



# GREENLIGHT ENGINEERING

TRAFFIC ENGINEERING/TRANSPORTATION PLANNING

October 28, 2019

City of Salem City Council  
555 Liberty ST SE RM 220  
Salem OR 97301

**RE: Comprehensive Plan Change / Zone Change / Zone Change Case No. CPC-ZC-ZC19 -10  
Response to E.M. Easterly Comments**

Dear Mayor Bennett and City Councilors,

This memorandum responds to the October 28, 2019 letter submitted from E.M. Easterly in regard to our December 23, 2018 traffic impact analysis (TIA). It should be noted that Mr. Easterly attempts to rehash supposed issues with Riverbend Phase 1, which is not relevant to this application in any way as the properties involved with Riverbend Phase 1 are separate from Riverbend Phase 2. At times in his letter, it is difficult to determine when he raises issues with Riverbend Phase 1 versus Riverbend Phase 2. In most cases, Mr. Easterly provides no link to any relevant local code or current industry guidelines or standards regarding his attacks on the technical merits of the Riverbend Phase 1 or Riverbend Phase 2 traffic impact analyses.

With all due respect to Mr. Easterly who has spent a number of hours reviewing the project materials and clearly cares about his community, he does not claim to nor does he likely have the training or expertise to understand the technical requirements of a traffic impact analysis. It is not a reasonable expectation to provide Mr. Easterly with all of the knowledge needed for him to fully understand the technical aspects of a traffic impact analysis. Traffic impact analyses are very complicated and a Transportation Planning Rule analysis adds even more complexity. We have attempted to understand Mr. Easterly's comments, but many were not of sufficient specificity to comprehend his concerns. Regardless, we have provided responses to some of his concerns within this letter as appropriate.

It should be noted that Tony Martin, P.E. of City of Salem staff, Keith Blair, P.E. of ODOT (who both reviewed the Riverbend Phase 1 and 2 TIAs, and other materials generated for each application) and myself all have years of specialized training, experience and are all professional engineers registered in the State of Oregon. All are experts in traffic engineering and traffic analysis. Mr. Martin and Mr. Blair both provided comments based on their review of the December 23, 2018 TIA requesting additional information or analysis that we included in our February 7, 2019 memorandum. Subsequently, neither expert raised further questions regarding the analysis nor any of the issues that Mr. Easterly has raised.

### Experience and Expertise

I am a Professional Engineer (P.E.) registered and practicing in Oregon, Washington, and Montana. I hold a Bachelor of Science degree in Civil Engineering. I have over 20 years of experience in traffic engineering and transportation planning evaluating, preparing analyses, and reviewing the transportation impacts of residential, commercial and industrial development in my work in both the private and public sectors.

Received At Council Meeting

Meeting Date: 10-28-19

Agenda Item: 4a

Received by: [Signature]

From: Rick Nys

### **Responses to Mr. Easterly's October 28, 2019 Comments**

Mr. Easterly's summarized comments are provided in bold italicized typeface while our responses are in regular typeface.

#### ***Riverbend Phase 1 included errors***

As described above, Riverbend Phase 1 issues are not relevant to this application. In many cases, Mr. Easterly's references to Riverbend Phase 1 versus Riverbend Phase 2 are indiscernible and/or are mixed such that any comments he has on Riverbend Phase 1 he tries to relate to Riverbend Phase 2. Any comments of that nature are not addressed further in this response as they are not relevant to this application.

#### ***Riverbend Phase 2 included technical errors in the TIA***

Again, Mr. Easterly does not report to have any expertise or training in traffic engineering. He cites no references to technical references that he has reviewed regarding the technical merits of the TIA such as trip generation, trip distribution or other elements of traffic analysis. Mr. Easterly claims the TIA contains "unexplained discrepan[ies]," is "opaque," "convoluted," and is a "jumble of truncated and contradictory numbers." Because Mr. Easterly does not have the training or expertise to review a TIA and does not understand the TIA or traffic engineering does not equate to flaws in the TIA.

#### ***A 2018 analysis of Wallace Road/Glen Creek Intersection should have been included***

Mr. Easterly lacks understanding of the process and purpose of a Transportation Planning Rule analysis. Per OAR 660-012-0060(1)(c), a Transportation Planning Rule analysis is based upon the "...projected conditions measured at the end of the planning period identified in the adopted TSP." The City of Salem's planning period of their Transportation System Plan and the regional travel demand forecasting model is based on a year of 2035. Therefore, a 2035 analysis was conducted.

Mr. Easterly is likely also not aware that the City of Salem will require a Site Plan Review prior to development of the site. That Site Plan Review will require an additional traffic analysis. Riverbend Phase 1 opted to combine the TPR and Site Plan Review analysis into one TIA, but it is not required for approval of a zone change or comprehensive plan amendment. That future Site Plan Review TIA will include a near term analysis of study intersections based upon City of Salem and ODOT requirements at the time of that application.

#### ***Traffic counts from 2017 shouldn't be accepted***

Per the Riverbend ODOT TIA scoping memo, "Existing ODOT manual counts within the study area may be used for this analysis, if less than two years old. If count data older than one year is to be used, it shall be adjusted using an approved growth rate to reflect current conditions."

Per the City of Salem *City of Salem Public Works Design Standards*, "Traffic counts that are older than two years; taken during holiday weeks; or taken during construction shall not be used."

For a TIA completed in 2018, traffic counts from 2017 are appropriate. The traffic counts were adjusted per ODOT requirements.

### ***The trip cap of Riverbend Phase 1 should be applied to Riverbend Phase 2***

Again, Mr. Easterly lacks the necessary knowledge regarding process and purpose of a trip cap. A Transportation Planning Rule analysis compares the impacts of the existing zoning versus the proposed zoning for individual properties. The existing zoning generates an assumed amount of trips, which is captured in the local travel demand forecast model of the Mid-Willamette Valley Council of Governments. The difference in trips between the existing zoning and proposed zoning of Riverbend Phase 2 was evaluated in the December 23, 2018 TIA. Mr. Easterly seems to believe that the trip cap of Riverbend Phase 1 should somehow be applied to Riverbend Phase 2 as if the overall trips on Wallace Road are now limited upon all future land use actions. However, a trip cap, completely separate from the trips capped on Riverbend Phase 1, may be imposed on Riverbend Phase 2. As the Riverbend Phase 2 TIA presents a conceptual level of development and the approval of the application does not guarantee any particular development at this time, staff has not proposed a trip cap. However, the applicant is agreeable to a trip cap for Riverbend Phase 2 based upon the trips illustrated in the TIA.

### ***How is a trip cap enforced?***

Trip caps are typically enforced by local jurisdictions by evaluating the trip generation of actual development as it occurs. For example, in the case of Riverbend Phase 2, specific development will be proposed as part of a Site Plan Review TIA. That TIA will rely upon the ITE *Trip Generation Manual*, the industry and City of Salem standard for developing trip generation estimates based upon the number of units or size of development. As part of a zone change or comprehensive plan amendment TIA, it is typical that a conceptual level of development is assumed, but then with an application for development, the proposed trips are evaluated against the trip cap.

### **Conclusion**

I trust that this memorandum addresses the comments provided by Mr. Easterly. Should you have any other questions or comments, please don't hesitate to contact me at [rick@greenlightengineering.com](mailto:rick@greenlightengineering.com) or 503-317-4559.

Sincerely,

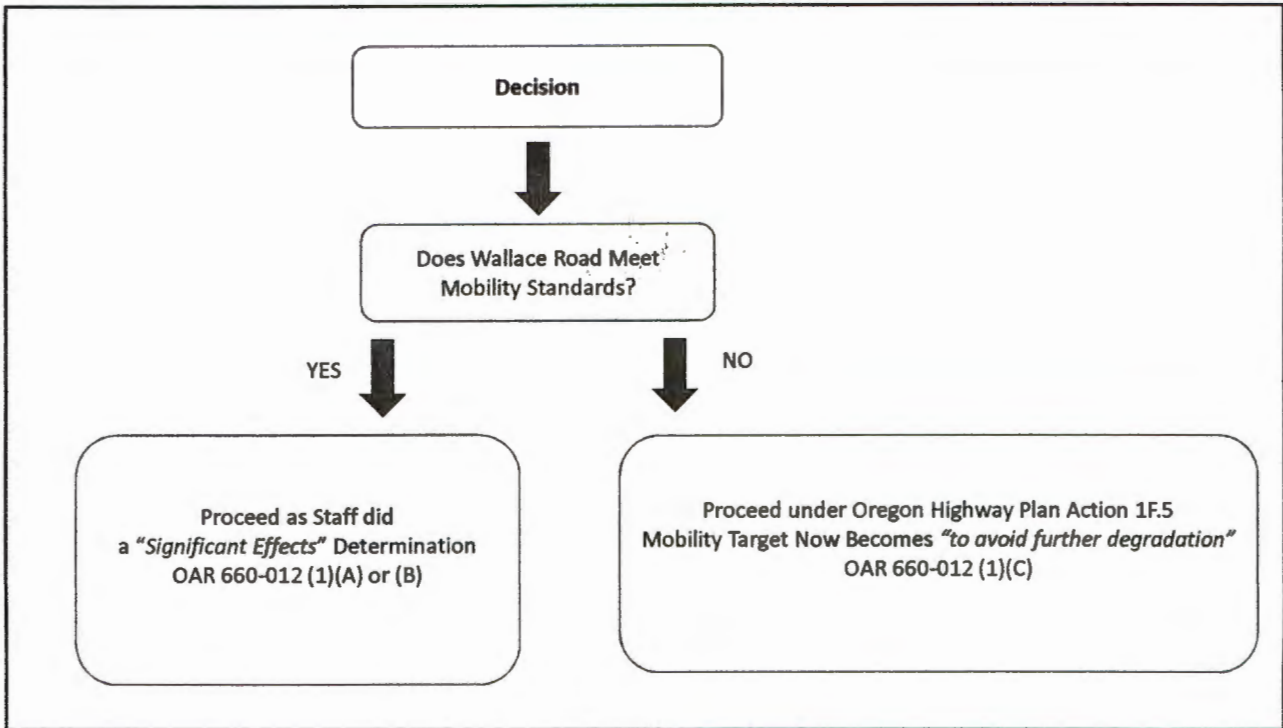
*Rick Nys*

Rick Nys, P.E.  
Principal Traffic Engineer

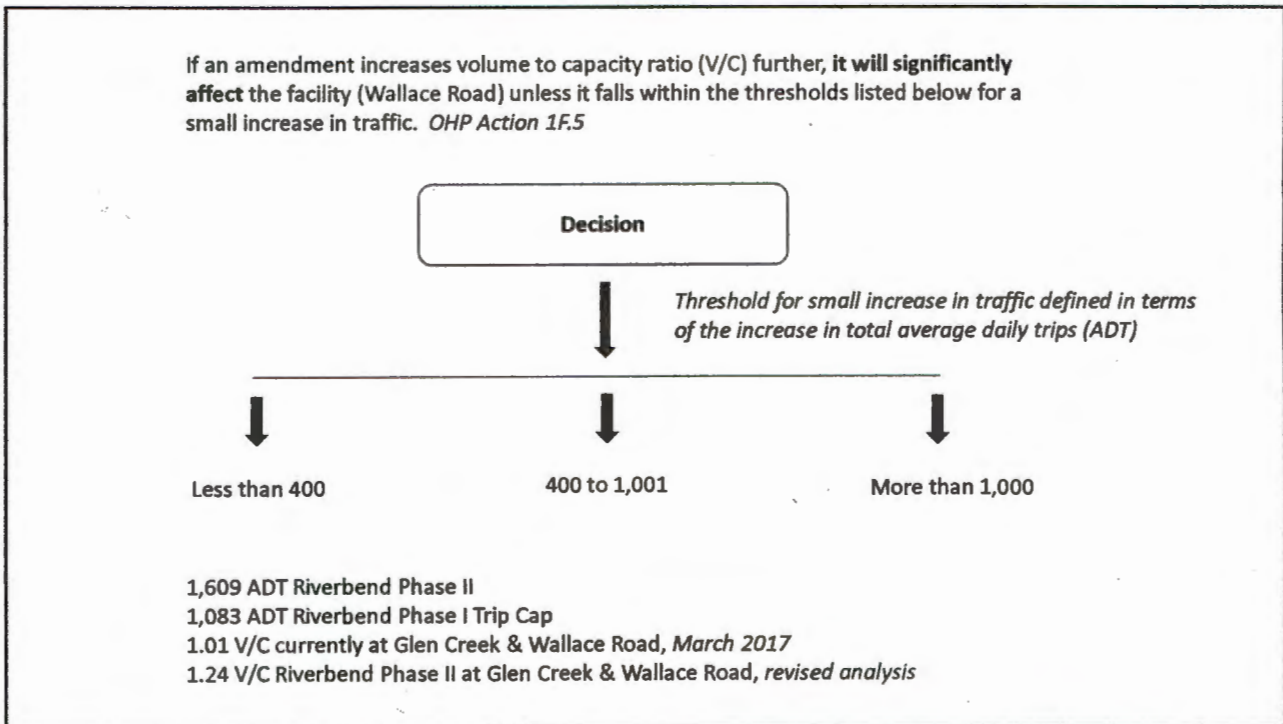




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 Meeting Date: 10/28/19  
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 Received by: A. Johnson  
 From: Steve Anderson



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If the increase in traffic between the existing plan and the proposed amendment is more than 1,000 average daily trips, then it is not considered a small increase in traffic and the amendment **causes further degradation** of the facility (Wallace Road) and would be subject to existing processes for resolution. *OHP Action 1F-5*

#### Decision

1,609 ADT Riverbend Phase II  
 1,083 ADT Riverbend Phase I Trip Cap  
 1.01 V/C currently at Glen Creed & Wallace Road  
 1.24 V/C Riverbend Phase II revised analysis

**The burden of determining whether an amendment would “significantly affect” a transportation system (Wallace Road) lies with the local government, not with ODOT.** *Development Review Guidelines, Chapter 3 TRP Review, May 2017*

#### Action Required

**Riverbend Phase II does increase the V/C ratio, has more than 1,000 ADT causing further degradation of Wallace Road; therefore its traffic impacts will “significantly affect” Wallace Road requiring mitigation per applicable rules, regulations, and policies.**

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#### Analyses & Decision

*Existing processes for resolution*

Investigate & apply reasonable mitigations  
 per OAR 660-012-0060(2)(a)-(e)

ODOT approval is required for all  
 mitigation measures to Wallace Road,  
*ODOT letter January 7, 2020*

Calculate V/C ratio after applying  
 mitigations



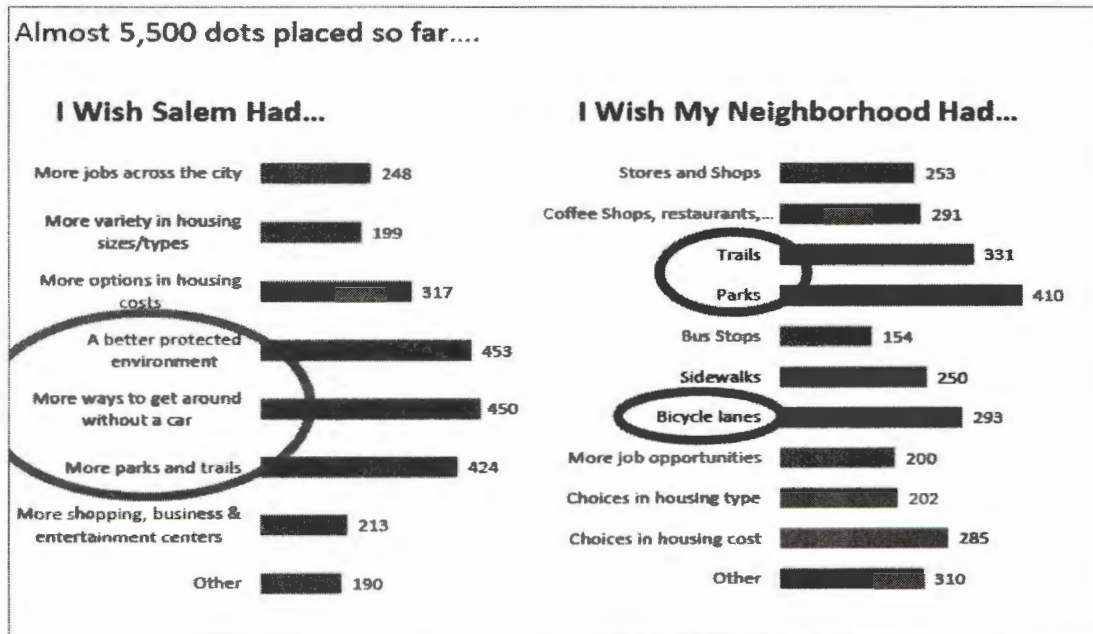
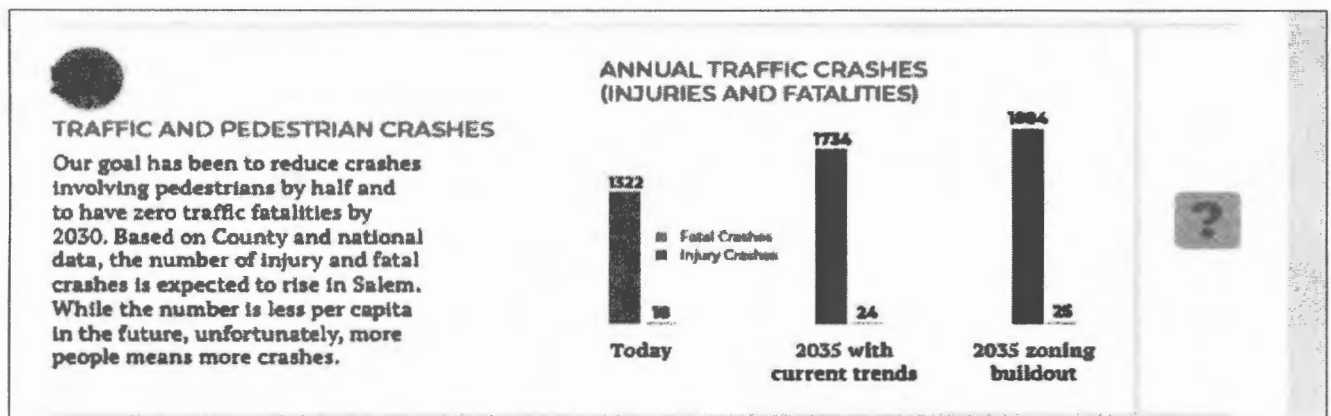
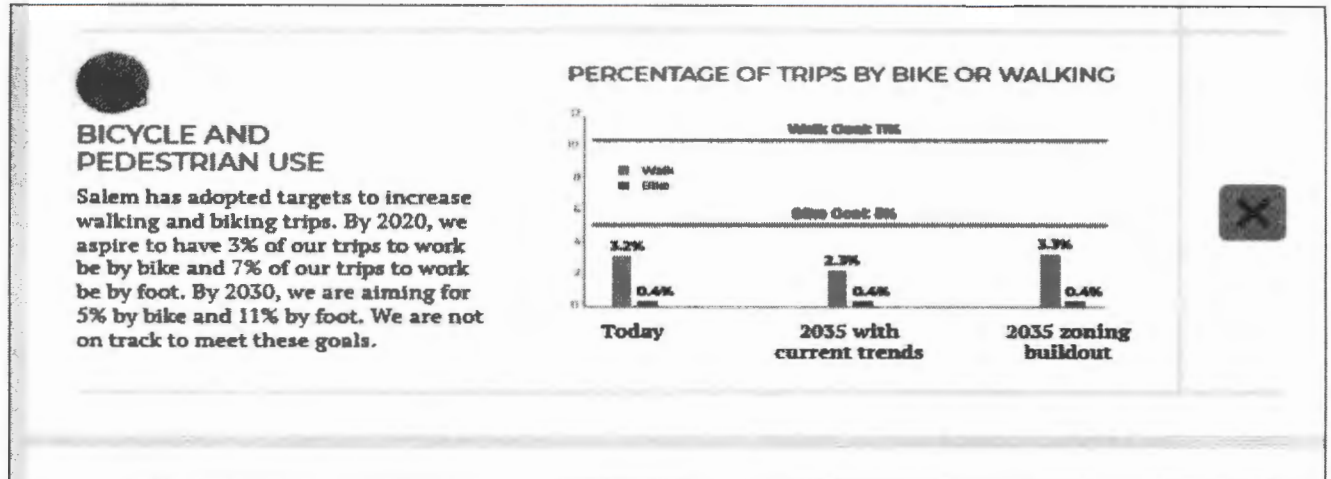
In applying OHP mobility standards to analyze mitigation, ODOT considers calculated values for V/C ratios that are within 0.03 of the adopted standard (0.95 for Wallace Road) to be considered in compliance with the mobility standard.  
*OHP Action 1F.5*

0.95 V/C Wallace Road Mobility Standard  
 1.18 V/C Riverbend Phase II at Glen Creek & Wallace Road  
 1.24 V/C Riverbend Phase II at Glen Creek & Wallace Road, *revised analysis*  
 1.01 V/C currently at Glen Creed & Wallace Road, *March 2017*

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# Trail Are Good

10/28/2019



Charts from "Our Salem" website, 2019.

Received At Council Meeting  
 Meeting Date: 10-28-19  
 Agenda Item: 2  
 Received by: K. Wigg  
 From: Mark Wigg