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Comments on Proposed Amazon Corner Development Land Use Applications ARA 16- 017 and TIA 16- 007, Part 1

These comments are provided on behalf of the Friends of Eugene in response to two applications submitted to the City of Eugene for the proposed Amazon Corner development. The following comments address Adjustment Review Application ARA 16-017 and Traffic Impact Analysis TIA 16-007.

The initial reaction of the neighborhood to a mixed use development at this site was generally positive. However, now that the large scale of the proposed development is known, it has raised concerns about the traffic that would be generated and the compatibility of such a large and tall building with the surrounding neighborhood. We believe the scale of the proposal could be reduced to produce a more compatible and harmonious development.

Adjustment Review

Application Completeness – Site Plan

The proposed site plan is based on the use of an underground parking facility with 60 spaces in combination with 99 surface parking spaces, to provide adequate on-site parking. We have no objection to the underground (below-grade) parking, and consider it to be a desirable and essential element of the

overall design. However, we do have concerns that it may not be viable in this area due to the high water table during much of the year. If underground parking is not viable, the site plan would require significant changes. **Therefore we request a determination by a qualified professional that below-grade underground parking is viable and an explanation for how it would be maintained in a safe and dry condition in the event of heavy rains and possible power failures.**

The proposed site plan does not clearly show the proposed building projections into the setback area beyond the building footprint. These projections may affect the streetscape and are therefore an essential part of landscaping, pedestrian orientation, building setbacks, and building frontage that should be considered as part of this adjustment review. **We request that the site plan be modified to show the amount of all building projections beyond the footprint. This could be accomplished with a colored dashed line, or similar indication. A 3D rendering would be highly desirable to assist the general public in visualizing and comprehending the proposal.**

Relevant code is EC 9.8030(2)(a)

- (1) Contributes to the continuity of building facades along the street.***
- (2) Creates an attractive pedestrian environment along all adjacent streets.***

Other Issues

Applicant is requesting a variance from:

EC 9.5500(11)(b)(2) Parking drives for multiple-family developments with more than 20 units shall be designed so as to permit no through-motor vehicle movements.

This change may result in "cut-through" traffic and other problems and the Applicant has not provided a clear and sufficient justification for a variance. Speed bumps and other traffic calming devices could be added to this design to minimize cut-through traffic.

Applicant is requesting a variance from parking lot design standards for required islands between parking areas. The revised site plan (dated 12/15/16) appears to show a reduced landscape buffer area around parking areas. This creates

additional area shown in white in the site plan, which we assume is paved. The result is a reduced buffering around parking and around interior of site around buildings, which seems undesirable for aesthetics, buffering from adjacent single-family homes, and pedestrian movement.

Applicant is seeking a variance for the requirement to provide parking islands of 20 feet in width to separate parking areas (EC 9.5500(12)(b)(3)). First, we believe that the parking area calculations need to include all paved surfaces. The revised site plan only includes "blue" areas in calculating parking area. "White" areas shown around parking stalls should also be included as parking area, unless another designation and function is applied in the site plan. As depicted, the parking area appears to be a single parking court, or at most, two courts, which exceeds the 9,000 sq.ft. maximum. With the area calculations corrected to include all paved parking surfaces, we believe that site plan does not provide adequate buffering or grouping of traffic courts to be a suitable alternative to the code requirements.

Traffic Impact Analysis

Traffic generation by a project of this scale (108 residential units and 14,000 sq.ft of retail space) is the single greatest concern of the neighborhood. The area already experiences significant congestion which currently exceeds city standards in numerous locations. Residents of the area could experience a significant loss of mobility due to this project if the scale of the development is not reduced or mitigation measures increased. For one example, existing residents seeking to access Hilyard Street from the west side via E 33rd or E 31st already experience significant difficulty and delay. Hilyard is a critical north-south connection for much of South Eugene and there is no other alternative route other than the highly congested Willamette Street. Increased congestion here will cause spillover and ripple effects in a much larger area.

Baseline Traffic Data is Inadequate

In reviewing the TIA, it is impossible to determine the factual source of the data for existing traffic, upon which the analysis is based. Data for multiple intersections are reported in the TIA, but the original source of the traffic counts is not provided. We do not believe that theoretical model data, nor any historic counts more than six months old should be used for representing traffic in this area. **We are requesting actual, recent traffic counts using physical traffic**

counters be collected for all study intersections.

We see that a “video analysis” was used for the Hilyard and 30th intersection. Is this a completely objective, verifiable, and accurate basis for characterizing this intersection? If so, **we would like the actual video and original traffic counts to be entered into the record as part of the TIA so that we may independently verify its accuracy.**

Minimum standards for the TIA are established in **Administrative Order No. 58-02-02-F. Section R-9.8650-F(4.1)** requires actual traffic counts on an hourly and daily basis for all streets and intersections in the study area. No daily figures are provided in the TIA and we see no evidence that actual traffic counts have been collected. **Section R-9.8650-F(5)** requires traffic counts for morning peak periods as well as evening peaks.

Expand Scope of TIA to Include Larger Area

We recognize that the TIA scope is established partly by the discretion of the City Traffic Engineer and that, while there is a minimum scope required, there is no maximum scope. The current TIA appears to represent the absolute minimum analysis. Given the large scale of this project and the heavy congestion currently experienced in this area, the additional traffic generated will have significant impacts on surrounding streets and intersections. We believe that the scope of the TIA is therefore inadequate and needs to be expanded to include a larger area in order to adequately reflect the actual traffic impact area. The purpose statement for the Traffic Impact Analysis Review in Eugene Code 9.8650 (cited below) clearly states that **significant amounts of traffic** and **traffic problems** are included in the scope of a TIA. This purpose statement is also directly referred to in the Approval Criteria in 9.8680(1) and is therefore a requirement.

9.8650 Purpose of Traffic Impact Analysis Review. The purpose of Traffic Impact Analysis Review is to ensure that developments which will generate a significant amount of traffic, cause an increase in traffic that will contribute to traffic problems in the area, or result in levels of service of the roadway system in the vicinity of the development that do not meet adopted level of service standards provide the facilities necessary to accommodate the traffic impact of the proposed development.

The scope of the study area also needs to be expanded to comply with the

minimum standards for the TIA established in **Administrative Order No. 58- 02-02-F**. Section R-9.8650-F(8) lists the minimum transportation system included in the TIA. Section 8.1.2 states that this must include: ***All streets and intersections that provide direct access to or from the development, regardless of the generated volume of traffic.***

At a minimum, the study area to be included in the traffic impact analysis should be expanded to include:

- 1. Intersection of E 32nd and Alder Street**
- 2. Traffic levels on Alder between E 32nd E 30th**
- 3. Intersection of Alder and E 30th**
- 4. Intersection of Hilyard and E Amazon/ E 33rd (all directions)**
- 5. Traffic levels on E 33rd from Hilyard to Donald (including ADT)**
- 6. Intersection of E31st and Ferry Street**
- 7. Intersection of E 33rd and Ferry Street**

These additional areas should be included because traffic in this area is already so congested that the new travel demand generated by the proposed development will seek out and utilize all available alternative routes, including neighborhood streets. In addition, existing travel demand will be displaced and forced to seek alternative routes to avoid the increased congestion. **Both site-generated traffic and displaced traffic should be evaluated.**

We believe the intersection of Hilyard and E Amazon/ E 33rd is already exceeding standards during certain times of day, especially morning rush hour, so this proposed development's impact on this intersection needs to be analyzed closely. As noted later in these comments, overflow traffic onto neighborhood streets will generate safety problems that should be addressed in the TIA. Also, as noted later in these comments, there is a major bike path on Hilyard Street, a main on-street bike route on Alder Street, and a critical connection between the two on E 32nd that should be addressed under pedestrian and bicycle safety issues under EC 9.8670(2). Furthermore this area is designated as a ***safe route to school*** for four elementary schools. **For all of these reasons, the scope of the TIA must be expanded.**

The diagram used to show trip distribution is an overly-simplistic diagram that is inaccurate, not to scale, and misleading. A TIA should be required to provide an accurate base map as part of such diagrams. **We would like to see bike paths, waterways, on-street bikeways, and safe school routes (i.e., Alder Street)**

clearly indicated and labeled with accurate spatial representations.

Expand Scope to include AM Peak and School Safety

The scope of the TIA also needs to be expanded to consider the AM peak traffic period. Analysis and traffic counts for the morning peak periods are required by **Administrative Order No. 58- 02- 02-F, Section R-9.8650-F(5.1)**. This is also necessary because the area includes a number of schools that generate considerable morning traffic that coincides with the morning rush hour in the 7:30am to 8:30am period. These schools include four public elementary schools and a middle school: Charlemagne, Ridgeline Montessori, Camas Ridge, and Edgewood elementary schools, and Spencer Butte middle school. In addition to the morning traffic generated by these schools in the form of automobile trips, there is also traffic generated by children with and without parents travelling by bike and on foot. Alder and E 32nd are part of the city's "safe routes to schools" and should receive special attention in the TIA to assure that pedestrian and bike safety are maintained, if not improved. No consideration is given to this in the TIA. Pedestrian and bike safety are specifically mentioned in Eugene Code

9.8670 Applicability. Traffic Impact Analysis Review is required when one of the conditions in subsections (1) – (4) of this section exist

(2) The increased traffic resulting from the development will contribute to traffic problems in the area based on current accident rates, traffic volumes or speeds that warrant action under the city's traffic calming program, and identified locations where pedestrian and/or bicyclist safety is a concern by the city that is documented.

Inadequate Mitigation Proposed

While we have indicated that the scope of the TIA needs to be expanded to include a larger impact area, AM peak traffic flows, and school safety (as noted above), the following comments regarding mitigation are based solely on the existing TIA and Code criteria under EC 9.8650 and EC 9.8680(1) and (2). Specifically, the purpose statement of EC 9.8650, which is referenced specifically under "Approval Criteria" in 9.8680(1), states:

9.8650 Purpose of Traffic Impact Analysis Review. The purpose of Traffic Impact Analysis Review is to ensure that developments which will

generate a significant amount of traffic, cause an increase in traffic that will contribute to traffic problems in the area, or result in levels of service of the roadway system in the vicinity of the development that do not meet adopted level of service standards provide the facilities necessary to accommodate the traffic impact of the proposed development.

The above purpose statement is specifically referenced in the approval criteria cited below, which also indicates the types of mitigation (improvements) that are required:

9.8680 Approval Criteria. The planning director shall approve, conditionally approve, or deny an application for Traffic Impact Analysis Review following a Type II process, or as part of a Type III process when in conjunction with a CUP or PUD. Approval or conditional approval shall be based on compliance with the following criteria:

(1) Traffic control devices and public or private improvements as necessary to achieve the purposes listed in this section will be implemented. These improvements may include, but are not limited to, street and intersection improvements, sidewalks, bike lanes, traffic control signs and signals, parking regulation, driveway location, and street lighting.

Mitigation is also specifically required in the Administrative Order No. 58- 02- 02-F, Section R-9.8650-F(9)

9. Meeting Minimum Level of Service and Safety Standards. The traffic study shall identify mitigation measures to meet a minimum level of service and safety standards. The TIA shall state whether the applicant will have the mitigation measures in place at the time of occupancy of the properties, or if a financial commitment is in place to complete the necessary infrastructure within a reasonable length of time from the approval date of the development.

The mitigation proposed at E 31st Avenue and Hilyard Street is restriping only. This will not provide sufficient mitigation and is inadequate. Traffic cuing here will cause more problems as the Amazon Bike Path crossing will potentially be blocked and pedestrian and bike safety could be impacted. This intersection needs a traffic refuge (median) so that vehicles turning north onto Hilyard from E 31st can safely cross one side of Hilyard without having to wait for both side to be available for crossing. A pedestrian refuge is also needed here for the same

reason, as this intersection is a popular crossing for those shopping at Albertsons.

No mitigation is proposed at E 32nd and Hilyard where vehicles making a left turn from E 32nd onto Hilyard southbound are already having great difficulty (as noted in the TIA). The recommendation of the TIA is to prune hedges to 12 inches to improve visibility. This is not adequate. The limiting factor for this maneuver is the need to have both lanes of Hilyard clear before attempting the left turn. Further analysis in the TIA is required to determine how many such turns could possibly be accomplished in a peak hour. The TIA indicates that 17 additional southbound left turns from E 32nd would be added to the existing level, for a total of 58 turns during the PM peak. Is this even possible? The TIA does not appear to consider the fact that these left turns from E 32nd will also conflict directly with the 118 left turns from southbound traffic on Hilyard onto E 32nd (52 of which are generated by the development). The inability of vehicles to make this left turn from E 32nd will likely cause significant cuing which may affect both left and right turns. **The dedicated left turn lane on the E 32nd entrance onto Hilyard must be maintained and possibly lengthened. A median refuge on Hilyard at E 32nd would greatly facility this movement and should be evaluated as a mitigation option. The TIA should address the conflict between southbound left turns from Hilyard onto E 32nd and westbound left turns from E 32nd onto Hilyard, as noted above.**

The inability of traffic from the proposed development to move south or west from the site is likely to generate use of alternative routes on neighborhood streets. Taking E 32nd to Alder Street north to E 30th and then turning south on Hilyard is one of the movements that can be anticipated, but is not included in the TIA. Taking Alder Street to E 30th to go west on Amazon Parkway is another likely alternative route from the proposed development. Using Alder street for westbound movements onto E 30th can also be reasonably anticipate, but is also not included in the TIA. **These are clear reasons why the Alder/E32nd and Alder/ E 30th intersections need to be included in the TIA and the traffic volumes on this section of Alder need to be evaluated. Installation of traffic calming on this section of Alder Street may be needed to mitigate traffic increases from the proposed development.**

A further problem resulting from the difficulty moving southward from this site is that E 31st may become an alternate route for both southbound and westbound traffic. Consider a resident of the proposed development desiring to go to the post office who doesn't want to wait for the very difficult left turn out of E 32nd onto Hilyard to reach E 33rd. The obvious alternate route would be to head north

on Hilyard about 25 feet, and take left onto E 31st west to cut back to 33rd via Ferry Street or Willamette. This is almost a direct route on neighborhood streets. So, if the southbound traffic flow issues from this site are not resolved, it could have severe impacts on neighborhood streets that are not addressed in the TIA. **This is another reason that mitigation at E 32nd and Hilyard is necessary. It is also a reason that mitigation on Ferry Street should be considered. Ferry is a narrow neighborhood street that has no sidewalks. Therefore, pedestrians and bicyclists who rely on Ferry Street as a primary north-south travel route will be endangered by traffic increases. Mitigation could include adding sidewalks to Ferry Street between E 31st and E 33rd or adding traffic calming devices that are pedestrian and bike-friendly.**

Some of the southbound traffic from the proposed development will go south and west to E 33rd Avenue. This might be as high as 50% of southbound trips, since 33rd reaches the post office, Willamette Street, and Donald Street. East 33rd street has historically had more average daily vehicle trips (ADT) than meets the standard for its designation as a *neighborhood collector*. This is why traffic calming was originally placed on this street. The use of traffic calming on E 33rd caused cascading traffic problems on all the nearby parallel neighborhood streets (E 34th, E 32nd, and E 31st), which subsequently all required traffic calming as well. **The TIA should address potential impacts on traffic volume on E 33rd Avenue and determine what mitigation is required to avoid further overloading of this street and the other parallel neighborhood streets.**

As we have mentioned, the TIA does not address the fact that Alder Street is a bike route, or that E 32nd from Hilyard to Alder is part of the Safe Routes to School. The Alder Street bike route is critical for accessing both Charlemagne and Camas Ridge Elementary schools and the E 32nd connection is essential for eastbound and westbound bike traffic to/from Alder Street. Greater vehicle traffic in this area will impede safe use of the bike route. **Mitigation in this area should include a possible bike lane on both sides of E 32nd between Hilyard and Alder. Mitigation should also include improved bike and pedestrian crossing of Hilyard at E 32nd.**

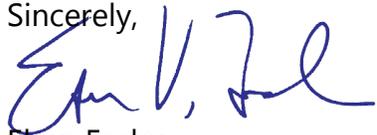
The TIA has not addressed transit service. **Since there is an LTD bus stop located on Hilyard Street alongside the proposed development, the City should seek a referral to LTD to see if a turnout lane should be added to this location, along with a possible expanded shelter.**

We believe we have raised a number of major and fundamental issues that clearly

demonstrate that the current TIA is inadequate to assure functionality and safety in the area and will not assure that current traffic standards are met. Additional study and mitigation will be required to assure that the transportation system functions as intended and the proposed development does not have seriously detrimental impacts on local mobility and neighborhood streets.

Your careful consideration of these issues will be greatly appreciated. Please refer these comments to the City Traffic Engineer, the City Planning Director, and LTD, and consider requesting input from the 4J School District regarding potential impacts to the Safe Routes to School program affecting five of our public schools.

Sincerely,



Eben Fodor
Principal