The City has an established traffic safety committee (whose membership consists of city staff and a representative from the WLWV School District and Tualatin Valley Fire and Rescue), which meets on a monthly basis and oversees NTM issues among their other responsibilities. The committee has a set procedure for NTM implementation that starts with the identification of a perceived problem raised by concerned citizens, after which the committee conducts a speed/volume survey to identify if the problem exists. Once the committee identifies and classifies the problem, they discuss the various approaches to solving the problem. There are many different NTM options available to the committee. Typically, the committee starts with lower cost solutions, such as education and enforcement and if they deem that either of these solutions are not having the desired effect, the committee selects an engineering solution. The City and/or concerned citizens implement and fund the selected NTM solution. Often the city pays for the logistics of the NTM implementation and the citizens pay for the material costs.

The City should continue this effort with additional traffic calming measures (where applicable) and work with the community to find the traffic calming solution that best meets the needs of concerned citizens while maintaining roadway function. Table 12 lists common NTM applications that Tualatin Valley Fire and Rescue typically supports as long as minimum street criteria are met. Any NTM project should include coordination with emergency agency staff to ensure public safety is not compromised.

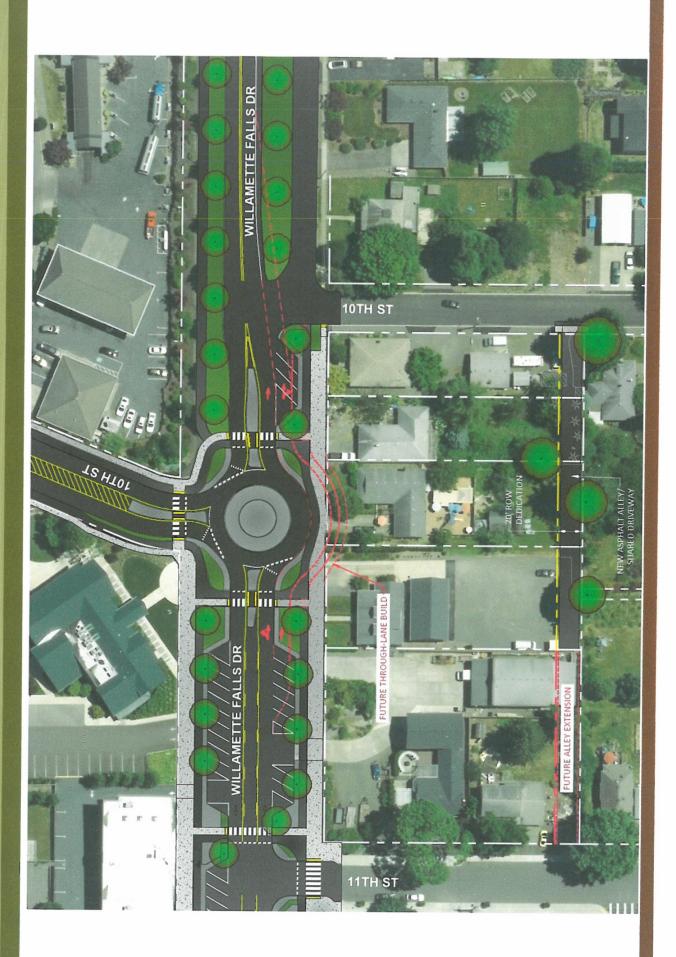
**Table 12: Traffic Calming Measures by Roadway Functional Classification** 

Traffic Calming Measures	Roadway Classifications		
	Minor Arterial	Collector	Neighborhood Route/ Local Street
Curb Extensions	Supported	Supported	
Medians	Supported	Supported	
Pavement Texture	Supported	Supported	Traffic Calming measures are generally supported on lesser response routes that have connectivity (more than two accesses) and are accepted and field tested by Tualatin Valley Fire and Rescue.
Speed Hump	Not Supported	Not Supported	
Raised Crosswalk	Not Supported	Not Supported	
Speed Cushion (provides emergency pass- through with no vertical deflection)	Not Supported	Not Supported	
Choker	Not Supported	Not Supported	
raffic Circle	Not Supported	Not Supported	
Diverter (with emergency vehicle pass through)	Not Supported	Supported	
Meandering Alignments	Not Supported	Not Supported	

Note: Traffic calming measures are supported with the qualification that they meet Tualatin Valley Fire and Rescue guidelines including minimum street width, emergency vehicle turning radius, and accessibility/connectivity.

## LAND USE

The types and intensities of land uses are closely correlated with travel demand. Land use patterns in many areas of the city are suburban in nature and low density, with more moderate densities near I-205 in the south part of the city. In the future, the city is envisioned in the Comprehensive Plan to be a mixture of housing densities and areas of mixed use development (e.g., a mix of residential, retail,



From:

Sent:

Wednesday, January 13, 2021 3:42 PM

To:

DANIELSON Marah B; Calvert, Lance(Icalvert@westlinnoregon.gov)

Cc:

Jimmy Houf; Kayla Fleskes; Brian K. Copeland;

elais@westlinnoregon.gov

Subject:

RE: 10th Street Interchange - City Contacts

#### Marah:

Any update on the review of this project? We are anxious to get feedback and move on to the next steps.

Thanks,

Ben

## Benjamin R. Austin, P.E.

Principal

# HARPER HOUF PETERSON RIGHELLIS INC.

205 SE Spokane Street | Suite 200 | Portland, OR | 97202 p: 503.221.1131 | m: 503.887.6746| <u>bena@hhpr.com</u>

CIVIL ENGINEERS :: STRUCTURAL ENGINEERS :: PLANNERS :: LANDSCAPE ARCHITECTS ::

From: DANIELSON Marah B < Marah.B.DANIELSON@odot.state.or.us>

Sent: Tuesday, December 15, 2020 6:11 PM

To: Ben Austin <BenA@hhpr.com>; Calvert, Lance (Icalvert@westlinnoregon.gov)

<lr><lcalvert@westlinnoregon.gov>

Cc: Jimmy Houf <JimmyH@hhpr.com>; Kayla Fleskes <kayla.fleskes@dksassociates.com>; Brian K.

Copeland <br/>
<br/>
copeland <br/>

Subject: RE: 10th Street Interchange - City Contacts

## [Email from external source]

Hi Ben,

Sorry for the delay in providing meeting notes and next steps for the City of West Linn project to improve 10<sup>th</sup> St within the I-205 interchange area. When you emailed the ODOT District 2B office back in May you wrote, "The City of West Linn is planning improvements to 10<sup>th</sup> Street through the I-205 interchange as part of a multi-modal improvement through the Willamette Falls Drive area. As part of the improvements the City would like to consider a roundabout at the northbound ramps to I-205. Attached is a preliminary traffic analysis and concept drawing." ODOT had been under the impression that the city only had funding for the planning phase (developing the conceptual design). Since the improvements being proposed are significantly different than what was adopted in the TSP update a few years ago, we thought that this was a planning exercise that would result in an update to the TSP.

From our meeting a few weeks ago it sounds like the city has funding for constructing the project. I have been assigned to manage the project through the planning phase and have informed management that the city has funding through construction of the project. I will be scheduling a meeting with our management team to discuss the project and transitioning the project from ODOT Planning to Project Delivery. A project manager will be assigned from Project delivery for

From:

Calvert, Lance

Sent:

Wednesday, January 13, 2021 4:15 PM

To:

Monica Krueger; Grace Cho

Subject:

RE: OR 43 project

We just completed Willamette Falls Drive from 10<sup>th</sup> to 16<sup>th</sup> (Main Street commercial district). That location has angled on street parking along with 4 way stop and 2 way stop intersections. We are currently designing the 10<sup>th</sup> Street corridor from Salamo Road to Willamette Falls Drive (including the 10<sup>th</sup> Street/I-205 interchange). That project is currently slated to include protected signalized intersections, a standard single lane roundabout, and a mini-roundabout. It will be under construction this winter and completed summer of 2022.

Unfortunately, I don't have a signalized intersection currently operational to showcase in town.

Intro videos I will likely share with the group. https://www.youtube.com/watch?v=FIApbxLz6pA https://www.youtube.com/watch?v=XpQMgbDJPok

There is one primary design difference between the City of West Linn and Dutch design. West Linn puts the priority on pedestrians over bikes. The Dutch do the opposite. So in West Linn, the sidewalk is continuous through the bike path and bikes yield to pedestrians. In the Dutch design, the bike path is continuous so peds yield to bikes. The West Linn way minimizes ADA conflicts and issues by giving the most vulnerable user priority. You can see that in our intersection standard details located at the link below.

https://westlinnoregon.gov/publicworks/standard-drawings

We have been studying this since 2014 including adoption of our TSP in 2016. A lot of little items and details go into the intersection design to make it work at maximum efficiency and safety while simultaneously meeting federal requirements. When retrofitting into existing intersections, it isn't super easy and takes thought on the part of the designer. I should write a book on the subject if I ever get some down time, sort of an American version of the Dutch CROW Manual.

If you want to come out and check out Willamette Falls Drive just let me know when and I'll meet you over there.

Lance

From: Monica Krueger [mailto:Monica.Krueger@oregonmetro.gov]

Sent: Tuesday, January 12, 2021 4:41 PM

To: Calvert, Lance <lcalvert@westlinnoregon.gov>; Grace Cho <Grace.Cho@oregonmetro.gov>

Subject: RE: OR 43 project

Hi Lance,

Does the City of West Linn have an protected intersections constructed that you can share with me as examples?

Thanks!

Monica

Cc: Lais, Erich < elais@westlinnoregon.gov>; Ben Austin < BenA@hhpr.com>; Brian Copeland <br/>
<br/>
bkc@dksassociates.com>

Subject: FW: 10th Street Interchange - City Contacts

Gabe/Marc.

Let's make sure the WFD concept plan has 10<sup>th</sup> Street and the completed downtown work in the drawings to capture the work DKS and HHPR have done. A lot has changed since the original TSP adoption and we should address/include it in our work.

Thanks and Happy Holidays,

Lance

From: Lais, Erich

Sent: Tuesday, December 22, 2020 2:54 PM

To: Ben Austin < Ben A @hhpr.com >; Marah Danielson < marah.b.danielson@odot.state.or.us >;

Calvert, Lance < <a href="mailto:lcalvert@westlinnoregon.gov">lcalvert@westlinnoregon.gov</a>>

Cc: Jimmy Houf < Jimmy H@hhpr.com >; Kayla Fleskes < kayla.fleskes@dksassociates.com >; Brian K.

Copeland < bkc@dksassociates.com>

Subject: RE: 10th Street Interchange - City Contacts

Marah,

I think Ben touched on all the key aspects. Now that the first phase of this project is wrapping up, HHPR will finalize the design for phase 2 which includes the 10<sup>th</sup> Street corridor through construction. You are correct, funding for these projects are from the 2018 GO Bond.

It sounds like we have a path forward but please let us know if there is anything else we need to

Thanks!

From: Ben Austin [mailto:BenA@hhpr.com] Sent: Wednesday, December 16, 2020 7:18 AM

To: Marah Danielson < marah.b.danielson@odot.state.or.us >; Calvert, Lance

<<u>lcalvert@westlinnoregon.gov</u>>

Cc: Jimmy Houf < <a href="mailto:limmyH@hhpr.com">! Kayla Fleskes < kayla.fleskes@dksassociates.com</a>; Brian K.

Copeland < bkc@dksassociates.com >; Lais, Erich < elais@westlinnoregon.gov >

Subject: RE: 10th Street Interchange - City Contacts

#### Marah:

I will let Lance or Erich weigh in as well, but I can provide a little context. HHPR was hired in 2019 to complete improvements along Willamette Falls Drive, 10<sup>th</sup> Street and Blankenship/Salamo. Initially we did a 30% level design of the entire corridor. The 10<sup>th</sup> Street segment included improvements consistent with TSP. The first phase of work was the Willamette Falls Drive corridor so that was the focus. When we picked back up the design for the 10<sup>th</sup> Street interchange the City/Design Team discussed modifying the design to consider a roundabout at the interchange as a way to better achieve the goals of the project. We have always anticipated sending plans through the maintenance office, but realized that diverging from the TSP with a roundabout

the plan review through construction. Once I have more direction from management, I will provide an update to the city and consultant team.

For our management team meeting about this project, I have been asked to provide background on how the project went so quickly from the planning process to being funded for construction. From the city's website it looks like this project is funded through a bonding measure passed in 2018. It is my understanding that ODOT Planning was involved with the TSP update in 2016, but has not engaged about the current project until May of this year.

I have included Lance Calvert the city's project manager and am hoping that one of you can provide me with background information to prepare for my meeting.

Thanks,

Marah Danielson, Senior Planner ODOT Development Review Program Marah.b.danielson@odot.state.or.us 503.731.8258

From: Ben Austin < BenA@hhpr.com > Sent: Monday, November 23, 2020 10:52 AM

To: DANIELSON Marah B < Marah.B.DANIELSON@odot.state.or.us>

Cc: Jimmy Houf < <u>JimmyH@hhpr.com</u>>; Kayla Fleskes < <u>kayla.fleskes@dksassociates.com</u>>; Brian K.

Copeland < bkc@dksassociates.com >

Subject: 10th Street Interchange - City Contacts

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Marah:

Thanks so much for setting up the meeting today. Below is the contact info for Lance and Erich. Erich is the PM and Lance is the Public Works Director. Both should be included.

Lance Calvert
Public Works Director
Public Works
customerservice-water

22500 Salamo Rd West Linn, Oregon 97068 <u>icalvert@westlinnoregon.gov</u> westlinnoregon.gov 503-722-3424

Erich Lais
Assistant City Engineer
Public Works
customerservice-water

22500 Salamo Road West Linn, Oregon 97068 <u>elais@westlinnoregon.gov</u> westlinnoregon.gov 503-722-3434 would require additional approvals and planning related work and thus the reason we contacted you.

Have you received internal feedback on the proposal of a roundabout?

Thanks,

Ben

Benjamin R. Austin, P.E.

Principal

HARPER HOUF PETERSON RIGHELLIS INC. 205 SE Spokane Street | Suite 200 | Portland, OR | 97202 p: 503.221.1131 | m: 503.887.6746| <u>bena@hhpr.com</u>

CIVIL ENGINEERS :: STRUCTURAL ENGINEERS :: PLANNERS :: LANDSCAPE ARCHITECTS :: **SURVEYORS** 

From: DANIELSON Marah B < Marah.B.DANIELSON@odot.state.or.us>

Sent: Tuesday, December 15, 2020 6:11 PM

To: Ben Austin < BenA@hhpr.com >; Calvert, Lance (lcalvert@westlinnoregon.gov)

<lcalvert@westlinnoregon.gov>

Cc: Jimmy Houf < <u>JimmyH@hhpr.com</u>>; Kayla Fleskes < <u>kayla.fleskes@dksassociates.com</u>>; Brian K.

Copeland < bkc@dksassociates.com >; elais@westlinnoregon.gov

Subject: RE: 10th Street Interchange - City Contacts

#### [Email from external source]

Hi Ben.

Sorry for the delay in providing meeting notes and next steps for the City of West Linn project to improve  $10^{\mathrm{th}}$  St within the I-205 interchange area. When you emailed the ODOT District 28 office back in May you wrote, "The City of West Linn is planning improvements to 10<sup>th</sup> Street through the I-205 interchange as part of a multi-modal improvement through the Willamette Falls Drive area. As part of the improvements the City would like to consider a roundabout at the northbound ramps to I-205. Attached is a preliminary traffic analysis and concept drawing." ODOT had been under the impression that the city only had funding for the planning phase (developing the conceptual design). Since the improvements being proposed are significantly different than what was adopted in the TSP update a few years ago, we thought that this was a planning exercise that would result in an update to the TSP.

From our meeting a few weeks ago it sounds like the city has funding for constructing the project. I have been assigned to manage the project through the planning phase and have informed management that the city has funding through construction of the project. I will be scheduling a meeting with our management team to discuss the project and transitioning the project from ODOT Planning to Project Delivery. A project manager will be assigned from Project delivery for the plan review through construction. Once I have more direction from management, I will provide an update to the city and consultant team.

For our management team meeting about this project, I have been asked to provide background on how the project went so quickly from the planning process to being funded for construction. From the city's website it looks like this project is funded through a bonding measure passed in 2018. It is my understanding that ODOT Planning was involved with the TSP update in 2016, but has not engaged about the current project until May of this year.



# Memorandum

Date:

March 29, 2022

To:

Jules Walters, Mayor

Members, West Linn City Council

From:

Darren Wyss, Planning Manager

Subject:

10th Street Corridor Projects and TSP Amendments

In a letter dated March 12, 2022 (attached), Teri Cummings questioned whether the 10<sup>th</sup> Street Corridor Improvements should have been required to go through a transportation system plan update, which is a legislative comprehensive plan amendment requiring notice to the Department of Land Conservation and Development (DLCD) and public hearings with the West Linn Planning Commission and City Council. The West Linn Willamette Falls Drive 2021 Conceptual Design Plan recently went through this process.

After reviewing state statutes, state administrative rules, consulting with DLCD, reviewing comprehensive plan polices, and reviewing the adopted West Linn Transportation System Plan (TSP), the answer to the question is no, it is not a requirement to amend a transportation system plan during the transportation project development phase. Improvements to 10<sup>th</sup> Street and the I-205 interchange were identified and included in the TSP and are now simply going through the project development phase. Staff found no comprehensive plan policy that prohibits the use of roundabout design to improve intersection safety and function.

Oregon Administrative Rule (OAR) 660-012, also known as the Transportation Planning Rule (TPR), outlines what is required to be included in the TSP and what necessitates a TSP amendment be undertaken. More specifically, OAR 660-012-0005, OAR 660-012-010, and OAR-660-012-0040 contain the precise language.

#### OAR 660-012-0005

(15) "Minor transportation improvements" include, but are not limited to, signalization, addition of turn lanes or merge/deceleration lanes on arterial or collector streets, provision of local streets, transportation system management measures, modification of existing interchange facilities within public right of way and design modifications located within an approved corridor. Minor transportation improvements may or may not be listed as planned projects in a TSP where the improvement is otherwise consistent with the TSP. Minor transportation improvements do not include new interchanges; new approach roads within the influence area of an interchange; new intersections on limited access roadways, highways or expressways; new collector or arterial streets, road realignments or addition of travel lanes.

The TSP included improvements to  $10^{th}$  Street based on system-wide transportations needs and current comprehensive plan land use designations.  $10^{th}$  Street is part of the network of facilities to meet overall transportation needs. The phase of identifying the specific design of the  $10^{th}$  Street improvements is a

"minor transportation improvement" per the definition and not required to be listed in the TSP as they are considered part of the implementation phase.

#### 660-012-0010

#### **Transportation Planning**

(1) As described in this division, transportation planning shall be divided into two phases: transportation system planning and transportation project development. Transportation system planning establishes land use controls and a network of facilities and services to meet overall transportation needs. Transportation project development implements the TSP by determining the precise location, alignment, and preliminary design of improvements included in the TSP.

The adopted TSP established land use controls and a network of facilities and services to meet overall transportation needs. This planning phase identified needs for all transportation users, including vehicular, bicycle, pedestrian, and transit. The 10<sup>th</sup> Street improvements are considered minor transportation improvements in the project development phase and implement the TSP. Amending the TSP is not required for the transportation project development phase.

#### 660-012-0040

## **Transportation Financing Program**

- (1) For areas within an urban growth boundary containing a population greater than 2,500 persons, the TSP shall include a transportation financing program.
- (2) A transportation financing program shall include the items listed in (a)–(d):
- (a) A list of planned transportation facilities and major improvements;
- (b) A general estimate of the timing for planned transportation facilities and major improvements;
- (c) A determination of rough cost estimates for the transportation facilities and major improvements identified in the TSP; and
- (d) In metropolitan areas, policies to guide selection of transportation facility and improvement projects for funding in the short-term to meet the standards and benchmarks established pursuant to 0035(4)—(6). Such policies shall consider, and shall include among the priorities, facilities and improvements that support mixed-use, pedestrian friendly development and increased use of alternative modes.

The phase of identifying the specific design of the 10<sup>th</sup> Street improvements is a "minor transportation improvement" per the definition and considered as part of the implementation phase. Only "major" improvements, such as new roadways, interchanges, or road realignments are required to be adopted into the TSP.

Staff has also provided answers to Ms. Cummings primary questions regarding the appropriate process that the City is required to follow.

 Thus, I am curious to know if the WFD Conceptual Design Plan would be found to be in compliance with <u>ORS 197</u> and <u>West Linn CDC- Chapter 100 Comprehensive Plan amendment</u> <u>criteria</u> if it was reviewed by the Department of Land Conservation and Development (DLCD) or West Linn's CCI.

Ordinance 1726 adopted the West Linn Willamette Falls Drive 2021 Conceptual Design Plan. A 35-day post acknowledgement plan amendment (PAPA) notice was sent to DLCD on May 11, 2021 as required by Oregon Revised Statute (ORS) 197.610. A PAPA notice of adoption was sent to DLCD on August 19, 2021 as required by ORS 197.615. No appeal was filed by a party of record as allowed under ORS 197.620 and the adoption was acknowledged by the state on September 10, 2021.

2. I have a need for clarity as to why staff appears to be using two different procedures to propose changes to the 2016 TSP plan. The first method utilized the WFD Conceptual Design Plan amendment process to change the 2016 TSP. The second method involves placing an item on the City Council agenda to approve a contract, thus somehow approving changes to the 10<sup>th</sup> Street Interchange area of the 2016 TSP without undergoing the usual public involvement process required in CDC Chapter 100 or 98.

The West Linn Willamette Falls Drive 2021 Conceptual Design Plan did not meet the OAR 660-012-0005 definition of a "minor transportation improvement" as it included a realignment of Willamette Falls Drive through the mill parking lot. This realignment allows the intersection of Highway 43 and Willamette Falls Drive to function with a roundabout design. Thus, a comprehensive plan amendment was proposed and adopted under the PAPA rules. Additionally, the concept plan provides direction on a cycle track design from the Tualatin River to the Highway 43 intersection, including a significant section where the improvements are wider and limited to only one-side of the roadway. Adopting the concept plan as part of the TSP allows the improvements to be eligible for federal, state, and regional funding, as well as providing certainty to property owners and developers on the extent of improvements that will be required.

3. I need to know if West Linn notified DLCD, according ORS 197.612 that West Linn planned to propose changes to West Linn's adopted 2016 TSP regarding the 10th Street corridor area? If so, when was the notice sent? If not, what remedy is available?

No notice is required as the 10<sup>th</sup> Street improvements are considered "minor transportation improvements" and part of the transportation project development phase. See previous discussion regarding the Transportation Planning Rule (OAR 660-012).

If you have questions, please feel free to email or call me at <a href="mailto:dwyss@westlinnoregon.gov">dwyss@westlinnoregon.gov</a> or 503-742-6064. Thanks.

### April 6, 2022

Dear Mayor Jules Walters, City Councilors, Planning Commission Chair Gary Walvatne, Planning Commissioners, Committee for Citizen Involvement Chair Shannen Knight and fellow CCI members,

I am writing to you to express my concern about the need for public involvement in all phases of the planning process. I am particularly concerned about Planning Manager Mr. Wyss' opinion that proposed changes to the 2016 Transportation System Plan (TSP) for the 10th street interchange area should be defined as "minor transportation improvements" because that would justify not noticing or engaging community members in the public hearings process as would be the requirements if the changes proposed were defined as "major transportation improvements."

I hope we all agree that the 10th Street/I-205 interchange area is of <u>major significance</u> to West Linn and the surrounding area. As a primary route to and from the Willamette area with four I-205 ramps; this heavily trafficked, problematic corridor definitely serves much more than the "<u>immediate neighborhood.</u>" I believe this also qualifies as "major" because many of the proposed improvements are <u>significantly different</u> from the text, maps and plan in the adopted 2016 TSP, plus many of the changes are discretionary, which is why we have public hearings.

To be clear, this letter is not about the proposed improvements; this is about questioning whether it makes sense to define the proposed 10<sup>th</sup> Street/ I-205 interchange area concept plan as "minor improvements." It is important to know that doing so deprives members of our community from the right to be informed and engaged in matters that affect them. Leaving people out of the planning process erodes trust. We need to keep people in the planning process

The fact that the proposed improvements are inconsistent with West Linn's 2016 TSP is validated ODOT's Senior Planner Marah Danielson in her Dec. 15, 2020 email titled 10<sup>th</sup> Street Interchange-City Contacts: to: Ben Austin HHPR, West Linn's Lance Calvert and Erich Lais and three other associates as follows, "The improvements being proposed are significantly different than what was adopted in the 2016 TSP update a few years ago, we thought this was a planning exercise that would result in an update to the TSP...From our management meeting about this project, I have been asked to provide background on how the project went so quickly from the planning process to being funded for construction. From the City's website it looks like the project is funded through a bonding measure passed in 2018. It is my understanding that ODOT Planning was involved with the TSP update in 2016, but has not engaged about the current project until May of this year. I have included Lance Calvert the city's project manager and am hoping that one of you can provide me with background information to prepare for my meeting. Thanks, Marah Danielson, Senior Planner, ODOT Development Review Program."

Mr. Ben Austin appeared to agree when he replied the next day: "I will let Lance or Erich weigh in as well, but I can provide a little context. HHPR was hired to complete improvements along Willamette Falls Drive, 10<sup>th</sup> Street and Blankenship/Salamo. Initially we did a 30% level design of the entire corridor. The

10<sup>th</sup> street segment included improvements consistent with TSP. The first phase of work was the Willamette Falls Drive corridor so that was the focus. When we picked back up the design for the 10<sup>th</sup> Street Interchange the City/Design Team discussed modifying the design to consider a roundabout at the interchange as a way to better achieve the goals of the project. We have always anticipated sending plans through the maintenance office, but realized that diverging from the TSP with a roundabout would require additional approvals and planning related work and thus the reason we contacted you. Have you received internal feedback on the proposal of a roundabout? Thanks, Ben."

The change in 2020 to include two roundabouts in the 10<sup>th</sup> Street/I-205 corridor is not what Council or the public envisioned when the GO Bond was approved by the voters. As one of the former City Councilors who put Go Bond Measure 3-527 on the ballot in 2018. We expected a fully engaged public involvement process when we signed the Historic Willamette and 10<sup>th</sup> Stree design contract shortly after voters passed the ballot.

I am deeply disappointed in the position our Planning Manager took against undergoing a public engagement process to approve changes to the 2016 TSP, as stated in this March 29, 2022 memo; "It is not a requirement to amend a transportation system plan during the transportation project development phase. Improvements to 10<sup>th</sup> Street and the I-205 interchange were identified and included in the TSP and are now simply going through the project development phase. Staff found no comprehensive plan policy that prohibits the use of roundabout design to improve intersection safety and function."

Here is the legal definition of "Major."

OAR 660-012-00005 Definition, (12) "Major."

(11)"Major" means, in general, those facilities or developments which, considering the size of the urban or rural area and the range of size, capacity or service level of similar facilities or developments in the area, are either larger than average, serve more than neighborhood needs or have significant land use or traffic impacts on more than the immediate neighborhood:

(a) "Major" as it modifies transit corridors, stops, transfer stations and new transportation facilities means those facilities which are most important to the functioning of the system or which provide a high level, volume or frequency of service;

**(b)** "Major" as it modifies industrial, institutional and retail development means such developments which are larger than average, serve more than neighborhood needs or which have traffic impacts on more than the immediate neighborhood;

(c)Application of the term "major" will vary from area to area depending upon the scale of transportation improvements, transit facilities and development which occur in the area. A facility considered to be major in a smaller or less densely developed area may, because of the relative significance and impact of the facility or development, not be considered a major facility in a larger or more densely developed area with larger or more intense development or facilities.

Here is the legal definition of "Minor."

OAR 660-012-005(15) "Minor Transportation Improvements" Include but are not limited to; signalization, addition of turn lanes or merge/deceleration lanes on arterial or collector streets, provision of local streets, transportation system management measures, modifications of existing interchange facilities within public right of way and design modifications located within an approved corridor. Minor transportation improvements may or may not be listed as planned projects in a TSP where the improvement is otherwise consistent with the TSP. Minor transportation improvements do not include new interchanges: new approach roads within the area of influence area of an interchange; new intersections on limited access roadways; highways or expressways; new collector or arterials streets, road alignments or addition of travel lanes.

The proposed changes do not appear to meet the definition of "Minor" because:

- 1. The changes are not consistent with the textual description and plan, nor the maps adopted in the 2016 TSP. ( Details provided below under the definition of "Major")
- 2. The changes include making improvement for a "future alley way" and a "future through lane."
- 3. The "future alley way" and the "future through lane" both appear to be within 1,320 ft. of the "Influence Area of the interchange." If a new through lane or alley fits the description of "new roadways" or "road realignment" that would be a "Major" transportation improvement.

The proposed changes appear to meet the definition for "Major" because:

- 1. It is "larger than average" as the primary route to or from lower Willamette area to upper City area plus four freeway ramps on and off I-205.
- 2. "Serves more than neighborhood needs" as a major arterial that serves the entire City and surrounding community.
- 3. Will have traffic impacts on "more than the immediate neighborhood." High traffic volume through this corridor affects the entire south end of West Linn.
- 4. "Important to the functioning of the system." Function of this corridor affects the entire City. Multiple Community Attitude surveys have identified a high level of concern for improving 10th Street corridor.
- 5. Provides a "high level, volume or frequency of service." Rated as a level D in 2016 TSP due to high volume, poor functioning.
- 6. A facility considered to be major in a smaller or less densely developed area due to "relative significance and impact of the facility or development". This corridor might not seem significant to a big city like Chicago but two community attitude surveys for the GO bond identified a high level of importance for improving the safety and efficiency of this corridor.
- 7. The proposed changes, presented as "updates" should be vetted and added as an amendment to the TSP( Sept. 21, 2020 10<sup>th</sup> Street / Salamo update)
- 8. The changes are "significantly inconsistent" with the 2016 TSP textual description for 10th Street plan; (page 90), and Figure 15 map; " Assumed Lane Configurations and Traffic Control Devices."

#### Here is the text in the 2016 TSP:

#### "10th Street Interchange Area

The 10th Street Interchange Area consists of the segment of 10th Street located between Blankenship/Salamo Road and Willamette Falls Drive, the I-205 northbound and southbound on- and off-ramps, and three local street connections: 8th Avenue, 8th Court, and Tannler Drive. Several intersections located within the Interchange Area currently exceed their respective mobility standards during the weekday p.m. peak hour. Several more intersections currently experience significant queues that extend beyond striped storage lanes and disrupt traffic flow. Traffic volume projections included in Metro's current travel demand model indicate that these conditions are expected to continue in the future. To address the problem of the closely spaced intersections, the solutions listed below will, in part, be relied upon to improve operations rather than fully reconstructing the interchange as proposed in the 2008 TSP.

Therefore, the City and ODOT identified several improvements to address the issues, such as widening along 10th Street to provide additional travel lanes and several intersection modifications.

The following provides a summary of the improvements identified by the City and ODOT for the 10th Street Interchange Area.

Widen 10th Street between the I-205 NB Ramps and the I-205 SB Ramps to provide two through lanes in each direction. This allows for one left-turn lane and one continuous through lane in both directions between the ramps (the left-turn lanes between the ramps would be side-by-side instead of back-to-back allowing for twice the amount of queue storage)

Widening of 10th Street under the I-205 bridges may be possible without complete bridge reconstruction through the use of retaining walls or minor modifications to the bridge structures."

The initial 2018 10<sup>th</sup> Street/Salamo Conceptual Plan appears to be consistent with the 2016 TSP.

The Sept. 21, 2020 10<sup>th</sup> Street - WFD to I-205 draft plan is significantly different from the 2016 TSP.

A contract to design Willamette Falls Drive, Historic Main Street, 10<sup>th</sup> Street and Salamo, was approved in 2018, with the understanding that a public involvement process would be employed for all phases of the planning process. At some point, Mr. Calvert and the design team started to call the Willamette Falls Drive project "Phase I" and 10th Street "Phase II." (This is in red text on the <a href="Sept. 21">Sept. 21</a>, 2020 10th Street/Salamo update map.)

Avoiding a public engagement process for the  $10^{th}$  Street/I-205 concept plan would be a lost opportunity for people to learn about and provide input on the traffic calming benefits of roundabouts among other things.

West Linn currently has no roundabouts. None! Our Community Development Code does not have a definition for roundabouts. Our CDC sections on intersections and roadways are completely silent about

roundabouts. Our 2016 TSP also has no definition of roundabouts or any "future" roundabouts on the 2016 TSP maps. Roundabouts are not even mentioned in the Traffic Management section of the TSP even though they are touted as a traffic calming measure. However, the term "traffic circle" appears on page 67, Table 12: Traffic Calming Measures by Roadway Functional Classification, where it says that traffic circles are "not supported" on minor arterial or collector streets. The table does not address local streets or major arterials. Oddly enough, the traffic management section does not mention roundabouts.

In my opinion, this alone begs the need for a TSP update. Quite a lot has changed since 2016. The 10th Street/ I-205 interchange area has been in dire need of improvement since the day it was built. Several Community Attitude surveys have indicated a high level of concern for improving the safety and efficiency of the 10th Street corridor.

Most of the work has already been done. The integrity of our Master Planning Process is at stake.

Community members who care enough to participate in surveys and vote should not be deprived of the right to participate in public hearings about proposed changes to this corridor or any other significant corridor that serves our City and surrounding area, such as Hwy 43.

If you agree that the proposed changes are "major" and should be vetted and approved in a public hearings process, please move to revise Task 12 Public Involvement in the proposed 10<sup>th</sup> Street design contract to insure that Neighborhood Associations and all interested parties will have an opportunity to participate in a proper Comprehensive Plan Amendment process in keeping with Oregon Goal 1-Citizen Involvement and West Linn CDC Chapter 98.

Thank you for reading this long letter and for your dedicated service to the community, Mayor Walters, City Councilors, Chair Walvatne, Planning Commissioners, CCI Chair Knight and CCI members.

Best regards,

Teri Cummings

West Linn, Oregon