

# MEMORANDUM

DATE: 06/25/2024

TO: City of Banks Planning Staff

CC: Max Bondar, David Weekley Homes  
Dave Cady, David Weekley Homes

FROM: Stacy Connery, PCD  
Jaki Hunt, PCD  
Peyton James, PCD  
Matt Hughart, Kittelson & Associates, Inc.

RE: Agency Comments- Sunset View Master Planned Development

ENCLOSURES:

Exhibit A Updated Preliminary Plan Set

Exhibit B Revised TIA

Exhibit C Confederated Tribes of the Grand Ronde- street name approval

**Kennedy-Jenks**

**Development Code 151.126 (M)(1): The City would consider an exception to the 12 ft driveway width requirement.**

**Public Works Design Standards 2.20.11 (g): The City would consider an exception to the minimum 10 ft driveway spacing (see following)**

**Development Code 151.205: The City will not consider an exception to the vision clearance triangle minimum dimension 20 feet in length.**

**1. The City will consider an exception to the minimum density requirement if it enables the clear vision triangle dimensions to be met.**

**Response:** The applicant has reviewed alternatives to address concerns regarding the vision clearance triangle and has decided to modify how the driveways are provided on the corner lots and has slightly shifted side lot lines. Updated plan sheets are provided that comply with the vision clearance triangles. The Applicant removes their request for waiver of the vision clearance triangle standards as the lots have since been shifted to comply with the triangle dimensions. See the enclosed Site plan exhibit for compliance. The applicant will not be utilizing the suggested exception to minimum density.

**2. Two-car wide driveways will be considered up to 18 feet wide, which further reduces the spacing between driveways. Two-car driveway/garage combinations are typical for new townhouse developments and provide more space for cars. 18-foot wide driveways are recommended with 16-foot wide minimum allowable where constrained. [added by Randy Johnson, DKS, 4/21/24]**

**Response:** The proposed two-car driveways are the 16-foot wide minimum, see the enclosed Exhibit A Site Plan sheet 8.3 for compliance details.

**3. Spacing of 16-foot wide driveways would result in a spacing of 6 feet between driveways. Spacing of 18-foot wide driveways would result in a spacing of 4 feet between driveways. The City would approve an exception for either case.**

**Response:** There is 6-feet of spacing between the 16-foot-wide townhome driveways. See the Site Plan on Sheet 8.3 in enclosed Exhibit A for details.

#### **DKS**

**The TIA addresses Oregon’s Transportation Planning Rule (TPR) for the zone modification of the West Banks Development master plan with no significant impact on the transportation system.**

**The TIA finds that all study intersections will meet their respective mobility standards under existing conditions, in 2030, and in 2035. The TIA notes that left turn movements meet volume-based criterion for left-turn lanes at the OR 47 (Main Street)/NW Wilkes Street intersection in 2030 but are not recommended due to the restriping required to create turn lanes. This recommendation is reasonable; however, the City and ODOT should monitor the safety of this intersection after the residential project build-out and before the industrial site development, as the absence of turn lanes can increase the risk of rearend crashes<sup>2</sup>.**

**The TIA does not provide a recommendation for intersection control for the new intersection of the north-south collector and the Wilkes Street extension. This recommendation will need to be provided concurrent with the site plan development.**

**Response:** The proposed Wilkes Street extension and the new north-south roadway will be classified as collector streets, however they are likely to function more like local streets in terms of the future multimodal volumes they are projected to serve.

**While the intersection operations were not studied in detail as part of the TIA, it is recommended that the north-south approaches to the intersection be stop-controlled when considering just the residential development potential. Future industrial uses may necessitate alternative traffic control treatments such as all-way stop-control given the potential for more balanced traffic volumes through the intersection.**

The TIA recommends that a final sight distance evaluation is prepared post construction and prior to site occupancy at the proposed collector roadway connection to NW Cedar Canyon Road.

The TIA identifies that the intersection of OR-47/Oak Way/OR 6 WB meets overall mobility targets, however the eastbound left and eastbound through/right lanes exceed available queue storage. As the development directly contributes volume to these approach lanes, a proportional share of the Bank TSP project to mitigate these impacts should be considered. The Banks TSP project identifies storage length modifications for the eastbound approach and protected/permitted left turn signal phasing for all approaches.

**Response:** The applicant is investigating the appropriate amount of proportional share subject to this development.

The following minor issues were flagged in the review of the TIA. These issues do not warrant a revision of the TIA, however, should a revised TIA be produced in the future, these issues should be reviewed and revised as appropriate.

- The heavy vehicles percentage (HV %) shown in the traffic counts is not consistently reflected in the Vistro analysis sheets included in the Appendix. For example, for the existing conditions a.m. peak analysis for OR 47 (NW Main Street)/NW Cedar Canyon Road, the traffic counts indicate the HV % is 18 for the northbound-through movement; the Vistro analysis sheet includes a HV % of 20 for the same movement. There are similar errors at the OR 47 (Main Street)/NW Oak Way/OR 6 WB Ramp intersection; the remaining intersections (for all analysis periods) should be checked for the accuracy of heavy vehicle percentages or add note where values may differ as a result of conservative rounding.

**Response:** The raw summary counts in the Appendix have a summarized peak hour (7:40-8:40 AM) that is slightly different from the system peak hour used for all of the study intersections (7:45-8:45 AM). In retrospect, we should have included the 7:45-8:45 AM summary sheets to avoid the appearance of volume and heavy vehicle discrepancies.

- The 2035 analysis with the industrial development (see Appendix H) does not include any heavy vehicles in the eastbound or westbound traffic volume at the OR 47 (NW Main Street)/NW Wilkes Street for the a.m. or p.m. peak hours. The omission of heavy vehicles in the traffic volumes may underestimate the traffic impact of potential industrial development in the project area. However, the adding a projected HV % is unlikely to cause the intersection to exceed its mobility standard.

**Response:** A heavy vehicle percentage was inadvertently omitted at this intersection. Revised operations worksheets accounting for a 10% heavy vehicle percentage are included in a supplemental appendix in Exhibit B. As shown, adding this % does not cause the associated movements to exceed the mobility targets.

- **The Vistro analysis for all scenarios at OR-47 / Banks Road fails to account for crosswalks and pedestrian volumes. This location is likely to have increased pedestrian volumes with the increasing popularity of the Banks-Vernonia Trail and future trailhead expansion.**

**Response:** Revised operations worksheets accounting for a reasonable number of future pedestrian movements are included in a supplemental appendix in Exhibit B.

The following findings are from a transportation-focused review of the preliminary plans.

- **6: A Street/ Depot Street is a collector/collector intersection and is missing the south ADA ramps.**

**Response:** South ADA ramps were added for the Depot Street/ A Street intersection. For ADA paths within the proposed development see the ADA Circulation Plan Sheet 14.3 in Exhibit A.

- **8.1/8.2: Sight distance is not sufficient near townhomes. In addition, consider the impacts of parked vehicles.**

**Response:** The number of parking stalls along the eastern side of A street has been decreased in order to achieve a sight distance of 250', as measured from 15' back from edge of travel way.

- **14.1: Provide cross-section of 12' and 8' bike connections defining path surface and landscape buffer widths.**

**Response:** Cross-sections of 12' and 8' bike connections detailing path surface and landscape buffer widths have been provided on Vehicle Circulation Sheet 14.1 in Exhibit A.

- **14.2: What is the sidewalk width between 12' connection and D Street?**

**Response:** The sidewalk width between D Street and the 12' connection is 5' as indicated on the updated Pedestrian circulation Sheet 14.2 in Exhibit A.

- **14.2: Appears to be lack of ADA-accessible connection between A Street sidewalk and path between north end of the path and B street connection. Explore options for ADA ramp structure connection near E street.**

**Response:** The applicant explored the option of adding a switchback at this connection point, but it was determined that this would use too much available green space. ADA accessible connections are provided at the main park entrance, at either end of

the regional trail, and at the pedestrian connection off of B street. See details on the Pedestrian Circulation Sheet 14.2 and ADA Circulation Plan Sheet 14.3 in Exhibit A.

- **14.2 Add pedestrian circulation routes through park defining widths and note any non-ADA compliant grades.**

**Response:** Pedestrian circulation routes through the park with defined width and two non-ADA complaint stair connections have been noted on the Pedestrian Circulation Sheet 14.2 in Exhibit A.

- **15: List buildout space totals.**

**Response:** The buildout acreage total for each phase is included on updated Concept Plan Sheet 6 in Exhibit B.

### **Public Works**

Looking through the plans, I noticed that the tax lots may be incorrect on the existing HWY 47 homes. Now normally this wouldn't be a huge deal, but I wanted to make sure it was accurate with the "8' wide ped trail" across from Sunset Ave.

Which I'm assuming you guys are aiming for a split in properties for the future? I wanted to make sure it wasn't going to cause issues.

**Response:** The property lines have been corrected on the plan sheets. See the enclosed plans in Exhibit A for compliance.

### **ODOT**

Analysis items to note:

**1. Region Traffic assumes all land uses and densities offered under both the current and proposed zones are consistent with the City's code as cited in the report.**

**Response:** All land uses and density calculations were coordinated with and approved for use in the rezone analyses by City of Banks representatives.

**2. The proposed site will generate 45 exiting PM trips. However, only 44 exiting trips have been identified to exit the site, per Figure 3.**

**Response:** This discrepancy between Table 11 and Figure 6 is due to rounding and does not impact the results of the analysis or critical findings.

**3. The existing traffic conditions (Figure 3) don't appear to match the raw counts provided in the Appendix. Several movements have volumes lower than the raw traffic count peak hour volumes,**

such as the eastbound right at OR 47 at Cedar Canyon Road/Banks Road (34 vs 28) and the westbound left at the OR 47 at OR 6 WB Ramps intersections (141 vs 131).

**Response:** The raw summary counts in the Appendix have a summarized peak hour (7:40-8:40 AM) that is slightly different from the system peak hour used for all of the study intersections (7:45-8:45 AM). In retrospect, we should have included the 7:45-8:45 AM summary sheets to avoid the appearance of volume discrepancies.

**4. The study applied a seasonal adjustment of 1.06 to the raw traffic counts collected in December 2022. The study should supply the June 2022 traffic counts used to determine this seasonal factor.**

**Response:** Use of the December 2022 counts was selected based on 1) comparison with June 2022 traffic counts and 2) comparison with July 2023 counts at the same locations as described below.

At these three intersections, the December 2022 traffic counts were first compared against traffic counts collected by the City of Banks in the summer of June 2022. While the June 2022 counts were collected during a closure/detour of OR 47 north of Banks, a review of turning movement and approach volumes that would be minimally impacted by the closure/detour revealed a six percent difference. The six percent difference is much less than the seasonal factor calculations that would typically be calculated using the procedures in ODOT's Analysis Procedures Manual (APM). Given that Banks is essentially a bedroom community to the larger Portland metropolitan area and OR 47 through town is not a heavily traveled state highway that would generally be subject to significant through volumes and seasonal fluctuations, the more reasonable 1.06 seasonal factor was applied to the existing traffic volumes.

To help inform and validate the use of the 1.06 seasonal factor, the project team collected counts at the OR 47 (Main Street)/NW Oak Way/OR 6 Westbound Ramp Terminal in July 2023. While the July 2023 counts were not presented in the March 2024 TIA because they represent a period when local schools were not in session, review of the summer 2023 counts (when seasonal demand for travel to the coast is typically highest) found the July 2023 counts were comparable or less than the December 2022 counts. A screen shot of the December 2022 and July 2023 counts is shown below. For these reasons, we advanced the study using the December 2022 counts that were then increased by a factor of 1.06 along the highway approaches.

Type of peak hour being reported: User-Defined Method for determining peak hour: Total Entering Volume

LOCATION: OR 47 (Main St) -- NW Oak Way/OR 6 WB Ramp QC JOB #: 16036505  
 CITY/STATE: Banks, OR DATE: Thu, Dec 8 2022



Type of peak hour being reported: Intersection Peak Method for determining peak hour: Total Entering Volume

LOCATION: OR 6 WB Off Ramps -- NW Oak Way QC JOB #: 16286103  
 CITY/STATE: Banks, OR DATE: Fri, Jul 28 2023



Type of peak hour being reported: User-Defined Method for determining peak hour: Total Entering Volume

LOCATION: OR 47 (Main St) -- NW Oak Way/OR 6 WB Ramp QC JOB #: 16036506  
 CITY/STATE: Banks, OR DATE: Thu, Dec 8 2022



Type of peak hour being reported: Intersection Peak Method for determining peak hour: Total Entering Volume

LOCATION: OR 6 WB Off Ramps -- NW Oak Way QC JOB #: 16286104  
 CITY/STATE: Banks, OR DATE: Thu, Jul 27 2023



5. For ODOT facilities, the highest movement volume-to-capacity ratio (v/c) of the major and minor approaches at an unsignalized intersection should be reported. At the OR 47 at OR 6 EB Ramp Terminal intersection, the southbound left-turn movement is the highest v/c during the AM

peak hour. In addition, in the 2035 Total Traffic Conditions and 2035 Total Traffic Conditions (with Proxy Industrial Uses) the eastbound approach, not westbound, is the controlling movement during the PM peak hour.

**Response:** Upon review, we note an incorrectly reported V/C ratio during the AM peak hour, however this has no bearing on the overall operations findings which indicate the intersection critical movements are still forecast to operate at acceptable levels. Upon closer review of the reported weekday PM peak hour operations, we find the V/C ratio to be correctly summarized in Table 15 as the intersection has no eastbound approach due to the looping offramp configuration.

**Proposed mitigation comments:**

**6. ODOT maintains jurisdiction of the Nehalem Highway No. 102 (OR 47) and Wilson River Highway No. 37 (OR 6) and ODOT approval shall be required for all proposed mitigation measures to this facility.**

**Response:** The applicant will coordinate and apply for a State Highway Approach permit for the improvements to the Nehalem Highway No. 102 (OR 47) and NW Wilkes St intersection.

**7. No mitigation measures to a state highway have been proposed. This conclusion appears reasonable for this proposed development.**

### **SWATCO**

**Primary concern: Can our trucks adequately service the new development. The developer has worked with Swatco to ensure the new roads will work with our equipment. Ok**

**Secondary concern: Do the residents have room for their 3 waste carts on their property (Garbage, Recycle and Yard debris). It appears on the drawings that the townhomes have 2 car garages allowing carts to be stored in the garage and a car parked in the garage. Ok**

**Personal observation. Banks High school uses 'Braves' as their mascot, and I noticed a street name of Braves Way (and also Arrowhead). I know the High School has a relationship with a local native american tribe, is it possible for the developer to consult with the tribe to come up with street names that honor their culture? Their family names, their local geographic names, their cultural events. It seems that Arrowhead might not be their preferred name for a street on their land (maybe it is?).**

**Response:** The applicant partnered with the Banks High School and Confederated Tribes of the Grand Ronde for the street names. Names were chosen based on collaboration with the Leadership class at the high school after they received a letter from the Confederated Tribes of the Grand Ronde detailing history of the area. The name



'Arrowhead' was updated to Atfalati Lane after recommendation from the contact at Banks High School, then an exhibit of the names was then sent to the Curriculum Specialist for the Confederated Tribes of the Grand Ronde and received their approval of the names on June 14<sup>th</sup>, 2024. The street name sheet included in Exhibit C are the finalized names the applicant will be presenting to the Planning Commission.

#### **CWS COA's**

**Please include the following comments when writing your conditions of approval:**

**A Clean Water Services (CWS) Site Development Permit must be obtained prior to plat approval and recordation. Application for CWS Site Development Permit must be in accordance with the requirements of the Design and Construction Standards, Resolution and Order Nos. 19-5 as amended by R&O 19-22 (CWS Standards), or prior standards as meeting the implementation policy of R&O 18-28, and is to include:**

**c. Detailed plans showing each lot within the development having direct access by gravity to public storm and sanitary sewer. As development commences, extension of public conveyance systems to service adjacent uphill and/or upstream properties is required per R&O 19-5, Section 5.02. A public pump station is required to serve the entirety of the development,**

**Response:** The applicant confirmed with CWS Engineer Jeff Hart on June 3<sup>rd</sup>, 2024, that the adjacent off-site pump station has adequate capacity for the proposed development, see enclosed correspondence. The applicant will comply with the conditions of approval for each stage of the development.