



Exhibit K

# Oregon

Kate Brown, Governor

## Department of Transportation Region 2 Tech Center

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APPROVED  
City of Florence

Community Development  
Department

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Exhibit File Number

**DATE:** February 9, 2021

**TO:** Doug Baumgartner, PE  
Development Review Coordinator

*Arielle F*

**FROM:** Arielle Ferber, PE  
Traffic Analysis Engineer

**SUBJECT:** Three Mile Prairie Subdivision (Florence, OR) – Outright Use  
TIA Review Comments

ODOT Region 2 Traffic has completed our review of the submitted traffic impact analysis (dated October 22, 2020) to address traffic impacts due to development northwest of the US 101 at Munsel Lake Road intersection in the city of Florence, with respect to consistency and compliance with ODOT’s Analysis Procedures Manual, Version 2 (APM). The APM was most recently updated in October 2020. The current version is published online at: <http://www.oregon.gov/ODOT/TD/TP/Pages/APM.aspx>. As a result, we submit the following comments for the City’s/County’s consideration:

Analysis items to note:

- Region Traffic assumes the land use and density is consistent with the City’s code as cite in the report.

Analysis items to be addressed:

1. Table 2c references 4ST values from Exhibit 4-1 of ODOT’s APM for Munsel Lake Road and 46<sup>th</sup> Street. However, per Exhibit 4-2 of ODOT’s APM the two intersections should be compared to the 3ST critical/90<sup>th</sup> percentile crash rate of 0.293 as the driveway volumes are low compared to the opposite minor leg. This would flag the US 101 at Munsel Lake Road intersection for further investigation.
2. Per Figure 3, 2020 Design Hour Volumes are not balanced between the intersections of US 101 at Munsel Lake Road and Fred Meyer Driveway (difference of 40 vehicles northbound and 25 vehicles southbound).
3. Per Figure 4:
  - The trip distribution adds to 103%, with an imbalance between Fred Meyer Driveway and 47<sup>th</sup> Street and the omission of the SB through percentage at 47<sup>th</sup> Street.
  - 2023 Phase 2 there should be five trips traveling NB at the US 101 at North Access intersection, not four.

- 2026 Phase 3 has 31 trips traveling SBT at the US 101 at North Access intersection, however per the trip distribution this movement should have zero trips. This error is carried through Figure 7 as well as the analysis.
- 4. Per Figure 5, with the exception of the SBT movement at the US 101 at North Access intersection, the background volumes appear to be the 2020 DHV volumes and have not had the 2.3% annual growth rate applied to them.
- 5. Per Figure 6, 2023 Build w/ Three Mile Prairie + Cannery Station condition at the US 101 at 47<sup>th</sup> Street intersection the SBT movement should be 747, not 811.
- 6. Per Figure 7, 2026 Build w/ Three Mile Prairie + Cannery Station conditions at the US 101 at North Access SBT movement should be 789, not 820.
- 7. Synchro errors recommended to be corrected:
  - 2023 Build w/ Three Mile Prairie + Cannery Station
    - US 101 at 47<sup>th</sup> Street WBL and WBR traffic volumes have been flipped
    - US 101 at 47<sup>th</sup> Street SBT should be 747, not 811
  - 2026 Build w/ Three Mile Prairie + Cannery Station
    - US 101 at North Access SBT should be 789, not 820
- 8. Typographical errors recommended to be corrected:
  - Pipeline Projects: Discusses adding Phase 1 of Cannery Station site trips to 2023 and 2026, however, it appears full buildout of Cannery Station site trips were applied to the 2026 analysis.
  - Table 5:
    - US 101 at Munsel Lake Road SBL movement in the Build Cannery Station Phase 1 delay as 9p.2 when it should be 9.2.
    - US 101 at 47<sup>th</sup> Street incorrectly flipped results for the SBL and WBL movements in the Build Cannery Station Phase 1 and Build Three Mile Prairie & Cannery Station results.
  - Table 6: US 101 at 47<sup>th</sup> Street WBL and WBR queue lengths should be 125 feet and 100 feet, respectively, not 75 feet.
  - Figure 3:
    - US 101 at Munsel Lake Road has a southbound left-turn lane (CTL)
    - US 101 at 46<sup>th</sup> Street has a westbound left-through-right lane

Proposed mitigation comments:

- 9. ODOT maintains jurisdiction of the Oregon Coast Highway No. 009 (US 101) and ODOT approval shall be required for all proposed mitigation measures to this facility.
- 10. This study has assumed at the US 101 at Munsel Lake Road intersection the following improvements will have been installed by someone other than the applicant by the analysis year (2026):
  - Exclusive westbound left-turn lane with 250 feet of storage
  - Exclusive northbound right-turn lane with 150 feet of storage

However, Region Traffic does not recommended assuming these improvements will have been built by the analysis year unless they are currently funded projects. If the City does not identify the improvements as currently funded, the study should not include them as background improvements.

Thank you for the opportunity to review this traffic impact analysis. As the analysis software files were not provided, Region 2 Traffic has only reviewed the submitted report. As the above comments will merit the need for reanalysis, we look forward to a second round of review at which time we will comment on any and all proposed mitigation measures affecting the state highway system. It is likely comments #2 - #7, and #10 will have an effect on the operational analysis results which may be significant enough to have an effect on the conclusions of the study. If there are any questions regarding these comments, please contact me at (503) 986-2857 or [Arielle.Ferber@ODOT.state.or.us](mailto:Arielle.Ferber@ODOT.state.or.us)