



11 June 2022

**TO:** Mayor and City Council

**RE:** Agenda Item 4.c. 22-102  
Comprehensive Plan Map Amendment & Zone Change  
2100 Doaks Ferry Rd NW

**FR:** Steven A. Anderson, West Salem Neighborhood Association Land Use Chair

Mr. Mayor & Council: **Point of Order** per Roberts Rules of Order before I start my verbal testimony tonight.

Since the WSNA is the Petitioner in this quasi-judicial hearing tonight, are we not an “Affected Party” and presenting as such, and should we not be afforded the same standing as the applicant (a level playing field without prejudice) and granted 15 minutes of presentation time in this highly technical, data intensive case? So, say you?

**GIVEN**

1. ODOT has jurisdiction over Wallace Road NW (OR 221).
2. The Oregon Highway Plan (OHP) provides that OR 221 is a regional highway.
3. Salem is within the Mid-Willamette Valley Council of Governments Metropolitan Planning Organization (MPO).
4. The mobility standard for OR 221 is a V/C ratio of 0.95 per Table 6 of the OHP.
5. The applicant proposed a trip cap of 500 units with 2,270 ADTs to mitigate significant traffic impacts at Wallace Rd (OR 221) and Glen Creek (Council Staff Report CPC-ZC21-06, Condition 1).
  - a. “Condition 1: The transportation impacts from the 28.84-acre site shall be limited to a maximum 500 multi-family units and a cumulative total of 2,270 average daily vehicle trips”.
6. The applicant’s revised traffic impact analysis showed that the proposed trip cap (Condition 1) failed to meet the 0.95 mobility standard (OHP 1F.5) at Wallace Rd and Glen Creek.
  - a. 1.02 AM Peak, E Level of Service (LOS)
  - b. 1.18 PM Peak, F Level of Service (LOS)



**Table 10. Summary of 2036 Traffic Conditions**

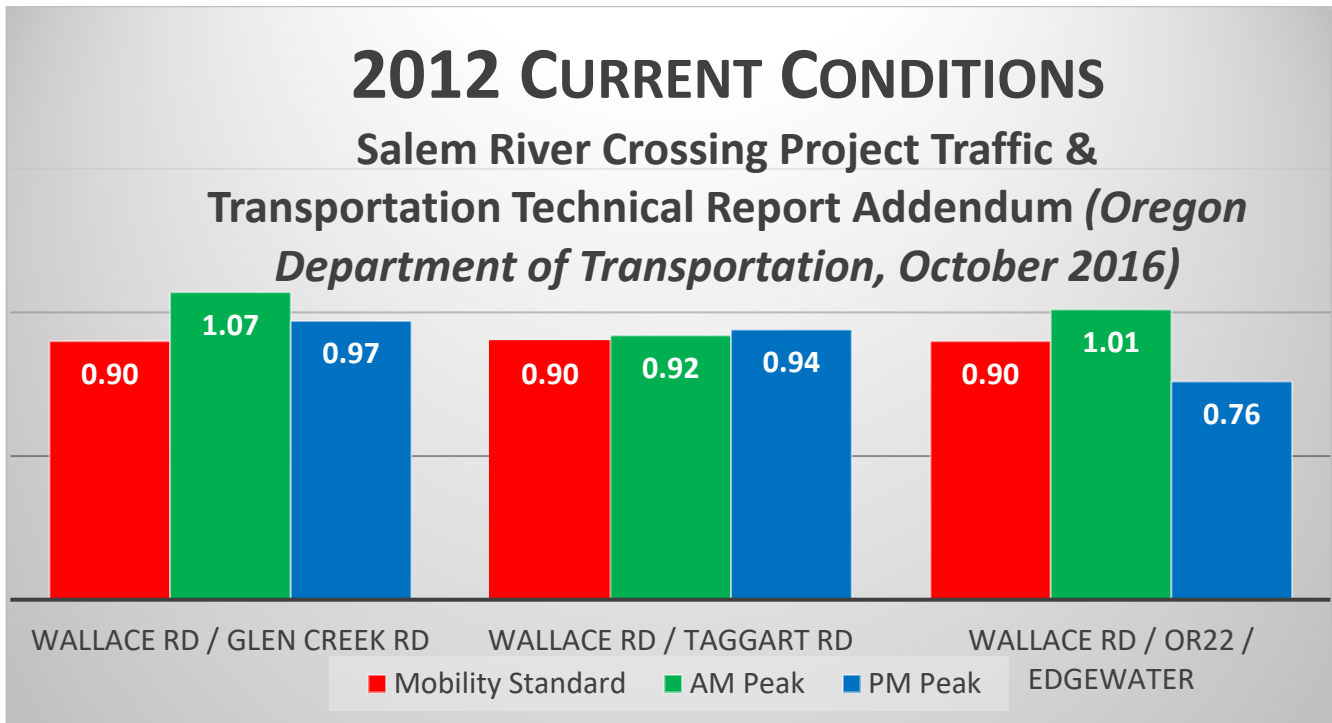
Intersection	Performance Standard	Weekday AM Peak Hour				Weekday PM Peak Hour/30 <sup>th</sup> Highest Hour			
		LOS	Delay (sec)	v/c Ratio	95 <sup>th</sup> % Queue	LOS	Delay (sec)	v/c Ratio	95 <sup>th</sup> % Queue
<b>Year 2036 Existing Zoning Conditions</b>									
4: Wallace Rd/ Glen Creek Rd	v/c ≤ 0.95	D	51.1	<b>0.99</b>	EB L: 110 ft EB T: 155 ft EB R: 390 ft WB L: 115 ft WB TR: 90 ft NB L: 155 ft NB T: 585 ft NB R: 15 ft SB L: 20 ft SB TR: 1020 ft	F	96.1	<b>1.17</b>	EB L: 110 ft EB T: 180 ft EB R: 145 ft WB L: 180 ft WB TR: 365 ft NB L: 365 ft NB T: 1285 ft NB R: 145 ft SB L: 55 ft SB TR: 1050 ft
<b>Year 2036 Proposed Zoning Conditions</b>									
4: Wallace Rd/ Glen Creek Rd	v/c ≤ 0.95	E	55.1	<b>1.02</b>	EB L: 110 ft EB T: 155 ft EB R: 355 ft WB L: 115 ft WB TR: 90 ft NB L: 160 ft NB T: 595 ft NB R: 15 ft SB L: 20 ft SB TR: 1050 ft	F	100.6	<b>1.18</b>	EB L: 110 ft EB T: 180 ft EB R: 150 ft WB L: 180 ft WB TR: 365 ft NB L: 375 ft NB T: 1305 ft NB R: 145 ft SB L: 50 ft SB TR: 980 ft

**BOLD:** Performance standard not met

7. WSNA requested that the Salem River Crossing traffic analysis, The Riverbend Phase II TIA, and the Salem Congestion Relief Task Force final study be included for and be part of staff's analysis (attached in your Council Packet for tonight's public hearing).
8. These studies were denied by staff and staff's traffic engineer said that "they were irrelevant" with no reason for this statement.
9. These studies are relevant and material to the mitigation findings presented in Condition 1 within Council Staff Report (CPC-ZC21-06).
10. All three of these reports and their traffic analyses show sufficient evidence that the applicant's revised TIA under estimates the level of traffic impacts of the proposed trip cap mitigation at Wallace Rd and Glen Creek.
11. For example. The 2012 current traffic conditions at Wallace Rd and Glen Creek showed a V/C of 1.07 AM Peak.
  - a. The applicant's revised TIA showed a 2036 V/C AM peak of 1.02
  - b. After adding 2,272 trips to the system the applicant's analysis is lower in 2036 than what was actually measured in 2012
  - c. Sufficient evidence to conclude the applicant's revised TIA under estimates level of traffic impacts at Wallace Rd and Glen Creek



12. The figure below shows that the actual traffic volume v/c ratio is higher than the applicant’s revised TIA 2036 projected traffic v/c impacts. Thus, the underlying base traffic numbers in the applicant’s revised TIA under estimate existing condition effecting calculated impacts now and in the future.



**STAFF’s POSITION** (Council Staff Report CPC-ZC21-06, page 4 of 6)

“The applicant is proposing to limit the site to 500 multi-family units. This will limit the traffic to 2,270 ADT, with a net increase of 544 ADT. The analysis shows the proposed increase in traffic does not result in a significant affect on the City managed facilities nor on the State managed facilities. The proposal complies with the Oregon Highway Plan Action 1F.5 because both the net increase is less than 1,000 ADT and the operational standard at the intersections does not increase more than 0.03.”

**This is not supported by the evidence presented in this application. We have submitted evidence that the applicant’s revised TIA demonstrates that the mitigation proposed in Condition 1 will significantly effect city and state managed facilities. Additionally, the 0.03 OHP 1F.5 increase is not complied with. V/C ratios are greater than 0.03.**

**The criteria not meet. Applicant has not met their burden of proof.**



## **PETITIONER's POSITION**

ODOT's mobility standard requires the Wallace Road intersections to operate with a v/c ratio of 0.95 or less.

1. There are significant traffic impacts shown by the applicant's TIA from the propose Comprehensive Plan Map Amendment & Zone Change at Wallace Rd (OR 221) and Glen Creek
2. The proposed trip cap (Condition 1) does not comply with OHP 1F.5 standard at the intersections and it increases the V/C ration greater than 0.03 above the 0.95 mobility standard.
  - a. 1.02 AM V/C Peak (Level of Service E) **>0.95 OHP Mobility Performance Standard**
  - b. 1.18 PM V/C Peak (Level of Service F) **>0.95 OHP Mobility Performance Standard**
3. Furthermore, the proposed trip cap (Condition 1) does not meet the OHP 1F.5 "not net impact, no further degradation" requirement.
4. The applicant has not met the applicable city and state criteria for mitigating traffic impacts.
5. The applicant has not met their burden of proof.
6. More traffic analyses are necessary to find a proposed trip cap that will meet the OHP 1F.5 criteria.
7. Condition 1 fails to mitigate and comply with city and state mobility criteria.

## **PETITIONER's REQUEST**

The Petitioner request that City Council Reverse Planning Commission decision. Criteria not met.

Respectively,

Steven A. Anderson