

DeCoursey, Jillian

From: Caroline A. Richter <CRichter@dunncarney.com>
Sent: Thursday, March 01, 2018 2:02 PM
To: Ballew, Cassie
Cc: Ty K. Wyman; Linda K. Odermott; Kristen N. Baker
Subject: Design Commission - Written Response re 3415 SE 62nd Avenue (Case File LU 17-144195 DZ)
Attachments: DCAPDX-2631733-v1-Design Commision co Cassandra Ballew re 3415 SE 62nd Avenue - Case File LU 17-144195 DZ (3-1-18).PDF

Hello Cassandra,

Attached please find Ty Wyman's written response 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.

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March 1, 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:

This follows up on my Feb. 15 letter to you. The applicant submitted that day yet another version of its site plan. We observe two material revisions in this plan (as compared to the applicant's previous submittal):

1. a roll-up door at the property line on 62nd Ave.; and
2. enhanced landscaping.

These revisions do not demonstrate compliance with the criteria applicable to the Commission's decision.

Property line door. Per the attached PBOT internal memorandum dated May 1, 2017:¹

For driveways accessing parking areas, a minimum of 20 feet of horizontal clearance will be required for the access control mechanism . . .

¹ I recall that PBOT staff asserted that provisions of Title 17 do not constitute standards applicable to the Commission's decision. As described in my Feb. 15 letter, the City appears to bifurcate its decision authority over the applicant's proposed development, limiting the Commission's jurisdiction to the criteria set forth in PCC 33.284.050. It is, nonetheless, fairly clear that the driveway depth standard described in PBOT's memo establishes a standard for implementing Chap. 6, Implementation Strategies and Regulations of the City's Transportation System Plan.



Design Commission
March 1, 2018
Page 2

The applicant says this door is to remain open from 7am to 10pm. This standard applies 24/7. (Indeed, it would seem the public imperative of avoiding queue spillback into the right-of-way is probably highest between 10pm and 7am, during which visibility is generally at its worst.) The applicant's latest design fails to comply.

Enhanced landscaping. To reiterate, 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.

This standard mandates that the applicant's building and roof design achieve a level of compatibility. It does not say "Unless mitigated by landscaping, the building and roof are designed to be compatible with surrounding development, especially nearby residential uses." The applicant cannot comply with this standard by adding landscaping; either the building and roof are compatible with the neighbors, or they are not. (Indeed, in the fact that the applicant seeks to hide the building and roof line simply suggests that those design elements are exceedingly boxy.)

I again appreciate your attention.

Very truly yours,

Ty K. Wyman

TKW:car

Enclosure

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

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PBOT

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Dan Saltzman Commissioner Leah Treat Director

TO: PBOT Development Review Staff
FROM: Lewis Wardrip, City Traffic Engineer *LW*
Kurt Krueger, Development Review Division Manager *KDK*
DATE: May 1, 2017
SUBJECT: DRP 6.02 - Access Control Mechanisms

Purpose statement:

To clarify submittal requirements for any access control mechanisms (security gates, garage doors, etc.) proposed across driveways accessing on-site vehicle areas.

Background:

Per Portland City Code 17.28.110.D "The City Traffic Engineer shall recommend such conditions and limitations regarding the location and operation of driveways as are found necessary to insure the safe and orderly flow of pedestrian, bicycles and vehicular traffic and preserve on-street parking."

Placement and operation of access control mechanisms proposed across driveways providing ingress to on-site vehicle areas should minimize queuing within the right-of-way (r-o-w) and the resulting conflicts with traffic of all modes.

It has been PBOT practice to require a 20ft minimum setback from the property line for access control mechanisms across parking lot or parking garage driveways. This is the minimum length of space needed for a passenger car to stage outside of the r-o-w while activating and opening the access control mechanism.

In 2014 PBOT started requiring queuing analyses to support all Driveway Design Exception (DDE) requests related to any proposed access control mechanisms located less than 20ft behind the property line. Thereafter, PBOT relaxed that requirement after compiling results from those analyses. For the past year, queuing analyses have been required only when the proposed driveway is located on a street with Transportation System Plan (TSP) Traffic Classification higher than Local Service Street or Local Service Street that carries more than 5,000 vehicles per day.

Adequate queuing analyses and operational information have been collected and studied allowing PBOT to provide general location/operational requirements for the majority of access



control mechanisms based on the proposed development and driveway location. An approved DDE will now be required for all proposed access control mechanisms to determine the appropriate location based on intensity of use, opening speed, and activation method. A queuing and operational analysis will be required to supplement the DDE request only where an access control mechanism provides access to a high volume parking garage or as determined necessary by the City Traffic Engineer.

DR procedure/policy:

Requirements

A DDE is required for proposed access control mechanisms associated with commercial permits regardless of location. The following information is required with the DDE request form.

- total building area
- a description and size of each of the expected building uses (retail, office, residential, etc) that will have access to the garage
- number of proposed parking spaces
- height and width of proposed security gate
- speed and/or opening time of security gate
- activation method for opening/closing the security gate
- hours that the gate will remain open, if applicable

In addition, a queuing and operational analysis prepared by a licensed Traffic Engineer in the State of Oregon is required for any access control mechanism proposed across a driveway that provides access to 100 or more parking spaces or as determined necessary by the City Traffic Engineer.

Additional Information

There are no location or operational requirements for access control mechanisms proposed across driveways that access loading spaces only or parking associated with one and two family developments (residential permits). No DDE is required in these cases.

For driveways accessing parking areas, a minimum of 20 feet of horizontal clearance will be required for the access control mechanism, vehicle ramp and/or drive aisle.

If a loading space is proposed within the parking area, the vertical clearance between the r-o-w and the loading space must meet the minimum vertical clearance requirements for the loading space provided.