

File # VR-2019-003 - Variance: Building Height
 PUBLIC COMMENT on the APPLICATION for LAND USE ACTION
 Submitted by: Chris Ortolano, 11088 SE 40th Ave, Milwaukie, Or 97222 (503) 353-3000

I recommend a 30 day extension of the public comment period for the City of Milwaukie planning commission and citizens to fully consider and evaluate the impacts of the variance.

This based on the lack of full disclosure by the applicant as to impact of the variance request on the updated calculations with regards to the unit matrix, and total number of occupants.

In the circumstance that there is no extension beyond the 7 day public comment period ending on May 28, 2019, I oppose VR-2019-003 given the impacts of additional occupants as stated:

VR-2019-003 will allow for more occupants with concomitant negative impacts

1. The Preapplication Appointment Worksheet, dated January 11, 2018, proposed 228 new apartment bedrooms, with a unit matrix included in Diagram 01 below.

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UNIT MATRIX 12/11/2017		217374 MONROE APARTMENTS					LRS ARCHITECTS						
OPTION 2 UNIT ANALYSIS							Target	Proposed	Target	target	Target		
	RSF	GSF*	Deck (D)	storage (S)	efficiency	Units	# of Units	RSF TOTAL	# of Units	RSF TOTAL	PROPOSED MIX	TARGET MIX	
Studio	unit type 1	500	0	75	15		18	9,000	18	8,800	8%	7%-8%	
2 bedroom, carriage L2	unit type 5	1,020					16	16,320	16	16,320	7%		
1 bedroom, carriage L3	unit type 6	750					12	9,000	12	9,075	6%		
1 bedroom, 1 bath	unit type 2	625	0	95	18		108	67,500	86	53,750	40%	45%-50%	
2 bedroom, 2 bath	unit type 3	975	0	123	21		60	58,500	73	70,785	33%	35%-40%	
3 bedroom, 2 bath	unit type 4	1,200	0	70	16		14	16,800	15	18,480	7%	7%-8%	
AVE RSF		806.60					220	228	177,120	220	177,210	100%	

RSF MEASURED TO THE INSIDE FACE OF STUDS AND EXCLUDES DECKS AND STORAGE.
 GSF* MEASURED TO THE CENTERLINE OF SHARED UNIT WALLS, INCLUDES EXTERIOR WALLS AND HALF THE BREEZEWAY, DECK AND DECK STORAGE NOT INCLUDED.
 EFFICIENCY = RSF/(GSF+D+S)

Diagram 01: Monroe Apartments Unit Matrix submitted on January 11, 2018. Total number of bedroom units calculated as follows:

Unit Type 01: Studio	1 bedroom x 18 =	18 bedroom units
Unit Type 02: 1 bedroom	1 bedroom x 108 =	108 bedroom units
Unit Type 03: 2 bedroom	2 bedroom x 60 =	120 bedroom units
Unit Type 04: 3 bedroom	3 bedroom x 14 =	42 bedroom units
Unit Type 05: 2 bedroom	2 bedroom x 16 =	32 bedroom units
Unit Type 06: 1 bedroom	1 bedroom x 12 =	12 bedroom units

Total number of bedroom units proposed on January 11, 2018 = 332 bedroom units x 2 occupants per unit (maximum allowed by law) = 664 potential occupants. *The variance request does not indicate how the height enhancement would modify the total number of occupants.*

A 30 day extension to review VR-2019-003 application for land use action is requested from the Planning Commission *to consider how additional proposed occupants will impact the following:*

VR-2019-003 will allow for more occupants and will constrict traffic at 37th and Washington.

1. The location of a single driveway at the 37th and Washington to accommodate the daily commuting patterns of up to 634 apartment dwellers is not only inadequate, it is also unwise.
 - a. The traffic intersection at 37th and Railroad is already constrained by two large concrete medians, which constitute a quiet zone, thus impeding the flow of traffic.

VR-2019-003 will allow for more occupants and will impact surface street intersections

1. The proposed density requirements exceed the carrying capacity for traffic at the following critical interactions which are compromised by railroad crossings
 - a. 37th and Railroad Ave is a significant intersection used to access Highway 224 and is already compromised by a railroad quiet zone treatment.
 - b. SE Campbell and SE Monroe is a significant intersection used to access Highway 224 and the Milwaukie Marketplace and is already uniquely compromised and by a railroad quiet zone treatment.
 - i. The SE Campbell and SE Monroe intersection is further comprised by a unique right turn right of way to prevent traffic backups on SE Monroe.

VR-2019-003 will allow for more occupants and introduce additional vehicle congestion

1. Given the current single driveway configuration, VR-2019-003 would allow for further traffic congestion due to the introduction of an unstated number of additional vehicles on a daily basis. These additional vehicles may include, but are not limited to
 - a. Rideshare services such as Uber and Lyft.
 - b. Grocery delivery services such as Amazon Prime and Imperfect produce.
 - c. Product delivery services such as Amazon, Walmart, and other major retailers.
 - d. Family, friends and neighbors who wish to visit apartment occupants.
 - e. Traffic associated with any additional home based businesses.

VR-2019-003 will allow for more occupants during a period of railroad expansion

1. The proposed introduction of an additional railroad track, aka double-tracking, suggests an increase in the number of railroad trains each day thus adding further congestion to the intersection at 37th and Adams.

VR-2019-003 will allow for more occupants to come in conflict with the Monroe St. Greenway

1. The proposed introduction of the Monroe Street Greenway, Washington Street alignment would put the new bicycle pedestrian path in the exact same location at 37th and Washington as the proposed Monroe St. Apartments driveway. The co-location of a single driveway 664 or more occupants juxtaposed with a bicycle pedestrian path creates a public safety hazard for automobile-bicycle and automobile-pedestrian accidents.

VR-2019-003 will allow for more occupants and increase public health and safety risks. The public health and safety of the citizens in the Hector Campbell and Ardenwald neighborhoods will be compromised by cut-through traffic during the following periods.

- a. Morning and afternoon rush hour traffic
- b. Morning and afternoon school bus traffic
- c. Ongoing and increasing railroad traffic and congestions due to railroad crossings
- d. The impacts on Highway 224 with the additional occupants requested by VR-2019-003 pose and additional traffic liability as the highway intersections at Hwy 224 and Oak and also at Highway 224 and International way are not subject to receive any additional signage, cross-walks or additional public safety measures.

VR-2019-003 will allow for more occupants and does not assess the combined impacts of any additional occupants proposed at the Murphy site and those anticipated traffic impacts

VR-2019-003 will allow for more occupants and does not assess the combined impacts of any additional occupants proposed or the Clackamas County site those anticipated traffic impacts

In conclusion, the variance VR-2019-003 requested to increase the height of the building corresponds to a direct correlation with an increase in density, which we are opposed to for the reasons stated above.

At this time, we respectfully request that the planning commission postpone any decision on VR-2019-003 until both the city and citizens who will be impacted by the variance are allowed an adequate amount of time (minimum 30 days) to review the impacts of additional occupants as a consequence of height enhancement request proposed in VR-2019-003.

Clackamas County Fire District #1

Fire Prevention Office



E-mail Memorandum

To: City of Milwaukie Planning Department
From: Izak Hamilton, Fire Inspector, Clackamas Fire District #1
Date: 5/10/19
Re: VR-2019-003, Monroe St. & 37th Ave., Milwaukie, OR

This review is based upon the current version of the Oregon Fire Code (OFC), as adopted by the Oregon State Fire Marshal's Office. The scope of review is typically limited to fire apparatus access and water supply, although the applicant must comply with all applicable OFC requirements. When buildings are completely protected with an approved automatic fire sprinkler system, the requirements for fire apparatus access and water supply may be modified as approved by the fire code official. The following items should be addressed by the applicant:

A Fire Access and Water Supply plan is required for subdivisions and commercial buildings over 1000 square feet in size or when required by Clackamas Fire District #1. The plan shall show fire apparatus access, fire lanes, fire hydrants, fire lines, available fire flow, FDC location (if applicable), building square footage, and type of construction. The applicant shall provide fire flow tests per NFPA 291, and shall be no older than 12 months. Work to be completed by experienced and responsible persons and coordinated with the local water authority.

- Prior to the start of the project, a pre-construction meeting shall be held with Clackamas Fire District #1. The project manager/contractor is responsible for developing a written fire safety program. This program shall be made available for review by Clackamas Fire District #1. The plan should address the following:

- a. Good Housekeeping
- b. On-site security
- c. Fire protection systems
 - i. For construction operations, installation of new fire protection systems as construction progress
 - ii. For demolition operations, preservation of existing fire protection systems during demolition
- d. Development of a pre-fire plan with the local fire department
- e. Consideration of special hazards resulting from previous occupancies

- f. Protection of existing structures and equipment from exposure fires resulting from construction, alteration and demolition operations.

Access:

1. Provide address numbering that is clearly visible from the street.
2. No part of the building may be more than 150 from an approved fire department access road.
3. The inside turning radius and outside turning radius for a 20' wide road shall not be less than 28' and 48', measured from the same center point.
4. Fire apparatus access roads shall have an unobstructed driving surface width of not less than 20' (26' adjacent to fire hydrants) and an unobstructed vertical clearance of not less than 13' 6".
5. Fire apparatus access roads must support a 75,000 lb. fire apparatus.
6. Buildings exceeding 30 feet in height shall require extra width and proximity provisions for aerial apparatus.
7. Provide at least two approved means of fire apparatus access to developments with more than 30 detached dwellings, or more than 100 multi-family dwelling units. Installation of fire sprinkler systems in all structures may exempt this requirement.
8. Access streets between 26 feet and less than 32 feet in width must have parking restricted to one side of the street. Access streets less than 26 feet in width must have parking restricted on both sides of the street. No parking restrictions for access roads 32 feet wide or more.
9. Gates across access roads must be pre-approved by the Fire District.

Water Supply

1. Fire Hydrants, Commercial Buildings: Where a portion of the building is more than 400 feet from a hydrant on a fire apparatus access road, as measured in an approved route around the exterior of the building, on-site fire hydrants and mains shall be provided.

Note: This distance may be increased to 600 feet for buildings equipped throughout with an approved automatic sprinkler system.

2. All new buildings shall have a firefighting water supply that meets the fire flow requirements of the Fire Code. Maximum spacing between hydrants on street frontage shall not exceed 500 feet. Additional private on-site fire hydrants may be required for larger buildings. Fire sprinklers may reduce the water supply requirements.
3. Prior to the start of combustible construction required fire hydrants shall be operational and accessible.
4. The fire department connection (FDC) for any fire sprinkler system shall be placed as near as possible to the street, and within 100 feet of a fire hydrant.
5. Comments may not be all inclusive based on information provided.

Notes:

Emergency responder radio coverage must be tested or provided due to the following:

- 1.Any building 50,000 square feet in size or larger.**