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November 16, 2022

Mr. Christopher Brink, AICP
City of Helena
Community Development Department
316 N Park Ave, Room 445
Helena, MT 59623

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

Dear Mr. Brink:

In response to your letter dated October 17, 2022, we have prepared additional information for the above-referenced project to address your comments and concerns. The following information reiterates your comments and our specific responses to each comment as follows:

Preliminary Plat Application:

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

Section 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.

Response: *This section has been updated to include that an exception allowed in the subdivision regulations for block lengths due to topography is being requested and no variances are being requested for the proposed subdivision. The EA has also been updated to remove reference to variances.*

2. **Section 0.79** - Address inconsistencies relative to variances being needed but stated elsewhere that variances are not needed.

Response: *This section has been updated to indicate no variances are being requested for the proposed subdivision.*

3. Section 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.

Response: The City has been provided with a copy of the most recent survey on file.

4. Section 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.

Response: New correspondence is included in the submittal from the power and gas utility as well as the cable utility. We have been working with City Engineering on the exiting water main design and will continue to work with the City on the existing water main through engineering approval of Phase 1 and 2.

Preliminary Plat Comments:

5. 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?

Response: The resolutions to abandon the rights-of-way have been reviewed and approved by the County Commission and the resolutions were included in the original submittal. The amended plats for the removal of these rights-of-way have been prepared and reviewed by County planning but have not been filed. The amended plat for Circle Place is complete and we are currently working on collecting landowner signatures before this survey can be filed. The amended plat for the rights-of-way on the south side of the property is prepared and ready for final County review. A discussion was held with City Planning on the existing 30-ft right-of-way on the southeast corner of the project between this project and Sussex Court. The City would like to dispose of this right-of-way and has already approved this via resolution. The amended plat for this area is waiting for a resolution between the applicant and the City on the purchase or transfer of this right-of-way to the applicant. Once this is resolved then the amended plat can be finalized and filed.



City Attorney Comments:

6. In the Growth Policy Analysis, at page 5, section O.79, it mentions variances are needed, but the dedicated variance document indicates no need for a variance. Please clarify in either place.

Response: This section has been updated to indicate no variances are being requested for the proposed subdivision.

Transportation System Comments:

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

Response: The PER and engineering plans have been updated.

8. Section 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.

Response: Additional explanation and justification for the dead-end streets is provided in the transportation section of the submittal.

9. 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,

Response: The plans were prepared to meet the draft engineering standards in anticipation that the draft standards would be adopted by the time we submit engineering plans for review for each phase of the subdivision. The plans have been updated to reflect the requirements of the current engineering standards including sidewalk being one-foot from the property line.

- b. Using minimum K-factors for crest and sag vertical curves of 12 and 26 respectively.

Response: The plans have been updated to meet the K-factor requirements of the current engineering standards.

- c. The 100-foot radius horizontal curve at the construction of Hauser Blvd at Overlook Estates.

Response: This location is where two existing streets come together where no curve currently exists but the street comes in at an angle. Within Overlook Estates the street meets City requirements with curb and gutter, pavement, boulevard, and sidewalk. South of this location the road is gravel. Per the exhibit provided with the application, if a 150-ft radius



curve is added and with the required boulevard it pushes the sidewalk into the adjacent property on the east side of the street. There is no ability for the applicant to obtain additional right-of-way for the placement of this sidewalk therefore one of two things needs to occur, either the City allows for a reduced curve radius of 100-ft or a reduced boulevard on the east side in this location to keep the sidewalk out of the adjacent property. This does not affect the design of the subdivision and therefore, we request that a requirement for a deviation for one or the other option be deferred until we submit engineering plans for Phase 1 of the subdivision prior to construction and final plat for Phase 1.

- d. The 60-degree intersection angle at Floweree Court and Park Drive.
Response: The plat and engineering plans have been updated to show Floweree Court coming off Park Drive at a 75-degree angle as required current engineering standards.
- e. The intersection tangent length at Brakeman Avenue and Park Drive.
Response: The engineering plans showed an intersection tangent length of over 100-ft for Brakeman Avenue off of Park Drive. The PER indicated that this was less than 100-ft which was a left over from the previous submittal of the application and was corrected for this submittal. The PER has been updated to remove this.

10. 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.

Response: New traffic data was collected in October of 2021 and September of 2022 to update current volume information on all roads within the study area. The traffic counts for 2020, 2021, and 2022 are all included in the report.

- 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.

Response: New traffic data was collected in October of 2021 and September of 2022 to update current volume information on all roads within the study area. New traffic counts are included in the report.



- 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-weekday during the school year.

Response: New traffic data was collected in October of 2021 and September of 2022 to update current volume information on all roads within the study area. Traffic counts were conducted during mid-week non-holiday and no seasonal adjustment factor was applied to the data.

- 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.

Response: The TIS has been updated throughout to reference the Phase 4 and full buildout year of 2029.

- 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.

Response: The report has been updated to use the LRTP growth rate of 1.3% on Euclid Avenue and 5.1% on Hauser Boulevard east of Granite Avenue.

- 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.

Response: The TIS was updated using the ITE Trip Generation Manual 11th Edition.

- g. Page 8. Trip Generation. Trip generation forecast table (Table 2) should identify ingress and egress trips for each phase and each study period.

Response: The trip generation table, new Table 3, has been updated to include ingress and egress trips for each phase at the AM and PM peak hours.

- 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.

Response: The report has been updated to reflect 100% of traffic at 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.

Response: A description of the methodology for the trip distribution is provided in the updated TIS.

- 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).

Response: The TIS has been updated to indicate the use of the most current editions of the manual and software.

- 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.

Response: Two additional tables have been added to show intersection LOS at the design year of 2029 without the subdivision traffic.

- 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.

Response: There are no recommended improvements for the intersection of Granite Avenue and Euclid Avenue (Highway 12) at this time. The signal warrant analysis indicates that a signal is not warranted based on anticipated traffic from the development. Additionally, the LRTP indicates the LOS for the intersection as E/F in 2035 with no recommendations for improvements. The report has been updated in multiple areas to discuss this as well as within the Appendix E - Signal Warrant Analysis.

- 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.

Response: New traffic data was collected in October of 2021 and September of 2022 to update current volume information on all roads within the study area. With the new traffic data, no COVID factor or any other factor were applied to the data.



- 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.

Response: The new traffic data collected in 2021 and 2022 has eliminated this issue. The report has been updated with the new traffic count data.

- 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.

Response: Trip counts have been reviewed and corrected.

- 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.

Response: This has been corrected in the report.

- 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.

Response: The signal warrant analysis has been updated accordingly and a sensitivity analysis included in the 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.

Response: This has been included in the updated signal warrant analysis.

- 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.

Response: The study area selected for the project includes all major intersections which will be significantly impacted by the development. The majority of traffic from the project (80%) will use Granite Avenue to reach Euclid Avenue and will continue east into Helena. Traffic impacts on Hauser Avenue east of Granite Avenue will be low at less than 30 vehicle per hour during the AM and PM peak hours. This level of traffic will not have significant impacts on roadway or intersection operations to the east. This information has been added to the report.



- 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
Response: A sight distance analysis was not conducted at this time as the current engineering standards do not require this level of analysis. All intersections are located on the outside of any curves or intersections and at this time there does not appear to be any sight distance concerns for the new intersections. A more thorough review of intersection sight distances can be completed during engineering review of each intersection prior to construction of each phase of the subdivision.
 - ii. Parking analysis, including documentation of proposed on- and off-street parking supply relative to City of Helena Requirements.
Response: A parking analysis was not conducted at this time as the current engineering and/or subdivision regulations do not require this analysis during preliminary plat review. All internal roads will be designed to City of Helena Engineering Standards to provide on street parking throughout the subdivision. All lot development after final plat of each phase will be in compliance with zoning requirements which require the provision of off-street parking depending on development of the lot. Off-street parking will be reviewed as part of the building/zoning review process at the time of lot development.
 - 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.
Response: Crash numbers have been added to the report.
 - iv. Queuing analysis at Granite Ave & Euclid Ave.
Response: A queuing analysis has been added to the report.

Parks and Recreation

11. 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.
12. 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.

Response: The applicant did a survey of the property and found that weeds are present on the property. The applicant is currently doing weed treatment throughout the property on an annual basis. A weed management plan with the County Weed District will be required prior to construction of each phase. This will



include an inspection of the property for weeds and a schedule and requirements for treatment.

13. 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.

Response: The current application indicates the applicant is proposing to dedicate Lot 12 of Block 7 to the City of Helena to satisfy the parkland dedication requirements. If the parks board proposes a combination of dedication and cash-in-leu, the applicant will be required to provide an appraisal prior to final plat that provides the undeveloped land value to determine the cash-in-leu payment. An appraisal is typically not provided at this stage of project review.

14. 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.

Response: This is a new application for the subdivision. The applicant is proposing to dedicate Lot 12 of Block 7 to the City of Helena to satisfy the parkland dedication requirements. The parks board will need to reevaluate this proposal at a new meeting required for this application.

Additional Information:

The PER was also updated for the downstream wastewater system capacity analysis due to the removal of the proposed lift station for the City of Helena Westside sewer project and the installation of a gravity sewer main across the Kessler School property. With the removal of the lift station, the new analysis shows that the downstream sewer has capacity for the proposed subdivision without the need for upgrades.

It is our sincere hope that these comments have been adequately addressed and that the **West Side Woods Phased Major Subdivision** be approved as soon as possible. Please do not hesitate to contact us should you have any further questions or require additional clarification.

Sincerely,



Jeremy Fadness, P.E., AICP
Project Manager

JF/mh

Encl.: As Noted

cc: Derek Davis, Sussex Developer (derek@sussexconstruction)
File

