

Lauren Russell

**From:** GOEKE John C <John.C.GOEKE@odot.oregon.gov>  
**Sent:** Friday, September 2, 2022 4:34 PM  
**To:** Lauren Russell  
**Subject:** [EXTERNAL] Comment on DR2022-0030 and LD2022-0015 (Cedar Hills Apartments)  
**Attachments:** City of Beaverton Public Comment Regarding Parking at Proposed Cedar Hills Apartments Development (003).docx

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Hello Lauren. Let me introduce myself. My name is John Goeke. I work in the ODOT Facilities Department and assist DMV with their projects. I got your name from Aneta from our ODOT Right of Way section. I have been discussing the Cedar Hills Apartments - DR2022-0030 and LD2022-0015 with DMV and there is a real concern about pedestrian safety on the site if the Cedar Hills Apartments are built.

I have attached a narrative from the DMV Region Manager from the Beaverton office. The narrative explains the DMV activities at the site and mentions the risk for pedestrian hazard with the DMV customers being forced to park off the site.

Please also note that the lot is currently used for parking by many of the local people which further reduces the number of spaces available for DMV and Harbor Freight customers. This reduction in parking will be magnified by dividing the site and limiting access to new secured parking at the apartment complex. Customers to DMV and Harbor Freight will be competing for open spaces and it will cause drivers to rush within the lot and in turn will jeopardize the safety of the pedestrians from cars hitting people in the lot as they rush to a vacant space. If the strain on the parking and pedestrian safety cannot be addressed by reducing the number of apartments, it may be necessary for the apartment complex to be redesigned so all the apartment parking is made unsecured public parking.

We ask that the development be redesigned or that the development be rejected due to the safety impact at the site.

Thank you for your time and please let me know if you have any questions,  
Best regards,

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## Comment on DR2022-0030 and LD2022-0015 (Cedar Hills Apartments)

The DMV currently occupies about 9,000 square feet at the northwest corner of the Cedar Hills Shopping Center. The lease that DMV has provides for 20 exclusive reserved and 80 non-exclusive parking spots. Harbor Freight (HF) adjoins DMV and is the other business space that will not be included in the proposed new development. HF has 60 spots included in its lease for parking.

The proposed plan would appear to include about 108 parking spots in the area outside of the new building. That would mean that 86 would be shared spots between DMV and HF.

DMV, unlike most other businesses, is one in which people must bring their vehicles. They bring their vehicles to take drive tests and for VIN inspections. VIN inspections can be on passenger vehicles, buses, semi-trucks, trailers, motorhomes or recreational vehicles. If the vehicle is inoperable or is a trailer, it must be towed to the DMV. Space is needed in the parking lot to accommodate the larger vehicles, trailers, or those being towed in. Currently, oversized vehicles are able to pull lengthwise into the space between rows in the northwest side of the parking lot behind the DMV.

Prior to the Covid-19 pandemic, the Beaverton DMV was one of the busiest offices in the state with 147,407 customers visiting the office in 2019. The highest number of customers was on 8/30/19 with 831, and the lowest was on 12/24/19 with 327. Over the course of 2019 we averaged 589.63 customers per day.

While we have not yet returned to pre-pandemic numbers, we have been gradually building back up. As of 8/15/22, the highest customer count was 623 on 7/1/2022 and have averaged 396.37 customers per day. We expect that as we get closer to the Real ID deadline of May 3, 2023, the customer count will increase sharply as Oregonians come into the offices to get this credential.

Customers do not visit the office evenly distributed throughout the day. Customers will arrive in the largest numbers before opening and during the first hour of the day. As more customers arrive, wait-times for services can increase. That means that while we may serve 100 customers in the first hour of the day, there may now be 100 more waiting their turn during that same hour. The customer demand for parking spaces is intensive due to the overlap in customers being served and customers waiting.

HF has a need for parking spaces as well. They sell merchandise that cannot be easily carried for a long distance due to its weight and/or size. They have held special sales in their parking lot spaces in front of their store. Due to the nature of their inventory, HF has a loading dock at the back of the northwest corner of the building that faces into the parking lot behind the DMV. They pull semi-trucks of merchandise directly against the dock taking up the space in that portion of the lot.

The Cedar Hills Townhomes are located across the street from the Cedar Hills Shopping Center on Willshire. Visitors and residents of these townhomes park on the streets surrounding the complex. Parking on the streets is most limited during the morning before people have left their homes for the day and in the evening when they return.

Parking on Willshire is parallel next to the townhomes and both parallel and angled next to the shopping center. There is additional street parking on Marlow, but none on Park Way. Across the street from the DMV on Marlow there are office buildings. Across the street on Park Way there is a service station,

medical offices, a hotel, and an adult-themed club. To the southeast side of the shopping center is an unnamed street between the shopping center and highway 217, which has no usable parking.

The intersection at Marlow and Park Way currently has painted crosswalks and 4-way stop signs. The intersection at Marlow and Wilshire has no crosswalk painted. There is a stop sign to go from Wilshire to Marlow, but none on Marlow. There is a 3 way stop from the unnamed street at Wilshire and has no crosswalks painted. None of the crosswalks has a crossing beacon.

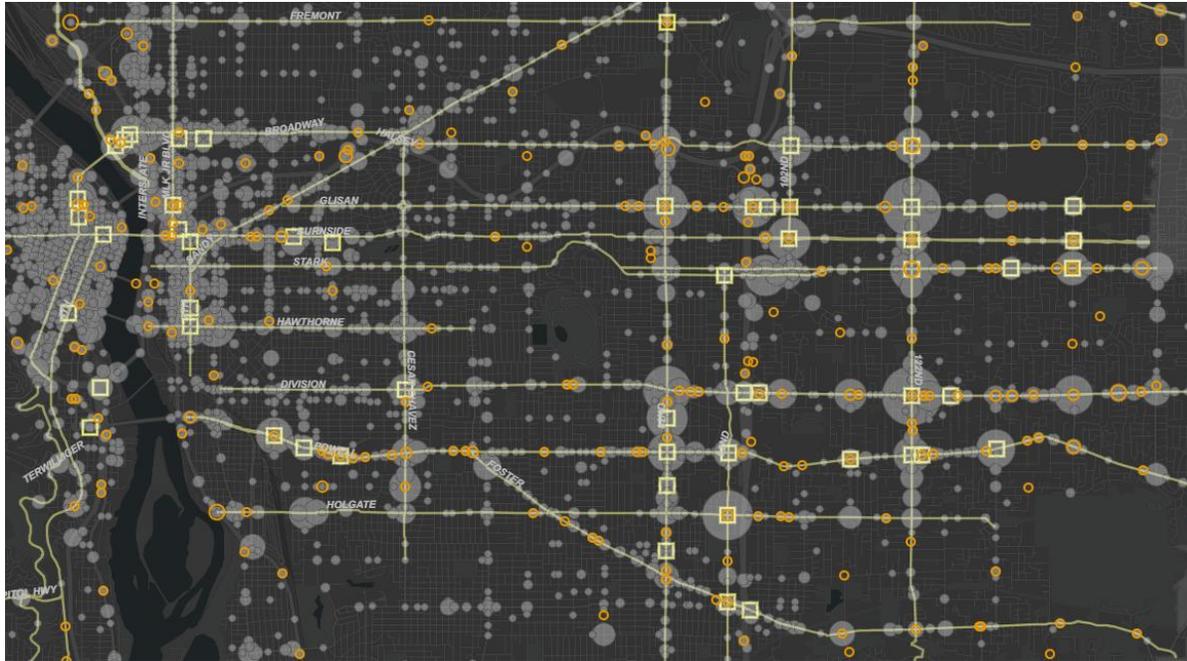
The Cedar Hills Apartments have proposed a building with 440 units with a total of 573 bedrooms (hand counted on plans, not verified by the developer). They are providing 436 parking spaces for the units inside the building, along with 18 for retail use.

We are concerned that there will be a demand for parking spots in excess of what is provided, and that the apartment residents and retail customers will compete with the DMV and HF customers and employees for parking in the lot outside of the building. This will then force DMV and HF customers and employees onto street parking spots in competition with Cedar Hills Townhome and office tenants.

The DMV is a business that nearly all Oregonians over the age of 16 visit at least once every eight years. Many of our visitors have physical limitations that prevent them from walking long distances between a parking spot and our building.

We are concerned about the safety of pushing so many Oregonians out onto street parking. Unlike residential parking, where people presumably are staying overnight or outside of most business hours, our customers will be crossing streets on foot at all times of the day.

Currently, Beaverton does not have the same degree of streets on which businesses and residences share space. To evaluate the safety of these streets, we have looked at the City of Portland which provides data about crashes on streets and on intersections. The streets and intersections with the most crashes are the ones that combine residential and businesses. [High Crash Network Streets and Intersections | Portland.gov](#)



We are very concerned that the Cedar Hills Apartments, as proposed, will push many people to park on streets, and force them to cross intersections not designed for that volume of pedestrian traffic. This will likely lead to increased crashes between people and cars.

To limit the competition in the DMV/HF parking lot, we could require parking stickers for all DMV, HF, and Cedar Hills Apartments. We would then tow any vehicles in the DMV/HF parking lot belonging to apartment residents, vehicles without parking stickers left over night, or for longer than 4 hours. This will address only some of the issue, as even brief parking done by visitors to the apartments will crowd out DMV/HF customers.

The Cedar Hills Apartment developer suggested that we could paint more parking stripes in the lot or meter the street parking. We are opposed to metering the parking on the street as this would harm the employees of DMV/HF and the residents of the Cedar Hills Townhomes by making them pay for the lack of parking provided, daily. This would be unaffordable and unacceptable to many.

The areas that the developer proposed painting more parking are in the northwest section of the parking lot behind DMV. If we plan to still allow HF to use their loading dock, this may not be feasible. The red rectangles below show the proposed spots to add parking. The space at the left would prevent HF from accessing its loading dock. The space to the right doesn't have enough room to add both angled parking and lanes on either side as the narrowest point between the parking spaces appears to be 63 feet and the narrowest is 71 feet. It may be possible to add a single row of about 10 spaces between. Striping the center would eliminate our oversized vehicle parking for VIN inspections.

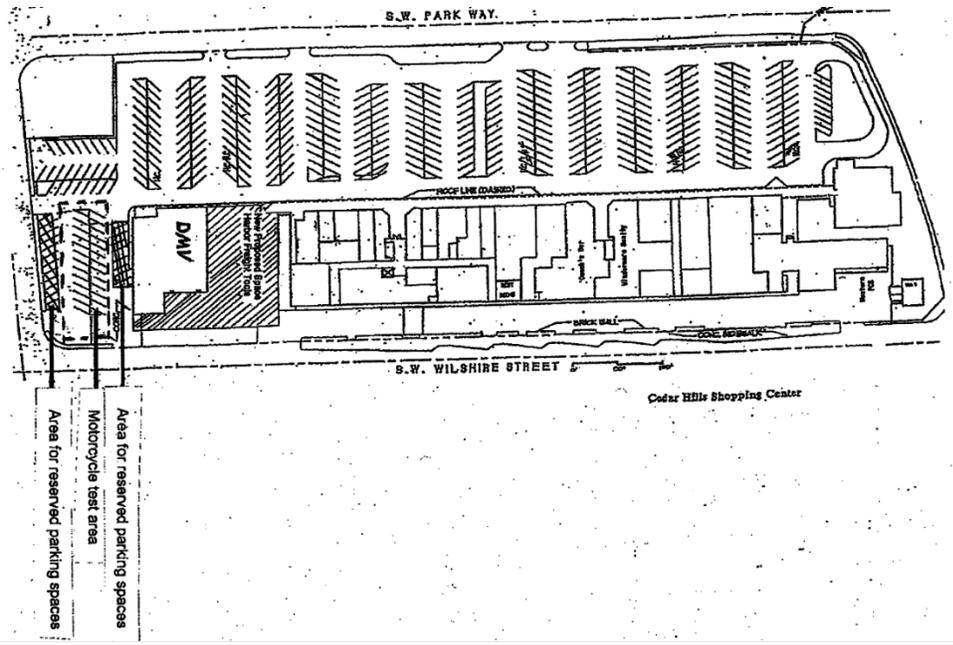


The developer could build a parking garage to accommodate all of DMV and HF needs, but he stated that was too expensive.

The crosswalks that are unstriped could be made safer by striping them. All surrounding crosswalks could have flashing beacons installed.

The developer could reduce the number of units being built to reduce competition, but even if that occurs, and there was no competition between apartment residents and DMV/HF customers, the number of spaces is insufficient for our current needs.

One of the features that had made the Cedar Hills Shopping Center appealing to DMV was the large parking lot. The parking lot as shown in our lease depicts a lot that spans the whole shopping center. Please note that what is hashed over as the motorcycle test area below was not ever used as striped parking spots.



This parking lot image is from our 2018 lease that goes through November 30, 2028. We have 20 exclusive reserved and 80 non-exclusive spots. We didn't take that to mean that we would be sharing ONLY those 80 spots with HF. We interpreted that to mean that out of the large parking lot for the shopping center, we would expect that 80 of those spots at any given time would be taken by DMV customers.

The parking for DMV/HF, as proposed by the Cedar Hills Apartments developer is insufficient to our needs. It will force people into street parking situations and onto intersections not equipped to safely allow the crossing of increased numbers of people.

We are requesting that the Cedar Hills Apartments plan be modified to increase the parking available inside the lot of DMV/HF customers.