

October 18, 2016

City of Salem
Planning Department
555 Liberty St. SE
Salem, OR 97301

Re: CA16-04

I request that you submit the following information published in the "Salem Breakfast on Bikes" blog into the record for the Salem River Crossing, Land Use Action CA 16-04.

WEDNESDAY, OCTOBER 5, 2016

ODOT's Careless Approach on US20 Project Echoes in Geology Report for SRC

Maybe you will know otherwise, but I don't see any language about "earthquake" or "seismic event" in chapter 660 of the Oregon Administrative Rules that will govern the decision on the Urban Growth Boundary for the Salem River Crossing. There is Goal 7 about "Areas Subject to Natural Disasters and Hazards," but I couldn't find any corresponding rules. (Do you know where they are?)

So the fact that the SRC is proposed for unsuitable soils may not be directly relevant to the approval criteria of that Hearing. From here, for a non-specialist, it's hard to fit into the framework of the UGB decision.

Still, the *Geology Final Technical Report Addendum* is out, as are all the other addenda, and [posted to the City website](#) late last week.

It does not inspire confidence. And it seems relevant nonetheless.

ODOT's Big Project on Unstable Soil was a Disaster

The other day you might have heard about the "[Play on the Grade](#)" event to commemorate the forthcoming opening of the Highway 20 Pioneer Mountain to Eddyville project.

But that's a big happy face on an embarrassing and costly mess for ODOT.

From [the ODOT timeline](#):

In 2005, the Design Build contract was awarded to Yaquina River Constructors(YRC) (Granite Construction).

2006 winter rains caused erosion and sediment to flow into the creeks and streams. This resulted in DEQ fines of \$240,000 to the Design Builder and \$90,000 to ODOT.

2010 The Design Builder determined that columns at Eddy 'B' Bridge were out of

plumb. Further investigation determined that the columns at Cougar Creek Bridge were similarly out of plumb. Eventually the Design Builder reported that the four landslide locations were still moving; the landslide mitigation constructed in 2008—the buttresses and shear keys—had failed.

2011 No substantial construction was completed in the sections containing the four landslides and bridges since the continued movement was discovered in early 2010.

In 2012, ODOT and YRC negotiated the end of the Design Build contract and ODOT took over management of the project.

About it the *Portland Tribune* writes:

Months before the Oregon Department of Transportation asks the Legislature for a massive increase in taxes and fees to support new spending on roads and bridges, the agency plans to “celebrate” a newly completed project that went \$230 million over budget and seven years past the original due date — all to straighten a 10-mile stretch of highway....

[T]he Route 20 project has “been in some very dark spots ... certainly this project had plenty of opportunities to learn.” [says ODOT]

Those “opportunities” included replacing a contractor for allegedly poor work after paying it \$162 million, and blowing up four brand-new bridges that cost \$17.1 million, according to a four-part investigative series by Winston Ross of the Eugene Register-Guard in 2012. The series quoted documents and observers to pin the blame for the overruns on bad outsourcing as well as ODOT’s practice of awarding projects to the low bidder.

The project was built on unstable soils and land. At many decision points they failed to take this into account properly. I don't know what was the original budget, but the final cost looks to be at least 2x more, and probably closer to 3x or 4x more. It had vast overruns measured in tens, even *hundreds of millions of dollars*.

The SRC is also Proposed for Unstable Soils

The proposed route for the River Crossing is also across unstable soils and land.

The final *Geology Final Technical Report Addendum* identifies it as crossing the three worst categories of unstable soil:

- Category 5, with greater than 24 feet of estimated thickness of liquefiable material
- Category 4, with 18 - 24 feet of estimated thickness of liquefiable material
- Category 3, with 12 - 18 feet of estimated thickness of liquefiable material

But the apparent conclusion, section 5.3 "Findings," is dithery, full of weasel words, all anchored by "could." There are no "findings" here, no conclusions. It's all nebulous possibility. Note especially the uncertainty in the final sentence about the possibility of

safe construction.

- The geologic conditions and geological resources in the project vicinity could pose challenges to project construction. The preferred alternative could negatively impact the local geological resources and could potentially be impacted by geologic hazards in the project vicinity, both directly and indirectly.
- The project could contribute to impacts in the floodplain including scour, flood potential, and local slope failures. The presence of loose, soft soils, scour, streambank erosion, and earthquake-related issues (such as seismic shaking and liquefaction) could impact the project and require special construction techniques and monitoring during construction.
- The preferred alternative could lead to depletion of geological resources such as earth materials for embankment; durable rock for rip-rap; steel for reinforcing bars and structural members; stone aggregate and Portland cement for concrete; steel and copper for electrical cables and wires; and fuel oil, gasoline, and diesel fuel.
- The preferred alternative would require mitigation measures to ensure safe construction and long-term performance. *However, by conducting proper geotechnical investigations, adequate site characterization, and proper engineering design, the project structures could be constructed safely.* [italics added]

Cost Overruns are Certain, Increased by Unstable Soils

- Even if the Salem River Crossing were necessary (and of course the position here is that it is not), the likelihood of very large cost overruns is so probable that it can be reckoned a certainty.

Suppose you think the current estimate of \$430 million, which will be closer to 1\$ billion after debt service and all, is reasonable.

While ODOT and the City of Salem do a good job on small and medium-sized jobs, ODOT has a terrible track record, and in fact all agencies do, on mega projects. (See [Bent Flyvbjerg's research](#).) There is strong evidence, internal from ODOT and external from published academic studies, that the actual cost of the bridge would be double or triple the initial estimate.

So how do you feel about a bridge that costs \$2 or \$3 billion after debt service? Is it still a value to you?

The local cost on that would be on the order of \$100 or \$150 million a year.

For comparison, our 2008 "Keep Salem Moving" Road Bond was \$100 million all by itself, and that has funded about 60 different projects of varying size. Bond savings [are still being used this year](#) on a new crosswalk near WESD. \$100 million is a lot of money!

The Geology Report is Cavalier about Earthquake

There's also some funny math and probability and other balderdash in the report.

The ODOT Geotechnical Design Manual (ODOT, 2015a) defines two levels of seismic design loading for bridge design.

- The ODOT 1,000-year “no collapse” criterion requires that bridges must be designed for a level of shaking that has a 1,000-year return period under a “no collapse” criterion. “...the bridge, bridge foundation, and bridge approach fills within 100 feet of the bridge must be able to withstand the forces and displacements without collapse of any portion of the structure” (ODOT, 2015a). No requirements for serviceability or other limits on the extent of damage are defined for this earthquake.
- The ODOT 500-year “serviceable” criterion requires that bridges must remain “serviceable” for a level of shaking that has a 500-year return period. “... the bridge and bridge approach fills within 100 feet of the bridge are designed to remain in service shortly after the event” (ODOT, 2015b).

Using the location of the site (latitude of 44.95 degrees north and longitude of 123.04 degrees west), the PGA on a rock/stiff soil site (National Earthquake Hazards Reduction Program B-C Boundary) is estimated to be 0.28g (g=acceleration of gravity) for an earthquake with a 5 percent probability of being exceeded in 50 years (an approximately 1,000-year return period) and 0.19g for an earthquake with a 10 percent probability of being exceeded in 50 years (an approximately 500-year return period).

What the heck does this mean? Right now in our current geo-historical moment, we know there's a much larger chance than 5% in the next 50 years of the Cascadia Subduction Zone quake. We are due soon for the big one, not hypothetically over some distant future "return period" of 500 or 1000 years. [A year-old piece](#) described the probability of an magnitude 8.0 or greater:

The central part of Oregon is on the order of 25 to 30 percent [in the next 50 years]. That's from central Oregon southward, on the coast. Then for southern-most Oregon and in northern California it bumps up a little bit more: 37 to 40 percent. And at least to a non-specialist, the soils over which the SRC would pass are in no ways "rock/stiff."

To a non-specialist, the whole discussion in the *Geology Addendum* looks like utter nonsense. Just flat out wrong and misleading.

In a 100 year lifespan for a new bridge - that's about what we should build for, right? - the best available information is that the odds of a huge earthquake are better than a 50/50 coin flip in the next century. So anything we plan and build should assume much greater than a 5% chance of an earthquake. Anything we plan and build new from here on out should assume a 100% chance of a *huge* earthquake!

In Every Way the SRC has Unstable Foundations

The Preferred Alternative as it is discussed in the *Geology Addendum* looks to be

engineered for a mid-sized earthquake only. It doesn't look like it's reinforced to megaquake standards. *So there will likely be overruns and it will still collapse!*

And to make it actually stable to the megaquake standard would add much, much more, and multiply its already overrun cost.

Even if you think we desperately need the SRC in its present form, the current budget is not realistic and it will cost even more for the class of seismic stability we actually need.

Given those additional costs, is it still worth it?

The answer here is no.

Again, this may not fit easily into the strict framework for evaluating the proposed UGB expansion, but that seems like a fault in the process and its rules, not an irrelevancy. It is not cost-effective or reasonable to plan such a large project for soils known to be unstable in for a lifespan in which we expect a large earthquake.

THURSDAY, OCTOBER 6, 2016

Wildlife Addendum Dismisses Heron Rookery: McLane Island Needs more Study

A while back N3B observed that there was a significant Heron rookery on McLane Island and that the bridge and its construction activity would disturb it.

As with the Geology Technical Addendum, the Wildlife report is cavalier and shallow. Other agencies and organizations also echo the notion that the level of study and communication to this point is shallow and incomplete. From multiple sources and angles, not just transportation advocates, there is an accumulating body of evidence that the SRC is being rushed at this moment.

(Which is ironic since it has been going on for a decade! It is likely that elements of rushing and superficial analysis are a product of a bad project: If the SRC was such an obvious good thing, we would see more concise reports with greater clarity in conclusions and more frictionless communication, with longer lead-times, between agencies. It wouldn't all come to this last-minute rush. The lurching and clogging and uncertainty is a kind of epiphenomenon arising out of a dumb idea and poorly designed project. A sound project would be so much easier to process and there would be something closer to a positive consensus.)

Here's what the SRC has to say in the *Wildlife Technical Report Addendum**:

Impacts to birds would stem from habitat loss and from increased noise levels. Bald eagles potentially use areas within the API, but nesting bald eagles have not been observed within 1 mile of the ROW footprint since 2006 (ORBIC, 2016). Operation of the preferred alternative could disturb resting or foraging eagles and other raptors. However, raptors using this area are habituated to traffic and anthropogenic noise, and adverse effects are unlikely.

ESA-listed species, such as northern spotted owl, marbled murrelet, streaked horned lark, and yellow-billed cuckoo, are not known to occur in the API, although potentially suitable habitat exists for lark and cuckoo. Consequently, adverse effects on these species are not expected.

Other migratory birds most likely will be displaced from lost or modified habitats, or acclimate to traffic-related disturbances. *Among those likely to be displaced are great blue herons reported to nest in a rookery on McLane Island. The MBTA ensures that tree clearing will not interfere with nesting behavior.*

The new elevated bridge and viaduct structures over water and adjacent to tree canopies might cause potential bird-strike impacts. Birds typically fly in evasive trajectories during daylight hours with high visibility, but may not be able to see fencing, netting, railing, lighting, or other features of the elevated structures, or vehicles, as well during periods of low visibility and at night, particularly during migration, when their flight trajectories may be more haphazard, and collisions may be more likely (Dirksen et al., 2000). In addition, birds are known to fly at lower elevations during migration when weather is unfavorable, increasing collision risk (Richardson, 2000). Birds tend to be attracted by, and disoriented by, bright white lights, especially during migration, at night, and during poor weather or fog (Avery et al., 1976; Longcore et al., 2008). Disorientation during flight will be minimized by dark-sky lighting techniques.

Some birds may use the new transportation structures for nesting or perching sites. For example, swallows may nest in the bridge and viaduct, and birds of prey may benefit from the nesting swallows. [*italics added*]

It seems pretty clear that this was an "arm chair" investigation, conducted by desk, and that no actual wildlife survey or other field investigation for birds was conducted!

Other groups have highlighted incompleteness or shallowness.

There is no archeology Technical Addendum, and as N3B has reported, Dr. David Lewis, an anthropologist and a Grand Ronde tribal member, [testified to Council that the archeological investigation of the footprint for the Preferred Alternative has not been completed](#) and that there remains a significant chance there is a culturally and historically significant Kalapuya campsite, village, or burial grounds in the study area, particularly on McLane Island.

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

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

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

Willamette Riverkeeper says:

Willamette Riverkeeper is the key partner with the Oregon State Parks and Recreation Department in regard to the Water Trail, and no OPRD staff or our staff have heard of this proposed change until recently. In fact, it seems OPRD has not been notified of this significant proposal by the City of Salem.

Having a bridge over this island is very problematic for public use, and for wildlife. Further, bridge piers placed in the side channel around the island would also pose unnecessary risk to river users. In our view, it seems some critical communication has not occurred with the State of Oregon, or with local river organizations....

I urge you to postpone a decision until further analysis has been done that adequately reflects the requirements of the Willamette Greenway, the Oregon State Parks and Recreation Departments property at McLean Island, and further engages the public in a meaningful way.

So we have First Peoples, DLCDC, River Advocates, and wildlife interests all pointing to an inadequate analysis and insufficient communication.

By itself, the lack of detail on the Heron rookery might have been an accident or otherwise something minor and fixable. But it is clearly part of a larger pattern of skating over significant details in an attempt to jam through a bad project.

** It's hard to know how significant this might be, but the City posted versions of the different Technical Addenda to [the City website](#) on September 29th. Over the last day or so, they deleted these and posted new versions with dates of October 5th and 6th.*

I don't know what that means, but it's not a good look. I haven't found any textual differences other than a red stamp of "draft" across the cover sheet of each. But there could be other more significant changes buried in the texts. If the SRC already has a credibility problem, this doesn't help.

Addendum, October 10th

Complaining about the paper is such a dead horse (though as Hinesight reports, [a transition in Executive Editor is underway](#), and a sale on the 280 Church Street building

looks like it was recorded on August 23rd or thereabouts, so there are newsworthy developments at the paper it is not itself reporting on!), but it seems worth noting that on Sunday this great photo of the River, McLane Island, and part of the route of the Preferred Alternative appeared in the context of a breezy story on the local economy instead of writing about the proposed UGB boundary expansion. One of those story ideas is more timely than the other!

This might convey the best overall notion of the Willamette River Greenway and what is at risk in the Goal 15 Exception.

The Glenn and Gibson Creek Watershed Council has [a detailed letter in the hearing materials list](#), and it touches on some of the relevant topics. There is a lot in it, and it might be worth reading in full. Here is a summary and two excerpts:

We have six primary concerns about the proposal before you: 1) impacts to the recreational use of the Willamette River, 2) impacts to the floodplain and the failure to consider the recent changes to the federal flood management program, 3) encroachment on tributaries to the Willamette River by Marine Drive, 4) the general lack of attention to the Willamette Greenway in Salem, 5) impacts to agricultural lands, and 6) expressions of community concerns. In addition to the concerns raised in this letter I have attached separately a list of what I see as flaws in the materials presented by the staff that is relevant to your decision (Attachment A)....

The draft EIS has failed to recognize either the ownership of the island by the Oregon Parks and Recreation Department or evaluate the impacts of the proposed bridge on the use of the island as a part of the Willamette Water Trail. McLane Island Landing is the only low impact camping spot in a significant reach of the river (more than 10 miles of river). For those of us that canoe or kayak the river, the presence of a bridge over the island would significantly diminish the experience and the construction of the bridge would provide both a temporary impact to river recreation and a permanent loss of use which is not discussed in the draft EIS....

The recent promises to not impact Pioneer Village structures by the construction of Marine Drive will force the roadway into the riparian area of a small tributary to the Willamette River, likely an old channel remnant (titled Unnamed Slough in the Draft EIS). This channel has year round flow, likely from subsurface discharges and storm runoff. This is an impact that is part and parcel of the River Crossing Project. The Final EIS must evaluate the impacts of these alterations to both the floodplain function and direct losses of riparian and wetland habitats. The impacts will likely require consultation with NMFS and could affect the Final EIS and subsequent permitting. In totality, it is persuasive that there are additional regulatory processes and standards that must yet be met for the final EIS and Record of Decision.

If water issues and recreation is of particular interest to you, it might be worth reading the whole.

Addendum 2, October 12th

And late yesterday, October 11th, the City added a new memo, "[Final Section 4\(f\) Evaluation: Draft Findings for Park/Recreation Resources](#)." (The final-draft tension in these is somewhat amusing.)

In it, it says there will be another round of public comment and a subsequent decision: FHWA has made a preliminary determination that project actions will not adversely affect the features, attributes, or activities that qualify the Willamette River Water Trail for Section 4(f) protection. As such, FHWA has preliminarily determined that project actions will result in a Section 4(f) *de minimis* impact to the Willamette River Water Trail, consistent with 23 CFR Part 774.17.

The project will be publishing a public notice/opportunity for comment with regard to a finding of *de minimis* impacts to Willamette River Water Trail. Following the close of the public comment period on the published *de minimis* finding, FHWA will be requesting written concurrence from the City of Salem and Oregon Parks and Recreation Department prior to making a final *de minimis* impact determination for the Willamette River Water Trail.

FRIDAY, OCTOBER 7, 2016

SRC Energy Report: Net Increase in Energy, Petroleum Consumption

You probably heard about Kendall-Jackson/Jackson Family Wines purchase of WillaKenzie Estate. In addition to wanting to add Oregon wines to their portfolio, California firms are hedging against climate change: In a generation or two our cool-climate vineyards will be grafted over to warmer-climate grapes, and it is likely that what we think of as Napa and Sonoma will have moved north to the Willamette Valley. Big Wine recognizes this and is executing on long-term moves to keep their businesses going for generations from now.

Hurricane Matthew promises a huge storm surge in Florida, and between rising sea levels and increased energy for the hurricane's winds and rains, its impact is exacerbated by climate change.

I don't know that there needs to be a whole lot of introduction to the [Energy Technical Report Addendum](#) on the Salem River Crossing. The report is clear that the Preferred Alternative does not lessen greenhouse gas emissions by reducing congestion and idling. On the contrary, it "would provide a net increase in energy consumption."

Those who say that the SRC would reduce greenhouse gas emissions because of improved traffic flow are wrong according to the SRC's own analysis.

Any greenhouse gas reduction on SRC-related travel would come from fuel shifts in the composition of the aggregate motor fleet, not from improved free-flowing auto traffic. Because of induced demand, "the increase in traffic volume," the SRC will make things worse.

If our goal is to reduce greenhouse gas emissions, we should seek to make driving trips shorter, and to make it easy not to make driving trips at all. The SRC does not contribute to either. In this, the SRC is inconsistent with HB3543, which calls for us to reduce greenhouse gas emissions 75% below 1990 levels by 2050.

It is also inconsistent with [Statewide Planning Goal 13](#) "to conserve energy," OAR 660-015-0000(13):

Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. This may be relevant in the approval criteria for the proposed UGB expansion.

From the *Technical Addendum*, Section 4.2.1 "Impact Analysis, Direct Impacts":
[V]ehicles traveling along the routes identified in the study area would consume approximately 475,132 MBtus of energy per year by 2040. This is the equivalent of approximately 3.91 million gallons of fuel. The preferred alternative would result in a *16.1 percent increase in operational energy consumption* in 2040 compared to the No Build Alternative....

The preferred alternative is expected to have *more vehicular demand* compared to No Build Alternative because of expanded roadway capacity from the new north bridges and extension of Marine Drive to connect Riverbend Road to the north and OR 22 to the south. Despite *the increase in traffic volume*, the preferred alternative has *slightly higher speeds* (less delay) compared to the No Build Alternative. This results in higher fuel efficiency but does not offset the increase in traffic volume, so energy consumption will increase between scenarios. Also, the distance of all the segments for the preferred alternative are longer than the distances in No Build Alternative due to the extension of Marine Drive. Since the preferred alternative has more segments and more mileage than the No Build Alternative, it will result in *higher energy consumption*. [*italics added*]
From 4.2.2 "Indirect Impacts":

As shown in Table 4.2-2, the preferred alternative would use 2,271,130 MBtus of energy to construct, which is the equivalent of 20.0 million gallons of gasoline.

From 4.2.3 "Cumulative Impacts":

The preferred alternative would increase operational energy consumption by 3.9 percent in 2040 compared to the No Build Alternative, and would use the equivalent of approximately 4.8 years of operational energy consumption to construct the project.

From the Conclusion:

Project construction activities and the operation of vehicles within the study area would consume large amounts of energy resources, particularly petroleum....

Compared to the No Build Alternative, the preferred alternative would provide a net increase in energy consumption.

** Just to be clear, the 16.1% increase is total energy, not CO2 grams/mile, so the mark on the chart is not measuring the same thing; it is notional, not exact. The idea to underscore is that the SRC is not consistent with our statewide greenhouse gas goals generally. The Energy Addendum does not provide for an apples-to-apples comparison, I think. But if CO2/mile stays constant, the fact that miles traveled increases with the SRC means the total CO2 will also increase.*

Update, Noon, October 7th

They rearranged the links and added a tab system. I think they also deleted the Energy report. Something is fishy here.

- and more -

N3B has capture from yesterday or the day before, when it was posted and live.

Another update, 5pm

Ok, so this is a little tedious, but it's also possibly relevant for a note about [Goal 1, Citizen Involvement](#) - maybe for the weekend.

The report is back. But the lack of a stable set of documents, the back-n-forth deletion and posting, as well as their quantity posted on short notice certainly violates the spirit of "citizen involvement."

The captions start with "second." There was another round of documents posted 9/29, if I recall, which has since been deleted and replaced by versions from 10/5, 10/6, and 10/7.

Maybe there were others. Who knows. The process has not been transparent and it has not paid the citizenry the courtesy of reasonable lead times.

SATURDAY, OCTOBER 8, 2016

The Blizzard and the Shifting Sands: City Fails on Statewide Planning Goal 1

Between the massiveness of the document dump and the compressed time lines, the SRC team has failed to observe Statewide Planning Goal 1 on "Citizen Involvement."

The Schedule was Orchestrated

You might remember from the July SKATS-PC meeting:

Due to public and agency involvement requirements, a joint jurisdiction/agency/Interested Party public hearing will likely be scheduled in mid-October. The purpose of involving multiple participants is to ensure that all parties receive the same information along with everyone hearing public testimony at the same

time. Confusion is likely to be less if all parties are provided with the same material, information, testimony at the same time.

And from the August 23rd Cherriots work session:

Director Lincoln asked how the Board can review the Technical Reports. Ms. Warncke said the reports will be available seven days before the public hearing on the City's website for land use records.

The schedule was compressed on purpose and information was withheld from other Public Agencies in addition to the general public.

The Document Dump was a Blizzard

Part of the plan was clearly to overwhelm critics and other citizens with an impossibly large burden of reading material.

Here are [the total document lists](#) late on Friday the 7th.

That's 93 documents, many of them tens of pages, some of them hundreds of pages long.

Even on Friday, there were Shifting Sands

Throughout the period of Wednesday to Friday, there were an unknown number of additions, deletions, and modifications to the document list.

Many of the documents are historical padding, important as supporting material and context, but not directly relevant to the analysis at hand about the proposed UGB expansion.

But a key is that it is not possible for the citizenry to be able on very short notice to winnow the chaff and isolate the most relevant documents for closer analysis.

Even if you think seven days notice is adequate (and that is not the position here), by the project's own plans, there should have been a stable document list by the end of Wednesday.

The project team failed to do this.

Here are some details of the changing document lists. I didn't get a screen capture of what I think was the first set from late September, so this starts with at least the *second* iteration on 10/6 - on Thursday, after the seven-day window should have closed.

Certainly in Spirit, it Fails Citizen Involvement

On Statewide Planning [GOAL 1: CITIZEN INVOLVEMENT, OAR 660-015-0000\(1\)](#):
The citizen involvement program shall be appropriate to the scale of the planning effort.

The program shall provide for continuity of citizen participation and of information that enables citizens to identify and comprehend the issues....

4. Technical Information -- To assure that technical information is available in an understandable form. Information necessary to reach policy decisions shall be available in a simplified, understandable form. Assistance shall be provided to interpret and effectively use technical information. A copy of all technical information shall be available at a local public library or other location open to the public....

3. Adoption Process – The general public, through the local citizen involvement programs, should have the opportunity to review and recommend changes to the proposed comprehensive land-use plans prior to the public hearing process to adopt comprehensive land-use plans.

We see here a plan for an orchestrated last-minute document dump, a blizzard of documents in that dump, and a continually revised document list even after the seven-day advance window had closed.

Even professionals like staff with DLCD have noted the short time line. "This department has not had adequate time to review and include comments in this initial participation letter" of September 27th. Though it appears they did receive some documents on September 22nd, more than a week before the seven-day window for Cherrlots or the ordinary public.

At least in the ordinary sense of the words, a sense that *ordinary citizens* would recognize as reasonable, the totality of information was not conveyed in "an understandable form," the "general public...[lacked] the opportunity to review...prior to the public hearing process," and the "involvement" on the UGB Hearing has not been "appropriate to the scale of the planning effort."

The blizzard of documents is in no way "understandable" in the time frame "prior to the public hearing process." In the disjunction between the size of the document dump, its shifting nature, and the nearness of the Hearing, it is not at all "appropriate to the scale."

It violates the ordinary sense of all of these.

It might satisfy some legalistic, technical definition of these, but in the spirit of the Statewide Planning Goal it is an EPIC FAIL.

Update, October 11th

The Hearing is tomorrow, and they're still adding official reports to the document dump (not just citizen comment)!!!

Here are the Archaeology, Economics, Environmental Justice, and Social Resources addenda.

SATURDAY, OCTOBER 8, 2016

Memo on Alternate Modes Study Shows How Little has been Done

One of the blizzard of documents the City and SRC project team posted to [the City's UGB Hearing website](#) is interesting for a couple of reasons.

First off, the "[Salem River Crossing Alternate Modes Study Implementation Overview](#)" is addressed to the "Salem River Crossing Project File." It didn't go to City Council or SKATS or any other public body. It was never posted to the SRC's own website as part of the Oversight Team's materials. Instead it was private and internal, and it points to the existence of a trove of non-public memos and analyses. It would be interesting to see what else has not been made public.

Second, the memo is disproportionately lengthy relative to the actual scope of accomplishments. It says "The purpose of this memo is to document actions identified in this study [[the Salem River Crossing Alternate Modes Study](#)] that have occurred or otherwise advanced towards implementation in the last five years."

This will be tedious, but we'll go through all of the "actions" and assess them. The pattern that emerges is a consistent ratcheting up of small things in an attempt to make them seem like big things. There is a scattershot pattern of fragmentary actions. Individually they are real things, but together they remain too small, too disconnected, and too partial to make for effective change. They are window dressing more than substance. Until they participate in fully connected networks, they remain weak measures, sometimes more for show than substance.

Some sections of the memo also discuss measures not called for in the Alternate Modes Study. So while it may be true that the City did something with this measure or that, they do not fulfill or complete recommendations in the Alternate Modes Study itself, and to cite them as such is to lard the memo with extras or a bit of a bait-and-switch.

Finally some paragraphs repeat material and might give the impression of more action than is warranted.

(Throughout, memo language will be in *italics* and mostly indented. Commentary will be in roman type and non-intended. Hopefully this will be clear. For convenience we'll also abbreviate as the "Alt Modes Study" from time to time.)

Transportation System Management (TSM)

The TSM recommendations are divided into two groups: (1) Bicycle and Pedestrian Recommendations, and (2) Transit Recommendations.

Bicycle and Pedestrian TSM Recommendations

The bicycle and pedestrian TSM recommendations include creating new and enhancing existing bicycle and pedestrian facilities leading to and crossing the

Willamette River. The City has implemented a number of improvements over the past few years that align with these recommendations. In addition, there are a number of projects with approved funding slated to be completed within the next 5 years. Following is a summary of these enhanced bicycle and pedestrian improvements. Shared Lane Markings: The City installed shared lane markings on select streets in west Salem and downtown Salem, including Rosemont Avenue NW, Musgrave Lane NW, Wallace Marine Park, Commercial Street NE/SE (through downtown), and Chemeketa Street NE (through downtown).

In way this is the perfect thing to lead with in the memo. Striping a few sharrows around town in disconnected segments is not sufficient to do very much, and the City has not extended a network of sharrows in new places. Moreover, the sharrows on Commercial and on Chemeketa aren't actually on low-traffic streets and represent something of an "off-label" use for sharrows. Finally, the limitations of sharrows have become apparent, and they are recommended less and less. In the photo from the paper, you can see a "bike salmon" on Chemeketa Street at Winter: He is biking against traffic, and hugging the curb. For him, the sharrow is not at all useful. You may say that this is a compliance issue, as the man is in fact bicycling illegally, but it is also true that this is not isolated, and many people find too much traffic, too high speeds, and too many parked cars of Chemeketa for their comfort, and do not feel confident biking down the middle of the chevrons.

- *Striped Bike Lanes: Bike lanes and sidewalks were added to Eola Drive NW. This arterial street provides a connection from the southwestern area of west Salem to Edgewater Street NW, and from there to the existing bridges. In downtown Salem, the Urban Renewal Agency has programmed \$600,000 in the City's Capital Improvement Plan, fiscal year 2015 - 2016, to stripe bike lanes through downtown on High Street (southbound) and Church Street (northbound). Striping these streets with bike lanes will help expand the bicycle facility network to support increased bicycle trips across the Willamette River.*

The memo talks about "enhancing" existing facilities. There is nothing enhanced about a basic bike lane on arterial and collector streets. In most cases, these are baseline and part of standard street design. High and Church Streets also run north-south and do not directly contribute to making the east-west connection across the Willamette River. From High or Church Street for many it remains a perilous and unrealistic trip to reach the Union Street Railroad Bridge for a crossing of the River.

Also, see below for the list of Streets in the Alternate Modes Study itself. This bullet doesn't correspond at all to what the Alt Modes study actually recommends. It is therefore largely padding.

- *Develop Bike Boulevards: In 2012, the City of Salem adopted a network of proposed "Family-Friendly Bikeway" into the Salem Transportation System Plan (TSP). For the purposes of the Salem TSP, the term Family-Friendly Bikeway is synonymous with Bike Boulevard. Since this time, the City has undertaken initial steps to enhance these lower-stress bikeways, with an emphasis on routes*

that connect to downtown. Bike destination signs were added to key routes, including Chemeketa Street NE, Winter Street NE/Maple Avenue NE, and the Union Street Pedestrian and Bicycle Bridge. The City has recently seen a growth in the public support for developing bike boulevards. Given the heightened interest, in June 2015, the City applied for a Transportation and Growth Management Grant to develop a concept plan for the City's first full-fledged bike boulevard. The proposed route connects the City of Keizer and ODOT's Shared Use Path along Salem Parkway to the Capitol Mall and downtown. This is an important route to connect people to the Willamette River by way of connecting bikeways on Union and Chemeketa Streets NE.

This is mostly true! Except that it really should be singular, not plural. (See below for full list of streets recommended in the Alt Modes Study.) We are working on a plan one bike boulevard only. Union Street maybe counts as a half of an additional one, as there is a mostly funded plan only to Winter Street at this moment. The Maple-Winter Street alignment in progress, it must be said, does not figure in the Alt Modes Study as part of its recommendations. It is an important route, that much is true, but it's not actually one of the Alt Modes recommendations to implement.

- *Union Street Pedestrian and Bicycle Bridge – Connections:*

- *Signs connecting users to the Union Street Bridge have been added in west Salem and downtown. The bike destination signs were installed as a joint effort between the City and ODOT. In addition, pedestrian way-finding signs were installed by the Urban Renewal Agency to enhance the connections between the Edgewater District, Wallace Marine Park, the Union Street Bridge, downtown Salem, Willamette University, Bush Park, and more.*
- *The intersection of Wallace Road NW (a state highway) at Glen Creek Road NW was widened in 2014. While this widening resulted in longer crossing distances for pedestrians and bicycles, the design included features to accommodate pedestrians and bicycles. In particular, the pedestrian crossing of the south leg of the intersection, which had previously been closed, is now open. Green paint was applied at locations where right turn lanes cross over bike lanes.*
- *A new shared use path was constructed in 2014 as a connection between the Union Street Bridge and Glen Creek Road. This path provides a more direct and safer route to and from the Union Street Bridge from areas north and west of Glen Creek Road.*
- *The west end of the path to the Union Street Bridge currently ends at Wallace Road NW with no crossing opportunity. The Urban Renewal Agency is finalizing a planning effort to address various needs within the west Salem business district, including transportation connectivity. While not yet adopted, one of the final recommendations from this study is to provide a grade-separated crossing of Wallace Road in line with the current pathway to the Union Street Bridge. This undercrossing would serve all modes, but would be designed to facilitate east/west bicycle and*

pedestrian travel.

- *Plans to improve connections on the east side were refined in the 2013 Central Salem Mobility Study. The first phase will be installation of a traffic signal on Commercial at Union Street. This project is funded and in design. The second phase will extend improvements east on Union Street to connect to the Winter Street bikeway. The Urban Renewal Agency has programmed \$1.5 million in the City's Capital Improvement Plan, fiscal year 2017 - 2018 and 2018 - 2019, to advance this phase of the project.*

This is also mostly true, but its interpretation is very much in the half-full mode: The interchange of Wallace & Glen Creek was *hugified*, not just "widened." Sure there is green paint, but the design isn't one you'd send many kids to the park on. It is not family friendly or comfortable for casual cyclists.

The signage is useful - but only if you are already comfortable on these roads. It might assist on wayfinding for the first trip, but if the roads are not comfortable, a person will not make a second trip and will bail out of the project to make more bike trips on the route.

The path between Glen Creek and the Union Street Railroad Bridge is nice and all, but it's a shortcut only, not a key connection. Mostly we resist calling bike facilities "amenities," but this one fits: It's a non-essential enhancement, not a fix to an important gap.

The final two paragraphs on the Second Street/Wallace undercrossing concept and the Union Street bikeway are padding. The undercrossing remains conceptual and is still being studied. Currently as part of a \$30million+ concept with Marine Drive, it is quite a ways off. The Union Street bikeway graph is totally superfluous and duplicates material above on the "bike boulevard" bullet and below on the "safe crossings" bullet.

- *Shared-Use Paths: In addition to the new shared-use path connecting the Union Street Bridge to Glen Creek Road NW, construction is underway on a new pedestrian and bicycle bridge connecting downtown and Riverfront Park to Minto Island Park. When construction of this bridge and connecting pathway is complete, there will be over 20 miles of connecting shared - use pathways, including the network in west Salem. While this project does not directly address peak hour trips between west Salem and downtown, the creation of this shared - use path network will provide an opportunity for newer bicyclists to experience and become comfortable with the Union Street Bridge. This in turn can translate to increased use for commute trips.*

"This project does not directly address peak hour trips between west Salem and downtown." It also trades on a narrative of increasing skill that evidence does not necessarily support. We do not in fact see a great translation from riding in parks to riding downtown on city streets. It's not like large numbers of people bike around the park and then feel emboldened to contend with city traffic after they pick skills. This also accepts the idea that bicycling should be a specialized skill that only confident

people should employ. It makes vehicular cycling normative and says to people who want to bike "you will adapt!"

- *Bicycle Parking and Repair Station* : The City increased the number of bike racks located within the downtown business district in 2012. The availability of convenient bike parking can make it easier for people to choose to bike downtown. In 2014, the City installed its first bike repair station in Riverfront Park. This facility is available to support both commuter and recreational bicyclists.

Yeah, but again, without comfortable streets by which to reach these bike racks and repair stations, they are underutilized. It's a bit of a Potemkin display to "make it easier for people to choose to bike downtown" until we have comfortable streets for people. The Alt Modes Study also specifically calls out bike corrals for downtown, not merely a few more racks to downtown sidewalks.

- *Safe Crossings: The Alternate Modes Study identified three specific locations for enhanced bicycle/pedestrian crossing.*
 - *Union Street NE at Commercial Street NE: This project is funded and in design with construction scheduled for 2017. The design is based on refinement planning that was completed in 2013, and includes installation of a new traffic signal to facilitate bicycle and pedestrian crossing of this state highway.*
 - *Junction of Wallace Road NW and the Union Street Bridge bicycle and pedestrian path: Refinement planning for this need is currently underway through the West Salem Business District. Preliminary recommendation is for a grade - separated crossing. Funding will still need to be identified.*
 - *Wallace Road NW at Glen Creek Road NW: This project was constructed in 2014. See description above under Union Street Pedestrian and Bicycle Bridge, West Salem Connections.*
 - *In addition to these intersections, the 2013 Central Salem Mobility Study identified ten downtown/Capitol Mall area intersections where double turn lanes can be reduced to single turn lanes, thereby reducing potential pedestrian conflicts. The City plans to pursue these relatively low - cost modifications over the next few years.*

The signal for Union at Commercial will be a major accomplishment, but this is the third time the Union Street bikeway appears in the memo. The Second Street/Wallace undercrossing has already been mentioned. Wallace Road at Glen Creek has already been mentioned. So three of these bullets are padding. The fourth is new, and is meaningful - but they mostly benefit people on foot (and a few vehicular cyclists who are confident taking the lane downtown) and don't do much to "address peak hour trips between west Salem and downtown."

- *Wayfinding Signage: The City added 9 miles of bicycle destination signs in 2012,*

including signs connecting users to the Union Street Bridge on both sides of the Willamette River. Pedestrian way - finding signs were added throughout downtown and in west Salem.

We already *discussed* signage under the Union Street Railroad Bridge. This is largely padding.

- *Sidewalk Infill: The focus of this project is infill of sidewalk along feeder streets in west Salem, including Glen Creek Road NW and Orchard Heights Road NW. While there has not been progress on either Glen Creek or Orchard Heights Roads, there has been sidewalk infill on other west Salem feeder streets, including Eola Drive NW (minor arterial), 9th Street NW (local), and Gerth Avenue NW (local).*

"There has not been progress on either Glen Creek or Orchard Heights Roads." Since those are the main sites recommended in the Alt Modes Study, his seems rather partial, and again gaps in a network tend to render the whole network minimally useful. People give up at gaps.

So how'd we do? The memo has nothing at all on:

- Salem Parkway Shared-use Path (which is not surprising because it's tied to the SRC itself - so this really doesn't count)
- Maintain Bike Lanes/Trails
- West Salem Bike routes
- Bicycle/Transit Integration
- Trip-End Facilities

Maintenance and trip-end facilities are important! And the West Salem Bike Routes would be a great help. There are some real omissions here.

Recommendations not yet complete:

- Shared Roadway Markings - also recommended for Liberty Street in downtown.
- Stripe New Bike Lanes - The paragraph above about Eola/Edgewater is actually completely disconnected from the actual recommendations from the Alt Modes Study, which calls for bike lanes on: Broadway St NE (Liberty to Parkway), Center Street (Commercial to 17th), Market St (Commercial to Capitol), Marion Street (Commercial to 13th).
- Develop New Bicycle Boulevards - The Alt Modes study calls for full bike boulevard treatments (not just sharrows or signs) on: 6th Street NW, Patterson St NW, Chemeketa St (Commercial to 24th), 4th St NE (Market to Tryon), as well as Union Street.
- Union Street Bridge/Edgewater Connction - While the over/undercrossing concept is in progress, *one key element of this recommendation has been totally abandoned.* There will be no "rail/trail west of new crossing extending to Patterson Street NW."

- Shared-use paths - Two key components in the study are omitted: Marine Drive alignment, Pringle Creek path to Riverfront Park (the Boise/South Block segment).
- Bicycle Parking - In addition to calling for bike corrals downtown, the Study also calls for revising bike parking requirements in our code and developing a program with employers for improved on-site bike parking.
- Sidewalk infill - The primary streets identified in the Alt Modes Study are exactly the ones that didn't get any.

Here, in many cases the most important parts of the recommendations are not yet in motion, and it is only secondary or unrelated recommendations that are discussed and in motion.

That's the first third of the study, on Bicycle and Pedestrian Recommendations.

There is a section on Transit, but others who follow transit more closely will be able to assess it better. We omit it here. [A second post will discuss TSM/TDM recommendations.](#)

Already, though, in the Bike/Ped section, it has not been implemented very quickly or deeply. I rate most of the progress as on marginal (and generally easy) things rather than on core and more structural recommendations, which are more difficult, more costly, and will in some cases require a stand against our autoism. Some locations for bike lanes may require less curbside car parking, for example.

Assessing the Alt Modes Study accurately is important because the SRC keeps saying over and over "the traffic modeling performed for the Salem River Crossing Project assumed that more aggressive transit and TSM/TDM programs would be implemented." (From the *Land Use Addenda*.) What has happened though is the speech and intent keeps getting substituted for action, and we act as if what we say we will do we have in fact already done.

The Alternate Modes Study recommendations for bike/ped has in no way been implemented "aggressively" and we should want to see this done before we move forward with anything for the Bridge.

SUNDAY, OCTOBER 9, 2016

Memo on Alternate Modes Study, Pt 2 - TDM Badly Underfunded

For the full introduction and part 1, [see here](#).

Moving over to the "Transportation Demand Management" side of the Alternate Modes Study, the overwhelming impression is a set of projects marginalized and underfunded. Most of the programming is solidly "alternate," secondary in most every way, and rarely represents a serious attempt to accomplish something substantial. It's fiddling on the edges in a way that is mostly for show; institutionally as expressed in budgets and FTE there is not enough care whether something actually succeeds. Programming is not

actually being positioned for success.

Transportation Demand Management (TDM)

The TDM recommendations are divided into two broad groups, TDM Implementation Strategies and TDM Concepts. The TDM Concepts are further divided into five categories, with some overlap: (1) Multi-Modal Concepts, (2) Bicycle/Pedestrian Specific Concepts, (3) Transit Specific Concepts, (4) Parking Specific Concepts, and (5) Carpool/Vanpool Specific Concepts. Cherriots Rideshare serves as the lead organization for TDM in the Salem area.

TDM Implementation Strategies

There has been some progress on advancing three of the four implementation strategies identified in the Alternate Modes Study.

- *Bicycle and Pedestrian Coordinator: The City added an additional transportation planner position in 2011, thereby doubling the staff devoted to transportation planning. Both transportation planners cover all aspects of transportation planning. The new transportation planner has taken the lead on managing bike parking and implementing bicycle destination signing, among other responsibilities.*

"Both transportation planners cover all aspects of transportation planning." This is not a dedicated Bicycle and Pedestrian Coordinator yet. The FTE added in 2011 is nice and all, but there is not a dedicated advocate inside the City for walking and biking. We try not to get personal here, but it should be noted that one of the City's planners who "covers all aspects" is the City's lead on the SRC and the author of this memo. A charitable construction on that is there are divided loyalties, and walking and biking consequently suffer. "When everyone is in charge no one in charge" etc. This is an institutional and organizational problem, a City problem with job descriptions and funded priorities, and not any personal failure, of course.

Transit Funding: As discussed earlier in this memo, transit district funding continues to be limited. However, the Transit District has proactively worked to improve the effectiveness of their service and this is reflected in the coming changes identified in the Moving Forward plan. In addition, the Transit District has laid the groundwork for expanding service to evenings and weekends when funding allows. This work provides a strong foundation for future funding opportunities.

For last November's ballot measure, the Chamber of Commerce mounted a massive anti-transit campaign and Salem Hospital took \$50,000 they received from Cherriots and turned around and donated \$50,000 to the anti-transit campaign.

- *Individualized Marketing Program: This recommendation is for an individualized marketing program for trips between west Salem and downtown. While this has not been implemented, Cherriots is currently in progress with a similar*

marketing program for two other neighborhoods in Salem (NEN and Grant). The results of this program may create momentum to launch a program for west Salem.

"An individualized marketing program for trips between west Salem and downtown...has not been implemented." With 583 residents participating in [the NEN/Grant program](#), the pilot yielded a reduction of a little more than 7% in drive alone trips: 2.5% trips shifted to bicycling, 1.9% to walking, 1.5% to transit, and 1.3% to carpooling.

TDM Implementation Concepts

One-Stop Website for Alternate Modes: Cherriots Rideshare is finalizing a Strategic Action Plan (Summer 2015). One of the key short-term recommendations (Year 1) is to build a new website. The new website would be designed to improve program efficiencies by increasing awareness, reaching a broader geographic audience, providing electronic resources, and promoting social media tools.

There has been talk of the new website, but it has not been publicly released. The website is [currently in an awkward transition phase](#).

- *Acknowledge and Reward Commuters: Cherriots Rideshare offers various reward programs, often in conjunction with other rideshare entities in the Willamette Valley. For example, Cherriots Rideshare was a sponsor of Carpool Karma, a carpool challenge in western Oregon that ran between February 1 and May 1, 2015.*

It seems telling that there are no numbers here. In [the Rideshare Strategic Report](#) for 2015 (written *after* the date of this memo, it should be noted), it says there were 571 participants - in seven counties! Cherriots concluded "While this campaign raised awareness of the DLC tool and the advantages of carpooling, the resources used seem disproportionate to the result. For that reason, it is not likely the partners will engage in this type of campaign again, unless advances and improvements are made in Drive Less Connect or a new tool is implemented."

- *Education on Bike/Transit Integration: Cherriots has information online with instructions on how to load your bike on the bus, including a brief video tutorial. In addition, they periodically bring demonstration racks to public events for people to practice putting a bike on the bus rack.*

But is this specifically targeted to West Sailemites as a way to avoid drive-alone trips across the river? See note on individual marketing above.

- *Employer Bicycle/Pedestrian Programs and Facilities: Cherriots Rideshare supports employer bicycle/pedestrian programs through its network of Employee Transportation Coordinators.*

This is pretty vague. The ETC programming has not seemed very robust.

Bicycle Encouragement: In 2013, The City of Salem launched Salem Sunday Streets. This annual event promotes healthy and active living by opening up city streets for people to play, explore, and build community.

Salem Sunday Streets went on hiatus in 2016 and there seems to be little real enthusiasm for it at the City. Eugene is the same size as Salem, and they have three City of Eugene staffers working on the project. Salem seems to think it can be a mainly volunteer effort, but it seems clear that the lead must be provided by City Staff. This seems clear operationally - but also as a matter of priorities and values. The City should be saying "this is important to us." Budgets are where we see values.

- *Bicycling and Walking Information Distribution: In 2012, the Salem area bike map was updated through a partnership with the Mid-Willamette Valley Council of Governments, Cherriots Rideshare, and the City. This was the first update since 2006. The bike map covers the Salem-Keizer metropolitan area as well as the surrounding three-county region (Marion, Polk, and Yamhill counties). This map is distributed free of charge at area bike shops, traveler information centers, and at events. It is also available online. An updated version is scheduled for 2016. In 2015, Cherriots Rideshare worked with a group of students from Willamette University to create a walking map of downtown Salem. Cherriots Rideshare will be printing the map and making it available free of charge.*

While [the walking map was not very good](#), the [bike map continues to be a bright spot](#) and solid accomplishment.

- *Parking changes: The last five years have seen significant review of the City's parking management policies. This review has led to several increases in parking rates. Parking meter rates were doubled in 2013 (from \$0.75/hour to \$1.50/hour). Parking permit rates in City-owned parking garages increased based on demand, with the highest increase being 44 percent at Liberty Parkade between 2010 and 2015. Parking fines have similarly increased, with increases ranging from 25 to 300 percent.*

Right-priced parking is one of the most important actions the City (and employers!) can make, and it continues to be contested by folks who want subsidized, free parking. So far, downtown remains committed to free on-street parking. The "review" is working on the margins, but has had to leave untouched key centers and structural changes.

- *Drive Less Connect: Cherriots Rideshare participates in Drive Less Connect, Oregon's secure, easy-to-use online ride-matching tool that matches users with rides. In addition to providing online ride matching for carpools and vanpools, it can also help users find a biking partner. The number of users in the Drive Less Connect system has increased substantially in recent years, from 948 users in 2011-12 to 3674 users in 2014-15.*

It has seemed that the three county area of Yamhill-Polk-Marion, the Drive Less Connect program attracts about 1000 new users each year. That seems like a rounding error. About the software, [Cherriots says](#): "Staff will continue to promote and utilize the tool; however, its limitations such as lack of reporting features, inability to manage team challenges and cumbersome user experience are impediments to its usefulness."

- *Emergency Ride Home Program: Many area employers are registered participants of the Cherriots Rideshare Emergency Ride Home program. This program provides users of alternate modes with a ride home in the event of an emergency.*

This program has 320 registered users. Again, a rounding error.

So how'd we do?

The SRC memo has nothing directly on:

- Develop a Transportation Management Association
- Incentive/Challenge Programs to Encourage Bicycling and Walking
- Conduct Targeted Marketing Recruitment
- Reduce the Direct Cost of Transit Passes to Employees and Commuters
- Switch from Monthly to Daily Fee Parking
- Discourage Parking at Peak Periods
- Price Parking to Recover the Costs
- Apply a Tax to Parking Spaces
- Provide Parking Cash-Outs to Employees using Alternate Modes

Something that is interesting, and probably significant, is that the memo's bullet points on biking and walking closely followed the headers in the table of contents of the Alt Modes Study. Here on the TDM side, the memo's bullets do not follow the headers as closely, and it looks like a rhetorical move to evade the facts of very little progress. If the memo followed the headers more closely, especially using their level of detail, there would be many more blanks or sentences of "no progress." The disjunction in level of detail is clearest on Parking issues, I think.

The overwhelming impression from this list is that "we haven't tried very hard yet." The programming we have done is very limited and it is nearly certain that we haven't applied enough financial and staff resources on projects to position them for success. It should not surprise us that our desultory institutional efforts have yielded limited success. Since we haven't tried very hard, we also cannot draw conclusions about any failures.

(It must be said that most of the funding for Cherriots RideShare/Trip Choice comes through SKATS from Federal sources - STP-U and TAP-U, [see chart in this discussion](#) - and that at least theoretically, SKATS could shift spending from autoist road widening projects to TDM projects. This is funding separate from Cherriots' bus operations. And, again, the level of funding represents a statement of our commitments and values.)

In the end, we have taken baby steps only on implementing the Alternate Modes Study. In order to achieve the 8% reduction the SRC traffic modeling assumes, we will have to make "aggressive" steps, not just baby steps. It is possible that we discover those steps are more effective than we supposed - again, we need to try hard - and confirm that spending \$5 million or \$50 million on walking, biking, and busing is way more effective than \$500 million on a new bridge and highway.

FRIDAY, OCTOBER 14, 2016

Short DLCD Comments Argue for Incompleteness in SRC Case

I found the second set of comments from DLCD a little disappointing. I was expecting a longer, more detailed critique, a fisking really. But instead of addressing errors, they mostly keyed in on a set of lacunae. It was structured around a notional remand more than anything else.

From the letter (***bold italics*** are in original, *regular italics* are added):

Goal 12 and Transportation Planning Rules

Goal 12 and the Transportation Planning Rules (OAR chapter 660, division 12) apply to the Salem TSP and UGB amendments, so the comments below apply to both of these actions.

Transportation Need

The findings for transportation need address some of the elements of Oregon Administrative Rules (OAR) 660-012-0030, but the findings are missing some key references.

OAR 660-012-0030(1) requires that the "TSP shall identify transportation needs ... including: (a) State, regional, and local transportation needs." OAR 660-012-0015(3) requires that local TSPs must be "consistent with regional TSPs and adopted elements of the state TSP." The findings (Section 3.1.3.1, page 80) note that *the Oregon Highway Plan (OHP) does not identify a need for an improved Willamette River crossing in Salem*. The findings include projections of future traffic volumes that would exceed the mobility targets adopted in the Policy 1F of the OHP. In response, the findings say that the "The State proposes to adopt Alternative Mobility Targets." This implies that consistency with the state plan will be achieved by amending the standards within the OHP, rather than by adding a project to the state plans.

The findings in this section do not include *OHP Policy 1G, which calls for improving the efficiency of, or adding capacity to, the existing highway system before adding new facilities*. The findings include a cross-reference stating that "consistency with statewide transportation plans is provided in Section 4.2.4." State transportation plans are actually addressed in Section 4.2.5 (page 168). OHP Policy 1G is included in Section 4.2.5.2 (page 172); however, this section does not contain any findings, and points back to "Section 3.X ." *With this circular cross-reference, the findings do not address Policy 1G....*

OAR 660-012-0030(4) provides, “In MPO areas, calculation of local and regional transportation needs shall also be based upon accomplishment of the requirement in OAR 660-012-0035(4) to reduce reliance on the automobile.” OAR 660-012-0035 requires that “local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reduce reliance on the automobile.” The findings (Section 3.1.3.1, pages 84- 85) describe existing spending on various projects at the MPO level to make the general point that funding is being provided for projects that could increase transportation choices. *The findings do not analyze whether the need that has been identified for this project is based on the locally adopted standards.*

Selection of Transportation Alternatives (OAR 660-012-0035)

The findings address some sections of OAR 660-012-0035; however, *key information is missing for some sections, and there are applicable sections of the rule that the findings do not address at all.*

The findings for OAR 660-012-0035(4) are incomplete, and *miss the actual requirement of the rule.* The rule requires provides, “local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reduce reliance on the automobile.” The findings (Section 4.1.2.5, page 149) generally address whether the TSP amendment would “increase transportation choices and reduce reliance on the automobile,” but do not specifically address the locally adopted standards that must be used to measure progress. The findings list some general ways in which the proposed amendments might have the effect of increasing transportation choices as a secondary or indirect effect, but *do not include any findings that the proposal was “designed” to achieve this outcome.*

The findings do not address OAR 660-012-0035(7) , which states:

... 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.

Local governments in the region have not evaluated progress in meeting the adopted benchmarks. The findings do not include any analysis as to whether the TSP amendment would be adequate to meet the benchmarks.

Significant Effect on the Transportation System (OAR 660-012-0060)

There are no findings for OAR 660-012-0060. While findings for the proposed UGB amendment need not address 660-012-0060, findings are required for the proposed TSP amendments (changes to functional classifications), and for comprehensive plan map designation changes within the existing UGB (see OAR 660 -024 -0020(1)(d)) .

Reasonably Accommodating Needs within the UGB

The findings (Section 3.1.4.1, pages 86- 104) address whether the projected transportation needs could be reasonably accommodated on land already inside the UGB as required by OAR 660-024-0050(4) . The findings include a brief discussion of

alternatives studied other than the preferred alternative, a no -build alternative, and “Alternative 2A.” There is a detailed discussion of Alternative 2A. However *evaluating a single alternative within the UGB may not be sufficient to “demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB”* as required by OAR 660- 024- 0050(4). The findings should analyze whether the aspect that makes an alternative unreasonable is inherent to being within the UGB (and thus any alternative within the UGB would also be unreasonable) or whether the unreasonable aspect is specific to that alternative (and thus different alternatives within the UGB could be reasonable)

The department has previously provided advice on how to analyze the reasonableness of alternatives. The first step is to identify the factors that will be evaluated (for example: cost, traffic, congestion, residential dislocation). The second step is to select and justify thresholds (for example: 25 percent worse than the preferred alternative) that will determine whether an alternative is reasonable. The final step is to analyze a broad range of alternatives to determine whether any reasonable alternatives would accommodate the need within the UGB. *The findings provide a large volume of information comparing two alternatives, but do not include a structured analysis of why they are reasonable or unreasonable.*

The department understands that the draft environmental impact statement included additional alternatives that did not require a UGB amendment. The findings should make reference to these other alternatives and address why the alternatives are unreasonable.....

Conclusion

The draft proposal submitted is missing some important findings, and does not adequately address the required goals and administrative rules as summarized above. The draft also includes numerous incomplete cross-references (e.g. “as described in Section X”) which makes it difficult to find the information, or determine whether the information has been provided at all. We recommend the city address the concerns raised in this letter so that it can have a solid, defensible factual basis for this UGB expansion.

Maybe the most interesting thing is the rhetoric of "recommending" not "requiring." Because the proposal is to add less than 50 acres to the UGB, the DLCDC has only a kind of advisory role, and is not an adjudicator. So it seems like the SRC team could just pretty much blow off the recommendations and see if in any appeal process LUBA makes the recommendations mandatory. Maybe it's more complicated than that - but relevant question here is more "who has the power" and is less the technical question of "what is the best analysis."

Specificity and ORS 197.763(1)

News from last night's Public Hearing is that the record will be kept open at least through Wednesday the 19th, ending at 5pm.

That's incrementally helpful, I suppose, but it doesn't really address the problems with Statewide Planning Goal 1 on "Citizen Involvement." In the face of the blizzard, it's something of an empty courtesy. It's not very generous, not oriented towards finding the truth or findings based on best available information.

One of the especially forbidding aspects of the blizzard created by the document dump is captured by part of the LUBA decision, [SCAN v. City of Salem and Salem Hospital](#).

From the decision:

petitioners have not demonstrated that the issue of whether SRC 77.150 requires bike lanes on Mission Street was raised below with the specificity required by ORS 197.763(1). This issue is waived.

As cited in the decision, ORS 197.763(1) says:

An issue which may be the basis for an appeal to [LUBA] shall be raised not later than the close of the record at or following the final evidentiary hearing on the proposal before the local government. Such issues shall be raised and accompanied by statements or evidence sufficient to afford the governing body, planning commission, hearings body or hearings officer, and the parties an adequate opportunity to respond to each issue.

Somewhat later in the decision, LUBA says:

Absent a more developed argument based on the requirements of SRC 220.005(f)(3)(B), petitioners' arguments under these assignments of error do not provide a basis for reversal or remand.

It is not necessary to review the specifics of any of those arguments on the Blind School, which had been drafted with great care. Even so, LUBA wanted more. What appears meaningful is the expectation of even greater sophistication and development in the arguments contesting a land use decision, a complexity it may be impossible for citizens to develop in just a few days before and after a Public Hearing.

The DLCD letter is something of an appeal to this requirement for specificity - but who will enforce it? How do we get there?

It'll be interesting to see how this plays out. (Do you know of some factor that makes for a more optimistic reading of all this?)

SATURDAY, OCTOBER 15, 2016

The Mostly-Ignored High Level Consensus to Reduce Drive-alone Trips

In the Oregon Highway Plan, the Salem Area Comprehensive Plan, and the Administrative Rules implementing the Statewide Planning Goals, there is a broad consensus that we should decrease reliance on drive-alone trips and we should improve efficiency before building new capacity. The consensus is clear, it's in plain English, and

it is easy to understand.

Yet we do not have practical norms, cultural and political, built around these policies. We flout them routinely as if they did not exist. If we deign to pay them lip service, we offer excuses about why they are not realistic yet and we cannot actually implement them. It shouldn't be this difficult, but it is.

In the Staff Reports and supporting analyses, there are thousands of pages written, thousands of people-hours laboring at the keyboard, all to evade or deny the truths of these policies. The analytical apparatus is designed not to resolve the contradictions but to hide them.

Our autoism creates and reinforces a real blind spot. The SRC is a prime expression of this.

The Consensus: Three High Level Policies for Reducing Drive-Along Trips

Oregon Highway Plan Policy 1G

Comprehensive Plan (IV)(J) Policies 11-18

OAR 660-12-0035(4):

In MPO areas, regional and local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reducing reliance on the automobile. Adopted standards are intended as means of measuring progress of metropolitan areas towards developing and implementing transportation systems and land use plans that increase transportation choices and *reduce reliance on the automobile*. It is anticipated that metropolitan areas will accomplish reduced reliance by changing land use patterns and transportation systems so that walking, cycling, and use of transit are highly convenient and so that, on balance, people need to and are likely to drive less than they do today. [italics added]

The SRC Does not Comply

But the Salem River Crossing doesn't promote reduced reliance. According to the projects own traffic modeling, "[Vehicle Miles Traveled] increases with the preferred alternative...." As [we saw with the Energy Addendum](#), it is forecasted to increase energy use by 16%. Everything about it is movement *away from* our officially adopted and ostensibly binding policy goals on greenhouse gases, energy, and reliance on drive-alone auto trips.

The current SRC analysis attempts to finesse the argument with an assumption of an 8% reduction. It effectively says "we are helpless to do more, but because we need the bridge, we will assume an 8% reduction."*

But the Highway Plan, Comprehensive Plan, and Statewide Planning Goal each don't say

"cities should theorize about ways they could potentially reduce drive-alone trips and then go ahead and build big projects anyway."

Salem's policy 12 is probably clearest: other measures shall be the "first choice for accommodating travel demand and relieving congestion...before widening projects are constructed."

We have to do stuff and fail first before we can resort to constructing widening projects. They have to actually not work. *Empirically*. Not just theoretically.

Two Effective but Unpopular Measures

And in fact at least two approaches discussed by the project team look very promising, and offer more than an 8% reduction - *all by themselves!*

First there is parking. "[I]ncreasing the area where parking charges are applied in the downtown area and tripling the amount charged could reduce auto trips by 10%."

The November 12th, 2014 memo "Salem River Crossing - Revenue Projections" was never published formally, but its draft contained a table with traffic projections based on tolling.

The tolling reduced traffic very effectively, by *multiples* of 10%!

The Political and Cultural Problem

It is simply not true that we can't reduce the traffic demand by more than 8% without building a new bridge and highway.

But the two elements that have the most effect involve market pricing and better allocating demand by eliminating subsidy and price supports for autoism.

These are not popular positions right now! Our autoism is based on in no small way on making sure that there is not a robust and fair system of user fees that properly correlate use, supply, and demand. So disturbing free parking and free bridge passage have been "third rail" kinds of issues for Electeds and Staff.

The SRC violates our policies to reduce drive-alone trips, but to say that is problematic. It is problematic not because it is tricky or non-obvious or convoluted or ambiguous; it is instead quite direct and easy. It is problematic because we don't actually believe, and want to carry out, what we say we believe. There are a couple of direct steps that are at least theoretically possible, for tolling and right-priced parking, but neither of those are at all popular. We do not yet have political and cultural norms around actually taking the robust steps that are necessary to actually reduce drive-alone trips.

That's a political and cultural problem, not a technical one.

* *What it really said is in Sections 2.2.6.13 and 2.3.5 in the draft EIS:*

A stand-alone transit/TSM/TDM alternative was dismissed because it was not able to address the mobility needs of the project—in particular, intersection congestion on the local street system at the bridgeheads. As a result, this alternative was dropped from further consideration. The approach to incorporating transit/TSM/TDM into the project is described and documented in the *Summary of Approach to Transit, TSM, and TDM in the Salem River Crossing DEIS* (7/23/10) memo (CH2M HILL, 2010c)....

[Consequently,] project alternatives were designed assuming that the future (year 2031) peak-hour traffic volumes across the river would be 8 percent less than those the current area traffic model forecasted. This 8-percent reduction in peak-hour traffic volumes across the river is derived from assumptions that, in 2031: (1) transit service crossing the river will expand, (2) the use of non-SOV (single-occupant vehicle) modes (such as carpooling and bicycling) will increase, and (3) some departure times will shift (for example, because of alternative work hours).

I cannot for the life of me find or remember the moment of origin for that 8% number. I'll revise and update here if I can come up with it. Even without that specific citation, in general it was more or less pulled out of the project team's nether regions in the late aughts. It's a SWAG!

MONDAY, OCTOBER 17, 2016

Two Interpretive Questions: Goal 1 for Part or Whole? What does Implement Mean?

In looking more closely at the *Findings Report* for the SRC actions, two centers of interpretation jump out.

One is whether Goal 1 on Citizen Involvement refers severally and individually to the parts of a process or whether it refers principally to the totality of a process.

The other involves several policies and requires a determination on what the word "implement" means.

Maybe these are grasping at straws and, especially in compressed time frames, it is difficult for interested citizens to discern marginal side issues from central key issues.

But it seems like an awful lot of the case for the UGB expansion right now depends on a particular interpretation of each of these. If those interpretations are wrong, then it does not seem difficult at all to say delay or even a halt is necessary.

On Goal 1 for Citizen Involvement

In the blizzard of documents the SRC team has posted to the City website, one of the most important is the *Findings Report*. As I understand it, this is most of the formal legal and technical argument to justify the UGB and TSP actions. So it is worth a closer reading. In fact, it may be the most important document to read, as one important

avenue for criticism is to contest directly the claims that are made in it.

That right there should be a *prima facie* case that there must be reasonable time for citizens to read and analyze the document. Citizens need to have time to absorb and respond to it.

Interestingly, its analysis of Statewide Planning Goal 1 wholly avoids this question, and instead focuses on the entirety of the 10 year process. The analysis trades on a slippery notion that the information has been out there for a very long time!

Even though there's nearly three pages of text here, I see it boiling down to this: Generally, Goal 1 is satisfied when a local government follows the public involvement procedures set out in its acknowledged comprehensive plan and land use regulations. Outreach and citizen involvement have been a central part of the NEPA environmental process for the SRC project for about ten years....

In summary, there has been a long history of public involvement in the NEPA process for the SRC Project....

The question comes down to other rulings and case law I guess. What does "planning process" refer to in this phrase: "Goal 1: Citizen Involvement - To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process."

If it only or mainly refers to the totality, then sure, the NEPA process has been a decade long. That's true. And the recitation of the "long history of public involvement" may satisfy the requirements.

But if it refers to the specific land-use matter at hand, the proposed UGB expansion and TSP amendments, then the process has been very compressed by design and lacks a "long history of public involvement."

And if it refers to the specific matter, then it fails broadly on these additional subgoals or policies from OAR 660-015-0000(1):

- Citizen Involvement -- To provide for widespread citizen involvement.
- Communication -- To assure effective two-way communication with citizens.
- Citizen Influence -- To provide the opportunity for citizens to be involved in all phases of the planning process.
- Technical Information -- To assure that technical information is available in an understandable form.

A separate subgoal is also relevant:

- Adoption Process – The general public, through the local citizen involvement programs, should have the opportunity to review and recommend changes to the proposed comprehensive land-use plans prior to the public hearing process to

adopt comprehensive land-use plans.

If I read the four numbered subgoals above in light of the "adoption process" paragraph, it seems obvious that there has not been an adequate "opportunity to review and recommend changes to the proposed comprehensive land use plans prior to the public hearing process." One of the paragraphs in the *Findings* would discuss the publication of the document, how much time had been allotted for a public response to it, and what some of the characteristics of the plan for public outreach would look like. But there is nothing like this.

So, again, if the settled law and interpretation on the matter is that it is the totality that matters, not individual milestones and hearings, no matter how substantial, then we're screwed.

It is interesting, then, that [the letter from DLCD](#) does not address Goal 1 compliance at all. Maybe this is a sign that it is the totality only that matters. It touches only on:

- Population forecast
- Goal 10 on multifamily housing
- Goal 12 and transportation
- Goal 14 on the UGB

[The previous letter](#) also touched on Goal 15 on the Willamette River Greenway.

So maybe the DLCD already knows Goal 1 only applies to the totality.

But if Goal 1 needs to be applied severally to each individual milestone in a process, it seems like there's a clear case that the SRC is not at all compliant at this moment.

A Question on the Interpretation of Implement/Implementation

With all the pieces together now in the *Findings*, it appears that some key justification for the SRC depends on a particular interpretation of the word "implement" and its variations. This is actually something of an interpretive crux.

Throughout several moments in the *Findings* analysis, there is the utter dependence on an assumption that the increase in transit, ridesharing, other demand management techniques, and bicycle and pedestrian use for trips across the existing bridge will reduce peak-hour vehicle volumes by 8 percent compared to volumes if these efforts were not implemented.

This is like magic! We can *assume all these things that we haven't yet done* in order to justify some other future action.

Does assuming these actions actually constitute "implementing" them?

Alternately, does the study and the assumption of its outcomes give you a pass on

implementation or function as a substitute for implementation?

Three moments in the Salem Comprehensive Plan, the State Highway Plan, and the Statewide Planning Goals assert that assuming these actions does constitute implementing them.

System Efficiency

(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.

(13) The Salem Transportation System Plan shall identify methods that citizens can use to commute to work and decrease overall traffic demand on the transportation system. Such methods include transit ridership, telecommuting, carpooling, vanpooling, flexible work schedules, walking, and bicycling.

Findings - System Efficiency:

As summarized in Chapter 2 (Project Background) of this Findings Report, the General Corridor Evaluation (2002), the Alternate Modes Study (2010), and the SRC Project DEIS (2012) included a robust consideration of alternative modes, transportation system management measures and demand management measures that could reasonably meet transportation needs, alone or in combination. The findings to address Criteria 660-024-0050(4) (page 92) are incorporated by this cross-reference and explain why a stand-alone alternate modes/TSM/TDM Alternative could not reasonably meet the identified transportation needs set forth in the purpose and need statements in the DEIS (see Section 2.4.2). However, the No Build and all Build Alternatives evaluated in the DEIS were designed assuming that the future peak-hour traffic volumes across the river (year 2031 for the DEIS and year 2040 for the FEIS) would be 8% less than those forecast in the SKATS regional traffic model. In other words, assuming a substantial increase in alternate modes/TSM/TDM was built into the transportation modeling for the SRC project to ensure that the future need of highway capacity was not overstated.

So what does "the implementation of [things]...shall be pursued as a first choice for accommodating travel demand" mean?

The *Findings Report* offers this interpretation: "the study of [things]" is sufficient to meet our Comprehensive Plan's requirements.

As I read it, the Comprehensive Plan requires the "implementation" of [things], not merely the study of them. And it requires that they fail first before widening.

So that's a bit of an interpretive crux. How has LUBA and others interpreted the word "implementation"? Is study that claims the implementation will fail sufficient to get around a requirement to implement?

The *Findings* also omit a discussion or analysis of policies 11 to "decrease reliance on the SOV" and 18 for "alternative travel modes other than the SOV." That's a real gap in the analysis.

So here's some obfuscation:

The background information in Section 2.3 (page 37) and the findings in 660-024-0050(4) (page 92) that address the priorities for major improvements articulated in Policy 1G are incorporated by this cross-reference to show compliance with the policy. WTF. Right. That's a barrier to citizen involvement right there. Every last damn one of the Technical Addenda has an "introduction" for section 1 that is the same boilerplate, report after report. Even if it was just a copy-and-paste job, they could have duplicated material from page 37 and 92 in the *Findings Report*. That cross-reference run-around just makes it difficult. (But for the record, the text "Policy 1G" also doesn't appear anywhere near pp. 37 or 92, instead appearing only in a very vague and general discussion on p.150. There is no developed analysis of compliance with Policy 1G. So this whole bit is something of a dodge. This is also consistent with the DLCD's observation that there are quite a number of gaps in the *Findings* analysis, including a different "circular cross-reference, [that does] not address Policy 1G.)

Anyway, we come back to the word "implement." In the Highway Plan, Policy 1G says to "implement" higher priority measures first. "Better access for alternate modes" is a higher priority than "adding capacity."

So what does "implement" here mean? Is "study" sufficient? Or do you actually have to construct and do stuff? By implication and extension, the *Findings Report* claims study is sufficient - though, again, they do not make this explicit claim with specific reference to Policy 1G.

Criteria – 660-012-0035(4):

(4) In MPO areas, regional and local TSPs shall be designed to achieve adopted standards for increasing transportation choices and reducing reliance on the automobile. Adopted standards are intended as means of measuring progress of metropolitan areas towards developing and implementing transportation systems and land use plans that increase transportation choices and reduce reliance on the automobile. It is anticipated that metropolitan areas will accomplish reduced reliance by changing land use patterns and transportation systems so that walking, cycling, and use of transit are highly convenient and so that, on balance, people need to and are likely to drive less than they do today.

Findings – 660-012-0035(4):

The proposed amendments to the acknowledged Salem and Polk County TSPs are designed to increase transportation choices and reduce reliance on the automobile. As discussed earlier, the DEIS and FEIS transportation analysis assumes that the increase

in transit, ridesharing, other demand management techniques, and bicycle and pedestrian use for trips across the existing bridge will reduce peak-hour vehicle volumes by 8 percent compared to volumes if these efforts were not implemented. The Preferred Alternative analysis also relies on these assumptions to compare the impacts of vehicular traffic; the distinction with the Preferred Alternative related to alternative modes is that it offers more travel choices for all modes relative to the No Build Alternative or Alternative 2A.

Reducing reliance on the automobile is also the focus of 660-012-0030(3). The findings in Section 3.1.3.1 (page 87) that address this provision of the TPR are incorporated by this cross-reference and summarize policies and benchmarks in Salem's Comprehensive Plan that have been acknowledged by DLCDC. The benchmarks are tied to new dwelling units built in proximity to transit stops and within activity nodes and corridors, jobs in activity nodes, rideshare growth, and increases in critical non-motorized and transit improvements.

The Preferred Alternative will include construction of new bicycle and pedestrian facilities on the new bridge, along with connections to facilities off the bridges. The improvements in connectivity and redundancy gained with an additional bridge across the Willamette River will also expand connectivity and redundancy for bicycle, pedestrian, and transit travel that can help reduce reliance on the auto. As set out in the proposed Salem TSP amendments, the Preferred Alternative includes a new facility that provides infrastructure for transit and non-motorized modes of transportation. The proposed TSP amendments increase transportation choices and make walking, cycling and use of transit more convenient with infrastructure that provides new access for these modes to areas around the bridgeheads, consistent with the requirements of the TPR.

It is interesting that something about "reducing reliance on the automobile" would not look at projected driving volumes and assess it empirically and ask whether it reduced VMT. [The SRC's own traffic projections say it will not reduce VMT](#). Somehow this is not a relevant matter for the *Findings* to discuss! Nor is any other measure of "reduced reliance on the automobile" proposed and modeled.

They do make reference to some benchmarks, and if I understand the reference right, there is [a contested history on them](#). It's hard to say whether they alone are sufficient to demonstrate "reduced reliance" or if more needs to be developed.

Certainly in the spirit of things, *actually reduced VMT* would seem to be more directly relevant than the percent of streets designated for bike lanes that actually have them in Salem, which was [one of the benchmarks](#).

Maybe on a technicality these benchmarks meet the requirement. But they are very indirect - and we come back to the question of norms. Because we don't yet have robust public norms around reducing drive-alone trips, we don't employ direct measures on reducing car use, like reductions in VMT or trip counts, and instead measure indirect things like the proportion of bike lane coverage. Which by the way, from 2008 to 2030

is supposed to go from 53% to 70%. That's underwhelming! Bike networks are only as good as they are complete. The fact that we can talk about spending \$500 million on a giant bridge and highway without also committing to 100% bike lane coverage and mending key gaps is evidence that we aren't actually very serious about reducing reliance on the automobile. In a plain reading of things, we should commit to 100% coverage before we build expensive new auto infrastructure, and we should want reductions in VMT to show that we are reducing our reliance on the automobile. Reducing reliance should mean actual reductions in car use, not marginal and assumed improvements in bike lane coverage.

Is a Study and its Assumptions really this Powerful?

So we're back to the definitional question: Is the *study* of something and claims deriving from its conclusion sufficient to meet the need for *implementation*? Under what conditions can "implementation" be more theoretical than actual?

The whole SRC process is making the 8% assumption do a lot of heavy lifting.

If there is a settled interpretation for "implementation" that allows for it to be mainly theoretical and an outcome of modeling, then we're screwed. But it may be that this is a tendentious and tortuous interpretation of "implementation," and it may be possible to demand actual implementation before widening and a halt to much of the SRC activity.

Conclusion

If there is a well established set of meanings for Goal 1 and for "implementation" that say Goal 1 only applies to the totality and that "implementation" doesn't have to mean actual construction or institutional programming, then there are a lot fewer grounds for criticism of the UGB proposal.

But on the other hand if with these interpretations of Goal 1 and "implementation" the SRC team is talking out of their nether regions, then there are some good reasons to halt the thing, at least temporarily.

Submitted by Jim Scheppke, 1840 E. Nob Hill, Salem, 97302.