



Planning Application AR-20-05
Public Comment



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July 16, 2020

BY EMAIL: khart@ci.lebanon.or.us

Kelly Hart
City of Lebanon
925 Main Street
Lebanon, OR 97355

RE: City's Determination regarding Traffic Impact Analysis – File AR 20-05

Dear Kelly,

As you know this office represents the applicant, Farmworker Housing Development Corporation ("Applicant" or "FHDC"), in the above-referenced file. This letter is a request for the City to supplement its staff report with additional support for its determination that a traffic impact analysis is not required for this application for a 24-unit multi-family development under Lebanon Development Code ("LDC") 16.20.110.B.3. Please include this letter in the record for File AR 20-05.

Under LDC 16.20.110.B.3, the City may require a traffic impact study when a land use application involves an increase in traffic volume generation by 300 average daily trips. The June 10, 2020 staff report states, "City staff have reviewed the criteria and determined the current proposal does not meet the criteria to require a traffic impact analysis." The Applicant agrees with the City's determination that no traffic impact study is required for this project, however, requests that the City include additional support for this determination to support its conclusions. Please include responsive information from the City's traffic engineer to support this conclusion that approval of this application will not increase traffic by 300 average daily trips and include in the record during the open record period, if possible, or the response period to open record submittals. Please do not include a traffic impact analysis related to another proposal not currently incorporated in this application because no traffic impact analysis is required here and its inclusion would confuse the proceedings.

Thank you for you attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Jennifer Bragar'. The signature is fluid and cursive, with the first name 'Jennifer' written in a larger, more prominent script than the last name 'Bragar'.

Jennifer Bragar

JMB/jr
cc: client (by email)



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July 22, 2020

Jennifer Bragar
Tomasi Salyer Martin
121 SW Morrison Street, Suite 1850
Portland, OR 97204
Sent via email

RE: City's Determination regarding Traffic Impact Analysis – File AR-20-05

Dear Ms. Bragar,

On July 16, 2020, the City received your letter for the Farmworker Housing Development Corporation project for the above-referenced file. This letter requested that the City provide support to the conclusion that the 24-unit apartment complex project proposed would not exceed 300 daily vehicle trips, and is therefore not subject to a traffic impact study as identified under Lebanon Development Code Section 16.20.110.B.3.

The City uses the Institute of Transportation Engineers (ITE) Trip Generation Manual 10th Edition, Volume 2: Data Part 1 (Land Uses 000-399) to identify the expected daily trips for residential uses. Per Land Use 221, the proposed development being three stories in height is considered "Mid-Rise Multifamily Housing." Per the ITE, the average daily weekday trip rate for a Mid-Rise Multifamily project is 5.44 trips per unit. The proposed development is 24-units. Therefore, the anticipated daily trips for the project would be 130.56. As such, the project does not generate 300 daily trips, and would not trigger the requirement for a traffic impact study.

Sincerely,

Ron Whitlatch
City Engineer

Land Use: 221

Multifamily Housing (Mid-Rise)

Description

Mid-rise multifamily housing includes apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have between three and 10 levels (floors). Multifamily housing (low-rise) (Land Use 220), multifamily housing (high-rise) (Land Use 222), off-campus student apartment (Land Use 225), and mid-rise residential with 1st-floor commercial (Land Use 231) are related land uses.

Additional Data

In prior editions of *Trip Generation Manual*, the mid-rise multifamily housing sites were further divided into rental and condominium categories. An investigation of vehicle trip data found no clear differences in trip making patterns between the rental and condominium sites within the ITE database. As more data are compiled for future editions, this land use classification can be reinvestigated.

For the six sites for which both the number of residents and the number of occupied dwelling units were available, there were an average of 2.46 residents per occupied dwelling unit.

For the five sites for which the numbers of both total dwelling units and occupied dwelling units were available, an average of 95.7 percent of the total dwelling units were occupied.

Time-of-day distribution data for this land use are presented in Appendix A. For the eight general urban/suburban sites with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 7:00 and 8:00 a.m. and 4:45 and 5:45 p.m., respectively.

For the four dense multi-use urban sites with 24-hour count data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 7:15 and 8:15 a.m. and 4:15 and 5:15 p.m., respectively. For the three center city core sites with 24-hour count data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 6:45 and 7:45 a.m. and 5:00 and 6:00 p.m., respectively.

For the six sites for which data were provided for both occupied dwelling units and residents, there was an average of 2.46 residents per occupied dwelling unit.

For the five sites for which data were provided for both occupied dwelling units and total dwelling units, an average of 95.7 percent of the units were occupied.

The average numbers of person trips per vehicle trip at the five center city core sites at which both person trip and vehicle trip data were collected were as follows:

- 1.84 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 1.94 during Weekday, AM Peak Hour of Generator
- 2.07 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.
- 2.59 during Weekday, PM Peak Hour of Generator

The average numbers of person trips per vehicle trip at the 32 dense multi-use urban sites at which both person trip and vehicle trip data were collected were as follows:

- 1.90 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 1.90 during Weekday, AM Peak Hour of Generator
- 2.00 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.
- 2.08 during Weekday, PM Peak Hour of Generator

The average numbers of person trips per vehicle trip at the 13 general urban/suburban sites at which both person trip and vehicle trip data were collected were as follows:

- 1.56 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 1.88 during Weekday, AM Peak Hour of Generator
- 1.70 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.
- 2.07 during Weekday, PM Peak Hour of Generator

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Alberta (CAN), British Columbia (CAN), California, Delaware, District of Columbia, Florida, Georgia, Illinois, Maryland, Massachusetts, Minnesota, New Hampshire, New Jersey, Ontario, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Virginia, and Wisconsin.

Source Numbers

168, 188, 204, 305, 306, 321, 357, 390, 436, 525, 530, 579, 638, 818, 857, 866, 901, 904, 910, 912, 918, 934, 936, 939, 944, 947, 948, 949, 959, 963, 964, 966, 967, 969, 970

Multifamily Housing (Mid-Rise) (221)

Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 27
Avg. Num. of Dwelling Units: 205
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate

5.44

Range of Rates

1.27 - 12.50

Standard Deviation

2.03

Data Plot and Equation

