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MEMORANDUM

TO: Matt Alexander, Lower Columbia Engineering
 Chris Liu, Land Use Planner, Multnomah County

CC: case file

FROM: Graham Martin, Transportation Planner

DATE: July 23, 2021, updated February 16, 2022

ADDRESS: 31520 E Woodard Rd (R341422)

SUBJECT: **Middle School, Corbett School District - County findings and requirements.**

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 preliminary information submitted to County Transportation. 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.

The applicant seeks to develop a middle school for Corbett Middle School with accesses onto E Woodard Rd, a County maintained Rural Collector facility.

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 FINDINGS (revised findings include strike out of previous text and added text in blue)

1. County access standards (MCRR 4.000) for the proposed access on E Woodard Rd are **not met**. The applicant will be required to meet County standards, apply for a Road Rules Variance (MCRR 16.000) or an Existing Non-Conforming Access (MCRR 4.700). **Pursuant to MCRR 4.700, Applicant provided drawings to County Transportation enabling staff to deem the accesses to the property as Existing Non-Conforming Accesses.**
2. The proposal may generate a transportation impact (MCRR 5.000) and the applicant is required to provide a trip generation memo to County transportation for review. **Applicant submitted information to County Transportation satisfying this requirement.** A transportation impact may require

- a. Frontage improvements, as deemed necessary, such as:
 - i. Ensuring that any curb cuts, curbs and sidewalk meet County and ADA requirements [MCRR 6.100 c]. Drawings submitted to County Transportation do not foresee any additional requirements. However, at the time of applying for the ROW permit (see finding 3 below) minor driveway width modifications will be reviewed by the County Engineer.
 - ii. Ensuring that drainage facilities meet County Transportation stormwater requirements [MCRR 26.000], as approved via the stormwater certificate and report submitted as part of the transportation planning review. Any changes must be reviewed and approved.
- b. No ROW dedication is required as the existing ROW on E Woodard Rd meets County standards.
- 3. After Land Use/Hearing Officer approval ~~the proposal has an access that meets the requirements in finding 1 above,~~ apply for a ROW access permit for the development. As part of the ROW permit application, the applicant shall provide
 - a. a site plan showing both of the accesses to the property, location of roadway, and parcel lines, and provide annotation of the plans with the width of the driveways and accesses. [MCRR 18.250]
 - b. Applicant will include the reconfigured driveway dimensions on the submitted plan to be approved by County Engineer.

FINDINGS

ACCESS STANDARDS

Access standards that apply for a commercial facility on a rural collector:

REQUIREMENT	PROPOSED	STANDARD MET	ADDITIONAL REQUIREMENTS
One access per property [MCRR 4.200]	Three accesses (existing) onto E Woodard Rd	No	Meet standard (access via 3rd Ave) or apply for Road Rules Variance or Existing Non Conforming Access (ENCA). The accesses have been established as ENCA, per MCRR 4.700.
Access via lower classification road on a double frontage lot	No double frontage lot	N/A	N/A
Access spacing > 98 feet to intersection and 98 feet between driveways [MCRR 4.300; MCDCM Table 1.2.5]	Access points are > 98 feet from the nearest intersection and driveways.	Yes	N/A
Access width between 20 and 35 feet/6 and 10.5 m [MCRR 4.400; MCDCM Table 1.2.4]	West Access (22 feet, apron 55 feet); Central access (18 feet, apron 74 feet); East access (24 feet, apron 52 feet).	No	Meet standard or apply for Road Rules Variance or Existing Non Conforming Access (ENCA). The accesses have been established

			as ENCA, per MCRR 4.700. Applicant will be reconfigure the central access to meet County standard access width, as part of the ROW permit, per MCRR 18.000.
Stopping sight-distance, for a road with a speed limit of 45 mph is 360 feet [MCRR 4.500]	Sight distance from access exceeds minimum requirement. N.B speed zones for schools will significantly reduce the distance required.	Yes	N/A

To meet the access standards, the applicant can:

- Provide a single access (preferably the central access) and close the two other existing accesses to meet the County standard; or
- Apply for an Existing-Non Conforming Access (MCRR 4.700) for the access on E Woodard Rd. This requires the applicant to provide documentation, usually in the form of a zoning or building permit application that shows that the three existing accesses have previously been included in a land use/planning review. As there are existing buildings on the property, the applicant may be able to provide documentation that can establish the access via this route; or
- Apply for a Road Rules Variance (MCRR 16.000) for the accesses on E Woodard Rd. A Road Rules Variance application is equivalent to a type II land use application and requires neighbor notification. The fee for a road rules variance application is \$1410. Contact row.permits@multco.us to obtain the necessary requirements and forms to submit a road rules variance application.

Pursuant to MCRR 4.700, Applicant provided drawings to County Transportation enabling staff to deem the accesses to the property as Existing Non-Confirming Accesses.

MCRR 5.000 Transportation Impact

MCRR 5.100 To determine if a Transportation Impact is caused by a proposed development, the County Engineer will determine the number of new trips generated by a site by one of the following methods:

- A. Calculations from the most recent edition of the Institute of Transportation Engineers’ Trip Generation (ITE); or*
- B. A site development transportation impact study conducted by a professional engineer registered in the State of Oregon and accepted by the County.*

The Multnomah County Road Rules defines a Transportation Impact as the effect of any new construction or alteration which will increase 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 [MCRR 3.000]. A minimum increase of 10 new trips per day is required to find a transportation impact.

The proposed development may generate a transportation impact. Provide a trip generation memo to County transportation for review. Requirement satisfied.

MCRR 6.000 Improvement Requirements

Per 6.100 A, ROW dedication may be required if the existing ROW does not meet County standards. The existing ROW width of E Woodard Rd is 60 feet. The preferred ROW width for a rural collector is 60 feet. **No ROW dedication is required.**

Per MCRR 6.100B, frontage improvements may be required to meet other County engineering standards (e.g ADA requirements). These include, but are not limited to the following:

- Ensure that the curb cuts, curbs and sidewalk meet County and ADA requirements [MCRR 6.100 c].
Ensuring that on-site drainage facilities continue to meet County Transportation stormwater requirements [MCRR 26.000] as approved [MCRR 6.100B f; MCRR 26.000].

Applicant will be reconfigure the central access to meet County standard access width, as part of the ROW permit, per MCRR 18.000.

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>

The applicant provided a stormwater certificate and report for review (see attached). This was reviewed and approved. Any changes to the stormwater on site must be provided to County transportation for review.