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Received
Planning Division
09/20/2024

September 20, 2024

City of Beaverton Community Development
Attn: Lauren Russell
P.O. Box 4755
Beaverton, OR 97076

RE: LU22024-00629 Beech Pointe Subdivision (PS22024-00623) – Completeness Review

Dear Lauren,

This letter is intended to address the Notice of Incomplete Application dated August 9, 2024 for “Beech Pointe”, Beaverton File No **LU22024-00629**. Please find responses to specific completeness items below.

COMPLETENESS ISSUES: Pursuant to Section 50.25.1 of the Development Code, a complete application is one that contains the information required by the Director to address the relevant criteria, development requirements and procedures of this Code. The following items must be addressed and submitted in order for the application to be deemed complete:

A. CLEAN WATER SERVICES (CWS) DOCUMENTATION: Pursuant to Section 50.25.1.F of the City’s Development Code, all development proposals shall provide written documentation from Clean Water Services (formerly Unified Sewerage Agency) stating that water quality will not be adversely affected by the subject proposal. Therefore, the City recommends that you contact CWS in order to obtain the required documentation. For more information, please contact Lindsey Obermiller, Environmental Plan Reviewer at 503-681-3653 or ObermillerL@CleanWaterServices.org.

Please ensure that CWS reviews and signs off on a current version of the site plan. The one that was provided to CWS is an older version of the site plan that shows townhouses.

RESPONSE: An updated CWS SPL is provided with this resubmittal, confirming that no sensitive areas will be impacted by the subject proposal.

B. OTHER REQUIREMENTS: Provide documentation showing that the project proposed is permitted by, or satisfies the requirements of, other agencies and/or jurisdictions OR submit a schedule that details the forecasted submission and approval timelines for permits/applications to the respective agencies and/or jurisdictions. Please refer to preapplication conference notes for additional documents or requirements for this proposal. Common documents include a traffic memorandum, storm report, and flood elevation certificate.

1. **City of Beaverton Water Service Provider Letter.** A service provider letter is required for new connections to the water system and/or changes in water meter size. The form can be found at the following link:
<https://apps2.beavertonoregon.gov/CO/PublicWorks/WaterServiceProviderLetter.aspx>

RESPONSE: An approved City of Beaverton Water Service Provider Letter is provided with this resubmittal, as requested.

2. ***Sight Distance Analysis.*** *Although there is no development proposed at this time in relation to the proposed land division request, the submitted application package includes information that the proposed lots will be developed with middle-housing quadplexes. The submitted plans show two driveway access points along SW Beech Dr. The City is supportive of consolidating access to the numerous lots and future multiple buildings. To prevent potential conflicts in the future when development is proposed on the site, and to ensure that the proposed locations of the two driveways satisfy City requirements, the applicant must provide sight distance diagrams demonstrating adequate sight distance from both driveways. Sight distance must be provided as required in the City's Engineering Design Manual (EDM) Section 210.18 (and Table 210.12). The applicant is also referred to EDM Section 210.21.F.4 which states that "driveway approaches shall meet the minimum intersection sight distance requirements for street intersections."*

RESPONSE: The applicant appreciates the efforts of staff in raising the importance of this item at this stage. However, it is noted that any future consolidated driveways are not part of this request and are not currently under review. The applicant has taken note of the issue, and has completed sight distance analysis of potential future consolidated access points, although sight distance for any future development proposals will be submitted at the time those specific applications are prepared.

3. ***Photometric Analysis.*** *In association with the required right of way (ROW) improvements along the site's SW Beech frontage (which have been shown on the submitted plans), the applicant must submit photometric/lighting analysis to determine if the required sidewalk corridor improvements must include any new street lighting. The applicant is referred to EDM Section 450 for additional information/requirements related to street illumination.*

RESPONSE: Preliminary plans submitted with the application have been updated to include photometric analysis along the site's SW Beech Drive frontage meeting the requirements of EDM Section 450. Please see Sheet L1.0 for further details.

4. ***Leaking Underground Storage Tank Letter of No-Further Action.*** *The DEQ leaking underground storage tank cleanup database indicates that there was contamination from a heating oil tank on lots 4680 and 4700 along Beech Drive. The case files are 34-080411 and 34-05-1573, respectively. Please submit a letter on no-further action showing that site contamination has been remediated. If there is remaining contamination found onsite, an environmental report will need to be submitted showing how the site will be cleaned up per DEQ requirements.*

RESPONSE: The applicant has provided letters from DEQ for both 4680 and 4700 SW Beech Drive confirming receipt of reports and certifications from licensed contractors that cleanup of the heating oil underground storage tanks (HOT) at both sites has met DEQ's requirements. DEQ has registered these reports and certifications and closed its files on both properties in accordance with its HOT Program "No Further Action" process. DEQ's "Information about Oregon DEQ's No Further Action Decisions" fact sheet is also included with this submittal.

- C. **PLANS AND GRAPHIC REQUIREMENTS:** *All of the following information is required as part of the application checklists. Please provide all requested information on the appropriate plan sheets.*

1. **EXISTING CONDITIONS PLAN**
 - a. Vicinity map.
 - b. All existing lot sizes, lot lines, and dimensions.
 - c. Dimension from centerline to edge of existing right of way.
 - d. Dimensions of all existing improvements, including setbacks.
 - e. Quantities, size (diameter breast height), genus, and species of all Significant Trees and Groves, Historic Trees, Trees within a Significant Natural Resource Area, Landscape Trees, Street Trees, and Community Trees, as applicable.

2. **PROPOSED PRELIMINARY PLAT**
 - a. Total gross acreage of the plat.
 - b. Total net acreage of the plat.

3. **GRADING PLAN**
 - a. Lot dimensions and lot sizes (square feet).
 - b. Topographical information, maximum 2-foot contours, of existing grades within the abutting 25 feet of the entire boundary of the subject site.
 - c. Location (on site and within the abutting 25 feet of the entire boundary of the subject site), quantities, size (diameter breast height), genus, and species of Significant Trees and Groves, Historic Trees, Trees within a Significant Natural Resource Area, and Community Trees, and identification of whether they are proposed to be removed or proposed to remain. All other trees measuring at least 10-inch DBH shall be shown on the plan. Community Trees measure at least 10inch DBH and are not trees that are grown for the purpose of bearing edible fruits or nuts for human consumption. Preserved trees shall be set aside in a separate tract. Please identify any trees 6-inch DBH or larger if you want to preserve those trees to meet the tree preservation and planting design standards.
 - d. Root zone area of each tree to be protected on site and within the abutting 25 feet of the entire boundary of the subject site. Root zone is defined as an area 5 feet beyond the drip line of the tree.
 - e. Construction disturbance areas and methods proposed to minimize construction impact including but not limited to the identification and location of construction fencing, the identification and location of erosion control measures, and the location of constriction access roads including access to the public right of way.

4. **UTILITY PLAN**
 - a. Lot dimensions and lot sizes (square feet).
 - b. Proposed topographical information showing two-foot contours.

5. **LOT INFORMATION**
 - a. North arrow, scale, and date of plan.
 - b. Identification of all lots proposed to be created including lot dimensions, lot sizes (square feet), and lot numbers.
 - c. Identification of each lot's dimensions, setbacks, and building envelope.
 - d. Label the front, rear, and side yards of each proposed lot and each abutting lot.
 - e. Location of all existing buildings and structures proposed to remain on the subject site and on all abutting properties.

RESPONSE: The applicant has revised the Preliminary Plan Set as requested.

PRELIMINARY STAFF COMMENTS (NOT COMPLETENESS ITEMS):

While not strictly completeness items, the following are matters that will need to be addressed prior to the Facilities Review Committee meeting. Please note that this list may not be exhaustive of all potential issues that may arise during development but are items that came to the attention of staff during completeness review:

1. **Planning:**

- *Single-Detached and Middle Housing Design Review. Please be aware that Lots 4 and 5 as shown will require a Single-Detached and Middle Housing Design Review Three application because Garages and Off-Street Parking Areas design standard S7 is not met and the corresponding design guideline G7a is a Type 3 guideline.*

RESPONSE: The applicant appreciates the efforts of staff in raising this item at this stage, and has reviewed the issue to ensure that the standard can be met. However, the applicant is not requesting design review approval at this time. Further, it is the opinion of the applicant that design options exist to allow development of both Lot 4 and 5 which would meet the standards of Standard 7. In any event, this issue will be appropriately addressed at the time of any future design review application submittal.

- *Beaverton School District SPL. The SPL provided with this submittal states that the lots will be developed with single-detached dwellings. Please be aware that an updated SPL from the school district will be required at the time of design review to propose a quadplex on each lot.*

RESPONSE: The applicant has been in clear communication with the School District regarding the proposed use of the site. The SPL has been issued to address the application as submitted and under review, and will be resubmitted for review to the School District if and when any subsequent land use applications arise.

- *Tualatin Valley Fire & Rescue SPP. The SPP provided with this submittal states that the lots will be developed with single-detached dwellings. Please be aware that an updated SPP from the fire district will be required at the time of design review to propose a quadplex on each lot.*

RESPONSE: The applicant has been in clear communication with TVF&R regarding the proposed use of the site. The SPP has been issued to address the application as submitted and under review, and will be resubmitted for review to TVF&R if and when any subsequent land use applications arise.

2. **Transportation Comments:**

- *Traffic Impact Study and Traffic Management Plan. The City must evaluate the proposed subdivision in terms of the potential highest development option. As is suggested in the application submittal package, future development on each of the six proposed lots will include individual quadplexes. Accordingly, up to 24 dwelling units may be realized on the site.*

From a transportation perspective, expected trip generation must be considered to ascertain potential impacts to the transportation system. The Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) is utilized to

calculate anticipated vehicle trip generation associated with the proposed project. In this case, the best reflected rate in the Manual that is closest in description to the proposed project is Land Use #220/Multi-family Housing (Low Rise).

The daily rate is critical to calculate to determine whether a full traffic impact study (TIS) must be prepared for the project pursuant to BDC Section 60.55.20. The City's threshold for a TIS to be prepared and submitted is when a project generates at least 300 daily vehicle trips. Utilizing the appropriate rate from the above referenced ITE Manual land use code, the resulting daily vehicle trip generation for a 24-unit residential development proposal is approximately 162 trips. Accordingly, a TIS will not be necessary for this proposed project.

Another critical consideration related to trip generation is associated with the potential need for the applicant to submit a Traffic Management Plan (TMP) pursuant to BDC 60.55.15. The threshold triggering the need for a TMP is "when development will add 20 or more trips in any hour on a residential street." A residential street is any portion of a street classified as a Local Street or Neighborhood Route and having abutting property zoned RMA, RMB, or RMC – SW Beech Dr is therefore considered a residential street.

The ITE Manual contains trip generation rates expected during both the morning (AM) and afternoon (PM) peak periods of traffic. For the potential 24 dwelling units, the AM peak period trip generation is 10 vehicles. The expected PM peak period trip generation is 12 vehicles. The proposed project therefore will not trigger the need for a TMP.

RESPONSE: The application as submitted requests approval of a 6-lot subdivision for single detached units, as permitted in the RMC Zone in accordance with BDC Table 20.05.20.A. The applicant has requested to defer Design Review on the site. The applicant is not required under BDC Sections 60.55.15 or 60.55.20 to complete transportation studies for uses which are not currently proposed or under review at this time. However, the applicant appreciates the staff analysis of trip generation provided above, and confirmation that neither a TMP nor TIS will be required for the proposed 6-Lot Subdivision.

- *Parking Stalls. Pursuant to BDC Section 60.30.10.7, "for all residential uses, any provided parking space shall not be less than 8.5-ft wide x 18.5-ft long." Based on the submitted plans, some of the proposed parking stalls in at least the larger parking lot will meet the standard depth dimension. This is a comment provided not in relation to the proposed land division but for the applicant's awareness as future development plans are prepared.*
- *Parking stalls closest to SW Beech. There are several parking stalls shown on the submitted plans adjacent to SW Beech. Pursuant to EDM Section 210.21.I.3, "on parking lot driveways that connect to a public or private street, there shall be no parking stalls within 20 feet of the street right of way or within 20 feet of the back of sidewalk on a private street." It does not appear that the proposed parking stalls adjacent to SW Beech satisfy the noted standard. This is a comment provided not in relation to the proposed land division but for the applicant's awareness as future development plans are prepared. The applicant may submit an EDM Design Exception to retain the parking stalls in their current location. Submittal of the Design Exception does not ensure that it will be approved.*

RESPONSE: The applicant appreciates staff raising the above items at this stage. However, vehicle parking beyond that required for the 6-lot subdivision for single-detached units currently submitted and under review will be addressed if and when any subsequent application is submitted in the future.

- *Garbage and Recycling. The submitted plans show a refuse/recycling enclosure adjacent to the larger proposed parking lot. The applicant should contact City staff for bin/container sizing requirements that will be determined by the size/number of residential units on the site. If the refuse/recycling area will need to be enlarged, this may impact the design of adjacent walkways and the parking lot. This is a comment provided not in relation to the proposed land division but for the applicant's awareness as future development plans are prepared. City Waste/Recycling Coordinator Elizabeth Cole can be reached at ecole@beavertonoregon.gov.*

RESPONSE: The applicant appreciates staff raising this item at this stage. However, garbage and recycling collection beyond that required for the 6-lot subdivision for single-detached units currently submitted and under review will be addressed if and when a subsequent application is submitted in the future.

3. **Site Development Comments:**

- *See CWS section 4.08.6.d, all existing impervious area that is going to be modified must use a pre-developed curve number of 75. The new proposed impervious area may use a CN of 98. CWS defines modified impervious area as "redevelopment."*

RESPONSE: The Preliminary Storm Drainage Report and Preliminary Plans have been revised as requested.

RESUBMITTAL


Please provide a full electronic resubmittal. All submittals should follow the City's naming policy. As a general guideline please separate materials into PDFs which contain the same material that would be provided in a submittal binder tab for ease of review.

Effective April 3, 2023, all new Land Use Applications and revisions must be submitted through <https://prod.buildinginbeaverton.org/>, which includes 24/7 access to an online portal with comprehensive project tracking and the ability to pay fees online!

*Please submit revised materials to the project beginning with **LU22024-00629**.*

RESPONSE: The applicant has provided a full application resubmittal, including all revised materials, and any unchanged materials.

Sincerely,
Pioneer Design Group, Inc.



Wayne Hayson
Planning Manager

Cc: file