

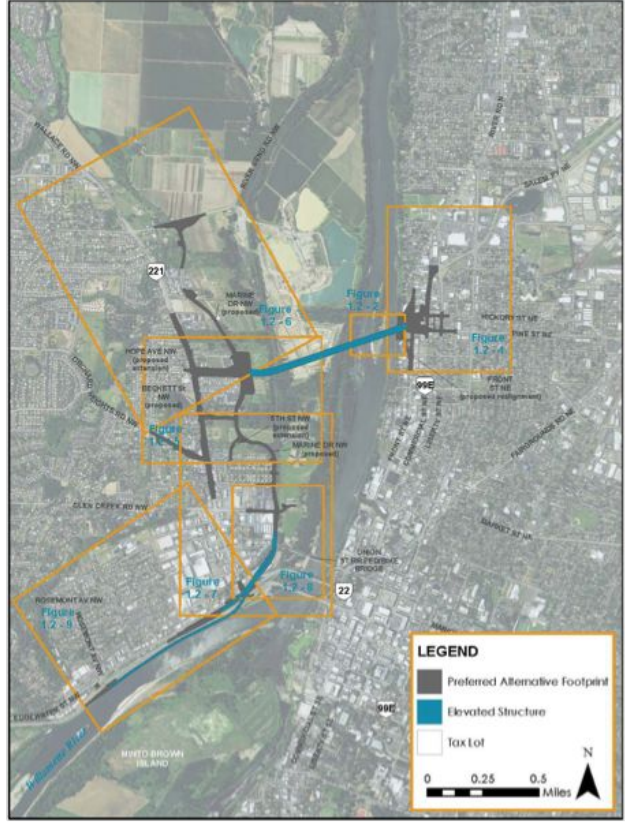
# PREFERRED ALTERNATIVE FOOTPRINT

Testimony of Darrell Haugeberg, WSNA Land Use Committee, 1474 Ammon ST NW, Salem, OR 97304

[dfhaugeberg@gmail.com](mailto:dfhaugeberg@gmail.com) October 10, 2016

Re: CA 2016-04

Figure 1.2-1: Overview of Preferred Alternative



WHAT IS GAINED?

**3rd BRIDGE**

**+**

**4th LONG ELEVATED STRUCTURE BRIDGE**

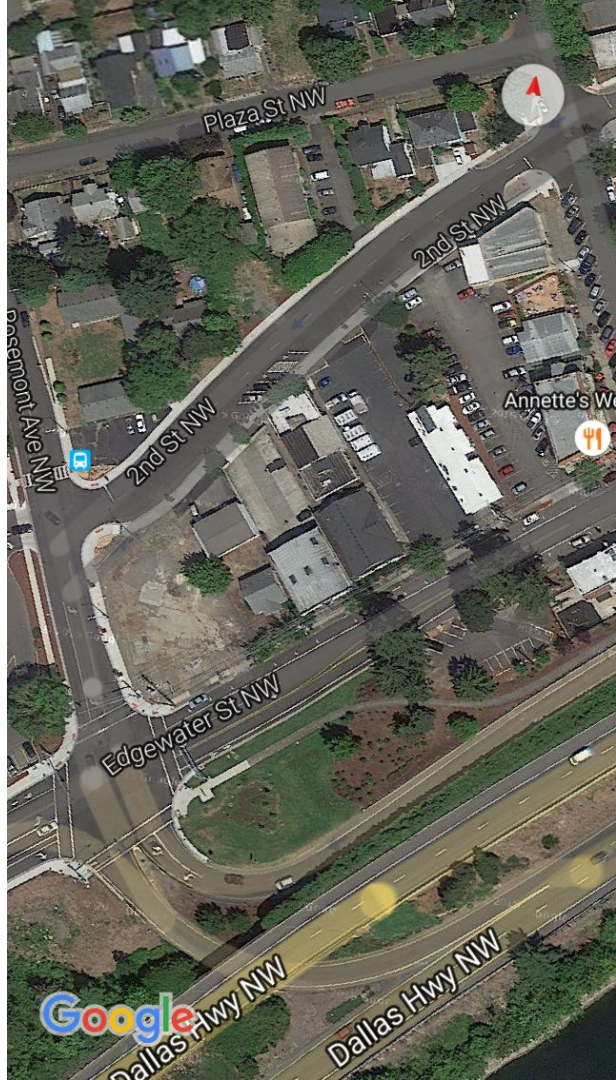
**+**

**STREET CONNECTIONS**

# WHAT IS LOST?

The High Traffic Volume ON/OFF Interchange at Rosemont Ave NW would be closed.





# WHAT IS LOST?

**31 Houses**

**16 Apartments**

**61 Businesses**

**203 OTHER TAX LOTS**

PREFERRED ALTERNATIVE			DISPLACEMENT COUNT		
Taxlot	Address	Impact Type	Residential: House	Residential: Apt Units	Business(es)
073W22C000707	1124 WALLACE RD NW	Property Only (no displacement)			
073W22C000709	<i>no street address</i>	Property Only (no displacement)			
073W22C001500	280 WALLACE RD NW	Property Only (no displacement)			2
073W22C001600	110 WALLACE RD NW	Property Only (no displacement)			4
073W22C001800	<i>no street address</i>	Property Only (no displacement)			
073W22C800100	300 GLEN CREEK RD NW	Property Only (no displacement)			
073W22C800102	350 GLEN CREEK RD NW	Property Only (no displacement)			
073W22C801206	400 GLEN CREEK RD NW	Property Only (no displacement)			
073W22C802504	540 WALLACE RD NW	Property Only (no displacement)			
073W22C802700	<i>no street address</i>	Property Only (no displacement)			
073W22C802702	<i>no street address</i>	Property Only (no displacement)			
073W22C802800	<i>no street address</i>	Property Only (no displacement)			
<b>Totals</b>			31	16	61



THE PREFERRED  
ALTERNATIVE  
LOSS  
IS A LOT HIGHER  
THAN THE GAIN!

**STOP**

**THE PREFERRED  
ALTERNATIVE!**

Testimony of Darrell Haugeberg, WSNA Land Use Committee, 1474 Ammon ST NW, Salem, OR 97304

[dfhaugeberg@gmail.com](mailto:dfhaugeberg@gmail.com) October 10, 2016

Re: CA 2016-04

**Bryan Colbourne - Salem River Crossing Proposal Case File: CA 16-04**

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**From:** "Gary Obery" <garyobery1@gmail.com>  
**To:** "Julie Warncke" <JWarncke@cityofsalem.net>  
**Date:** 10/12/2016 7:17 AM  
**Subject:** Salem River Crossing Proposal Case File: CA 16-04

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Julie, here is the written testimony I am submitting for the public hearing tonight. Gary

October 12, 2016

City of Salem Mayor and City Council  
Marion County Commission  
Polk County Commission  
City of Keizer Mayor and City Council

RE: Salem River Crossing Proposal Case File: CA 16-04

Honorable assembled officials:

As a citizen and practicing professional civil engineer in Salem, I oppose current plans for the Salem River Crossing and the associated expansion of the Urban Growth Boundary and modifications to Salem's Transportation System Plan. My concerns include:

- Evaluation of the feasible improvements to the existing bridges (Alternative 2A) is inadequate. Specifically, a free flow ramp from the Center St Bridge to NB Front street should be evaluated. I have worked in the civil and traffic engineering field for over 20 years and I see no geometric or operational reason for such a ramp to not function acceptably well into the future. The 1998 Bridgehead study included this improvement among it's list of recommendations at a cost of about \$4.4M. That project included two lanes from NB Front St and the free flow lane from the ramp. It seems feasible to reduce NB Front St to one lane and still carry all the anticipated traffic. This would allow more space for the Center St ramp traffic and may lessen the extent of the improvements needed for the Marion St Bridge.
- The large roadways planned with the Salem River Crossing bridge will be a tremendous detriment to the affected neighborhoods in east and west Salem even before the project is ever built , and as such, the project should not be included in the Salem Transportation System Plan until there is a reasonable chance it can be funded. To date, the public has not shown any interest in tolls or higher property taxes. As a majority of the traffic on the bridge is inter-city commuter traffic, the project is likely to be judged as a city or county issue that will need to be funded through local or regional funds, not statewide funds. With little chance of securing funding for the bridge and connecting roadways, the project does not belong in the city's Transportation System Plan which is supposed to be "fiscally constrained".

Sincerely,

Gary R. Obery, P.E.

**Bryan Colbourne - No Third Bridge**

---

**From:** GARY LINDA WALLMARK <gwallmark@msn.com>  
**To:** "Citycouncil@cityofsalem.net" <Citycouncil@cityofsalem.net>, "JWarncke@c...  
**Date:** 10/12/2016 7:29 AM  
**Subject:** No Third Bridge

---

I am sending you this email because I don't think I will be able to attend the public hearing tonight regarding the proposed third bridge but wanted you to be aware that I strongly oppose the proposal.

A third bridge is not an effective, cost effective way to handle the downtown congestion that occurs at only limited hours of the day. Most West Salem commuters are going to or from the core downtown/state agency portion of east Salem. Even if a new bridge is constructed, they will still need to commute on this same route using the existing bridges since this is the most direct route. Thus, impact on traffic flow at the only time of day in which Salem truly has a traffic problem will not be significantly affected. Much less money can be spent to improve traffic flow with improvements to the existing bridges and ramps and enhancements to public transportation.

But transportation is not the only expensive capital improvement facing the city. We are considering an expensive new Salem Police facility (which seems likely to be approved in some configuration). Our City Hall and Library need seismic upgrade. And speaking of seismic upgrades, the proposed third bridge money would be better spent on seismic upgrades for the existing bridges — we need to make certain that this crucial transit artery is not compromised by the predicted Cascadia subduction earthquake. We have other vital long range projects that would be starved by the half billion dollar expense of a new bridge.

Finally, I am concerned about the adverse environmental impact of the proposal. These negative impacts are multiple, but I am particularly concerned about one — atmospheric carbon footprint. Proponents argue that the third bridge would decrease emissions because cars would not sit idle in traffic, but it has been demonstrated through study that a third bridge would actually increase, not decrease, long term carbon emissions. I owe it to my grandkids and future generations to oppose any public policy that has this effect. If you want to decrease traffic idling and thus decrease atmospheric carbon pollution, improve the existing bridges to improve traffic flow in the corridor that would be most used by West Salem residents.

Gary Wallmark  
4734 Bradford Lp SE  
Salem, OR 97302  
503.364.7413

**Bryan Colbourne - Fwd: Testimony for Land Use Actions CA16-4**

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**From:** Amber Mathiesen  
**To:** Bryan Colbourne  
**Date:** 10/12/2016 8:11 AM  
**Subject:** Fwd: Testimony for Land Use Actions CA16-4

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Amber Mathiesen  
City Recorder  
City of Salem  
503-588-6097

>>> Jim Scheppke <jscheppke@comcast.net> 10/11/2016 4:54 PM >>>

Dear Salem City Council:

I want to document and amplify the verbal testimony that I gave to the City Council at your meeting on October 10, 2016.

My group, NO 3rd Bridge, objects to the passage of Ordinance Bill 14-16 making major comprehensive plan amendments pertaining to the Salem River Crossing Preferred Alternative. We believe that the City of Salem's process in this regard does not conform to Statewide Planning Goal 1: Citizen Involvement, as implemented in OAR 660-015-0000(1).

Goal 1 requires that the City "develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process." This has not been done. The last significant citizen involvement came from the Salem River Crossing Task Force which met from October 4, 2006 to August 15, 2012. At their final meeting, the Task Force, on a questionable plurality vote involving mostly interested staff members of various state and local governments, forwarded Alternative 4D to the Oversight Team. This alternative was eventually rejected by the City of Salem in June of 2014 and a new alternative was developed called the "Salem Alternative." This in turn was substantially modified by the Oversight Team to become the Preferred Alternative which is the subject of the current land use actions. So there has been no significant "citizen involvement" for over four years and the recommendation of the Salem River Crossing Task Force had been rendered moot by subsequent developments.

Goal 1 requires that "the citizen involvement program shall be appropriate to the scale of the planning effort ... [and] provide for continuity of citizen participation and of information that enables citizens to identify and comprehend the issues." As the largest public works project ever contemplated in the City of Salem, the Salem River Crossing project demands the highest degree of public involvement. This has not occurred. There has been no "continuity of citizen participation" since August of 2012. No efforts have been made for "citizens to identify and comprehend the issues" for four years. Most recently the City has posted 63 reports and documents since October 5, 2016, on an obscure and hard to understand web page. They total approximately 3,500 pages of information. No attempt has been made to summarize them for the public or make them easy to use or understand.

The Salem River Crossing is not even highlighted on the City's home page:

The screenshot shows the City of Salem website. The top navigation bar includes links for Home, City A-Z, Contact Us, Calendars, and Emergencies. Below this is a secondary navigation bar with links for How do I..., City Council, Departments, Residents, Business, Visitors, and E-Payments. The main content area features a large banner for 'Education' with a photo of two graduates. To the left is a sidebar with links for About Salem, Awards, Community Connection, Press Releases, Salem News, Your City, Mayor, City Manager, City Structure, City Government, City Charter, Revised Codes, Budget, Citizen Review Agency, Salem Housing Authority, SecretPlace Online, Mid-Waterway Investments Initiative, and Salem Calendars. To the right is a 'What's New' section with several news items. At the bottom right, there is a 'City Highlights' section with three items.

There is just one small link in the lower right of the page.

Goal 1 requires that "the committee for citizen involvement shall be responsible for assisting the governing body with the development of a program that promotes and enhances citizen involvement in land-use planning, assisting in the implementation of the citizen involvement program, and evaluating the process being used for citizen involvement." Since the Salem River Crossing Task Force has not met in four years it is obvious that this requirement of Goal 1 is being ignored.

Goal 1 requires that "citizens shall have the opportunity to be involved in the phases of the planning process as set forth and defined in the goals and guidelines for Land Use Planning, including Preparation of Plans and Implementation Measures, Plan Content, Adoption, Minor Changes and Major Revisions in the Plan and Implementation Measures." Again, because the Salem River Crossing Task Force has been inactive for four years, none of this has occurred or is occurring.

Goal 1 requires that "information necessary to reach policy decisions shall be available in a simplified, understandable form. Assistance shall be provided to interpret and effectively use technical information. A copy of all technical information shall be available at a local public library or other location open to the public." None of this has been done.

Goal 1 requires that "citizens who have participated in this [citizen involvement] program shall receive a response from policy-makers. The rationale used to reach land-up policy decisions shall be available in the form of a written record." We believe this has not been done and the requirement is being ignored.

Finally Goal 1 requires that "adequate human, financial, and informational resources shall be allocated for the citizen involvement program." Since the Salem River Crossing Task Force held their last meeting on August 12, 2012, this has not been the case. There has been little or no resources allocated for the citizen involvement program.

In sum the City of Salem and the other partners in the Salem River Crossing Project are ignoring Oregon land use law and not following the requirements of Goal 1: Citizen Involvement (OAR 669-015-0000(1)). Before a

second reading is scheduled for Ordinance Bill 14-16 the City of Salem must remedy their failure to follow the law by conducting a citizen involvement program for the Salem River Crossing Preferred Alternative in accordance with OAR 660-015-000(1).

Jim Scheppke  
1804 E. Nob Hill  
Salem, OR 97302





# GRANT NEIGHBORHOOD ASSOCIATION

SALEM

OREGON

October 11, 2016

Salem City Council  
555 Liberty St SE, Room 240  
Salem, OR 97301

Dear Mayor and Members of Salem City Council,


Re: **Urban Growth Boundary  
PROPOSED EXPANSION**

Dear Mayor and Members of Salem City Council,

The Grant Neighborhood Association has discussed the Urban Growth Boundary expansion proposal and unanimously voted against the proposal. Our primary reason for not supporting the proposed expansions are that we still have large amounts of undeveloped land within the urban growth boundary and we do not support the 3<sup>rd</sup> bridge. We urge that Salem City Council to not approve the urban growth boundary expansion.

Oregon is one of the few states that require cities to have an urban growth boundary and to maintain enough undeveloped land that will sustain development for the next 20 years. However, the City of Salem has plenty of land available for development and is only looking to expand a significant portion in West Salem to support the 3<sup>rd</sup> bridge and all necessary infrastructure.

Grant Neighborhood Association opposes the 3<sup>rd</sup> bridge due to the negative impacts to our neighborhoods and vibrant downtown. The path of the 3<sup>rd</sup> bridge will directly impact Highland Neighborhood by removing housing and business, add a high speed highway connecting the Salem Parkway to the new bridge, and will create a large elevated concrete structure within a vibrant neighborhood. Footings and infrastructure within West Salem will be placed within wetlands, reduce the beauty and square footage of Wallace Marine Park, and displace many Salem residences to construct the new bridgeheads and connecting streets. Lastly, directing through traffic out of our



downtown is a terrible idea. This removes potential customers from a vibrant and growing downtown, many of which stop for coffee, a bite to eat, or general shopping on their way to the coast.

Please accept this letter on behalf of the Grant Neighborhood Association in opposition to the Urban Growth Boundary Expansion.

Sincerely,

/s/

Eric Bradfield, co-chair

/s/

Sam Skillern, co-chair



RECEIVED

OCT 12 2016

CITY OF SALEM  
PUBLIC WORKS

October 12, 2016

City of Salem Mayor and City Council  
Marion County Commission  
Polk County Commission  
City of Keizer Mayor and City Council

RE: Salem River Crossing Proposal Case File: CA 16-04

Honorable assembled officials:

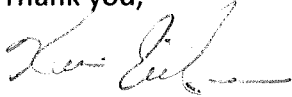
I represent my family (Kevin and Lisa Erickson) who live at 1849 Kenard Street NW and would like to submit our testimony in writing to you that we are not in favor of the current proposal to expand the Urban Growth Boundary (UGB) as described in the "Notice of Public Hearing" dated September 22, 2016.

Based on the Findings Report 10-4-16 (Exhibit 1 to the Ordinance), we are not in agreement with the exclusion of Goal 3 based on the statement "The majority of the footprint for the Preferred Alternative is located within the existing Salem-Keizer UGB" (pg 231). If this is the case, why would you need to expand the UGB? Based on Figure 30 in the document, a substantial portion of the bridge is outside of the UGB. In addition, Goal 3 states "Zoning applied to agricultural land shall limit uses which can have significant adverse effects on agricultural and forest land, farm and forest uses or accepted farming or forest practices. Since Marine Drive will be at grade and the bridge will connect to Marine Drive the indicated minimal impact to the farm land is in question. The document does not state how low the bridge will be as it approaches Marine Drive, the document just states only the piers will be in the agricultural area. Also, it does not describe how much of Marine Drive will consume the agricultural land. Finally, the document does not discuss the construction period or the effects of construction on the agricultural land, which could and probably will have a significant adverse effect on the agricultural land.

Second area of disagreement with the Findings Report 10-4-16 (Exhibit 1 to the Ordinance). According to "Findings – 660-012-0035(10)-(12)" on page 158, states "These criteria are not applicable. While a UGB amendment is proposed as part of the consolidated plan amendments package (see Section 1.3), the UGB amendment will connect two urbanized areas of Salem and is not building new transportation capacity at the fringe of the region. Rather, the Preferred Alternative will improve transportation connectivity within the existing UGB to serve existing and planned land uses and forecast 20-year growth."; however, the land requested to be brought into the UGB is at the fringe. Based on Webster's Third International Dictionary definition of fringe(2), "something resembling a fringe: BORDER, EDGING, MARGIN, PERIPHERY", this is exactly the area under question and the bridge will add additional transportation capacity; therefore, we disagree with the findings.

Finally, we would like to submit as part of our argument the testimonies of Linda Bierly, WSNA Park Chair, dated October 12, 2016 (Attachment 1), Troy William, Riverkeeper & Executive Director Willamette Riverkeeper, dated October 1, 2016 (Attachment 2), Kenneth Bierly, Chair Glenn and Gibson Creek Watershed Council, dated October 7, 2016 (Attachment 3), and Tremain Arkly, President of Friends of Polk County (Attachment 4). We are in agreement with their positions as contained within each of their specific testimonies.

Thank you,

A handwritten signature in cursive script, appearing to read "Kevin Erickson", written in black ink.

Kevin Erickson  
1849 Kenard Street NW  
Salem, OR 97304

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair  
2308 Ptarmigan St. NW, Salem, OR 97304 [bierlyskl@gmail.com](mailto:bierlyskl@gmail.com)  
October 12, 2016

Salem City Council  
Keizer City Council  
Polk County Commission  
Marion County Commission

***Amend the Salem-Keizer UGB to add approx. 35 acres (Parks & Open Space designation) to accommodate the transportation need identified in the Salem River Crossing Preferred Alternative to construct a new bridge across the Willamette River. Amend the Salem and Polk County Transportation System Plans to incorporate Preferred Alternative. Amend Salem Greenway Plan to take an exception to Goal 15.***

The West Salem Neighborhood Association will have our annual meeting October 17, 2016. The WSNA Land Use Committee is in the process of goal setting for the coming year. Review of these proposed actions has become part of this process. As a member of the WSNA Land Use committee and WSNA Parks Chair, I would like to offer the following comments:

**Top Down Process:** This process has been rushed and driven from the top down. WSNA is a town hall organization. We pride ourselves on community and grass roots participation in all decisions and we regret and protest the lack of public involvement in this process. Since 2014, the only opportunity for input has been to testify in public hearings where no questions are permitted. Rather than simply react to staff reports, we need time to process these new elements of the transportation plan, the proposed amendment to the UGB and the proposal to take a goal 15 Exception, in the context of the West Salem Neighborhood Plan, the Edgewater Plan and the Wallace Road Local Access and Circulation study. These are not small decisions. Until this process has slowed to allow for greater public involvement and we have more information about the consequences both short term and long term, we cannot make informed decisions regarding the staff recommendations.

Salem Parks and Recreational Advisory Board has not been informed or advised of the impacts to city or regional parks and the Willamette River Greenway.

**Cost/Benefit Analysis needed:** Staff and decision makers have not seriously looked at the long term economic impacts of this action. In the end, will the costs of this project outweigh the benefits? This information needs to be determined prior to even beginning to go down this road.

For example, what is the fiscal impact of

- The loss of 55-65 businesses, their economic benefit to the community and the property tax revenue they provide?
- The loss of 55-65 homes and the property tax revenue they provide?

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair  
2308 Ptarmigan St. NW, Salem, OR 97304 [bierlyskl@gmail.com](mailto:bierlyskl@gmail.com)  
October 12, 2016

**The Preferred Alternative is inconsistent with some goals and policies of the West Salem Neighborhood Plan, The Edgewater Study, and the Wallace Road Local Access and Circulation Study**

**GOAL 1**

To achieve a pattern of land use and development that:

- a) maximizes the use of land within the current UGB; b) provides a mixture of housing types for all income levels; c) promotes the long-term economic health and self-sufficiency of West Salem; d) is supportive of neighborhood businesses; e) accommodates a wide range of ages and lifestyles; f) is pedestrian and transit friendly; and g) is sensitive to existing urban form in historically sensitive areas.

(note: the above order is based on the order of the Salem Area Comprehensive Plan Salem Urban Area Goals and Policies, not priority of importance.) Neighborhood Plan, the Edgewater Plan, and the Wallace Road Local Access and circulation Study 1

**Maximize Use of Land**

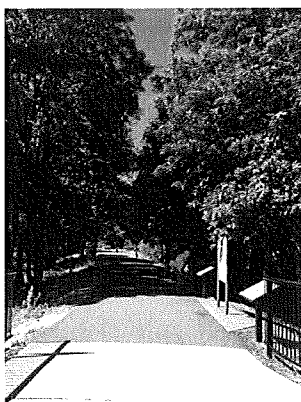
Policy 1.1 Encourage higher densities, infill, and mixed-use opportunities, where appropriate, to minimize the need for UGB expansion. 1

- **The preferred alternative and STSP amendments continue the pattern of green field development located away from existing services that has led to over- reliance on the automobile and resulting congestion.**

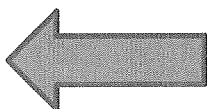
**Historic Areas**

Policy 1.18 Identified historic structures with National Register designation or the City’s Local Resource designation shall be protected for future generations. If proposed uses conflict with the preservation of the original character of these structures, these structures shall be protected by acquisition or through the limiting of the intensity of development to promote conservation. 1

**Preferred Alternative Marine Drive / Hwy 22 ramp is proposed to pass directly overhead the historic Union Street Trestle and Pedestrian / bicycle path.**



This view would be replaced by the Marine Drive ramp to Highway 22. The trees would be gone.



Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair  
2308 Ptarmigan St. NW, Salem, OR 97304 [bierlyskl@gmail.com](mailto:bierlyskl@gmail.com)  
October 12, 2016

**Preferred alternative creates a physical and visual barrier between the community of West Salem and the Willamette River**

*Willamette River*

*Policy 7.3 Regard the Willamette River as a significant natural resource and public amenity. New development shall give priority to river and floodplain functions, provide public access to the banks of the river, and encourage restoration and other compatible uses of the banks.<sup>1</sup>*

- **The extensive ramp system, the existing Highway 22 berm and the proposed Marine Drive exit off of the new bridge all will act as barriers between West Salem and the Willamette River. One of the goals of both the West Salem Neighborhood Plan and the Edgewater Study was to provide better views and better pedestrian access to the Willamette River. Instead, the Preferred Alternative removes any possibility of improved access.**



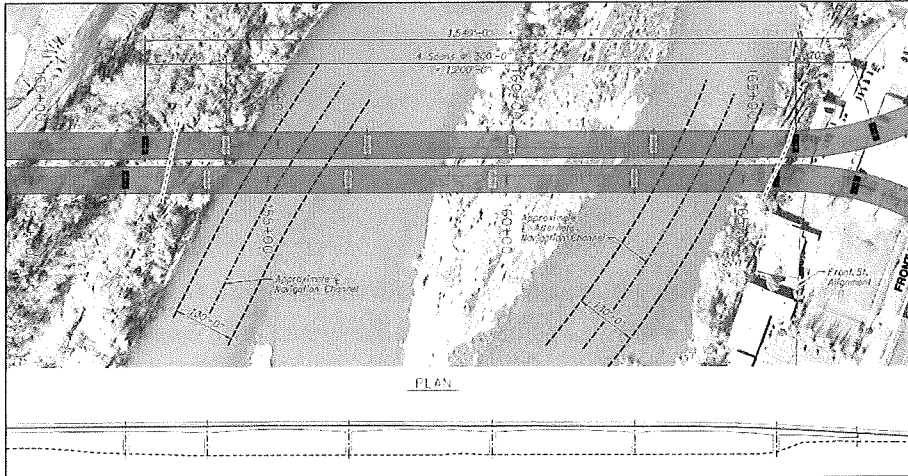
- **Extensive Ramp system isolates West Salem from the Willamette River**



Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair  
2308 Ptarmigan St. NW, Salem, OR 97304 [bierlyskl@gmail.com](mailto:bierlyskl@gmail.com)  
October 12, 2016

**Park Impacts:**

**McLane Island Landing State Park**



Two sets of bridge piers will be placed within **McLane Island Landing State Park**, directly impacting the park and recreational users of this park.

The new bridge also crosses northern **Wallace Marine Park**, directly impacting this park.

Marine Drive, now proposed as a minor arterial south of Hope Avenue, will create a physical barrier and safety hazard on the west side of **Wallace Marine Park**. The Marine Drive ramps that provide the connection to Highway 22 eliminate the possibility of Edgewater River Walk envisioned in the Edgewater Plan.

Marine Drive / Highway 22 ramps fly over the pedestrian path to the historic **Union Street Railroad Bridge** creating noise and visual pollution as well as negative health impacts from the automobile exhaust that will be directly overhead park users.

**Edgewater Trail** would be lost under the Highway 22 ramps.

**Loss of Trees**

*Urban Forest*

*Policy 7.4 Preserve and where possible enhance West Salem's urban forest (tree canopy) 1*

Placement of these roadways and ramps will necessitate removal of the gallery forest along the ROW - the trees that enhance the livability and the water and air quality of West Salem.

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair

2308 Ptarmigan St. NW, Salem, OR 97304 [bierlyskl@gmail.com](mailto:bierlyskl@gmail.com)

October 12, 2016

**Preferred Alternative leaves the community of West Salem to bear the impacts of regional traffic while doing nothing to relieve local traffic congestion**

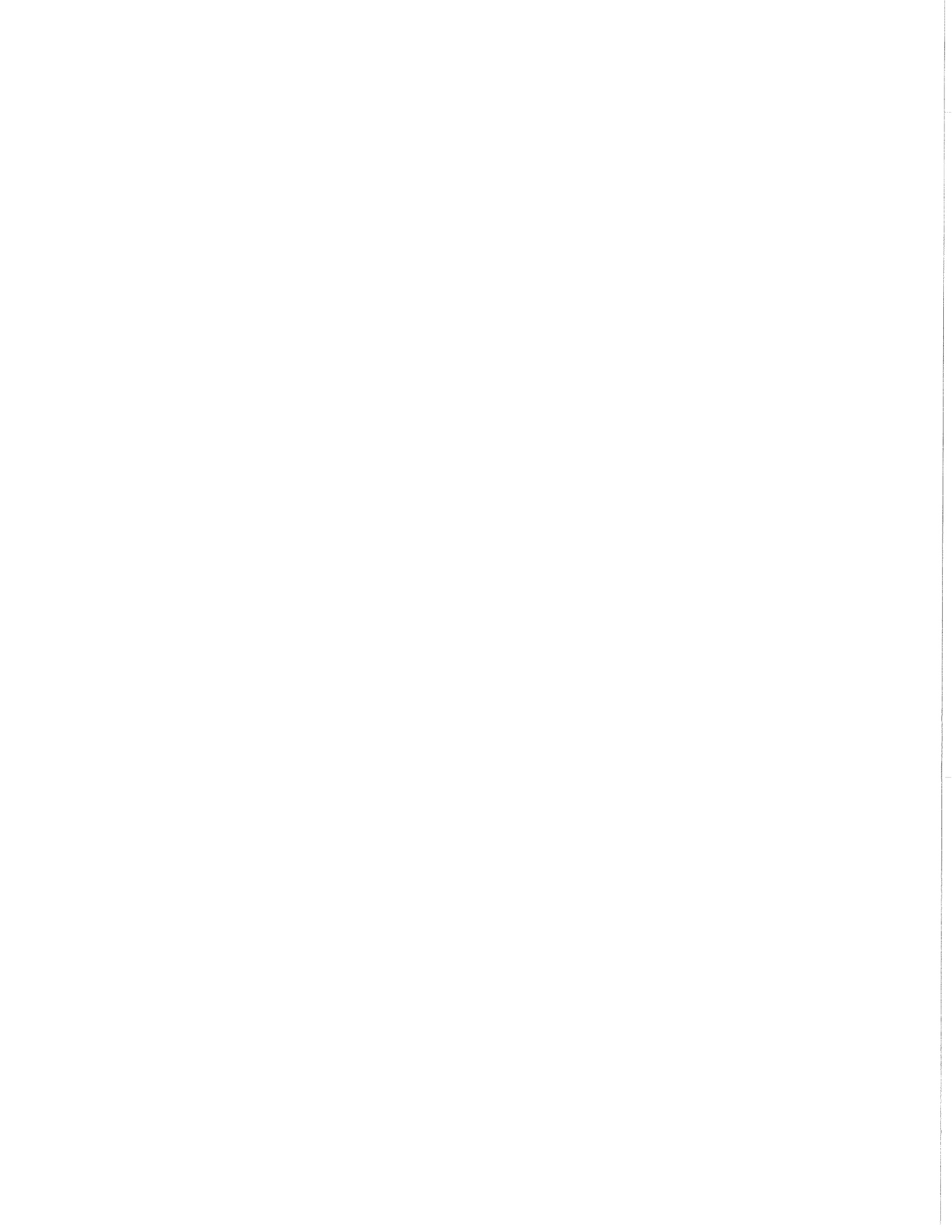
The new bridge dumps traffic directly back onto Wallace Road at Hope Avenue. The Marine Drive ramps that connect to Highway 22 remain at the same location as the existing bridges. The result is a physical wall around the east and south sides of West Salem complete with the noise, pollution and congestion of both the regional and the local traffic. The preferred alternative does nothing to improve the congestion for West Salem drivers and it forces regional traffic back onto the same congested loop used by the westbound local traffic from downtown Salem.

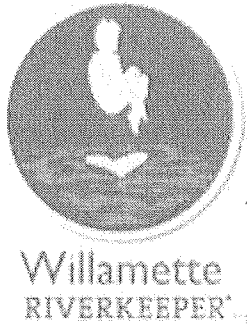


**The Union Street Railroad Bridge provides an existing emergency alternative to the Marion and Center Street bridges**

Please vote against this proposal. This proposal has not had adequate public outreach and involvement. The amendments to the STSP have not been heard and considered by the WSNA. The impacts to West Salem businesses, homeowners, and community livability are too great and the returns are too small to justify the huge initial expense of this project. No one knows where the money is to come from either for the building costs or for the maintenance.

Please vote NO.





October 1, 2016

City of Salem Mayor and City Council  
Marion County Commission  
Polk County Commission  
City of Keizer Mayor and City Council

RE: Salem River Crossing Proposal Case File: CA 16-04

Honorable assembled officials:

I represent a basin-wide organization called Willamette Riverkeeper. Our organization works to protect and restore the Willamette River's water quality and habitat. We have several hundred members throughout the Willamette Valley, with many in Salem, Keizer and the surrounding area. We have some significant issues with the proposed bridge and amendments to local zoning around Goal 15.

We have the following concerns.

**Impacts to State Parks and Willamette River Recreation**

The Draft EIS and all public involvement have overlooked the fact that McLane Island is an Oregon State Parks Department property. It is part of the Willamette Water Trail (see <http://willamettewatertrail.org/map/mclane-island/>), a federal designation made by the Secretary of the Interior. The draft EIS has no recognition of either the ownership of the island by the Oregon Parks and Recreation Department or evaluation of the impacts of the proposed bridge on the use of the island as a part of the Willamette Water Trail.

Willamette Riverkeeper is the key partner with the Oregon State Parks and Recreation Department in regard to the Water Trail, and no OPRD staff or our staff have heard of this proposed change until recently. In fact, it seems OPRD has not been notified of this significant proposal by the City of Salem.

Having a bridge over this island is very problematic for public use, and for wildlife. Further, bridge piers placed in the side channel around the island would also pose unnecessary risk to

river users. In our view, it seems some critical communication has not occurred with the State of Oregon, or with local river organizations.

**The Salem Willamette Greenway Program**

Salem is the Capitol City of Oregon and the second largest city in the state, yet the City has paid little attention to the Willamette Greenway. It is somewhat ironic given that Governor Bob Straub, who first formally proposed the Willamette Greenway Program, had strong ties to Salem in multiple ways. The Greenway Program was adopted in 1979 and has not been updated or reviewed in the many years since it was adopted, and this represents a significant lack of connection by the City of Salem to this important Land Use Goal.

There has been little effort on the part of the City to seek the public sentiment about the Willamette waterfront other than the development of Riverfront Park and acquisition of the Boise Cascade property to add to Minto-Brown Island Park. The proposed action by the City will greatly impact the Willamette Greenway in the City limits, and has not been evaluated enough in regard to the decision before the Commission.

I urge you to postpone a decision until further analysis has been done that adequately reflects the requirements of the Willamette Greenway, the Oregon State Parks and Recreation Departments property at McLean Island, and further engages the public in a meaningful way.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Wilton". The signature is written in a cursive, flowing style.

Riverkeeper & Executive Director  
Willamette Riverkeeper



## **Glenn - Gibson Watershed Council**

October 7, 2016

City of Salem Mayor and City Council  
Marion County Commission  
Polk County Commission  
City of Keizer Mayor and City Council

RE: Salem River Crossing Proposal Case File: CA 16-04

Honorable assembled officials:

I represent the Glenn and Gibson Creek Watershed Council and would like to make comments on the proposal before you. The need for and location of additional river crossings of the Willamette River in the Salem-Keizer area has been the subject of much debate and deliberation over decades. Others with a better understanding of population projections and traffic projections will provide comment about the information used and the meaning of that information. I will focus on the issues of interest to the watershed council. The Glenn and Gibson Creeks watershed lies on the west side of the Willamette River in Salem with headwaters in Polk County outside the City limits.

We have six primary concerns about the proposal before you: 1) impacts to the recreational use of the Willamette River, 2) impacts to the floodplain and the failure to consider the recent changes to the federal flood management program, 3) encroachment on tributaries to the Willamette River by Marine Drive, 4) the general lack of attention to the Willamette Greenway in Salem, 5) impacts to agricultural lands, and 6) expressions of community concerns. In addition to the concerns raised in this letter I have attached separately a list of what I see as flaws in the materials presented by the staff that is relevant to your decision (Attachment A).

### **Concern #1: Impacts to State Parks property and Willamette River Recreation**

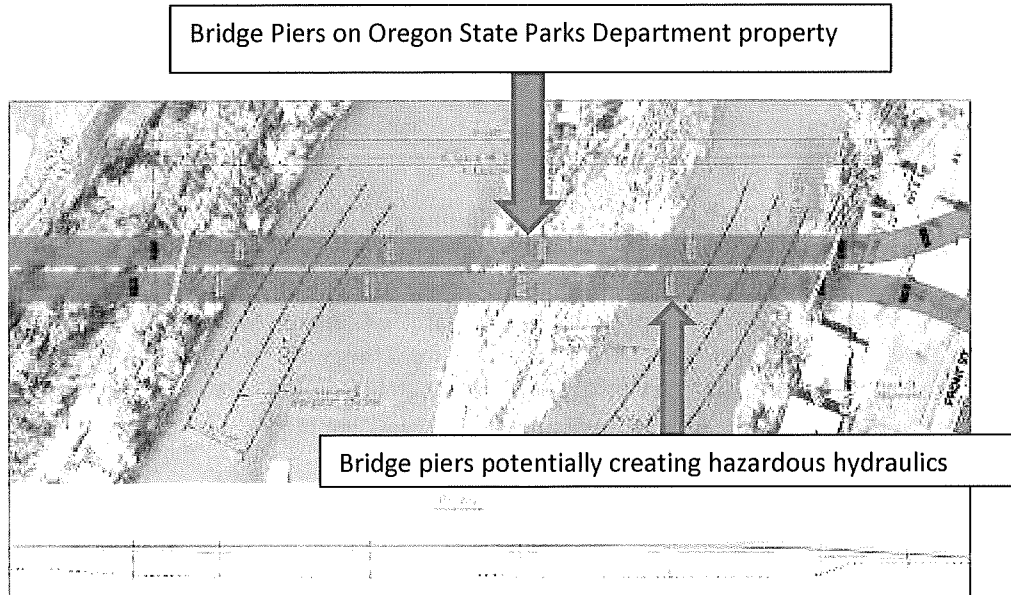
The Draft EIS and all public involvement have overlooked the fact that McLane Island Landing is an Oregon State Parks Department property (see attached map). McLane Island Landing is part of the Willamette Water Trail (see <http://willamettewatertrail.org/map/mclane-island/>), a federal designation made by the Secretary of the Interior. The draft EIS has failed to recognize either the ownership of the island by the Oregon Parks and Recreation Department or evaluate the impacts of the proposed bridge on the use of the island as a part of the Willamette Water Trail. McLane Island Landing is the only low impact camping spot in a significant reach of the river (more than 10 miles of river). For those of us that canoe or kayak the river, the presence of a bridge over the island would significantly diminish the experience and the construction of the bridge would provide both a temporary impact to river recreation and a permanent loss of use which is not discussed in the draft EIS. This oversight is compounded when looking at the environmental impacts of the proposed location.

The proposed bridge section, as shown in "Salem River Crossing Project Right-of-Way Technical Report Addendum" of August 2016, shows bridge piers on State Parks property and in locations that could affect recreational access and use of the island. The illustration below (taken from Salem River Crossing Project Right-of-Way Technical Report Addendum) shows bridge piers on McLean Island Landing and adjacent to the island in a manner that would create a hazardous condition for canoes and kayaks that wish to approach the island from the east channel.



## Glenn - Gibson Watershed Council

The Salem River Crossing Project Hydraulics Technical Report Addendum neither recognizes the small boat traffic nor the potential for impacts to small boat use of the channel between McLane Island Landing and the east bank of the Willamette nor effects of the piers on the evolution of the island.



**Your approval at this time will have long-term detrimental effects on the recreational use of the Willamette River and especially McLane Island Landing, an Oregon Department of Parks and Recreation property.**

### **Concern #2: Consideration of Floodplain Impacts and Regulations**

As many of you are aware, the federal Floodplain Management Program in the Pacific Northwest has been determined to have adverse effects on federally listed fish species. The National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) listed both the Upper Willamette River spring Chinook and the Upper Willamette River winter steelhead as threatened species in 1999. These two anadromous species travel to the ocean during their lifecycle and return to the fresh water of high Cascade tributaries to spawn. The reach of the Willamette River where the bridge is proposed is within the area designated as "critical habitat" for these species. Shallow water habitats along the river are used by juvenile salmon and steelhead as they return to the Ocean. Activities that impact the shallow water habitat such as bridge piers, abutment fill, and other fill in the floodplain will require formal consultation with NMFS during the permitting process.

In April of 2016, in a separate action, NMFS and the Federal Emergency Management Agency (FEMA) settled a lawsuit brought in 2011 by the issuance of a biological opinion on the way in which federal flood insurance and floodplain management actions can reduce the "take" of listed species in Oregon. The actions require, among other things:

- Revised mapping protocols to improve the identification of special hazard areas, including channel migration zones and areas of future risk.



## Glenn - Gibson Watershed Council

- Revised floodplain management criteria to provide greater certainty that the impacts of development in areas of high hazard will be avoided, minimized, and mitigated to protect natural floodplain functions.
- Compliance and enforcement strategies to ensure that effects of floodplain development pursuant to the NFIP are avoided or reduced throughout the action area.

The requirements include the provision that: "FEMA and NMFS' joint recommendation that new structures placed in the Special Flood Hazard Area (SFHA) should be elevated by methods other than fill,..."

Since the project remains in the evaluation phase (the Final EIS is not complete), and the project has no funding mechanism and therefore is unlikely to be constructed until after 2018, the requirements of the NMFS biological opinion need to be taken into consideration. Specifically the evaluation should include the avoidance and minimization requirements as listed in RPA Element 4: "Floodplain Management Criteria for Special Hazard Areas that Avoid, Minimize, and Mitigate Program Level Impacts." While the draft EIS discusses avoidance and minimization it does not specifically consider avoidance and minimization of flood plain function impacts or "protecting riparian habitat and functions within the high hazard area" as described in the biological opinion. This is not an engineering evaluation it is a biological evaluation. I would suggest this is a fatal flaw in the current consideration and could affect the outcome of the Final EIS.

The recently released Salem River Crossing Project Hydraulics Technical Report Addendum adds no clarity of how the project will comply with FEMA regulations, in fact the report points out that the project will raise the 100 year flood by 0.27 feet. The late breaking report concludes; ***"The preferred alternative would increase the base flood elevation 0.27 foot. Although small, even this elevation change would require substantial additional work to be acceptable— either to revise the bridge design during final design or to address permitting requirements associated with documenting and communicating these impacts to affected stakeholders. Agency consultation would be needed to assess permitting requirements for the preferred alternative and the need for associated studies. City of Salem and Polk County regulations do not allow any rise in the base flood elevation. Therefore, mitigation would be required as part of the preferred alternative as it results in a base flood elevation net rise."***

The consultants and staff are asking you to approve a project that fails to meet standards you adopted which are the current FEMA standards. It flies in the face of the known requirements that will be in place at the time of design and construction of the infrastructure projects. They provide the vague promise that "substantial additional work" and "associated studies" would be required which could result in a modified design or mitigation measures (unspecified).

**Your approval at this time does not comply with standards you have adopted and surely will not comply with the new requirements that will be required for the bridge and associated roadways.**

### **Concern #3: Encroachment on other waterways and wetlands**

The draft EIS identifies alternative 4A (the closest to the proposed alternative) as affecting more than 2 acres of wetland and nearly 9 acres of riparian habitat. With the additional construction of Marine Drive, additional encroachment on waterways tributary to the Willamette will be involved, all leading to decreased juvenile salmon rearing habitat in the floodplain. These are the very impacts that the FEMA-NMFS lawsuit was concerned about. These seemingly small and altered habitats have been shown to





## **Glenn - Gibson Watershed Council**

retain importance to juvenile salmon. For example, Randall Covin and other researchers from Oregon State University (Colvin, Randall et al. 2009. Fish Use of Intermittent Watercourses Draining Agricultural Lands in the Upper Willamette River Valley, Oregon. Transactions of the American Fisheries Society 138:1302–1313) have found that even ditches in ryegrass fields provide refuge habitat during high flows. The ball fields, backwater into the unnamed slough (see below), Glenn Creek, and low areas of Wallace Marine Park provide similar off-channel refuge during high flows.

The recent promises to not impact Pioneer Village structures by the construction of Marine Drive will force the roadway into the riparian area of a small tributary to the Willamette River, likely an old channel remnant (titled Unnamed Slough in the Draft EIS). This channel has year round flow, likely from subsurface discharges and storm runoff. This is an impact that is part and parcel of the River Crossing Project. The Final EIS must evaluate the impacts of these alterations to both the floodplain function and direct losses of riparian and wetland habitats. The impacts will likely require consultation with NMFS and could affect the Final EIS and subsequent permitting.

The Marine Drive-Riverbend Road connection will require crossing Glenn Creek. Glenn Creek in the area proposed for crossing is in the flood plain of the Willamette River and is used by adult winter steelhead during high flows. Passage of these fish will be necessary as a design factor for the crossing. In fact, the section of Marine Drive at this location is all in the floodplain. The Draft EIS, the Exceptions Report, and the Salem River Crossing Project Land Use Final Technical Report Addendum do not address the NMFS requirements for impacts to the floodplain. There is no description of the nature of the crossing or the impacts associated with this action. It is another area of minimizing the impacts of the project.

There was an extensive fish use survey conducted by the Oregon Department of Fish and Wildlife in 1999 that showed native cutthroat trout in Glenn Creek, Gibson Creek, Archer Brook and other streams draining to the Willamette from the west. I have attached the data which apparently was not available to the consultants.

**Your approval of the project will lead to further degradation of aquatic habitat used by federally Endangered Species Act listed Salmon and Steelhead.**

### **Concern #4: The Salem Willamette Greenway Program**

Salem is the Capitol City of Oregon and the second largest city in the state, yet the City has paid nearly no attention to the Willamette Greenway. The Greenway Program was adopted in 1979 and has not been significantly updated or reviewed in the 37 years since it was adopted. The Greenway Plan at the time was a minimalist approach and it remains so today. There has been **no** effort on the part of the City to seek the public sentiment about the Willamette waterfront other than the development of Riverfront Park and acquisition of the Boise Cascade property to add to Minto-Brown Island Park. While these projects have been well received, there is neither a comprehensive vision nor a consideration of the changed circumstances and understandings of the importance of the Willamette River and its floodplain in Salem over the last nearly 40 years. The proposed action will create an impenetrable concrete maze on the Willamette riverbank further isolating West Salem from the river and a concrete eyesore to users of Riverfront Park.

The proposed Goal 15 Exception was developed from the Draft EIS findings that are general to the area of the nine alternatives considered. The specific impacts of the current proposal have not been evaluated in detail. The findings are deficient in failure to recognize that Oregon State Parks has an ownership interest of McLane Island. It is identified on the City website maps as "Willamette Greenway



## **Glenn - Gibson Watershed Council**

McLane Island Landing” and is a part of the federally designated Willamette Water Trail. These facts are missing from all the information in the Draft EIS and Goal 15 Exception Draft. There is no evaluation of either temporary or permanent effects of bridge piers, bridge construction activity or other impacts to recreation use of the Willamette Water Trail of long term effects of scour or other impacts from changed hydraulics on McLane Island, an Oregon State Parks property.

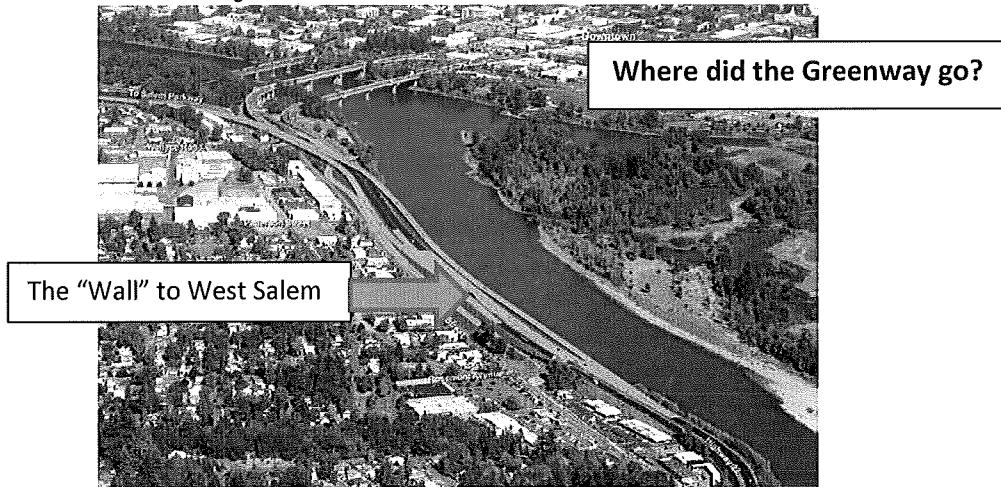
The discussion of the visual effects of the Willamette Greenway (Salem River Crossing Project Visual Resources Technical Report Addendum) is grossly skewed to views of the river from roads. I do not believe that this was the intention of the framers of the Greenway program when they were clear that the objective was “to protect and preserve the natural, scenic and recreational qualities of lands along the Willamette River...” In fact the proposed transportation plan amendment includes a significant commitment of the current Highway 22 berm along the Willamette River to connecting ramps creating a web of concrete along more than two thirds of a mile of the West Salem waterfront. It is bad enough to have an elevated state highway but to add a series of elevated ramps directly across from Riverfront Park and above Wallace Marine Park boat ramp eliminating the riparian vegetation along the Willamette River flies in the face of the finding that: “On balance, the preferred alternative will not have a significant adverse impact on Greenway scenic values.”

The Goal 15 exception states categorically that: “In summary, because the footprint for the preferred alternative minimizes direct impacts to active use areas of Wallace Marine Park (including canoe and boat launch areas), there is no significant reduction in sites available for water-related or water-dependent uses.” The conceptual bridge design shows the location of piers on a State parks ownership, part of the Willamette Water Trail and used for both overnight camping and local pull-outs by canoeists and kayakers. Without any evaluation of scour and hydraulics it is impossible to make such a statement. Bridge piers can be a navigational hazard to recreational water craft and any location of piers on or near McLean Island Landing will reduce the ability to use this State Park Island for overnight camping or even day use. The relationship of the bridge piers and the island is critical information for a factual evaluation of the potential impacts.

The discussion of the legislative intent of the Willamette Greenway Goal and ORS 390.314 seems to indicate that bridges should be a part of the Greenway. This discussion (page 4-82) appears to be solely from the perspective of a transportation engineer that ignores the many natural values of the river and its floodplain. While there are many bridges over the Willamette the framers of the measure likely wanted to see other uses of this valuable area considered. The discussion also raises the notion that fill in the Greenway can “...remain compatible with the preservation of Greenway values to the greatest degree possible.” This is an incredible conclusion; much like “We had to destroy the village to save it.”



## Glenn - Gibson Watershed Council



I would recommend a more direct approach of acknowledging that the bridge and especially the associated transportation structures (Marine Drive, flyover connections to Highway 22, etc.) will have significant adverse impacts to the Willamette Greenway in Salem. You can argue that there are mitigation circumstances or overwhelming need but it is a disservice to minimize the impacts since they will last for more than a generation and your grandchildren's grandchildren will be living with the result.

The approach of the City is reflected in the cynical approach to the designation of land added to the Urban Growth Boundary (UGB) as Parks/Open Space. The designation shows the total disregard the City has for Parkland and for Open Space. The intended use of adding land to the UGB is to construct streets and other transportation facilities. A significant portion of the "Parks/Open Space" will be under asphalt. Does the City council truly believe that is the legacy they wish to leave; the fiction of highways as parks/open space?

The bottom line is that Salem has never seriously looked at the Willamette Greenway as an opportunity to work with the community to develop a vision of the future of this critical interface between the urban environment and the incredible resource of the Willamette River. The perfunctory development of a Greenway program to meet Statewide Goal Requirements in 1979 with no further review, only minor ordinance adjustments, and a history of non-enforcement has resulted in the ability to justify nearly anything in this critical interface. The City and citizens of Salem deserve better.

**Your approval of the Goal 15 Exception will result in a wall being built between West Salem and the Willamette River. The conclusions of the exception understate the impacts and overstate the benefits.**

### **Concern #5: Impacts to Agricultural Lands**

The Glenn-Gibson Creek watershed is unique in that agricultural lands occupy both the upper end of the catchment and the lower end of the catchment with urban development between. While this is not a "pristine" watershed the location of agricultural lands and their uses help to ameliorate the urban impacts to the watershed. Significantly, agricultural uses in the lower watershed (floodplain of the Willamette) help to dissipate some of the altered hydrologic effects of impervious surfaces in the mid watershed and buffers the urban area from the Willamette floodplain. The loss of some 20 acres of agricultural land and replacing it with impervious surface (street intersection) will further degrade the watershed and add pollutants to the Willamette River.



## Glenn - Gibson Watershed Council

### **Concern #6: Neighborhood disruption and loss of businesses**

The project would displace "between 45 and 55 residential units and an estimated 55 to 65 businesses". This is a significant price to pay for a very expensive project that fails to address other direct environmental concerns. The watershed council has been approached by concerned citizens to determine if there is any way to protect the resources they hold dear.

The Goal 15 exception fails to identify and evaluate the impacts to Oregon State Parks property at McLean Island Landing. The exception as drafted fails to evaluate the visual impacts of the associated transportation facilities from Riverfront Park and the Willamette River other than stating "the use of sensitive designed architectural elements and details..." will mitigate for the nearly one mile of elevated ramps and supports. This bald assertion belies common sense. No one would consider a network of concrete roadways as a compatible visual amenity to the river environment. You could as easily argue that you are providing cover for all the homeless in Salem with this proposal.

The conclusion of the exception is that the preferred alternative is not "significantly more adverse" than other alternatives. This is not the standard for a Statewide Goal exception. The standard for a goal exception (from Goal 2) is: "The following standards are met:

- (1) Reasons justify why the state policy embodied in the applicable goals should not apply;
- (2) Areas which do not require a new exception cannot reasonably accommodate the use;
- (3) The long-term environmental, economic, social and energy consequences resulting from the use of the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed site; and
- (4) The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts."

I suggest it is difficult to argue that the long term environmental impacts from the project can be justified. I am not conversant with the arguments about economic, social or energy consequences and will let others speak to those. Thank you for your serious consideration.

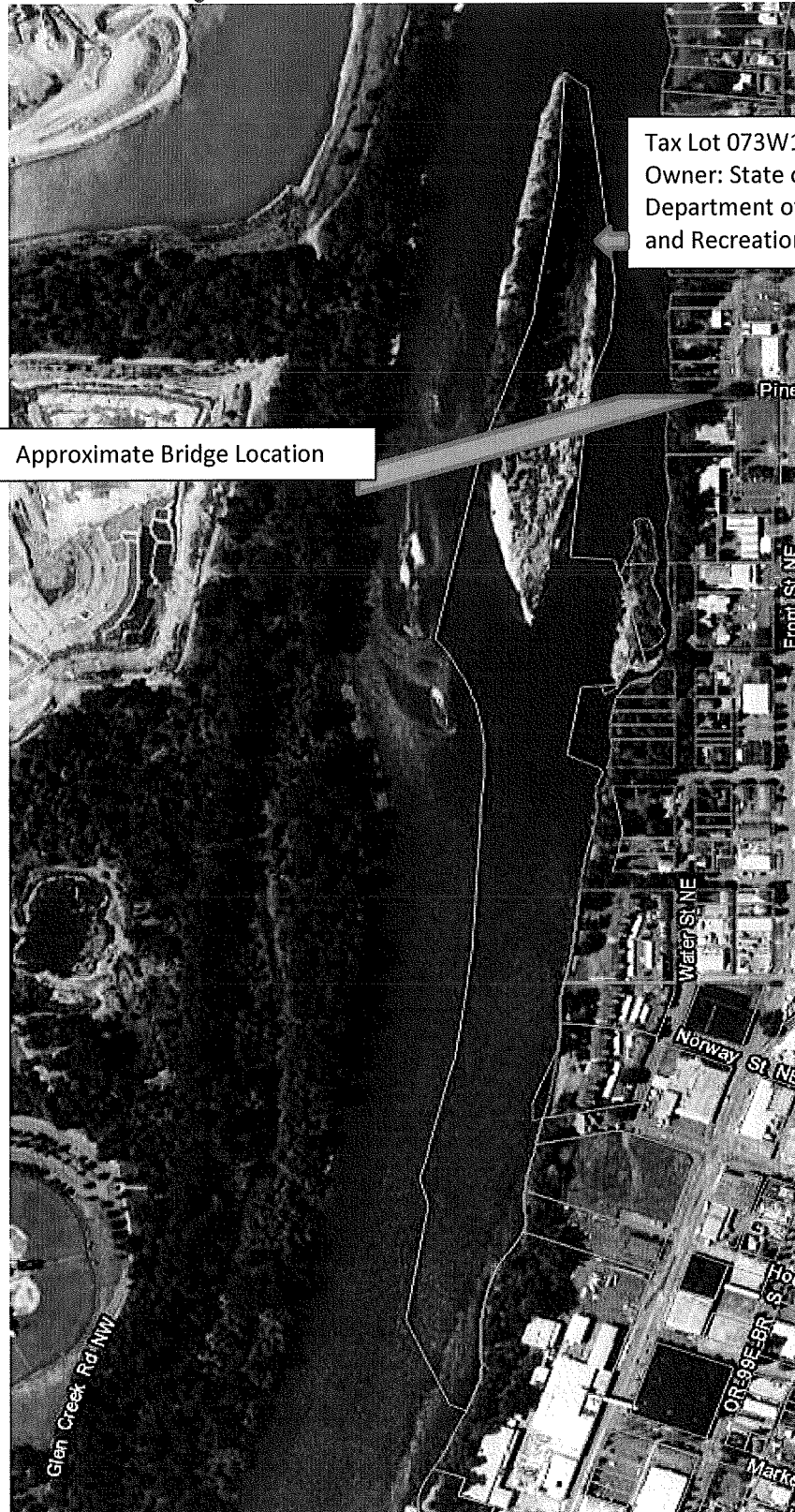
**The concerns that we have raised are substantial and we believe identify significant deficiencies in the current proposal. It seems premature to make a formal decision that commits public resources to a project that has such significant long-term effects without a public discussion using the current proposal and more complete information about the long-term effects of the project.**

Sincerely,

Kenneth F. Bierly, Chair  
Glenn and Gibson Creek Watershed Council



# Glenn - Gibson Watershed Council



**McLean Island Landing, State Ownership**

## Errors and Factual Concerns with the City of Salem Findings

### Policy Framework

#### State law

The overarching goal of the Willamette River Greenway is based in state statute at ORS 390.310-390.368. The policy of the state Willamette River Greenway program is to: “protect and preserve the natural, scenic and recreational qualities of lands along the Willamette River...for public education and enjoyment.”

#### City of Salem Willamette River Greenway Plan

The City adopted Willamette River Greenway Plan has the purpose to achieve the “following objectives:

- A. To protect and enhance the natural, scenic, recreational, historical and economic resources of the Willamette River corridor.
- B. To make the natural, scenic, recreational, historical and economic resources available for the proper use and enjoyment of the Salem urban area resident.
- C. To balance the needs and demands of commerce, industry and people for access to the unique resources of the river.
- D. To allow for use and development consistent with the Greenway concept and the Salem Area Comprehensive Plan policies.
- E. To allow and encourage a variety of recreational developments and types of public access to and along the river while preserving, protecting and enhancing the scenic qualities of the river and the riparian environment.”

#### The West Salem Neighborhood Plan

The neighborhood plan has the vision to “Rediscover the Willamette River”. The Willamette River Greenway should be expanded and extended to provide more opportunities to access the river throughout West Salem.” In addition, the Plan has the vision to “Preserve and expand natural resource areas Natural resources and open spaces should be preserved and enhanced.”

The Neighborhood adopted the Following goal specific to the vision:

“GOAL 7

To conserve, restore, and reclaim open space and natural resources including the Willamette River Greenway, stream corridors, wildlife habitat, tree groves, and significant mature trees.”

Policies to implement the Goal were adopted by the West Salem Neighborhood Plan were:

“Natural Resource Function

7.1 Maintain, and when possible, restore the natural resource functions and intrinsic values of all designated stream corridors, significant wetlands, designated riparian areas, and significant trees in West Salem.

7.2 Require preservation and maintenance of open space consistent with conditions of development approval including: a) Preventing the removal of trees and non-invasive vegetation except as provided by the City of Salem Tree Ordinance (SRC Chapter 68) and b) Removal of invasive vegetation and replanting with native species where appropriate, unless such action compromises slope stability.

Willamette River

**7.3 Regard the Willamette River as a significant natural resource and public amenity. New development shall give priority to river and floodplain functions, provide public access to the banks of the river, and encourage restoration and other compatible uses of the banks (emphasis added).**

Additional policies in the West Salem neighborhood Plan address streams.

## Errors and Factual Concerns with the City of Salem Findings

### “Stream buffers

Encourage the City to implement the use of buffers along stream corridors that follow the identified FEMA flood plain boundaries where practicable to allow for maximum flood plain functionality. Buffers may include building setbacks, restricted or limited use areas, or other methods that protect the flood plain function of the stream corridor.”

**All of these policies address resources affected by the proposed project. The Goal 15 exception proposes to address the changes to the City of Salem Greenway plan but does not address the West Salem neighborhood Plan. Adoption of the exemption would create a conflict between the City comprehensive plan and the West Salem Neighborhood Plan.**

### Standards for an Exception

One of the purposes of an exception is to: “Assure that citizens and governmental units have an opportunity to participate in resolving plan conflicts while the exception is being developed and reviewed”(OAR 660-004-0000(3)(a)) .

Posting more than 50 highly technical documents and detailed findings that run more than 275 pages just a week before the hearing is more of a way to assure the public in unable to have the opportunity to participate in any meaningful way. There has been no way to resolve plan conflicts while the exception was being developed. The process has been developed with extremely limited opportunity to explore the consequences of a significant decision that will affect the public for generations.

**The City has failed to meet the obligation of State Administrative Rule to ASSURE citizens and governmental units have an opportunity to participate.**

An additional standard for exceptions is: “Assure that findings of fact and a statement of reasons supported by substantial evidence justify an exception to a statewide goal” (OAR 660-004-0000(3)(b)).

The findings to support the exception to: “protect and enhance the scenic resources of the Willamette River corridor” is: *“In summary, based on the evidence in the DEIS and the Visual Resources Technical Report Addendum (2016), the Preferred Alternative will have some impact, but not a significant adverse effect, on Greenway scenic values. In addition, the new bridge, and associated bicycle and pedestrian facilities on and off the bridge, would provide additional opportunities for views of the Willamette River, McLane Island, and Wallace Marine Park and riparian areas that aren’t available today.*

*Also, many people find bridges to be attractive and they become part of the character of the city. While some people may find a new bridge over the river to detract from the scenic qualities of the river, others may conclude that it enhances those scenic qualities. In the subsequent Greenway Development Permit phase, the public and decision-makers will have an opportunity to review the bridge design details and bicycle and pedestrian facilities and amenities, to ensure that the new bridge results in an overall net positive impact on the visual and scenic quality of the Willamette River Greenway.*

*Potential measures to avoid, minimize, and mitigate for adverse impacts to scenic values identified in the EIS include, but are not limited to:*

- *The use of sensitively designed architectural elements and details to be integrated with, complement, or otherwise enhance existing and new features.*
- *A sustainable, functional, and aesthetic landscape design.*

## Errors and Factual Concerns with the City of Salem Findings

- *Increased spacing between bridge columns to open up views under bridge structures.”*

While there is a visual assessment it is conducted from the inverse perspective of the Willamette Greenway. All the viewpoints are established from the upland looking at the river. None are from the river looking at the City. This inversion of perspective allows the impacts to be minimized. In addition the argument that “many people find bridges to be attractive” is neither substantiated in the record nor relevant to the impacts to the Willamette River Greenway. Views of concrete abutments and bridge support systems are not one of the protected resources in the Willamette Greenway program. The oversight is compounded when the impact to the views from Riverfront Park, while subjectively rated as “an impact of moderate significance”. The removal of all riparian vegetation, placing fill to widen Highway 22, and placement of a wall of bridge supports and decks for more than 2/3 of a mile along the west riverbank directly across from the highest use public facility in Salem seems to have more than “moderate significance”. There is a permanent loss of Willamette River Greenway resources that is minimized in the City findings and putting lipstick (architectural elements) on the wall will not ameliorate the visual impact of the structures.

The findings do not address the West Salem Neighborhood Plan vision that: “The Willamette River Greenway should be expanded and extended to provide more opportunities to access the river throughout West Salem.” The barrier being proposed is inconsistent with the West Salem neighborhood Plan.

**The findings of visual impacts to the Willamette River Greenway are not supported by substantial evidence and the findings language is written as justification not supported by substantial evidence in the record. The City has used subjective evaluation rather than survey or other forms of evaluation that would provide evidence. The City has substituted their perceptions of preference (many people find bridges to be attractive) to those based on evidence.**

The findings concerning natural resources is summarized as: *“Based on evidence in the DEIS and FEIS technical report addendums in the record and summarized above, the Preferred Alternative will not have a significant adverse effect on Greenway natural values at the new bridge crossing location or where the footprint of OR 22 is expanded onto the riverbank, but not over or into the Willamette River.”*

The Salem Willamette River Greenway Plan identifies “... the floodplain of West Salem, and the east bank of the Willamette River are considered valuable natural resources”. These two areas are called out along with Minto Island as “Significant Natural and Scenic Areas” in the plan. It is these two areas that are the focus of impacts from the proposed action. Other sites not so designated have been rejected.

Again the findings minimize the impacts. The loss of nearly 2/3 mile of riparian vegetation along the west bank of the Willamette to build Highway 22 ramps and lanes is more than insignificant. The discussion in the findings of the historic impacts to the Willamette River should lead to the conclusion that projects such as this are what led to the simplification over time. The incremental loss has accumulated to the point where additional losses to the floodplain habitat and riparian vegetation have become acute. The additional loss of floodplain is an impingement on critical habitat of listed Chinook salmon and steelhead. There is a growing understanding of the importance of off channel habitats for Chinook salmon. The use of the backwater areas of lower Glenn Creek, unnamed slough and the floodplain during high water periods is quite likely. The evidence used to formulate the conclusion of no significant impact is incomplete and recent information about the significance of these areas to juvenile



## Errors and Factual Concerns with the City of Salem Findings

fish is not used. The evidence fails to articulate why the sites identified as significant in the City Plan became the preferred alternative.

**The findings of natural resource impacts fail to include recent information on the importance of floodplain habitats to listed species. The findings minimize the significance of impacts and have incomplete evidence for the findings presented.**

The findings concerning the recreational resources of the Willamette River Greenway are concluded as: *“Based on the above information, it is determined that the placement of fill within the Greenway to construct the Preferred Alternative will have some adverse effect on Greenway recreational values, the overall effect is small and does not rise to the level of being a “significant” adverse effect.”*

The City of Salem Willamette Greenway Goal is: *“To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River”* (emphasis added). The exception concludes that there will be no significant adverse effect.

This staff report refers to the draft 4(f) report completed in 2012 for the alternatives considered at that time. That report and the staff findings are deficient in that they fail to recognize Oregon Parks and Recreation Department ownership of McLean Island Landing. Additionally, the Willamette Water Trail is not mentioned in the 4(f) report and only in passing in the findings. This is a significant oversight and a factual concern with the completeness of the evaluation. All the consideration of recreation use is from the upland use of City Parks. The Willamette River Greenway includes McLean Island Landing (see ORS 390.318 (1) *“The Willamette River Greenway shall also include all islands and all state parks and recreation areas situated along the Willamette River”*). The Greenway Goal specifically requires public access to the river *“c. Access -- Adequate public access to the river shall be provided for, with emphasis on urban and urbanizable areas”*. The City has failed to evaluate the effects of recreational small craft use of McLane Island Landing and the effects of the bridge piers on that use. There is a good argument that such impingement constitutes a significant 4(f) consideration. Failure to recognize the river use and Oregon Parks and Recreation Department ownership raises questions about the conclusion above.

**The findings of impacts to recreation use of the Willamette Greenway are based on incomplete facts and given the full range of facts the conclusions are not supported by the evidence available.**

Construction in the floodplain and floodway is regulated by City code (chapter 601) and has the standard for new bridges as; *“601.105. Bridges within the Regulatory Floodplain. Bridges within the regulatory floodplain shall comply with the following requirements:*

*(a) Construction of new vehicular bridges shall have the lowest structural member of the bridge at least one foot above the base flood elevation.*

*(b) Repair or replacement of existing vehicular bridges shall not increase the water surface elevation of the base flood discharge.*

*(c) Construction or repair of pedestrian bridges shall not increase the water surface elevation of the base flood discharge. (Ord No. 31-13).”*

While the language is unclear, it is easily interpreted to mean that new bridges should not increase the water surface elevation of the base flood. Base flood being defined as; *“Base flood: The flood having a one percent chance of being equaled or exceeded in any given year. Base flood also referred to as the*

## Errors and Factual Concerns with the City of Salem Findings

"100-year flood." The findings of for the project demonstrate that there is a 0.27 foot increase in the base flood from the proposed project. This appears to not comply with existing floodplain ordinances of the City.

The National Marine Fisheries Service has determined that impacts from the implementation of current floodplain regulations will result in "take" of listed salmon and steelhead in the Willamette River. They have issued a biological opinion to the Federal Emergency Management Agency that includes required actions over the next few years. The requirements will result in revised floodplain mapping and floodplain management requirements. The proposed findings of fact ignore the conclusion of the NMFS that floodplain development constitutes "take" and that the proposed project does not meet current standards, let alone standards that would apply at a later date more in time with bridge design and construction.

This creates two problems; first the current proposal is not consistent with current City requirements, second, if redesigned to meet future requirements, the project could be significantly different and the analysis and action being taken now would be irrelevant.

**The proposal does not meet current City Ordinance requirements and the findings of significance by NMFS are not considered in the Natural Resource impacts.**

The finding related to water dependent uses concludes: *"In summary, because the footprint for the Preferred Alternative minimizes direct impacts to active use areas of Wallace Marine Park (including canoe and boat launch areas), there is no significant reduction in sites available for water-related or water-dependent uses and the legal standard in OAR 660-004-0022(6)(b) has been met."*

The findings focus on the boat launch facility at Wallace Marine Park and the limitations to public access to the Willamette River because of steep banks. The entire discussion ignores the water dependent access to McLane Island Landing and the impacts to water dependent uses of the Landing from bridge piers on the island and adjacent to the island.

**The findings fail to include relevant facts that do not support the conclusion. There are additional factors related to small boat use of the Willamette River that are not considered when developing the conclusion. The conclusion is not supported by substantial evidence when all evidence is considered.**

The discussion of the public benefit is entirely constructed to retell the benefits of a bridge, not just this bridge. There is no description of the tradeoff in public values and concerns between livability provided by the Willamette River Greenway as based in Federal, State, City, and Neighborhood policy and vehicle transportation improvements. It is clear that such a tradeoff analysis is difficult; however that is what an exceptions process is designed to bring out. The difficulty you have is making judgements about what future we wish to leave our grandchildren and their children. Because it is difficult it should not be dodged by arguing only one side of the issue. The citizens of Salem deserve a more thoughtful consideration of the tradeoffs being proposed.

The admonition in administrative rule is clear: *"The conclusion shall be based on findings of fact supported by substantial evidence in the record of the local proceeding and by a statement of reasons that explains why the proposed use not allowed by the applicable goal, or a use authorized by a statewide planning goal that cannot comply with the approval standards for that type of use, should be*

## Errors and Factual Concerns with the City of Salem Findings

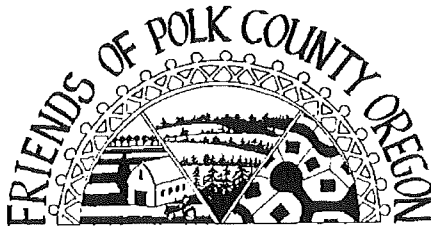
*provided for. The exceptions process is not to be used to indicate that a jurisdiction disagrees with a goal."*

**The findings fail to justify the conclusion with arguments that describe the tradeoffs and the long term consequences of such tradeoffs.**

The designation of plan and zone designation as described in the findings is a sad irony. The proposal that: *"The proposed Greenway goal exception only authorizes the components of the Preferred Alternative (bridge piers and cut and fill for related transportation improvements) within the Greenway Overlay. No other uses are justified in the Greenway goal exception. Existing plan and zone designations will be maintained for the portion of the Preferred Alternative A that is within the existing UGB and Salem city limits. Salem will apply the Parks/Open Space/Outdoor Recreation designation of the Salem Area Comprehensive Plan to the approximately 35 acres added to the UGB."*

The designation of lands intended for concrete and asphalt transportation facilities as "Parks/Open Space/Outdoor Recreation" may be expedient for the staff but shows a total disregard for the importance of parks and open space in Salem and looks like a cynical ploy to fool the uninformed. To suggest the City is adding 35 acres of parkland to the Urban Growth Boundary while planning to pave most of it is both disingenuous and cynical. There may be reasons for such an approach but the findings do not disclose them nor hide the cynical ploy.

**There are no findings that support and no basis in evidence for the zone designations proposed.**



October 8, 2016

Polk County Planning Commission  
Polk County Board of Commissioners  
Salem City Council  
Marion County Board of Commissioners  
Keizer City Council  
Keizer Planning Commission

RE: Salem River Crossing Proposal Case File: CA 16-04

I am speaking on behalf of Friends of Polk County, a citizen organization working with our Community Development Department to protect and enhance our quality of life by building livable urban and rural communities, protecting family farms and forests and conserving important natural areas.

We are submitting this testimony to reflect the fact that many residents of Polk County are NOT in favor of the current proposal to build a 3<sup>rd</sup> bridge in Salem. The complicated and questionable process of expanding Salem's UGB is not justified for the following reason:

- Oregon Land Use Planning Goal 14 requires "Prior to expanding an UGB local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the UGB. We submit that upgrading the existing bridges to state of the art earthquake standards and adding lanes to accommodate additional traffic would be a wiser and far less expensive solution to several problems:
  - o 1) Less ecological impact to waterfront and river channel,
  - o 2) Shorter distance across river,
  - o 3) Less disruptive and destructive of existing neighborhoods, residences and businesses,
  - o 4) Existing bridges are inside the UGB so no complex process to expand UGB,
  - o 5) Less financial burden on citizens

We are quite certain that when the cost of the bridge becomes clear to Polk County residents along with the possible means to pay for it resistance may well be overwhelming. Population projections supporting a new bridge must be accurate and current. If they are anything less the

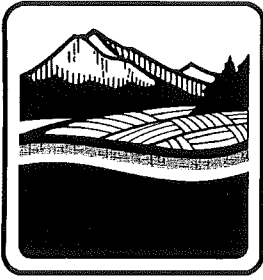
whole project will be questionable. If we don't need a 3<sup>rd</sup> bridge, there is no need to expand the UGB to accommodate transportation needs.

There are at least two smarter and cheaper ways to ease congestion on the current bridge: (1) Encourage more use of flex hours for people with jobs in Salem. and (2) Improve public transportation between rural Polk County and Salem and between West Salem and Salem. The League of Women Voters published a major review of Public Transit in Polk and Marion Counties in 2012. Several relevant findings are reported. Substantial ridership fluctuations on Cherrits are associated with variations in level of service. Levels of service are dependent on revenue available. Return of Saturday service is a high priority. Dependency on transit will increase as the "baby-boom" population ages. Finally, costs of providing additional transit service and/or infrastructure are less than major road construction projects like additional bridges or freeway widening.

The character, charm and integrity of Polk County lie in its rural qualities, its natural resource based economy and its several small towns. Sending more long distance traffic out Highway 22 will enhance none of these positive qualities but will contribute to Lancaster-like sprawl spreading ever westward. If there is money to be had it would be wiser to invest in revitalizing the downtowns of Dallas, Independence and Monmouth so folks will be less tempted to drive across the bridge to Salem – therefore relieving congestion and the need for a new bridge and the need for an expansion of the UGB.

Thank you,

Tremaine Arkley  
President, Friends of Polk County



# Marion County OREGON

## PUBLIC WORKS

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### MEMORANDUM

**TO:** Julie Warncke, Transportation Planning Manager, City of Salem

**FROM:** Brandon Reich, Senior Planner, Marion County Planning BR

**SUBJECT:** 2035 Population Forecast, Salem Third Bridge

**DATE:** October 11, 2016

In 2009, both Marion County and Polk County adopted coordinated forecasts for the cities of their counties. At that time, Oregon Revised Statute 195.036 required: "The coordinating body under ORS 195.025 (1) shall establish and maintain a population forecast for the entire area within its boundary for use in maintaining and updating comprehensive plans, and shall coordinate the forecast with the local governments within its boundary."

Portland State University prepared a population forecast for the urban growth boundary of Salem and Keizer. PSU forecasted a population of 299,980 for the UGB for the year 2030 (attached). Marion County adopted the Marion County portion of that forecast, 261,484, into the background and inventory component of its comprehensive plan in 2009 (Table 22, attached). Polk County adopted the Polk County portion of that forecast, 38,496, into its transportation system plan, a component of its comprehensive plan (attached). Both of the counties' comprehensive plan amendments were submitted to the Department of Land Conservation Development and acknowledged by the department.

Now, the City of Salem is using that coordinated population forecast for its consideration of an urban growth boundary amendment for a third bridge crossing over the Willamette River. The total population forecasted for the Salem/Keizer Urban Growth Boundary for 2030 by PSU was 299,980. Salem has applied an average annual growth rate of 1.1% to extend the forecast by 5 years to 2035, yielding a 2035 forecasted population of 316,479 for the UGB. The growth rate Salem used is the same growth rate PSU forecasted for the final 5 year period of the UGB forecast. Salem's forecast is also the same used in the SKATS Regional Transportation System Plan (attached). Using the same forecast as the regional transportation plan is appropriate when planning for a regional transportation facility.

Although the authority for non-Metro counties to coordinate forecasts under ORS 195.036 was removed by legislation in 2013 (HB 2253), recent rulemaking provides a means to extend a coordinated forecast for up to 10 years on an interim basis until the first forecasts prepared by Portland State are complete (June 2017 for Marion and Polk counties). Oregon Administrative Rule 660-032-0040 provides:

- (1) If a local government outside the Metro boundary initiates a periodic review or other legislative review of its comprehensive plan that concerns an urban growth boundary or a matter authorized by section (2) of this rule before the date the PRC issues a final population forecast for the local government in the first forecasting cycle described in OAR 577-050-0040(7), the local government may continue its review using the population forecast that was acknowledged before the review was initiated, provided the forecast was:
  - (a) Adopted by the local government not more than 10 years before the date of initiation, as a part of the comprehensive plan, consistent with the requirements of ORS 195.034 and 195.036 as those sections were in effect immediately before July 1, 2013, and
  - (b) Acknowledged as provided in ORS 197.251 or 197.625 prior to the effective date of this rule.

Salem has initiated a legislative review of their comprehensive plan to consider adding land to the Salem/Keizer Urban Growth Boundary. The coordinated forecasts being used by Salem were adopted by Marion and Polk Counties in 2009 into their respective comprehensive plans, seven years before Salem initiated their review.

- (2) *The authorization to use the forecast described in section (1) applies only to a periodic review or a legislative review of the comprehensive plan that concerns:*
  - (a) *An urban growth boundary review or amendment as provided in Goal 14 and OAR 660, div 24;*
  - (b) *Economic development (Goal 9);*
  - (c) *Housing needs (Goal 10);*
  - (d) *Public facilities (Goal 11); or*
  - (e) *Transportation (Goal 12).*

Salem's amendment concerns the Transportation aspects of their comprehensive plan and transportation system plan.

- (3) *For purposes of section (1) of this rule, if the acknowledged forecast was adopted by the applicable county, and if the forecast allocates population forecasts to the urban areas in the county but has not been adopted by a particular city in that county, the city may apply the allocated forecast as necessary for the purposes described in section (2) of this rule.*

Marion and Polk Counties adopted their coordinated forecasts respectively and the forecasts allocate population forecast to the urban areas in each county. The rule allows the city to apply the forecast to their amendment proposal.

*(4) If the forecast is consistent with sections (1)(a) and (1)(b) of this rule but does not provide a forecast for the entire applicable planning period for a purpose described in section (2), the local government may apply an extended forecast for such purpose. The extended forecast shall be developed by applying the long term growth trend that was assumed in the acknowledged forecast, for the particular planning area, to the current population of the planning area.*

As described above, the forecast is consistent with sections (1)(a) and (1)(b) of the rule, but only forecasts a population until the year 2030. In order to extend the forecast to the end of the planning period, 2035, the long term growth trend that was assumed in the acknowledged forecast must be applied to the current population of the planning area. Section 8(d) defines “current population of the planning area” for an urban area: “the PRC estimate of population of the city at the time the review is initiated, plus the population for the area between the urban growth boundary and the city limits as determined by the most recent Decennial Census published by the U.S. Census Bureau.”

The Salem Transportation System Plan provides a 2010 population estimate for the Salem/Keizer Urban Growth Boundary of 230,118 (attached). The first step to identify the current population of the planning area is to determine the unincorporated population in the urban growth boundary by subtracting the incorporated portions of the cities from the total UGB population:

	Salem TSP	2010 Census		UGB minus Salem minus Keizer
	Salem/Keizer UGB	Salem Incorporated	Keizer Incorporated	UGB Unincorporated
2010	230,118	154,637	36,478	39,003

Next, hold constant the unincorporated UGB population from 2010 to 2015, and add in the PSU population estimates for the incorporated cities from the beginning of the planning period:

	Salem plus Keizer plus unincorporated	2015 PSU Estimate		Hold constant from 2010
	Salem/Keizer UGB	Salem Incorporated	Keizer Incorporated	UGB Unincorporated
2015	236,678	160,690	36,985	39,003

Thus, the current population of the planning area is 236,678. This population is grown to the end of the planning period, 2035, by applying the long term growth trend identified for the UGB by PSU and incorporated into Marion County’s Background and Inventory Report containing the coordinated forecast (Table 24, attached). The growth rate for the UGB is 1.2%. Growing the 2015 population of the planning area, 236,678, by 1.2% for 20 years, yields a forecast for 2035 of 300,447.

*(5) If the local government initiates a periodic review or other legislative review that concerns an urban growth boundary or other matter authorized by section (2) of this rule before the issuance by PRC of a final population forecast for the local government, and if that review would be based on a population forecast that was adopted and submitted to the department prior to the effective date of this rule as provided in OAR 660-032-0000 (2), but which is not*



*acknowledged by the effective date of this rule, the local government may continue its review using that forecast provided the forecast is acknowledged prior to the local government's adoption of any final land use decision or periodic review task resulting from such review.*

Marion and Polk Counties coordinated forecasts were adopted and acknowledged in 2009; section (5) does not apply.

*(6) If the local government does not have a forecast that meets the requirements of sections (1)(a) and (1)(b) or section (5) of this rule, the local government may adopt an interim forecast for purposes described in section (2) of this rule. The interim forecast must be based on the average annual (annualized) growth rate for the planning period in the most recent population forecast for the county issued by the Oregon Office of Economic Analysis (OEA), consistent with section (7) of this rule. The local government shall adopt the interim forecast following the procedures and requirements in ORS 197.610 to 197.650 and shall provide notice to all local governments in the county.*

Marion and Polk Counties coordinated forecasts were adopted and acknowledged in 2009; section (6) does not apply.

*(7) The interim forecast described in section (6), for a particular planning area, must be developed by applying the annualized growth rate in the most recent OEA forecast, to the current population of the planning area.*

This rule applies to section (6). Marion and Polk Counties coordinated forecasts were adopted and acknowledged in 2009; therefore, section (7) does not apply.

The forecast Salem used in its amendment proposal is 316,479. The forecast determined using the provisions in Oregon Administrative Rule 660-032-0040 is 300,447. These forecasts are 5% different. However, the higher forecast has been adopted into Salem's transportation system plan, adopted into the regional transportation system plan and is being used to plan for a regional transportation facility; therefore, the forecast of 316,479 is appropriate to use.

**Population Forecasts  
for  
Marion County, its Cities and  
Unincorporated Area  
2010-2030**

**Revision 1, Appendix 3 replaced**

**Project Staff:**

Risa Proehl, Demographic Analyst  
Charles Rynerson, Demographic Analyst  
Ken Radin, GIS Analyst  
Joseph Smith-Buani, Research Associate

Marion Co (unicorp)	Pop	# Ave Ann Pop Growth	% Ave Ann Pop Growth	% Pop 65+	% Pop Hispanic	Hseholds	Hsg Units	# Ave Ann Hsg Growth	% Ave Ann Hsg Growth	Occpncy Rate	PPH	GQ pop	Births	Schl Enrft*
1990	71,882			12.4%	5.9%	25,426	26,460			96.1%	2.79	975	962	
2000	79,555	767	1.0%	12.2%	13.3%	27,960	29,581	312	1.1%	94.5%	2.81	870	1,161	52,271
2005	81,420	373	0.5%			28,639	30,298	143	0.5%	94.5%	2.81	870	1,188	56,899
2010	84,985	713	0.9%			29,770	31,495	239	0.8%	94.5%	2.83	840		59,144
2015	87,783	560	0.6%			30,821	32,413	184	0.6%	95.1%	2.82	840		
2020	91,565	756	0.8%			32,194	33,856	289	0.9%	95.1%	2.82	877		
2025	94,516	590	0.6%			33,283	34,998	228	0.7%	95.1%	2.81	877		
2030	97,541	605	0.6%			34,387	36,158	232	0.7%	95.1%	2.81	913		

\*Total public school enrolled in school district(s) in which area is located; 2007 enrollment number is placed in '2010' cell.

Salem- Keizer UGB	Pop	# Ave Ann Pop Growth	% Ave Ann Pop Growth	% Pop 65+	% Pop Hispanic	Hseholds	Hsg Units	# Ave Ann Hsg Growth	% Ave Ann Hsg Growth	Occpncy Rate	PPH	GQ pop	Births	Schl Enrft*
1990	159,677			14.1%	5.8%	60,635	62,911			96.4%	2.48	9,437	2,676	
2000	203,966	4,429	2.4%	12.2%	14.7%	75,513	79,983	1,707	2.4%	94.4%	2.58	9,331	3,240	35,108
2005	217,284	2,663	1.3%			80,734	85,467	1,097	1.3%	94.5%	2.56	10,557	3,380	38,873
2010	233,864	3,316	1.5%			86,246	91,304	1,167	1.3%	94.5%	2.59	10,193		40,144
2015	250,246	3,276	1.4%			92,724	97,545	1,248	1.3%	95.1%	2.59	10,193		
2020	267,780	3,507	1.4%			99,485	104,656	1,422	1.4%	95.1%	2.58	10,636		
2025	283,422	3,128	1.1%			105,672	111,161	1,301	1.2%	95.1%	2.58	10,636		
2030	299,980	3,312	1.1%			112,062	117,877	1,343	1.2%	95.1%	2.58	11,079		

\*Total public school enrolled in school district(s) in which area is located; 2007 enrollment number is placed in '2010' cell.

**MARION COUNTY**

**COMPREHENSIVE LAND USE PLAN**

**BACKGROUND AND INVENTORY REPORT**

PREPARED BY  
MARION COUNTY PLANNING DIVISION

ADOPTED March 31, 1982  
Revised 10/98  
Revised 05/00  
Revised 11/04  
Revised 2009

cities are shown in Table No. 22. The methods used to develop the preliminary projections were a combination of demographic and housing unit models, including a consideration of additional information provided by local jurisdictions.

**Table No. 22**  
**Population – Actual and Projected Marion County and Incorporated Areas Within Marion County**

Jurisdiction	1990	2000	2007	2030 <sup>1</sup>	aagr 2010 – 2030
Marion County	228,516	284,834	311,070	410,245	1.20%
Aumsville	1,660	2,989	3,300	5,706	2.20%
Aurora	597	664	955	1,825	2.54%
Detroit	331	262	265	371	1.70%
Donald	314	607	995	2,034	3.20%
Gates <sup>2</sup>	466	437	460	487	0.23%
Gervais	999	1,923	2,250	4,597	2.80%
Hubbard	1,901	2,458	3,095	4,718	1.85%
Idanha <sup>2</sup>	160	131	145	170	0.63%
Jefferson	1,810	2,488	2,590	5,121	2.44%
Mill City <sup>2</sup>	309	316	328	367	0.53%
Mt. Angel	2,794	3,128	3,755	4,977	1.08%
Salem/Keizer UGB <sup>2</sup>	146,560	185,796	201,391	261,484	1.12%
St. Paul	322	352	410	556	1.34%
Scotts Mills	286	316	300	581	2.04%
Silverton	5,932	7,610	9,205	14,418	1.92%
Stayton	5,029	6,829	7,765	11,359	1.66%
Sublimity	1,487	2,139	2,255	3,200	1.53%
Turner	1,266	1,175	1,690	3,664	3.15%
Woodburn	13,535	20,191	22,875	37,216	2.04%
Unincorporated	42,758	45,023	47,041	47,394	0.19%

<sup>1</sup> Forecast population

<sup>2</sup> Marion County portion only. Estimates for the entire UGB of the following cities are provided for 2030: Gates, 550; Idanha, 279; Mill City, 1,792.

Sources: 1990 and 2000, U.S. Census Bureau; September 2008 Portland State University Population Research Center *Population Forecasts for Marion County, Its Cities and Unincorporated Area 2010 – 2030*.

				Medium	49,486	1.48%
				High	57,481	2.16%
				Low	152,562	0.74%
Salem <sup>2</sup>	95,667	119,373	129,830	Medium	165,824	1.09%
				High	179,586	1.42%
				Low	11,723	1.18%
Silverton	5,932	7,610	9,205	Medium	13,052	1.57%
				High	14,502	1.96%
				Low	10,053	1.15%
Stayton	5,029	6,829	7,765	Medium	11,359	1.66%
				High	12,721	2.13%
				Low	34,272	1.69%
Woodburn	13,535	20,191	22,875	Medium	37,216	2.04%
				High	41,718	2.53%

<sup>1</sup> Population range under three growth scenarios.

<sup>2</sup> Marion County portion only.

Sources: 1990 and 2000, U.S. Census Bureau; September 2008 Portland State University Population Research Center *Population Forecasts for Marion County, Its Cities and Unincorporated Area 2010–2030*.

Although projections were not developed for Polk County, scenarios for the Salem and Keizer Urban Growth Boundary were developed, which includes portions of Salem in Polk County and unincorporated areas of Salem and Keizer in both Marion and Polk Counties. These projections are presented in Table No. 24.

**Table No. 24**  
**Population Ranges Components of the Salem/Keizer Urban Growth Boundary**

Jurisdiction	1990	2000	2005	Range	2030 <sup>1</sup>	aagr 2010 – 2030
Salem/Keizer Urban Growth Boundary	159,677	203,966	217,284	Low	275,449	0.9%
				Medium	299,980	1.2%
				High	324,929	1.6%
Salem	108,784	137,543	147,250	Low	187,905	0.9%
				Medium	204,320	1.3%
				High	221,257	1.6%

Keizer	21,768	31,890	34,735	Low	41,491	0.7%
				Medium	49,486	1.5%
				High	57,481	2.2%
UGB <sup>2</sup>	29,125	34,533	35,299	Low	46,053	0.9%
				Medium	48,705	1.1%
				High	52,903	1.5%

<sup>1</sup> Population range under three growth scenarios

<sup>2</sup> Area inside UGB and outside city limits of Salem and Keizer in Marion and Polk Counties.

Sources: 1990 and 2000, U.S. Census Bureau; September 2008 Portland State University Population Research Center *Population Forecasts for Marion County, Its Cities and Unincorporated Area 2010 – 2030*.

**Urban Population**

Projection of urban area population was made based upon the urban growth programs of each city in Marion County and the overall land use goals and policies of the State and County. Each community's growth potential was analyzed using past growth trends and expected growth pressures in the future. Each community was consulted in developing these projections to coordinate city-County growth plans. These projections will help give perspective to the development pattern of Marion County by indicating the relationships among population centers. They will also provide guidance in updating of urban growth boundaries for each city. [Ord. 1291 § IV (Exh. B), 2009.]



**Polk County**

**Transportation Systems  
Plan**

**December 2009**



**Table 1**  
**Population Projections**  
**Polk County and Cities within Polk County**  
**2008 - 2030**

Location	2008	2010	2015	2020	2025	2030	Percent of Total 2008	Percent of Total 2030	Percent Change 2008-2030	AAGR 1996-2020
Polk County	68,235	72,845	83,338	95,594	107,118	117,557	100%	100%	72%	2.50%
Dallas	15,360	16,706	21,022	25,216	28,957	31,154	22.5%	26.5%	103%	3.26%
Falls City	965	983	1,083	1,195	1,285	1,352	1.4%	1.2%	40%	1.50%
Independence	8,030	8,588	9,859	11,319	12,995	14,919	12.8%	12.7%	86%	2.80%
Monmouth	9,565	10,069	11,448	13,015	14,798	16,824	14.0%	14.3%	76%	2.60%
Salem (Polk County Portion)	22,477	24,406	26,925	30,892	34,515	38,496	32.9%	32.8%	71%	2.50%
Willamina (Polk County Portion)	720	801	917	1,052	1,178	1,293	1.1%	1.1%	80%	2.60%
Unincorporated	11,118	11,291	12,084	12,905	13,390	13,519	16.3%	11.5%	22%	0.90%

*Source: Population estimates for 2008 were developed by the Oregon Center for Population Research and Census, 2008.*

- Dallas: projection is the remainder after the other cities had been projected and was acceptable to the cities, and after the unincorporated Polk County portion had been determined.
- Falls City: projection decreases from 1.4% of county total in 2008 to 1.35% in 2010, 1.30% in 2015, 1.25% in 2020, 1.20% in 2025 to 1.15% in 2030.
- Independence: projection uses the 2.8%/year from the city's 2008 comprehensive plan update and UGB expansion.
- Monmouth: projection is based on the city's request for 2.6%/year.
- West Salem: projection includes only the portion of the city in Polk County and is from Marion County's September 2008 draft projections, medium projection (p. 52) for Marion County and all the cities in Marion County, including west Salem.
- Willamina: projection includes only the portion of the city in Polk County. The projection slightly increases the city's 1.06% share of the county's total population in 2008 to 1.1% out to 2030.
- Unincorporated Polk County: projection is for those areas outside city limits. The projection decreases the unincorporated portion from 16.3% in 2008 to 15.5% in 2010 and 1% thereafter every 5-years.

In 2008 and 2009, Marion County contracted with the Oregon Center for Population Research and Census (CPRC) to produce population projections to 2030 for Marion County and the cities in the county. Marion County was scheduled to adopt their coordinated projection in 2009.

Polk County recognizes that planning is a dynamic process. While the population projections shown in **Table 1** constitute the county's obligation under state statute to establish such projections, these figures only represent the best estimates available at this time. The numbers are not static, but are subject to change as new information becomes available.

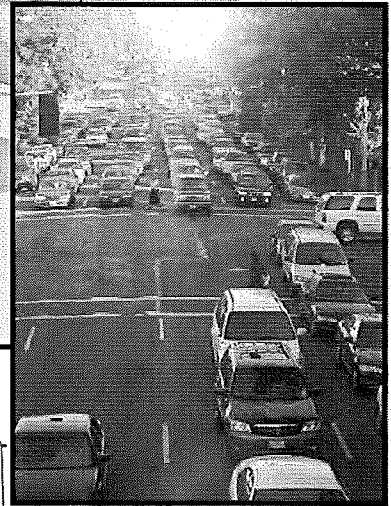
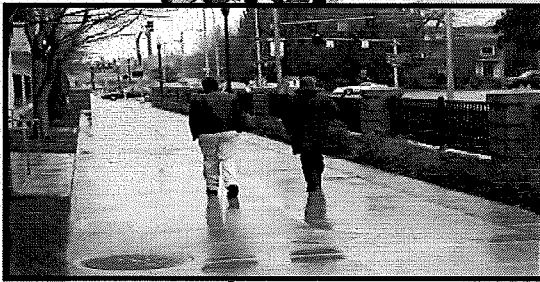
Polk County recognizes its obligation to maintain such forecasts in the future and that this obligation requires ongoing coordination with both the state and the cities in the county. Polk

# SKATS 2015—2035

## Regional Transportation Systems Plan

Amended by the SKATS Policy Committee on  
June 28, 2016

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As a basis for the forecast work, the housing and land use inventory in SKATS' Geographic Information System (GIS) was updated to reflect 2010 conditions. This update was based on building permits issued, assessor records, aerial photos, building footprints, and current planning projects in development. The inventory identified current uses, vacant land, property that may subdivide or partition, and potential redevelopment sites based on criteria determined by the subcommittee. The same criteria for identifying vacant land, land partitions, and subdivisions was applied to both Salem and Keizer and is described later in this chapter.

The forecasts for SKATS by jurisdictions are illustrated in Table A-8. Figures for the years 2000 and 2010 are from the decennial censuses. The forecasts for Keizer and Salem are discussed in greater detail later in this chapter. The historical and projected growth of only the Salem-Keizer UGB is illustrated in Figure A-4.

The density and development assumptions that were used to calculate persons per household and housing units per acre are listed in Table A-9. The housing density values were taken from the Salem-Keizer Regional Housing Needs Analysis (HNA) completed in 2011, which were derived from historical data as part of the HNA project. The persons per household numbers were derived from 2007-2011 American Community Survey data. The criteria for partitions, subdivisions, and redevelopment are the same used in determining the buildable land inventory of the Regional HNA with subsequent build out at the densities listed below.

Table A-9, Applied Definitions and Assumptions

Housing Density, Units per Gross Acre

	Keizer	Salem
Single Family	5.12	5.04
Duplex	8.00	7.12
Multi-Family	13.28	17.04

Densities from the Regional HNA for Keizer and Salem: (Table 3-7)

Persons per household:

2.57	Single Family
2.41	Multi-Family (2 to 4 units)
2.01	Multi-Family (5 or more units)

Densities derived from 2007-2011 ACS data, Tables B25033 and B25024

Definitions for Partitions, Subdivisions, and Redevelopment

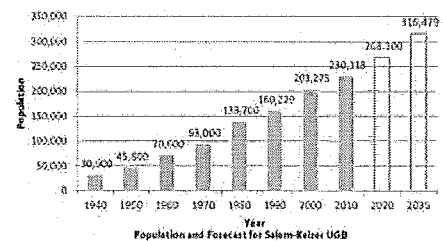
Definition	Category	Unit/Density
17,000 to 21,780 square feet	partition	1 new unit
21,780 to 43,560 square feet	partition	2 new units
Lots greater than 1 acre, deduct 1/4 acre for existing dwelling, the balance is considered vacant.	underutilized	5.12 or 5.04 units/acre
Current single family use on multi-family land, larger than 1/2 acre in size, existing unit subtracted to avoid over counting.	redevelopment	13.28 or 17.04 units/acre

Table A-8  
UGB and SKATS Population Forecast, 2010 to 2035

Area	2000	2010	2035
Keizer UGB	32,205	36,478	42,577
Salem UGB	171,072	193,640	273,901
East Salem	151,189	167,499	230,138
West Salem	19,883	26,141	43,763
Total Salem-Keizer UGB	203,275	230,118	316,479
Turner UGB	1,189	1,854	3,865
Remaining SKATS areas*	10,109	11,619	12,461
Total SKATS population	214,583	243,591	332,806

\*2000 SKATS boundaries smaller than 2010 SKATS area  
2000 and 2010 figures are from the decennial census

Figure A-4  
Salem-Keizer UGB Population Growth and Forecast, 1940-2035





# Salem Transportation System Plan

*Providing Mobility for a New Century*

Adopted August 24, 1998

Amended February 14, 2000

Amended November 5, 2007

Amended May 14, 2001

Amended April 26, 2010

Amended January 25, 2005

Amended December 10, 2012

Amended March 28, 2005

Amended May 27, 2014

Amended July 9, 2007

Amended February 8, 2016



The Council depends on several citizen boards and commissions to advise them on particular issues. The two commissions most related to transportation issues are the Salem Planning Commission and the Citizens Advisory Traffic Commission.

## Population and Employment

Formulating a transportation plan for Salem requires determining the needs of our community. Two key components in determining needs are trends in population and employment growth. Identifying the number of people living in the Salem area coupled with the opportunities for employment provides us a picture of what kind of travel demand the transportation system will experience. Using forecasting techniques, population and employment data can be projected into the future to determine what kind of travel demand the community may face into the next century.

The estimates and forecasts used to project traffic for the *Salem Transportation System Plan* are for the entire Salem-Keizer Transportation Study Area (SKATS). This covers an area slightly beyond the Salem-Keizer Urban Growth Boundary (UGB). Although politically separate from Keizer, Turner, and the urban portions of unincorporated Marion and Polk Counties, our community's travel demand is not based solely on those living and working within Salem's city limits, but within the entire region. Many people living outside the city limits choose to work or shop in Salem, thus creating travel demand for our community. The statistics that are presented below are for several different geographic areas. Some are for the City of Salem, some for the Salem-Keizer UGB (see Map 1-1), some for the SKATS area, and some for the Salem-Keizer Metropolitan Statistical Area or MSA (Marion and Polk Counties).

A detailed discussion of the population and employment trends, forecasts, and methodologies used for the region is included in the *Regional Transportation Systems Plan, 2015-2035*. For the purposes of the *Salem Transportation System Plan*, population and employment forecasts are included below.<sup>1</sup>

Salem-Keizer UGB Population Forecast				
	2000	2010	2015	2035
Salem portion UGB	171,072	193,640	199,030	273,902
East Salem	151,189	167,499	171,394	230,138
West Salem	19,883	26,141	27,636	43,763
Keizer portion UGB	32,203	36,478	37,086	42,577
Total UGB	203,275	230,118	236,116	316,479

These estimates were developed by SKATS with input from local jurisdictions. They are consistent with the most recently adopted coordinated population projections by Marion and Polk Counties.

## Land Use Framework

Salem-Keizer UGB Employment Forecast			
	2010	2035	Annual Percent Growth
Salem portion UGB	94,894	130,594	1.50%
Keizer portion UGB	5,403	8,209	2.08%
Total UGB	100,297	138,803	1.54%

The Salem Urban Area, encompassing the city limits and the area within the Urban Growth Boundary that will someday become Salem, comprises approximately 61 square miles. The *Salem Area Comprehensive Plan* was first adopted in 1973, with the latest significant revisions occurring in 1977. The *Salem Transportation System Plan* bases its planned investments on the land

use framework established in the Comprehensive Plan.

<sup>1</sup> These forecasts are intended only for the purposes of transportation planning and do not replace forecasts adopted for the purpose of analyzing land needed for housing and employment.

City of Salem Public Works Department  
Case File No. : CA 16-04

My written testimony including attachments for  
Hearing dated October 12, 2016  
From Loreen Wells  
2390 Liberty St. NE  
Salem

Subject: Proposed Amendments to the Salem Keizer Urban Growth Boundary, Salem Transportation System Plan and a Proposed Exception to Statewide Planning Goal 15 (Willamette River Greenway) to Allow for the Proposed Location of a New Bridge Across the Willamette River

To the Members of Salem Planning Commission, Salem Public Works Dept and whoever else is relevant to this discussion:

Well, here we are again. I am not able to come to this meeting for health reasons but this letter with attachments is my testimony. This is for the October 12 hearing on your proposed changes to the UGB for your fantasy bridge. Give it up already. This bridge has been on Salem's official agenda for 10 years. Or 40 years, if you listen to Mayor-elect Bennett. If this bridge were urgent it would already be built. Traffic flow has been flat or decreasing for years. Easier and much less expensive fixes to our existing bridges are available. Those were never even discussed.

There is wide spread public opposition to this bridge for those who know about it. It appears there have been concerted efforts on the part of this body to keep the public from knowing anything about this bridge or its planning. Now after a year and a half of underground planning, there is a big rush to get this bridge put into the City's Transportation Plan. It's not an emergency. If we really need this bridge and there is the means to get it done, the incoming Council could get it done just as well as our current Council. The incoming Councilors campaigned against the bridge for the most part, and won most of the new seats by large margins. I think they are the reason for rushing this plan through. This is an effort to cement this bridge in place, fix it in stone so it can't be changed, regardless of what anyone else thinks or wants or how the world changes. I'd like to know who really wants it and why.

The arguments of congestion don't hold up. We do not cross the bridges every day as some do for jobs, but we have never ever seen what we would consider real congestion. Slowdowns at times, added 5 minutes or even 30 minutes to commute, is not congestion. Try Portland traffic in or out of rush hour. That's congestion. Younger people are opting not to get driver's licenses or cars. Fewer driver's licenses and fewer cars means less traffic, not more. This bridge does nothing whatsoever for those younger people who do not drive.

There still is no viable funding plan. There is no money. There is no hope of money in the foreseeable future. A viable payment plan is supposed to be part of the EIS. not "we'll figure out what to do when we feel like it". Who in their right mind buys a house without first figuring out how to pay for that house or any house? Maybe if for you money is irrelevant? Money is most certainly relevant for giant public projects. BEFORE you start. Isn't it standrd to look for a house that fits one's budget? Putting the bridge in Salem's Transportation Plan will not get it done any faster. All that would do is to install "the cloud" over many properties. "The cloud" diminishes what an owner can do with his or her property. It also devalues all such property. Obvious and urgent public needs arising after this plan is installed will be more difficult to accomplish. This is true whether or not the bridge is ever built One gentleman said

something like his kids will be able to add what they feel needs to be done after 30 years. Who knows what we will be like in 30 years? In the meantime, we would be committed to this fantasy bridge.

The "Salem Alternative" plan Council voted in was supposed to be a smaller, local style bridge. It no longer looks remotely like the shape and form Council was led to believe it would be. When it surfaced after the vote a few "minor" changes were made to the drawings and construction choices. It is no longer the bridge of that Council vote. Every time we see this bridge again, it's different than it was the last time we saw it. Every time we see a new map the map gets worse for those who live in the trajectory of the bridge. That trajectory changes every new map we see. More houses and businesses lost, more home and business owners hurt every new map.

On the east side of the river, Highland is a compact neighborhood of smaller houses. It is walkable. No other Salem neighborhoods I know fits that description. Might be some, but if there are, I don't know about them. Many of our houses here do not have garages. As a result we know our neighbors. We see our neighbors regularly. There is a regular lament from the City on the lack of affordable housing. Highland has affordable housing. It would cost considerably less to keep the housing that's already here, or to upgrade, compared to new construction. Affordable housing already here would be gone with this plan. Not coming back either if cemented over. The City has been tearing down much of the affordable housing that used to exist here. Tearing down more parts of Highland would add to that housing deficit.

I-205 was once planned to come through here on approximately the same trajectory as you propose for this bridge. Houses were torn down, foundations, walkways and plantings left behind when that project was blocked by local citizens. Those remnants were here when I moved to Highland in 1976. Now a number of those remnants have been built on again, the area has been recovering. Newer houses going up. New businesses going in. Older houses are being nicely redone and are inhabited by families with younger children. This plan would destroy that process, that housing and businesses. Doesn't anybody there care, or is it just money that talks?

The last map I saw would split this part of Highland. Much of it would be gone. What's left would be impossible to navigate on foot. It would be difficult for the Highland residents who do have cars to access this proposed construction. Residents here who walk to Fred Meyer for groceries will not be able to do that without courting suicide. Salem Parkway already makes that trip extremely difficult and dangerous. Housing will be devalued, as would other property. Businesses that serve this area would be gone. Do you want to turn this established neighborhood into an instant slum? Your actions point that direction.

I am thankful that Councilors Tom Anderson and Diana Dickey recognize all this. They voted no on supporting this bridge for many of the same reasons I do not support it. If you have any conscience aside from your wallet you will vote no on this railroad job. Rushing projects as big as this one would make for big mistakes.

Aside from these considerations, your request to change the Urban Growth Boundary appears to violate the spirit and the letter of the Greenway Act. I attach relevant portions from the Salem Greenway Plan. That plan was to restore and enhance the river and its uses for the public. That plan requires habitat protection and care for wildlife and native vegetation as well as humans. The Greenway was designed to make the river more accessible for recreation, reduce noise, offer restful views, and support creatures native to our environment. Corvallis and Portland have done exactly that for the public. Major high speed traffic overhead here would certainly detract from those aims. How could the public even get to

the river? Not to mention the heron rookery would be demolished. Pilings will have to be driven into the river bottom. Many of them, according to your latest drawings. The river flow will be disturbed. Flooding could increase, river banks eroded, river bottom damaged. The bridge would come down in a major earthquake. What happens when the gravel company closes and leaves deep holes in the river bottom. Does your plan take that into account? No. The pretty little bridge shown to get votes for building the "Salem Alternative" is a fantasy. Not going to happen. Instead you want to give us an ugly, giant, freeway bridge we do not need. That shouldn't happen either. At one point I saw Mr. Fernandez promoting islands of sorts on the bridge surface with amenities for walkers. Who in their right mind would walk across his and your proffered bridge?

Have some consideration for your fellow humans and the planet, why don't you?

Sincerely,  
Loreen Wells  
2390 Liberty St. NE

Attachments include:

1. Relevant portions of the Salem Greenway plan
2. Notes from my previous in person testimony



Attachment #1

City of Salem Public Works Department  
Case File No. : CA 16-04  
Testimony for hearing October 12, 2016

From Loreen Wells  
Liberty and Hickory  
Salem, Oregon

Subject: Proposed Amendments to the Salem Keizer Urban Growth Boundary, Salem Transportation System Plan and a Proposed Exception to Statewide Planning Goal. 15 (Willamette River Greenway) to Allow for the Proposed Location of a New Bridge Across the Willamette River

To the Members of Salem Planning Commission, Salem Public Works Dept and whoever else is concerned the following is additional written testimony I present for consideration at the Oct 12, 2016 hearing. Not much here that has been taken into consideration while developing the current bridge plan:

Excerpts from the **WILLAMETTE RIVER GREENWAY PLAN**  
**CITY OF SALEM**  
**September 10, 1979**

In 1979 Oregon enacted the Willamette River Greenway. Per the Willamette River Greenway Plan, City of Salem, September 10, 1979 the plan's stated goal is "to protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River."

"The Salem Greenway Plan is a design plan and administrative review procedure that must be adopted and approved by DOT and LCDC. Any land owner located within the Greenway boundaries to change or intensify the use of his property must, before taking any action, apply for a Conditional Use Permit. The Salem Planning Commission will hold a Public Hearing on the permit.

The Greenway Plan is to be implemented through Chapter 120 of Salem Revised Statutes. The following segments are considered elements of the Salem Greenway Plan

POLICIES to achieve the above stated goal above are listed as:

1. Reglaltions (sic) shall be adopted to control the use of land and the intensity of uses within the Willamette River Greenway Boundary
2. Riparian vegetation and wild life within the Greenway Boundary shall be conserved. Conservation shall include protecting and managing riverbanks, sloughs, wildlife, and vegetation.
3. Scenic easements shall be used where practical to preserve and enhance the character of the river within the Greenway Boundary.
4. Where private property is adjacent to public use areas, measures shall be taken to minimize disturbance to the private property.
5. Development and redevelopment within the Greenway Boundary should include provision for public access to and along the river.
6. Existing parks within the Greenway Boundary shall be preserved and maintained. Additional sites for

ATTACHMENT 1  
CASE FILE NO: CA 04  
P. 2

recreation and scenic views and access to the Willamette River should be acquired.

7. New development and changes of land uses which are compatible with the Greenway concept as defined in the State Land Use Goal may be permitted along the Willamette River.

8. The review of proposed land use changes shall include the establishment of an appropriate set back from the Willamette River.

9. Aggregate extraction may be permitted within the river channel and on lands adjacent, when determined to be compatible with the purpose of the Greenway. Proposed extraction activities shall be designed to minimize the adverse effects of water quality, fish and wildlife, vegetation, bank stabilization, stream flow, visual quality, noise and potential land use.

Attachment #2

City of Salem Public Works Department  
Case File No. : CA 16-04  
Hearing dated October 12, 2016

Subject: Proposed Amendments to the Salem Keizer Urban Growth Boundary, Salem Transportation System Plan and a Proposed Exception to Statewide Planning Goal. 15 (Willamette River Greenway) to Allow for the Proposed Location of a New Bridge Across the Willamette River

To the Members of Salem Planning Commission, Salem Public Works Dept and whoever else is relevant to this discussion, these are notes from my August 8, 2016, testimony in person to Council. I wish to add these notes to my testimony for the October 12, 2016, hearing.

My name is Loreen Wells

I have lived on the corner of Liberty and Hickory for 40 years. Our historic house is over 100 years old. We are in the bulls eye of this proposed bridge. We have been jerked around for 10 years now by ODOT and the City of Salem. We feel like we have targets painted on our foreheads. The shape of that target has morphed over the years, but like a zombie it keeps coming back.

I have been to every ODOT public information meeting on this subject since 2006. Engineers there told me the plan would take 5 feet off both street sides of our property. We would have a freeway right outside our front door as well as our north side windows. Our house would be unlivable. What is barely two lanes on Hickory would become freeway off ramp. Getting to Freddy's is already difficult for foot traffic. The proposed bridge would cut us off almost completely.

We went to Council meetings where all options other than the most extreme 4D were dismissed out of hand. A new option called the Salem Alternative was introduced and voted in by Council. It was supposed to be more a local bridge. The next time we saw that Alternative, it bore no resemblance to the one Council voted on. Instead it became essentially 4D by another name. Considerable public input about the bridge was completely ignored, or forbidden altogether.

Last year there was no public information about the bridge. Now there is a big rush to get it done. Why? Is there an emergency? I can't see how.

New neighbors with small children have been moving in around us, putting a lot of money, labor and energy into improving their houses. New businesses built here. Having the prospect of this bridge would permanently damage all of us. Councilor Dickey, three years ago you spoke of the damage that would result from installing "the cloud" over us. This is that cloud. Do you really want to do that to your constituents?

P2. CASE NO: CA , 04  
ATTACHMENT 2

Why do you keep doing this to us? There is no money now or in the foreseeable future. There has never been any remotely viable funding plan. This bridge is unlikely to ever be built. Putting it into the permanent plan is outrageous. Where is your humanity?

Submitted again here for the hearing October 12, 2016  
Loreen Wells



# Oregon

Kate Brown, Governor

Department of Land Conservation and Development

Community Services Division

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: (503) 373-0050

Fax: (503) 378-5518

[www.oregon.gov/LCD](http://www.oregon.gov/LCD)



October 12, 2016

Salem City Council  
Polk County Board of Commissioners  
Keizer City Council  
Marion County Board of Commissioners

c/o City of Salem Public Works Department  
555 Liberty St SE / Room 325  
Salem, OR 97301

***RE: Salem River Crossing (Salem File No. CA16-04; DLCD File No. 016-16)***

**SUBMITTED VIA EMAIL**

Thank you for the opportunity to comment on the joint urban growth boundary (UGB) expansion and associated plan amendments to accommodate the Salem River Crossing (SRC), a new bridge across the Willamette River.

The department previously commented, in a letter dated September 27, on the proposed Goal 15 exception and related comprehensive plan amendments. This letter provides review and comments on the following findings submitted to us on September 26, 2016:

1. Proposed amendments to the Salem-Keizer UGB to be adopted by the Salem, Keizer, Polk County and Marion County.
2. Comprehensive plan and transportation system plan (TSP) amendments to be adopted by Salem and Polk County.

The findings must demonstrate compliance with statewide planning goals, administrative rules, and statutes, which are reviewed individually below. We understand that the proposal is based on the transportation need for an additional bridge crossing of the Willamette River and related transportation improvements in the 20-year planning horizon (2015-2035). No land is being included for employment, housing or other urban land needs.

### **Population Forecast**

The UGB amendment is based on the 20-year population forecast for the Salem-Keizer UGB included in the adopted 2015-2035 Regional Transportation System Plan (2035 RTSP) and the acknowledged Salem TSP. Table 8 from the RTSP, depicted below, shows the population forecast.

**TABLE 8**  
*Salem-Keizer Urban Growth Boundary Population Forecast*

	2000	2010	2015	2035
Salem portion of UGB	171,072	193,640	199,030	273,902
East Salem	151,189	167,499	171,394	230,138
West Salem	19,883	26,141	27,636	43,763
Keizer portion of UGB	32,203	36,478	37,086	42,577
Total UGB	203,275	230,118	236,116	316,479

Sources: SKATS Regional Transportation System Plan (2015) and Salem Transportation System Plan.

For the purposes of a UGB amendment, the population forecast used, if less than 10 years old, must be an adopted county forecast or, after June 2017, the adopted Portland State University forecast for cities within Marion and Polk counties (*see Oregon Administrative Rules (OAR) 660-032-0040*). While the city is justified in using an updated forecast, the 2009 Marion and Polk County forecast must be the basis for the forecast the UGB amendment relies upon and therefore the findings should refer to it and compare the extension of that forecast to the numbers in Table 8. We understand the city will include the appendix containing this information in the final record, but it was not submitted with the draft findings.

### **Goal 10 Housing Multifamily Units Displaced**

All of the build alternatives evaluated in the SRC project draft environmental impact statement identify multifamily residential units displaced, with estimated displacement impacts ranging from 30 to 120 residential units. As documented in Figure 4.2-1 of the *Right-of-Way Technical Report Addendum* (Universal Field Services, Inc., 2016), an estimated 45 to 50 residential units would be displaced with the preferred alternative, primarily west of the Willamette River.

Salem City Council advocated for the preferred alternative in part because it reduced residential displacement impacts relative to the initial alternative (4D, with 85 to 95 residential unit displacements) recommended by the oversight team. On page 240 of the submittal, the recently “accepted” Salem Housing Needs Analysis is mentioned and the city council concludes that the existing UGB includes sufficient buildable land to meet Salem’s forecast housing needs over the 2015-2035 planning horizon. However, since this document is not yet adopted and acknowledged, the findings should reflect this fact. The city’s discussion of the housing impact of this proposal must be based upon acknowledged provisions of the Salem Comprehensive Plan.

The city is required to identify “efficiency measures” to accommodate the displacement of needed multifamily units with the preferred alternative or make findings that this need can be met elsewhere within the existing UGB. In conclusion, the consolidated plan amendments are not consistent with Goal 10 or OAR chapter 660, division 8.

### **Goal 12 and Transportation Planning Rules**

Goal 12 and the Transportation Planning Rules (OAR chapter 660, division 12) apply to the Salem TSP and UGB amendments, so the comments below apply to both of these actions.

#### ***Transportation Need***

The findings for transportation need address some of the elements of Oregon Administrative Rules (OAR) 660-012-0030, but the findings are missing some key references.

OAR 660-012-0030(1) requires that the “TSP shall identify transportation needs ... including: (a) State, regional, and local transportation needs.” OAR 660-012-0015(3) requires that local TSPs must be “consistent with regional TSPs and adopted elements of the state TSP.” The findings (Section 3.1.3.1, page 80) note that the Oregon Highway Plan (OHP) does not identify a need for an improved Willamette River crossing in Salem. The findings include projections of future traffic volumes that would exceed the mobility targets adopted in the Policy 1F of the OHP. In response, the findings say that the “The State proposes to adopt Alternative Mobility Targets.” This implies that consistency with the state plan will be achieved by amending the standards within the OHP, rather than by adding a project to the state plans.

The findings in this section do not include OHP Policy 1G, which calls for improving the efficiency of, or adding capacity to, the existing highway system before adding new facilities. The findings include a cross-reference stating that “consistency with statewide transportation plans is provided in Section 4.2.4.” State transportation plans are actually addressed in Section 4.2.5 (page 168). OHP Policy 1G is included in Section 4.2.5.2 (page 172); however, this section does not contain any findings, and points back to “Section 3.X.” With this circular cross-reference, the findings do not address Policy 1G.

The findings for OAR 660-012-0030(3) include a discussion of consistency with population and employment forecasts, and a complete background of the city’s efforts to plan for increasing transportation choices and reducing reliance on the automobile. See above for a detailed discussion of consistency with the acknowledged population forecast in order to meet the requirement of OAR 660-012-0030(3)(a).

OAR 660-012-0030(4) provides, “In MPO areas, calculation of local and regional transportation needs shall also be based upon accomplishment of the requirement in OAR 660-012-0035(4) to reduce reliance on the automobile.” OAR 660-012-0035 requires that “local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reduce reliance on the automobile.” The findings (Section 3.1.3.1, pages 84-85) describe existing spending on various projects at the MPO level to make the general point that funding is being provided for projects that could increase transportation choices. The findings do not analyze whether the need that has been identified for this project is based on the locally adopted standards.

***Selection of Transportation Alternatives (OAR 660-012-0035)***

The findings address some sections of OAR 660-012-0035; however, key information is missing for some sections, and there are applicable sections of the rule that the findings do not address at all.

The findings for OAR 660-012-0035(4) are incomplete, and miss the actual requirement of the rule. The rule requires provides, “local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reduce reliance on the automobile.” The findings (Section 4.1.2.5, page 149) generally address whether the TSP amendment would “increase transportation choices and reduce reliance on the automobile,” but do not specifically address the locally adopted standards that must be used to measure progress. The findings list some general ways in which the proposed amendments might have the effect of increasing transportation choices as a secondary or indirect effect, but do not include any findings that the proposal was “designed” to achieve this outcome.

The findings do not address OAR 660-012-0035(7), which states:

... local governments shall evaluate progress in meeting benchmarks at each update of the regional transportation plan. Where benchmarks are not met, the relevant TSP shall be amended to include new or additional efforts adequate to meet the requirements of this rule.

Local governments in the region have not evaluated progress in meeting the adopted benchmarks. The findings do not include any analysis as to whether the TSP amendment would be adequate to meet the benchmarks.

***Significant Effect on the Transportation System (OAR 660-012-0060)***

There are no findings for OAR 660-012-0060. While findings for the proposed UGB amendment need not address 660-012-0060, findings are required for the proposed TSP amendments (changes to functional classifications), and for comprehensive plan map designation changes within the existing UGB (*see* OAR 660-024-0020(1)(d)).

**Reasonably Accommodating Needs within the UGB**

The findings (Section 3.1.4.1, pages 86-104) address whether the projected transportation needs could be reasonably accommodated on land already inside the UGB as required by OAR 660-024-0050(4). The findings include a brief discussion of alternatives studied other than the preferred alternative, a no-build alternative, and “Alternative 2A.” There is a detailed discussion of Alternative 2A. However evaluating a single alternative within the UGB may not be sufficient to “demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB” as required by OAR 660-024-0050(4). The findings should analyze whether the aspect that makes an alternative unreasonable is inherent to being within the UGB (and thus any alternative within the UGB would also be unreasonable) or whether the unreasonable aspect is specific to that alternative (and thus different alternatives within the UGB could be reasonable).



The department has previously provided advice on how to analyze the reasonableness of alternatives. The first step is to identify the factors that will be evaluated (for example: cost, traffic, congestion, residential dislocation). The second step is to select and justify thresholds (for example: 25 percent worse than the preferred alternative) that will determine whether an alternative is reasonable. The final step is to analyze a broad range of alternatives to determine whether any reasonable alternatives would accommodate the need within the UGB. The findings provide a large volume of information comparing two alternatives, but do not include a structured analysis of why they are reasonable or unreasonable.

The department understands that the draft environmental impact statement included additional alternatives that did not require a UGB amendment. The findings should make reference to these other alternatives and address why the alternatives are unreasonable.

### **Goal 14 Urban Growth Boundary Review**

The city's analysis of boundary alternatives generally complies with ORS 197A.310. However, the analysis of the four Goal 14 location factors shown in the table on Pages 127 and 128 is insufficient for three reasons:

- 1) The table itself does not contain information in several cells regarding the preferred alternative that can be used to compare this alternative to the others;
- 2) There is no narrative indicating which factors were used to find why the preferred alternative was chosen – no “weighing and balancing” as is required by Goal 14 and relevant case law; and
- 3) The analysis of location factor 4, regarding impacts to farm and forest activities, incorrectly compares the loss of farmland for each alternative (a quantitative measure) while location factor 4 requires an analysis of the compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary (a qualitative examination).

We recommend the city address the missing findings from Goal 14 location factors and submit that evidence into the record before taking any final action on this proposal.

### **Conclusion**

The draft proposal submitted is missing some important findings, and does not adequately address the required goals and administrative rules as summarized above. The draft also includes numerous incomplete cross-references (e.g. “as described in Section X”) which makes it difficult to find the information, or determine whether the information has been provided at all. We recommend the city address the concerns raised in this letter so that it can have a solid, defensible factual basis for this UGB expansion.

Please enter these comments into the record for the plan amendment and contact Angela Carnahan at (503) 934-0070 or [angela.carnahan@state.or.us](mailto:angela.carnahan@state.or.us) if you should have any questions regarding these comments.

Sincerely,

*Angela Lazarean Carnahan*

Angela Lazarean Carnahan  
Mid-Willamette Valley Regional Representative

cc: Amanda Punton, DLCD Natural Resources Specialist  
Bill Holmstrom, DLCD Transportation & Land Use Planning Coordinator  
Gordon Howard, DLCD Principal Urban Planner

October 12, 2016

City of Salem and City Council  
Polk County Commission  
City of Keizer and City Council  
Marion County Commission

Re: Salem Preferred Alternative Bridge

Honorable Assembled Officials:

Below are two comments we wish to enter into the voluminous record of the bridge project currently known as the Salem Preferred Alternative:

**OVERVIEW:** What tends to get lost in the overwhelming detail that has accumulated in this decade-long process is the sheer epic scope of the project and what it means to the character and identity of West Salem.

The Salem River Crossing in its current form would constitute a thorough makeover of West Salem, turning it into a giant intersection, allowing people to speed through to Portland or the coast (without leaving much economic benefit here). Our identity will be subsumed into a series of ramps and bridges. The proposed bridge and its related tendrils will come to dominate and define West Salem.

It takes imagination over and above the maps and graphics and descriptions to envision the changes. Wallace Marine Park will be severely and negatively impacted with a major road skirting its boundary, one or more ramps slicing around or into the Union St. Bridge path, and a flyover of massive proportions somewhere in the vicinity. We realize that earlier options, now rejected, would have been worse. But the current configuration (including the so-called 2<sup>nd</sup> St. extension) is bad enough to warrant dismissal.

Meanwhile, the Edgewater Commercial District, another defining element of West Salem, will be eviscerated, with scores of businesses replaced by a high speed road and ramp. The closing of the Rosemont exit off Rt. 22 will only add congestion to Wallace Rd. (countering one supposed goal of this project).

In addition a significant number of residences, some of recent vintage, will be eliminated north of Wallace Marine Park to make way for the new bridge and its connections.

To what end, all these changes? Allegedly, to improve “traffic flow.” A goal about which one can reasonably express skepticism. Is congestion-free commuting really going to be in our future if we build this bridge? Or will congestion just move to different locations? On this score, we don't think anyone is making any guarantees but there's a lot of wishful thinking that the proposed bridge is a traffic panacea which, realistically, we must understand it is not.

The proposed bridge is the type of project popular with cities in the 1950's and 60's which many of them came to regret (while still paying the tab).

**TOLLS.** Funding is the elephant in the room for this project. Funding is the huge missing piece, discussed only in general and speculative terms. But here is one nugget.

The Draft EIS states in the funding section: “Tolling is being explored as a way to pay for the project but it DOES NOT WORK IF ONLY ONE BRIDGE IS TOLLED. IF ONLY THE NEW BRIDGE IS TOLLED, MANY PEOPLE WOULD CHOOSE TO USE THE EXISTING (NON-TOLLED) BRIDGES INSTEAD OF THE NEW ONE. This would result in little improvement to congestion on the existing bridges. Since so many fewer people would use the new tolled bridge, not enough money would be generated to pay for it.” (Emphasis added.)

This statement implies that behavior can be modified through tolling. A toll on the two existing bridges, sooner rather than later and certainly before new construction, could have many positive results. It might make people think about their car trips, it might alter habits, ease congestion, and the revenue could be applied to bridge maintenance and/or public transit.

That concludes our comments, the least we can do as long-time residents of West Salem, in the face of a half-billion dollar project that we believe ought to be tabled indefinitely.

Sincerely,

Bob Coe & Merrily McCabe