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RESPONSE TO THE BUREAU OF DEVELOPMENT SERVICES LAND USE REVIEW REQUEST

Portland Transportation
Development Review
Bureau of Transportation Engineering & Development

LU: 18-190331-000-00-LU Date: November 9, 2018

To: Mark Moffett, Bureau of Development Services, B299/R5000

From: Patricia Neighbor, B106/800, 503-823-0380

Applicant: Everett House Community Healing Center *Dr Elliott Mantell* & Peter F Fry
EVERETT HOUSE COMMUNITY HEALING CENTER
2927 NE EVERETT ST
PORTLAND OR 97232

Location: 2926 NE FLANDERS ST

TYPE OF REQUEST: Type 3 procedure CU - Conditional Use

DESCRIPTION OF PROJECT

The request is for elimination of Condition B for off street parking as it is no longer necessary and clarification of Condition I regarding exterior construction. The conditional use refers to original 026-82 CU.

RESPONSE

Portland Transportation/Development Review has reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts to transportation services.

The following approval criterion applies to the subject development:

Transportation Approval Criteria
Conditional Uses 33.815.105 - Institutional and Other Uses in Residential and Campus Institutional Zones

D. Public Services

1. The proposal is supportive of the street designations of the Transportation Element of the Comprehensive Plan.

(***)

CASE NO. LU 18-190331 CU
EXHIBIT E.2

2. *Transportation system:*

   a. *The proposed use is in conformance with the street designations of the Transportation Element of the Comprehensive Plan. The transportation system is capable of supporting the proposed uses in addition to the existing uses in the area. Evaluation factors include safety, transit availability, availability of pedestrian and bicycle networks, on-street parking impacts, access restrictions, neighborhood impacts, impacts on pedestrian, bicycle, and transit circulation. Evaluation factors may be balanced; a finding of failure in one or more factors may be acceptable if the failure is not a result of the proposed development, and any additional impacts on the system from the proposed development are mitigated;*

   b. *Measures proportional to the impacts of the proposed use are proposed to mitigate on- and off-site transportation impacts. Measures may include transportation improvements to on-site circulation, public street dedication and improvement, private street improvements, intersection improvements, signal or other traffic management improvements, additional transportation and parking demand management actions, street crossing improvements, improvements to the local pedestrian and bicycle networks, and transit improvements;*

   c. *Transportation improvements adjacent to the development and in the vicinity needed to support the development are available or will be made available when the development is complete or, if the development is phased, will be available as each phase of the development is completed;*

Response: The applicant proposes to modify the existing conditional use permit (CU 26-82) to remove a requirement to provide 30 off-street parking spaces. The applicant provided a Transportation Impact Study (TIS), completed by Ard Engineering, dated September 26, 2018, to address the transportation approval criteria. As of November 11, 2017, one letter was provided by a neighbor, indicating support of removal of the condition requiring off-street parking.

Regarding the removal of off-street parking, the TIS states that it addressed "*adequacy of on-street parking in the site vicinity without leased off-street spaces.*" The most significant potential impacts of the removal of off-street parking requirements appears to be impacts to on-street parking. PBOT reviewed potential impacts to the removal of off-street parking as a condition, and evaluated those impacts from a technical perspective. PBOT's traffic engineer noted: "*Of significance, the on-street parking supply was determined to be sufficient in absorbing the loss the conditioned off street spaces. It should be noted that the Everett House Community Healing Center generates an average peak period parking demand for 29 spaces. The existing peak period for on-street parking in the vicinity is from 7:00 - 8:00 PM on Saturday, at 81.0% occupancy. Assuming the worst case scenario of all the healing center's peak period parking occurring during this timeframe, the proposed on-street parking occupancy rate increases to 84.8%; which is still below our threshold of 85 percent. Therefore, there are no detrimental impacts to the on-street parking in the vicinity."* PBOT considers 85% occupancy to be full. Therefore, given a worst-case scenario, PBOT estimates that the proposed development (removal of the off-street parking condition) complies with the approval criteria.

The approval criteria does not require the applicant to provide a Transportation Demand Management Plan. However, the TIS voluntarily addresses measures to mitigate on and off-site transportation impacts. In response to that information, note that condition F. of the Report of Hearings Officer Decision, dated June 14, 1982 **("Applicant's shall pay one-half the cost of monthly bus passes for all employees who take the bus to or from this facility on a regular basis. Transit and parking information shall be provided all users at the reception area.") was not requested to be removed, and shall remain in force as a condition.** *While the applicant proposes to pay $50 to current employees, which is 50% of the current cost of a monthly transit pass, the applicant is not relieved from the requirement to pay one-half of the cost of future transit passes should the rate increase in the future.*

The Transportation Impact Study that was provided addresses the transportation approval criteria. PBOT concurs with the assertions of the TIS, below:

VICINITY STREETS AND INTERSECTIONS

NE Glisan Street is classified by the City of Portland as a Neighborhood Collector, a Community Main Street, a City Walkway, a City Bikeway, a Transit Access Street, a Local Service Truck Street and a Minor Emergency Response Route. It has a posted speed limit of 30 mph with one motor-vehicle travel lane and one bicycle lane in each direction, a center two-way left-turn lane, and on-street parking on both sides of the roadway. Curbs and sidewalks are also in place on both sides of the roadway.

E Burnside Street is classified by the City of Portland as a District Collector, a Community Main Street, a City Walkway, a City Bikeway, a Major Transit Priority Street, a Truck Access Street, and a Major Emergency Response Route. It has a posted speed limit of 30 mph with two eastbound motor vehicle travel lanes and one westbound motor vehicle travel lane. It has a center two-way left-turn lane, and on-street parking is available on both sides of the roadway.

NE 28th Avenue is classified by the City of Portland as a Neighborhood Collector, a Local Service Street, a City Bikeway, a City Walkway, a Transit Access Street, a Local Service Truck Street and a Major Emergency Response Route. It has a posted speed limit of 20 mph, with speed humps placed at intervals to limit through travel speeds. It has one motor vehicle travel lane in each direction, with on-street parking, curbs and sidewalks provided on both sides of the roadway.

NE 32nd Avenue is classified by the City of Portland as a City Walkway and a City Bikeway. It is classified as a local service street for all other travel modes. It has a two-lane cross-section without centerline striping and a posted speed limit of 25 mph. On-street parking, curbs and sidewalks are provided on both sides of the roadway. Speed humps are in place in the vicinity of E Burnside Street for traffic calming.

NE Couch Street and NE 30th Avenue are classified by the City of Portland as a City Bikeway and as a local service street for all other travel modes. They have two-lane cross-sections without centerline striping and posted speed limits of 25 mph. On-street parking, curbs and sidewalks are provided on both sides of the roadway.

All other streets in the site vicinity function as local roadways with on-street parking, curbs and sidewalks on both sides of the roadway and 25 mph statutory residential speed limits. The roadways accommodate two-way traffic without centerline striping.

TRIP GENERATION

To estimate the average number of trips generated by the existing conditional-use facility over time, trip rates from the manual *TRIP GENERATION*, Tenth Edition, published by the Institute of Transportation Engineers (ITE) were used. The trip rates used were those for land-use code 720, *Medical-Dental Office Building*, since this is the closest corresponding use in the ITE Trip Generation Manual and results in a conservative analysis. Based on the gross floor area of 9,145 square feet, a total of 27 trips are projected during the morning peak hour, with 21 vehicles arriving and 6 vehicles departing the site. During the evening peak hour 33 trips are projected, with 9 entering and 24 departing the site. A weekday total of 264 site trips is expected with half entering and half exiting the site.
The table below offers a summary of the trip generation calculations. A detailed trip generation worksheet is also included in the attached technical appendix.

TRIP GENERATION SUMMARY

	Morning Peak Hour			Afternoon Peak Hour			Evening Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
Medical Office									
9,145 square feet	21	6	27	9	24	33	132	132	264

PARKING GENERATION

To estimate the total parking demand generated by the existing conditional use, parking rates from the manual *PARKING GENERATION*, Fourth Edition, published by the Institute of Transportation Engineers (ITE) were used. The parking demand rates used were those for land-use code 720, *Medical-Dental Office Building*. Parking demands were again evaluated based on the gross floor area of the existing facility.

A typical medical office with 9,145 square feet of floor area would be projected to generate a daily peak parking demand of 29 spaces. For medical/dental office facilities, this peak demand typically occurs between 2:00 and 3:00 PM. A detailed parking generation worksheet is included in the attached technical appendix.

PARKING GENERATION SUMMARY

	Typical Daily Peak Parking Demand
9.145 sf Medical Office	29

**(***)

SAFETY

To evaluate motor vehicle safety, crash data was obtained from the Oregon Department of Transportation's Crash Analysis and Reporting Unit. The data obtained was for the most recent three years available, from January 2014 through December 2016. Crash data was examined for the intersections of NE 29th Avenue at NE Glisan Street, NE 30th Avenue at NE Glisan Street, NE 28th Avenue at NE Flanders Street, and NE 28th Avenue at NE Everett Street, which are the intersections most likely to be used by site trips to access the major streets in the site vicinity. Crash data was also examined for the nearby signalized intersections of NE 28th Avenue at NE Glisan Street and NE 32nd Avenue at NE Glisan Street.

The intersection of NE 28th Avenue at NE Glisan Street had 6 reported crashes during the three-year analysis period. These included five turning-movement collisions and one rear-end collision. Two crashes resulted a report of a "possible injury/complaint of pain". The other crashes resulted in property damage only.

The intersection of NE 29th Avenue at NE Glisan Street had 4 reported crashes during the three-year analysis period. These included two rear-end collisions and two angle collisions. The crashes resulted in one non-incapacitating injury and five reports of a "possible injury/complaint of pain".

The intersection of NE 30th Avenue at NE Glisan Street had 2 reported crashes during the three-year analysis period. These included one rear-end collision and one sideswipe-overtaking collision. The crashes resulted in property damage only.

The intersection of NE 32nd Avenue at NE Glisan Street had 3 reported crashes during the three-year analysis period. These included two rear-end collisions and one angle collision. The crashes resulted in property damage only.

The intersection of NE 28th Avenue at NE Flanders Street had one reported crash during the three-year analysis period. It was a non-collision in which a motorcycle overturned while traveling at high speed, resulting in incapacitating injuries to the rider.

The intersection of NE 28th Avenue at NE Everett Street had two reported crashes during the three-year analysis period. These included one turning-movement collision and one angle collision. The crashes resulted in one report of a "possible injury/complaint of pain".

Based on the crash data, the study area intersections are currently operating acceptably with respect to safety. No significant crash hazards were identified, and no specific safety mitigation is recommended.

As is detailed on page 9 under "Availability of Pedestrian and Bicycle Networks", the surrounding street system has a well-connected network that is capable of safely serving pedestrians and people on bicycles both in the immediate site vicinity and for connections to the larger surrounding transportation system.

Based on the analysis, the transportation system in the site vicinity can safely accommodate all modes of transportation and is adequate for the conditional use in addition to the other uses in the vicinity.

STREET CAPACITY AND LEVEL OF SERVICE

In order to evaluate the operation of area streets and intersections, observations were conducted during the weekday morning and evening peak hours. The area evaluated extends from NE 28th Avenue to NE 32nd Avenue and from E Burnside Street to NE Glisan Street.

For purposes of evaluation, the four higher-volume streets that form the limits of the evaluated area were considered individually, while the lower-volume local streets internal to the study area which operate similarly were considered collectively. The fours signalized intersections within the study area were also evaluated individually.

The local streets internal to the described area (NE 29th Avenue, NE 30th Avenue, NE 31st Avenue, NE Couch Street, NE Davis Street, NE Everett Street and NE Flanders Street) generally operate well within capacity and with high levels of service (ranging from LOS A to LOS B). On-street parking is generally permitted on both sides of the streets, resulting in a narrow effective travel way that provides for traffic calming, ensuring low travel speeds while safely accommodating through traffic. In many instances, vehicles must pull to the side in order to allow traffic traveling in the opposite direction to pass. Operation of such "queuing streets" serves both to reduce through travel speeds and volumes, since vehicles without a destination in the neighborhood typically will not utilize the local streets for cut-through travel. Speeds limits on these streets vary from 20 mph to 25 mph.

Local street intersections within the aforementioned study area operate under a mix of two-way stop control and four-way stop control. Based on the low volume of entering traffic, these intersections operate at level of service A during the peak hours, with the primary source of delay being the need to stop at stop signs. Even when multiple vehicles arrive at intersections simultaneously, delays are very brief and typically consist of waiting for no more than 1-2 vehicles to pass through the intersection prior to entering.

NE 28th Avenue accommodates moderate traffic volumes in each direction, with traffic generally traveling slowly both due to the posted 20 mph speed limit and occasional conflicts with pedestrians crossing the street, bicycles in the roadway, and motor vehicles maneuvering in and out of parking spaces. Despite these brief interruptions, the roadway operates with little overall delay and well within capacity. Unsignalized intersections between NE Glisan Street and E Burnside Street operate with relatively low delays during the peak hours, although side-street vehicles occasionally need to wait for through queues to pass before entering the intersections. These unsignalized intersections operate at level of service C or better during the morning and evening peak hours.

NE 32nd Avenue operates with somewhat higher traffic volumes than most local streets in the site vicinity due to the presence of traffic signals at both NE Glisan Street and E Burnside Street. However, the volumes of traffic are still very low along this corridor, with the stop-controlled intersections between NE Glisan Street and E Burnside Street operating at level of service B or better during the peak hours.

NE Glisan Street carries moderate traffic volumes, with the highest volumes of traffic traveling westbound during the morning peak hour and eastbound during the evening peak hour. The observed traffic volumes remain well within the carrying capacity of a single travel lane in each direction. The unsignalized intersections along NE Glisan Street between NE 28th Avenue and NE 32nd Avenue operate well within capacity, and at level of service C or better.

E Burnside Street carries moderately high directional traffic volumes, with the majority of traffic again traveling westbound during the morning peak hour and eastbound during the evening peak hour. In order to more efficiently serve these directional traffic peaks, a second eastbound travel lane is provided, and the westbound right-turn lane at NE 28th Avenue which accommodates on-street parking during the majority of the day is restricted during the morning peak hours to better accommodate the higher volume of westbound traffic during this time. The unsignalized intersections along E Burnside Street between NE 28th Avenue and NE 32nd Avenue operate within capacity and with low to moderate delays for the stop-controlled movements, at level of service D or better during the peak hours.

The intersection of NE 28th Avenue at NE Glisan Street is controlled by a traffic signal. The northbound and southbound

approaches each have a single, shared lane for all turning movements. The eastbound and westbound approaches each have a left-turn lane and a shared through/right lane. During the morning and evening peak hours, the intersection was observed to operate within capacity and at level of service D or better.

The signalized intersection of NE 32nd Avenue at NE Glisan Street has a single, shared travel lane for all turning movements on each of the four intersection approaches. During the morning and evening peak hours the intersection was observed to operate well within capacity and at level of service B/C.

The intersection of NE 28th Avenue at E Burnside Street is also controlled by a traffic signal. The northbound and southbound approaches each have single shared travel lane for all turning movements. The westbound approach has a left-turn lane, a through lane, and a right-turn lane. The eastbound approach has a left-turn lane, a dedicated through lane and a shared through/right lane. During the morning and evening peak hours, the intersection operates within capacity and at level of service D or better.

The signalized intersection of NE 32nd Avenue at E Burnside Street has a single, shared travel lane for all turning movements on the northbound and southbound approaches. The westbound approach has a left-turn lane and a shared through/right lane. The eastbound approach has a left-turn lane, a dedicated through lane, and a shared through/right lane. During the morning and evening peak hours, the intersection was observed to operate well within capacity and at level of service C or better.

Based on the operational observations, all study streets and intersections are currently operating within capacity and with acceptable levels of service. Since the subject use was in operation during the observations, no additional traffic is anticipated upon renewal of the conditional-use permit. Accordingly, the study area streets and intersections are projected to continue to operate acceptably upon renewal of the conditional-use permit. No operational mitigations are necessary or recommended.

CONNECTIVITY

The street grid in the immediate site vicinity is complete, with direct connections to major streets traveling both north/south and east/west.

Sidewalks are provided on both sides of all area streets, and marked crosswalks are available crossing higher-volume streets in the site vicinity.

Most area streets accommodate low traffic speeds and volumes and can be safely shared between motor vehicles and bicycles. Several vicinity streets have sharrow markings to reinforce the message that bikes may share the roadway, and bike lanes are provided in both directions along NE Glisan Street.

Based on the analysis, connectivity is favorable for all travel modes.

TRANSIT AVAILABILITY

Tri-Met Routes 19 and 20 operate in the site vicinity on NE Glisan Street and E Burnside Street, respectively. These bus lines provide service to Downtown Portland as well as the Gateway Transit Center and beyond 7 days per week. The nearest bus stops are located on NE Glisan Street immediately east of NE 30th Avenue and on E Burnside Street west of NE 28th Avenue.

Adequate transit service is available for both patrons and employees of the subject site, as well as the other uses in the site vicinity.

AVAILABILITY OF PEDESTRIAN AND BICYCLE NETWORKS

Continuous sidewalks are provided on both sides of the roadways within the study area. The low-volume local intersections and streets can be safely crossed without the need for marked crosswalks or pedestrian signals. The signalized intersections that form the four boundary corners of the study area each have pedestrian signals and marked crosswalks for all four legs of the intersections. Additionally, enhanced pedestrian crossing treatments are provided on NE Glisan Street at NE 30th Avenue and on E Burnside Street at NE 30th Avenue. The existing pedestrian facilities are capable of safely accommodating pedestrians traveling throughout the study area, as well as transit and motor-vehicle users as they walk between bus stops or parking spaces and their ultimate destinations.

The local streets within the study area consist of low-speed roadways accommodating very low to moderately low traffic volumes.

Bicycles can safely share these roadways with motorized traffic. Bike lanes are in place along both side of NE Glisan Street in the site vicinity, providing east/west connectivity. An additional east/west connection is provided one block south of E Burnside Street along SE Ankeny Street, which is a Neighborhood Greenway with sharrow markings and speed humps for traffic calming. NE 32nd Avenue is designated as a Shared Roadway, with low volumes of low-speed traffic. NE 30th Avenue also provides a usable north/south connection for bicycles due to the enhanced crossing treatments provided at NE Glisan Street and at E Burnside Street. These streets provide connections to the surrounding city's bicycle network.

Based on the analysis, adequate pedestrian and bicycle networks are available within the site vicinity. No mitigations are necessary or recommended.

ON-STREET PARKING IMPACTS

In order to evaluate the operation of area streets and intersections, observations of on-street parking demands were conducted during a mid-week day and a Saturday between the hours of 11:00 AM and 11:00 PM. The study area was bounded by NE Glisan Street, E Burnside Street, NE 28th Avenue and NE 32nd Avenue. Due to the higher volumes of traffic on NE Glisan Street and E Burnside Street, only the near sides of these streets were included in the parking study.

There were a total of 743 on-street parking spaces observed within the study area. The maximum occupancy occurred between 7:00 and 8:00 PM on a Saturday, when 601 vehicles were observed to be parked within the available on-street spaces. This equates to an overall parking occupancy of 81 percent.

The parking observations included parking demands from the Everett House, since it is currently in use and has no off-street parking available. Notably, the observations showed that even during the peak demand hours there was always more than one block face within one block of the subject property that had less than 60% occupancy. Adequate on-street parking was continuously available throughout the weekday and weekend periods of operation of the facility. Accordingly, there is adequate on-street parking to safely meet the demands of the site in addition to the demands of the other uses in the site vicinity.

ACCESS RESTRICTIONS

There are currently no restrictions on access in the site vicinity, and none are needed to maintain safe operation with continued approval of the subject use.

NEIGHBORHOOD IMPACTS

The Everett House Community Healing Center has been in continuous operation since 1977, when it operated under a home occupational permit. It has operated under a conditional-use permit since 1981. Renewal of the conditional-use permit for the site will maintain conditions similar to those experienced over the past few decades and is not projected to result in any significant impacts to the surrounding neighborhood.

IMPACTS ON PEDESTRIAN, BICYCLE AND TRANSIT CIRCULATION

As described previously, the existing transportation network in the site vicinity provides safe connections for transit users, pedestrians, bicycles, and motor vehicles. Continued use of the of subject property will not impact circulation for any travel mode.

MEASURES PROPOSED TO MITIGATE ON- AND OFF-SITE TRANSPORTATION IMPACTS

Although each of the evaluation factors described in Section 33.815.105.D.2.A are satisfied, the proposed conditional use includes Transportation Demand Management measures to reduce the impact of site trips on both traffic demand and parking demand in the site vicinity.

As described in the Transportation Demand Management plan provided under separate cover, the Everett House Community Healing Center will use information, facilities and incentives to minimize transportation and parking impacts on the surrounding community. These include:

- Making transit schedules and Bike + Walk Maps available at the site;
- Providing information regarding discount/incentive policies as well as relevant links for alternative travel

mode resources within the Everett House email newsletters and website.

- Providing secure bicycle parking is available within the site (10 total spaces);
- Providing a $50/month credit is offered for employee bus passes; and
- Providing a 15% discount to members and patrons that walk, bike, use public transit, or use ridesharing when visiting the site.

TRANSPORTATION IMPROVEMENT AVAILABILITY

Since each of the evaluation factors described in Section 33.815.105.D.2.A is currently satisfied and will remain satisfied with continued operation of the proposed conditional use, the transportation improvements adjacent to the development and in the vicinity needed to support the development are available and will continue to be available in the future.

Street Classification & Code/Title 17 Requirements

1. **Transportation System Plan (TSP) Classifications:** NE Flanders and NE Everett at this location are classified by the TSP as Local Service Streets for all modes.
2. **Existing Conditions:** NE Flanders and NE Everett at this location are improved with paved roadways of approximately 28-ft and 16-ft sidewalk corridors, within 60-ft right-of-ways. Improvements at the subject location appear to exceed the City standards.
3. **Standard Improvements:** Portland's *Pedestrian Design Guide* specifies that standard improvements at this location on NE Flanders and NE Everett at this location include an 11-ft sidewalk corridor to consist of a 0.5-ft, 4-ft furnishing zone, 6-ft sidewalk, and 0.5-ft frontage zone. The existing sidewalk corridors, including the sidewalks, on NE Flanders and NE Everett appear to be wider than the current City standard. **Therefore, the applicant is not required to reconstruct the existing sidewalk corridors to comply with current City standards.**
4. **Dedication:** No dedication is required in relation to the proposed development.

Transportation System Development Charges (Chapter 17.15) may be assessed for this development. The applicant is advised to leave a voicemail message to include the case file number, at (503) 823-7002, Option 2. Additional information about PBOT SDCs can be located at this link: https://www.portlandoregon.gov/transportation/46210

Driveways and Curb Cuts (Section 17.28)
Curb cuts and driveway construction must meet the requirements in Title 17. The Title 17 driveway requirements will be enforced during any future review of building permits.

Encroachments in the right-of-way must be approved through the encroachment permit process prior to PBOT approval of the building permit. For more information, go to:
http://www.portlandoregon.gov/transportation/encroachments

RECOMMENDATION

PBOT has no objection to the subject request for Conditional Use, to remove condition B of the prior Conditional Use Permit (26-82), thereby allowing the removal of off-street parking.

All existing conditions of CU 26-82 shall remain in force, as specified above.