



October 30, 2020

City of Hermiston
Attention: Clint Spencer
180 NE 2nd Street
Hermiston, Oregon 97838

Eastern Oregon Development, LLC
Attention: Steve Richards
42980 Haney Lane
Pendleton, Oregon 97801

**Re: Hermiston Self-Storage Property Annexation, Comprehensive Plan Amendment, and Zone Change
Transportation Impact Analysis Scoping Letter**

C&A Project Number 20201003.00

Dear Mr. Spencer and Mr. Richards,

This Transportation Impact Analysis (TIA) scoping letter supports the proposed Hermiston Self-Storage property land use actions and addresses the City of Hermiston Development Code requirements. The following items are specifically addressed:

1. Property Description and Proposed Land Use Actions
2. Study Parameters
3. Assumed Development Scenarios
4. Trip Generation
5. Trip Distribution and Traffic Assignment
6. Study Area
7. Intersection Safety
8. Transportation Analysis
9. Summary

1. PROPERTY DESCRIPTION AND PROPOSED LAND USE ACTIONS

The subject property is located at 455 E Elm Avenue (OR 207), in Hermiston, Oregon. The property is 11.50 acres in size and is described as tax lot 500 on the Umatilla County Assessor's Map 4N2802CD. Currently, the southwest property corner is developed with a single-family residence and the remainder is an agricultural use. Property access is to E Elm Avenue approximately 325 feet east of the NE 4th Street intersection. The subject property and study area are illustrated in the attached Figure 1.

The property is located within the Urban Growth boundary but is outside the Hermiston City limits. The property currently has a City of Hermiston Comprehensive Plan designation of Medium-Density Residential and is zoned Multi-Family Residential (R-3). Proposed land use actions include annexation into the City limits, a Comprehensive Plan designation change to Commercial, and a zone change to Neighborhood Commercial Overlay (NCO).

Proposed land use actions further contemplate splitting tax lot 500 into two separate lots. The resulting 9.225-acre western tax lot is proposed to be developed with a self-storage facility which is a Conditional Use in the NCO Zone. The existing single-family residence will be removed. The resulting 2.275-acre eastern tax lot will remain undeveloped at this time. The existing property access to Elm Avenue will serve the western tax lot and a new access to Elm Avenue is proposed to serve the eastern tax lot. A copy of the preliminary site plan is attached for reference.

The proposed self-storage facility is anticipated to be completed in two phases, with each phase being 600 units or less. This proposed facility includes RV storage (enclosed units, canopy storage, and open parking) if approved. The anticipated completion date for Phase I is March 2022 and Phase II is 2027.

2. STUDY PARAMETERS

Transportation Analysis Description

Subject land use actions include an Annexation, a Comprehensive Plan designation change, and a zone change request; therefore, a transportation impact analysis (TIA) may be necessary to address City of Hermiston Municipal Code criteria, Transportation Planning Rule (TPR) criteria outlined in Oregon Administrative Rule (OAR) 660 012-0060, and Oregon Department of Transportation (ODOT) criteria.

Hermiston Municipal Code Criteria

Hermiston Municipal Code Section 157.1509 – *Transportation Improvements, Standards, and Procedures* states,

(D) Zone changes. In addition to the zone change approval criteria set forth in 157.226(E), all zone changes shall conform to the adopted Transportation System Plan (TSP). Proposed zone changes shall not substantially impact the functional classification or operation of transportation facilities. To ensure proper review and mitigation, a traffic impact study may be required for proposals that may impact transportation facilities.

(E) Traffic impact study. The applicant for a zone change, or a development or subdivision subject to the Development Standards of 157.160 et seq., shall submit a traffic impact study when the proposal affects a transportation facility if it:

- (1) Changes the functional classification of an existing or planned transportation facility;*
- (2) Changes standards implementing a functional classification system;*
- (3) Allows types or levels of land use that would result in levels of traffic or access that are inconsistent with the functional classification of a transportation facility; or*
- (4) Would reduce the level of service of the facility below the minimum acceptable level identified in the Transportation System Plan.*

(G) Access management. The following access management provisions shall apply to all development and subdivisions subject to the Development Standards of § 157.160 et seq.:

- (1) Development shall preserve the flow of traffic in terms of safety, capacity, functional classification, and level of services. Access management policies set forth in the city TSP and the Oregon Highway Plan will apply to any proposals for new access or change of existing access.*
- (2) Residential driveways shall be located to optimize intersection operation and, where possible, to access off the street with the lowest functional classification. For example, if a house is located on the corner of a local street and a minor collector, the driveway shall access from the local street as long as it can be located a sufficient distance from the intersection.*
- (3) Properties that front on collector or arterial streets are encouraged to share an access with neighboring properties.*
- (4) Access to state highways is regulated by the Oregon Department of Transportation (ODOT) as described in the Oregon Highway Plan. Umatilla County regulates access to county roads.*

Transportation Planning Rule (TPR) Criteria

OAR 660-012-0060 (1) states, *"If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:*

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

(b) Change standards implementing a functional classification system; or

(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan."

OAR 660-012-0060 (9) states, *“Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned transportation facility if all of the following requirements are met.*

(a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map;

(b) The local government has an acknowledged TSP and the proposed zoning is consistent with the TSP; and

(c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area.”

Oregon Department of Transportation (ODOT) Criteria

The existing property access to Elm Avenue (OR 207) will serve the western tax lot and a new access to Elm Avenue is proposed to serve the eastern tax lot. Noting both of these accesses are to a roadway under ODOT jurisdiction, Hermiston Municipal Code Section 157.1509(G)(8) – *Access Management* states, *“Access to state highways is regulated by the Oregon Department of Transportation (ODOT) as described in the Oregon Highway Plan.”*

Based on preliminary discussions with ODOT staff, the existing property access (which will serve the proposed western tax lot) is *“presumed to be permitted”*; however, it will need to be evaluated relative to the anticipated transportation impacts resulting from the proposed self-storage facility.

The proposed (future) property access (which will serve the proposed eastern tax lot) will need to be evaluated separately at the time the tax lot is created and/or when specific property development is contemplated. As such, this access is not part of this land use application.

Analysis Scenarios and Study Area

Based on the City of Hermiston and TPR transportation analysis requirements, the following analysis scenarios are considered:

- 2020 Existing Conditions
- 2027 Full Build-out of the Self-Storage Facility on the Western Tax Lot
- 2040 Current Zone Designation (R-3) – TPR purposes only
- 2040 Proposed Zone Designation (NCO) – TPR purposes only

3. ASSUMED DEVELOPMENT SCENARIOS

The subject property will be split into two separate lots. The resulting 9.225-acre western tax lot is proposed to be developed with a self-storage facility in two phases. The existing single-family residence will be removed. The resulting 2.275-acre eastern tax lot will remain undeveloped at this time.

The following development scenarios are assumed based on the applicant's proposed self-storage facility and the permitted uses identified in the Hermiston Development Code.

Current Multi-Family Residential (R-3) Zone Designation

Description

The R-3 zone designation allows all uses permitted in the R-1 and R-2 zones; bed and breakfast, boarding, lodging, or rooming houses; multiple-family dwellings; and residential care facilities.

Reasonable Worst-Case Development Assumptions

- The R-3 zone allows a wide range of residential development types.
- The gross site area is 11.5 acres.
- 20% of the site area is used for right-of-way and other infrastructure.
- The net developable area is 9.2 acres.
- Based on projected City development trends, approximately 70% of the site (6.44 acres) will develop as single-family residential at a density of 7 dwelling units per acre and 30% (2.76 acres) will develop as multi-family residential at a density of 21 dwelling units per acre.
- The resulting development includes 45 single-family residences and 58 apartments.
- A review of ITE *Trip Generation Manual*, 10th Edition data finds Multifamily Housing (Low-Rise) (Land Use Code 220) to have the highest trip generation for the apartments.

Proposed Neighborhood Commercial Overlay (NCO) Zone Designation

Description

The NCO zone designation creates a commercial environment providing a broad range of commercial services to dense residential users within walking distance. The goal is to take advantage of opportunities for infill, redevelopment, and new development in outlying commercial areas; and to allow different types of compatible land uses close together to shorten traffic trips and facilitate all modes of transportation such as vehicles, pedestrians, and bicycles. It is further noted the applicant's proposed self-storage facility is a conditional use in the NCO zone.

Reasonable Worst-Case Development Assumptions

Western Tax Lot – 9.225 Acres

- The applicant is proposing the specific development of a 1,200-unit self-storage facility.
- ITE *Trip Generation Manual*, 10th Edition data for a Mini-Warehouse (Land Use Code 151) is used for trip generation estimating purposes.

Eastern Tax Lot – 2.275 Acres

- The NCO zone allows a wide range of commercial development types.
- The gross site area is 2.275 acres (99,099 square feet).
- 25% building area coverage accounting for parking, site circulation, and landscaping.
- Development is a collection of small neighborhood-oriented retail spaces totaling 24,775 square feet.
- A review of ITE *Trip Generation Manual*, 10th Edition data finds a Shopping Center (Land Use Code 820), which contains a large number of commercial land uses including neighborhood centers to have the highest trip generation.

4. TRIP GENERATION

For the western tax lot, trip generation is based on the applicant's proposed self-storage facility. For the eastern tax lot, specific development is unknown; therefore, trip generation is based on the reasonable worst-case commercial use development scenario described in the previous section.

Additionally, a portion of the commercial trips are primary (new trips on the roadway system traveling specifically to/from the proposed development), and a portion are pass-by (existing trips on the roadway system that 'divert' to the subject development before continuing on their original trip path to their destination.)

Trip generation was estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition and practices from the ITE *Trip Generation Handbook*, 3rd Edition for the assumed development scenarios.

TABLE 1 – DEVELOPMENT TRIP GENERATION					
Land Use	ITE Code	Size	PM Peak Hour		
			Enter	Exit	Total
Proposed NCO Zone Designation – Western Tax Lot					
Total Trips – Mini-Warehouse ¹	151	1,200 Units	11	12	23
Proposed NCO Zone Designation – Eastern Tax Lot					
Total Trips – Shopping Center ¹	820	24,775 SF	45	49	94
Pass-By/Diverted-Link Trips – Shopping Center (34% Enter / 34% Exit) ²			15	17	32
Primary (Net New) Trips – Shopping Center			30	32	62
Primary (Net New) Trip Generation – All Proposed NCO Zone Development			41	44	85
Current R-3 Zone Designation					
Total Trips – Single-Family Detached Housing ³	210	45 DU	30	17	47
Total Trips – Multifamily Housing (Low-Rise) ³	220	58 DU	23	13	36
Total Trips – All Residential Uses			53	30	83
Change in Trip Generation (Proposed – Existing)			(12)	14	2

¹ Trip generation estimated using the *Average Rate* per recommended practice in the ITE Trip Generation Handbook, 3rd Edition.

² Pass-By trip percentages based on ITE *Trip Generation Handbook*, 3rd Edition recommended practice.

³ Trip generation estimated using the *Fitted Curve* per recommended practice in the ITE Trip Generation Handbook, 3rd Edition.

As identified in the table above, the Proposed NCO Zone Designation development generates 2 more PM peak hour trips than the Current R-3 Zone Designation development. This trip generation increase and the resulting transportation system impacts are so small as to be unmeasurable. It is further noted that transportation system volume fluctuations typically range from 2-5% which is far greater than 2 trips. As such, the subject development is found to have *de minimus* transportation system impacts and no further analysis is necessary to address TPR requirements; however, additional transportation analysis may be necessary to address City and ODOT requirements.

5. TRIP DISTRIBUTION AND TRAFFIC ASSIGNMENT

Noting the 2.275-acre eastern tax lot will not be developed at this time, the remaining analysis focuses on the 9.225-acre western tax lot that is proposed to be developed with a self-storage facility in two phases.

Proposed self-storage facility trip distribution is based on existing intersection volumes, surrounding land uses, and engineering judgment. Trip distribution and traffic assignment are illustrated in the attached Figure 2.

6. STUDY AREA

The Hermiston Municipal Code does not specifically identify volume thresholds triggering the need for specific intersection analysis. Rather materials state, “...[A] traffic impact study may be required for proposals that may impact transportation facilities... if it... changes the functional classification of an existing or planned transportation facility, changes standards implementing a functional classification system, allows types or levels of land use that would result in levels of traffic or access that are inconsistent with the functional classification of a transportation facility, or would reduce the level of service of the facility below the minimum acceptable level identified in the Transportation System Plan.”

Property access is to Elm Avenue (OR 207) which is functionally classified as an *Urban Minor Arterial* roadway. As such, the proposed self-storage facility is not anticipated to change the functional roadway classification or implementing standards, and it will not result in levels of traffic or access inconsistent with the functional roadway classification.

Based on development trip generation and distribution presented in this analysis, the following project area intersections are considered for evaluation.

TABLE 2 – PROJECT AREA INTERSECTIONS CONSIDERED FOR EVALUATION		
Intersection	Proposed PM Peak Hour Development Trips	Percentage of Total Intersection Entering Traffic Volume (2019 30HV)
E Elm Avenue (OR 207) / NE 4 th Street	11	0.9%
E Elm Avenue (OR 207) / Site Access	23	3.4%

As identified in the table above, the subject development accounts for <1% of the entering traffic volume at Elm Avenue (OR 207)/4th Street intersection, and the resulting development impacts are so small as to be unmeasurable. It is further noted that daily traffic fluctuations at this intersection typically range from 2-5%. As such, the subject development is found to have *de minimus* transportation system impacts.

Development trip generation is low and the Elm Avenue (OR 207)/Site Access intersection is anticipated to operate an acceptable level of service (mobility target). As such, it is not anticipated additional analysis will be required. It is further anticipated the access will be designed and constructed to Hermiston Municipal Code standards and that no further evaluation of the development access is necessary.

7. INTERSECTION SAFETY

When evaluating intersection safety, consideration is given to the total number and types of crashes occurring and the number of vehicles entering the intersection. This leads to the concept known as “*crash rate*”, typically expressed in terms of the number of crashes occurring per one million vehicles entering the intersection (crashes/mev). A critical crash rate analysis is then performed by comparing the subject intersection to the published statewide 90th percentile intersection crash rates at comparable/reference intersections. Crash rates close to or exceeding the 90th percentile rates require further analysis.

Crash data at the Elm Avenue (OR 207)/4th Street intersection was obtained from the Oregon Department of Transportation (ODOT) for five years from January 1, 2015 through December 31, 2019. The following table presents the study intersection crash rates and critical crash analysis. All crash data and crash rate calculations are attached for reference.

TABLE 2 – INTERSECTION CRASH RATES									
Intersection	2015	2016	2017	2018	2019	Total	Observed Crash Rate (crashes/mev)	Reference Population Description ¹	90 th %ile Crash Rate
E Elm Avenue (OR 207) / NE 4 th Street	4	1	2	5	0	12	0.567	Urban 4SG	0.860

¹4SG (Four-Led Signalized)

The study area intersection crash rates are less than the 90th percentile crash rates of the reference intersection. As such, the intersection is considered relatively safe and no further evaluation of safety deficiencies is necessary.

8. TRANSPORTATION ANALYSIS

Given the small number of peak hour development trips and the *de minimus* impacts, and the fact the Elm Avenue (OR 207)/4th Street intersection operations are currently well within agency mobility targets¹ and are anticipated to remain within this target at full-buildout of the self-storage facility in 2027, the applicant respectfully requests the City of Hermiston and ODOT consider waiving the TIA requirement.

¹ Materials contained in the July 22, 2019 Piercy Property Transportation Impact Analysis prepared by Clemow & Associates indicate the ODOT mobility target at the E Elm Avenue (OR 207)/NE 4th Street intersection is a v/c ratio ≤ 0.85. Operations analysis finds the intersection operates at a v/c ratio of 0.43 in 2019 and at 0.57 in 2039.

Alternatively, if specific intersection analysis is required, the applicant respectfully requests the City and/or ODOT to identify all intersection(s) requiring analysis. Considering current background transportation system operations may not be “typical” due to Covid-19 impacts, if additional operations analysis is required, the applicant also respectfully requests the agencies to provide direction regarding assumptions for background intersection volumes, such as using previously obtained 2019 volumes and applying an appropriate background traffic growth rate.

9. SUMMARY

Materials presented in this letter are intended to identify the applicant’s TIA scope of work necessary to support the proposed development. Specific analysis methodologies are not identified in this letter; however, all analyses will be performed consistent with agency requirements.

Following your review of this scope of work, please let us know of any necessary revisions or modifications so we can begin any necessary analysis.

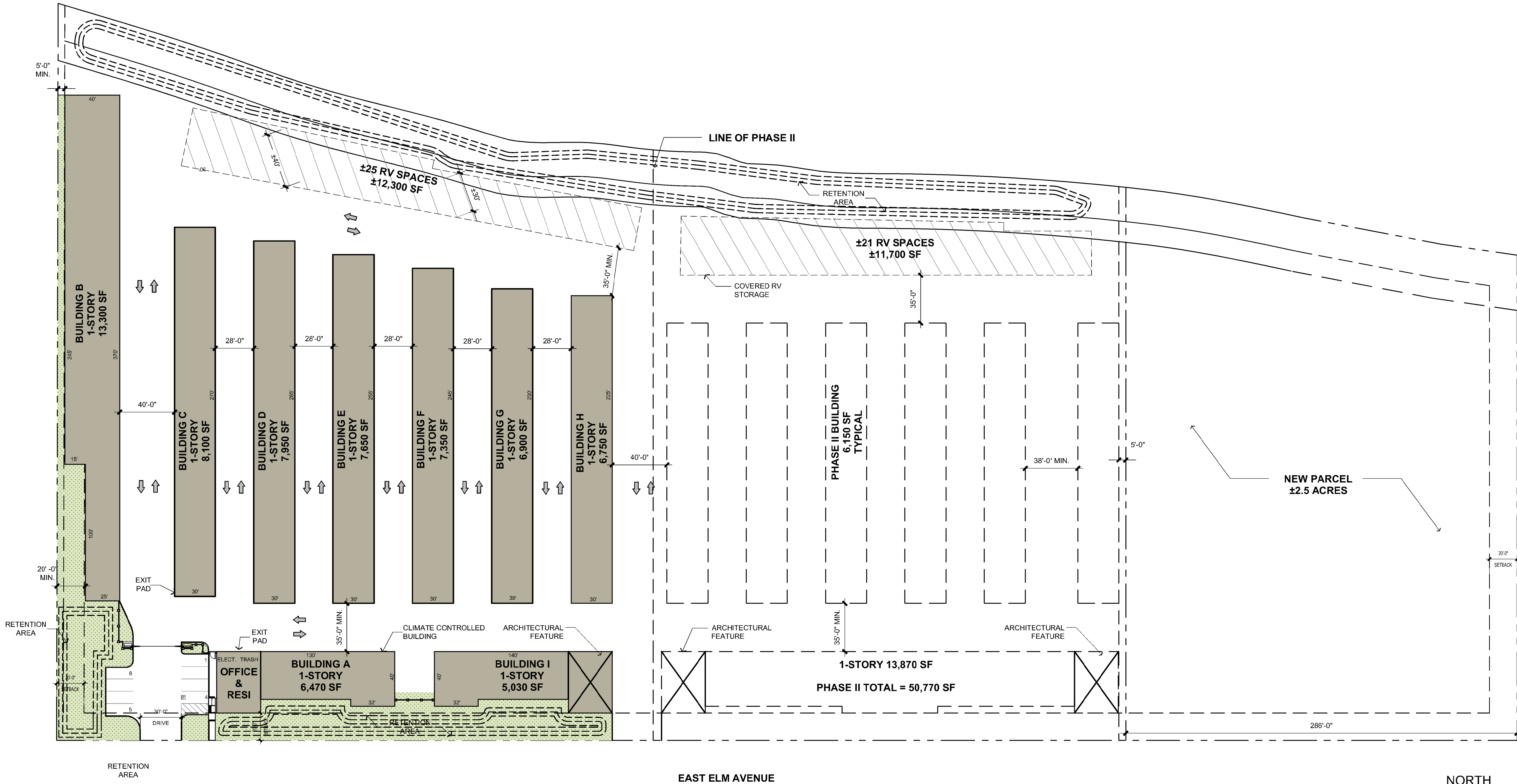
Sincerely,



Christopher M. Clemow, PE, PTOE
Transportation Engineer



Attachments: Preliminary Site Plan
Figures 1 and 2 – Study Area and Trip Distribution and Traffic Assignment
Crash Data



SITE DATA			
LOT AREA	500,940	SQ. FT.	
	11.5	ACRES	
TOTAL GROSS BLDG. AREA	69,500	SQ. FT.	
PARKING SPACES PROVIDED			
STANDARDS	7		
ACCESSIBLE	1		
TOTAL	8		
BASIS OF DESIGN			
	REQUIRED	PROVIDED	
ZONE	REZONE TO C-2		
OVERLAY	NEIGHBORHOOD COMMERCIAL OVERLAY		
STRUCTURE HEIGHT	50 FT.	TBD	
FLOOR AREA RATIO	N/A	N/A	
LOT COVERAGE	N/A	13.6% (68,060 S.F.)	
LANDSCAPE	N/A	±16,000 S.F. (3.2%) LANDSCAPE AREA	
SETBACKS :			
FRONT (RIGHT OF WAY)	20'	20 FT. MIN.	
INTERIOR SIDE	20 FT.	20 FT.	
EXTERIOR SIDE	N/A	N/A	
REAR	25 FT.	25 FT. MIN.	
PARKING SPACES	3 SPACES + PER 1,000 S.F. OF OFFICE SPACE = 4 SPACES	8 SPACES	
PARKING SIZE	STANDARD: 9' X 20'	STANDARD: 9' X 20'	
BUILDING AREA TABULATIONS (Square Feet)			
	SELF STORAGE	OFFICE & RESI	TOTAL
BUILDING A	3,590	2,880	6,470
BUILDING B	13,300		13,300
BUILDING C	8,100		8,100
BUILDING D	7,950		7,950
BUILDING E	7,650		7,650
BUILDING F	7,350		7,350
BUILDING G	6,900		6,900
BUILDING H	6,750		6,750
BUILDING I	5,030		5,030
TOTAL AREA:	66,620	2,880	69,500
EST. NET STORAGE AREA = 60,000 S.F.			
COVERED RV STALLS = ±46 STALLS (±24,000 SF)			
PHASE II SQUARE FOOTAGE = 50,770 GROSS SF			

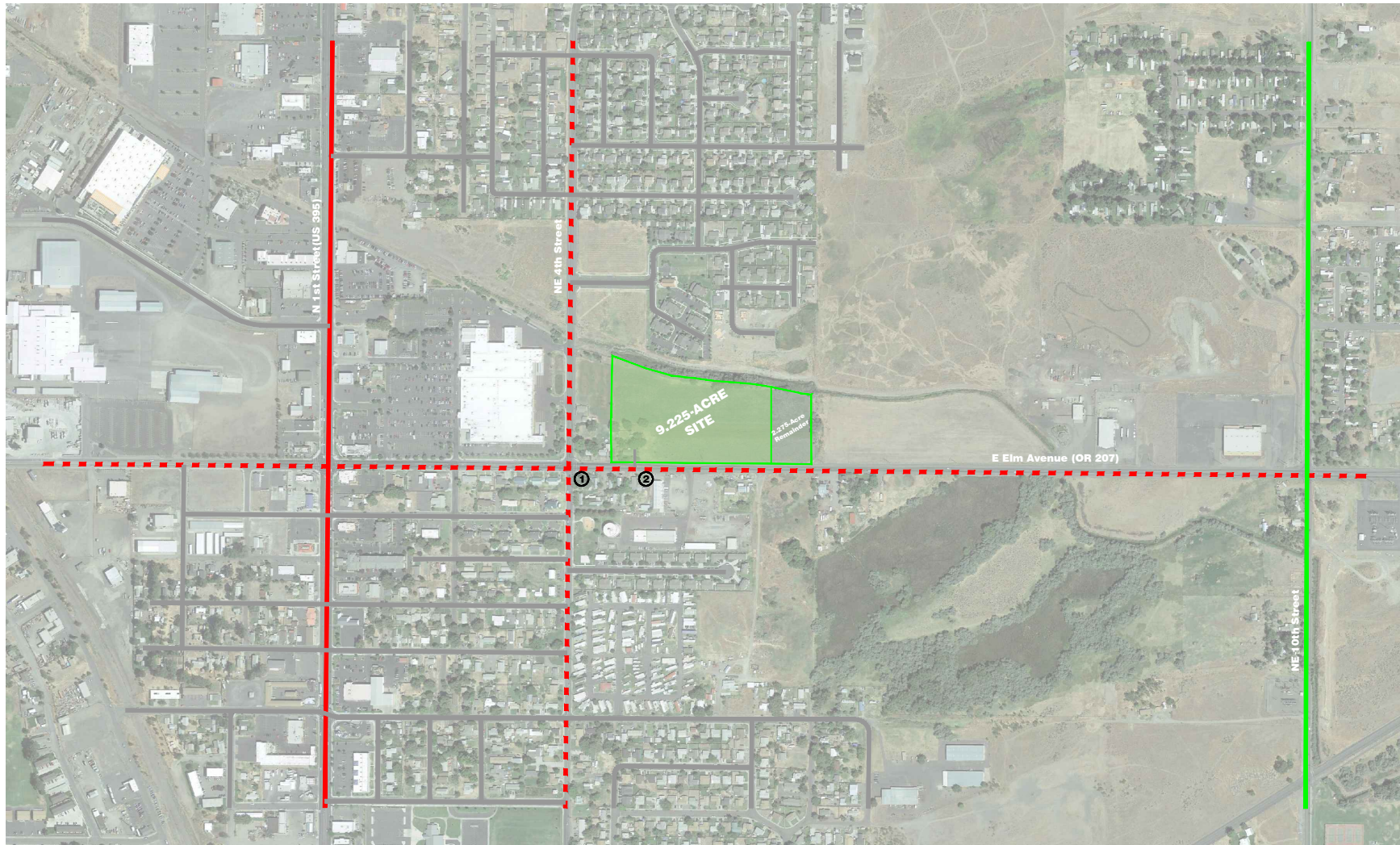
BUILDING CONSTRUCTION TYPE: IIB
OCCUPANCY CLASSIFICATION: S-1. TOP STORAGE IN NOT GRATER THAN 8'
BUILDINGS ARE EQUIPPED WITH AUTOMATIC FIRE SPRINKLER SYSTEM IN ACCORDANCE WITH NFPA 13.

E.O. DEVELOPMENT, LLC
ELM AVENUE S.S.
HERMISTON, OR

SCHEME C
PRELIMINARY SITE PLAN

JOB NUMBER: 20-1009
SCALE: 1"=40'-0"
DATE: 10/26/2020

ja
JORDAN
ARCHITECTS
131 CALLE IGLESIA, SUITE 100
SAN CLEMENTE, CA 92672
949.388.8090



Roadway Functional Classification

- Urban Major Arterial
- - - Urban Minor Arterial
- Urban Major Collector
- Local



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Eugene, Oregon 97402
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cclemow@clemow-associates.com

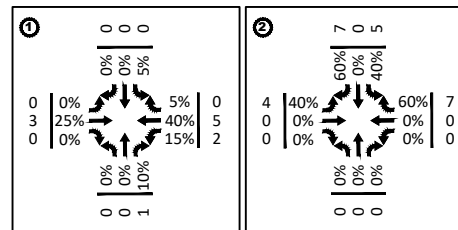
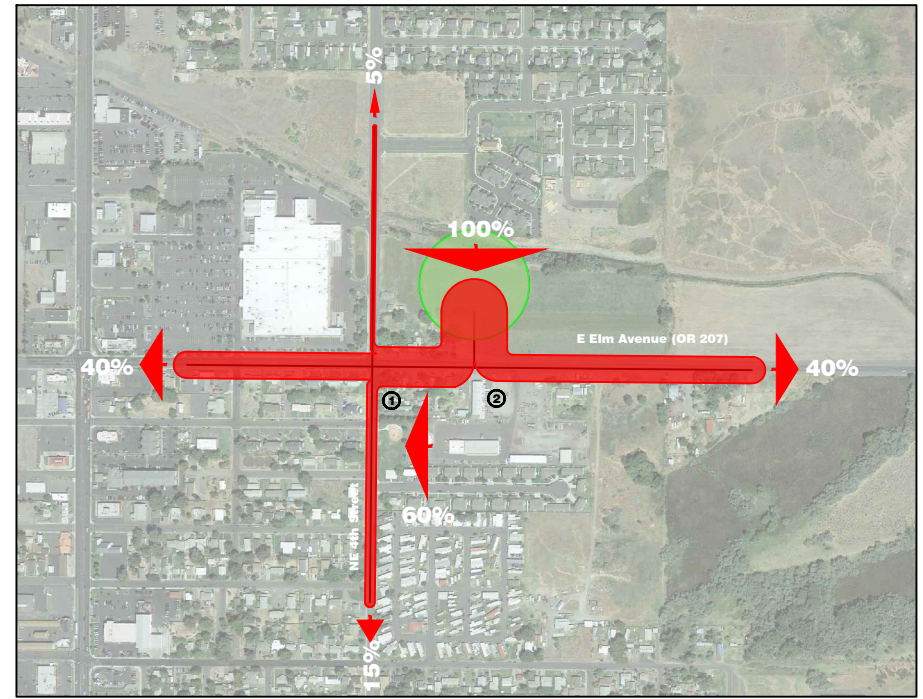
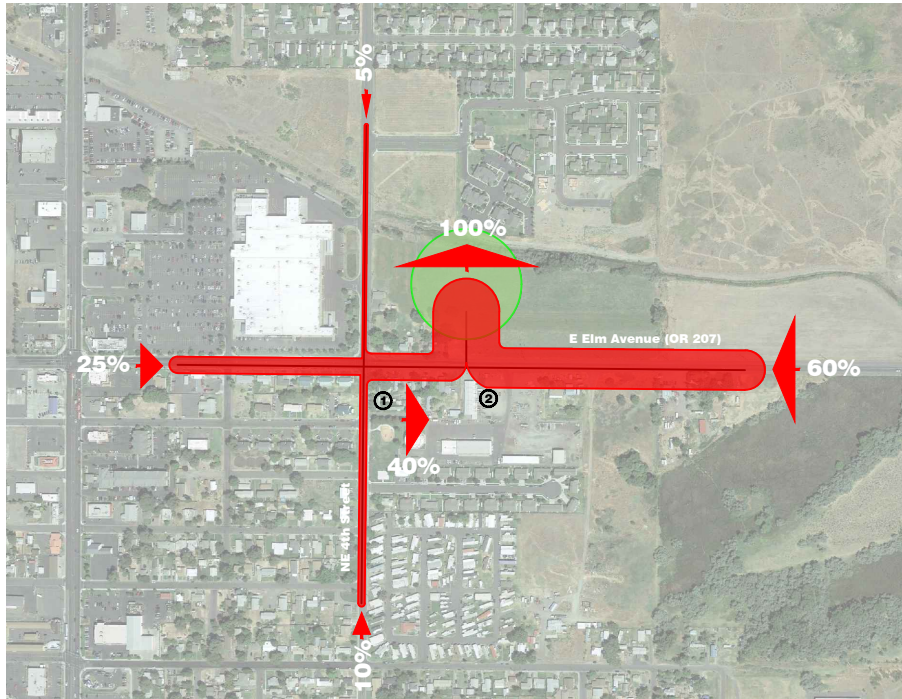
STUDY AREA

Hermiston Self-Storage - Hermiston, Oregon

C&A Project No. 20201003.00

FIGURE

1



January 1, 2015 through December 31, 2019

INTERSECTION CRASH RATES														
Intersection							PM Entering Volume	ADT (10xPM)	AADT (365xADT)	Annual Crashes	Crash Rate (crashes/MEV)	Reference Population	90th%ile Crash Rate	Over or Under Crash
	2015	2016	2017	2018	2019	Total								
E Elm Avenue (OR 207) / NE 4th Street	4	1	2	5	0	12	1,160	11,600	4,234,000	2.40	0.567	Urban 4SG	0.860	Under