

Written Testimony, Salem Third Bridge Hearing

October 12, 2016

C. Russell Beaton, Task Force Member

I had the privilege of serving on the Salem Third Bridge Task Force from the time it was established some seven or eight years ago. It is a matter of record that the preferred alternative was voted out of the task force by a vote of 13 for the proposal, 10 for the "no build" option (the only allowable alternative in the voting at that time) and one abstention. The preferred alternative has of course subsequently been amended into the "Salem Alternative," which is the currently considered option.

For the record, I was one of the 10 votes, but, as was the case with all the other "no build" voters, was definitely not in favor of doing nothing. In fact, there was an entire range of reasons task force members had for voting as one of those 10. Some thought one of the other (9 originally, then truncated to 4) options was preferable to the one we were voting on. Some had concluded that the funding would be impossible, and saw no reason to vote it out of the task force. Others thought realistic options had not been adequately considered during the task force deliberations. As I recall, the reasons for this last category of "inadequate consideration" can be grouped into four main sub-categories:

1. Not enough detailed consideration of innovative transit use (e.g., bus rapid transit, etc.)
2. Incomplete examination of capital adjustments to existing bridges
3. Insufficient examination of traffic light possibilities for phasing traffic
4. Incomplete consideration of adjustments to approaches and feeder streets that could avoid a new bridge entirely.

My own particular reasons in general span and fall into this last 4-part category. Although I am very appreciative (and complimentary) of the job done by the professional staff, including city personnel, ODOT personnel, and certainly CH2M Hill, the major outside consultant, I believe the task force effort evolved too much into a question of ***"Where do we want the bridge to be and what should it look like?"*** as opposed to: ***"What are the best options for handling this transportation-related land use problem here in Salem?"*** This resulted in what can be termed simply as an overly narrow scope of the task. I do not blame anyone, least of all the professional staff, for this. It was the (perhaps predictable) result of the long and sometimes tedious process of goal and objective setting, establishing evaluation and measurement criteria, etc., at the outset of the process. The natural desire to do things right and avoid major mistakes resulted in an attention to detail that may have lost the "visionary forest" for the identifiable "trees."

My recommendations at this time, therefore, begin with the simple question: ***"Compared to what?"*** It is not possible to ensure that we have truly arrived at an optimum strategy for Salem residents, Willamette Valley residents and the people of Oregon in general unless we have imagined the comparison of some preferred bridge option to some broader solutions.

Such a broader alternative would certainly include the four categories mentioned above, but should also add such items as: future gasoline and fossil fuel use – both ongoing and in construction

itself, environmental factors including specific UGB issues and broader climate change imperatives, changing land use patterns that might affect West Salem, both in its commercial "core" and the outlying residential areas, as well as the daunting task of ongoing maintenance of the newly required infrastructure and the financial pressures it would impose on the aging infrastructure in the rest of the City.

Admittedly, this would imply a visionary "future" forecasting task before we proceed. This is going to strike many as "starting over," when it seem like we have come so far and after many historic false starts. However, the rapidly changing world of energy, transportation technology, suburban development and environmental constraints, all imposed on a stringent scarcity model with public finance in general, and specifically for the City of Salem, demands that we do this. Otherwise, we risk committing a disastrously expensive mistake of imposing a 20<sup>th</sup> century solution on a 21<sup>st</sup> century problem.

We must be smarter than that.

Russ Beaton

1025 21<sup>st</sup> Street NE

Salem, Or 97301

Salem Mayor and City Council

Keizer Mayor and City Council

Marion County Commissioners

Polk County Commissioners

Polk County Planning

Re: Salem River Crossing Proposal – Case File CA 16-04

October 12, 2016

I am speaking as a rural resident and small business owner in Polk County who uses our bridges for both business and personal trips. We do not need a third bridge in Salem. The financial, ecological and even social costs are far greater than any benefit.

Recently I left Portland at 3:30 pm and spent 30 minutes bumper to bumper (no accident, just traffic) getting out of Portland. At exactly 5 pm I joined the line of cars on commercial, coming off the Parkway to cross the bridge. At 5:08 I was across the bridge and in free flowing traffic going west. Half a billion dollars, tolls and increased taxes etc. for 8 minutes – No Thanks!

A recent University of Michigan article includes the following (link below)

About 87 percent of 19-year-olds in 1983 had their licenses, but more than 30 years later, that percentage had dropped to 69 percent. Other teen driving groups have also declined: 18-year-olds fell from 80 percent in 1983 to 60 percent in 2014, 17-year-olds decreased from 69 percent to 45 percent, and 16-year-olds plummeted from 46 percent to 24 percent. <http://www.umtri.umich.edu/what-were-doing/news/more-americans-all-ages-spurning-drivers-licenses>.

I have two children with families and NO CAR. They live very happily with bikes, public transportation and their own two legs.

I have testified on this subject before, always with substantive comments, offering other less costly solutions. I have never felt heard, I have never been asked even one question, there has never been any real opportunity for dialog with city bridge supporters. So now I will speak from my heart and my gut!

You bridge folks are on the wrong side of history. When your grandchildren ask you what you were doing as climate change became more and more threatening you will get to say – “I built a big expensive new bridge so more people could drive more cars and trucks while many folks asked for bikeways and bus service and livable communities.”

I personally see this as similar to President Bush’s Iraq war. Somewhere down the line, as cost overruns add up, neighborhoods are disrupted and people drive less all

you third bridge supporters will be scrambling to figure out how you can credibly say you were actually against the bridge fiasco.

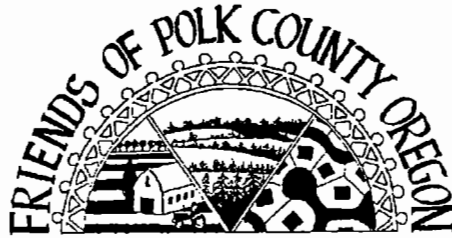
I sincerely hope this does not come to pass and you are moved to find a better solution. We and future generations will thank you.

Sincerely,

Sarah Deumling

<http://www.umtri.umich.edu/what-were-doing/news/more-americans-all-ages-spurning-drivers-licenses>.

About 87 percent of 19-year-olds in 1983 had their licenses, but more than 30 years later, that percentage had dropped to 69 percent. Other teen driving groups have also declined: 18-year-olds fell from 80 percent in 1983 to 60 percent in 2014, 17-year-olds decreased from 69 percent to 45 percent, and 16-year-olds plummeted from 46 percent to 24 percent.



October 8, 2016

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

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

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

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

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

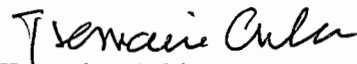
We are quite certain that when the cost of the bridge becomes clear to Polk County residents along with the possible means to pay for it resistance may well be overwhelming. Population projections supporting a new bridge must be accurate and current. If they are anything less the

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

There are at least two smarter and cheaper ways to ease congestion on the current bridge: (1) Encourage more use of flex hours for people with jobs in Salem. and (2) Improve public transportation between rural Polk County and Salem and between West Salem and Salem. The League of Women Voters published a major review of Public Transit in Polk and Marion Counties in 2012. Several relevant findings are reported. Substantial ridership fluctuations on 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



October 12, 2016

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

**FR: Joni McClintock, President  
Salem Association of REALTORS®**

Alex Rhoten, Government Affairs Chairman  
Salem Association of REALTORS®

**RE: Plan Amendment No. CA16-04/Salem River Crossing**

On behalf of the over 750 members of the Salem Association of REALTORS®, thank you for the opportunity to comment regarding the proposed third bridge over the Willamette River. We appreciate the opportunity to be heard on this important matter which affects all those who live, work, and do business in the Salem area and surrounding communities.

The Salem Association of REALTORS® urges you to adopt the proposed amendments to the Salem-Keizer Urban Growth Boundary, Salem Area Comprehensive Plan, and the Salem Transportation System Plan, as well as take an exception to Statewide Planning Goal 15 in order to *keep this project moving forward*. A third bridge is vital for the future economic growth of the area. Without a new bridge, the quality of life, and the value of homes in this area, will deteriorate. Traffic in Salem, Keizer and the surrounding area is only get worse. It will not get better until we build a new bridge that improves both regional and local mobility and connectivity.

We recognize that this has been a slow and sometimes arduous process spanning over decades, and we commend you for your work on this important matter and urge you to *keep moving it forward*.

Thank you for your time and consideration.



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*Willamette University*

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*MAPS Credit Union*

October 12, 2016

City Councils of Keizer and Salem, Commissioning Boards of Marion and Polk Counties,  
Planning Commissions of Polk County and the City of Keizer

Re: Joint Hearing regarding Proposed Ordinance 14-16, Major Comprehensive Plan  
Amendments, Salem River Crossing Preferred Alternative

Honorable Commissioners, Mayors, City Councilors and Members of Planning  
Commissions:

On behalf of the Salem Area Chamber of Commerce, representing in excess of 1,200  
members and 46,000 employees, we stand united in strong support of the proposed  
amendments to our regions Urban Grown Boundary. The organizations we are  
privileged to represent have indicated an unprecedented will to see the Salem River  
Crossing to completion for decades.

These proposed amendments are necessary not only for the potential Salem River  
Crossing Preferred Alternative, but for the efficient mobility and public safety for  
existing properties and parcels within the current UGB via Marine Drive NW. Most of the  
adjacent parcels were annexed through popular vote, with over 80% of annexation  
votes passing in the past 12 years. Bringing the road network (35 acres) into the UGB to  
support urban-zoned properties represents sound judgment and planning.

In studying the 432 page staff report, we believe that the proposed amendments  
comply with state laws and rules related to growth and UGB adjustments.

Both the planned Marine Drive NW, and its access to the Salem River Crossing are  
critical links to our future economic vitality. Global competition, as well as increased  
regulatory requirements, are demanding that producers, agriculture, wineries,  
distributors, farmers and local businesses must be able to access Interstate 5 in a timely  
and safe manner. Today's congestion, with traffic counts exceeding that of I-5 between  
Market St and Mission St, degrades our regional ability to compete and enjoy mobility  
for products and people.

In addition, commuters spend 29 hours per year in unavoidable traffic. Couple this with  
the danger of having only one current crossing site over seismically unsound facilities,  
this community can not continue to avoid this need.

We urge that you approve these amendments so that we can finalize and agree, as a  
region, what we need to compete and attain the mobility that our urban community  
demands.

Respectfully Submitted,

Dan Clem  
Chief Executive Officer



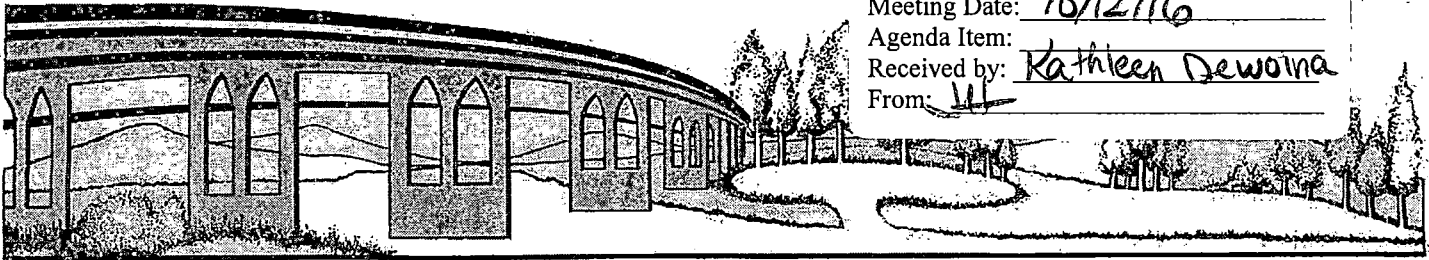
Received At Council Meeting

Meeting Date: 10/12/16

Agenda Item:

Received by: Kathleen Dewoina

From: [Signature]



# West Salem Neighborhood Association

555 Liberty Street SE Room 305 Salem, Oregon 97301 • 503-588-6207

to the surveyed version of Marine Drive, a 60-foot right of way for local access circulation with 12-foot wide bike/pedestrian boulevard from River Bend to the north to Glen Creek and 5<sup>th</sup> Street to the south.

The recent emergence of the 2<sup>nd</sup> Street Underpass proposal makes it look like destruction of the south side of Edgewater is more concrete than a “reasonably foreseeable action”. This reasonably foreseeable action is in direct conflict with the West Salem Neighborhood Plan and the recommendation of the Edgewater Study.

The West Salem Neighborhood Association respectfully requests amendments to the Transportation Systems Plan changing the character of Marine Drive from local access circulation with bicycle and pedestrian boulevard to a Minor Arterial, and connecting OR 22 to Marine Drive, be deleted from the current proposal. The matter should be vetted through the West Salem Neighborhood Plan process.

The West Salem Neighborhood Association requests the UGB changes pertaining to Marine Drive as stated in the West Salem elements of the Transportation Systems Plan be adopted separately from UGB changes for the Willamette River Crossing Preferred Alternative.

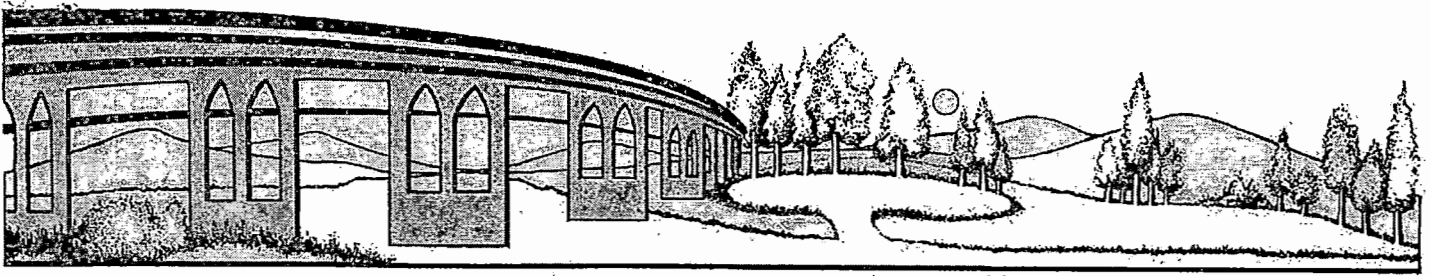
Reduced congestion on Wallace Road is a reasonably foreseeable impact of developing Marine Drive for local vehicle, bicycle and pedestrian access and circulation. Its development should be freed from the questionable economic costs and benefits of the proposed Third Bridge.

### **Economic Condemnation:**

Adopting the land use changes now with the uncertainty of funding for the proposed bridge will adversely affect the marketability of properties affected by the ROW. The timeline on securing funds for the bridge could be decades. The Preferred Alternative might not ultimately be deemed the most cost beneficial location to facilitate regional transportation. Making the land use changes ahead of funding is a taking; it starts the economic condemnation of affected properties too long ahead of ROW acquisition.

Respectfully Submitted,

Kathleen Dewoina, Land Use Chair  
West Salem Neighborhood Association



# *West Salem Neighborhood Association*

*555 Liberty Street SE Room 305 Salem, Oregon 97301 • 503-588-6207*

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

October 12, 2016

West Salem bridge supporters expect the Third Bridge to relieve congestion on Wallace Road.

Close reading of the Salem Preferred Alternative leaves little doubt that the proposal will increase congestion on Wallace Road.

The Wallace Road Corridor is a hub. The spokes are Eola, Glen Creek, Orchard Heights, Brush College and Wallace Road. Doaks Ferry is an interconnecting rim, a major arterial, offering alternative routes to the Wallace Corridor.

When there is congestion at the High School, drivers avoid it by choosing alternative spokes. When congestion is anticipated at Wallace Road, drivers avoid it by choosing Rosemont or Eola. The Rosemont/Eola option also allows drivers to avoid weaving on the bridge if their destination is south Salem.

An effective Eola interchange, a safe and effective Doaks Ferry and College Drive Interchange could significantly reduce congestion on the Wallace Road Corridor. Connecting Highway 22 to Marine Drive (creating a freeway) to connect Hwy 22 to the Salem Parkway through the Third Bridge and closing the Rosemont Exit can only exacerbate congestion in the Wallace Road Corridor.

The Salem River Crossing Draft Environmental Impact Statement Chapter 4, **Cumulative Impacts, Short-Term vs. Long-Term, and Commitment of Resources Section 4.1.5.3 Future Land Use** lists among reasonably foreseeable future actions: Removal of Commercial Properties on the South Side of Edgewater Street. This would leave just one side of the street to create the "village" ambiance that once existed in West Salem and would reduce the number of storefronts overall. This outcome would be a final stage in what has been a progressive loss of storefronts on the south side of Edgewater Street.

The proposed elements of Marine Drive south of Glen Creek Road are not a part of the West Salem Elements of the Transportation Systems Plan. The West Salem Neighborhood Association stands faithful

October 12, 2016

TO: Salem Area Local Officials

FROM: Robert Cortright, West Salem

RE: PROPOSED UGB AMENDMENT FOR THE SALEM RIVER CROSSING

I was a member of the Salem River Crossing Task Force. In addition, for 25 years, I served as the lead staff person for transportation planning issues at the Oregon Department of Land Conservation and Development. I've spent much of the last three weeks reviewing the consultant reports and proposed findings. A careful review shows that the proposed UGB amendment does not – and almost certainly cannot - meet state or local planning requirements because improving the existing Marion and Center Street bridges (Alternative 2A) and other actions will reasonably meet our area's identified transportation needs. My detailed comments are attached.

**Improving the existing Marion and Center Street Bridges (Alternative 2A) in combination with other actions identified in Salem's Transportation Plan and bridge studies can reasonably meet the region's transportation needs for the following reasons:**

- **It's reasonable because it meets the three factors that the region is required to address under land use rules.** Land use rules require that you base your decision about whether an alternative solution is reasonable considering three factors: cost, economic dislocation and operational feasibility. Improving the existing bridges (Alternative 2A) meets each of these tests: it costs significantly less, it impacts fewer homes and businesses, and, it performs essentially as well in reducing traffic congestion.
- **It's reasonable because we can afford it and because we can't afford a new bridge.** A new bridge would cost at least \$425 million. That's roughly three times as much as improving the existing bridges. The cost estimate for a new bridge is almost certainly too low because it is based on a very generalized cost analysis. The cost estimates do not clearly address earthquake risks or design standards, nor do they reflect the fact that the bridge would be built across a 50 foot deep, half-mile wide gravel pit. In addition, ODOT has a record of cost overruns on big projects. For example, between the time it was planned and built, the cost of the Woodburn interchange more than doubled from \$40 to 80 million dollars.

It's important to put \$425 million in perspective: that's as much money as the region expects to be available for all road expansion from all sources for the next 20 years. The suggestion that federal or state governments will pay for most or all of a new bridge is seriously misguided for several reasons: First, our long-term budget for road improvements already includes an estimate of how much money the region will get from state and federal sources. Second, Congress ended the practice of earmarks for transportation projects more than five years ago. Third, as for state funding, ODOT says the state highway fund has no money for new roads projects. Finally, even if ODOT had more money, it rates this part of Highway 22 as a "third tier" priority- out of four- for state spending.

- **It's reasonable because the predictions of future traffic volumes are wrong.** Studies cited in the consultant reports say that traffic models, like the one used in Salem, overestimate how bad

congestion will get if we do nothing and they over-estimate congestion relief from a new bridge. The flaw in the model is that it doesn't accurately predict how traffic volumes will change in response to congestion or a new bridge. We already have proof they're wrong: current bridge volumes are 20-25% below what the models predicted a decade ago.

- **It's reasonable because it meets state and local policies that require use of low-cost and cost effective actions before we build new roads and bridges.** The Oregon Highway Plan Major Improvements policy (Policy 1G) set priorities on how we meet transportation needs. Salem's Transportation System Plan (TSP) and bridge studies identify more than 20 low and moderate costs actions that can make the existing bridges work better but that are not currently planned. These include ramp and signal improvements, staggering state employee work hours, incident response, expanding transit service and other actions. As an example, 25% of bridge congestion is caused by crashes. Special equipment and procedures to clear crashes quickly can significantly reduce congestion, and at low cost.
- **It's reasonable because fixing existing bridges so that they withstand the coming Cascadia earthquake is a higher priority.** Without a doubt the biggest threat we face is the next Cascadia Subduction zone earthquake. The latest science tells us there is a 20% chance of a magnitude 8+ earthquake in the next 50 years. When it happens, ODOT studies say the Marion and Center Street bridges are likely to collapse. The good news is they can be fixed. In 2014, ODOT provided a rough estimate that an earthquake retrofits to both bridges would cost \$36 million.
- **It's reasonable because it's the best way to make the bridges safer in emergencies.** A new bridge is an expensive and inefficient way to improve community safety, especially since it is unlikely to be build for 20 years. Fortunately, there are a series of proven actions we can take to effectively deal with bridge closures or emergencies at much lower cost. These include developing a comprehensive emergency response plan that provides for two-way operation on the existing bridges, modifying the Union Street rail bridge so it can be used by emergency vehicles, and expanding emergency response and emergency medical services in West Salem.
- **It's reasonable because it's what other nearby cities have done.** Faced with similar choices Eugene, Albany, and Corvallis have each set aside plans for building a new bridge across the Willamette in favor of other actions including ramp improvements, promoting other modes to make existing bridges work better. The experience of these other communities shows we can reasonably meet transportation needs without a new bridge.

In summary, we have a reasonable alternative to a new bridge: widening the existing bridges and implementing other low-cost and cost effective actions will make the existing bridges safer and work better. It's not only a reasonable alternative, it's a better choice. It's better because we can afford it, because it's a better return on our investment and because it can be implemented sooner rather than later. The financial reality is a new bridge is unlikely to be built in the next 20 years. Consequently, if we are serious about reducing traffic congestion and making our community safer and more resilient from emergencies, the wisest course is to do the things we can afford to do to now and in the next 5-10 years to make the bridges safer and work better.

Attachment: SALEM RIVER CROSSING DOESN'T MEET LAND USE REQUIREMENTS

# SALEM RIVER CROSSING DOESN'T MEET LAND USE REQUIREMENTS

## **1. The proposed Salem River Crossing doesn't meet state goal and rule requirements for a UGB amendments and goal exceptions because Alternative 2a – widening the existing bridges and other actions – can reasonably meet identified transportation needs.**

The proposed Salem River Crossing proposes a UGB amendment and an exception to the Willamette River Greenway Goal. A UGB amendment is guided by Statewide Planning Goal 14 (urbanization), which incorporates the requirements of ORS 197.298. Once a need is established, the goal says:

“Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary”.

OAR 660-012-0070 describes in detail how a local government should evaluate whether there a non-exception alternative reasonably meets identified transportation needs. OAR 660-012-0070 (6) lists three factors that must be considered in evaluating whether an non-exception option reasonably meets transportation needs: “cost, operational feasibility and economic dislocation.

Consultant reports show that Alternative 2A performs nearly as well or better than the preferred alternative in meeting these three required factors:

- it costs less than the preferred alternative - \$148 million compared to at least \$425 million.
- it results in less economic dislocation of homes and businesses alternative
- it's feasible and operates just about as well as the preferred alternative

## **2. The factors and “thresholds” that are proposed to decide whether Alternative 2A is reasonable are not "relevant" or "justified"**

The consultant reports and findings proposes several factors <sup>1</sup>and thresholds to be decide whether alternatives reasonably meet transportation needs. Factors other than cost, economic dislocation and operational feasibility must be justified: i.e. local governments explain why or how the factor is relevant to determining whether transportation needs are reasonably met. In 2010, as part of its Urban Reserve rulemaking, DLCDC provided guidance on how thresholds should be identified and justified.<sup>2</sup>

The consultant-prepared Land Use Technical Report (LUTR) proposes seven factors to be used to evaluate whether non-expansion or non-exception alternatives can reasonably meet transportation needs in the study area. The staff proposed findings list of six largely similar but slightly different factors. The comments provide a combined response to the two sets of factors.

As explained below most of the proposed “other “ factors are either not “relevant” or the proposed

1 OAR 660-012-0070(6) allows local governments to address “other relevant factors” to evaluate whether a non-exception alternative would be a reasonable way to meet identified transportation needs.

2 See Attachment 1 DLCDC Guidance for Evaluating “Reasonableness” of Non-exception Alternatives

thresholds for assessing reasonableness are not “justified” or supported by substantial evidence .

***Threshold #1: Does the Build alternative reduce congestion levels at the existing bridgeheads (measured by v/c ratios at Tier 1 intersections), when compared with the No Build Alternative in 2035? (LUTR)  
Reducing congestion in downtown (Findings)***

The proposed factor and threshold is not relevant or justified for the following reasons:

- The preferred alternative, which is implicitly considered to “reasonably” meet needs does not meet this threshold at other intersections in the study area. Table 5.1-1 in the Traffic and Transportation Technical Report (TTR, page 5-2 through 5-4) shows intersection performance for the preferred alternative. (Table 5.1-1 2040 Preferred Alternative Intersection Analysis for AM and PM Peak Hours and Control Types) The traffic analysis provides 68 intersection measures - 34 intersection x two peak hours. For 16 of the 68 of the intersections measured -24% of the total - the Preferred Alternative performed worse than the no- build. For 14 other intersection, the Preferred Alternative performs worse than the no-build but meets the applicable mobility standard. <sup>3</sup> See Attachment 2 Intersection Performance, Induced Travel and Tolls.
- No basis is provided for selection of “Tier 1” intersections . The selection appears to have been arbitrary<sup>4</sup> and biased<sup>5</sup> in favor of counting intersections where the Preferred Alternative performs better. For example, minor intersection at Wallace/Taggart, which measures traffic at a collector street intersection, is considered an important “Tier 1” intersection, while the adjacent minor arterial street intersection at Wallace/Glen Creek – which is the highest volume city street intersection in West Salem - is not considered Tier 1. (This is significant because performance at Taggart is affected by capacity at Glen Creek: if Glen Creek is congested, it functions as a bottleneck, which meters flow at Taggart. In short, Taggart performs well because traffic entering or exiting Wallace at Taggart is a small volume of local traffic, and because Wallace Road traffic is limited by the capacity of the Glen Creek intersection.
- The traffic analysis which provides the basis for comparing alternatives is flawed because regional models have consistently overestimated growth in bridge volumes and do not properly account for induced travel or tolling.
  - In 2002, SKATS, the regional transportation agency, forecast that bridge traffic in 2015 would increase by 40% to 106,500 ADT.<sup>6</sup> ODOT traffic volume data since that date show bridge volumes have been essentially flat: ADT in 2011 was 84,000, 25% below the traffic levels forecast for 2015.<sup>7</sup> The technical reports neither review past forecasts nor provide updated forecasts of future bridge volumes. Lack of forecasts suggests planners have little confidence the analysis.

3 Table 5.1-1 “ 2040 Preferred Alternative Intersection Analysis for AM and PM Peak Hours and Control Types” Traffic and Transportation Technical Report (TTTR, page 5-2 through 5-4)

4 The list of “Tier 1” intersections was not part of the DEIS document or supporting reports and appears first in the updated Traffic and Transportation Technical Report dated July 2016: In order to understand traffic mobility effects at the existing bridgeheads, the traffic analysis associated with the UGB amendment (conducted for the Traffic and Transportation Technical Report Addendum (CH2M HILL, 2016)) focused on a total of twelve study intersections within the area of influence of bridge traffic.” LUTR, page 4-49)

5

6 Willamette River Crossing Capacity Study, 2002, ES-5

7 “New Bridge Defies Old Rules”, Salem Weekly, November 29, 2012

- While technical reports acknowledge the concept of “induced travel” neither the travel model nor the traffic analysis explicitly account for “induced travel”. Failure to account for induced travel means that the analysis is inaccurate and significantly over-estimates travel volumes and congestion in the no-build and under-estimates traffic volumes and congestion from a new bridge.
- The traffic analysis is also flawed because it does not consider the effect of tolling which is part of the proposed financing strategy and which would significantly reduce future volumes and congestion. (See Attachment 2 Traffic Analysis, Induced Travel and Tolls.)

Together these three defects mean that the traffic analysis used to compare alternatives is inaccurate and inadequate to provide a basis for comparing outcomes of different alternatives.

- Local plans acknowledge that significant increases in congestion are essentially unavoidable. The Salem TSP shows that the city anticipates significant congestion on large portions of the street system in 2030 and that the amount of congested streets will grow by about 700% between 2000 and 2030:

In 2000, the total amount of streets either capacity deficient (12.0 miles) or approaching capacity deficient (11.8 miles) during the P.M. peak travel period was 21.8 miles (see Table 3-3 and Map 3-3). It is forecast that if those projects included in the Build Alternative were constructed by year 2030, the amount of congested streets would increase to 83.1 miles during the P.M. peak travel period (see Map 3-4). (, Map 3-4 Street Congestion 2030 PM Peak Build) Salem TSP, July 2014, page 3-16-18.

It is important to note that even if the Salem-Keizer region is able to build all of the projects contained in the Regional Plan and many from the Salem Plan, we will still experience nearly a fourfold increase in the mileage of congested streets during the P.M. peak travel period by 2030 compared to 2000. Thus, we will be unable to build enough capacity into the system to handle all the peak hour traffic demand expected in the coming years. While it is important that these projects be built to reduce congestion, we cannot completely build our way out of congestion! Over the long term our community will need to find other means of accommodating peak hour travel demand in addition to constructing street capacity. (Salem TSP, July 2014, page 3-19. July 2014)

- It violates the OHP Major Improvements Policy (Policy 1G) which calls for implementation of “cost effective” actions and improvements before new facilities are constructed. Alternative 2A is a higher priority action which is more effective in reducing expected congestion per dollar spent than the proposed alternative. A threshold that would reject cost-effective higher priority actions called for by the Major Improvements Policy is inconsistent with the policy.
- Use of v/c ratios to define an acceptable solution is inappropriate, because the Oregon Highway Plan makes it clear that mobility standards expressed as v/c ratios are to be used for identifying problems, not for selecting solutions:

While ODOT measures vehicular highway mobility performance through volume to capacity (v/c) ratios (see Tables 6 and 7) when making initial determinations of facility needs necessary to maintain acceptable and reliable levels of mobility on the state highway system, achieving v/c targets will not necessarily be the determinant of the transportation solution(s). Policy 1F recognizes and emphasizes opportunities for developing alternative mobility targets (including measures that are not v/c-based) that provide a more effective tool to identify transportation needs and solutions and better balance state and local

community needs and objectives. Through this policy, the state acknowledges that achieving important community goals may impact mobility performance and that higher levels of congestion may result in certain areas.<sup>8</sup>

The Highway Mobility Policy applies primarily to transportation and land use planning decisions. By defining targeted levels of highway system mobility, the policy provides direction for identifying (vehicular) highway system deficiencies. The policy does not, however, determine what actions should be taken to address the deficiencies.<sup>9</sup>

- The proposed preferred alternative does not meet mobility standards at a number of intersections in the study area:

In adopting this Preferred Alternative, the City recognizes that some intersections located within the project area will not meet the City's adopted Level of Service standards as included in Street System Element, Policy 2.5. Some of the intersections on the State roadway system will also not meet the State mobility targets, for which the State proposes to adopt Alternate Mobility Targets into the Oregon Highway Plan. The City supports a greater level of peak hour congestion in order to reduce the physical impact to the surrounding neighborhoods and business districts. The following City intersections will likely experience congestion greater than the City standards in either the AM or PM peak travel period.

- Marion Street NE at Liberty Street NE
  - Market Street NE at Broadway Street NE
  - Broadway Street NE at Pine Street NE
  - Broadway Street NE at Hickory Street NE<sup>10</sup>
- To the extent this factor and threshold are relevant or justified, Alternative 2A can be revised to include other measures or actions to meet this threshold, including expanded TDM measures to reduce peak hour commuting by state employees and employees of other large employers, and improvements at specific intersections. See discussion of revisions to 2A below.

***Threshold #2: Does the Build alternative reduce vehicle hours of delay (VHD) on the surrounding state and local street system, when compared with the No Build Alternative in 2035? (LUTR)***

The LUTR report concludes that Alternative 2A determined to meet this threshold. This factor and threshold are reasonable and appropriate measure of "operational feasibility." The bridge crossing and roadways in the bridge area are part of an overall transportation system serving the entire metropolitan area. The region is properly concerned with how the whole system, rather than just one part of the system, will operate to meet transportation needs. Expanding capacity in the bridge crossing area is not reasonable or worthwhile, given the cost of the improvement (equal to the amount the metropolitan expects to be available for all capacity improvements over the next 20 years) and the fact that it is proposed to be funded in part by region-wide increases in gas taxes and vehicle registration fees.

This threshold demonstrates that Alternative 2A reasonably meets the region's transportation needs as it relates to reducing delay and congestion.

8 1999 Oregon Highway Plan,(2015), page 69

9 1999 Oregon Highway Plan (2015) page 71

10 Draft amendments to the Salem TSP Supporting the Preferred Alternative, page 5



**Threshold #3: No bridge crossing of the Willamette River shall exceed a total of 4 travel lanes in a single direction. (LUTR)**

The proposed factor (number of travel lanes on single bridge) is not relevant and the proposed threshold (four lanes) is not justified or relevant to whether transportation needs are reasonably met for the following reasons:

- The factor and threshold are based on a city TSP policy on “Arterial Street Width” that applies only to city streets and specifically excludes state highways from its terms:

The City shall limit its arterial streets to a total cross section of no more than five lanes wide. Some intersections may need to exceed the five-lane standard. State facilities and those roads classified as Freeways and Parkways may also need to exceed this standard. (Salem TSP, July 2007, page 16-3)

Alternative 2A would widen a state facility, so the city policy does not apply. In addition, the proposed TSP amendment would classify much of Highway 22 as a “freeway”.

- The proposed factor and threshold conflicts with other city policies that apply specifically to planning for the Willamette River Crossing and planning for major improvements, and the Oregon Highway Plan Major Improvements Policy. The Salem TSP includes the following policy for “Willamette River Crossings”:

The City shall work with the Oregon Department of Transportation to first identify what types of capacity and seismic improvements can and should be made to the existing Center Street and Marion Street Bridges. Secondly, the City shall work with the State and other regional jurisdictions to identify the need for additional river crossings over the next 20-40 years. If such a need is justified, the location of additional river crossings should be identified. The type of crossing method should then be determined. Finally, the method of construction and operation should be identified and pursued. (Salem TSP, July 2007, page 16-3)

By its terms, this policy, which applies specifically to the Willamette River Crossings and specifically mentions the Center and Marion Street bridges directs that the city “shall ...identify ... capacity improvements that can and should be made ...” to the two bridges. Adopting a threshold that says that a bridge of more than four lanes does not reasonably meet transportation needs, is inconsistent with this policy. The two bridges are currently four lanes in width. Addition of “capacity” ...”to” the existing bridges logically involves adding one or more lanes to the bridge.

- The factor and threshold are not justified because other communities have or have considered building bridges that have more than four lanes. The three newest major state highway bridges in the Portland metropolitan area are all more than four lanes (Glenn Jackson, Marquam and Fremont). In addition, in 1994, the City of Eugene considered widening the Ferry Street Bridge to six lanes.<sup>11</sup> DLCs guidance indicates consideration of experience in other communities is relevant to determining “reasonableness:

In evaluating what measures are reasonable as options, the city/county should consult with ODOT about experience with similar roadway or highway improvement projects in communities around Oregon. Other built projects effectively provide on-the-ground evidence of what constitutes a reasonable practice in terms of acceptable cost, community

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11 Oakway Road to East Broadway (Ferry Street Bridge) Draft EIS, August 1993, page 2-4.

dislocation, or compromises to optimal transportation access or mobility<sup>12</sup>.

- The factor and threshold are not justified because at least one other roadway in Salem has been widened to more than four lanes. The Mission Street between Interstate-5 and Airport Road, including the Mission Street overpass on I-5 has been widened to six travel lanes.
- The preferred alternative is inconsistent with the proposed threshold because the proposed bridge would be wide enough to accommodate restriping for six travel lanes.<sup>13</sup> And the city is not proposing to adopt plan or zoning restrictions that would limit the UGB expansion and exception to the proposed 4 lane bridge.<sup>14</sup>

***Threshold #4: Does the Build alternative result in a “net” increase in the number of connections (for all modes) across the Willamette River? (LUTR)  
Enhancing multimodal connectivity (Draft Findings)  
Distributing traffic within the transportation system (Draft Findings)***

Connections Generally

The factor is not relevant and the proposed threshold is not justified for the following reasons:

- The underlying objective is to meet transportation needs by providing a system of transportation facilities and improvements that meets needs to move people and goods within the planning area consistent with Goal 12 and TPR 0030. The consultant reports and findings do not show that the number of connections that are provided across the river makes a significant difference in whether transportation needs are met. It oversimplifies by saying that more connections are better than fewer connections. The real question is not the number of cross-river connections, but rather whether the transportation system and planned facilities adequately provide for safe and convenient access across the river. The analysis supporting this proposed factor and threshold does not explain how an additional bridge, by itself, is necessary to reasonably meet transportation needs, or demonstrate that transportation needs cannot reasonably be met with fewer connections that have additional lanes or additional facilities for transit, or bicycle or pedestrian access across the river.
- The number of bridge crossings the currently exist in other Willamette Valley cities is does not a reasonable basis for determining whether transportation needs are reasonably met. The number of bridges that each community has are a reflection of unique geographic setting, development patterns and past investment decisions. As the city's findings indicate: “Every community is unique and it is not possible to apply a “one size fits all” approach to the issue of the magnitude of a major new bridge crossing.”<sup>15</sup>
- The experience of communities in considering adding new bridges to address transportation needs is a relevant factor that should be considered in deciding whether an entirely new crossing is a necessary action to reasonably meet transportation needs. In four situations in

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12 Memo from Richard Whitman, DLCD Director to LCDC, August 20, 2010, September 1-2, 2010 LCDC Meeting, Agenda Item 9 - Attachment G

13 The Traffic and Transportation Technical Report indicates that the cross-section of the preferred alternative would include 8 and 10 foot shoulders, which could easily be reconfigured to provide three 12-foot wide travel lanes in each direction. (TTTR, pages 1-2, 1-6) For comparison, the existing bridges have shoulders that are 2 to 4 feet wide.

14 The city proposes a Park and Open Space zone which does not limit transportation facilities. Findings, page 108.

15 Draft Findings, page 90

the last 40 years, Willamette Valley communities, including Salem, have considered adding new bridges and decided either not to add a new bridge or to instead expand capacity of existing bridges or take other actions to address transportation needs.

- In the late 1970s, Salem studied bridge crossing options and instead decided to replace Center Street Bridge and expand Marion Street Bridge and make other improvements rather than construct an additional bridge.<sup>16</sup>
- In 1994, Eugene considered options for a new or expanded bridge across the Willamette River in downtown Eugene to supplement or replace the Ferry Street Bridge. Among the options considered was a new four lane bridge at Moss Street.<sup>17</sup> The city rejected the proposal for a new bridge and instead implemented improvements at ramps and approaches to the Ferry Street bridge to maximize its capacity to move traffic.
- In 2007-2008, Albany proposed a new Willamette River bridge that would be located outside the city's UGB as it prepared its transportation system plan for the year 2030. Like Salem, Albany currently has two bridges that cross the Willamette River in the downtown area that are experiencing peak-hour congestion. The city decided not to include a new bridge in its plan and instead decided to pursue other improvements to improve traffic operations. (Albany 2030 Transportation System Plan, February 2010, page 47)
- In 2015, the Corvallis Area MPO reprogrammed money for environmental studies for a planned new bridge that would replace or supplement the Van Buren Bridge and instead used the funds to make improvements to existing roadways to improve traffic flows in the bridge area. City plans have identified the need to replace or supplement the Van Buren Bridge since 1996.

Each of the four cases cited above also demonstrates that transportation needs can be met without an additional bridge or route to “distribute” traffic across other routes. Benefits of an additional route to distributing traffic are likely to be overwhelmed by the fact that new routes will induce additional traffic, which is not accounted for by the SKATS model.

### Bicycle and Pedestrian Connections

The LUTR and draft findings argue that Alternative 2A would not meet this threshold, in part, because the widening of the Marion and Center Street bridges in Alternative 2A would reduce the number of bicycle and pedestrian crossings of the river.

Alternative 2A would ... would eliminate two bicycle and pedestrian connections across the river relative to existing conditions. Therefore, Alternative 2A would result in a “net” decrease in the number of connections (for all modes) across the Willamette River and would not meet Threshold #4. By comparison, the preferred alternative would retain the bicycle and pedestrian facilities on the existing bridges and would add bicycle and

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16 A 1974 study considered six options including one at Pine Street and concluded “... no new crossing alternative was satisfactory. Each had its trade-offs. All had extensive impacts and costs ...” The report stated: “No alternative emerged as a majority choice. Estimated costs for a new corridor also proved far in excess of available funds. Hence, the proposal for building a new bridge in a new corridor was abandoned...”

• A 1982 study concluded: “It should be noted that the issue of bridge capacities is more complex than totaling the number of crossings. Actually, it is not the bridges per se but the capacity limitations of the abutting signalized intersections ...”

17 Oakway Road to East Broadway (Ferry Street Bridge) Draft EIS, August 1993, page 2-4.

pedestrian facilities at the new bridge crossing location. Therefore, the preferred alternative would result in a “net” increase in the number of connections (for all modes) across the river and would meet Threshold #4. (LUTR, page 4-3)

The proposed factor and threshold are not justified or appropriate for the following reasons:

- As described above, the threshold measures only the number of connections provided and not whether the connections provided adequately accommodate the needs pedestrians and cyclists crossing the river. The Union Street Rail bridge is in close proximity to the existing Center and Marion Street bridges and may reasonably accommodate bike and pedestrian travel between West Salem and downtown without significant out-of-direction travel.
- The existing bicycle and pedestrian facilities on the Marion and Center Street Bridges as “minimally adequate” and “substandard” and do not meet the Highway Design Manual standards (DEIS, Chpt 3, Traffic and Transportation, 3-17) Therefore, eliminating or improving them is a wise safety move.
- To the extent that this factor or threshold are reasonable, the deficiency in Alternative 2A could easily be remedied by adding bike and pedestrian facilities to the Marion and Center Street bridges when they are widened. In fact, compliance with the state “Bike Bill” requires that facilities needed to accommodate bike and pedestrians be provided whenever a road or highway is constructed or reconstructed.<sup>18</sup>
- By contrast, the preferred alternative would provide an additional connection but one with very little benefit to pedestrians or cyclists, because the bridge would be long and not connect to significant destinations. For pedestrians and cyclists the new crossing would be a mile long “bridge to nowhere” - providing a long, unpleasant, out of direction route across the river that does not provide a convenient connection between likely destinations. As the findings note: cyclists are sensitive to out of direction travel and likely to use existing bridges.<sup>19</sup>

***Threshold #5: Is the Build alternative consistent with objectives outlined in adopted urban renewal plans for the Downtown and Edgewater/Second Street areas? Would it support and reinforce substantial public investments that have already been made to enhance the viability and livability of these urban renewal areas? (LUTR) Supporting planned land uses in Downtown Salem/Edgewater area. (Findings)***

The proposed factor and threshold are not relevant or justified for the following reasons:

- There is little or no direct analysis or evidence to justify this factor. Instead, the consultant report acknowledges that the factor is “qualitative”.
- Analysis to support this factor is based on the assumption that differences in traffic volumes will have significant effects on the implementation of adopted plans. The consultant reports provide no expert studies or literature or other analysis to support this assertion.
- The difference in traffic volumes between the proposed alternatives is slight. In essence, the LUTR argues that alternative 2A does not perform reasonably because there would be a slight increase in traffic across the Marion and Center Street Bridges in the AM/PM peak hours, of 600 to 800 vehicles during either the AM or PM peak hour. (LUTR at page 4-6) The LUTR does nothing to explain how this minor difference in estimated traffic volumes makes alternative 2A unreasonable, or would have specific adverse effects on implementing adopted

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18 ORS 366.514 <http://www.oregonlaws.org/ors/366.514>

19 Draft Findings, page 101

urban renewal plans or reinforce existing investments.

- As noted elsewhere, the traffic analysis developed to compare alternatives is flawed, and underestimates traffic volumes and congestion from the preferred alternative because analysis does not properly account for induced travel that would result from construction of additional road capacity. Consequently, to the extent traffic volumes or congestion are a reasonable test for supporting implementation of existing plans, the analysis does not provide evidence to support the conclusion that traffic congestion would be significantly improved in preferred alternative.
- City plans adopted since bridge crossing planning began in 2006 which express support<sup>20</sup> for a new bridge are not relevant because other plan policies make it clear that the city had not made a land use decision to authorize a new bridge, that this SRC process would be used to inform the decision, and that subsequent plan amendments would be needed to authorize the bridge. The city's TSP and regional transportation plan make it clear that the SRC is a proposal, not a planned transportation facility and identify the need for a goal exception and plan amendments to allow the proposed improvements.

There are good reasons to believe that the preferred alternative will work *against* achieving adopted plans for downtown and Edgewater areas:

- The construction of the preferred alternative is likely to increase accessibility between West Salem, Keizer and Interstate 5. This improved accessibility is likely to allow and encourage additional trips to shopping, services and employment areas along I-5 and in Keizer rather than downtown or West Salem. Easy access to other areas will reduce the likelihood of businesses locating or expanding in downtown or West Salem.
- A significant impact of the Preferred alternative is elimination of the Rosemont exit, westbound on Highway 22. As a result, more drivers will exit to Edgewater, drive through the Edgewater/Second street area, to get to Eola Drive and up into the hills. The alternative is to turn onto Wallace Road, and then head west up Glen Creek or Orchard Heights. The Preferred Alternative will increase drive through traffic in these areas. In addition, as noted above, the traffic analysis in the TTTR is not reliable because it does not address the factor of induced travel. The expert study cited in the TTTR concludes that traffic analysis, like those used in this study, that fail to properly account for induced travel are likely to overestimate traffic volumes and congestion in the no-build and under-estimate traffic volumes and congestion of build alternatives.
- Preferred alternative will work against implementing adopted plans because, if it is funded, it will use up most of the region's available transportation funding for a single project— bridge is estimated to cost \$425 million and region estimates available funding for capacity expansion projects for the next 20 years at \$450 million. Funding committed to construct a new bridge will reduce money available for other important transportation improvements which are also important to implementing plans for downtown, West Salem and the rest of the metropolitan area.
- Part of the funding plan for the preferred alternative is charging a \$1.50 toll for vehicle trips across the river. Imposition of a toll will hurt downtown businesses and West Salem businesses that serve customers or clients on the east side of the river.

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20 For example, the LUTR says the city's plans "... presume the need for a third bridge not widening of the existing bridges, based largely on the identification of the Tryon/Pine corridor as the priority corridor in the SKATS RTSP and the Salem TSP." (LUTR at 4-6)

- The preferred alternative will also undermine efforts to support development in downtown and West Salem because local state and federal funding constraints make it unlikely that the bridge and supporting improvements will be constructed in the next 10-20 years or more. The decision to build a third bridge means that the region will have decided to defer or not to implement other cost-effective actions that could expand traffic capacity of the existing bridges or reduce congestion. Not implementing these other actions will result in more traffic congestion in the bridge areas which will, if the LUTR analysis is correct, frustrate implementation of the adopted plans for downtown and West Salem.

**Threshold #6: Is the Build alternative consistent with Policy 1.8 of the Salem TSP? (LUTR) Providing alternate routes for emergency responders and regional trips (Findings)**

***Policy 1.8 Transportation System Redundancy***

The City's street system shall be planned and constructed to provide multiple routes between locations, including making reasonable efforts to eliminate existing, and prevent creation of new, transportation chokepoints, both natural and man-made.

The proposed factor and threshold are not relevant or justified for the following reasons:

- The underlying proposed factor is to "accommodate emergency response vehicles in the event of restricted access to and or closure of the existing bridges because of an emergency or other incident..." (LUTR at 4-6) The LUTR then proposes that Policy 1.8 "Transportation System Redundancy" be used as a threshold for determining whether the need for "emergency response" is adequately addressed.
- Policy 1.8 is too general to justify or explain why redundancy (i.e. additional bridge) is a relevant threshold for in determining whether or not transportation needs are reasonably met. Redundancy, in this case, the provision of more than one route, is a method or means of providing adequate emergency response. As a local observer commented on this argument:

"I just don't see how adding to the numerical count of bridge crossings at all substantively addresses the core question whether the transportation need can be met inside the UGB with additional lanes and other mobility. The "transportation need" is about moving people, not about counting bridges.

Even our MPO recognizes this:

A performance measure that focuses solely on the reliability of vehicular travel time in such a setting is potentially directing investment that could damage the urban fabric of the area and diminish the livability along the corridor.

"... the "transportation need" is about moving people, not about adding redundancy. I'm not sure this is a substantive argument either. And it doesn't address the cost/benefit of redundancy. Cheap redundancy is a terrific thing; tremendously expensive redundancy might just be redundant and superfluous."<sup>21</sup>

- Policy 1.8 itself does not justify a strict redundancy standard as a threshold because it requires only that "reasonable efforts" should be made to eliminate or prevent so-called chokepoints.

***Policy 1.8 Transportation System Redundancy***

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21. Salem Breakfast on Bikes, <http://breakfastonbikes.blogspot.com/2016/09/can-widening-existing-bridges-meet-transportation-need-avoid-ugb-expansion.html#more>

The City's street system shall be planned and constructed to provide multiple routes between locations, including making reasonable efforts to eliminate existing, and prevent creation of new, transportation chokepoints, both natural and man-made. (LUTR, page 4-7)

- Policy 1.8 does not provide a clear justification for the redundancy standard because it is a general direction to the city in the planning of its street system and does not specify or justify any particular amount of “redundancy”. Redundancy simply means more than one option. To the extent there is a need for more than a single option, there are currently two bridges – the Marion and Center Street bridges – which provide “redundancy”.
- Redundancy is not justified because other cities and urban areas that span major rivers are able to meet transportation needs, including the need for emergency response, without providing redundant bridges. Examples include: Albany, Wilsonville, Newport, Waldport, Florence, Lincoln City.
- As detailed above, other cities, including Eugene, Corvallis, Albany, as well as Salem, itself have over the last 20-30 years decided to implement solutions other than new bridges to meet growing transportation needs, including the need for emergency response.
- The primary purpose or benefit of redundancy / of an additional Willamette River bridge crossing would be to “reduce vulnerability in the event of an emergency or disaster” including a Cascadia Subduction Zone earthquake. Various actions and improvements that are affordable and cost-effective can achieve the benefits of redundancy to respond to an emergency or disaster. These include:
  - seismic improvements to the Marion and Center Street bridges to reduce or avoid the likelihood of a bridge closure
  - development of an updated and expanded emergency traffic plan to provide for temporary two-way operation of each of the existing Marion and Center Street bridges<sup>22</sup>
  - modification to the Union Street Rail bridge to allow for emergency vehicle access<sup>23</sup>
- The argument that temporarily converting the existing Marion and Center Street bridges to two-way operation is overly complex is not convincing. As the findings note, the city has an emergency response plan that can convert the bridges to two-way operation within three hours. The city does not explain why a more rapid implementation is necessary to reasonably meet emergency or temporary closure needs. The argument that the conversion is overly complicated is contradicted by experience in Portland. In 1997, ODOT closed the northbound portion of the I-5 Interstate bridge for five days and implemented a traffic management plan that provided two-way operation on the southbound span. This included a reversible lane, that provided two lanes of travel in the peak direction.<sup>24</sup> If Portland can develop a traffic

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22 The city's proposed findings indicate that the city and ODOT developed a plan for converting each of the bridges to two-way operation in the event of a bridge closure in 2007. The plan involves use of cones, signs, barriers, flaggers and reader boards to redirect traffic and would take three hours to implement. (Findings, p 19-20) This existing plan is modest and 9 years old. A more ambitious plan could include installation or modification of traffic signals and pre-positioning of signs and equipment to speed up conversion.

23 The city's proposed findings indicate that conversion of the Union Street bridge to provide for emergency vehicle access is feasible: “This bridge provides an opportunity to enhance river crossing and emergency vehicle response in the event of a prolonged closure of one of the bridges.” Findings, page 20

24 W.P. Ciz, “I-5 Columbia River Bridge Trunion Repair Project Traffic Management Plan”, ITE Journal, 1998-99

management plan the reroutes traffic crossing the Interstate bridge, it seems more than reasonable to expect that Salem could develop a similar plan for the Marion and Center Street Bridges. While such plans may be “complicated” the findings do not explain why such plans would not reasonably meet transportation needs in an emergency or bridge closure.

- Providing an alternate route for regional trips is not compelling for several reasons:
  - The need is not significant because only a small percentage of trips are “regional trips” that will benefit from the revised route. The 2002 study indicates:

While traffic originating from areas west of the river outside of West Salem is significant (37 percent of the total traffic) not more than 3.5 percent of these trips are through trips. The overwhelming majority of trips are destined for locations within Salem and Keizer east of the river. Thus, through traffic that would most benefit from a regional bridge directly connecting Highway 99W with I-5 makes up a relatively small portion of the user market for the bridges. Consequently, accommodating the predominant travel pattern of internal trips remains the major criteria for any additional bridge solution and reinforces the need for a local service bridge near the core area. Such a location would maintain accessibility to both the commercial-employment center of Salem as well as the remainder of the Salem-Keizer area ...<sup>25</sup>
  - Similarly, a 2014 analysis of Census data by SKATS staff shows that only 2% of workers from Dallas/Independence and Monmouth, and 5% of workers from West Salem are regional commuters (i.e. that commute to North Marion County and the Portland metropolitan area).<sup>26</sup>
  - Because regional trips are longer trips, the proposed “alternate” route is not significantly different than the existing route – basically shifts traffic one mile north to the new bridge. This is a minor change for regional trips of 10 to 50 miles.
  - Transportation needs for regional trips are adequately met outside of peak hours. Nothing in the consultant reports or findings indicates that the new bridge will be a faster route for regional trips in off peak hours than the existing bridges. Much or most regional traffic occurs in off-peak hours, and it is reasonable to expect that discretionary regional trips that are sensitive to congestion can shift to off-peak hours.
  - The preferred alternative will not significantly improve conditions for regional traffic because overall traffic congestion in the Salem-Keizer area will be roughly the same with or without the new bridge: Consultant reports estimate that in the “no-build” congestion will increase by 362% and with a new bridge, congestion will still increase by 342%
- The proposed redundancy threshold violates Oregon Highway Plan Major Improvements Policy because it would implement a lower-priority action (constructing a new bridge) when there are a cost-effective, higher priority actions, including development of an improved emergency traffic plan, and upgrading the existing Marion and Center Street bridges to reduce the likelihood of a bridge closure do to an earthquake or other event. Construction of a new bridge is a high cost solution - \$425 million – to a rare or unlikely event. By comparison, an updated and expanded bridge closure traffic management plan would involve a modest investment.

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<https://trid.trb.org/view.aspx?id=541289>

25 Willamette River Crossing Capacity Study, 2002, page ES-6

26 SKATS Memo to ECO Northwest, October 13, 2014



- The preferred alternative is not consistent with Policy 1.8 because it involves an “unreasonable effort” to prevent or remove a chokepoint because it is unreasonably expensive. Alternative 2A is estimated to cost \$148 million. The preferred alternative would cost \$425 million, an amount that roughly equals the amount of funding the metropolitan area expects to have available for capital projects over the next 20 years.<sup>27</sup> Even if we consider additional improvements to 2A, the preferred alternative would still be grossly more expensive.
- The preferred alternative will not meet this threshold because, due to funding constraints, it is unlikely to be constructed during the 20-year planning period. Again, the preferred alternative is estimated to cost \$425 million – roughly the same amount that the region expects to have for all roadway expansion projects over the next 20 years. This makes it unlikely that the project will be built in the planning period, and means that emergency response during all or most of the planning period will not be improved. An updated and expanded bridge closure plan would involve a modest investment and could be completed and in operation in two to four years. It would be more cost-effective to invest in redundant emergency response capabilities in West Salem, such as urgent medical care clinics and additional fire stations or equipment so that access to emergency services is less dependent on bridge crossings.

**3. To the extent the other proposed factors and thresholds are either relevant or justified, Alternative 2A can be modified to perform reasonably to meet the proposed factor or threshold.**

Alternative 2A is a relatively narrowly drawn set of actions for addressing transportation needs within the existing UGB. Bridge studies and adopted plans identify a series of other actions and improvements that can and should be added or to Alternative 2A so that it would reasonably meet transportation needs.

Proposed Refinements/Additions to Alternative 2A

The following table identifies 20+ additional actions or refinements that should be added to Alternative 2A. Each action or refinement will improve its performance in meeting proposed factors” and “thresholds” particularly as it relates to reducing traffic congestion and improving emergency response during bridge closures.

Additional consideration of these refinements and actions is warranted for the following reasons:

- Professional literature and adopted plans indicates that the proposed actions are feasible and effective in improving transportation system performance.
- Most of the proposed actions and refinements are identified or recommended in the Salem Transportation System Plan as ones the city supports, (i.e. considers feasible, desirable and effective) but which have not been adopted as “planned” projects to be implemented in the next 20-25 years.
- Most of the actions are low-cost and cost-effective actions compared to a new bridge. As noted elsewhere, the OHP Major Improvements Policy and the city’s plan direct that modest, cost-effective actions and improvements to existing facilities be implemented prior to construction

<sup>27</sup> The Regional Transportation System Plan (RTSP) for 2015-2035 indicates that expected 20-year revenue for city, county and state road capital projects is \$425 million. RTSP, Table 4-4, page 4-15.

of major new facilities. Incorporating these additional actions and refinements into Alternative 2A would implement the OHP Major Improvements Policy and the city's plan.

- DLCD guidance indicates that non-exception/non-expansion alternatives should be refined and revised so that they work as well as possible, and that the process for developing and evaluating alternatives should be iterative:

In assessing non-exception alternatives, the city/county should take care to incorporate reasonable design and mitigation measures that would make nonexception alternatives as workable as possible. As a practical matter this is an iterative process: the city/county should outline major alternatives, then identify their apparent deficiencies or shortcomings, and then assess what modifications to design or alignment (or addition of mitigating measures) might lessen or offset the perceived disadvantages while trying to maintain most or all of its fundamental functionality.<sup>28</sup>

- It is reasonable to significantly expand Alternative 2A because it costs substantially less than the Preferred Alternative (PA). As noted above, Alternative 2A is estimated to cost \$148 million, while the Preferred Alternative is estimated to cost at least \$425 million.
- Several of the proposed additional actions were considered but excluded from Alternative 2A without good reason and/or warrant additional consideration. As noted above, guidance from DLCD indicates that evaluation of non-exception alternatives should be iterative – when an alternative is found deficient, it modifications or refinements should be considered that would make the alternative work as well as possible.

<b>Additional Actions/Modifications to Alternative 2A</b>		
Alternative 2A should be revised and expanded to include the following actions to improve its performance in meeting proposed factors” and “thresholds” particularly as it relates to reducing traffic congestion and improving emergency response during bridge closures. Most are identified in the Salem TSP as ones the city supports, (i.e. considers feasible, desirable and effective) but has not adopted as planned projects to be implemented in the next 20-25 years. The OHP Major Improvements Policy and the city's plan direct that cost-effective actions be implemented prior to construction of major new facilities.		
Action	Plan/Policy Support	Comments
<b>Roadway Improvements</b>		
Improve Center Street Bridge to Northbound Front Avenue ramp	1998 Bridgehead Engineering Study Recommendation	More detailed evaluation and further refinement is warranted – see above
Modify Union Street Rail Bridge to allow emergency vehicle use during bridge closures	(Identified in SRC DEIS)	Improved emergency response.
Seismic retrofit/upgrade to Center and Marion Street Bridges	City application to ODOT for Center Street Bridge study; RTSP	Reduce or eliminate likelihood of a bridge closure due to a Cascadia earthquake
<b>Transportation System Management (TSM) Actions</b>		
Note: City TSP supports actions in Table 4-2 but does not indicate any will be implemented in the next 25 years.*		
Prepare and implement an incident management plan for the West Salem Bridges	Salem TSP, Table 4-2* Salem-Keizer ITS Plan <sup>29</sup>	Improved emergency response. Crashes and incidents are responsible

28 Memo from Richard Whitman, DLCD Director to LCDC, August 20, 2010, September 1-2, 2010 LCDC Meeting, Agenda Item 9 - Attachment G

Expand incident response staff and equipment for bridge area		for about 25% of traffic congestion. <sup>30</sup> 2007 plan for bridge closure is minimal, lacks resources
Central signal system upgrade	Salem TSP, Table 4-2* TSM Policy 1.1	Comprehensive signal upgrades can increase traffic flow by up to 25% <sup>31</sup>
Implement ITS-Adaptive Signal Timing Project	SKATS RTSP, Appendix I <sup>32</sup> TSM Policy 1.1	
Transit signal priority (on Wallace Road, Center and Marion Streets through downtown area)	Salem TSP, Table 4-2* TSM Policy 1.1	
Dynamic routing of emergency vehicles	Salem TSP, Table 4-2*	Improved emergency response. Speeds clearance of crashes and incidents which are responsible for about 25% of traffic congestion <sup>33</sup>
Traffic signal preemption by vehicle ID	Salem TSP, Table 4-2* TSM Policy 1.1	Improved emergency response times
En-route traveler information (Dynamic message signs)	Salem TSP, Table 4-2*	Reduce congestion support use of alternative routes
Add/ modify traffic signals and add variable message signs to allow for rapid conversion of Center and Marion Street bridges to two-way operation		Specific element of incident management plan for the West Salem bridges. Improved emergency response
<b>Transportation Demand Management (TDM) Actions</b>		
Work with state and major employers to stagger work hours, promote flexible schedules and work at home to reduce peak-period commutes	Salem TSP, Policy 2.2 and 2.4 <sup>34</sup>	Bridge studies indicate significant potential to reduce peak hour travel <sup>35</sup>
Work with major employers to provide free transit passes	Salem TSP Policy 3.1 <sup>36</sup>	Extend existing program for state

\*"Table 4-2 Additional ITS Projects and Strategies Supported by the City of Salem", Salem TSP, February 2016, page 4-15) "The City also supports implementation of other strategies (See Table 4-2 but does not anticipate programming significant capital funds toward these within the 25-year planning period.

29 "Incident Management Plan for West Salem Bridges" \$1.1 million

30 Salem-Keizer ITS Plan, August 2005, page 4- Estimates a 15% reduction in average incident duration and 35% reduction in vehicle hours of incident delay.

31 Salem TSP, TSM Element, February 2016, page 4-10

32 RTSP Project S277 "ITS – Adaptive Signal Timing Project. Deploy adaptive signal timing on selected corridors with the highest levels of congestion and the most fluctuation in volumes. \$1.4 million. Unfunded. RTSP, June 2016, page I-11

33 Salem-Keizer ITS Plan, August 2005, page 1

34 Policy 2.2 Increase Marketing to Employers. The City shall support the regional TDM programs efforts to provide assistance to employers in designing and implementing trip reduction plans at their work sites. Trip reduction plans will include strategies to encourage employees to use alternative transportation modes and discourage them from commuting in single-occupant vehicles. Alternative work hours and teleworking will also be recommended as a way of reducing peak hour congestion.

Policy 2.4 Encourage State Agencies to Reduce Peak Hour Travel Demand. The City of Salem shall encourage the State of Oregon to implement, through its agencies, significant measures that will reduce peak hour travel demand on Salem's street system.

These measures should include the widespread institution of flexible work schedules, increased carpooling, vanpooling, teleworking and transit ridership. Salem TSP, February 2016, page 10-3

35 Willamette River Crossing Capacity Study, 2002: "Recent work site surveys conducted through the Regional TDM Program indicate that employees are most interested in both compressing work weeks and telecommuting options. Over 40 percent of the surveyed SOV employees indicated that if they had the option, they would work at home at least one day a week. Just over 20 percent of those persons surveyed stated they would try compressed work weeks."

36 Policy 3.1 Transit Ridership Incentives The City shall support efforts of the Salem Area Mass Transit District to increase commuter transit ridership through voluntary employer-based incentives such as subsidized transit passes and guaranteed ride home programs. Salem TSP, February 2016, page 9-4

for commuters		workers to other employers
Work with other government agencies to charge for employee parking	Salem TSP Parking Policy 4.3 <sup>37</sup>	
Add a \$1 toll to recover costs for widening Marion and Center Street bridges	Funding Strategy for the Preferred Alternative <sup>38</sup> 2002 Crossing Capacity Study <sup>R391</sup>	Tolls significantly reduce expected traffic volumes <sup>40</sup>
Change city 10 hour meters to provide reduced rates to arrivals before peak hour		Early bird parking reduces peak hour traffic congestion
Adopt a program for city and county employees to reduce peak hour travel	Salem TSP, Policy 5.2 <sup>41</sup>	
<b>Transit Service Improvements</b>		
Provide /restore fixed route transit service to West Salem neighborhoods (Eola, Glen Creek and Orchard Heights) with 15 minute peak hour service	Salem TSP Policy 2.2 <sup>42</sup>	Expanded transit service, in combination with free passes and parking charges can significantly reduce drive alone commuting
Provide park and ride lots at Edgewater, Independence-Monmouth, Dallas		
Add bus queue jump signals on Wallace Road at Orchard Heights, Glen Creek, Taggart, Edgewater	Salem TSP Policy 2.6 <sup>43</sup>	Improves speed and reliability of transit service
Expand CART service to provide Express bus service at 15 minute intervals during peak hours and Dallas, Independence & Monmouth	Salem TSP Policy 2.4 <sup>44</sup>	
Provide Cherriots express service between Park and Rides and Capitol Mall/downtown Salem	Salem TSP Policy 2.4 <sup>45</sup>	
<b>Bicycle and Pedestrian Improvements</b>		
Include bikeway/walkway connection as part of reconstructed Marion and Center Street Bridges	ORS 366.514	Improved bicycle and pedestrian connectivity between West Salem and Downtown

37 Policy 4.3 Pricing of Other Publicly-owned Parking Facilities The City will encourage other Federal, State, regional, and local government agencies to charge their employees for parking at their facilities in Central Salem and at other locations in the City that are on or near transit routes. Salem TSP, February 2016, 11-5

38 Project Funding Strategy Memorandum, March 6, 2015

39 Willamette River Crossing Capacity Study, 2002, ES-26 "The state may have the authority to ... implement tolls as part of a major reconstruction project for existing federally aided bridges. One strategy would be to apply to the FHWA to allow tolls on the existing Marion and Center Street bridges and/or the Highway 22 and Wallace Road Corridors.

40 ECO Northwest, Salem River Crossing Revenue Projections Memorandum, November 12, 2014

41 "Policy 5.2 Reduce Peak Hour Travel Demand. The City shall implement measures directed at City employees that will reduce peak hour travel demand on Salem's street system. These measures should include the widespread institution of flexible work schedules, increased carpooling, vanpooling, teleworking and transit ridership." Salem TSP, February 2016, page 10-4

42 Policy 2.2 Increased Frequency and Availability of Services The City shall support attempts made by the Salem Area Mass Transit District to increase the frequency of transit services (shorter headways), extend its hours of operation, and provide weekend service.

43 Policy 2.6 Transit Priority The City shall work with the Salem Area Mass Transit District to implement the latest transit priority technology to facilitate transit service efficiency. Salem TSP, February 2016, 9-4

44 Policy 2.4 Express Transit Service The City shall support the Salem Area Mass Transit District's express transit services to and from outlying park-and-ride facilities and the central core area of Salem.

45 Policy 2.4 Express Transit Service The City shall support the Salem Area Mass Transit District's express transit services to and from outlying park-and-ride facilities and the central core area of Salem.

Union Bridge Path Extension Add grade-separated crossing of Wallace Road from Union Street railroad path to 2 <sup>nd</sup> Avenue	Planned Project in Salem TSP <sup>46</sup>	Improve bike pedestrian connectivity across Wallace to Edgewater Reduced congestion on Wallace
<b>Other Actions</b>		
Expand emergency services in West Salem including additional fire equipment, expanded urgent medical care capability and emergency medical evacuation		

<sup>46</sup> Tier 1 Projects, Salem TSP Pedestrian Element, February 2016, page 8-28, \$1.574 million

**Table 4-2. Additional ITS Projects & Strategies Supported by the City of Salem**

Project/Strategy Title	Project/Strategy Description
Incident Management Plan for West Salem Bridges	Provide traffic management and traveler information tools (cameras, advisory radio (HAR), moveable barriers, transit vehicles) and specific pin outlining roles, responsibilities and procedures for handling an emergency bridge closure.
Incident Response	Build on current ODOT incident response program to support incident management on state, county and city roadways. Equip incident response vehicles with GPS to enhance dispatch. Provide additional incident response vehicles and personnel.
Detour Route Management	Includes the mapping of detour route plans in GIS, incident signal timing plans, electronic message signs, and congestion monitoring to support incident responders and management of the roadway network during incidents. This includes improving communications to field devices (traffic signals, vehicle detectors, message signs and cameras). High priority will be given to Kuabier Boulevard S/Cordon Road, and Salem Parkway/Commercial Street/Liberty Road corridors.
Arterial Congestion Map	Create a congestion map that shows actual travel speeds on roadways throughout the region.
Advanced Rail Warning System	Deploy railroad crossing detection to determine rail crossing occupation and duration at crossings. This information can be used by emergency service providers and motorists to avoid those crossings and use an alternative route.
Central Signal System Upgrade	Upgrade the central computer control to provide additional functionality including advanced signal control, camera control, automated incident response timing plans and arterial congestion mapping.
Flood Warning System	This project will monitor rising water on roadways and alert transportation managers of high water.
Advanced Vehicle System	Deploy Mayday system information from vehicle to Traffic Control Center (e.g. air bag deployment) and from roadside to vehicle (e.g. transmit traveler information).
Isolated Intersection Safety Warning System	Deploy devices at high crash locations that warn drivers of changing conditions (e.g. tee intersections or sharp curves).
En-route Traveler Information	Dynamic message signs, websites and HAR would notify motorists of incidents, detour routes, construction, and other traveler information.
Cable TV Traveler Information Channel	Provide camera images and other traveler information to cable TV companies to display on a channel.
Broadcast Traveler Information	A dedicated traffic condition radio channel will be provided.
Interactive Traveler Information	Allow the motorist to request specific traveler information, utilize dynamic ridesharing and provide yellow page and reservation services prior to a trip or en-route using wide-area wireless connections.
Transit Signal Priority	This project will install transit priority emitters and upgrade traffic signal controllers along selected routes.
Dynamic Routing of Emergency Vehicles	This project would automatically calculate the ideal route between two points based on real-time roadway congestion, construction, and incident information.
Traffic Signal Preemption by Vehicle ID	Implement preemption equipment to provide traffic signal preemption by specific vehicle ID.
Work Zone Safety Systems and Monitoring	This project would provide portable cameras, variable speed limit signs and speed detection devices to monitor and control traffic conditions in work zones. It also would utilize technology within work zones to reduce motor vehicle conflicts with workers by warning workers of vehicles entering work zones.
Maintenance and Construction Coordination System	Deploy a construction activity information site that contains regional and state-wide maintenance and construction activities, including active and planned construction sites, weight and width restrictions, and travel times through work zones.
Work Zone Traveler Information	This project will provide travel time information through work zones using electronic message signs, the internet, and HAR.
Roadway Weather Information System	Install weather stations with roadway temperature, wind speed, humidity, and precipitation sensors.
Maintenance Vehicle Tracking	Track maintenance vehicles to enhance dispatch of personnel and equipment to daily events and for management of the transportation network during events.
Maintenance Event Logging System	Log maintenance requirements through an automated system to record items that require maintenance as personnel identify them daily.

Center Street Bridge to NB Front Avenue Ramp

- Further evaluation of constructing a free-flow ramp from the Center Street Bridge to NB Front Avenue is warranted. The 1998 Bridgehead Engineering Study recommended this action. The purpose of the study was to identify operational or physical improvements for traffic using the Marion Street and Center Street Bridges. The study indicates that additional improvements to roads and ramps in the bridge area could significantly increase bridge capacity. The study recommended eight improvements. If all eight projects were completed, the study concludes the peak hour vehicle capacity westbound would be 6,000 and eastbound would be 5,900. (This is an estimated 50 percent increase over the existing bridge capacity which backs up traffic once it reaches 4,000 vehicles per hour.) However, two of the highest impact projects

have yet to be built. They are removing the stop light from the Center Street Bridge exit to northbound Front Street (#2), Grade separated Bike and Pedestrian crossing of Front Street at Court Street (#5).

The findings imply that a free flow ramp is not workable because of its expense, the need for other improvements and possible disruption from construction<sup>47</sup>. Each of these reasons is not compelling or could be mitigated by more detailed design work.

- Inadequate analysis: findings are based on minimal analysis. ODOT regularly considers and approves “design exceptions” to allow non-standard improvements in constrained environments. There is no evidence that design exceptions were identified or seriously considered as part of this analysis. Given the high cost of this project and the implication that performance at this intersection is a fatal flaw<sup>48</sup>, more detailed analysis is necessary to show that this option is unworkable.
- Cost: The cost of these improvements (\$4.4 million) is modest considering the proposal for a \$425 million new bridge. In addition, modifications or refinements to the design of this connection -suggested below - could make it workable and reduce costs.
- Disruption. The extent of disruption depends on the amount of reconstruction of bridge piers or supports that is needed. The extent of reconstruction is not described and there are design options for the ramps that would significantly reduce or eliminate the need for reconstructing bridge piers. In addition, the Marion Street bridge piers will need to be reinforced or reconstructed to address structural deficiencies and enable the structure to survive a Cascadia earthquake, so some disruption is likely to occur and could be minimized by incorporating ramp improvements with these other needed upgrades.

Options for improving performance of the Center to Front intersection that warrant further consideration include:

- Narrowing NB Front Avenue South of the Center Street bridge ramp from two lanes to one. This would provide additional space to accommodate turn movements and with signal refinements could allow a free flow right turn. This would also reduce or avoid the need to reconstruct Marion Street Bridge piers.
- Realigning Front Avenue to the west. There are three open spans under the Center Street Bridge between northbound Front Street and the train tracks. The southbound lane of Front Street could be moved one or two spans to the west to provide room for the foundation and piers for a new off-ramp from Center Street to Front Street going north.

Benefits of any individual action may be modest, but this in combination with other actions ramp improvements may significantly improve performance of Alternative 2A .

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47 “Free flow ramp was not pursued ...” because of cost, need for other improvements and disruption from reconstruction of the Marion Street bridge spans. Draft Findings page 36

48 “The intersection analysis results document that Alternative 2A performs worse than the No Build Alternative in 2035 at the Center Street Off-Ramp to northbound Front Street in both the AM and PM peak. Therefore, Alternative 2A does not meet Threshold #1. ” Land Use Technical Report, Page 4-49

**4. The proposed UGB amendment is not consistent with the Oregon Highway Plan Major Improvements Policy, which requires that cost effective actions and upgrades be implemented before major new improvements .**

The Oregon Highway Plan Policy 1G applies to this decision and requires that cost-effective actions to address transportation needs be implemented before plans include commitments to construct major improvements.

Since road construction is very expensive and funding is very limited, it is unlikely that many new highways will be built in the future. Instead the emphasis will be on maintaining the current system and improving the efficiency of the highways the State already has. The Major Improvements Policy reflects this reality by directing ODOT and local jurisdictions to do everything possible to protect and improve the efficiency of the highway system before adding new highway facilities. .... These priorities - laid out in Action 1G - take precedence over other actions in this policy."

Action 1G.1 requires that "Plans must document the findings which support using lower priority measures before higher priority measures."

Action 1G.2 requires that The state will support major improvements to state highway facilities only if the improvements ... :

- are part of plan that includes measures to manage the transportation system ...
- The major improvement would be a cost-effective means to achieve the objectives
- Funding for the project can reasonably be expected at the time the project is ready for development and construction (Oregon Highway Plan, page 86-88.)

The proposed preferred alternative does not comply with the Major Improvements Policy for the following reasons:

- Consultant reports and findings do not include findings or analysis which explains why the the higher priority actions included in Alternative 2A – or the additional actions recommended to refine alternative 2A - are not cost-effective or otherwise in compliance with Policy 1G. The findings include a generalized statement that suggests that past efforts are sufficient to demonstrate compliance with Policy 1G:

The adopted 2035 RTSP (SKATS MPO, 2015) and Salem TSP (City of Salem, 2015a) include some projects at the bridgeheads and connecting streets that will improve mobility in the short-term, but a long-term solution is required to meet mobility needs in the corridor. Based on the history of public investments that have been made to protect the existing bridge crossings and to make targeted investments to improve the efficiency and capacity of the existing bridges and connecting road system, a compelling argument can be made that the preferred alternative would be consistent with local, regional, and state priorities for major improvements ....<sup>49</sup>

This generalized conclusion is not adequate to show compliance with 1G. Policy 1G does not ask if "some" efforts have been made or are planned, it requires identification and careful consideration an of higher priority actions, and an implementation of those that are "cost-effective" before a major improvement is planned. No showing or findings that a new bridge is

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49 LUTR, page 4-27



clearly more cost-effective or conforms to the requirements in Action 1G.2<sup>50</sup>

- Consultant Reports and findings show that Alternative 2A and other higher priority actions<sup>51</sup> are cost-effective ways to reduce traffic congestion and improve emergency response<sup>T</sup>
- The preferred alternative does not include measures to “manage the transportation system” as required by Action 1G.2 including TDM, improvement traffic operations and alternative modes. As discussed above the city has not completed measures that would improve the existing system before constructing a new facility.
- No evidence or findings are provided which show that third bridge would be cost-effective in achieving key objectives (congestion reduction, emergency response) As noted earlier, a new bridge will cost almost three times more than Alternative 2A and achieve only marginally better reductions in traffic congestion. In addition, emergency response can be significantly improved through a series of lower-cost actions. By definition, these other actions are more cost effective in achieving stated transportation objectives.
- The preferred alternative does not give priority to protect the existing system (existing bridges) from Cascadia earthquake. State plans indicate that the existing Marion and Center Street bridges are identified as “Tier 3” seismic improvements that would not occur for 30-40 years.<sup>52</sup> Salem is just now seeking funds to study the seismic retrofit of the Center St. Bridge. The OHP policy requires that resources be dedicated to improving the existing structures first.
- No evidence is provided that funding for the project can reasonably be expected at the time the project is ready for development and construction. The Preferred Alternative is estimated to cost \$425 million, an amount roughly equal to the amount of local, state and federal funds that the metropolitan area expects to have available for all roadway expansion projects over the next 20-25 years.

**5. The proposed UGB and TSP amendment are not consistent with city TSP policies regarding planning for Willamette River Crossings and the city’s policy for System Efficiency.**

The Salem TSP includes the following policy for Willamette River Crossings:

The City shall work with the Oregon Department of Transportation to first identify what types of capacity and seismic improvements can and should be made to the existing Center Street and Marion Street Bridges. Secondly, the City shall work with the State and other regional jurisdictions to identify the need for additional river crossings over the next 20-40 years. If such a need is justified, the location of additional river crossings should be identified. The type of crossing method should then be determined. Finally, the method of construction and operation should be identified and pursued. (Guiding Principles of the Long-Range Transportation Strategy, #5, Salem TSP, February 2016, page 16-3)

Policy #5 is mandatory and sets priorities: it requires that capacity and seismic improvements that can and should be made must be identified before the need for additional river crossings and their location is determined. The City has not identified what capacity improvements “should” be made,

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50 The LUTR claims to cite Action 1G.2 “in full” but omits a key requirement: “Before ODOT will agree to any improvements on the state highway system, the improvements must conform to the requirements in this Action.” Oregon Highway Plan, page 88. LUTR, page 2-20.

51 Including the Additional Actions and Refinements to Alternative 2A – see above

52 Seismic Lifeline Routes Selection, SRC Website

and has not yet identified what seismic improvements “can” be made or “should” be made to the Marion and Center Street bridges. Until and unless the city and ODOT have completed a study of what “can” be done to address seismic issues and reach some agreement about what sort of improvements “should” be done address capacity and seismic issues, it is premature and inconsistent with the city’s TSP to adopt an amendment to the UGB that decides need for and location of a new river crossing.

The preferred alternative is also inconsistent with Transportation Policy 12 in the city's comprehensive plan:

Policy 12: The implementation of transportation system and demand management measures, enhanced transit service, and provision for bicycle and pedestrian facilities shall be pursued as a first choice for accommodating travel demand and relieving congestion in a travel corridor, before widening projects are constructed.<sup>53</sup>

The preferred alternative does not identify, evaluate or adopt specific TSM, TDM, transit service or bike and pedestrian improvements to accommodate traffic congestion. Instead, it simply assumes that such measures might be able to reduce traffic demand. Because the analysis does not identify or evaluate specific actions as a first choice towards meeting transportation needs, it is not consistent with Transportation Policy 12.

**6. The TSP amendment for the preferred alternative is not in compliance with the TPR because it would degrade performance of state highways below performance standards in the Oregon Highway Plan Mobility Policy .**

The TPR (OAR 660-012-0060(1) and (2)) requires that plan amendments that significantly affect a transportation facility demonstrate that they are consistent with applicable performance standards:

If a local government determines that there would be a significant effect, then the local government must ensure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility measured at the end of the planning period identified in the adopted TSP (OAR 660-012-0060(2))“A plan or land use regulation amendment significantly affects a transportation facility if it would: ...

(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan. (OAR 660-012-0060(1)(c))

OAR 660 Division 024 allows city to defer the above 0060 analysis to subsequent rezoning of land to urban uses. However, the proposed amendment will also amend the city's transportation system plan (TSP) to include the proposed third bridge and other transportation facilities as planned improvements. These impacts have been identified in the TTTR and the proposed improvement results in volumes of traffic that exceed the applicable target/ standard in the Oregon Highway Plan.

The Oregon Transportation Commission adopted mobility standards in December 2011, and they are noted in the OHP. The mobility standards in the Traffic and Transportation Tech Report are based on the city’s standards for city streets and state mobility standards for the state highways. The city's findings acknowledge that the preferred alternative will allow traffic in excess of ODOT mobility

<sup>53</sup> Land Use Technical Report, page 2-24

standards:

In adopting this Preferred Alternative, the City recognizes that some intersections located within the project area will not meet the City's adopted Level of Service standards as included in Street System Element, Policy 2.5. Some of the intersections on the State roadway system will also not meet the State mobility targets, for which the State proposes to adopt Alternate Mobility Targets into the Oregon Highway Plan. (Draft TSP Amendments, page 5)

"State proposes to adopt Alternate Mobility Targets into the Oregon Highway Plan following approval of the consolidated plan amendments. The City of Salem and ODOT support a greater level of peak hour congestion in order to reduce the physical impact to surrounding neighborhoods and business districts" (Draft findings, p. 80)

The TPR requires that actions to meet applicable standards, including ODOT mobility standards be put in place as part of the proposed plan amendment. ODOT has a process for authorizing alternative mobility targets, which involves an amendment to Oregon Highway Plan:

*Policy 1F: Highway Mobility Policy*

\* \* \* \*

*"Mobility targets for state highways, as established in this policy or as otherwise adopted by the Oregon Transportation Commission as alternative mobility targets, are considered the highway system performance standards in compliance with the TPR (OAR 660-012), including applicability for actions that fall under Section -0060 of the TPR. Where it is infeasible or impractical to meet the mobility targets, acceptable and reliable levels of mobility for a specific facility, corridor or area will be determined through an efficient, collaborative planning process between ODOT and the local jurisdiction(s) with land use authority. The resulting mobility targets will reflect the balance between relevant objectives related to land use, economic development, social equity, and mobility and safety for all modes of transportation. **Alternative mobility targets for the specific facility shall be adopted by the Oregon Transportation Commission as part of the OHP.**" (OHP p. 75)*

Since the Preferred Alternative will exceed mobility standards, and as currently configured, many of those intersections are on a state highway the OTC must adopt the alternative mobility standards before they can be incorporated in the TSP. That process has not yet happened. Despite the city's findings, ODOT has neither adopted nor initiated an amendment to the Oregon Highway Plan. Until and unless such an amendment is adopted, the proposed TSP amendment would violate both TPR 0060 and the Oregon Highway Plan.

**7. The UGB amendment violates Goal 12 and the Transportation Planning Rule (TPR -OAR 660-012) and the UGB Amendment Rules (OAR 660-024) because the cities are not in compliance with TPR requirements to expand transportation alternatives.**

OAR 660-012-0035(4) requires that transportation system plans in metropolitan areas include standards to achieve expanded use of alternative modes and reduce reliance on the automobile. Standards and benchmarks are to be used to guide periodic plan updates, in coordination with the federally-required regional transportation plan.

OAR 660-012-0016(1)-(3) require that local governments update TSPs to comply with Division 012 when MPOs adopt updates to federally-required regional transportation plans.

- (1) In metropolitan areas, local governments shall prepare, adopt, amend and update transportation system plans required by this division in coordination with regional transportation plans (RTPs) prepared by MPOs required by federal law.
- (2) When an MPO adopts or amends a regional transportation plan that relates to compliance with this division, the affected local governments shall review the adopted plan or amendment and either:
  - (a) Make a finding that the proposed regional transportation plan amendment or update is consistent with the applicable provisions of adopted regional and local transportation system plan and comprehensive plan and compliant with applicable provisions of this division; or
  - (b) Adopt amendments to the relevant regional or local transportation system plan that make the regional transportation plan and the applicable transportation system plans consistent with one another and compliant with applicable provisions of this division. Necessary plan amendments or updates shall be prepared and adopted in coordination with the federally-required plan update or amendment. Such amendments shall be initiated no later than 30 days from the adoption of the RTP amendment or update and shall be adopted no later than one year from the adoption of the RTP amendment or update or according to a work plan approved by the commission. A plan amendment is "initiated" for purposes of this subsection where the affected local government files a post-acknowledgement plan amendment notice with the department as provided in OAR chapter 660, division 18.

OAR 660-012-0035(4)(e) and (7) require at each plan update, metropolitan cities and counties must report on benchmarks and, if benchmarks are not met, must consider additional actions that would achieve the benchmarks:

- (e) Metropolitan areas shall adopt TSP policies to evaluate progress towards achieving the standard or standards adopted and approved pursuant to this rule. Such evaluation shall occur at regular intervals corresponding with federally-required updates of the regional transportation plan. This shall include monitoring and reporting of VMT per capita.
- (7) Regional and local TSPs shall include benchmarks to assure satisfactory progress towards meeting the approved standard or standards adopted pursuant to this rule at regular intervals over the planning period. MPOs and local governments shall evaluate progress in meeting benchmarks at each update of the regional transportation plan. Where benchmarks are not met, the relevant TSP shall be amended to include new or additional efforts adequate to meet the requirements of this rule.

OAR 660-Division 024 requires that UGB amendments comply with all goals and rules, except for those specifically exempted. Division 024 does not exclude the relevant sections of the TPR: OAR 660-012-0016 and 0035. Consequently, 024 requires that UGB amendments comply with all other portions of Division 012 (TPR)

Salem and Keizer have approved alternative standards and benchmarks under 0035. (LUTR page 4-88) and both Salem and Keizer have adopted benchmarks for the year 2015. (LUTR, page 2-25) Salem's TSP includes a policy requiring monitoring of benchmarks.<sup>54</sup>

54 Transportation Policy 11: Local governments within the Salem Urban Area shall develop multimodal plans, services,

SKATS, the MPO for the Salem-Keizer area, adopted an updated federal RTP in May 2014. Since that time neither Salem nor Keizer have adopted findings addressing compliance with OAR 660-012-0016 nor have they updated TSPs to comply with Division 012 as it relates to 0035: i.e. neither has assessed progress in meeting the adopted 2015 benchmarks or taken other follow-up actions to meet the benchmarks or standards. The consultant reports and draft findings do not address 0016, 0035, or otherwise report region's progress in meeting adopted alternative standards and benchmarks. Therefore, the proposed amendment is not consistent with Goals 12 and 14 and the applicable rules in the TPR and the UGB amendment rules.

**8. The proposed plan amendments do not address and do not comply with goal exception requirements of the TPR (OAR 660-012-0070) as required by the UGB Amendment Rules (OAR 660-024-0040).**

The TPR (OAR 660-012-0070) requires that goal exceptions be adopted for certain transportation improvements; including a new bridge and highway, across rural lands.

The UGB amendment rules (OAR 660-024-0020) require that all goals and rules be complied with, except for those that are specifically exempted.<sup>55</sup> OAR 660-012-0070 is not exempted, and, consequently is applicable to the proposed bridge and roadways because they are located on rural lands.

Since the city's public notice and proposed findings do not provide for an exception as required by OAR 660-012-0070, the proposed amendment does not comply with OAR 660-012-0070 and Goal 2.

**9. The TSP amendment violates OAR 660-012-0060 because closure of Rosemont off-ramps would result in traffic on Rosewood and College Drives that are inconsistent with their functional classification as local streets.**

TPR OAR 660-012-0060(1) and (2) requires that plan amendments which significantly affect a transportation facility demonstrate that they are consistent with the planned function, etc. of planned facilities.

“A plan or land use regulation amendment significantly affects a transportation facility if it would: ... [result in]

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility; (OAR 660-012-0060(1)(c))

(A)

If a local government determines that there would be a significant effect, then the local government must ensure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility measured at the end of the planning period identified in the adopted TSP (OAR 660-012-0060(2))

- The proposed TSP amendment would close the ramps that exit Highway 22 at Rosemont

and programs that decrease reliance on the SOV as the dominant means of travel. Progress toward this objective shall be monitored through benchmarks set forth in Table 1. [Table 1 is reproduced in this report as Table 2.3-1.] LUTR, page 2-24

55 OAR 660-024-0020(1)

Street. The Traffic and Transportation Technical report indicates that this closure would shift traffic that currently uses the Rosemont ramps to other routes, including Wallace Road, Edgewater Street, Doaks Ferry Road and Rosewood and College Drive:

With the closure of the Rosemont Avenue exit-ramp, it is forecasted that former Rosemont Avenue-bound traffic wishing to access West Salem neighborhoods would shift to the Wallace Road exit (either to access Edgewater continue north on Wallace Road) or would continue west on OR 22 to Rosewood Drive, College Drive, or Doaks Ferry Road.<sup>56</sup>

- Rosewood Street and College Drive are designated as local streets in the Salem TSP. The City's TSP indicates that the function of local streets is to "provide access to properties and basic circulation within a neighborhood". The TSP describes the function of collector streets as to: "Primarily distributes traffic between neighborhoods, activity centers and the arterial street system. Secondly, provides property access." Capacity, is described in terms of "Ultimate design ADT – (Average Daily Traffic) as " Residential livability concerns arise at approximately 1,600"<sup>57</sup>
- Closing the Rosemont exit ramp will, according to the TTTR, cause some traffic that currently uses the Rosemont exit to use Rosewood and College Drive to access the surrounding neighborhoods, which would cause them to function as collector streets.

**10. The proposed UGB Amendment and Goal exception do not comply with Division 4 (OAR 660-004-0018) and Division 24 (OAR 660-024-0005(6) and (7)) because the city does not apply plan designations that limit uses allowed by the UGB amendment/exception to the "Preferred Alternative" as it is described and justified in the EIS and other supporting documents**

Division 4 and Division 24 Requirements

The preferred alternative requires an exception to Statewide Planning Goal 15 (Willamette River Greenway) and an Urban Growth Boundary amendment. The UGB rule and the exceptions rule require that lands be planned and zoned in a manner that limits allowed land uses to match those that are justified in the exception/UGB amendment.

Requirements for exceptions to Goal 15 - and most other goals - are set out in the Exceptions Rule (OAR 660, Division 4). OAR 660-004-0018 makes it clear that, once approved, a goal exception is limited to allowing the use that is proposed and justified in the goal exception:

(4) "Reasons" Exceptions:

(a) When a local government takes an exception under the "Reasons" section of ORS 197.732(1)(c) and OAR 660-004-0020 through 660-004-0022, plan and zone designations must limit the uses, density, public facilities and services, and activities to only those that are justified in the exception.

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56 TTTR, July 2016, page 1-8, 1-14

57 Salem TSP, Street Classification System, July 2014, page 3-7

(b) When a local government changes the types or intensities of uses or public facilities and services within an area approved as a "Reasons" exception, a new "Reasons" exception is required.

Similarly, the UGB amendment rule (OAR 660-024-0050(6) and (7)) require that:

- (6) When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination and the requirements of section (7) of this rule, if applicable. ....
- (7) Lands included within a UGB pursuant to OAR 660-024-0065(3) to provide for a particular industrial use, or a particular public facility, must be planned and zoned for the intended use and must remain planned and zoned for that use unless the city removes the land from the UGB.

As explained below, the proposed UGB amendment violates this requirement because it is for a particular public facility, but the city is not applying plan or zoning designations which limit allowed uses appropriately.

- The proposed Salem River Crossing is premised on the proposal for "a particular public facility" - that is: the "preferred alternative" which includes the construction of a new four lane bridge with connecting ramps and related roadway improvements that are estimated to cost at least \$425 million.<sup>58</sup> The justification for the UGB amendment is premised on this option, and argues that this option meets transportation needs, while other less expensive options ( that do not involve a UGB amendment, in particular Alternative 2A, ) do not or cannot "reasonably" meet the needs.
- The city proposes to apply a Parks and Open Space (POS) designation which includes no restrictions that the land added to the UGB only be used for the Preferred Alternative as it is described and justified in the EIS and supporting documents. The proposed findings side-step the requirement to apply a restrictive planning designation by asserting:

Under Oregon's planning framework, local jurisdictions do not typically apply specific plan designations or zones to transportation facilities (including highways, bridges, roads, bicycle and pedestrian paths, etc.). Salem's zoning designations extend to the centerline of the right-of-way and the zoning code does not include a specific "use category" for linear transportation facilities; the use is permitted outright in all zones. (Findings, page 108)

- The failure to apply restrictive plan and zone designations violates the UGB amendment and goal exception rule requirements. While such plan designations may not be ' typical' they are nonetheless required by the clear language of 0050(6) and (7).

<sup>58</sup> The city's findings acknowledge that the proposed exception is for a specific facility: "The proposed UGB amendment is based on a specific need for an urban transportation planning facility within the 20-year planning horizon." Findings, page 108.

Nothing prevents the city from developing and applying a new plan designation or modifying an existing plan designation to accomplish compliance with the rule.



## ATTACHMENT 1

### **DLCD Guidance for Evaluating “Reasonableness” of Non-exception Alternatives**

In 2010, as part of Metro Urban and Rural Reserves rulemaking, DLCD prepared guidance for applying OAR 660-012-0070 for review of transportation improvements on rural lands. Memo from Richard Whitman, DLCD Director to LCDC, August 20, 2010, September 1-2, 2010 LCDC Meeting, Agenda Item 9 - Attachment G :

To justify a goal exception, the supporting analysis must show that the transportation need cannot reasonably be met by other measures that do not require a goal exception. To justify an exception, the city/county must show that non-exception alternatives to meeting needs are not reasonable based on cost, operational feasibility, economic dislocation or other relevant factors. In considering these factors, the local government must adopt and justify thresholds for determining whether an alternative is reasonable or unreasonable. For example, if a particular non-exception alternative is judged to be too expensive, the exception must include and explain the basis for assessing what level of cost is “unreasonable”.

The Department has the following observations and recommendations for conducting this analysis:

- It should be understood that non-exception alternatives, by their nature, generally do not perform as well as exception alternatives. It is generally less expensive and more expeditious to build a new road across farmland than to either widen an existing roadway or make improvements to the street system within an urban growth boundary. The fact that exception alternatives perform better though, is not the standard for approving goal exceptions. Non-exception alternatives are preferred if they perform reasonably well in meeting the identified need.
- Non-exception alternatives must be described with sufficient specificity to allow a general understanding of where they would be located, how they would operate and what impacts they could create. The evaluation of non-exception alternatives should seek to make each of the alternatives as workable and reasonable as possible. As noted above, making roadway improvements through developed areas involves a degree of impact to affected homes and businesses. A broad-brush analysis of a road widening alternative can create the appearance of potentially significant impacts. However, when road improvements are made in urban areas, they are typically carefully aligned and designed to minimize impacts and complement rather than harm adjoining homes and businesses.
- In assessing non-exception alternatives, the city/county should take care to incorporate reasonable design and mitigation measures that would make nonexception alternatives as workable as possible. As a practical matter this is an iterative process: the city/county should outline major alternatives, then identify their apparent deficiencies or shortcomings, and then assess what modifications to design or alignment (or addition of mitigating measures) might lessen or offset the perceived disadvantages while trying to maintain most or all of its fundamental functionality.
- In evaluating what measures are reasonable as options, the city/county should consult with ODOT about experience with similar roadway or highway improvement projects in communities around Oregon. Other built projects effectively provide on-the-ground evidence of what constitutes a reasonable practice in terms of acceptable cost, community dislocation, or compromises to optimal transportation access or mobility.

September 1-2, 2010 LCDC Meeting, Agenda Item 9 - Attachment G, page 6-7

**INTERSECTION PERFORMANCE**

**The proposed threshold for reducing downtown congestion is not justified because the Preferred alternative results in more congestion than No-Build at 20% of Study Area Intersections**

The Land Use Technical Report (LUTR) proposes the following threshold for intersection performance for seven so-called “Tier 1” intersections.

Threshold #1: Does the Build alternative reduce congestion levels at the existing bridgeheads (measured by v/c ratios at Tier 1 intersections), when compared with the No Build Alternative in 2035?

**Evaluation of Alternative 2A:** In order to understand traffic mobility effects at the existing bridgeheads, the traffic analysis associated with the UGB amendment (conducted for the Traffic and Transportation Technical Report Addendum (CH2M HILL, 2016)) focused on a total of twelve study intersections within the area of influence of bridge traffic. The following seven intersections that are in close proximity to the bridge and/or expected to be impacted by queuing from the bridge were categorized as “1st Tier” intersections.

- Wallace Road/Taggart Road
- Wallace Road/OR 22-Edgewater Street
- Center Street Off-Ramp/Northbound Front Street
- Marion Street/Commercial Street
- Marion Street/Liberty Street
- Center Street/Commercial Street
- Center Street/Liberty Street

The intersection analysis results document that Alternative 2A performs worse than the No Build Alternative in 2035 at the Center Street Off-Ramp to northbound Front Street in both the AM and PM peak. Therefore, Alternative 2A does not meet Threshold #1. By comparison, the preferred alternative performs better than the No Build Alternative in 2035 for all 1st tier intersections in both the AM and PM peak and meets Threshold #1. (LUTR, page 4-49)

**Analysis**

Intersection performance for Alternative 2A is provided in Appendix A to the Traffic and Transportation Technical Report. There are 14 Tier 1 “intersection measures” (7 intersections x 2 peak hours).

"Tier 1" Intersection Performance (V/C – Volume to Capacity) (From Appendix A, FEIS Traffic and Transportation Technical Report)								
ID	Intersection	Mobility Standard	AM Peak Hour Performance in 2031			PM Peak Hour Performance in 2031		
			No-Build	2A	Difference	No-Build	2A	Difference
6	Wallace/Taggart	0.95	1.34	1.44	-0.11	1.26	1.07	0.19
7	Wallace/22/Edgewater	0.95	1.39	1.18	0.19	1.05	0.8	0.25
11	Center ST off ramp/NB Front	.9 or 1.0	1.44	1.8	-0.36	1.12	1.5	-0.38
12	Center/Commercial	0.85	1.69	1.25	0.44	0.82	0.8	0.02
13	Center/Liberty	.9 or 1.0	0.73	0.97	-0.24	0.9	0.89	0.01
15	Marion/Commercial	0.85	0.81	0.54	0.27	2	1.29	0.72
16	Marion/Liberty	.9 or 1.0	0.69	0.67	0.02	1.17	0.87	0.3

Alternative 2A performs *worse* than No-Build

Alternative 2A *meets* mobility standard

Alternative 2A performs *better* than No-Build

Alternative 2A performs worse than No-Build but *meets* mobility standard

Here's what the table says about Alternative 2A:

- For 10 of 14 intersection measures (70%), Alternative 2A *meets* the proposed threshold – that is, it performs *better* than the No-Build
- For 1 intersection measure 2A performs slightly worse than No-Build, but *meets* the applicable mobility standard
- For only 3 of the 14 intersection measures (21%) does 2A not perform better than No-Build. The three intersections are:
  - Wallace Road and Taggart Road in the AM peak hour
  - Center Street Off-Ramp/ NB Front Street in AM and PM peak hours.

Table 5.1-1 in the Traffic and Transportation Technical Report (TTR, page 5-2 through 5-4) shows intersection performance for the preferred alternative. (Table 5.1-1 2040 Preferred Alternative Intersection Analysis for AM and PM Peak Hours and Control Types) The TTR evaluates performance for 34 intersections in the study area in 2040. Table 5.1-1 shows following results for 68 intersection measures (34 intersections x 2 peak hours) for the Preferred Alternative (PA)

Here's what Table 5.1-1 says about the performance of the preferred alternative:

- For 35 intersection measures (50%) the PA performs *better* than the No-Build Alternative
- For 2 intersection measures, the PA performs the same as the No-Build Alternatives
- For 16 intersection measures (24%), the PA performs *worse* than the No-Build Alternative
- For 14 intersection measures (20%), the PA performs worse than the No-Build, but meets the

applicable mobility standard.

- 13 of the 16 intersection measures where the PA performs worse than the No-Build are located in NE Salem -
  - 22 Commercial and Pine - AM
  - 23 Liberty and Pine - PM
  - 24 Broadway and Pine - AM/PM
  - 25 Commercial and Hickory - PM
  - 26 Hickory and Liberty - PM
  - 29 Salem Parkway/ Liberty AM/PM
  - 30 Salem Parkway/Broadway AM/PM
  - 31 Salem Parkway Cherry AM/PM

**The proposed intersection performance threshold is not justified because the preferred alternative also fails to improve performance over the no-build for 24% of the intersections in the study area.** The purpose of the threshold is to draw a bright line that distinguishes a solution that reasonably meets transportation needs from one that doesn't. In this case, the region proposes to set a threshold that is not met by the preferred alternative. In other words, if the region concludes that the preferred alternative reasonably meets transportation needs, in spite of the fact that it fails to perform better than the no build at roughly one-quarter of the study area intersections, it is not reasonable for the region to reject as “unreasonable” Alternative 2A which fails at only 20% of study area intersections.

The analysis of non-expansion alternatives is largely limited to Alternative 2A, as that option was presented in the Draft Environmental Impact Statement (DEIS). The Traffic Technical report table 4.2-3 shows the impact of the Preferred Alternative in 2040 at 33 intersections, for both AM and PM hours, for a total of 66 different measurements. Appendix A to the Traffic tech report shows the impact of Alternative 2A on most of those intersections. Alternative 2A performs as well as or better than the preferred alternative at 43 of those measuring points where both alternatives are measured.

The preferred alternative, in spite of its extraordinarily higher cost, does better at only 20 intersections. Indeed, as the traffic analysis points out for 16 intersection measures, the PA performs worse than the No Build, and for 14 intersections it performs worse than the No Build but does meet mobility standards. Most of the intersections measured where the PA performs worse than the NO Build are located in NE Salem.

Indeed, figures 4.2-5 and 4.26 of the Traffic tech report shows that the preferred alternative merely moves congestion from downtown to north Salem and north on Wallace Road in West Salem. Alternative 2A improves those intersections to a noticeable degree over both the PA and the No Build alternative. The Draft Findings acknowledge this issues :

“Similar changes to functional classifications are included in the package of proposed Salem TSP amendments for short segments of Pine and Hickory to provide consistent functional classifications for roadways in the eastside bridgehead area. The proposed TSP amendments acknowledge that integrating the Preferred Alternative into the existing street system in NE Salem will be a significant issue over the course of the planning period.” Draft Findings, p. 145.

In other measures the preferred alternative does not deliver reduce traffic congestion to the extent worthy of a \$425 million dollar investment. P. 4-30 of the traffic technical report says that region wide, the preferred alternative would reduce congestion by only 1%-3% (except for Vehicle Hour delay in the AM – 12%) over the No Build alternative. There is no comparison with the 2A alternative in this study, but surely, for 1/3 of the cost, it could meet those low benchmarks.

## **INDUCED TRAVEL**

Comparison of traffic volumes and congestion among the various alternatives is based on modeling done by SKATS, the regional transportation planning agency. The model SKATS uses has a serious limitation which affects its ability to accurately estimate future conditions. Specifically, the model does not properly account for the effects of either congestion or expanded capacity on future traffic volumes – what experts term “induced travel”.

Consultant reports cite transportation expert Todd Litman's comprehensive evaluation of available studies and literature on induced travel<sup>59</sup> but the traffic analysis includes no formal accounting or adjustment of future traffic volumes to account for “induced travel”. A full review of Litman's evaluation shows that induced travel is significant, that it is not properly accounted for by models like that used by SKATS, and the result is that the model overestimates traffic volumes and congestion in the “no-build” and under-estimates traffic volumes for a new bridge.

### **The SKATS model, like most urban transportation models, does not account for induced travel**

- Traffic analysis in the Traffic and Transportation Technical Report TTR is based on SKATS model which is a four step model which is a four step model <sup>60</sup>.
- Traditional four-step travel demand models do not fully address induced travel or induced growth – Land use allocation methods overlook accessibility effects, trip generation often fails to account for latent trips (potential trips constrained by congestion), many models overlook time-of-day shifts, and static traffic assignment algorithms may not account for queuing impacts on route shifts.<sup>61</sup>
- “Travel demand models used by most state departments of transportation and MPOs .... usually do not account for any effects of highway improvements on the total number of trips made and the shifts in the locations of households, businesses and other activities that might have implications for vehicle miles traveled. (LUTR at 3-3)
- Most current traffic models can predict route and mode shifts, and some can predict changes in scheduling and destination, but few adjust trip frequency and most ignore the effects transport decisions have on land use development patterns (Beimborn, Kennedy and Schaefer 1996; Ramsey 2005; Næss, Nicolaisen and Strand 2012). For example, they do not recognize that highway capacity expansion encourages more automobile-dependent urban fringe development. As a result, current models recognize diverted traffic but do not account for most forms of long term induced vehicle travel, and thus underestimate the amount of traffic likely to be generated when congested roads are expanded.<sup>62</sup>
- To predict generated traffic, transport models must incorporate “feedback,” which reflects the impacts congestion has on travel behavior, and long-term changes in transport and land use patterns. This recognizes that congestion diverts traffic to other routes, times and modes, and reduces trip length and frequency, while reduced congestion has the opposite effects. Full feedback is necessary to accurately predict future traffic congestion and traffic speeds, and the incremental costs and benefits of alternative projects and policy options.<sup>63</sup>

59 Land Use Technical Report, page 3-4

60 Traffic and Transportation Technical Report, page 3-1,

61 Litman, Generated Traffic, Implications for Transport Planning, August 2016, page 10

62 Litman, Generated Traffic, Implications for Transport Planning, August 2016, page 13

63 Litman, Generated Traffic, Implications for Transport Planning, August 2016, page 13

## **Failure to properly account for induced travel means the analysis significantly overstates congestion reduction benefits of roadway expansion**

- Litman's research indicates that generated traffic often fills a significant portion of capacity added to congested urban roads. Litman's paper concludes with the statement: "Ignoring generated traffic overestimates the magnitude of future traffic congestion problems, overestimates the congestion reduction benefits of increasing roadway capacity, and underestimates the benefits of alternative solutions to transportation problems"<sup>64</sup>
- . . . current travel demand models tend to predict unreasonably bad conditions in the absence of a proposed highway or transit investment. Travel forecasting, as previously discussed, does not contend well with land-use changes or effects on nearby roads or other transportation alternatives that result from transportation improvements or growing congestion. Before conditions get as bad as they are forecasted, people make other changes, such as residence or employment changes to avoid the excessive travel costs. (Government Accountability Office, 2005)<sup>65</sup>
- Models without full feedback tend to overestimate future congestion problems and overestimate the benefits of roadway capacity expansion. In one example, modeling a congested road network without feedback underestimated traffic speeds by more than 20% and overestimated total vehicle travel by more than 10% compared with modeling with feedback (Comsis 1996). Models that fail to consider generated traffic were found to overvalue roadway capacity expansion benefits by 50% or more (Williams and Yamashita 1992).<sup>66</sup>
- The amount of traffic generated by a road project varies depending on conditions. It is not capacity expansion itself that generates travel, it is the reduction in congestion delays and therefore per-mile travel costs. Expanding uncongested roads will generate no traffic, although paving a dirt road or significantly raising roadway design speeds may induce more vehicle travel. In general, the more congested a road, the more traffic is generated by capacity expansion. Increased capacity on highly congested roads often generates considerable traffic (Marshall 2000). Older studies of the elasticity of VMT growth with respect to increased roadway lane-miles performed during the early years of highway building (during the 1950s through 1970s) have little relevance for evaluating current urban highway capacity expansion. In developed countries, where most highway expansion now occurs on congested links, such projects are likely to generate considerable amounts of traffic, providing only temporary congestion reduction benefits. Generated traffic usually accumulates over several years (Goodwin 1998). Under typical urban conditions, more than half of added capacity is filled within five years of project completion by additional vehicle trips that would not otherwise occur, with continued but slower growth in later years.<sup>67</sup>
- Ignoring these factors distorts planning decisions. Experts conclude, "...the economic value of a scheme can be overestimated by the omission of even a small amount of induced traffic. We consider this matter of profound importance to the value-for-money assessment of the road programme" (SACTRA 1994). "...quite small absolute changes in traffic volumes have a significant impact on the benefit measures. Of course, the proportional effect on scheme Net Present Value will be greater still" (Mackie, 1996) and "The induced travel effects of changes in land use and trip distribution may be critical to accurate evaluation of transit and highway

64 LUTR, 3-4

65 Government Accountability Office. (2005). Highway and Transit Investments: Options for Improving Information on Projects' Benefits and Costs and Increasing Accountability for Results (GAO-05-172). Washington, DC.

66 Litman, Generated Traffic, Implications for Transport Planning, August 2016, page 13-14

67 Litman, Generated Traffic, Implications for Transport Planning, August 2016, page 12

alternatives" (Johnston, et al. 2001)<sup>68</sup>

### **Induced travel is most likely to occur when roadway capacity is added in congested urban areas**

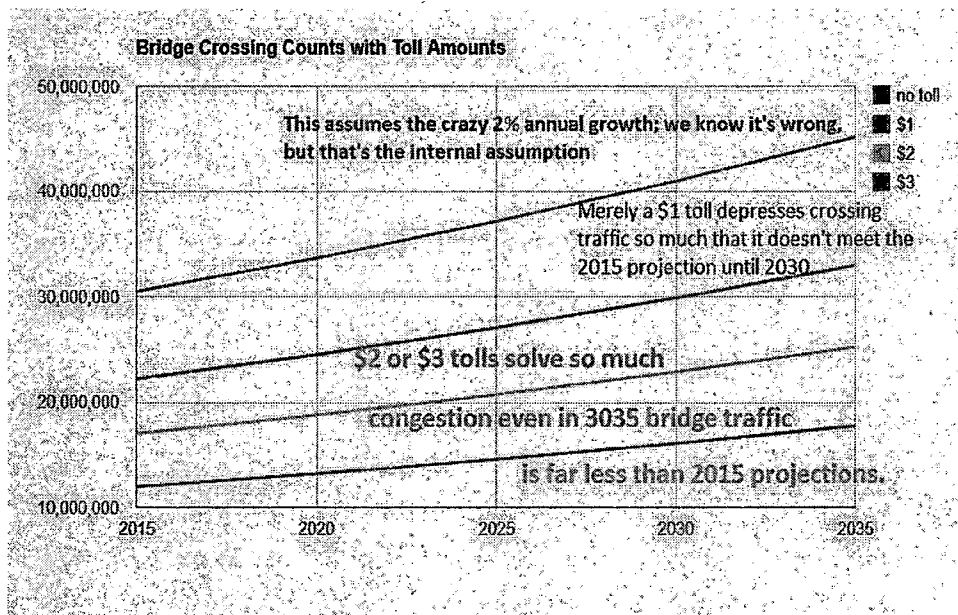
Induced travel effects of 2A will be less than PA because it would provide less capacity and because PA would provide a dramatic improvement in accessibility to currently undeveloped land in NW Salem. Traffic report shows:

- Land use analysis estimates 2% increase in amount residential development in West Salem. Litman cites study indicating that even small changes in development can result in major changes in performance. Increase in amount of residential development doesn't address change in travel behavior of existing residents that would result from proposed bridge. Traffic analysis estimates new bridge would significantly reduce travel times between northwest part of West Salem and northeast Salem and Keizer.

### **TOLLING**

**The traffic analysis is flawed because it is inconsistent with the recommended funding strategy that includes tolls.**

- Tolling is identified a key element of the proposed transportation funding strategy: The recommended funding strategy for the SRC preferred alternative anticipates that all bridge crossings would be charged \$1.50.<sup>69</sup> Tolling would be the single largest source of funding and would raise \$175 million.



- Professional literature and studies show that tolling can significantly reduce travel. Using SRC's own studies, Salem Breakfast on Bikes shows that tolling would significantly reduce future bridge volumes<sup>70</sup>:

68 Litman, Generated Traffic, Implications for Transport Planning, August 2016, page 2

69 SRC Funding Strategy Memo, March 6, 2015, page 6

70 Salem Breakfast on Bikes, <http://breakfastonbikes.blogspot.com/2016/08/new-land-use-memo-salem-river-crossing-shows-how-deeply-unserious-we-are.html>, and <http://breakfastonbikes.blogspot.com/2014/12/third-bridge-is-self->

- The traffic analysis does not consider the effect that tolls would have on projected traffic volumes.<sup>71</sup> Consideration of adding tolls to either the Preferred alternative or Alternative 2A would significantly change expected traffic volumes and congestion levels.
- Experience with toll projects in Washington State and the evaluation of the proposed Columbia River Crossing shows that imposition of tolls reduces traffic volumes by as much as 30%.<sup>72</sup>

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[negating-tolls-reduce-traffic-below-congested-levels.html](#) based on a November 2014 Memo from ECO Northwest  
"Salem River Crossing – Revenue Projections"

71 Mike Jaffe, SKATS Director, September 14, 2016

72 Sightline Institute, SR-520: A CASE OF BAD FORECASTING? Early predictions overstated growth, underestimated diversion.  
September 10,20



Testimony of Jim Scheppke  
1840 E. Nob Hill, Salem  
October 12, 2016

My name is Jim Scheppke and I reside in Ward 2 in Salem.

I ask that tonight mark the end of the Salem River Crossing Project.

I ask that because the Salem River Crossing is a failed project. You can compare it to another failed project, the Columbia River Crossing project, that we are all painfully aware of. It failed because in the end there was no viable plan to pay for it. And that fact was recognized by state elected officials, and they did the responsible thing and stopped throwing good money after bad. You need to do the same.

In its ten year history the Salem River Crossing Project has actually failed three times. The first failure happened on August 15, 2012, when the Salem River Crossing Task Force, having met for six years failed to agree on a bridge option to forward to the Project Oversight Team. I was there. There was no agreement. But instead the *plurality* decision of Alternative 4D went forward, which was a mistake.

And of course 4D was a horrific recommendation, which the Salem City Council realized and tried to fix with the so-called Salem Alternative.

And this is when the project failed a second time, because the Salem Alternative was officially "accepted" by the Project Oversight Team. But not really. They proceeded to modify it beyond recognition.

The Salem Alternative, was supposed to be a "signature bridge" that minimized piers in the water. But the Preferred Alternative that is the subject of this hearing is not a signature bridge, and it will have 10 piers occupying nearly 1,300 sq. ft of riverbed.

Public works staff told the City Council in May, 2013, that "no existing residential properties are removed" by the Salem Alternative. But the Preferred Alternative will require the removal of over 100 homes and businesses.

The Salem Alternative moved the Rosemont exit to Eola. But the Preferred Alternative simply removes the Rosemont exit with no replacement.

So that was the second failure of this process, and when the Salem City Council learned that the Salem Alternative was the victim of a bait and switch, that should have been the end.

But it wasn't the end. Which led to the 3rd failure. That being the failure to come up with a viable funding plan for this project. The funding plan with bridge tolls and new taxes and fees that was developed at the end of 2014 by the Project Oversight Team is a total fantasy.

This funding plan that is required to be part of the Final Environmental Impact Statement has zero credibility and if the Federal Highway Administration is doing their job, they will reject it.

Again, let's not forget that it was the lack of a viable funding plan that brought an end to the Columbia River Crossing Project. Our state elected officials did not pretend otherwise. They pulled the plug.

And after three failures, it is time for you to be responsible and pull the plug on the Salem River Crossing.

City of Salem

October 12, 2016

Planning Department

555 Liberty St. SE

Salem, OR 97301

Re: CA-16-04

Please submit the following comments into the record for the Salem River Crossing (SRC):

**Funding for the SRC is uncertain and would result in a burden to the local community.**

As stated in the Findings Report, "Federal regulations require that the financial plan for metropolitan planning organizations demonstrate "financial constraint." Therefore, the Regional Transportation System Plan must identify which improvements can be implemented using "committed funding sources," which improvements can be implemented using "reasonably anticipated" resources, and which improvements will require the development of "new funding sources."

The RTSP includes "related surface street improvements to support the new bridge crossing in the financially constrained project list (Marine Drive and related connections – project S297; Front Street widening and realignment – project S096)." (Findings Report, p. 159)

There is no plan in the RTSP to pay for the bridge and related ramps. The Findings state that portions of the bridge will "likely" be paid for by ODOT. There is no justification for that statement. They also say that local, state and regional partners will share the \$425 million cost. (Findings Report, p. 159) Yet as of this date, there are no commitments from local, state or regional partners to help fund the bridge.

The March 6, 2015 Project Funding Strategy memo to the Project Oversight Team lists several proposed methods of funding the SRC. Regarding state and federal funds, the memo says,

"\* \* \*one Oversight Team member suggested that it was reasonable to anticipate project funding contributions being approximately 50% from local revenue sources and 50% from state and federal sources. This project has the same ability to affect the state as Pioneer Mountain-Eddyville (Hwy. 20), the NewbergDundee bypass, and the I-5 interchange area in Woodburn, which all received a high percentage of state funding."<sup>1</sup>

This reasoning is faulty. The Hwy 20, Newberg Dundee bypass, and I-5 interchange are all on state or interstate highways. The SRC is a local project with very little benefit to the state highway system. The preferred alternative is much more like the local Sellwood Bridge in Portland. Replacing that bridge cost \$319. Approximately 67% of the funds came from local

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<sup>1</sup> Project Funding Strategy Memorandum, March 6, 2014, p.4

sources, including \$141.7 million from Multnomah county vehicle registration fees, and \$74.7 million from the city of Portland. The state contributed only \$35 million from the Jobs and Transportation Act, approximately 11%.

ODOT has not indicated that it will help fund or maintain the bridge. The Findings cannot cite to any commitment of funds from ODOT.

The Funding Strategy also recommended using the STIP money allocated to the MWVACT:

"A source of state and federal funding discussed was the Statewide Transportation Improvement Program (STIP) which includes federal and state funds. The MidWillamette Valley Area Commission on Transportation (MWACT) has a role in recommending projects that would use these funds. It would take approximately three years to construct the bridge, another year for Marine Drive, and two years to construct the ramps, so that would allow six or seven years to accumulate funding through future potential recommendations by MWACT to set aside funds in the STIP for these projects. The last STIP allocation for MWACT was approximately \$17 million. Over three STIP cycles a potential of \$30-50 million could be allocated for the project."<sup>2</sup>

The MWVACT funds for the bridge are quite speculative. The MWVACT includes Marion, Polk and Yamhill Counties. The commission recommends to ODOT how to allocate the state funds allotted to this area among the various jurisdictions in those counties. The Funding Strategy anticipates that the MWVACT would set aside its allocation of ODOT money for six to seven years to help fund the bridge. This would leave the other jurisdictions in those three counties without the funds needed for all of the projects in their areas for six to seven years. It is neither reasonable nor prudent to do that and unlikely that the ACT would agree.

Tolling is expected to bring in \$175 million. Tolls would be applied to all three bridges, at \$1.50 each way. The strategy estimates \$30 million in increased property taxes. An increase in local gas tax and higher vehicle registration fees would also be required. None of these proposals have been voted on by the public.<sup>3</sup> It is speculation to think that residents would approve all four or even one or two of those funding methods. Tolling, gas tax and higher registration fees disproportionately impact low income residents who rely on their cars to get to work and school. Increasing annual taxes and fees to residents of Salem and Keizer would put our communities at a disadvantage when competing for new businesses and residents with outlying communities that will not bear this increased tax burden.

These additional costs to the community do not even take into account the permanent loss of revenue from the businesses that will be removed and the annual loss of property taxes from the 56 acres of private land needed for the bridge and road:

"The preferred alternative would require approximately 56 acres of land for new right-of-way, displacing between 45 and 55 residential units and an estimated 55 to 65 businesses (see

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<sup>2</sup> Project Funding Strategy Memorandum, March 6, 2015

<sup>3</sup> The distaste for tolls by Oregonians is well known. The only toll bridge in Oregon is the Bridge of the Gods across the Columbia River in Cascade Locks.

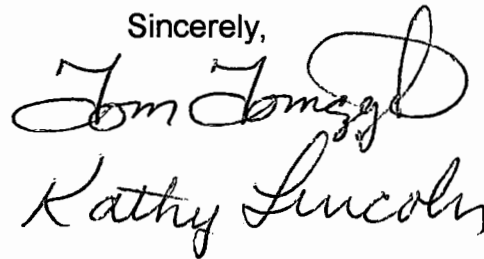
**Jurisdiction of the bridge has not been determined.**

As of the date of the hearing, there has been no determination about who will retain jurisdiction of the bridge. The city of Salem has hinted that the state may take over jurisdiction and therefore assume the maintenance costs. This is pure speculation. There is no indication that ODOT will assume jurisdiction.

Before the Preferred Alternative was conceived, some officials claimed that the new river crossing would be an “expressway” through Salem to Hwy 22 and could serve as the freight route, in lieu of the current bridges.<sup>5</sup> At that time the corridor was planned as an elevated limited access road all the way from the east side of the river to Highway 22 on the west side of the river. ( DEIS, 2-89) Since then, the Preferred Alternative has been redesigned to be at grade where it meets Marine Drive at Hope Ave. on the west. Going west, the route makes a right angle turn at Marine Dr. and goes through seven intersections on the 2-lane Marine Drive before meeting Highway 22. With the various street intersections the PA is no longer an expressway for through traffic. It is unlikely that the state would see this as an attractive alternative to the existing state highway through Salem. There is little or no benefit to the state highway system and no incentive for ODOT to take over maintenance and repair of the structure.

However, there is no discussion in the record of how much the city will need to raise its street budget to maintain and repair the bridge, ramps, and Marine Drive. That expense must be taken into consideration along with the long term cost of bonds, property tax increases, tolls, gas tax, vehicle registration fees, and the permanent loss of property taxes and revenue from the private property taken for right of way.

Sincerely,

Handwritten signatures of Tom Tamczyk and Kathy Lincoln. The signature of Tom Tamczyk is written in a cursive style, and the signature of Kathy Lincoln is also in cursive.

3291 Willamette Dr. N.

Keizer, OR. 97303

Tom Tamczyk  
Kathy Lincoln

<sup>4</sup> Land Use Technical Report, 4-13

<sup>5</sup> See discussion in the minutes of the SRC Oversight Team Meeting, February 6, 2014.





## Project Funding Strategy Memorandum

TO: Project Oversight Team  
FROM: Project Management Team  
DATE: March 6, 2015

### 1. Purpose

The intent of this memorandum is to document the conceptual funding strategy for the Salem River Crossing Project (SRC) Preferred Alternative that was developed by the Project Oversight Team (OT) on December 11, 2014.

### 2. Funding Requirements

The estimated cost of the SRC Project is approximately \$430 million<sup>1</sup>. While it would be preferable to construct the entire project at the same time, it may be constructed in phases over a longer period of time as funding became available. Recognizing that financial limitations may require phasing, the project has been divided into four possible major construction phases, summarized below:

#### **Phase B Key Elements (Approximate Cost: \$300 million)**

- Construct new bridge and ramp connections on both east and west sides of river
- Realignment of Front Street and other street modifications in North Salem
- Widening of Wallace/Hope Avenue intersection
- Widening of Wallace/Orchard Heights intersection

#### **Phase M-South Key Elements (Approximate Cost: \$20 million)**

- Construct southern section of Marine Drive (from Hope Avenue Extension to Glen Creek Road)
- Construct Beckett Street (new street opposite Narcissus Court)
- Extension of 5<sup>th</sup> Avenue NW between Cameo Street and Marine Drive

#### **Phase M-North Key Elements (Approximate Cost: \$10 million)**

- Construct northern section of Marine Drive (from Hope Avenue Extension north to River Bend Road)

#### **Phase R Key Elements (Approximate Cost: \$100 million)**

- Construct fly-over ramps from Marine Drive to Highway 22
- Construct Marine Drive at-grade section south from Glen Creek Road to fly-over ramps
- Modifications to Highway 22, including closure to westbound off-ramp at Rosemont Avenue (to be coordinated with possible relocation of this exit further west)

---

<sup>1</sup> This cost estimate will be refined and updated for the Final Environmental Impact Statement.



Per Federal Highway Administration (FHWA) guidance (FHWA, 2014), the SRC Project, as a project with an estimated cost between \$100 million and \$500 million, would be required to prepare a Financial Plan. An initial Financial Plan would need to be submitted to FHWA prior to FHWA project authorization for construction; however, a Financial Plan is *not* required to be prepared during the Final Environmental Impact Statement (FEIS) process as a prerequisite to the project being issued a Record of Decision (ROD) by FHWA.

### 3. Funding Options

Transportation infrastructure projects such as SRC could be funded through a mix of federal, state, and local sources. However, with limited options for federal and state funds, discussions with the community have focused on identifying potential local sources of revenue.

Four local funding sources were identified as the most likely to be applicable to the SRC project: **1) gas tax, 2) vehicle registration fee, 3) property tax, and 4) tolls.**

The above local funding mechanisms were considered most likely to be applicable to the project based on the following criteria (ECONorthwest, 2014):

- **Legal authority.** A funding source must not be prohibited by State statute, or it must become legal within a desired timeframe. Even for legal funding sources, complicated legal requirements could result in legal challenges, extra administrative costs, and political uncertainty.
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- **Political acceptability.** Political acceptability considers whether elected officials and the public at large are likely to support the funding source. This depends to a large extent on the issues above: if a revenue source is legal, efficient, and fair, then it should get political support from the public, advisory groups, and decision makers. Generally, public opinion is against most new or increased taxes and fees. But, if the public believes the services or projects to be funded by these taxes and fees are important, then their opinion of the revenue source may change.

Two funding workshops were held on December 3, 2014 to gather input from stakeholders about which of the local revenue sources to utilize, and at what levels, in an overall funding





strategy. The afternoon workshop was held for elected officials, public agency staff, and interested stakeholders. The evening workshop was open to all members of the public.

At the funding workshops participants discussed the strengths and weaknesses of the four potential local revenue sources and performed a funding tool exercise that allowed them to create funding strategy scenarios.

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The discussion began with the introduction of a funding strategy table containing four rows listing each of the construction phases and columns containing blank cells in which to allocate funding contribution amounts from each of the four local revenue sources as well as federal and state sources. OT members discussed the advantages and disadvantages of the respective revenue sources and the sequencing of construction phases. The OT considered ranges for each revenue source and discussed which revenue source made the most sense for particular construction phases and the project as a whole.

A first cut at the funding sources and amounts was provided by one of the OT members and is summarized in Table 1. This proposal was based on discussions that had taken place at the funding workshops and funding strategies that have been used to successfully fund other projects in the region. It was pointed out that the sum of all the funding amounts proposed exceeded the revenue needs of the project. It was clarified that the values placed in the table represented **upper ranges of revenue** that could potentially be raised for each of the funding sources. If one or more of the funding sources was not secured, it may be necessary to pursue increased funding from another source up to the maximum shown to meet the need. Or vice

Project Phase	Approx. Cost	Funding Source					
		FEDERAL	STATE	LOCAL	LOCAL	LOCAL	LOCAL
				Gas Tax	Vehicle Reg. Fee	Property Tax	Tolling
Phase B	\$300,000,000	\$20 M	\$75 M	\$65 M	\$65 M	--	\$175 M
Phase M-South	\$20,000,000					\$20 M	
Phase M-North	\$10,000,000					\$10 M	
Phase R	\$100,000,000	\$20 M	\$75 M	\$20 M	\$20 M		\$100M
<b>Total Project Cost</b>	<b>\$430,000,000</b>	<b>\$40 M</b>	<b>\$150 M</b>	<b>\$85 M</b>	<b>\$85 M</b>	<b>\$30 M</b>	<b>\$275M</b>

versa, funding amounts from one source may be reduced if more funding from another source is secured.

**Table 1: Initial Proposal for Funding Strategy**

**M = Million**



Key points discussed by OT members with respect to the development and selection of a conceptual funding strategy are paraphrased below:

- Based on a review of funding plans for other projects and the contribution those projects have received from federal and state funding sources, one OT member suggested that it was reasonable to anticipate project funding contributions being approximately 50% from local revenue sources and 50% from state and federal sources. This project has the same ability to affect the state as Pioneer Mountain-Eddyville (Hwy. 20), the Newberg-Dundee bypass, and the I-5 interchange area in Woodburn, which all received a high percentage of state funding.
- A goal of this discussion was to keep the initial funding strategy broad enough that future elected officials will have flexibility to propose politically viable options to voters.
- The point was emphasized that this is a conceptual funding strategy and no decisions regarding actual funding commitments are being made. The funding strategy being developed is just a framework to move forward.
- With regard to phasing, the OT agreed that the best scenario would be that all project phases would be constructed concurrently within a short time period. This is a regional project and all the proposed project elements are needed to create a safer, more efficient system and provide regional benefit.
- Using property tax as a revenue source was felt to have limited utility with the exception of funding Marine Drive, which could potentially be funded with a City of Salem property tax. Marine Drive has independent value, is already in the City's transportation system plan (TSP) and City residents have approved transportation improvement property taxes in the past (the most recent in 2008). Some private dollars may be collected from adjacent developments to contribute to the construction of Marine Drive.
- A source of state and federal funding discussed was the Statewide Transportation Improvement Program (STIP) which includes federal and state funds. The Mid-Willamette Valley Area Commission on Transportation (MWACT) has a role in recommending projects that would use these funds. It would take approximately three years to construct the bridge, another year for Marine Drive, and two years to construct the ramps, so that would allow six or seven years to accumulate funding through future potential recommendations by MWACT to set aside funds in the STIP for these projects. The last STIP allocation for MWACT was approximately \$17 million. Over three STIP cycles a potential of \$30-50 million could be allocated for the project. This is ODOT



Enhance Program money, but it is primarily federal dollars. If \$45 million in Enhance Program money was allocated to this project, that would break down to approximately \$5 million in state dollars and about \$40 million in federal funds. It was agreed that this money should be added into the initial funding strategy – it would be reasonable to anticipate this funding amount and it may be more reliable than some of the other local revenue sources.

- Raising more than a few million dollars of state funding would require state legislative action similar to the 2009 Jobs and Transportation Act (JTA), so some felt it may not be realistic to suggest that \$150 million of state funding could be secured, but the OT agreed that it should remain in the funding strategy as a source of revenue that should be pursued.
- Raising local revenue for this project through a gas tax and/or vehicle registration fee may be more successful if the project was part of a regional package of projects.
- Tolling allows for a broader funding base – the cost burden would not fall only on local residents. There should however be price reductions for seniors and low-income people if tolls were installed.
- It was suggested that a more reasonable revenue amount to be raised through tolling would be based on a toll of \$1.50, which would raise \$175 million. This funding could be used to construct the new bridge or some portion of the ramp connections to Hwy 22.



## 4. Recommended Funding Strategy

Following the discussion summarized in Section 3 of this memorandum, the funding strategy for the SRC Preferred Alternative was revised by the OT and is shown in Table 2.

**Table 2: Recommended Funding Strategy**

Project Phase	Cost	Funding Source					
		FEDERAL	STATE	LOCAL	LOCAL	City of Salem	LOCAL
				Gas Tax	Vehicle Reg. Fee	Property Tax	Tolling
Phase B	\$300,000,000	\$20 M*	\$5 M* \$75 M**	\$65 M	\$65 M	--	\$175 M
Phase M-South	\$20,000,000					\$20 M	
Phase M-North	\$10,000,000					\$10 M	
Phase R	\$100,000,000	\$20 M*	\$75 M**	\$20 M	\$20 M		
<b>Total Project Cost</b>	<b>\$430,000,000</b>	<b>\$40 M*</b>	<b>\$5 M*</b> <b>\$150 M**</b>	<b>\$85 M</b>	<b>\$85 M</b>	<b>\$30 M</b>	<b>\$175 M</b>
Tax/Fee/Toll necessary to generate revenue shown				\$.06/Gallon	\$25/Year	\$0.37/\$1K	\$1.50/crossing

**M = Million**

\*Potential MWACT STIP allocation

\*\* Would require legislative action

To reiterate, the sum of all the funding amounts proposed exceeds the revenue needs of the project and should be viewed as suggested maximum values that could potentially be secured with each of the funding sources. The development of financial plans for large transportation infrastructure projects such as this is an iterative process where the funding strategies are often modified based on the success or failure in securing funding.

## References

ECONorthwest. November 12, 2014. *Salem River Crossing Revenue Projections Memorandum*.

Federal Highway Administration (FHWA). December 18, 2014. *Major Project Financial Plan Guidance*.

# Testimony of Peter Bergel 10-12-16

My name is Peter Bergel. I live at 1850 Saginaw St. South in Salem. Thank you for the opportunity to testify today.

Above the questions of which building plan to choose for another river crossing bridge, who supports it, and what it will actually accomplish, hovers the question of how it might be funded.

The Project Oversight Team issued a Project Funding Strategy Memorandum on March 6, 2015, which – as far as I know – is the most recent official attempt to address this question.

This graph from that memorandum summarizes the Team’s view of the options:

Project Phase	Approx. Cost	Funding Source					
		FEDERAL	STATE	LOCAL	LOCAL	LOCAL	LOCAL
				Gas Tax	Vehicle Reg. Fee	Property Tax	Tolling
Phase B	\$300,000,000	\$20 M	\$75 M	\$65 M	\$65 M	–	\$175 M
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Does anyone here honestly believe that with federal and state aid optimistically estimated at \$190 million of a \$430 million project – less than 45% - the people of the Salem area are going to love this project enough to come up with the other 55% - some \$237 million? I don't. We probably won't get to vote on the gas tax or the vehicle registration fee, but I think there's going to be enough opposition to them to make our representatives think twice and thrice about approving such unpopular measures. We **will** get to vote on the property tax part and on the tolls and personally I find it really hard to believe that the public is going to support either one – in fact, any of this.

Furthermore, the numbers on this chart don't add up. The numbers along the bottom line add up to total revenue of \$665 million, not \$430 million. This discrepancy is explained thus: “the values placed in the table represented upper ranges of revenue that could potentially be raised for each of the funding sources.

If one or more of the funding sources was not secured, it may be necessary to pursue increased funding from another source up to the maximum shown to meet the need.” It also acknowledges that the numbers listed for government support are likely to be high. Thus the “other source” from which the additional funding has to be secured is the local public.

The biggest piece of that is projected to be from tolls of \$1.50 per crossing! Who is expected to support THAT? Furthermore, the text acknowledges that even this is only expected to raise \$175 million. I think \$0 is more likely, but leaving that aside, I don't think that even the rosier realistic projection can get you to the cost of the project, even before the likely cost overruns. We are told that the project could be constructed in “phases.” What is likely to happen, then, is that the project would get started, run out of money and then sit there – a multi-million-dollar eyesore and monument to the folly of people who were unable to admit that this was a losing struggle from the start.

I call upon all decision-makers involved to admit that this bridge is a lost cause and stop throwing good money after bad.

# Land Use & Transportation Issues not addressed in the Preferred Alternative Willamette River Crossing proposed findings.

## Preferred Willamette River Crossing CA16-04 Questions

Addendum Testimony by E. M. Easterly  
October 12, 2016

1. What does map Figure 1.2-5 tell West Salem residents?
2. What is the purpose and function of the two approximately 1.5 acre parcels north and south of Hope Avenue east of Marine Drive slated for inclusion within the Salem UGB?
3. How do either of these two parcels impact proposed development plans west of Marine Drive?
4. The narrative states Marine Drive north of Hope Avenue will remain a 60-foot wide collector so why are homes being slated for removal from the River Valley subdivision along the western edge of the future Marine Drive north of Hope Avenue?
5. The narrative states Marine Drive south of Hope Avenue will expand to a 72-foot wide minor arterial so why are no homes west of Marine Drive being slated for removal from Somerset Homes along the western edge of the future Marine Drive south of Hope Avenue?
6. How will bicycle riders living in residents between Wallace Road and Marine Drive access the bike/pedestrian path on the east side of arterial Marine Drive south of Hope Avenue?
7. Will all properties south Hope Avenue have both north and south driveway access to Marine Drive?
8. Will currently under construction River Valley Drive have access to the expanded Hope Avenue east of Wallace Road?
9. What does map Figure 1.2-7: tell West Salem residents?
10. What is the interface between the Preferred Alternative shown in Figure 1.2-7 and the proposed Wallace Road underpass, westward expansion of 2<sup>nd</sup> Street and the proposed new linking intersection with the Marion Bridge off ramp?
11. From which properties will the 72-foot expanded Marine Drive right-of-way width be extracted along the current 60-foot Marine right-of-way paralleling Wallace Marine Park south of Glen Creek?

Received At Council Meeting

Meeting Date: 10/12/16

Agenda Item: \_\_\_\_\_

Received by: E. M. Easterly

From: JH

12. How will the proposed Marine Drive bike/pedestrian path interface with the proposed 2<sup>nd</sup> Street bike/pedestrian path access to the railroad bridge?
13. Why is additional right-of-way across the unnamed drainage north of Glen Creek Road into Wallace Marine Park being proposed?
14. How does the 0.27 foot modeled elevation rise relate to the two separate 25 acre impact declarations cited in (a) **FINDINGS IN SUPPORT OF GREENWAY GOAL EXCEPTION SRC PROJECT FINDINGS REPORT** Table 18 and (b) **Land Use Final Technical Report Addendum** "25 acres of new surface-level right-of-way within FEMA's 100-year floodplain" Page 4-15?
15. Will fill or piers be used to construct the proposed roundabout in the flood plain at Marine Drive and River Bend Road and how does this decision impact the modeled increase in the flood plain elevation?
16. Will you read the 26 staff reports, the 46 technical reports and the multiple documents submitted in support of the oral testimony before rendering your decision?
17. For 19 years the Marine Drive right-of-way has been identified as a 60-foot Collector roadway. Why now is the proposed Marine Drive right-of-way being increased to a 72-foot Minor Arterial right-of-way from River Valley Drive southward without public review before embarking upon the current quasi-judicial Salem Transportation System Plan revision?
18. Why are storm water detention facilities proposed that will replace homes in the River Valley subdivision?

## 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."



# SALEM - KEIZER TRANSIT

555 Court St. NE, Ste. 5230  
Salem, OR 97301-3980

(503) 588-2424 Fax (503) 566-3933  
www.cherriots.org



Date: October 12, 2016

To: Cities of Keizer and Salem  
Marion and Polk Counties

From: Director Kathy Lincoln  
SAMTD Board of Directors

Re: Testimony on behalf of Salem Area Mass Transit District at the Joint Public Hearing on Land Use Action to Support the Salem River Crossing Preferred Alternative

Received At Council Meeting

Meeting Date: 10/12/16

Agenda Item:

Received by: Kathy Lincoln

From: [Signature]

Good evening, I am Kathy Lincoln, board member, Salem Area Mass Transit District. I am speaking this evening on behalf of the Board of Directors.

The Salem Area Mass Transit District Board of Directors opposes the current process to expand the city's Urban Growth Boundary and amend of the Transportation System Plan for the following reasons:

- The current Preferred Alternative has been altered from the alternative that was endorsed by the Board of Directors in April 2014
- As a member of the Salem River Crossing Oversight Team, the Transit District Board has not had an adequate opportunity to evaluate the:
  - Traffic and Transportation Tech report
  - Land Use Tech Report
  - Construction, geology and other technical reports that were made public just days ago.

These reports describe how the Preferred Alternative operates, what impacts it has on the neighborhoods and traffic system, and how well public transit will operate on the system. This is the first information we have seen about the proposed bridge since the last Oversight Team meeting in December 2014. There has not been sufficient time to review this information and make an informed decision.

The Transit District participated in funding the Alternate Modes Study, which was released in April 2010. There appears to be no desire to include projects from this study as part of the river crossing project. These projects will help reduce congestion at the current bridge heads.

Before committing to an expensive, new highway and bridge, the Board would like to work with the other oversight members to implement the projects in the Alternate Modes Study, including support for transit amenities.

Additionally, at this time, there is no firm decision about which jurisdiction will operate and maintain the new bridge and highway after it is built. We have not seen information regarding how that will affect the city's streets and bridges maintenance budget, which impacts how well the district's buses operate. A facility that big will require considerable maintenance funds which will presumably come from the city's budget. We have seen no plan to pay for the continued maintenance of the bridge over the years.

The proposed Project Funding Strategy, dated March 6, 2015 (a copy is attached) has not been carefully vetted and would impact the ability to raise funds for other public services in this community. Before adding the Preferred Alternative to the city's TSP, area residents should be allowed to weigh in on potential funding options including a local gas tax increase, tolling, increased vehicle registration fees and property taxes.

The Project Funding Strategy assumes that the Mid-Willamette Valley Area Commission on Transportation will agree to set aside multiple years of its allotment of state funds to help pay for the bridge. There is no commitment from the ACT on that.

If the proposed funding plan is implemented it will make a significant dent in the amount of public funds left over in this community for other services, such as police and public transit.

Although we would welcome the opportunity to work with the oversight team jurisdictions to resolve these concerns, the current action is premature and speculative and the Transit District Board does not support it.

Sincerely,

A handwritten signature in black ink that reads "Kathy Lincoln". The signature is written in a cursive, flowing style.

Kathy Lincoln  
Board of Directors



## Project Funding Strategy Memorandum

TO: Project Oversight Team  
FROM: Project Management Team  
DATE: March 6, 2015

### 1. Purpose

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Key points discussed by OT members with respect to the development and selection of a conceptual funding strategy are paraphrased below:

- Based on a review of funding plans for other projects and the contribution those projects have received from federal and state funding sources, one OT member suggested that it was reasonable to anticipate project funding contributions being approximately 50% from local revenue sources and 50% from state and federal sources. This project has the same ability to affect the state as Pioneer Mountain-Eddyville (Hwy. 20), the Newberg-Dundee bypass, and the I-5 interchange area in Woodburn, which all received a high percentage of state funding.
- A goal of this discussion was to keep the initial funding strategy broad enough that future elected officials will have flexibility to propose politically viable options to voters.
- The point was emphasized that this is a conceptual funding strategy and no decisions regarding actual funding commitments are being made. The funding strategy being developed is just a framework to move forward.
- With regard to phasing, the OT agreed that the best scenario would be that all project phases would be constructed concurrently within a short time period. This is a regional project and all the proposed project elements are needed to create a safer, more efficient system and provide regional benefit.
- Using property tax as a revenue source was felt to have limited utility with the exception of funding Marine Drive, which could potentially be funded with a City of Salem property tax. Marine Drive has independent value, is already in the City's transportation system plan (TSP) and City residents have approved transportation improvement property taxes in the past (the most recent in 2008). Some private dollars may be collected from adjacent developments to contribute to the construction of Marine Drive.
- A source of state and federal funding discussed was the Statewide Transportation Improvement Program (STIP) which includes federal and state funds. The Mid-Willamette Valley Area Commission on Transportation (MWACT) has a role in recommending projects that would use these funds. It would take approximately three years to construct the bridge, another year for Marine Drive, and two years to construct the ramps, so that would allow six or seven years to accumulate funding through future potential recommendations by MWACT to set aside funds in the STIP for these projects. The last STIP allocation for MWACT was approximately \$17 million. Over three STIP cycles a potential of \$30-50 million could be allocated for the project. This is ODOT



Enhance Program money, but it is primarily federal dollars. If \$45 million in Enhance Program money was allocated to this project, that would break down to approximately \$5 million in state dollars and about \$40 million in federal funds. It was agreed that this money should be added into the initial funding strategy - it would be reasonable to anticipate this funding amount and it may be more reliable than some of the other local revenue sources.

- Raising more than a few million dollars of state funding would require state legislative action similar to the 2009 Jobs and Transportation Act (JTA), so some felt it may not be realistic to suggest that \$150 million of state funding could be secured, but the OT agreed that it should remain in the funding strategy as a source of revenue that should be pursued.
- Raising local revenue for this project through a gas tax and/or vehicle registration fee may be more successful if the project was part of a regional package of projects.
- Tolling allows for a broader funding base - the cost burden would not fall only on local residents. There should however be price reductions for seniors and low-income people if tolls were installed.
- It was suggested that a more reasonable revenue amount to be raised through tolling would be based on a toll of \$1.50, which would raise \$175 million. This funding could be used to construct the new bridge or some portion of the ramp connections to Hwy 22.

## 4. Recommended Funding Strategy

Following the discussion summarized in Section 3 of this memorandum, the funding strategy for the SRC Preferred Alternative was revised by the OT and is shown in Table 2.

**Table 2: Recommended Funding Strategy**

Project Phase	Cost	Funding Source					
		FEDERAL	STATE	LOCAL	LOCAL	City of Salem	LOCAL
				Gas Tax	Vehicle Reg. Fee	Property Tax	Tolling
Phase B	\$300,000,000	\$20 M*	\$5 M* \$75 M**	\$65 M	\$65 M	--	\$175 M
Phase M-South	\$20,000,000					\$20 M	
Phase M-North	\$10,000,000					\$10 M	
Phase R	\$100,000,000	\$20 M*	\$75 M**	\$20 M	\$20 M		
<b>Total Project Cost</b>	<b>\$430,000,000</b>	<b>\$40 M*</b>	<b>\$5 M*</b> <b>\$150 M**</b>	<b>\$85 M</b>	<b>\$85 M</b>	<b>\$30 M</b>	<b>\$175 M</b>
Tax/Fee/Toll necessary to generate revenue shown				\$.06/Gallon	\$25/Year	\$0.37/\$1K	\$1.50/crossing

**M = Million**

\*Potential MWACT STIP allocation

\*\* Would require legislative action

To reiterate, the sum of all the funding amounts proposed exceeds the revenue needs of the project and should be viewed as suggested maximum values that could potentially be secured with each of the funding sources. The development of financial plans for large transportation infrastructure projects such as this is an iterative process where the funding strategies are often modified based on the success or failure in securing funding.

## References

ECONorthwest. November 12, 2014. *Salem River Crossing Revenue Projections Memorandum*.

Federal Highway Administration (FHWA). December 18, 2014. *Major Project Financial Plan Guidance*.