



Christopher J. Brink, AICP
Director

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October 17, 2022

Jeremy Fadness, P.E.
WWC Engineering
1275 Maple Street, Suite F
Helena, Montana 59601

Delivery via email to:
jfadness@wwcengineering.com

RE: Preliminary Plat, Sufficiency Review
with Annexation
West Side Woods Phased Major Subdivision

Dear Mr. Fadness;

As the subdivider's listed agent, you are being provided notification that the preliminary plat application has been deemed *insufficient for review* at this time, per MCA Section 76-3-604 (2)(a)—(b):

...(a) Within 15 working days after the reviewing agent or agency notifies the subdivider or the subdivider's agent that the application contains all of the required elements as provided in subsection (1), the reviewing agent or agency shall determine whether the application and required elements contain detailed, supporting information that is sufficient to allow for the review of the proposed subdivision under the provisions of this chapter and the local regulations adopted pursuant to this chapter and shall notify the subdivider or, with the subdivider's written permission, the subdivider's agent of the reviewing agent's or agency's determination.

(b) If the reviewing agent or agency determines that information in the application is not sufficient to allow for review of the proposed subdivision, the reviewing agent or agency shall identify the insufficient information in its notification.

Please address the following items and elements noted below and resubmit the required information.

Items determined insufficient

Planning Staff Comments are as follows (note, Planning item numbering is per the most recent City of Helena preliminary plat application):

2. Analysis of how the proposed subdivision complies with the growth policy.

0.43 – References here are relative to meeting minimum city street standards (“...All aspects of the proposed streets will meet the city street standards...”) Is this accurate? While some sections of your application materials and variance disclaimer indicate that no variances are being sought other sections of your application material indicate otherwise.

An exception for block length is being sought as well as variances for sidewalk placement (see EA, Section 4.4 Roads). Please restate, rephrase, or otherwise verify this statement here or in the other applicable sections of your application package.

0.79 – Address inconsistencies relative to variances being needed but stated elsewhere that variances are not needed.

5. A legal description of the subject property, a copy of the currently filed plat or COS, and the last recorded deed for the subject property.

Review of your application indicated that the most recent COS (3360858) may not have been submitted. Please make sure that the current and most recent COS(s) has been submitted to staff.

29. When ownership of infrastructure improvements are intended to be transferred to the City affect a third-party easement, a copy of notification to that entity of the potential work within their easement.

Your application materials provide notices you sent to both Northwestern Energy and Century Link of the overall project and a request to provide any relative comments back. There is no indication that comments were provided back to the applicant nor did the notice specifically call out that work is anticipated to be done within their easements. Staff understands that it is proposed that their easements and underlying utilities would be relocated both within planned street rights of way and underground. Please provide from each of the third-party easement owners, written commitments to work with your development team toward that goal or proposal.

Preliminary Plat: Amended plat – amended blocks and lots noted?

The application does not provide sufficient information regarding the status of the proposed road right of way abandonments. Documentation was provided indicating that a process has been concluded by you and the County, but an amended plat that has been recorded has not been provided. Has one actually been approved and recorded or if not, what is the status of that process?

City Attorney comments are as follows:

In the Growth Policy Analysis, at page 5, section 0.79, it mentions variances are needed, but the dedicated variance document indicates no need for a variance. Please clarify in either place.

Transportation Systems comments are as follows:

I. Verify that the typical sections referred to in the PER narrative match the typical sections in the plans, i.e. numbering and asphalt thickness.

II. 2q. Transportation Systems cover page:

a. Please provide clarification to demonstrate compelling circumstances why each dead-end street is necessary. For example, why Brakeman Avenue cannot connect to Livezey Avenue as it did in a previous iteration.

b. Similarly, aside from reducing cut/fill quantities, please explain why “It would not be possible to construct” connections to existing and proposed streets. E.g., retaining walls are commonly used to overcome elevation differences.

III. Please submit deviation/variance requests for all proposed deviations from City Engineering Standards or City Code requirements; including but not limited to:

- a. Sidewalk placement on the right-of-way line instead of one-foot from the property line,
- b. Using minimum K-factors for crest and sag vertical curves of 12 and 26 respectively.
- c. The 100-foot radius horizontal curve at the construction of Hauser Blvd at Overlook Estates,
- d. The 60-degree intersection angle at Floweree Court and Park Drive,
- e. The intersection tangent length at Brakeman Avenue and Park Drive.

IV. Update TIS to reflect the following:

- a. Page 6. Manual Traffic Count. The TIS describes the use of traffic counts collected by MDT at Granite Ave & Euclid Ave (US 12) in September 2017. City staff indicated that, at the time of the MDT count, Granite Ave from Knight St to Woodward Ave was under construction. This construction may have significantly influenced travel demand in the study area. Further, standard practice is to utilize counts no less recent than 1-2 years from the date of TIS submittal. A new traffic count is needed at Granite Ave & Euclid Ave.
- b. Page 6. Manual Traffic Count. The TIS describes the use of traffic counts collected in August 2020 along Granite Avenue. The TIS indicates that Helena Public Schools were not in session at the time the August 2020 traffic counts were collected. Due to the presence of Kessler Elementary School along Granite Ave, as well as the significant travel demand impacts of the COVID-19 pandemic in August 2020, new turning movement counts are needed at all study intersections.
- c. Page 6. Manual Traffic Count. TIS applied seasonal adjustment factor of 0.93 to Granite Ave traffic data based on MDT permanent count station on Custer Ave near Brady Street. Given the context of Granite Ave and the presence of Kessler Elementary School, no seasonal adjustment factor is recommended, provided traffic counts occur on a non-holiday mid-week day during the school year.
- d. Page 6. Project Phasing. TIS states that Phase 4 construction and final plat will occur in 2029. Subsequent report sections indicate full buildout by 2027. Clarify anticipated year of buildout.
- e. Page 6. Historic Traffic Data. The TIS utilized a 0.5% annual growth rate (AGR) based on 2010-2019 traffic volume growth history along Euclid Ave. The Greater Helena Area Long-Range Transportation Plan (LRTP) indicates an anticipated 1.3% AGR on Euclid Ave and 5.1% AGR on Hauser Blvd east of the Project. To maintain consistency with City of Helena planning and policy efforts, including anticipated housing and employment growth, growth forecasts should utilize LRTP growth rate on Euclid and an explanation if less than 5.1% on Hauser is used.
- f. Page 7. Trip Generation. TIS trip generation forecast uses ITE Trip Generation Manual 10th Edition data. City of Helena TIS requirements state that the most recent Trip Generation Manual is to be used for trip generation forecasting. The trip generation forecast should be updated to reflect Trip Generation Manual 11th Edition data.
- g. Page 8. Trip Generation. Trip generation forecast table (Table 2) should identify ingress and egress trips for each phase and each study period.
- h. Page 9. Trip Generation. TIS indicates 50% reduction was applied to Project trip generation forecast for AM and PM school peak periods. ITE Trip Generation Manual rates apply to the 7-9 AM

peak period; therefore, the full AM peak hour project trip generation forecast applies in both the AM commuter peak (7:45-8:00) and the AM school peak (8:15-8:30). The full AM peak hour Project trip forecast should be applied in the AM school peak period.

i. Page 9. Trip Distribution. The TIS report should describe the methodology used to develop the Project trip distribution forecast.

j. Page 10. Operational Analysis. The TIS indicates that intersection LOS analysis utilized Highway Capacity Manual – Special Report 209 and the Highway Capacity Software (HCS) version 7.8. The intersection LOS analysis should utilize latest edition, Highway Capacity Manual 7th Edition: A Guide for Multimodal Mobility Analysis and the corresponding HCS 2022 (version 8.1 or newer).

k. Page 10. Operational Analysis. The TIS includes 2020 Without-Project and 2027 With-Project scenarios. The TIS should also provide a “Future Without-Project” scenario to clearly identify Project-related impacts to study intersections.

l. Page 12. Operational Analysis. TIS identifies a future LOS deficiency at Granite Ave & Euclid Ave. No mitigation is identified. The TIS should identify potential strategies to mitigate the anticipated LOS deficiency at Granite Ave & Euclid Ave and identify the Project’s proportionate share of intersection improvement costs.

m. Appendix C. Traffic Count Data. Turning movement volume sheets identify a “Covid factor.” It is unclear how this factor was developed and applied. The TIS should clarify the justification and application of any volume adjustment factors.

n. Appendix C. Traffic Count Data. The correlation between 2017 intersection turning movement counts at Granite Ave & Euclid Ave (PDF pp.25-26) and volume diagrams (PDF pp.31-32) is unclear. Volume development from count sheets should be reviewed and clarified.

o. Appendix C. Traffic Count Data. The Project trips identified in the “Site Generated Traffic” diagrams on PDF p.33 do not match the total project trips identified in TIS report Table 2. Project trips should be reviewed and verified.

p. Appendix C. Traffic Count Data. “Total Projected Traffic” diagrams (PDF pp.34-35) do not distinguish commuter from school peak periods. Volume diagram labels should be reviewed and corrected.

q. Appendix E. Signal Warrant Analysis. The traffic signal warrant analysis describes the removal of northbound right-turn demand on Granite Ave at the Euclid Ave intersection. Given the lack of right-turn lane striping on the northbound approach, this adjustment is not recommended. A sensitivity analysis of reduced right-turn demand may be included, but each scenario should be documented. The northbound approach should be modeled as a one-lane approach for the purpose of volume warrant analysis.

r. Appendix E. Signal Warrant Analysis. The traffic signal warrant analysis should include site-generated trips and anticipated background growth. Future forecasts should assume daily volume peaking characteristics, similar to existing 24-hour counts.

s. General. The study area should clearly be identified in the report and on the vicinity map. The methodology for determining the study area should be described.

- t. General. The TIS is missing several components which should be included to better document Project impacts to the public transportation system. The following elements should be added:
- i. Sight distance analysis at any new connections to the public street network
 - ii. Parking analysis, including documentation of proposed on- and off-street parking supply relative to City of Helena Requirements.
 - iii. Crash analysis, including identification of crash rates and predominant crash types at all study intersections, based on five-year crash history data, and documentation of any anticipated project impacts to safety performance.
 - iv. Queuing analysis at Granite Ave & Euclid Ave.

Parks and Recreation comments are as follows:

Within the application to the City of Helena's City Park Evaluation, which has been completed by the developer's engineering firm, below are the comments from the Parks Department.

Listed under General Criteria question #3 "Are there noxious weeds on the property?" the answer to the yes/no question was No. Having a weed monitoring report to support the answer to question #3 will be helpful. Also, under Specific Criteria section B the box was checked indicating there is a scarcity of noxious weeds. Again, please provide a weed monitoring report to support the answer in section B under Specific Criteria.

Listed under General Criteria question #17 "Will cash-in-lieu be acceptable?" the answer to the yes/no question was Yes. Having a market study/evaluation done to determine the value of the dedicated park land will be necessary.

The Plat has not been updated to reflect the changes requested by the City County Parks Board and City staff. A request for an up to date and accurate plat for the project is very important to proceed.

Thank you for your submittal. We look forward to moving this project through the formal review and approval processes and we will work to expedite, when possible, the next phase of review and approval. Please do not hesitate to reach out to me directly at the number and email listed above. You may also reach out to a member of the planning staff.

Sincerely,



Christopher J. Brink, AICP
Director

CJB/cb

Cc: Derek Davis, Sussex Development
(derek@sussexconstruction)
File

Review and Submittal Timelines:

Original Submittal – 9/16/22
1st Completeness Review Sent – 9/22/22
1st Completeness Response – 9/23/22
Completeness Confirmed – 9/27/22
Sufficiency Review Started – 9/27/22
1st Sufficiency Review – 10/17/22