

DATE:	October , 2023
TO:	Dana Nichols, Planning Director
FROM:	Alex Atchison/Darren Sandeno
SUBJECT:	Planning Commission Rebuttal Matter
CC:	
PROJECT NUMBER:	217-8837-004
PROJECT NAME:	Gravel Point Development

Parametrix prepared a traffic assessment of the proposed Gravel Point development in Bandon, Oregon and presented the findings to the City of Bandon Planning Commission on October 5, 2023. Parametrix also was responsible for oversight of the critical areas investigation, geotechnical investigation and preparation of the conceptual landscape plan. The following tech memo summarizes the findings and responds to comments received at the Planning Commission.

Traffic Assessment

A traffic study is not required as part conditional use permit application for the Gravel Point development. However, the project team understands the community has concerns related to traffic and therefore proactively prepared a traffic assessment of the proposed development to identify any potential traffic related impacts.

The study followed the standards and guidelines for preparing traffic assessments as detailed in the most recent City of Bandon TSP (2000) and the Oregon Department of Transportation (ODOT) Analysis Procedures Manual (APM). The traffic assessment followed standard industry procedures and methodologies for collecting and using traffic count data, forecasting expected project trips, analyzing operations at nearby intersections, and then comparing the results to the City and ODOT standards. The traffic assessment and presentation given to the Planning Commission are included in Attachment A.

Below is a summary of the analysis and results:

- Traffic count data from 2021 and 2022 was adjusted following procedures in the ODOT APM for seasonal variations.
- Traffic count data was not adjusted for COVID; data from ODOT showed 2021 volumes higher than 2019 volumes, indicating a recovery to pre-pandemic traffic volumes.
- Applied 2% annual growth rate, consistent with 2021 counts to estimate 2023 and 2026 volumes. The annual growth rate of 2% is the average of the growth rates reported in the Coos County (2011) Transportation System Plan (TSP) and the Bandon Transportation Refinement Plan.



- Trip generation was estimated using rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, following standard industry practices.
 - The project is forecasted to generate 111 new trips in the PM peak hour: 68 trips are associated with the restaurant and the remaining are associated with the hotel. This is a conservative assumption as it is assumed the restaurant was a standalone use. It is anticipated that hotel guests will make up the majority of people patronizing the restaurant and therefore trips generated by the restaurant are likely less than 68.
- The PM peak hour of the adjacent street system was analyzed; generally PM peak hour volumes are higher than AM peak hour volumes on the adjacent roadway system. This was confirmed by evaluating 2022 hourly traffic volume data on US 101 at Seabird Drive.
- Traffic operations were evaluated using standard industry methodology detailed in the Highway Capacity Manual. Traffic analysis was performed to identify intersection operations conditions for comparison to adopted mobility standards. Mobility standards for the study intersections differ, depending on the jurisdiction.
 - The intersection of US 101/Seabird Drive is an ODOT facility; mobility standards are dictated by the volume-to-capacity (v/c) ratio, **not** level of service. The standard on Seabird Drive at US 101 is a v/c or 0.80 or less.
 - The intersection of Beach Loop Road/Seabird Drive is a City of Bandon facility; mobility standards for this intersection is LOS D or better.
- With the addition of the project trips, the off-site study intersections are forecast to continue to meet ODOT and City LOS and mobility standards for the PM peak hour.
 - The intersection of US 101/Seabird Drive is estimated to operate at LOS F with the project in the 2026 PM peak hour; however, the v/c ratio of Seabird Drive is estimated to be 0.73, below the 0.80 standard set by ODOT.
 - The level of service at the intersection of Beach Loop Road/Seabird Drive is estimated to be LOS A, well below the standard of LOS D set by the city.

Comments from 10/5/23 Planning Commission meeting

1. Mobility Standards

BMC 17.02

"Level of service" for transportation, a standard of a street's carrying capacity, based upon prevailing roadway, traffic and traffic control conditions during a given time period. The Level of Service (LOS) range, from LOS A (free flow) to LOS F (forced flow) describes operational conditions within a traffic stream and their perception by motorists/passengers. Level of Service is normally measured for the peak traffic hour, at intersections (signalized or un-signalized) or street segments (between signalized intersections).

City planning staff repeatedly noted that the intersection of US 101/Seabird Drive is expected to function at LOS F during the 2026 Build condition PM Peak hour, suggesting the need for mitigation measures. The analysis indeed confirms the LOS F projection for the US 101/Seabird Drive intersection. However, it's essential to emphasize that this intersection falls under the jurisdiction of ODOT and is subject to ODOT's mobility standards, as mentioned earlier.

Mobility standards on ODOT roadways are dictated by the volume-to-capacity (v/c) ratio, not level of service. The standard on Seabird Drive at US 101 is a v/c of 0.80 or less. The 2026 Build condition PM Peak hour v/c ratio is estimated to be 0.73, below the 0.80 standard set by ODOT.

The intersections within the City of Bandon's jurisdiction, specifically Beach Loop Road/Seabird Drive and Beach Loop Road/Site access, are projected to operate LOS A during the 2026 Build PM Peak hour. This performance comfortably meets the City's LOS D standard. The intersection of US 101/Seabird Drive falls under the jurisdiction of ODOT and is expected to operate with a volume-to-capacity (v/c) ratio of 0.73 during the 2026 Build PM Peak hour, which is lower than the ODOT standard of 0.80.

The need for mitigation should be determined by whether the project complies with the relevant standards. Since the project is projected to operate within these standards, there should be no requirement for mitigation.

2. AM Peak hour volumes

The project team heard comments regarding AM peak hour trip versus PM peak hour trips generated by the project. The PM peak hour is analyzed in traffic studies as generally PM peak hour volumes are higher than AM peak hour volumes on the adjacent roadway system. An evaluation of the 2022 hourly traffic volume data at the intersection of US 101 and Seabird Drive showed that volumes were highest during the PM peak.

For the proposed project, the AM peak hour trip generation amounts to 51 vehicle trips (46 from the hotel and 5 from the restaurant), in contrast to the 111 vehicle trips estimated during the PM peak hour. Additionally, given the lower overall background traffic on the roadway system, the intersections studied are expected to function with less delay during the AM peak hour compared to the PM peak hour.

3. Adequate pedestrian facilities on Beach Loop Road

The project team heard comments about the lack of adequate pedestrian facilities on Beach Loop Road. As of May 2023, The City of Bandon is currently underway on a study that would update the 2000 TSP and address the gaps in walking, cycling, and public transportation infrastructure and develop realistic projects for implementation. Part of this planning would include a Bandon Beach Loop Pedestrian Path. This study aims to address pedestrian safety concerns on Beach Loop Road, from Seabird Avenue to Seventh Street.

The project team is proposing to incorporate a trail system on the project site that will help address pedestrian circulation in the area. The trail system will allow public

accessibility to scenic views on site, in accordance with the **City of Bandon Scenic Resource Inventory**. The project team will also continue to coordinate with City staff to make sure any pedestrian improvements along the project frontage are compatible with the City's plans for the Bandon Beach Loop Pedestrian Path.

4. Additional roadway connections and circulation

Currently, the project team is suggesting a connection between Carter Street and Beach Drive in response to a request from the City of Bandon. Concerns have been raised within the community regarding the potential for hotel guests to use Carter Street for access. To address these concerns related to local traffic, the proposed access could close to through traffic, permitting emergency access and access for City of Bandon staff responsible for maintaining the city-owned wetlands located to the south of the proposed project site.

Furthermore, both internal and external signage at the project site can be employed to guide hotel guests towards using Beach Loop Road as their primary route for accessing the property. Notably, mapping applications such as Google Maps and Waze gather relevant metadata, including details like roadway classification, capacity, and traffic conditions to determine suggested routes. Roads with higher classifications, such as collector roadways, receive preference over smaller, local streets, especially when congestion is minimal or absent. Traffic analysis indicates that Beach Loop Road possesses sufficient capacity to accommodate the expected future traffic. The city classifies Beach Loop Road as a collector roadway, which justifies the assumption that mapping software will logically direct hotel guests to access the Gravel Point development via Beach Loop Road.

Geotechnical Report

A geotechnical report and addendum (specifically addressing the 'Landslide & Slope Stability' designation) for this project were prepared for the Gravel Point project dated 10.19.22 and 8.16.23 respectively by licensed geotechnical engineers at The Galli Group. This information has been provided to the City since the 10/05/23 Planning Commission meeting.

The content of the report is supportive of the development as has been proposed to within the master plan documents provided to the City from a geotechnical perspective with the understanding that the specific technical measures & methods recommended are adhered to during design & construction.

Critical Areas Report

A final critical areas report was prepared and submitted to the Department of State Lands. The field investigation, analysis, and preparation of the report were prepared by Turnstone Environmental. Turnstone Environmental specializes in critical areas investigations/delineations and all work was conducted by a qualified field biologist. The report was approved by DSL 9.28.23 (DSL #2023-0242). The report indicated 8 wetlands total (1.57 ac) - Wetlands 1 & 2 within the report fall within the interdunal wetland definition

are Aquatic Resource of Special Concern (ARSC). The current site plan indicates no impact to these wetlands. Based upon the current site plan, ~.3 ac of wetland impact are anticipated with mitigation at a 2:1 ratio in the form of creation and buffer enhancement.

Landscape Plan

The initial landscape plan submitted with the project provided a planting scheme that was a placeholder given how early it is in the project. Given some of the comments related to the initial plan and the draft palette, the development team coordinated effort a local plant expert within the Bandon community, Darcy Grahek owner of Stillwater Natives Nursery with the understanding that as the project progresses, the development team will continue to coordinate with Darcy on an ongoing basis to ensure the plant material palette aligns with her understanding and that specific methods be employed during construction to ensure plant mortality is minimized. Further discussion centered around the development team’s desire to avoid unnecessary chemical applications as part of the maintenance program and defer to natural means.

Comments from 10/5/23 Planning Commission meeting

1. Failure to conduct geotechnical study

A few members of the community had expressed concern that the Gravel Point project had failed to conduct a geotechnical study and had questioned the suitability of the proposed development as related to the geotechnical characteristics to the site. More specifically, a small part of the western portion of the site falls within a ‘Landslide & Slope Stability’ hazard area.

The GAR is not required to accompany the conditional use permit as a concurrent review. It can be reviewed along with the Zoning Compliance review process and is considered an Administrative decision.

BMC 17.78.030 Geologic Assessment Review

C. Application, review and appeals for a Geologic Assessment Review shall be in accordance with the requirements for plan review as set forth in BMC 16.04. Applications for a Geologic Assessment Review may be made prior to or concurrently with any other type of application required for the proposed use or activity. Geologic Assessment Review shall be completed prior to any ground disturbance.

2. Critical Areas report was not conducted and/or incomplete.

A few members of the community had expressed concern that the Gravel Point project had failed to conduct a formal critical areas report, that the staff that conducted the report were not qualified to do so, and that the report was incomplete.

BMC 17.102.020

B. Applicability

4) *The Planning Commission shall be the Reviewing Body for applications requiring exceptions to the provisions herein pertaining to significant wetlands, pursuant to Section 17.102.020.*

The Applicant has not requested an exception and is not subject to a Type III review process.

3. Landscape Plan did not represent a specific native plant palette.

A member of the community had expressed concern related to the conceptual landscape plan lacking alignment with native plant communities found within the Bandon region.

17.94.060 Landscaping

"Landscaping" means any combination of living plants such as trees, shrubs, plants, vegetative ground cover or turf grasses, and may include structural features such as walkways, fences, benches, plazas, works of art, reflective pools, fountains or the like. Landscaping also includes irrigation systems, mulches, topsoil, and revegetation or the preservation, protection and replacement of existing trees."

The applicant submitted a landscape plan that meet the Ordinance requirements. Per Public Comment, and not specific to a code requirement, the developer consulted with local plant experts and revised the proposed plan. An exact landscape plan at this stage in permitting is premature and will result in a modification to the conditional use permit at a later date. The site itself will determine what should be planted, and there has not been enough time to eradicate the gorse and properly examine the site. Regardless, a plan and planting list have been provided and the criteria to provide a landscape plan has been met.