

From: Caroline A. Richter
To: [Ballew, Cassie](#)
Cc: [Ty K. Wyman](#); [Linda K. Odermott](#)
Subject: Design Commission - Written Comment re 3415 SE 62nd Avenue (Case File LU 17-144195 DZ)
Date: Thursday, February 15, 2018 3:10:57 PM
Attachments: [DCAPDX-2617540-v1-Design Commision co Cassandra Ballew re 3415 SE 62nd Avenue - Case File LU 17-144195 DZ \(2-15-18\).PDF](#)
Importance: High

Hello Cassandra,

Attached please find Ty Wyman's written comment to the Design Commission on behalf of Northwest Self-Storage regarding the above-referenced case file.

If you have any questions, please do not hesitate to contact us.

Caroline A. Richter
Assistant to Ty K. Wyman
crichter@dunnarney.com
Direct 503.306.5338 | Fax 503.224.7324 | DunnCarney.com



Dunn Carney Allen Higgins & Tongue LLP
Suite 1500, 851 SW Sixth Avenue | Portland, OR 97204
Member of Meritas Law Firms Worldwide Meritas.org

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Ty K. Wyman
Admitted in
Oregon and Washington
twyman@dunn-carney.com
Direct 503.417.5478

February 15, 2018

**Via Mercury Messenger Delivery
and Email: Cassandra.Ballew@portlandoregon.gov**

Design Commission
c/o Cassandra Ballew, Planner
City of Portland, Oregon
Bureau of Development Services
1900 SW Fourth Avenue, Suite 5000
Portland, OR 97201

Re: 3415 SE 62nd Avenue at SE Powell Boulevard
BDS Case File No. LU 17-144195 DZ
Our File No.: NOR204-1

Dear Commission:

As the Commission noted at the Feb. 1 hearing, the applicant has submitted several versions of its site plan. Given the breadth and depth of commissioners' comments about those plans, it is evident that the applicant will respond during this record open period with yet another set of plans. I look forward to commenting in two weeks on those plans. For now, while interested parties follow the bouncing ball of this applicant's design, I tender the following observations.

PCC 33.284.050.A requires that:

The building and roof are designed to be compatible with surrounding development, especially nearby residential uses. Considerations include design elements that break up long, monotonous building or roof lines and elements that are compatible with the desired character of the zone.

Compatible means "capable of existing together in harmony."¹ Thus, determining compatibility between any two things necessarily requires comparison of their features. In the context of PCC 33.284.050.A, these features are the designs of buildings and roofs (*i.e.*, the required compatibility does not relate to parking or landscaping).

¹ <https://www.merriam-webster.com/dictionary/compatible> - accessed Feb. 15, 2018.



Thus, the evidence that an applicant must provide in order to address this criterion is quite clear. First, an applicant must identify "surrounding development," *i.e.*, nearby buildings and roofs, especially the residential ones.² Second, the applicant must describe the design features of those residences. Third and last, the applicant must explain how it harmonized the design of its building and roof with those neighboring buildings and roofs.

Nothing suggests that the applicant undertook any of this required evidentiary analysis.³ To be sure, it devoted time and effort to produce for the Commission a power point that airbrushed its proposed design as well as possible. Did the applicant bother to show the Commission a single nearby building or roof design, however? No. Without such evidence, it is not possible for the applicant to demonstrate that its building and roof design are compatible with surrounding residential development.

Fortunately, in this day and age of Google Earth, such visuals are easy to find. Four residential uses abut the Site:

² The evidence that must be adduced under this criterion is necessarily specific to the site of the self-storage proposal. *I.e.*, the development surrounding a given site is not a function of city-wide or even district-wide development. Also, whatever constitutes surrounding development, it includes abutting properties.

I further note that the applicant's design must be compatible with existing development, not with the zoning of those sites.

³ Armed with no evidence from the applicant, staff did the best it could with PCC 33.284.050.A, finding as follows (Staff decision at p. 7):

Nearby commercial and residential development consists of a variety of architectural styles and materials, including brick, wood, vinyl, concrete masonry unit, stucco, metal construction and cladding. Given the scale and use of the surrounding context it is worth noting that although this use is allowed in the General Commercial Zone, the guidelines require that the design include elements that are compatible with the desired character of the zone.

This finding does not identify development surrounding the Site. Indeed, it is identical to the findings rendered under PCC 33.284.050.A in LU 17-135754 DZM (67th/Halsey) (Ex. A) and LU 16-239933 DZ (82nd/Brooklyn) (Ex. B). That the findings in each case are identical shows a lack of individualized determination of the development surrounding each given site.



1. To the north sits 3333 SE 62nd Ave., built in 1952 and pictured in Ex. C. Stacie and Greg Greer own and reside here. They testified in opposition. Their home is a one-story design, with a distinct hip roof.
2. To the northwest sits 6011 SE Haig St., built in 1953 and pictured in Ex. D. Owned by Carol Cochran, it also features a single one-story design with hip roof.
3. Immediately to the west is 6010 SE Haig St., built in 1924 and pictured in Ex. E. Like the Greer and Cochran homes, this is a single-story design; it features a low-slope roof, though in a half-hip design.
4. To the east is 3408 SE 62nd Ave., built in 1922, in which Laura Claar resides and pictured in Ex. F. Like the Greers, Ms. Claar testified in opposition. Her home is also one story, featuring a craftsmen style with front gables and deeply overhanging, open eaves with distinctive support brackets.

So, each adjoining residence – the focus of the compatibility test – is one story featuring a hip roof. The applicant has taken steps to mitigate the boxy nature of its design, but mitigation is not relevant to compliance with PCC 33.284.050.A. All the landscaping in the world will not harmonize the applicant's roof line with these hip roofs.

The other design criterion clearly at issue here is PCC 33.284.050.F, Security. Indeed, Commissioners commented at hearing that the proffered design does not comply with this criterion.⁴ I simply note here my agreement.

I expect the applicant will submit new evidence addressing the design criteria. We will review and comment on that evidence in a couple weeks. For now, I close discussion of PCC 33.284.050 with some comments from land use planner Suzannah Stanley of MacKenzie. See Ex. G. Though she did not have the benefit of listening to the Feb. 1 discussion, I'm sure Commissioners will find her observations helpful.

⁴ Chair Livingston: "Placement of the vehicle entry/exit . . . I believe that this has a fairly dramatic impact on the property across the street. I don't see a clear path to addressing that, given what the criteria are."

Commissioner Molinar: "Yeah, I agree with that."

Chair Livingston: "Related to that, the open parking is very troublesome."

Commissioner Molinar: "Does not meet PCC 33.284.050.F, Security."

Chair Livingston: "No, it doesn't."

Commissioner Molinar: "By a long shot."

Commissioner Savinar: "It needs to be closed."

Commissioner Molinar: "It needs to be closed."

Chair Livingston: "So, there's a big fail here with the open parking."



The City leaves somewhat unclear the scope of the Commission's review of the applicant's proposal. On the one hand, the Jan. 8 notice of the Feb. 1 hearing states as follows:

Relevant Approval Criteria: In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- 33.284.050 Self Storage Design Guidelines.

The notice lists no other criteria as applicable to the Commission's decision.⁵ Also, staff and commissioners repeatedly disclaimed authority over other of the City's land use regulations.

Nonetheless, land use regulations other than PCC 33.284 clearly apply to the proposed development. See Ex. H, p. 2 of BDS' notes of the Feb. 9, 2017 Early Assistance meeting, which lists 33.130 (Commercial Zones), 33.248 (Landscaping and Screening), 33.266 (Parking and Loading), and 33.410 (Buffer Zone) as sources of applicable criteria (in addition to 33.284 Self Service Storage). We find no existing determination (by BDS staff or any other review authority) of compliance with these criteria.

Based on the foregoing, I understand the City to apply its land use regulations to the proposed development in a bifurcated manner – the Design Commission determines compliance with the criteria of PCC 33.284 and some other review body determines compliance with the other applicable criteria. Notwithstanding this latter review process, in order to inform the Commission as fully as possible about the subject application, I note the following.

Table 130-3 requires that at least 15% of the site be landscaped. The landscape plan attached to the Dec. 20 staff decision asserts 10,090 sq.ft of landscaping. The staff decision (p. 2) states the site area as 68,374 sq.ft, which puts the applicant under 15% ($10,090/68,374 = 14.76\%$).

I also asked traffic engineer Brent Ahrend of MacKenzie to review documents provided us by PBOT and ODOT. He did not have benefit of listening to PBOT's comments at hearing, but I think offers some perspectives helpful to the Commission's deliberation.

⁵ Because the hearing notice lists no other criteria, it would be procedural error for the Commission to determine compliance with code provisions other than the design criteria of PCC 33.284.050.



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His observations certainly add credibility to neighbors' stated concerns about vehicle circulation and queuing. See Ex. I.

In conclusion, we do not dispute the applicant's frequent comment at hearing that self-storage is allowed outright on the site. That fact simply does not shield it from the many development standards of the code, particularly the requirement to demonstrate to this Commission that it has designed a building that is harmonious with the designs of abutting residences.

I submit this letter on behalf of Northwest Self Storage and appreciate your attention.

Very truly yours,

Ty K. Wyman

TKW:car

cc: Kevin Howard, Northwest Self Storage (w/encl.)
Suzannah Stanley (w/encl.)
Brent Ahrend (w/encl.)
Dana L. Krawczuk (w/encl.)

DCAPDX_2612796_v1

A. Building and roof design. The building and roof are designed to be compatible with surrounding development, especially near residential uses. Considerations include design elements that break up long, monotonous building or roof lines and elements that are compatible with the desired character of the zone.

C. Street facades. The design and layout of the street side of the site provides a varied and interesting façade. Considerations include the use of setbacks, building placement, roof design, and variations in building walls, fencing, other structural elements, and landscaping.

Findings for A & C: The proposed three story self-storage facility building is located along a major transit corridor (NE Halsey Street) which is a continuous mix of CG, EG2 and R2 zoning directly around the site. Nearby development consists of a variety of architectural styles and materials, including brick, wood, vinyl, concrete masonry unit, stucco, metal construction and cladding. Given the scale and use of the surrounding context it is worth noting that although this use is allowed by right in the General Commercial Zone, it is not the highest or best use for the site. To respond to this concern, staff worked with the applicant to ensure this proposal specifically addressed the issues of parking lot orientation, setbacks, height, massing and material composition to create a responsive and cohesive addition to the neighborhood. These elements are reflected in the following aspects of the design:

Street Facing Facades. On the NE Halsey Street façade, the building has been brought up to the street and the ground floor level has been defined by large windows, ground-face CMU in a running bond pattern, and a series of steel canopies at the first and second floor which wrap the corner onto NE 67th Avenue. Above the ground floor is a series of storefront window systems, in alternating patterns, set in a façade of box rib metal panels in alternating colors. The large storefront windows and canopies wrap the corner onto NE 67th Avenue connecting the two street elevations using elements that are compatible with the commercial character of this zone.

This storefront character has been carried onto the rest of the façade, particularly at the northern end which steps down from the main mass of the facility. This corner element will be composed of white, flat metal panel, anodized aluminum storefront systems, a 5'-0" canopy and transom windows. The height and composition of the main office and main entrance, breaks up this long monotonous façade and successfully simplifies the massing, creating a hierarchy by using a more pedestrian scale at the street. Additionally, locating the entry at this corner within the main office will allow for a better pedestrian experience, rather than locating it on NE Halsey, adjacent to the Banfield Expressway. Articulation of the exterior facades along the NE Halsey Street and NE 67th Avenue breaks up the wall plane to create architectural interest for a larger scale building that is allowed in the mix of more intense commercial uses that characterize the General Commercial zone.

End Wall Conditions. Each end wall of this facility has been designed with the adjacent context, setbacks and landscaping in mind. The northern end wall features a portion of the main office space, where the ground floor storefront system, canopies and transom wrap the corner, adjacent to the proposed parking and driveway area. This element creates a transition in height at the street, improving conditions for pedestrians by introducing a more human scale to this massive end wall. The remainder of this façade is broken up into 4 distinct bays of box rib metal panel, along with a strip of windows and flat metal panel along the eastern portion of the façade. Staff worked with the applicant to focus on massing breaks, rather than more glazing, to help break up this façade. Additionally, given façade's adjacency to a parking area and the blank, brick wall belonging to the adjacent commercial development, staff felt the large setback, massing breaks, and intensive landscaping would successfully mitigate this large monotonous façade.

The east and southeast façades, which are across from a residential development and adjacent to the Banfield Expressway, feature similar materials. The east façade features

proposal were presented in an effort to appease concerns and improve the project. These issues raised by Fubonn Shopping Center LLC and the Jade District will be addressed in the findings for the approval criteria for the requested land use reviews, below.

ZONING CODE APPROVAL CRITERIA

Chapter 33.284 Self Service Storage

33.284.010 Purpose Self-Service Storage uses have some characteristics in common with both commercial use and industrial uses. This chapter provides regulations so that Self-Service Storage uses can be appropriately sited in either industrial or some commercial zones, while maintaining the desired character and function of the specific zones. In general, Self-Service Storage uses are similar to other commercial uses in that they provide a service to residential and business uses. The character of their development is often more similar to industrial buildings and their low activity level does not add to the vitality of a commercial area.

Section 33.284.050 Self-Service Storage Design Guidelines

These design guidelines are used to review new Self-Service Storage uses in the C and EX zones. They apply in addition to any design guidelines that apply because of an overlay zone or plan district.

Note: In this case, there is no design overlay and no plan district so there are no additional guidelines for this proposal.

A. Building and roof design. The building and roof are designed to be compatible with surrounding development, especially near residential uses. Considerations include design elements that break up long, monotonous building or roof lines and elements that are compatible with the desired character of the zone.

Findings: The proposed three story self-storage facility building is located along a major transit corridor (SE 82nd Avenue) and adjacent to a residential development to the east and a variety of commercial development to the north, south and west. Nearby commercial and residential development consists of a variety of architectural styles and materials, including brick, wood, vinyl, concrete masonry unit, stucco, metal construction and cladding. Given the scale and use of the surrounding context it is worth noting that although this use is allowed by right in the General Commercial Zone, it is not the highest or best use for the site. In an effort to respond to this concern, staff worked with the applicant to ensure this proposal specifically addressed the issues of setback, height, massing and material composition of each façade, in an effort to create a responsive and cohesive addition to the neighborhood. These elements are reflected in the following aspects of the design:

Street Facing Facades. On the SE 82nd Avenue façade, the building has been brought up to the street and the ground floor level has been defined by large storefront windows, charcoal ground-face CMU in a mixed-size pattern, and a series of steel canopies. Above the ground floor is a series of alternating metal panel patterns and parapet heights, creating five distinct bays along this street façade. The two smallest bays feature a mixed of multi-colored metal panels and are set back 6" from the larger three bays. The larger bays consist of flat metal panel and contain a series of large window systems centered vertically within the bays. This alternating pattern continues onto SE Brooklyn Street and creates a pattern which not only breaks up the long monotonous facades by simplifying the massing and creating hierarchy, but also activates them by providing views of the uses within. The larger glazed bays at the NW, SW and SE corners of the proposal create emphasis on these spaces and create a hierarchy within each long street façade. Articulation of the exterior facade along the SE 82nd Street and SE Brooklyn Avenue frontages breaks up the wall plane to create architectural interest for a larger scale

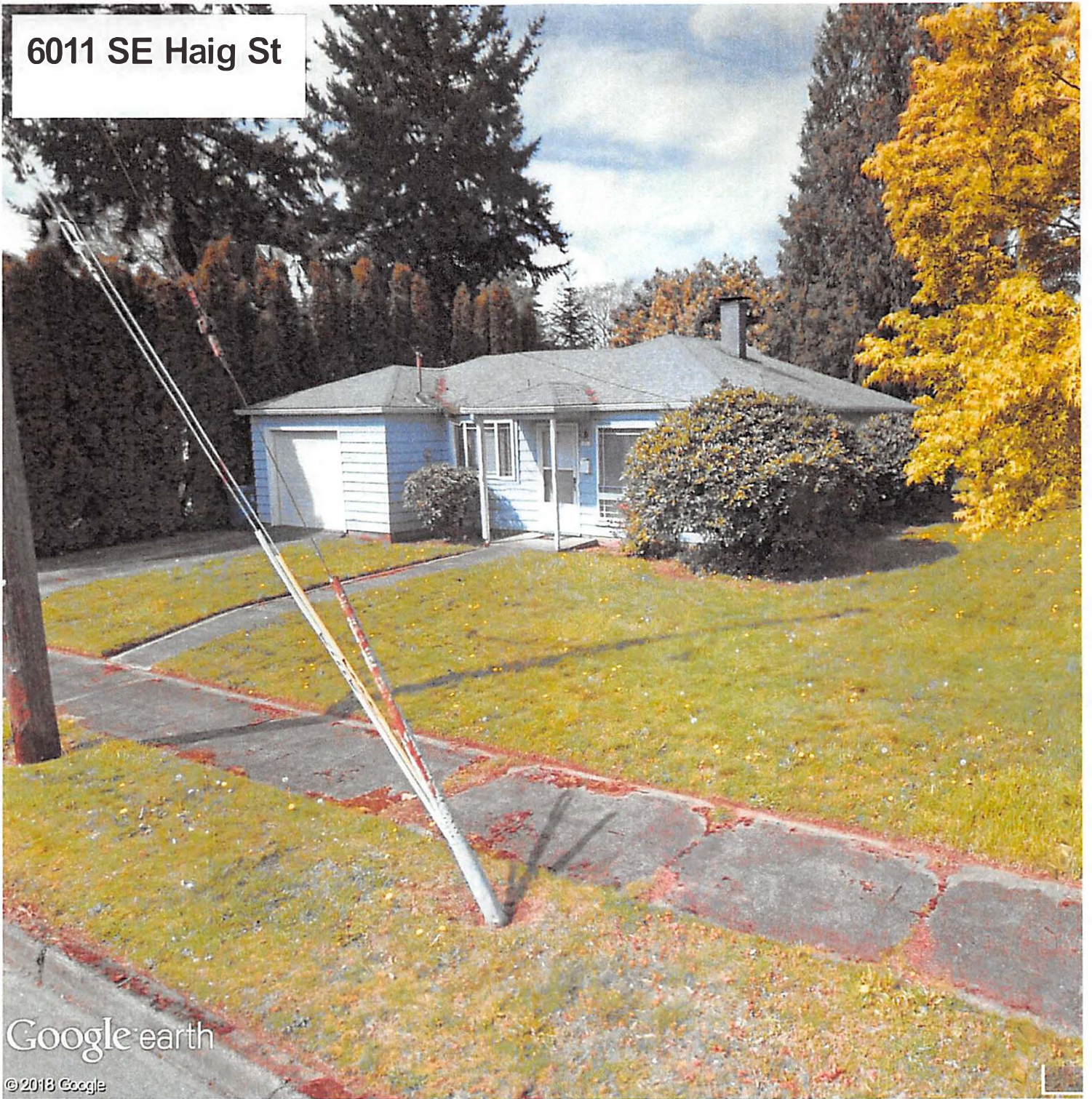
3333 SE 62nd



Google earth

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6011 SE Haig St



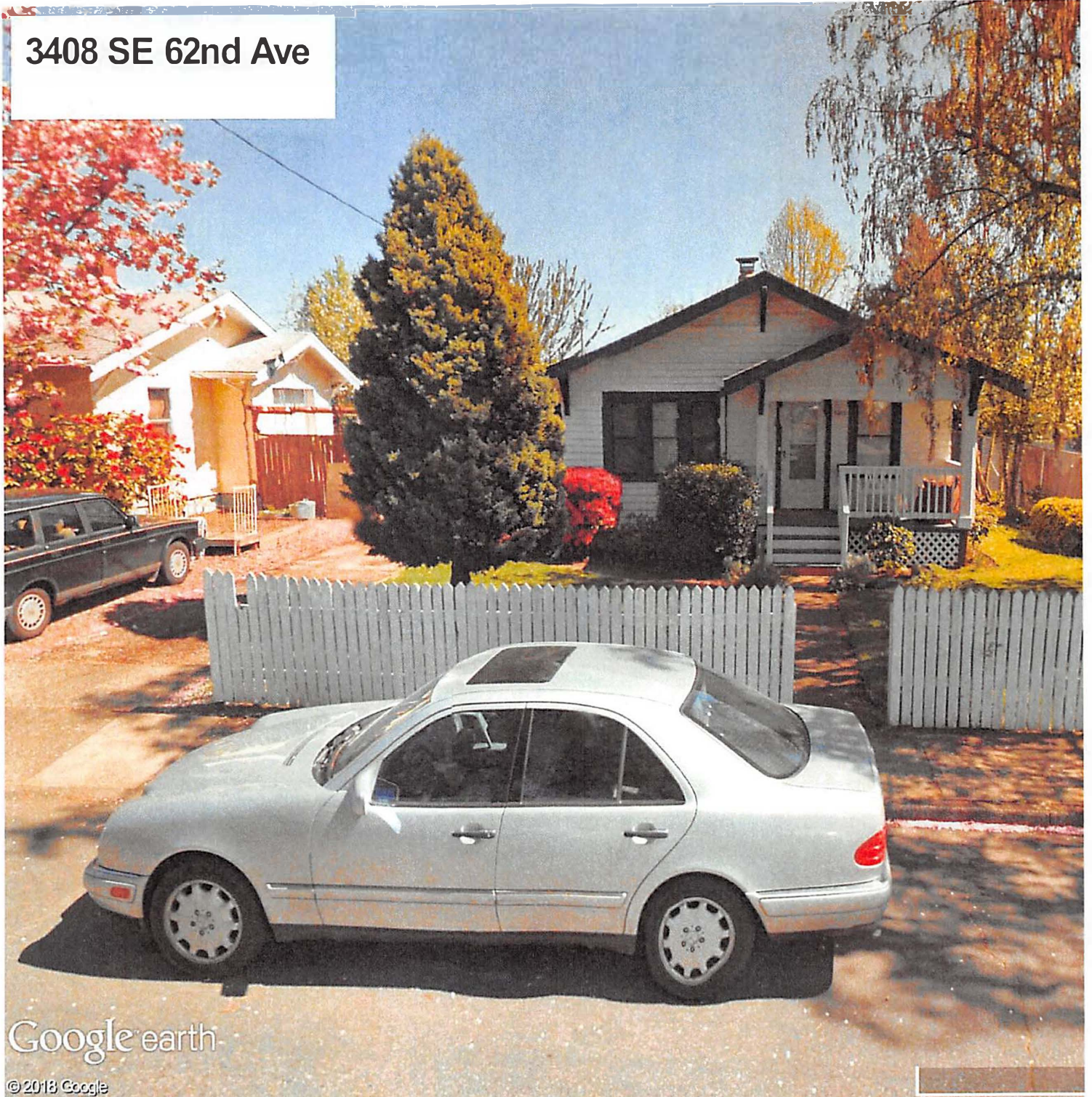
6010 SE Haig St



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3408 SE 62nd Ave



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Caroline A. Richter

From: Ty K. Wyman
Sent: Thursday, February 15, 2018 12:59 PM
To: Caroline A. Richter
Subject: FW: FW: Leon Capital Project - 62nd/Powell

Last exhibit

From: Suzannah Stanley [mailto:SStanley@mcknze.com]
Sent: Thursday, February 15, 2018 12:39 PM
To: Ty K. Wyman <TWyman@dunncarney.com>
Cc: Dennis Woods <DWood@mcknze.com>; Brent Ahrend <BAhrend@mcknze.com>
Subject: RE: FW: Leon Capital Project - 62nd/Powell

Hi Ty,

A. Building and roof design. *The building and roof are designed to be compatible with surrounding development, especially nearby residential uses. Considerations include design elements that break up long, monotonous building or roof lines and elements that are compatible with the desired character of the zone.*

Neighborhood Response: Vehicle entry incompatible, structured parking incompatible, mechanical roll-up door incompatible, incubator office space not leasable/compatible. Quoted character standard but did not expound.

Our Response: Also:

1. *The building and roof are designed to be compatible with surrounding development, especially nearby residential uses.* The applicant's presentation included images of surrounding commercial and industrial development (slides 22-27), but did not highlight residential uses which are "especially" part of the guideline. Additionally, most of the images on their slides are of commercial/industrial next to residential, but this does not mean they are in harmony with each other (i.e. the existing examples are not truly compatible). The applicant should provide images of compatible similar buildings/roofs that exist in harmony with residential uses. For example, some large multi-family residential/mixed use buildings have similar size and mass to the proposed self-storage building but would be more compatible with nearby residential uses in this location.
2. *Considerations include design elements that break up long, monotonous building or roof lines* There are columns along the long north and west blank façades, but they do not keep the roof lines from being monotonous as they are in an even pattern. These elements are characteristic of suburban industrial buildings, and do not add to compatibility/harmony with existing small residence nearby.
3. *and elements that are compatible with the desired character of the zone.* The desired character of the CG zone is in part defined by 33.130.030.G.:

The General Commercial (CG) zone is intended to allow auto-accommodating commercial development in areas already predominantly built in this manner and in most newer commercial areas. The zone allows a full range of retail and service businesses with a local or regional market. Industrial uses are allowed but are limited in size to avoid adverse effects different in kind or amount than commercial uses and to ensure that they do not dominate the character of the commercial area. Development is expected to be generally auto-accommodating, except where the site is adjacent to a transit street or in a Pedestrian District. The zone's development standards promote attractive development, an open and pleasant street appearance, and compatibility with adjacent residential areas. Development is intended to be aesthetically pleasing for motorists, transit users, pedestrians, and the businesses themselves.

Because this standard references the development standards of 33.130 and is referred to by the design guidelines of 33.284, the Commission should have reviewed the base zone development standards as well.

These characteristics say that the zone is auto-accommodating but the development is not expected to be on Powell. There is a 109' long blank brick veneer wall on Powell in the middle of the building... this does not create an open and pleasant street experience and is not aesthetically pleasing for pedestrians.

B. Building materials. *The materials used for buildings, roofs, fences and other structures are compatible with the desired character of the zone and are visually pleasing, especially near residential uses.*

Neighborhood Response: Materials changes abrupt, wood fence will obscure landscaping, roll-up door not compatible.

Our Response: The brick veneer is compatible with residential materials (part of desired character of zone standard), but metal panel is not. Surrounding residential uses are largely single-family wood structures and metal panel does not harmonize. Again, a large building with more of a multi-family residential look and materials would be more appropriate.

C. Street facades. *The design and layout of the street side of the site provides a varied and interesting facade.*

Considerations include the use of setbacks, building placement, roof design, variations in building walls, fencing, other structural elements, and landscaping.

Neighborhood Response: Uneven spacing between piers, long façade on Powell doesn't reflect nearby small lot pattern, west side needs more articulation, 2nd floor windows should be required as COA

Our Response: There is a 109' blank wall on Powell, not varied or interesting. The A-B pattern is only repeated once on the Powell façade, resulting in very long stretches of all brick or all glazing at the ground floor. There is almost no variation in setbacks on the street sides; more regular step-backs would give more variety. There is also very little landscaping or other softening treatment on the street sides.

D. Landscaping. *The landscaping on the site provides appropriate transition from public to private spaces, separates and buffers the buildings from other uses especially abutting residential uses, and provides visual relief from stark, linear building walls.*

Neighborhood Response: East not enough screening, all trees should be evergreen for year-round screening, 8' fence too solid.

Our Response: Very few shrubs, just trees, and there are several gaps in the trees. Additionally, on the long blank west façade, the shrubs are on the property line, not near the building, so they do not soften the linear building wall.

Per the buffer overlay standards, L3 is required in the b overlay on the north side. "The L3 standard requires enough high shrubs to form a screen 6 feet high. The shrubs must be evergreen." I do not see a continuous shrub screen on the north side. This may come up in Zoning plan check, but is also related to meeting the guideline D above.

E. Fencing. *Any proposed fencing is designed to be compatible with the desired character of the area and is especially sensitive to abutting residential uses. Use of rolled razor wire is discouraged.*

Neighborhood Response: No specific response

Our Response: They have proposed wood fencing, which does seem to be compatible with residential uses, though may not fit the desired character of the area where it is visible to pedestrians. An open fence would give more visual interest and view of the landscaping.

F. Security. *The perimeter of the site is designed to provide adequate security for both the site and abutting sites. Considerations include fence and wall materials and placement, type and placement of landscaping including thorny plant material and desired visibility or privacy.*

Neighborhood Response: Deep unsecured area before roll-up gate, exiting vehicles will be by driveway, open landscaped areas by fences create unsafe areas by homes.

Our Response: I don't have anything new to add here. It does seem the perimeter of the site is not secured at all, near the main entrance/roll-up gate (open parking area, but covered, so may attract transients) and the fence on the north side hugs the building instead of being on the property line. However, the L3 standard requires "When applied along street lot lines, any required or nonrequired screen, wall, or fence is to be placed along the interior side of the landscaped area."—so even if they had a nice metal open fence, it would have to be inside the 10' of plant materials. They cannot really meet both guideline F. and the L3 standard.

Thanks,

Suzannah Hamlin Stanley | Associate | Land Use Planner II
MACKENZIE. P 503.224.9560 W mcknze.com C vcard
1515 SE Water Ave, Suite 100 | Portland OR 97214

A. Key Issues Applicable to this Project/Site:

- **Note:** The following is not a full review of the project against all applicable development standards, but is a summary of instances identified in my review where, based on the level of detail provided, the project did not meet a standard, or where clarification is needed to confirm compliance with a standard. Compliance with all applicable development standards will be determined at the time of permit or land use review. Unless noted below, variations from each standard discussed could be considered through an Adjustment Review, which is a Type II land use review process. See Adjustment Review.

More detailed information on each of these topics is given below. The main issues I was able to identify based on the level of detail provided are as follows:

- Self storage facilities in c-zones require design review per 33.284.040. The applicable design guidelines are in 33.284.050.
- The portion of the site within the 'b' overlay requires a 10 foot setback with 3 feet of landscaping along all lot lines that are across a local service street from R-zoned land or that abut the rear lot line of an R-zoned lot per 33.410.040.
- The building must be more than 30 feet tall per 33.284.030.B
- SE Powell is a transit street. The transit street main entrance standards of 33.130.242 must be met
- The ground floor window standards of 33.130.230 must be met.
- The maximum number of parking spaces allowed per 33.266.115 and Table 266-2 is 18 spaces.
- Both perimeter and interior parking lot landscaping are required per 33.266.130.G.
- A minimum of 15% of the site area must be landscaped.
- A minimum setback of 11 feet is required to the neighboring residentially zoned properties to the north and west. This must contain landscaping to the L3 standard of 33.248 (explained below).

Please note that any adjustments to the standards must be processed concurrently with the design review and would need to be design review modifications, not adjustments. For example, adjusting the buffer zone landscaping standards would be processed as a modification in the design review, not as a separate land use review the only looks at the adjustment criteria as they related to the buffer zone purpose statement.

- **Development Standards**
The development standards that will apply to the potential project include, but are not necessarily limited to, those from the following chapters:
 - 33.130 Commercial Zones
 - 33.248 Landscaping and Screening
 - 33.284 Self Service Storage
 - 33.266. Parking and Loading
 - 33.410 Buffer Zone
 - Zoning code chapters are available online at <http://www.portlandoregon.gov/zoningcode>.
- **Self Service Storage 33.284**
This section provides regulations specific to self storage facilities. Per 33.284.030.B, in C zones sites for self storage buildings must have a maximum site frontage along a street of 100 feet. This limitation applies only to sites for the construction of new buildings that are 30 feet or less in height. The maximum size of individual storage areas is 500 square feet. All self storage uses to be located in newly constructed buildings must be approved through design review. The design review is processed as a Type 2 procedure. The design review fee varies based on the value of the project. The self-storage design guidelines that will be applied during the design review are as follows:

Caroline A. Richter

From: Ty K. Wyman
Sent: Thursday, February 15, 2018 11:39 AM
To: Caroline A. Richter
Subject: FW: FW: Leon Capital Project - 62nd/Powell

Another exhibit below.

From: Brent Ahrend [mailto:BAhrend@mcknze.com]
Sent: Thursday, February 15, 2018 10:29 AM
To: Ty K. Wyman <TWyman@dunncarney.com>; Suzannah Stanley <SStanley@mcknze.com>
Cc: Dennis Woods <DWoods@mcknze.com>
Subject: RE: FW: Leon Capital Project - 62nd/Powell

Ty,

Here are my traffic comments. Let me know if you have any questions or need further info or narrative assistance.

- Sight distance – a quick review of sight distance indicates ODOT standards may not be met from the 62nd Avenue approach at Powell. 35 mph posted speed requires 500 ft of sight distance. The building at 6205 SE Powell lies within the sight line. Further, there are several street trees along the north side of Powell to the east and in the median to the west, that appear to not meet ODOT's shadow diagram for sight distance.
- On-site queuing – the EA notes indicate a queuing analysis is required, but we are not aware of one being prepared.
- PBOT report – both PBOT memos address a site plan with a one-way access route through the site, with an entry on SE 62nd Avenue and exit to Powell. This does not match the current site plan, nor ODOT's memo.
- ODOT report – ODOT's memo, dated prior to the latest PBOT memo, indicates all driveways on Powell will be closed, in conflict with PBOT's memo.
- Powell access – PBOT's memo indicates an access to Powell would be provided for exiting traffic, contrary to ODOT's memo. There is also an email from ODOT addressing impacts on the neighborhood with only an access on Powell. Our review indicates having an entry on 62nd and an exit (right only) onto Powell (consistent with PBOT's review) would not have an impact on other neighborhood residential streets. Vehicles desiring to travel east on Powell after leaving the site would be able to turn right onto Powell and then use the frontage parking area located on the south side of Powell between 60th and 61st Avenues to make a u-turn and then turn right onto Powell eastbound. These turning movemnets would be safer than attempting to make a left turn from SE 62nd Avenue onto Powell given the high traffic volumes and sight distance concerns noted above.
- Vehicle circulation on-site - the building configuration appears to be tight for rental moving trucks and does not work for a passenger vehicle with a trailer. The loading bays as designed require a vehicle to back in. We noted the turning diagram provided by the applicant assumed no other vehicles were in adjacent loading spaces. The presence of a vehicle in an adjacent loading space would then require a vehicle to turn around at the north end of the site (within the buffer zone), then travel in a forward motion eastbound towards the site driveway in order to back in to the loading spaces. Requiring vehicles to turn around at the north end of the site will have noise impacts on the residential neighbors, especially when vehicles have an audible noise for reverse.

- Vehicle circulation on 62nd – vehicles exiting the site towards Powell will encroach on the northbound lane in SE 62nd Avenue, due to the narrow 24 ft existing width. While no parking is allowed between the site driveway and Powell, parking is allowed on the east side of the street north of the driveway. This will result in northbound vehicles shifting into the path of vehicles turning out of the site driveway.
- Left turns from Powell – the existing left turn lane on Powell is only 50 ft long. This may not be sufficient length for longer vehicles, including moving trucks and passenger vehicles with trailers that will visit the site. Left turn queues would spill back into the through lanes on Powell and create a safety hazard.

Brent T. Ahrend, PE
Senior Associate | Asst Department Head – Transportation Planning

MACKENZIE.

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P 503.224.9560 W mcknze.com C [vcard](#)

RiverEast Center
1515 SE Water Ave, Suite 100
Portland OR 97214

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