

**TO:** Aaron Panko, Planner III  
Community Development Department

**FROM:** Glenn J. Davis, PE, CFM, Chief Development Engineer  
Public Works Department

**DATE:** October 12, 2018

**SUBJECT:** **PUBLIC WORKS RECOMMENDATIONS**  
**SPR-DAP18-15 (18-112081-RP)**  
**4865 27<sup>TH</sup> AVENUE SE**  
**KUEBLER GATEWAY SHOPPING CENTER**



## PROPOSAL

A Class 3 Site Plan Review for construction of a new retail shopping center, including four proposed retail shell buildings, a 168,550-square-foot building for Costco Wholesale, a retail fueling station with up to 30 pump positions, and a Class 2 Driveway Approach permit for proposed driveway access to Boone Road SE and 27<sup>th</sup> Avenue SE, for property approximately 20.6 acres in size, zoned CR (Retail Commercial), and located in the 2500-2600 Block of Boone Road SE - 97306 (Marion County Assessor's Map and Tax Lot numbers: 083W12C / 01800, 01900, 02000, and 02100, also 083W11D / 02400, 02500, 02600, and 02700).

## RECOMMENDED CONDITIONS OF APPROVAL

1. Along the frontages of Boone Road SE and 27<sup>th</sup> Avenue SE, construct a half-street improvement to Collector street standards as specified in the City Street Design Standards and consistent with the provisions of SRC Chapter 803. The fee-in-lieu amounts previously collected may be used towards the security amount required for the public construction pursuant to SRC 110.100.
2. The east site driveway on 27<sup>th</sup> Avenue SE should be constructed as a single-lane roundabout, with southbound right-turn by-pass lane to the site.
3. A stop sign should be installed on at the new south site driveway (southbound) approach to Boone Road SE.
4. The westbound left-turn lane at intersection of Kuebler Boulevard SE and Battle Creek Road SE should be restriped to provide 400 feet of storage.

5. All future landscaping, above-ground utilities, and site signage should be located and maintained to ensure adequate sight-distance is provided at the site driveways.
6. For the portion of the subject property within Kuebler Gateway Subdivision, the applicant shall comply with the stormwater management plan that was adopted under SRC 71.180(c) and approved with SUB14-01.
7. For the portion of the subject property outside Kuebler Gateway Subdivision, the applicant shall design and construct a storm drainage system for areas of new and replaced impervious surface in compliance with SRC Chapter 71 and the current Public Works Design Standards (PWDS).

The following conditions of approval implement the requirements from CPC-ZC06-6 that are not yet complete:

8. From CPC-ZC06-6, Condition 1: The intersection of Battle Creek and Boone Roads SE shall be improved to include a traffic signal with an eastbound left-turn lane. The southbound left-turn lane shall be lengthened to provide a minimum of 300 feet of storage.
9. From CPC-ZC06-6, Condition 2: The intersection of Battle Creek Road SE and Kuebler Boulevard SE shall be improved to provide a northbound left-turn lane with a minimum of 300 feet of storage. To provide the necessary northbound left-turn storage at this intersection with the southbound left-turn lane storage at Battle Creek and Boone Roads, side-by-side left-turn lanes shall be constructed as approved by the Public Works Director.
10. From CPC-ZC06-6, Condition 4: Install striping for dual left-turn lanes on westbound Kuebler Boulevard SE at 27th Avenue SE. For the westbound left-turn lanes, an additional receiving lane shall be constructed which will drop immediately south of the subject property's driveway on 27th Avenue SE.
11. From CPC-ZC06-6, Condition 6: Pay \$5,000 for traffic calming devices (such as speed humps or other traffic calming measures) to be used in the residential neighborhood south of the proposed development as determined through the City's Neighborhood Traffic Management Program.
12. From CPC-ZC06-6, Condition 10: The developer shall provide sidewalks along all street frontages. The sidewalk shall be located along the curb line only where needed to reduce conflicts with the previously mitigated wetland areas; all other sidewalks shall be located parallel to and one foot from the adjacent right-of-way.

## **FACTS**

### **Streets**

#### 1. 27<sup>th</sup> Avenue SE

- a. Standard—This street is designated as a Collector street in the Salem TSP. The standard for this street classification is a 34-foot-wide improvement within a 60-foot-wide right-of-way.
- b. Existing Conditions—This street has a variable-width (28-foot minimum) improvement within a 68-foot-wide right-of-way abutting the subject property.

#### 2. Boone Road SE

- a. Standard—This street is designated as a Collector street in the Salem TSP. The standard for this street classification is a 34-foot-wide improvement within a 60-foot-wide right-of-way.
- b. Existing Conditions—This street has a minimum 20-foot improvement within a minimum 60-foot-wide right-of-way abutting the subject property.

#### 3. Battle Creek Road SE

- a. Standard—This street is designated as a Minor Arterial street in the Salem TSP. The standard for this street classification is a 46-foot-wide improvement within a 72-foot-wide right-of-way.
- b. Existing Conditions—This street has an minimum 58-foot improvement within a 72-foot-wide right-of-way abutting the subject property.

#### 4. Kuebler Boulevard SE

- a. Standard—This street is designated as a Parkway street in the Salem TSP. The standard for this street classification is an 80-foot-wide improvement within a 120-foot-wide right-of-way.
- b. Existing Conditions—This street was fully constructed as part of a City of Salem Capital Improvement Project (PN 713513) that was completed in March 2018 and has adequate right-of-way along the frontage of the subject property.



## **Storm Drainage**

### **1. Existing Conditions**

- a. A 12-inch storm main is located in Kuebler Boulevard SE.
- b. An 18-inch storm main is located in Boone Road SE.
- c. A detention basin is located in the northeast corner of the subject property.
2. The portion of the subject property within Kuebler Gateway Subdivision is subject to the stormwater management plan adopted under SRC 71.180(c) that was submitted and approved with SUB14-01.
3. The portion of the subject property outside Kuebler Gateway Subdivision shall be designed and constructed to current water quality and flow control standards as found in SRC Chapter 71 and 2014 Public Works Design Standards (PWDS).

## **Water**

### **1. Existing Conditions**

- a. The subject property is within the S-2 water service level.
- b. A 12-inch water main is located in Battle Creek Road SE and Kuebler Boulevard SE along the frontage of the western portion of the subject property. Mains of this size generally convey flows of 2,100 to 4,900 gallons per minute.
- c. The undeveloped lots on the western portion of the subject property are currently served from the 12-inch main located in Kuebler Boulevard SE. There is a 10-foot water access easement along the eastern boundary of Lot 3 in order to serve Lot 4.
- d. There are 24-inch and 30-inch water mains located in Boone Road SE. 24-inch mains generally convey flows of 8,500 to 19,700 gallons per minute. The southeastern lot is currently served by the 24-inch main.
- e. A 2-inch irrigation water service line is located within the right-of-way along the northern frontage of the eastern portion of the development, extending from the 8-inch fire service main (hydrant) to the stormwater detention basin at the northeast corner of the property.

## **Sanitary Sewer**

### **1. Existing Conditions**

- a. A private sewer system serves the Kuebler Gateway Subdivision.
- b. A 24-inch sewer line is located in 27<sup>th</sup> Avenue SE.

## **CRITERIA AND FINDINGS**

### **Urban Growth Preliminary Declaration**

An Urban Growth Preliminary Declaration was issued for the subject property under SPR-UGA12-11. The application depicted three phases of development: UGA Phase 1, UGA Phase 2, and UGA Future Phase. UGA Phase 1 applied to the Salem Clinic development that has already been completed. UGA Phase 2 and UGA Future Phase apply to the subject property. All conditions of approval from SPR-UGA12-11 have been completed except for the following:

- Condition 9: As a condition of building permit for UGA Phase 2 or UGA Future Phase, complete all remaining mitigating street improvements required as a condition of approval for ZC09-03 and specified in CPC-ZC06-6.

This condition of approval is described in more detail below in conjunction with findings related specifically to CPC-ZC06-6.

### **Site Plan Review**

Analysis of the development based on relevant criteria in SRC 220.005(f)(3) is as follows:

**Criteria: SRC 220.005(f)(3)(A) The application meets all applicable standards of the UDC (*Unified Development Code*)**

**Finding**—With completion of the conditions above, the subject property meets all applicable standards of the following chapters of the UDC: 601 – Floodplain, 802 – Public Improvements, 803 – Streets and Right-of-Way Improvements, 804 – Driveway Approaches, 805 – Vision Clearance, 809 – Wetlands, and 810 - Landslides.

According to the City's adopted landslide hazard susceptibility maps and SRC Chapter 810 (Landslide Hazards), there are mapped 2-point and 3-point landslide hazard areas on the subject property. The proposed activity of a commercial building adds 3 activity points to the proposal, which results in a total of 5-6 points. Therefore,



the proposed development is classified as a moderate landslide risk and requires a geological assessment and/or geotechnical engineering report. A Geotechnical Engineering Report, prepared by Terracon Consultants, Inc. and dated April 16, 2018, prepared for Costco Wholesale was submitted to the City of Salem. A second Report of Geotechnical Engineering Services, prepared by GeoDesign Inc and dated June 13, 2016, prepared for PacTrust was also submitted to the City of Salem. These reports demonstrate the subject property could be developed without increasing the potential for slope hazard on the site or adjacent properties.

Wetland remediation work was completed under Army Corp of Engineers permit number #NWP-2012-48. Wetlands remain on the property along the north side of Boone Road and the west side of 27th Avenue SE. The applicant's site plan does not propose to negatively impact the wetland areas. Wetland notice was sent to the Oregon Department of State Lands pursuant to SRC 809.025.

**Criteria: SRC 220.005(f)(3)(B) The transportation system provides for the safe, orderly, and efficient circulation of traffic into and out of the proposed development, and negative impacts to the transportation system are mitigated adequately**

**Finding**—Land Use Decision CPC-ZC06-6 directed future developments to meet certain conditions of approval in order to ensure that the transportation system provides for the safe, orderly, and efficient circulation of traffic into and out of the site. Successive developments and City of Salem Capital Improvement Projects have since completed portions of the conditions of approval dictated in the original decision.

The following conditions of approval from CPC-ZC06-6 have been constructed and no longer are required:

1. Condition 2: The intersection of Battle Creek Road SE and Kuebler Boulevard SE shall be improved to provide exclusive eastbound right-turn lane.
2. Condition 3: The south side of Kuebler Boulevard SE shall be widened to meet City of Salem Standards with curb, sidewalk, and bike lanes. The widening shall extend from 1500 feet west of Battle Creek Road SE to the Interstate 5 ramps to provide an additional lane for a total of two eastbound lanes.
3. Condition 4: Dual left-turn lanes shall be constructed on eastbound and westbound Kuebler Boulevard SE at 27th Avenue SE. Only one eastbound left-turn lane will be striped as there is only one receiving lane. The intersection of Kuebler Boulevard at 27th Avenue SE shall also be improved to provide an exclusive eastbound right-turn lane.
4. Condition 5: The developer shall construct left-turn lanes and pedestrian refuge

islands where appropriate.

5. Condition 7: The developer shall provide right-in access from Kuebler Boulevard SE with a design that minimizes impact to through vehicles and provides a safe driveway crossing for bicycle and pedestrian traffic, the final design of which to be approved by the Salem PW Director. In addition, the developer shall complete the widening of the eastbound lanes of Kuebler Boulevard SE west to Commercial Street SE. This additional widening of approximately 1300 feet of Kuebler Boulevard SE is considered as payment for a grant of access on Kuebler Boulevard SE to allow a right-in driveway on the Subject Property.
6. Condition 8: Offset the access driveway along Boone Road SE from Cultus Avenue SE at a location approved by the PW Director.
7. Condition 16: The funded City CIP project for improvements on Kuebler Boulevard SE as identified in the applicant's September 2006 TIA, and an exclusive right-turn lane at the westbound Kuebler Boulevard SE intersection with 27th Avenue SE.

The following conditions are what remain for Public Works of the CPC-ZC06-6 conditions of approval and are included in the conditions of approval found on page 2 above:

1. Condition 1: The intersection of Battle Creek and Boone Roads SE shall be improved to include a traffic signal with an eastbound left-turn lane. The southbound left-turn lane shall be lengthened to provide a minimum of 300 feet of storage.
2. Condition 2: The intersection of Battle Creek Road SE and Kuebler Boulevard SE shall be improved to provide a northbound left-turn lane with a minimum of 300 feet of storage. To provide the necessary northbound left-turn storage at this intersection with the southbound left-turn lane storage at Battle Creek and Boone Roads, side-by-side left-turn lanes shall be constructed as approved by the Public Works Director.
3. Condition 4: Install striping for dual left-turn lanes on westbound Kuebler Boulevard SE at 27th Avenue SE. For the westbound left-turn lanes, an additional receiving lane shall be constructed which will drop immediately south of the subject property's driveway on 27th Avenue SE.
4. Condition 6: Pay \$5,000 for traffic calming devices (such as speed humps or other traffic calming measures) to be used in the residential neighborhood south of the proposed development as determined through the City's Neighborhood



Traffic Management Program.

5. Condition 10: The developer shall provide sidewalks along all street frontages. The sidewalk shall be located along the curb line only where needed to reduce conflicts with the previously mitigated wetland areas; all other sidewalks shall be located parallel to and one foot from the adjacent right-of-way.

Pursuant to SRC 803.015, the applicant was required to provide a Transportation Impact Analysis (TIA) to identify the impacts of this proposed development on the public transportation system in the area, and construct any necessary mitigation measures identified in that report. The applicant submitted a TIA, prepared by Kittelson & Associates and dated May 31, 2018. The City Traffic Engineer reviewed the TIA and determined that the report meets the requirements of SRC 803.015.

The following mitigation measures are recommended in the TIA and shall be required as conditions of approval:

1. The east site driveway on 27<sup>th</sup> Avenue SE should be constructed as a single-lane roundabout, with southbound right-turn by-pass lane to the site.
2. A stop sign should be installed on at the new south site driveway (southbound) approach to Boone Road SE.
3. The westbound left-turn lane at intersection of Kuebler Boulevard SE and Battle Creek Road SE should be restriped to provide 400 feet of storage. See Attachment C in the TIA revisions document dated August 9, 2018 for diagram.
4. All future landscaping, above-ground utilities, and site signage should be located and maintained to ensure adequate sight-distance is provided at the site driveways.

Condition 3 of CPC-ZC06-6 required that the south side of Kuebler Boulevard SE was widened to meet City of Salem Standards with curb, sidewalk, and bike lanes. The widening extended from 1500 feet west of Battle Creek Road SE to the Interstate 5 ramps to provide an additional lane for a total of two eastbound lanes. This condition was met by the Capital Improvement Plan project number 713513, which was accepted as complete on March 5, 2018. No additional right-of-way or street improvement is required on Kuebler Boulevard SE along the frontage of the proposed development. However, the applicant shall install the appropriate striping to the westbound dual left-turn lanes to allow for traffic flow into the future dual collection lanes on 27<sup>th</sup> Avenue SE.

The existing configurations of Boone Road SE and 27<sup>th</sup> Avenue SE along the frontages of the proposed development do not meet current standards for a Collector street



classification per the *Salem Transportation System Plan*. The applicant shall construct a half-street improvement along both frontages to Collector street standards as specified in the City Street Design Standards and consistent with the provisions of SRC Chapter 803.

Street standards require that sidewalks shall be located parallel to and one foot from the adjacent right-of-way (SRC 803.035(l)(2)(A)); however, the mitigated wetlands were placed between the future curb line and the right-of-way line along the frontages of Boone Road SE and 27<sup>th</sup> Avenue SE. These wetland channels conflict with the location of the sidewalk as required by the street standards. In order to protect the wetland areas, the sidewalk may be located along the curb line only as needed to reduce conflicts between the existing wetland channels and proposed improvements; all other sidewalks shall be located parallel to and one foot from the adjacent right-of-way pursuant to SRC 803.035(l).

No special setbacks are required because the existing rights-of-way meet or exceed the standards for the boundary street classifications.

**Criteria: SRC 220.005(f)(3)(C) Parking areas and driveways are designed to facilitate safe and efficient movement of vehicles, bicycles, and pedestrians**

**Finding**—The driveway access onto Boone Road SE is proposed to be located directly across from Bow Court SE and provides for safe turning movements into and out of the property. The driveway access onto 27<sup>th</sup> Avenue SE is proposing a single-lane roundabout with southbound right-turn by-pass lane to the site, as recommended by the TIA submitted. The eastbound right-turn only access from Kuebler Boulevard SE was approved by a previous Land Use Decision and was designed to facilitate safe and efficient movement of vehicles, bicycles, and pedestrians.

**Criteria: SRC 220.005(f)(3)(D) The proposed development will be adequately served with City water, sewer, storm drainage, and other utilities appropriate to the nature of the development**

**Finding**—The Public Works Department has reviewed the applicant's preliminary plan for this site. The water, sewer, and storm infrastructure are available within surrounding streets/areas and is adequate to serve the proposed development.

The portion of the subject property within Kuebler Gateway Subdivision is subject to the stormwater management plan adopted under SRC 71.180(c) that was submitted and approved with SUB14-01. New stormwater requirements in SRC Chapter 71 and PWDS became effective January 1, 2014. The proposed subdivision was submitted prior to the effective date of the new requirements. As specified in SRC 71.080(c), because the applicant submitted a stormwater management plan as a part of the subdivision application prior to the effective date of the new ordinance, future Site Plan

Review applications shall comply with the applicant's stormwater management plan instead of the stormwater requirements that became effective January 1, 2014. The applicant's engineer for the portion of the subject property within the Kuebler Gateway Subdivision indicated that the future development will comply with the previously submitted stormwater management plan.

The portion of the subject property outside the Kuebler Gateway Subdivision shall be designed and constructed to current water quality and flow control standards as found in SRC Chapter 71 and 2014 Public Works Design Standards (PWDS). The applicant's engineer for the portion of the subject property outside the Kuebler Gateway Subdivision submitted a statement demonstrating compliance with Stormwater PWDS Appendix 004-E(4)(b) and SRC Chapter 71. The preliminary stormwater design demonstrates the use of green stormwater infrastructure to the maximum extent feasible.

The applicant shall design and construct all utilities (sewer, water, and storm drainage) according to the PWDS and to the satisfaction of the Public Works Director. The applicant is advised that a sewer monitoring manhole may be required, and the trash area shall be designed in compliance with Public Works Standards.

#### **Driveway Approach Permit – 27<sup>th</sup> Avenue SE**

**Criteria—A Class 2 Driveway Approach Permit shall be granted if:**

- (1) The proposed driveway approach meets the standards of this Chapter and the Public Works Design Standards;**

**Finding—**The proposed driveway meets the standards for SRC 804 and Public Works Design Standards (PWDS).

- (2) No site conditions prevent placing the driveway approach in the required location;**

**Finding—**The construction of the roundabout, as recommended in the TIA provided by Kittelson & Associates, is required in order to locate the driveway along the frontage of 27<sup>th</sup> Avenue SE. There are no other site conditions prohibiting the location of the proposed driveway.

- (3) The number of driveway approaches onto an arterial are minimized;**

**Finding—**The proposed driveway is not accessing onto an arterial street.

- (4) The proposed driveway approach, where possible:**



- i. **Is shared with an adjacent property; or**
- ii. **Takes access from the lowest classification of street abutting the property;**

**Finding**—The proposed driveway is currently located with access to the lowest classification of street abutting the subject property.

**(5) Proposed driveway approach meets vision clearance standards;**

**Finding**—The proposed driveway meets the PWDS vision clearance standards set forth in SRC Chapter 805.

**(6) The proposed driveway approach does not create traffic hazards and provides for safe turning movements and access;**

**Finding**—The proposed driveway approach follows the recommendations found in the TIA submitted by Kittelson & Associates on May 31, 2018. No evidence has been submitted to indicate that the proposed driveway will create traffic hazards or unsafe turning movements.

**(7) The proposed driveway approach does not result in significant adverse impacts to the vicinity;**

**Finding**—The analysis provided in the TIA of the proposed driveway and recommended roundabout indicate that the proposed driveway will not have any adverse impacts to the adjacent properties or streets.

**(8) The proposed driveway approach minimizes impact to the functionality of adjacent streets and intersections; and**

**Finding**—The property is fronted by a Parkway street (Kuebler Boulevard SE), a Minor Arterial street (Battle Creek Road SE) and two Collector streets (Boone Road SE and 27<sup>th</sup> Avenue SE). The applicant is proposing the driveway approach to the lower classification of street and as recommended by a Transportation Impact Analysis provided by Kittelson & Associates. By complying with the requirements of SRC Chapter 804, constructing the required improvements found in the conditions of approval for CPC-ZC06-6, and following the recommendations of the TIA, the applicant has minimized impacts to the functionality of adjacent streets and intersections.

**(9) The proposed driveway approach balances the adverse impacts to residentially zoned property and the functionality of adjacent streets.**

**Finding**—The proposed driveway approach to 27<sup>th</sup> Avenue SE is located adjacent to a residentially zoned area. However, the direction of travel by the majority of drivers is into the commercially zoned area utilizing the single-lane roundabout. Installation of the southbound right-turn by-pass lane to the site, along with the single-lane roundabout, significantly limits cut-through traffic into the residential areas, and minimizes the effect on the functionality of the adjacent streets.

### **Driveway Approach Permit – Boone Road SE**

**Criteria**—A Class 2 Driveway Approach Permit shall be granted if:

- (1) The proposed driveway approach meets the standards of this Chapter and the Public Works Design Standards;**

**Finding**—The proposed driveway meets the standards for SRC 804 and Public Works Design Standards (PWDS).

- (2) No site conditions prevent placing the driveway approach in the required location;**

**Finding**—There are no site conditions prohibiting the location of the proposed driveway.

- (3) The number of driveway approaches onto an arterial are minimized;**

**Finding**—The proposed driveway is not accessing onto an arterial street.

- (4) The proposed driveway approach, where possible:**

- i. Is shared with an adjacent property; or**
- ii. Takes access from the lowest classification of street abutting the property;**

**Finding**—The proposed driveway is currently located with access to the lowest classification of street abutting the subject property.

- (5) Proposed driveway approach meets vision clearance standards;**

**Finding**—The proposed driveway meets the PWDS vision clearance standards set forth in SRC Chapter 805.



**(6) The proposed driveway approach does not create traffic hazards and provides for safe turning movements and access;**

**Finding**—The proposed driveway approach meets the criteria set by previous land use decisions and shall follow the recommendations found in the TIA submitted by Kittelson & Associates. No evidence has been submitted to indicate that the proposed driveway will create traffic hazards or unsafe turning movements.

**(7) The proposed driveway approach does not result in significant adverse impacts to the vicinity;**

**Finding**— The driveway approach to Boone Road SE is located directly across from Bow Court SE. Our analysis of the proposed driveway and the evidence that has been submitted indicate that the location of the proposed driveway will not have any adverse impacts to the adjacent properties or streets.

**(8) The proposed driveway approach minimizes impact to the functionality of adjacent streets and intersections; and**

**Finding**—The property is fronted by a Parkway street (Kuebler Boulevard SE), a Minor Arterial street (Battle Creek Road SE) and two Collector streets (Boone Road SE and 27<sup>th</sup> Avenue SE). The applicant is proposing the driveway approach to the lower classification of street and as recommended by the TIA provided by Kittelson & Associates. By complying with the requirements of SRC Chapter 804, constructing the required improvements found in the conditions of approval for CPC-ZC06-6, and following the recommendations of the TIA, the applicant has minimized impacts to the functionality of adjacent streets and intersections.

**(9) The proposed driveway approach balances the adverse impacts to residentially zoned property and the functionality of adjacent streets.**

**Finding**—The driveway approach to Boone Road SE is located directly across from a residentially zoned area. Locating the driveway directly across from Bow Court SE provides for safe turning movements into and out of the property. This additional driveway balances the adverse impacts to the residentially zoned area south of the subject property and will not have an adverse effect on the functionality of adjacent streets.

**Response to Citizen Comments**

**In response to the South Gateway Neighborhood Association comments about wetland mitigation and stormwater facilities issues:**

The wetland remediation work was completed per permit #NWP-2012-48 from Army Corps of Engineers. The proposed Costco improvements are based off of the remediated wetland location and will adhere to local, state, and federal requirements.

The Public Works Department thoroughly reviews stormwater designs to ensure compliance with the stormwater design standards. The onsite and frontage improvements will adhere to current stormwater design standards in order to receive design and plan approval. A thorough engineering design and plan review will occur following the Land Use decision.

**In response to the South Gateway Neighborhood Association comments about traffic and transportation concerns:**

*From Tony Martin, Assistant City Traffic Engineer:* The applicant was required to submit a Transportation Impact Analysis (TIA) as part of the Site Plan Review application. This TIA provided multiple recommendations in order to mitigate the impact to the transportation system. The City recognizes that there will be increased traffic with the proposed development; however, the City concurs with the overall findings of the TIA and will condition the recommendations in order to adequately mitigate the transportation impacts.

The applicant's traffic engineer will address the specific Transportation Impact Analysis issues. However, below are my comments on a few items that are City and process related:

**Section 1.a. – Trip Generation & Coverage**

Bullet #5 – “The TIA does not include traffic resulting from all potential development affecting the project area ...”

Although including “in-process” development in a TIA is not a requirement pursuant to City Code or Administrative Rules, the City required only the proposed development that has been permitted and is reasonably expected to be operational by the time the proposed development opens.

Bullet #6 – “The TIA's coverage area should have included Battle Creek to the north of Kuebler ...”



The TIA included an analysis of the following intersections, existing driveways, and proposed driveways:

1. Battle Creek Road SE and Kuebler Boulevard SE
2. North Driveway (Right-In) and Kuebler Boulevard SE (Existing)
3. 27th Avenue SE and Kuebler Boulevard SE
4. I-5 Southbound Ramps and Kuebler Boulevard SE
5. I-5 Northbound Ramps and Kuebler Boulevard SE
6. 27th Avenue SE and East Driveway (Future)
7. 27th Avenue SE and Boone Road SE
8. Southeast Driveway and Boone Road SE (Future)
9. Southwest Driveway (Future) and Boone Road SE and Bow Court SE (Existing)
10. Battle Creek Road SE and Boone Road SE

This study area includes the same scope that was required in 2006 for the Comprehensive Plan Change and Zone Change and it is appropriate for this development as determined by the City Traffic Engineer.

Bullet #7 – “Salem requires horizon year analysis periods of year of opening for development ...”

Pursuant to Salem Administrative Rule 6.33, in Table 6-33, the appropriate horizon year for a development that is “allowed under existing zoning” is the “year of opening.” This development is proposed to open in 2019, which is the analysis year in the TIA.

#### Section 1.b. – Traffic Flow & Management

Bullet #5 – “The proposed right-in access off of Kuebler Blvd. does not meet the City of Salem Access Management Criteria ...”

The right-in access was approved by City Council with the Comprehensive Plan Change and Zone Change. Table 5 of the approved 2006 TIA indicates there would be a total of 9,660 “net new trips” to the transportation system, but was

estimated there will be 14,440 daily trips to the site, which exceeds the 10,000 trip minimum threshold.

Bullet #19 – “Kuebler Boulevard is classified as a “parkway.” Approximately 1,200 feet of the site’s Kuebler Boulevard frontage was constructed without compliance to the City of Salem’s Transportation System Plan ...”

The City of Salem constructed Kuebler Boulevard improvements between Interstate 5 and Lone Oak Road S. The City utilized a lesser standard than is identified in the Salem Transportation System Plan in order to minimize costs and lessen impacts to adjacent properties, while providing the same capacity to the roadway system. No additional improvements are warranted along Kuebler Boulevard SE because it does not meet the definition of an underimproved street pursuant to SRC 803.005.

Prepared by: Jennifer Scott, Program Manager  
cc: File