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Date: March 22, 2019
To: Marion County Hearings Officer
From: Christian Snuffin, PE, PTOE
Joseph Marek, PE, PTOE
Clackamas County Transportation Engineering

Subject: Zone Change/Comprehensive Plan/Conditional Use Case 19-002/TLM Holdings LLC

We have reviewed the Traffic Impact Study for the subject zone change, dated February 2019, and prepared by DKS Associates, and we respectfully submit the following comments and recommendations:

- 1. Trip Generation.** The TIS provides trip generation for the existing use on the parcel that is equivalent to a 100,000 square foot church, which is inappropriate. The previous use on the site, the Missionary Memorial Church Theological Center, was a modest church camp with parking for a couple dozen vehicles at best. Moreover, the church is no longer occupied so the number of trips generated by the site is effectively zero. While a church may be allowed in EFU land as a conditional use, the assumed trip generation of a 100,000 square foot church is not an accurate representation of the previous land use, nor of a worst case use of the existing EFU. Assuming a 100,000 sf church on this site inflates the “existing” site trips, which significantly understates the impacts associated with the proposed zoning.
- 2. Trip Distribution.** The volume of traffic using Airport Rd seems low (5%) relative to OR-551 (30%). We believe that a significantly higher percentage of drivers will use the Airport Rd route, based on the fact that the site access will be to Airport Rd, and that Airport Rd provides a direct route to and from I-5.
- 3. Airport Rd & Miley Rd Intersection.** The TIS did not evaluate this intersection. After accounting for comments #1 and #2 above, the proposed zone change may cause a significant effect at the intersection. Clackamas County is concerned about additional traffic on Airport Rd because of traffic operations and safety at the intersection, which is a top SPIS site. A traffic signal is planned at the intersection, and it is listed in the Clackamas County Transportation System Plan (#1093). No funding has been identified. Clackamas County recommends that the applicant’s engineer evaluate impacts and potential mitigations at this intersection to address safety and efficiency.
- 4. Safety Improvements.** Although the signalized intersections of Arndt Rd / Airport Rd and Arndt Rd / OR 551 are not under Clackamas County jurisdiction, we recommend that reflectorized signal head backplates are considered to improve signal visibility and overall safety.

We ask that the applicant provide Clackamas County the opportunity to review and comment on a revised traffic impact study that addresses the issues outlined herein.