



February 7, 2014

Project #: 13588

Development Review Commission  
c/o Planning and Building Services Department  
City of Lake Oswego  
P.O. Box 369  
Lake Oswego, Oregon 97034

**RE: Block 137 Response to February 5<sup>th</sup> Transportation Comments (LU 13-0046)**

Dear Commission Members:

This letter responds to transportation-related comments and questions made through the February 5, 2014 open record period. We offer responses to two documents:

- February 5, 2014 Letter from Mackenzie
- February 5, 2014 Letter from Carol Radich for the Evergreen Neighborhood Association

Clearly, some of the information documented in these two letters overlaps with response material entered to the project record by the Applicant's team during the February 5 response period. As such, our responses to the two new letters are relatively brief. The brevity of our responses is in deference to your time and is meant to avoid repetition. To ease your review, many of our responses include a citation to materials prepared by Kittelson & Associates, Inc. and previously entered into the record. Specifically, you will see references to:

- December 9, 2013 Block 137 Redevelopment Transportation Impact Analysis (herein referred to as the December TIA);
- January 28, 2014 Block 137 Supplemental Transportation Information letter (herein referred to as the January 28 Supplemental Letter); and
- February 4, 2014 Block 137 Response to Transportation Comments (herein referred to as the February 4 Response Letter)

The remainder of this letter is a summary of key comments made and our response.

## FEBRUARY 5, 2014 MACKENZIE LETTER

Five topic areas are addressed in the Mackenzie letter as listed below along with our response.

### Issue 1: 1<sup>st</sup> Street Garage Access Location

**Response:** As addressed on page 5 of our February 4, 2014 response letter, the driveway should be aligned with the Lake View Village driveway to the extent practical.

### Issue 2: Event Traffic

**Response:** City of Lake Oswego staff addressed the event management subject in their testimony during the public hearing as well as in a January 27, 2014 memorandum from City Engineering staff to the Development Review Commission (DRC) as shown in Exhibit F-17. City staff concluded “Engineering believes it is the responsibility of the event organizer to address the traffic impacts from its event, not to condition a private development to manage or control traffic or congestion caused by the special event’s traffic upon adjacent businesses and residences.”

### Issue 3: Existing Development Trip Generation

**Response:** The December 2013 TIA provides an assessment of site development traffic impacts in accordance with City of Lake Oswego development review requirements. The incremental increase in trips associated with site redevelopment was identified, analyzed, and mitigation measures were recommended. The December 2013 TIA serves as the basis for regulatory review.

Kittelson & Associates, Inc. staff provided comparisons of the proposed site trip generation relative to prior uses in an effort to address questions raised by some community members. The comparisons demonstrate that the proposed uses will generate fewer trips than prior site development has generated and were offered to provide context – the new development will generate fewer trips than the same property has in the past. Further, if a new retail tenant were to fully re-occupy the space without doing any building modifications, these comparisons demonstrate how many trips could be generated by the site without triggering a land use review or traffic impact study.

We note that the Mackenzie letter does not dispute the trip generation comparison nor that the proposed development will generate fewer trips than the former commercial site development.

Comments provided in the letter related to Mackenzie staff’s observations of parking patterns and site trips were based on observations made after closure of the Wizer’s supermarket and are both out of context and irrelevant as documented on pages 2-3 of our February 4 Response Letter; therefore, no additional analysis is needed.

### Issue 4: Network Analysis and Mitigation

**Response:** Our January 28 Supplemental Letter provided supplemental SimTraffic Analysis requested by Mackenzie staff and documented the relative impact of site development at study intersections along “A” Avenue. Contrary to Mackenzie’s statements, the impact of site redevelopment on traffic operations is not significant and does not warrant mitigation per City standards.

Despite this and as documented in our February 4 Response Letter, while not required, the Applicant has volunteered a financial contribution to the City of Lake Oswego to support synchronization of traffic signals on “A” Avenue. The contribution offered by the Applicant far exceeds the proportional impact of the proposed site development.

## Issue 5: Summary

The Mackenzie letter closes opining: “The proposed development significantly increases density and FAR on the subject property. And with these increases, comes transportation impacts. Consistent with City vision, it is realistic to assume the Blocks 148 and 149 will redevelop and will also have increased density and transportation impacts. Therefore, it is imperative the DRC and the City properly plan for these impacts and appropriately assess new development, including the Applicant’s, as it occurs.”

**Response:** The proposed development will create additional trips on the transportation system and the December 2013 TIA demonstrates the impacts of those trips. Further, the TIA clearly demonstrates that no off-site mitigation measures are needed to mitigate traffic impacts. As part of the development, existing site driveways will be consolidated and reconfigured to better manage vehicular access to the site, and reduce potential conflict points between modes. Site frontage improvements will be made to better serve all transportation modes.

Kittelsohn & Associates, Inc. staff testimony at the January 22, 2014 DRC Public Hearing noted that the City of Lake Oswego is currently preparing a Transportation System Plan Update that forms the community’s basis for identifying and planning long-term transportation needs, including those associated with downtown redevelopment. The TSP, not the Wizer land use application, is the appropriate forum for consideration of how other blocks within the downtown may re-develop in the future.

We believe that the December 2013 TIA methodology and analyses were prepared in accordance with City regulatory criteria and industry practice. Supplemental analysis and technical information has been provided to address questions raised through the DRC public hearing process. Further, the Applicant has volunteered to financially contribute to long-term system improvements in an amount that exceeds the proposed development’s proportional impact to study intersections.

Fundamentally, the proposed development will generate fewer trips than prior site development; for local residents this means site-development trip impacts will be no worse than those experienced in the past.

Consistent with Mackenzie’s closing remark, we believe that 1) the City of Lake Oswego is planning for development and redevelopment impacts through the community’s on-going Transportation System Plan Update and 2) the City of Lake Oswego staff report appropriately assesses the traffic impacts of the proposed Block 137 redevelopment. We concur with the staff report and support the additional financial contribution (to “A” Avenue traffic signal coordination) the Applicant has volunteered above and beyond the regulatory-based mitigation.

## FEBRUARY 5, 2014 EVERGREEN NEIGHBORHOOD LETTER

The Evergreen Neighborhood Letter raises the following traffic issues.

### Issue 1: First and Second Streets

The letter notes that 1<sup>st</sup> and 2<sup>nd</sup> Streets between A and Evergreen are designated local residential streets and states additional traffic will push both streets well beyond capacity.

**Response:** It is unclear what analysis was completed to support the claim that the local streets will be pushed beyond the capacity. As shown, the proposed site plan provides a single access on 2<sup>nd</sup> Street that will serve the residential component of the proposed site development. The proposed residential driveway will be serving local residents, which is an appropriate use of the local street. Further, the December 2013 TIA demonstrates there is adequate capacity to accommodate the proposed development at both the “A” Avenue/2<sup>nd</sup> Street intersection and the Evergreen Road/2<sup>nd</sup> Street intersection.

Commercial site access is proposed only on 1<sup>st</sup> Street in part to minimize potential commercial traffic on 2<sup>nd</sup> Street. The “A” Avenue/1<sup>st</sup> Street intersection has adequate capacity to accommodate the proposed development as demonstrated in the December 2013 TIA.

The proposed site plan reduces the number of site driveways on both 1<sup>st</sup> Street and 2<sup>nd</sup> Street. Further, as documented previously, relative to the former site use and to the potential re-use of the existing building, the proposed development will generate fewer vehicle trips. As such, we confidently conclude there is adequate capacity to support the proposed site development.

### Issue 2 - Relative [traffic] Impact of the Proposal

The Evergreen Neighborhood letter cites the comparison of trips associated with different potential land uses of the site documented in Exhibit F-14 and Exhibit F-17. The letter further states “First, only the impact of the current proposal should be studied; other configurations, including re-occupying the existing space, are not under consideration and, so, are irrelevant” and notes that other land use scenarios could generate fewer trips than the proposed use.

**Response:** As addressed relative to Mackenzie’s Issue #3 above, the December 2013 TIA clearly documents the site traffic impacts for the current proposal and serves as the basis for regulatory review. Beyond the December 2013 TIA, Kittelson & Associates, Inc. staff provided comparisons of the proposed site trip generation relative to prior uses and other potential development options in an effort to address questions raised by some community members. The comparisons demonstrate that the proposed uses will generate fewer trips than prior site development has generated and were offered to provide context; the new development will generate fewer trips than the same property has in the past or could in the future if the existing building were merely reused by retail tenants.

### Issue 3 – Evergreen Road

The letter cites continued concerns related to increased cut-through traffic on Evergreen Road and the Evergreen Neighborhood’s assertion that traffic counts completed by the neighborhood in December 2013 documented indicate that traffic could be significantly increased beyond the projections of the TIA.

**Response:** Evergreen Road cut through traffic has been thoroughly addressed on pages 26 through 29 of the December 2013 TIA, pages 8 and 9 of the January 28 Supplemental Letter, and page 4 of the February 4 Response Letter. The traffic counts completed by the Evergreen Neighborhood were completed in December 2013 after closure of the Wizer’s store as documented on page 2 of our February 4 Response Letter.

### Issue 4 – Crash Rates

Crash rates documented in the City of Lake Oswego’s on-going Transportation System Plan Update are noted in the Evergreen Neighborhood Letter. The neighborhood notes that “Safety is our foremost concern related to increased traffic.”

**Response:** The City’s Transportation System Planning effort is considering appropriate intersection and roadway safety improvement needs, as is noted by the Evergreen Neighborhood letter. The TSP Update is the appropriate forum for addressing neighborhood and city-wide safety measures.

As required by city standards and appropriate to assess impacts, the December 2013 TIA also considered intersection crash history and found no need for safety-based mitigation in conjunction with the proposed site redevelopment (see page 15 of the report).

The proposed site development is making frontage improvements (driveway consolidation and closure, removal of all driveways from “A” Avenue, etc.) that will improve the experience of the traveling public using all modes. Further, the Applicant has volunteered a financial contribution to traffic signal synchronization on “A” Avenue that is not required and exceeds the proportionate share impact of the project.

### Issue 5 – Intersection Level of Service

The Evergreen Neighborhood Association letter questions “Will the greatly increased population density of Block 137 affect intersection level of service because of increased pedestrian use in the downtown area, particularly at the corner of 1st and A?”

**Response:** Increased pedestrian movements at the intersection of “A” Avenue/1<sup>st</sup> Street can be expected to result in an incremental increase in delay at the intersection but are not expected to change the intersection level of service (the intersection is forecast to operate at Level of Service “B”).

Both pedestrian and vehicular movements at the intersection are signaled and can readily be accommodated with the infrastructure currently in place.

## SUMMARY

The comments offered in the February 5, 2014 letters do not raise issues requiring additional analysis. We trust the responses provided in this letter provide DRC members with sufficient information needed to evaluate the proposal's transportation impacts.

Please let me know if you have any questions.

Sincerely,  
KITTELSON & ASSOCIATES, INC.



Chris Brehmer, P.E.  
Principal Engineer

