1000 friends of Oregon

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October 12, 2016

Honorable Mayor Anna Peterson
Salem City Council
Salem Planning Commission
City of Salem
555 Liberty St SE
Salem, OR 97301

Honorable Mayor Cathy Clark
Keizer City Council
Keizer Planning Commission
City of Keizer
930 Chemawa Rd NE
Keizer, OR 97303

Marion County Commissioners
Marion County
555 Court St NE
Salem, OR 97301

Polk County Commissioners
Polk County
850 Main Street
Dallas, OR 97338

Re: Population forecast for proposed third bridge UGB expansion

Dear Mayors, Councilors and Commissioners:

1000 Friends of Oregon is a nonprofit, charitable organization dedicated to working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas. Please place these comments in the record for the proposed third bridge UGB expansion.

1000 Friends is a consistent advocate for realistic, fact-based land use and transportation planning. In Oregon, UGBs are based on the need to accommodate population and employment growth, including transportation needs such as bridges. At the third bridge hearings in early 2013, we expressed concern about the use of an outdated, inaccurate population forecast to derive the long-range traffic forecast that was a key justification for the project.

Since those 2013 hearings, significant changes to Oregon's population forecasting system have occurred, resulting in more accurate projections. New administrative rules were adopted in 2015, as well as changes to the Goal 14 rule; they are applicable to this proposal. As will be explained in detail below, the proposed Salem-Keizer UGB forecast violates these new rules; it assumes about 25% more growth than projected with the new rules.

<u>Salem-Keizer's proposed UGB forecast</u>

Table 9 on page 80 of the October 4, 2016 document, "Findings Report: Salem River Crossing Preferred Alternative," presents the "Salem-Keizer Urban Growth Boundary Population Forecast," which assumes a 2035 population of 316,479 people:

Table 9
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.

The accompanying text explains that this forecast is the basis of the proposed UGB expansion:

> "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 adopted and acknowledged Salem Transportation System Plan (Salem TSP)."
>
> "The population and employment forecasts were allocated to a parcel level for use in transportation modeling for the 2035 RTSP."
>
> "The population and employment forecasts developed for the 2035 RTSP and the Salem TSP have been used as the basis for updated travel demand modeling for the Preferred Alternative and provide evidence to support the 20-year transportation need for the proposed UGB amendment."
>
> "The proposal to expand the UGB by about 35 acres 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) to accommodate identified population growth over that planning horizon."

The text also explains that the 2015-2035 RTSP was adopted on May 24, 2015, and the Salem TSP was amended to incorporate the RTSP's forecast on February 8, 2016.

The new Division 32 rule

Traditionally, UGB forecasts have been provided by counties. The last such forecast for the Salem-Keizer UGB was adopted by Polk County and Marion County in 2009. In 2013, HB 2253 transferred population forecasting responsibilities from counties to Portland State's Population Research Center (PRC). New administrative rules for population forecasting were created: OAR 660, Division 32. These rules became effective on March 25, 2015.

In addition, the Goal 14 rule was amended to incorporate the new forecasting rules; OAR 660-024-0040(1) now explicitly requires that all UGB expansions be based on a population forecast that complies with Division 32:

> "The UGB must be based on the appropriate 20-year population forecast for the urban area as determined under Rules in OAR 660, div 32, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule."

The PRC will provide forecasts for roughly one-third of Oregon each year, on a rotating basis. Southern, Central and Eastern Oregon received forecasts in 2015 and 2016, but the cities in Marion and Polk Counties will not receive forecasts until June, 2017. Because this UGB proposal was initiated after the effective date of Division 32, but before the issuance of Salem-Keizer's first PRC forecast, special transition rules apply.

Division 32 stipulates that a local government initiating a UGB amendment before the PRC issues its first population forecast for the urban area must use an "interim forecast" that complies with OAR 660-032-0040. Relevant sections are reproduced below:

> ***660-032-0040***
>
> ***Interim Forecasts***
>
> *(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.*
>
> * * *
>
> *(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.*

(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.

* * *

(8) For purposes of this rule:

* * *

(d) "Current population of the planning area" for an urban area means 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.

A previously adopted forecast must pass both OAR 660-032-0040(1) tests before it can be used as an "interim forecast." Under subsection (1)(a), it must be less than 10 years old, and must have been adopted under former ORS 195.034 and 195.036. Under subsection (1)(b), it must have been adopted prior to March 25, 2015. Such a forecast exists for the Salem-Keizer UGB: the coordinated 2010-2030 forecast adopted on October 7, 2009, as Marion County Ordinance 1291.[1]

Ordinance 1291 adopted a report titled "Population Forecasts for Marion County, its Cities and Unincorporated Area 2010-2030." Forecast numbers for 2010 through 2030, in five-year increments, growth trends for each 5-year period, and the overall long term trend are all found on page 52 of the adopted report. They are reproduced below:

[1] The Marion County forecast encompasses the entire Salem-Keizer UGB, including the portion that lies in Polk County. The West Salem numbers were also adopted by Polk County as part of its 2008-2030 forecast. That Polk County forecast also qualifies as an interim forecast under OAR 660-032-0040(1). We treat the Marion and Polk forecasts for the Salem-Keizer UGB as a single forecast, even though they were adopted separately, because they were coordinated and are consistent with one another. In addition, as will be explained later, Division 32's methodology for preparing an extended forecast for the Salem-Keizer UGB requires the use of one forecast for the entire UGB.

MEDIUM Growth Scenario, Populations for Marion County, its Five Largest Cities, and the Salem-Keizer UGB

	Historical----------→			Forecast---------->				
AREA	**1990**	**2000**	**2005**	**2010**	**2015**	**2020**	**2025**	**2030**
MARION CO	228,516	284,834	302,135	323,266	345,077	368,364	388,827	410,431
KEIZER	21,768	31,890	34,735	36,892	39,424	42,129	44,476	46,955
SALEM (MarCo)	95,667	119,373	126,525	133,568	142,491	150,798	158,157	165,824
SALEM	108,784	137,543	147,250	157,974	169,416	181,690	192,672	204,320
SILVERTON	5,932	7,610	8,230	9,552	10,484	11,507	12,255	13,052
STAYTON	5,029	6,829	7,505	8,171	8,938	9,777	10,538	11,359
WOODBURN	13,535	20,191	22,110	24,866	27,872	31,243	34,099	37,216
SALEM-KEIZER UGB	159,677	203,966	217,284	233,864	250,246	267,780	283,422	299,980

Ave. Annual Growth Rate	**Historical----------→**		**Forecast---------->					
AREA	**1990-00**	**2000-05**	**2005-10**	**2010-15**	**2015-20**	**2020-25**	**2025-30**	**2010-2030**
MARION CO	2.2%	1.2%	1.4%	1.3%	1.3%	1.1%	1.1%	1.2%
KEIZER	3.8%	1.7%	1.2%	1.3%	1.3%	1.1%	1.1%	1.2%
SALEM (MarCo)	2.2%	1.2%	1.1%	1.3%	1.1%	1.0%	0.9%	1.1%
SALEM	2.3%	1.4%	1.4%	1.4%	1.4%	1.2%	1.2%	1.3%
SILVERTON	2.5%	1.6%	3.0%	1.9%	1.9%	1.3%	1.3%	1.6%
STAYTON	3.1%	1.9%	1.7%	1.8%	1.8%	1.5%	1.5%	1.6%
WOODBURN	4.0%	1.8%	2.3%	2.3%	2.3%	1.7%	1.7%	2.0%
SALEM-KEIZER UGB	2.4%	1.3%	1.5%	1.4%	1.4%	1.1%	1.1%	1.2%

Because Salem-Keizer's previously adopted forecast does not cover the entire 2015-2035 planning period for the third bridge UGB expansion, an extended forecast must be developed per the instructions in subsection (4) of the rule:

> "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 shown by the above table, the "long term growth trend" is the 1.2% annual growth rate for the 2010-2030 period. The "current population of the planning period" must be computed using the instructions in subsection (8)(d) of the rule. The attachment to this letter shows our calculation of the 2015 UGB population using the rule's methodology: 236,678 people. This is very close to the RTSP's 2015 estimate of 236,116 people.

According to OAR 660-032-0040(4), the extended forecast is prepared by applying the long term growth trend (1.2%) to the current UGB population (236,678 people), over a 20-year time period. The resulting forecast for 2035 is 300,447 people.[2] By comparison, the RTSP forecast that underpins the proposed UGB expansion predicts 316,479 people in 2035.

The below Table 1 summarizes the differences between the Division 32 interim forecast and the RTSP forecast. The RTSP forecast is over 16,000 people too high, and overestimates the UGB's 2015-2035 growth by over 25%.

[2] Calculation: 236,678 * 1.012 ^ 20

	2015 UGB Population	2035 UGB Forecast	2015-2035 Growth Rate	2010-2035 Overall Growth
Division 32 Forecast	236,678	300,447	1.2%	63,769
RTSP Forecast	236,116	316,479	1.5%	80,363

Table 1.

Effect of acknowledgement of Salem TSP

It might be suggested that despite the above-described problems, the RTSP's forecast could nevertheless be used for UGB purposes because it was adopted as part of Salem's acknowledged TSP. It can't be, for at least two reasons.

First, OAR 660-032-0040(1)(a) only allows the interim use of forecasts that were adopted "consistent with the requirements of ORS 195.034 and 195.036 as those sections were in effect immediately before July 1, 2013." The Salem TSP amendment did not create a forecast under either of those provisions. ORS 195.036 pertains to county-initiated forecasts. ORS 195.034 pertains to city-initiated forecasts, but such a forecast would have required co-adoption by Keizer, and the notification and involvement of Polk County, Marion County, and all other local governments within both counties.

Second, OAR 660-032-0040(1)(b) only allows the interim use of forecasts that were adopted prior to the effective date of Division 32, which is March 25, 2015. The Salem TSP amendment was adopted almost a year after that date.

Policy implications

The RTSP's 2035 forecast is significantly larger than the Division 32 forecast because it was derived by retaining the old 2030 forecast of 299,980 people, then increasing it by 5.5% percent to create a 2035 forecast of 316,479.[3] Since the actual 2015 population (about 236,000 people) is much less than the old forecast's prediction for 2015 (about 250,000 people), a significantly higher growth rate would be required to actually reach the old forecast's end-year prediction. As shown by the above Table 1, Salem-Keizer would have to grow at 1.5% per year to realize the RTSP's 2035 forecast, rather than the old forecast's 1.2% prediction.

By contrast, OAR 660-032-0040(4) requires that an entirely new forecast be created for Salem-Keizer by applying the old forecast's 1.2% overall growth trend to the *current* population. In this way, the fundamental prediction of the old forecast – that Salem-Keizer will grow at 1.2% per year – is preserved. The rule was deliberately written this way to blunt the effects of old forecasts that are inaccurate.

Because this UGB expansion proposal is based on the non-compliant RTSP forecast of a 1.5% growth rate, it cannot be approved as written. Under Division 32, it would be legally permissible to update the proposal using the 1.2% growth rate found in the old Marion County forecast.

[3] The 5.5% increase reflects the application of the 1.1% annual growth rate predicted by the Marion County forecast for 2025-2030, multiplied by five years to extend out from 2030 to 2035.

However, we urge you to wait for the new PRC forecasts that will be issued in the spring.

Based on the experiences of other counties, the new PRC forecast for Salem-Keizer could be substantially lower than 1.2%. For example, in 2008 and 2009, Polk, Marion and Lane Counties all commissioned, and subsequently adopted, countywide forecasts prepared by the same team of demographers. When the PRC re-forecast Lane County in 2015, the new countywide growth rate was only 76% as high as the 2009 forecast. Similar rollbacks have happened all over Oregon since the new PRC forecasts have been unveiled.

If those trends hold, the new Salem-Keizer forecast could be somewhere around 0.9%. That would be a substantial reduction, not just from the 1.5% RTSP forecast, but also from the 1.2% 2009 forecast. The traffic modeling outcomes could be significantly different.

It would be poor public policy and could result in wasteful investment of scarce public transportation dollars to knowingly use an incorrect, outdated forecast as the basis for planning and spending the public's money. Population forecasts are the cornerstone of all land use and traffic planning. If population forecasts are wrong, everything built upon them will also be wrong. When planning for major infrastructure such as the proposed third bridge, accurate forecasts are fundamental to ensuring outcomes are based on actual future traffic demands and revenue streams.

Sincerely,

Mia Nelson
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1000 Friends of Oregon
P.O. Box 51252
Eugene, OR 97405
541.520.3763

Attachment: Calculation of 2015 UGB population per OAR 660-032-0040(8)(d)

ATTACHMENT A

COMPUTE "CURRENT POPULATION" UNDER OAR 660-032-0040(8)(d):

2010 Salem-Keizer UGB pop. (from RSTP Table A-8)	230,118
2010 Salem Population (Census count from PSU)	154,637
2010 Keizer Population (Census count from PSU)	36,478
2010 Unincoporated Population (COMPUTED)	39,003
2015 Salem Population (PSU estimate)	160,690
2015 Keizer Population (PSU estimate)	36,985
2015 Unincorporated Population (carried forward)	39,003
2015 UGB Population (COMPUTED)	**236,678**

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

Area	2000	2010	2035
Keizer UGB	32,203	36,478	42,577
Salem UGB	171,072	193,640	273,902
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	1,199	1,854	3,865
Remaining SKATS areas*	10,109	11,619	12,461
Total SKATS population	214,583	243,591	332,806

*2000 SKATS boundary is smaller than 2010 SKATS area

2000 and 2010 figures are from the decennial census

2000 and 2010 Census Profile
Salem city

POPULATION	2000		2010		Change	
SEX AND AGE						
Total population	136,924	*100.0%*	154,637	*100.0%*	17,713	*12.9%*
Under 5 years	10,190	*7.4%*	11,407	*7.4%*	1,217	*11.9%*
5 to 9 years	9,620	*7.0%*	10,778	*7.0%*	1,158	*12.0%*
10 to 14 years	9,244	*6.8%*	10,346	*6.7%*	1,102	*11.9%*
15 to 19 years	10,159	*7.4%*	11,334	*7.3%*	1,175	*11.6%*
20 to 24 years	11,252	*8.2%*	11,686	*7.6%*	434	*3.9%*
25 to 29 years	10,608	*7.7%*	11,849	*7.7%*	1,241	*11.7%*
30 to 34 years	10,051	*7.3%*	10,897	*7.0%*	846	*8.4%*
35 to 39 years	10,238	*7.5%*	10,115	*6.5%*	-123	*-1.2%*
40 to 44 years	10,301	*7.5%*	9,918	*6.4%*	-383	*-3.7%*
45 to 49 years	9,813	*7.2%*	9,952	*6.4%*	139	*1.4%*
50 to 54 years	8,439	*6.2%*	10,212	*6.6%*	1,773	*21.0%*
55 to 59 years	5,679	*4.1%*	9,668	*6.3%*	3,989	*70.2%*
60 to 64 years	4,291	*3.1%*	7,987	*5.2%*	3,696	*86.1%*
65 to 69 years	3,746	*2.7%*	5,382	*3.5%*	1,636	*43.7%*
70 to 74 years	3,795	*2.8%*	3,952	*2.6%*	157	*4.1%*
75 to 79 years	3,838	*2.8%*	3,217	*2.1%*	-621	*-16.2%*
80 to 84 years	2,815	*2.1%*	2,837	*1.8%*	22	*0.8%*
85 years and over	2,845	*2.1%*	3,100	*2.0%*	255	*9.0%*
Median age (years)	33.6		34.5		0.9	
Under 18 years	34,819	*25.4%*	38,936	*25.2%*	4,117	*11.8%*
18 to 64 years	85,066	*62.1%*	97,213	*62.9%*	12,147	*14.3%*
65 years and over	17,039	*12.4%*	18,488	*12.0%*	1,449	*8.5%*
Male population	68,752	*100.0%*	77,115	*100.0%*	8,363	*12.2%*
Under 5 years	5,209	*7.6%*	5,917	*7.7%*	708	*13.6%*
5 to 9 years	4,910	*7.1%*	5,539	*7.2%*	629	*12.8%*
10 to 14 years	4,763	*6.9%*	5,261	*6.8%*	498	*10.5%*
15 to 19 years	5,198	*7.6%*	5,780	*7.5%*	582	*11.2%*
20 to 24 years	5,935	*8.6%*	5,998	*7.8%*	63	*1.1%*
25 to 29 years	5,875	*8.5%*	6,169	*8.0%*	294	*5.0%*
30 to 34 years	5,549	*8.1%*	5,748	*7.5%*	199	*3.6%*
35 to 39 years	5,520	*8.0%*	5,280	*6.8%*	-240	*-4.3%*
40 to 44 years	5,269	*7.7%*	5,208	*6.8%*	-61	*-1.2%*
45 to 49 years	4,931	*7.2%*	5,110	*6.6%*	179	*3.6%*
50 to 54 years	4,236	*6.2%*	4,980	*6.5%*	744	*17.6%*
55 to 59 years	2,754	*4.0%*	4,629	*6.0%*	1,875	*68.1%*
60 to 64 years	2,027	*2.9%*	3,832	*5.0%*	1,805	*89.0%*
65 to 69 years	1,625	*2.4%*	2,469	*3.2%*	844	*51.9%*
70 to 74 years	1,560	*2.3%*	1,752	*2.3%*	192	*12.3%*
75 to 79 years	1,497	*2.2%*	1,340	*1.7%*	-157	*-10.5%*
80 to 84 years	1,042	*1.5%*	1,105	*1.4%*	63	*6.0%*
85 years and over	852	*1.2%*	998	*1.3%*	146	*17.1%*

Sources: U.S. Census Bureau, 2010 Census, Summary File 1; 2000 Census, Summary File 1.
Tabulated by Population Research Center, Portland State University.

www.pdx.edu/prc

2000 and 2010 Census Profile
Keizer city

POPULATION	2000		2010		Change	
SEX AND AGE						
Total population	32,203	*100.0%*	36,478	*100.0%*	4,275	*13.3%*
Under 5 years	2,593	*8.1%*	2,586	*7.1%*	-7	*-0.3%*
5 to 9 years	2,509	*7.8%*	2,798	*7.7%*	289	*11.5%*
10 to 14 years	2,395	*7.4%*	2,868	*7.9%*	473	*19.7%*
15 to 19 years	2,199	*6.8%*	2,607	*7.1%*	408	*18.6%*
20 to 24 years	1,863	*5.8%*	2,058	*5.6%*	195	*10.5%*
25 to 29 years	2,371	*7.4%*	2,427	*6.7%*	56	*2.4%*
30 to 34 years	2,449	*7.6%*	2,545	*7.0%*	96	*3.9%*
35 to 39 years	2,436	*7.6%*	2,455	*6.7%*	19	*0.8%*
40 to 44 years	2,433	*7.6%*	2,262	*6.2%*	-171	*-7.0%*
45 to 49 years	2,279	*7.1%*	2,429	*6.7%*	150	*6.6%*
50 to 54 years	2,071	*6.4%*	2,399	*6.6%*	328	*15.8%*
55 to 59 years	1,538	*4.8%*	2,166	*5.9%*	628	*40.8%*
60 to 64 years	1,151	*3.6%*	2,011	*5.5%*	860	*74.7%*
65 to 69 years	1,015	*3.2%*	1,426	*3.9%*	411	*40.5%*
70 to 74 years	911	*2.8%*	1,042	*2.9%*	131	*14.4%*
75 to 79 years	862	*2.7%*	894	*2.5%*	32	*3.7%*
80 to 84 years	561	*1.7%*	697	*1.9%*	136	*24.2%*
85 years and over	567	*1.8%*	808	*2.2%*	241	*42.5%*
Median age (years)	34.4		35.7		1.3	
Under 18 years	8,930	*27.7%*	9,945	*27.3%*	1,015	*11.4%*
18 to 64 years	19,357	*60.1%*	21,666	*59.4%*	2,309	*11.9%*
65 years and over	3,916	*12.2%*	4,867	*13.3%*	951	*24.3%*
Male population	15,629	*100.0%*	17,496	*100.0%*	1,867	*11.9%*
Under 5 years	1,333	*8.5%*	1,326	*7.6%*	-7	*-0.5%*
5 to 9 years	1,251	*8.0%*	1,465	*8.4%*	214	*17.1%*
10 to 14 years	1,211	*7.7%*	1,504	*8.6%*	293	*24.2%*
15 to 19 years	1,104	*7.1%*	1,289	*7.4%*	185	*16.8%*
20 to 24 years	926	*5.9%*	1,000	*5.7%*	74	*8.0%*
25 to 29 years	1,188	*7.6%*	1,196	*6.8%*	8	*0.7%*
30 to 34 years	1,216	*7.8%*	1,265	*7.2%*	49	*4.0%*
35 to 39 years	1,225	*7.8%*	1,178	*6.7%*	-47	*-3.8%*
40 to 44 years	1,204	*7.7%*	1,043	*6.0%*	-161	*-13.4%*
45 to 49 years	1,097	*7.0%*	1,163	*6.6%*	66	*6.0%*
50 to 54 years	1,006	*6.4%*	1,143	*6.5%*	137	*13.6%*
55 to 59 years	728	*4.7%*	1,006	*5.7%*	278	*38.2%*
60 to 64 years	552	*3.5%*	934	*5.3%*	382	*69.2%*
65 to 69 years	455	*2.9%*	641	*3.7%*	186	*40.9%*
70 to 74 years	372	*2.4%*	470	*2.7%*	98	*26.3%*
75 to 79 years	373	*2.4%*	357	*2.0%*	-16	*-4.3%*
80 to 84 years	206	*1.3%*	260	*1.5%*	54	*26.2%*
85 years and over	182	*1.2%*	256	*1.5%*	74	*40.7%*

Sources: U.S. Census Bureau, 2010 Census, Summary File 1; 2000 Census, Summary File 1.
Tabulated by Population Research Center, Portland State University.

www.pdx.edu/prc

Incorporated City/Town	Certified Estimate July 1, 2015
Imbler	305
Independence	8,775
Ione	330
Irrigon	1,930
Island City	1,025
Jacksonville	2,880
Jefferson	3,165
John Day	1,735
Johnson City	565
Jordan Valley	175
Joseph	1,095
Junction City	5,870
Keizer	36,985
King City	3,425
Klamath Falls	21,580
La Grande	13,165
La Pine	1,670
Lafayette	3,905
Lake Oswego	37,300
Lakeside	1,705
Lakeview	2,300
Lebanon	15,740
Lexington	255
Lincoln City	8,485
Lonerock	20
Long Creek	195
Lostine	215
Lowell	1,065
Lyons	1,160
Madras	6,265
Malin	815
Manzanita	620
Maupin	425
Maywood Park	750
McMinnville	33,080
Medford	77,655
Merrill	840
Metolius	710
Mill City	1,855
Millersburg	1,620
Milton-Freewater	7,070
Milwaukie	20,505
Mitchell	130
Molalla	8,940
Monmouth	9,640
Monroe	620
Monument	130
Moro	325
Mosier	445
Mt. Angel	3,410
Mt. Vernon	525
Myrtle Creek	3,480
Myrtle Point	2,525
Nehalem	280
Newberg	22,900
Newport	10,165
North Bend	9,755
North Plains	2,015
North Powder	445
Nyssa	3,285
Oakland	940
Oakridge	3,240
Ontario	11,465
Oregon City	33,940
Paisley	245
Pendleton	16,845
Philomath	4,650
Phoenix	4,585
Pilot Rock	1,505
Port Orford	1,140
Portland	613,355
Powers	695
Prairie City	910
Prescott	55
Prineville	9,385
Rainier	1,905
Redmond	27,050
Reedsport	4,150
Richland	175
Riddle	1,185
Rivergrove	495
Rockaway Beach	1,335
Rogue River	2,175
Roseburg	22,500
Rufus	280
Salem	160,690
Sandy	10,395
Scappoose	6,745
Scio	850
Scotts Mills	365
Seaside	6,585
Seneca	215
Shady Cove	3,025
Shaniko	35
Sheridan	6,115
Sherwood	19,080
Siletz	1,235
Silverton	9,590
Sisters	2,280
Sodaville	325
Spray	160
Springfield	60,135
St. Helens	13,095
St. Paul	425
Stanfield	2,125
Stayton	7,725
Sublimity	2,755
Summerville	135
Sumpter	205
Sutherlin	7,975
Sweet Home	9,090
Talent	6,270
Tangent	1,200
The Dalles	14,515
Tigard	49,280
Tillamook	4,900
Toledo	3,490
Troutdale	16,020
Tualatin	26,590
Turner	1,920
Ukiah	245
Umatilla	7,060
Union	2,150
Unity	75
Vale	1,875
Veneta	4,700
Vernonia	2,065
Waldport	2,075
Wallowa	810
Warrenton	5,175
Wasco	420
Waterloo	230
West Linn	25,605
Westfir	255
Weston	685
Wheeler	405
Willamina	2,045
Wilsonville	22,870
Winston	5,410
Wood Village	3,910
Woodburn	24,670
Yachats	725
Yamhill	1,070
Yoncalla	1,060

Prepared by Population Research Center
College of Urban and Public Affairs
For Portland State University, 12/15/2015

From: Eric MacKnight <ericmacknight@mac.com>
To: <citycouncil@cityofsalem.net>
Date: 7/30/2016 11:39 PM
Subject: A new bridge over the Willamette

Dear members of the Salem City Council:

As you prepare to resume your work on the proposal to build a new bridge between West Salem and downtown Salem, I would like to say that nothing I have read so far about this project would lead me to support it. Here are my reasons, in brief:

•The cost estimates I have seen are outrageous, and the means of financing those costs onerous.
•The benefits of a new bridge, on the other hand, would seem to accrue mainly to a small minority.
•If the rationale is to divert long-distance trucking headed to and from the coast, then 1) a crossing further downstream, not in Salem, would make much more sense; and 2) in that case the state and federal governments should finance the project, not the people of Salem.
•If the rationale is to improve traffic in Salem, then it would seem to make much more sense to invest in seismic upgrades of the existing bridges, while at the same time adding a package of light rail + park 'n ride + cycling paths + enhanced city bus routes that would make the downtown shopping and business district more easily accessible while at the same time reducing automobile congestion.

I appreciate you taking the time to read and consider my thoughts on this issue.

Sincerely,

Eric T. MacKnight
2240 Wildwood Drive SE
Salem OR 97306
Mobile: 626-203-7887

DO NOT DECREASE MY PROPERTY'S VALUE FOR A PROJECT THAT MAY NEVER HAPPEN!!!

Deborah Mancini
730 Hope Ave NW

Amber Mathiesen - My Support of resolution 2016-35

From: "Todd Londin" <todd@abcwindowsor.com>
To: <citycouncil@cityofsalem.net>
Date: 8/8/2016 12:35 PM
Subject: My Support of resolution 2016-35
CC: "'Nick Williams'" <Nick@SalemChamber.org>
Attachments: image009.jpg; image002.jpg; image004.jpg; image006.jpg; image008.jpg; image011.png; image013.jpg; image015.jpg

To Salem Mayor, Anna Peterson and Salem City Council,

I want you to know that as a local business that makes many trips across the current 2 bridges, at all times of the day, **I strongly urge you to pass the resolution 2016-35.** Let's move the bridge project forward, I have heard enough about the pros and cons, the Pro's far outweighs the cons and as a community we must look at this as the future of Salem.

Sincerely
Todd S. Londin ~ President
ABC Windows and Building Maintenance LLC
503-363-4457 Office
503-991-7270 Cell
www.ABCWindowsOR.com

Use these links to find out more or leave a POSITIVE comment




From: <epwhitehouse@comcast.net>
To: <Citycouncil@cityofsalem.net>
CC: <manager@cityofsalem.net>
Date: 8/8/2016 1:46 PM
Subject: Comment, August 8, 2016 Council Meeting, Agenda #3.2a

Dear Mayor and Councilors:

Regrettably, I will not be able to attend tonight's meeting, and so I ask that these comments please be included in the public record:

My name is Evan White, and I live in Ward 7. Four years ago, when I ran for Salem City Council, I remember that my friend Jim Lewis and the Salem Association of Realtors asked for my thoughts about the third bridge. I suspected that the "right answer" was "great idea, let's do it as soon as possible, regardless of the costs and benefits." I replied by saying that I was aware that a draft EIS was being prepared, and that I could not answer the question until I reviewed the EIS.

I subsequently obtained a copy of the EIS. For a price of eight hundred million dollars, it would be possible to reduce travel times by an average of about four and a half minutes – twenty years from now.

A hearing was then held before City Council. There was a parade of witnesses from the Chamber of Commerce, the Homebuilders Association, and various realtors who thought that this plan to Los Angelize West Salem was a wonderful idea. Council subsequently adopted the "Preferred Alternative," which would cost only half as much and do less damage to the environment. However, I've seen no estimate of the benefits that might occur from spending more than four hundred million dollars.

One of the purposes of Oregon's land use planning laws is to protect forest and farm lands from unnecessary urban sprawl. I suspect that those who favor the third bridge are actually interested in more urban sprawl, and less interested in efficient urban transportation systems. Why did the Chamber of Commerce so vigorously oppose the payroll transit tax that would have been used to improve our crippled urban transit system? To me, the notion that Oregon's land use planning regulations should be used to encourage more urban sprawl is obscene. Thanks for listening.

Amber Mathiesen - No third Bridge meeting at city hall.

From: Dawn Watson <dw079302@gmail.com>
To: <citycouncil@cityofsalem.net>
Date: 8/8/2016 1:56 PM
Subject: No third Bridge meeting at city hall.

City Council of Salem Oregon: August 8/ 8/ 2016

I am unable to be at the City Hall in Salem Oregon this evening in protest of the building of a third bridge here in Salem. I do not want to lose the home, we live in on Hope Ave. NW. I do not want the value of my property to decrease in value. Can't you keep an open mind about this, there are empty buildings all over Salem and it is a disgrace to see so many new buildings setting empty there are a growing number of homeless people all over the city, couldn't you put your ideas and money to better use then building a bridge that most of the people of this City don't want??? Have you forgotten that Salem is the Capitol of Oregon? What has happened to the pride why with so many homeless people would you not fix that situation first and foremost.

Who is going to pay for this bridge the good people of Salem?? What about our homes becoming eminent domain properties of the city so you can build this bridge? What about the 45 homes and 25 businesses, can Salem afford to do this stupid project, who decides you or the people?? I guess I know the answer to that but I probably won't hear back about this and I probably wouldn't like your answers anyways, but take the time to answer it would be good protocol, and would ease my mind. To your reply.

D. S. Watson, NW Salem Citizen

dw079302@gmail.com

Amber Mathiesen - New Bridge

From: <barb.hackeresch@summitwm.net>
To: <citycouncil@cityofsalem.net>
Date: 8/8/2016 3:36 PM
Subject: New Bridge

Councilors,

Please vote to continue bringing the third vehicular bridge to fruition. We need it desperately to keep Salem vibrant and attractive as the community continues to grow.

Thank you for your service, it is greatly appreciated.

Click on my business card and its tabs to learn more.

Save details to address book

Sincerely,

Barbara Hacke Resch
Senior Financial Advisor
PIM Portfolio Manager
Summit Wealth Management

Wells Fargo Advisors Financial Network, LLC | 1500 Liberty St. SE Suite 250 | Salem, OR 97302
Tel 503-798-4340 | Toll-free 855-707-4330 | Fax 503-798-4333

barb.hackeresch@summitwm.net | http://www.summitwm.net

Amber Mathiesen - Bridge - Resolution 2016-35

From: "Dirk Moeller" <dirk@bcanswer.com>
To: <citycouncil@cityofsalem.net>
Date: 8/8/2016 1:53 PM
Subject: Bridge - Resolution 2016-35

Salem City Council:

The time has arrived for the citizens of Marion and Polk Counties to get a regional push for additional vehicle capacity over the Willamette River. In 1996 I moved my family back to Salem and a city counselor said *"Even if we had all the money we needed for another bridge, it would be another ten years before the first bus, car, truck or bike will cross it"*…that was 20 years ago and progress has stalled.

ODOT's annual budget is over $5 Billion. If the regions elected officials work together, the Salem region should be able to get a piece of the $5 Billion budget so we can build a bridge that will be used by our children and our grandchildren. If the Salem region continues to be passive, Multnomah and Washington County will gladly continue to take the majority of ODOT funds.

Dirk Moeller
Business Connections - Never Underestimate the Power of the Personal Touch
International Award Winner for Outstanding Service 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015 & 2016
660 High Street N.E.
Salem, Oregon
503-363-0056
dirk@bcanswer.com
www.bcanswer.com

August 8, 2016

Salem City Council
555 Liberty Street SE
Salem OR 97301

RE: Agenda Item 3.2a: Resolution to initiate UGB amendment for the Salem River Crossing

Mayor and Councilors:

I have three comments for your consideration.

1. **Make upgrading the existing bridges to survive a Cascadia Subduction Zone earthquake the city's top transportation priority.**

While we've been studying how to better address future transportation needs, we've discovered that our transportation system faces a much bigger challenge, specifically a Cascadia Subduction zone earthquake. Experts now say that there is a 20% chance of a magnitude 8+ earthquake striking Western Oregon in the next 50 years. And, if that happens, ODOT says the Marion and Center Street bridges are likely to collapse. We need to get our priorities straight: fixing our existing bridges so that they survive an earthquake is simply much more important to keeping our community livable and prosperous than building a new bridge. We should put off planning for a new bridge until we have funding in place to make our existing bridges earthquake-safe.

2. **The city can - and should -move forward with Marine Drive and the proposed bike path without a UGB amendment.**

At last Monday's meeting (August 1), the council was advised by staff that a UGB amendment was needed to allow construction of Marine Drive and/or a bikepath on the Marine Drive alignment. That advice was incorrect. The Transportation Planning Rule (TPR) lists transportation facilities and improvements that may be allowed on rural lands (i.e. outside of a UGB) without a goal exception. The rules clearly allow for bikepaths and, in limited circumstances, new collector roads. Specifically, the TPR allows two-lane collector roads where the function of the road is to reduce local access on circulation on a state highway. It appears that Marine Drive, as currently called for in the city's transportation plan would meet this requirement: it is intended to reduce local traffic and provide for local circulation away from Wallace Road, which is a state highway.

Here are the relevant portions of the TPR (OAR 660-012-0065):

> (3) The following transportation improvements are consistent with Goals 3, 4, 11, and 14 subject to the requirements of this rule:
> (a) Accessory transportation improvements for a use that is allowed or conditionally allowed by ORS 215.213, 215.283 or OAR chapter 660, division 6 (Forest Lands);
> (b) Transportation improvements that are allowed or conditionally allowed by ORS 215.213, 215.283 or OAR chapter 660, division 6 (Forest Lands);
> (c) Channelization not otherwise allowed under subsections (a) or (b) of this section;
> (d) Realignment of roads not otherwise allowed under subsection (a) or (b) of this section;
> (e) Replacement of an intersection with an interchange;

(f) Continuous median turn lane;
(g) New access roads and collectors within a built or committed exception area, or in other areas where the function of the road is to reduce local access to or local traffic on a state highway. These roads shall be limited to two travel lanes. Private access and intersections shall be limited to rural needs or to provide adequate emergency access.
(h) Bikeways, footpaths and recreation trails not otherwise allowed as a modification or part of an existing road;

Marine Drive and the proposed bike path are both good projects that will help make West Salem more livable and ease traffic problems on Wallace Road.

3. If you do move forward, adopt a schedule that gives the public a meaningful opportunity to participate in this decision.

The essence of good land use planning is that the public be given a meaningful opportunity to participate, especially in major decisions.

An urban growth boundary (UGB) amendment and goal exception are big land use decisions. They need to be carefully considered and properly justified. Specifically, to meet state land use requirements for a UGB amendment for a new bridge the city must show that there are no reasonable options for meeting transportation needs within the UGB. However, the analysis to support this decision has yet to be done. Neither the Draft EIS prepared in 2012 nor the Land Use Technical Report prepared in 2013 provide necessary information to address land use requirements. Detailed technical reports that address land use requirements have yet to be completed. Until these reports are available, and the public and elected officials have had a meaningful opportunity to review, comment and discuss them, a decision is premature.

A two or three month process with one or two public hearings provides too little time and too little opportunity for meaningful public participation or a well-considered decision. If you do adopt this resolution, you should adopt a schedule that builds in sufficient time and additional public hearings so that you can carefully consider the information and make well thought out decision, and also give the public, including the city's neighborhoods, a chance to effectively participate in this decision.

Sincerely,

Robert Cortright

373 Suncrest Avenue NW
Salem, OR 97304

Bryan Colbourne - Please do not add Third Bridge to City Transportation Plan

From: Judy Dowell <judy97424@hotmail.com>
To: "lmanderson@cityofsalem.net" <lmanderson@cityofsalem.net>
Date: 8/9/2016 7:53 AM
Subject: Please do not add Third Bridge to City Transportation Plan

Hi
My name is Judy Dowell. I live in west Salem and live very close to the site you propose for the third bridge. The addition of the third bridge to the city transportation plan will make it very difficult to sell my home. The value of my property will drop like a brick. Until there is dedicated funding to build a bridge that may never happen, please do not affect our property values for no reason. It is very likely the bridge will never be built given the amount of money both ODOT and USDOT have available for such new projects. Please wait until it is likely the bridge will be built before you formally add it to the transportation plan. There is no reason to do it now and lots of reasons to wait.
Thank you.
Dr. Judy Dowell, DVM
541-517-3042

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

September 27, 2016

Julie Warncke
Transportation Planning Manager
City of Salem Public Works Department
555 Liberty St SE / Room 325
Salem, OR 97301

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

SUBMITTED VIA EMAIL

Dear Julie,

Thank you for the opportunity to comment on the joint urban growth boundary (UGB) amendment with Polk County, Keizer, and Marion County for approximately 35 acres to accommodate the transportation need identified in the Salem River Crossing Preferred Alternative to construct a new bridge across the Willamette River.

As part of the 35-day notice, the city provided the Department of Land Conservation and Development with the some of the required findings. Those are addressed below. Missing from the initial proposal were findings for Goal 10 (Housing) and division 8, Goal 12 (Transportation) and division 12, and Goal 14 (Urbanization), division 24 and division 38. We received those draft findings on Thursday September 22, 2016; consequently, this department has not had adequate time to review and include comments in this initial participation letter.

Goal 15, Willamette River Greenway

The information provided for the Willamette River Greenway goal lacks a discussion specifically about access to and along the river. Access along the river is the primary reason for the structural setback requirement in the goal and the exception material discusses impacts to recreation uses, but does not specifically talk about access to and along the river.

We understand that the city has plans and policies in place to preserve the option for a planned path along the river on the west side. Pilings will be used to support the bridge and there will be plenty of room to walk/bike under the bridge. On the east side, the city has stated priorities to maintain a bike and pedestrian route along Front Street. Front Street is to be moved closer to the river to make room for the bridge's descent to grade by the time it gets to Commercial Street. Given that the bank is steep in this location, other options for physical access to and along this

portion of the river may not be feasible. During the design phase for the Front Street alignment, the city will be able to advocate for visual access to the river within the city's greenway permit-review process.

The materials provided in support of an exception to Goal 15 is one step in the overall Greenway compatibility review that will need to be completed by the city. When ODOT makes application for local permits, DLCD recommends that the city consider options for providing visual access to the river along the realigned portion of Front Street.

Conclusion

Please enter these comments into the record for the plan amendment. Because we did not receive all of the findings necessary to review this UGB amendment 35 days before the first evidentiary hearing, additional comments following a full review will be submitted by the October 12 hearing.

We recommend the council continue the hearing on this matter so that it can review state findings that will help it determine if this proposal is in compliance with state statutes and the statewide planning goals.

Sincerely,

Angela Lazarean Carnahan

Angela Lazarean Carnahan
Mid-Willamette Valley Regional Representative

cc: Amanda Punton, DLCD Natural Resources Specialist
Bill Holmstrom, DLCD TGM Coordinator
Gordon Howard, DLCD Urban Planning Specialist

City of Falls City
299 Mill Street
Falls City, OR 97344
Ph. 503.787.3631

OFFICE OF THE MAYOR
AND CITY MANAGER
TERRY UNGRICHT

October 9, 2016

Subject: Application CA16-04

Dear Honorable Mayors, Councilors, Planning Commissioners and County Commissioners,

On behalf of the City Council of Falls City, I would like to voice our support of the proposed land-use actions before you that are necessary for the implementation of the preferred alternative for the third bridge across the Willamette River.

The City of Falls City has in the past and continues to support this effort for a number of important reasons. The preferred alternative would provide an option for commuters and freight without impacting downtown Salem, it would relieve congestion on the current bridge, and provide more efficient movement of goods and services within our region. With the current warnings of a Cascadia fault line event, the new bridge would be constructed to withstand an earthquake event, which would provide critical access for emergency responders in such an event. It is unlikely that the current bridges would withstand such an event.

All residents in Polk County use the current crossing and we all know the traffic problems that occur at the only major crossing of the Willamette River. We support and urge this project to move forward it would have a region wide positive impact, not only to the residents of Falls City, but to all residents of Polk County.

Please enter this letter of support into the record on this matter.

Thank you

Terry Ungricht

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,

Riverkeeper & Executive Director
Willamette Riverkeeper

From: Eric MacKnight <ericmacknight@mac.com>
To: <citycouncil@cityofsalem.net>
Date: 9/17/2016 12:21 PM
Subject: new bridge (and water rates)

Dear members of the Salem City Council,

I would like to add my voice to those calling for the city to stop spending money on planning for a new bridge over the Willamette River.

First priority should be given to seismic upgrading for the existing bridges and for the Library / City Hall complex.

Once those critical seismic upgrades are completed, the relatively mild traffic problems during Salem's rush hour should be addressed with improved public transportation combined with park 'n ride lots and protected bike lanes for commuters.

Finally: I sincerely hope that the ludricous proposal to raise water rates for all of Salem in order to give Creekside Golf Course a rate reduction has been abandoned once and for all.

Sincerely yours,

Eric T. MacKnight
2240 Wildwood Drive SE
Salem OR 97306
Mobile: 626-203-7887
http://www.EricMacKnight.com/

THE CITY OF
DALLAS
OREGON

October 6, 2016

Subject: Application CA16-04

Dear Honorable Mayors, Councilors, Planning Commissioners and County Commissioners,

On behalf of the City Council of Dallas, I would like to voice our support of the proposed land-use actions before you that are necessary for the implementation of the preferred alternative for the third bridge across the Willamette River. The City of Dallas has in the past and continues to support this effort for a number of important reasons.

The preferred alternative would provide an option for commuters and freight without impacting downtown Salem, it would relieve congestion on the current bridge couplet, provide more efficient movement of goods and services within our region, and be constructed to withstand an earthquake event, which would provide critical access for emergency responders in such an event. It is unlikely that the current bridges would withstand such an event.

For these reasons, the City of Dallas would like to reiterate our support for this project.

Please enter this letter into the record on this matter.

Thank you.

Sincerely,

Brian Dalton

Mayor, City of Dallas

775 Fir Garden St. NW * Salem, OR 97304 * emeasterly@comcast.net

Oregon Land Use Goal One Failure

Re: CA 2016-04 Date: October 12, 2016

To: Mayor Peterson, Council Members and Members of the participating Salem Area Comprehensive Plan decision making governments:

I urge you to to go forward with the staff recommendation to expand the Salem Urban Growth Boundary to the eastern edge of the 2002 Council adopted Marine Drive right-of-way.

Ten years ago the Salem bureaucracy authorized a West Salem subdivision that required dedication of land identified as part of the Marine Drive right-of-way to the City of Salem.

The approved subdivision included the City acquiring the Marine Drive right-of-way as well as a series of bureaucratic non-decisions resulted in conditions that were never executed and procedures that contradicted the Salem Revised Code. One of those non-decisions resulted in the illegal platting of River Valley subdivisions lots outside the Salem city limits.

By expanding the Salem Urban Growth Boundary to the eastern boundary of the Marine Drive right-of-away along the River Valley subdivision Council will be correcting the flawed 2006 bureaucratic failure.

However, I also ask you to not support inclusion of parcels that expand the UGB beyond land east of the Council adopted Marine Drive right-of-away. The graphic I am distributing shows a progression of the earlier recommended 4D and then the adopted Preferred Alternative by Salem City Council. The third and fourth graphics present portions of the proposed land use modifications to the Salem UGB, Comprehensive Plan and Transportation System Plan that were offered for your consideration over the last few days/weeks. Contrary to Goal one requirements[1] there has been no opportunity for community members to review and consider the multiple reports and finding offered by the City prior to the initiation of the formal CA 2014-04 quasi-judicial process. Amending the Salem UGB and TSP, are the actual "land use decisions" to which Goal one policies apply

I make this request because no formal goal one outreach regarding the land use proposals before you was conducted after the preferred crossing alternative was adopted by the City Council in 2014. The vacuum of information and opportunity for citizens to review the proposed comp plan modifications being presented to you were never shares with the general pubic prior to the announcement of the formal hearing process. There has been no opportunity for the public to review the technical recommendations recently posted on the CA 2016-04 site in preparation for this proposed comp plan public hearing prior to the initiation of formal hearing process. The public release of the March 2016 Engineering Study on October 5th highlights the City's failure to engage citizens prior to the public land use hearing process. Ms. Warncke could have shared the details of the proposed UGB expansion with the WSNA but did not.

This rush to decision contrasts with the outreach effort conducted by Salem prior to the adoption of the preferred Willamette River crossing. This Goal 1 public engagement deficiency needs to be addressed before the CA2016-04 comp plan revisions are adopted.

Sincerely,

/s/

E.M. Easterly

Attachments: **A. Preferred Willamette River Crossing Graphic Timeline;**

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1 GOAL 1: CITIZEN INVOLVEMENT OAR 660-015-0000(1) C. CITIZEN INFLUENCE
6. Revision -
The general public,through the local citizen involvement programs, should have the opportunity to review and make recommendations on proposed changes in comprehensive land-use plans **prior to the public hearing process** to formally consider the proposed changes.

A. Timeline

Part of Figure 2.3- 49. Detail of Alternative 4D Salem River Crossing

Part of The "Salem Alternative" Salem River Crossing
ENDORSED BY COUNCIL JUNE 24, 2013

Part of Figure 1.2-5: Preferred Alternative **Salem River Crossing Project Right-of-Way Technical Report Addendum August 2016**

Part of Figure 4.2-1: Preferred Alternative Right-of-Way Impacts **Salem River Crossing Project Right-of-Way Technical Report Addendum August 2016**


VALLEY DR NW
HOPE AV NW

B. Glen Gross Letter

CITY OF Salem
AT YOUR SERVICE

December 17, 2015

E.M. Easterly
775 Fir Gardens St NW
Salem, OR 97304

Mr. Easterly:

Thank you for your December 7, 2015 letter regarding the Valley River subdivision identifying the apparent discrepancy between the final platted boundary of the subdivision and the Urban Growth Boundary ("UGB"). We agree that a small portion of some of the lots within the platted subdivision cross over the UGB. None of the application materials submitted at the time the tentative plan or final plat were approved indicate the subject property crossed over the UGB, and staff was unaware of this issue until your brought it to our attention.

At this time there is no need to undertake any land use or enforcement action to address the issue. The final plat for the subdivision was approved and filed with Polk County in 2007 and homes have been built on the affected lots.

As the map you provided indicates, the subdivision abuts future Marine Drive to the east. The City will be undertaking a land use action to bring into the City those portions of Marine Drive that are outside the UGB. When that land use action is undertaken, this issue may be addressed and the UGB may be adjusted to include these properties.

Please contact me if you have any questions regarding this matter.

Sincerely,

Glenn W. Gross
Community Development Director
(503) 540-2306
Fax: (503) 315-2571
Email: ggross@cityofsalem.net
http://www.cityofsalem.net/CommunityDevelopment

COMMUNITY DEVELOPMENT
Planning Division • 555 Liberty St. SE / Room 305 • Salem, OR 97301-3513 • (503) 588-6173 FAX (503) 588-6005

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:

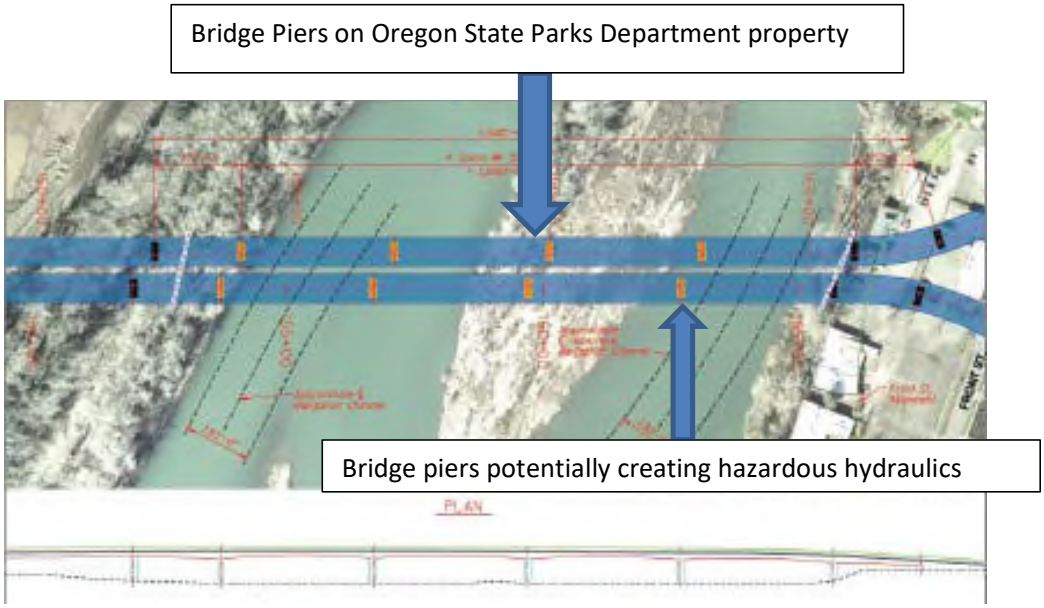
I represent the Glenn and Gibson Creek Watershed Council and would like to make comments on the proposal before you. The need for and location of additional river crossings of the Willamette River in the Salem-Keizer area has been the subject of much debate and deliberation over decades. Others with 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.

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.

- 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

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.

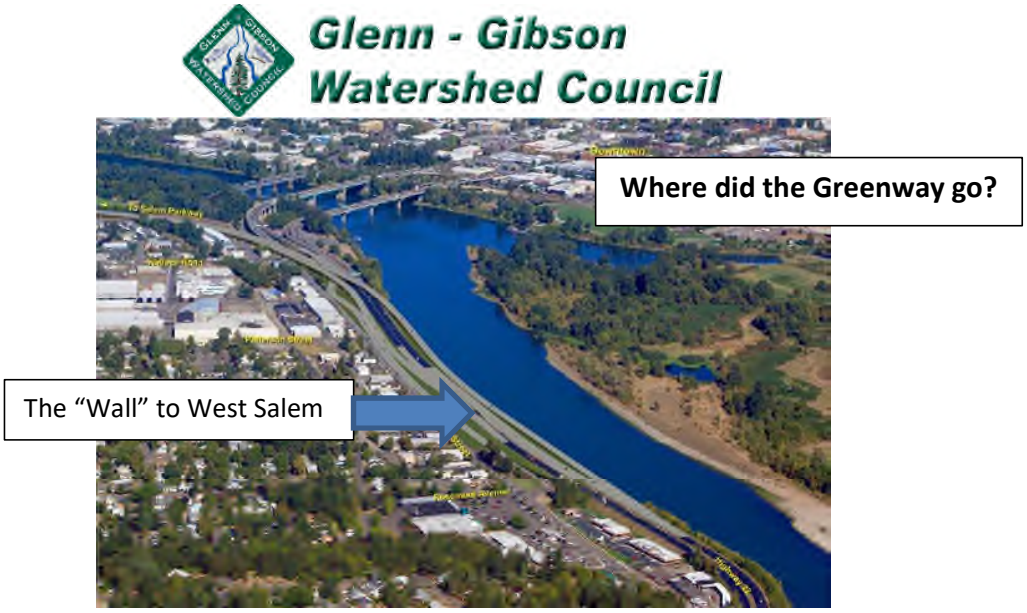
The proposed Goal 15 Exception was developed from the Draft EIS findings that are general to the area of the nine alternatives considered. The specific impacts of the current proposal have not been evaluated in detail. The findings are deficient in failure to recognize that Oregon State Parks has an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

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."



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

Attachment A

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.

Attachment A

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.

• *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

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

"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: "T*he 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*

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.

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair
2308 Ptarmigan St. NW, Salem, OR 97304 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
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.

1West Salem Neighborhood Plan

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair
2308 Ptarmigan St. NW, Salem, OR 97304 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.1

- **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.**

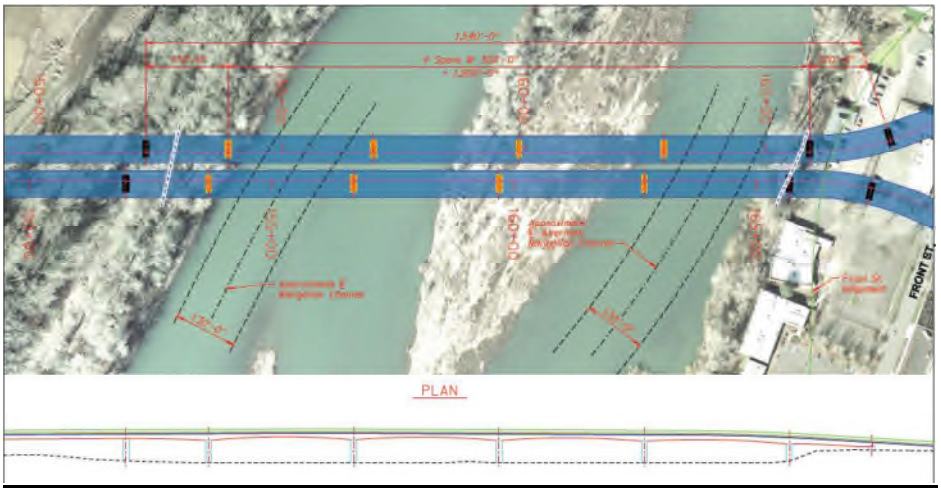
- **Extensive Ramp system isolates West Salem from the Willamette River**

1West Salem Neighborhood Plan

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair
2308 Ptarmigan St. NW, Salem, OR 97304 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.

1West Salem Neighborhood Plan

Testimony of Linda Bierly, WSNA Land Use committee member, WSNA Park Chair
2308 Ptarmigan St. NW, Salem, OR 97304 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.

Bryan Colbourne - Re: 918 Riverbend Rd NW

From: Julie Warncke
To: samantha montgomery
Date: 9/27/2016 9:42 AM
Subject: Re: 918 Riverbend Rd NW
CC: Daniel.L.FRICKE@odot.state.or.us; bernard.mark@co.polk.or.us
Attachments: SalemRiverCrossing_PA.pdf

Rich,
It might be easiest to discuss this in person, but I will try to explain the process in this email. Let me know if you would be interested in meeting. There are two separate, but related, processes underway - the Environmental Impact Statement (EIS) process and the Land Use Approvals. I'll discuss each separately below.

1. The EIS process is being done to comply with the National Environmental Policy Act (NEPA), and is led by the Federal Highway Administration, together with the Oregon Department of Transportation (ODOT) and the City of Salem. The EIS process tries to balance many issues, including impacts to residences and businesses, encroachment into the floodway, transportation benefit, impacts to historic resources, and more. Additionally, because engineering design has not been done at this planning stage, the EIS tries to assume worst case scenario in terms of impacts to properties. So, when the project advances to design, there would be efforts made to minimize impacts that could result in either no impact or a property only impact to your property (not displacement). Preliminary engineering will be done before right-of-way acquisition begins. At that time, the right-of-way specialists would contact individual property owners to negotiate purchase (at market value) and offer relocation assistance if appropriate. For Marine Drive, acquisition would likely be done through the City of Salem - however the City's process would be similar to what is described in the ODOT Right-of-way brochures (which are attached to the Right-of-way Technical Report). The Final EIS will be published in mid-2017 and will be available for public review at that time. The overall project website is www.salemrivercrossing.org.

2. The immediate action being proposed by the City of Salem and Polk County relates to land use approvals to support the recommended Preferred Alternative. This includes amending the Salem Transportation System Plan (TSP) to add the Preferred Alternative, amending the Urban Growth Boundary (UGB), and taking an exception to Statewide Planning Goal 15 (Willamette River Greenway). For the northern section of Marine Drive, the TSP amendment includes putting a circle at the intersection of Marine Drive and Riverbend Road Salem TSP. I am attaching a figure that points out the proposed amendments to the Salem TSP. The UGB amendment is needed because a road intended to serve urban transportation (Marine Drive) is not permitted in the Polk County Exclusive Farm Use (EFU) zone. These land use actions are being considered at a special joint public hearing on October 12th at 6PM at the Salem Center 50+.

The schedule for moving into design, right-of-way acquisition, and construction will depend on availability of funding. At this point, the City only has funding for a relatively short section of Marine Drive between Glen Creek Road and Cameo Street. It will likely be several years before funding is identified, at which point design could begin, including looking at modifications to the assumed footprint for Marine Drive.

This is a complex process and I would be happy to discuss it with you further. I am also copying on this email the ODOT Project Manager for the EIS process (Dan Fricke) and the Polk County Planner who is involved in the Polk County land use actions (Mark Bernard).

- Julie

>>> On 9/26/2016 at 6:40 PM, in message <BY2PR16MB02003ABECF84DE60FF965D1597CC0@BY2PR16MB0200.namprd16.prod.outlook.com>, samantha montgomery <sammontgomery4@hotmail.com> wrote:

Julie,

The building of a large round-about involving our front yard and field seems entirely unnecessary and cruel The round-about could simply be moved 50 feet to the east completely avoiding our property all together. There is lots of empty space and no one lives there since it is an empty field. Also, Glen Creek would not have to be disturbed and damaged. Using the other side of Riverbend Rd. for the widening would protect me as a home owner. The other side of the road is just a rental and a temporary nursery. The owner of that house doesn't live there. Why inconvenience my family, when you could inconvenience a renter instead? Putting Marine Drive right through the center of a newer apartment complex near my home makes no sense and is a danger to children as well. The road could simply go behind that complex and towards the field bordering my property. This should not involve any extra cost and road wouldn't be so unnecessarily curved.

We just put on an expensive roof last week and are right in the middle of upgrading and renovating our home. We had no idea the city of Salem was planning on trying to take our home and property. Our impression was that Salem might take the far eastern edge of our property I urge you to have a heart and reconsider how Marine Drive will be built. My wife and kids were devastated when they heard the news today. What is the time frame we are talking about with this road so that I may prepare to fight it? My property is not truly needed for the "public good" here in my opinion.

Rich Montgomery

From: Julie Warncke <JWARNCKE@cityofsalem.net>
Sent: Monday, September 26, 2016 12:08 PM
To: samantha montgomery
Subject: Re: 918 Riverbend Rd NW

Mr. Montgomery,
Your property would be impacted by the connection of Marine Drive to River Bend Road - which is anticipated to be with a round-about. Based on the conceptual design, the Right-of-way specialists anticipate that your property would need to be acquired for the project. The Right-of-way Technical Report is available on the project web page (http://www.cityofsalem.net/CA16-04), including an overview of the Preferred Alternative and appendices that discuss the Oregon Department of Transportation's Land Acquisition Program and Relocation Assistance Program.
07755852600014235 style="OVERFLOW: auto; MARGIN-BOTTOM: 20px; WIDTH: 100%; TEXT-INDENT: 0px">
2237718592560396 style="OVERFLOW: auto; BORDER-TOP: rgb(200,200,200) 1px dotted; WIDTH: 90%; BORDER-BOTTOM: rgb(200,200,200) 1px dotted; POSITION: relative; PADDING-BOTTOM: 20px; PADDING-TOP: 20px; MARGIN-TOP: 20px; BACKGROUND-COLOR: rgb(255,255,255)" cellSpacing=0>
7542266661391028 style="VERTICAL-ALIGN: top; POSITION: relative; PADDING-BOTTOM: 0px; PADDING-TOP: 0px; PADDING-LEFT: 0px; DISPLAY: table-cell; PADDING-RIGHT: 0px" colSpan=2>
17891975357430212 style='FONT-SIZE: 21px; FONT-FAMILY: wf_segoe-ui_light, "Segoe UI Light", "Segoe WP Light", "Segoe UI", "Segoe WP", Tahoma, Arial, sans-serif; FONT-WEIGHT: normal; COLOR: rgb(0,120,215); LINE-HEIGHT: 21px; TOP: 0px'>Home [cityofsalem.net]

10502633518389093 style='FONT-SIZE: 14px; FONT-FAMILY: wf_segoe-ui_normal, "Segoe UI", "Segoe WP", Tahoma, Arial, sans-serif; FONT-WEIGHT: normal; COLOR: rgb(102,102,102); MARGIN: 10px 0px 16px; LINE-HEIGHT: 14px'>www.cityofsalem.net
08407593051335338 style='OVERFLOW: hidden; FONT-SIZE: 14px; FONT-FAMILY: wf_segoe-ui_normal, "Segoe UI", "Segoe WP", Tahoma, Arial, sans-serif; FONT-WEIGHT: normal; COLOR: rgb(102,102,102); DISPLAY: block; LINE-HEIGHT: 20px; MAX-HEIGHT: 100px'>Salem River Crossing Land Use Application Case Number CA16-04. The Salem River Crossing refers to the environmental planning process that the City of Salem has been ...

Regarding road design, it will need to be elevated out of the floodplain. There will be sidewalks on Marine Drive and connecting to River Bend Road. Marine Drive will not extend north of River Bend Road. The location of the road was designed to minimize intrusion into the floodplain and to areas currently outside the Urban Growth Boundary.

Regards,
Julie

Julie Warncke
Transportation Planning Manager
City of Salem Public Works Department
555 Liberty St SE / Room 325
Salem, OR 97301-3513
Phone: 503-588-6211
Fax: 503-588-6025
Internet: jwarncke@cityofsalem.net

>>> On 9/25/2016 at 10:24 AM, in message <BY2PR16MB02009DEE27686AE1D71E308397CA0@BY2PR16MB0200.namprd16.prod.outlook.com>, samantha montgomery <sammontgomery4@hotmail.com> wrote:

> Julie,
>
> I would like to know how Marine Drive will effect my property at 918 River Bend Rd. I have a 4.71 acre property on both sides of Glen Creek. It looks like the road will be along the edge of my property. Can you explain how close the road will be? Glen creek that flows through my field floods pretty bad at times during the year. Will the road have to raised up high? Will there be sidewalks? Will the road continue to Brush College or will a ton of traffic be dumped onto River Bend Rd. Will River Bend Rd get sidewalks? Why can't the road come across the nursery more, rather than be so close to my property?
>
> Thanks,
> Rich Montgomery

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 3rd 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:
    - 1) Less ecological impact to waterfront and river channel,
    - 2) Shorter distance across river,
    - 3) Less disruptive and destructive of existing neighborhoods, residences and businesses,
    - 4) Existing bridges are inside the UGB so no complex process to expand UGB,
    - 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 3rd 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 Cherriots 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