



Kevin COOK <kevin.c.cook@multco.us>

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## Request for additional information (Transportation) - Multnomah County Land Use Case File No. T3-2017-9165 (EP-2017-6780)

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Katherine McQUILLAN <katherine.mcquillan@multco.us>

Mon, Mar 19, 2018 at 9:21 AM

To: gary.shepherd@oregonmetro.gov, karen.vitkay@oregonmetro.gov

Cc: Joanna VALENCIA <joanna.valencia@multco.us>, Kevin COOK <kevin.c.cook@multco.us>, Michael CERBONE <michael.cerbone@multco.us>, Katherine THOMAS <katherine.thomas@multco.us>, Courtney LORDS <courtney.lords@multco.us>

Gary and Karen,

Multnomah County Transportation requests additional information regarding the T3-2017-9165 Land Use Application for the Burlington Creek Forest Nature Park. As of this time, the County cannot determine the transportation impact of the proposed development. Without understanding the transportation impact, County Transportation cannot support the land use application.

Attached is a memo outlining requests for additional information after both planning and engineering staff reviewed the submitted application materials (dated January 2018). Please don't hesitate to get in contact with me for any clarifications related to the memo. I can coordinate a meeting with our engineering staff and your traffic consultant for the more technical clarifications.

Thank you,

Kate McQuillan

**Kate McQuillan, AICP**  
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*Preferred pronouns: (she / her / hers)*

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**Multco Transp Comments\_T3-2017-9165\_EP-2017-6780.pdf**  
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TO: Gary Shepherd, Office of Metro Attorney, Applicant  
Karen Vitkay, Metro Parks and Nature, Applicant

CC: Kevin Cook, Senior Planner, Land Use Planning, Multnomah County  
Joanna Valencia, Planning and Development Manager, Multnomah County  
Storm Beck, Engineer, Multnomah County  
Riad Alharithi, Road Services Engineering Manager, Multnomah County

FROM: Kate McQuillan, Transportation Planner, Multnomah County

DATE: March 14, 2018

SUBJECT: Request for additional information for EP-2017-6780, Site Development at Burlington Creek Forest (Land Use Case File No. T3-2017-9165)

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Multnomah County Transportation Planning and Development program (hereafter, "County") reviewed the re-submitted application materials for County Land Use File T3-2017-9165<sup>1</sup>, dated January 3, 2018 when the applicant deemed the application complete. Metro is proposing site development for a public nature park at the Burlington Creek Forest including roadway safety improvements, vehicle parking, restroom, trails and amenities for public access.

The County has reviewed the submitted application materials, per the Multnomah County Road Rules (Section 5.000) to determine the transportation impact caused by the proposed development. The County is unable to determine the transportation impact at this time. The County requests additional information from the applicant to help determine the transportation impact of the proposal. Without additional information, the County does not have sufficient information to recommend approval of the land use application.

1. Confirm number of access points (both motorized and non-motorized)

The application material narrative and accompanying maps imply only one formal access point to the

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<sup>1</sup> Note the County received a concurrent land use application from Metro proposing a Comprehensive Plan Amendment to adopt the North Tualatin Mountains Access Master Plan. This memo provides comments related to Case File No. T3-2017-9165.

Burlington Creek Forest Nature Park which is the existing gravel forest access road off of NW McNamee Road. Metro proposes to improve the existing forest access road such that vehicles can access the future parking lot and visitor facilities. The County requests Metro clarify whether or not additional access points exist for the 18 parcels identified in the T3 application including formal and informal accesses, for motorized and non-motorized users, and any potential public road crossings. Additionally, access for operations should also be identified (i.e. employee and emergency access points). Multnomah County is primarily concerned with the safety of the public visiting the future park.

2. Definition of “public road” and Applicant’s response to approval criteria §33.4570(B)(2)

In response to the named approval criteria above, the Applicant notes that the proposed parking lot is further than the required 200-feet from NW McNamee Road. The applicant invokes a definition of “public road” from a previous Multnomah County land use decision from 2015 (T3-2015-3903) to argue that the forest practice road connecting the parking lot to NW McNamee Road meets the definition of public road. County does not accept that the definition of public road as described in the 2015 final decision as it relates to the Burlington Creek Forest Nature Park application. Unlike the access road in the 2015 land use decision which had a history of being a County-owned and maintained road documented in public record, the forest access road has only a history of being a private access. Additionally, the County adheres to the definition of “public road” as defined in ORS 368.001. The nature of the private access is documented in public record through two Multnomah County access permits: ROW Permit # 70742 issued October 2013 to the Burlington Water District, and ROW Permit #90-0709 issued February 1990 to Hampton Tree Farms.

The County requests that the applicant revise the response to approval criteria §33.4570(B)(2) to reflect the designation.

3. Revise transportation analysis

The County has reviewed the submitted land use application. Please revise and resubmit your transportation analysis per our comments below.

*Trip generation information*

- a. Provide a discussion comparing the Institute of Traffic Engineers (ITE) Trip Generation Manual’s trip rates for County Parks and Regional Parks with Metro’s methodology averaging trip data from two existing Metro Nature Parks. It is not clear what are the assumptions for a “County Park”, “Regional Park” or “Nature Park”; nor is it clear how the proposed Burlington Creek Forest Nature Park fits within these assumptions.

- b. Please address the following statement from the Newell Creek Canyon Natural Area Transportation Analysis Letter (which was submitted as an Exhibit to the Burlington Creek Nature Park application): "...[G]iven the existing limited availability of trails for beginning mountain bicycling in the Metro area, [Newell Creek Canyon Nature Park] is predicted to have some regional draw.". Please address how this regional draw will impact the Burlington Creek Forest Nature Park with specific data and projections related to anticipated traffic; e.g. trips per day, trips per day during the week versus weekend, etc.?
- c. Please provide current and anticipated trips to the Ancient Forest Preserve, adjacent to the southeast boundary of the Burlington Creek Forest. Materials included with the "North Tualatin Mountains Access Master Plan" state that the Ancient Forest Preserve owned and maintained by the Forest Park Conservancy would be accessed from the Burlington Creek Forest day use area. Please also include these trips in the total projected number of trips to the improvements expected from the T3 land use application for site improvements at Burlington Creek Forest.
- d. Please clarify the timeline for when the adjacent quarry operations are completed and when the Forest Park Conservancy plans to establish a trail connection on the quarry property between Ennis Creek Forest and the Burlington Creek Forest. The "North Tualatin Mountains Access Master Plan" notes that a future trail will connect Burlington Creek Forest and Ennis Creek Forest, but that Metro does not plan to develop parking facilities at the Ennis Creek site. The County is concerned that if quarry operations cease and the trail between the two sites is established within the next ten or so years, that users who wish to access the Ennis Creek Forest site will utilize the provided parking at Burlington Creek Forest Nature Park. Please address any anticipated users travelling to the Burlington Creek Forest site to get to the Ennis Creek site that may not be accounted for in the submitted methodology.

#### *Crash data*

- e. Please pull all crash data from 2007 to 2015 from one data source, and resubmit the safety analysis. In the applicant's Transportation Analysis Letter, crash data for five identified intersections near the Burlington Creek Forest site from 2007 to 2013 was pulled from the County's Transportation System Plan (TSP) whereas the data from 2013 to 2015 was pulled by the engineering firm who developed the letter. Presumably both data sets are sourced from Oregon Department of Transportation's Crash Analysis and

Reporting Unit Records; however it's not clear if the two data sets were filtered and analyzed in a consistent manner. For more accurate and consistent data, the County requires the applicant pull all crash data for the years 2007-2015 from a single source and not via a County document. Please include references in the resubmittal, so the source is clear. The County also requires the applicant reanalyze the data to ensure all potential safety concerns are addressed.

#### *Level of service analysis*

- a. Please conduct a full Level of Service (LOS) analysis to address the current and future capacity needs for the five intersections identified below and from memo dated March 28, 2017 from the County to inform the Pre-Application Meeting (PA-2017-7041). These intersections are:
  1. US 30 / NW McNamee Road
  2. NW McNamee Road / Project Site Access
  3. NW McNamee Road / NW Skyline Boulevard
  4. NW Skyline Boulevard / NW Cornelius Pass Road
  5. US 30 / NW Cornelius Pass Road

The Transportation Analysis Letter provided a very general estimate of Level of Service using traffic projections from the County TSP document and site visits of each intersection. Also, the letter references information regarding how the growth rate was calculated as an attached exhibit, however that information is nowhere to be found. Please provide the referenced exhibit. Additionally, County engineering requires a traffic impact analysis of the five identified intersections to not only determine the future 2033 LOS of each intersection, but to also project from what direction the anticipated traffic will flow from (from Washington County to the west, or Portland area to the east). The County needs to understand what the worst-case scenario will be for traffic operations during peak travel times, which is assumed to be weekends from June through September.

- b. The Burlington Creek Forest site is located near both an Oregon Department of Transportation facility (US Highway 30, and soon NW Cornelius Pass Road) and a City of Portland intersection (NW McNamee Road and NW Skyline Blvd). Please check with each jurisdiction to ensure the analysis provided meets their respective requirements.

#### *Sight distance analysis*

- c. Please revise the sight distance analysis using preferred standards from the Multnomah

County Design and Construction Manual, which defers to the current AASHTO standards. AASHTO standards allows for engineering judgment in determining assumptions used for sight distance calculations. The County utilizes posted speed limits and a height object of 3.5-feet. The sight distance analysis submitted as Exhibit I in the Transportation Analysis Letter used the 85<sup>th</sup> percentile speed, and not the posted speed, to determine the minimum sight distance measurement. Additionally, the analysis uses a height object of 4.25-feet and not 3.5-feet. The applicant needs to revise the sight distance analysis using the posted speed (which in this instance is 55mph) and include any proposed mitigation to meet the standards to ensure the safest possible access to the Burlington Creek Forest Nature Park.

- d. The County also requests that the applicant include a sight distance analysis for a southwest travelling vehicle wanting to turn left to the proposed access of the Burlington Creek Forest Nature Park. The submitted Transportation Analysis Letter does not address the potential safety concerns for vehicles making this turning movement. Additionally, if there are any access points for operations and emergency access per our comment above, please provide that safe sight distance is available for these access points.
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Mon, Mar 19, 2018 at 4:27 PM

To: gary.shepherd@oregonmetro.gov, karen.vitkay@oregonmetro.gov

Bcc: kevin.c.cook@multco.us

Hi Gary

To follow up on your phone call this morning, here are some general code citations that are relevant to the memo:

### Multnomah County Code

- Multnomah County Code §29.500 Street Standards - Part 1: General Provisions - provides authority to regulate public right of way via the County Road Rules and our Design and Construction Manual
- Multnomah County Code §29.578 Rules for Right of Way Use - provides authority through the Road Rules and the Design and Construction Manual to regulate design factors and standards (and other subjects) for right of way use.

### Multnomah County Road Rules

- Multnomah County Road Rules, Section 5.000 Transportation Impact - Process for how a "transportation impact" is defined, and that County can require pro-rata share of improvements (or other requirements) as established in Section 6.000 of the Road Rules
- Multnomah County Road Rules, Section 7.000 Transportation Impact Study - Allows for County Engineer's discretion to require a Transportation Impact Study associated with land use proposal. Also preserves County Engineer's ability to scope the study (ie, what elements are required in the study).

### Multnomah County Design and Construction Manual

- DCM Section 1.1.3 Traffic Study Requirements (includes details for site-generated trip characteristics, and design level of service)
- DCM Section 1.2 Access Management - Provides standards for driveways
- DCM Section 2.4 Engineering Design Standards - Outline standards and procedures for various sight distance calculations

If you need me to be more specific about which of the above citations apply to the various requests in my memo, let me know. I'll need some time to squeeze that into my work load but would be happy to do so.

Kate

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