A	N/A	N/A	N/A
Driveway width (commercial/agricultural)	20-35	?	?	Meet standard or apply for Road Rules Variance (see below)
Stopping sight distance (25 mph)	155	>155 to west >155 to east	West - yes East - yes	Demonstrate that the standard is met by providing a sight-distance analysis for the access onto SE Dodge park Blvd and SE Carpenter Ln. If standard cannot be met, apply for Road Rules Variance (see below).
Paved approach	20	20	Yes*	*Meeting the standard will be required for ROW access permit. (see below)

Right-of-way Dedication			Yes*	Dedication may be required to meet standard. This can be included as a condition of an approved road rules variance.

ROW Access Permit

All access points to County right-of-way must be permitted [MCRR 18.250]. If the applicant can provide proof of Right-of-Way sign-off on prior building permit or land use application, the access permit application fee is waived. **Please acquire an access permit for the site's access(es) onto Dodge Park Blvd/SE Carpenter Ln.** This will be conditioned as part of the Road Rules Variance; it does not need to be submitted at the time of the RRV application.

In general, to satisfy this requirement applicants must submit an access permit application with a description of the driveway width and type (i.e. gravel or paved). Applicants must also submit an 11" x 17" site plan showing house, driveway, and road. For further information please visit Driveway Permits: https://multco.us/drivewaypermit

MULTNOMAH COUNTY ROAD RULES VARIANCE

As noted in the table above, it appears that a road rules variance may be required for the following criteria:

- MCRR 4.200 - two to four access points (R342606); to be confirmed for R342619 (depends on access from Clackamas County).
- MCRR 4.300 - access spacing on SE Dodge Park Blvd
- MCRR 4.400 - driveway/ROW width onto Dodge Park Blvd and SE Carpenter Ln (to be confirmed)

Multnomah County Road Rules provides for a variance from County standards and requirements when written documentation substantiates that the requested variance is in keeping with the intent and purpose of County Code and adopted rules, and the requested variance will not adversely affect the intended function of the County road system or related facilities. A variance approval may include mitigation measures as condition of approval. [MCRR 16.000]

All requests for a variance to these Road Rules that are part of a development that requires approval of that development as a "land use decision" or "limited land use decision", as defined by ORS 197.015, shall be submitted at the time that application for the land use review is submitted to the applicable planning office having land use jurisdiction. The County Engineer's decision on the variance to these Road Rules shall not become effective until the date that the associated land use decision becomes effective.

In order to be granted a variance, in addition to the criteria set out in MCRR 16.300, the applicant must demonstrate that:

MCRR General Variance Criteria [MCRR 16.200]

- **A.** Special circumstances or conditions apply to the property or intended use that do not apply to other property in the same area. The circumstances or conditions may relate to the size, shape, natural features and topography of the property or the location or size of physical improvements on the site or the nature of the use compared to surrounding uses;
- **B.** The variance is necessary for the preservation and enjoyment of a substantial property right of the applicant and extraordinary hardship would result from strict compliance with the standards;
- **C.** The authorization of the variance will not be materially detrimental to the public welfare or injurious to other property in the vicinity, or adversely affect the appropriate development of adjoining properties;
- **D.** The circumstances of any hardship are not of the applicant's making.

Please submit written responses to MCRR 16.200 and 16.300 as part of your application. See word document included with the email. If the application has more than one access, please also respond to MCRR 16.225 A-C. Please provide as much explanation, and supporting evidence as you can, to enable us to review the circumstances/rationale for your variance.

Please also include the local Fire Service Agency review (signed form or letter) to accompany the application. Many applicants overlook this requirement (see 16.300 J).

Stormwater Management

Multnomah County Transportation requires any stormwater feeding into the public ROW to be built to a 25-year storm event (Multnomah County Road Rules, 26.300, Stormwater Discharge permit requirements; Multnomah County Design and Construction Manual, 5.1.2 Water Quantity Design Standards).

Therefore, the County must review any alteration of the existing storm water drainage for impacts to County right of way. Increased run-off to County right of way could negatively impact the County's roadways and stormwater system. Therefore, on-site management of stormwater is a priority for the County. (MCRR 26.100). The County currently refers to the Portland Stormwater Manual methodology as a guideline but may have additional requirements depending on site conditions.

Portland Stormwater Management Manual can be found on their website:
Stormwater Management Manual: https://www.portlandoregon.gov/bes/64040
Appendix D: https://www.portlandoregon.gov/bes/64050
Simplified Approach submittal guide: https://www.portlandoregon.gov/bes/article/474163
Presumptive Approach submittal guide: https://www.portlandoregon.gov/bes/article/474170

Please note that should further information or plans indicate that the submitted documents have been superseded, the County may contact the applicant to provide additional submissions.