

To: Olivia Glantz, Planning Division, 555 Liberty St. SE, Salem, OR 97301

From: Ron Eachus, 940 Salem Heights Ave S., Salem, OR 97301

RE: Comments Case No. SUB-ADJ19-02 Wren Heights Subdivision Tentative Plan

The application for the subdivision should be denied at this time because it does not meet three of the require criteria. No development of this size should be approved until the conditions of Salem Heights Ave S are improved.

The application does not meet Criteria SRC 205.010(d) – 5 *The street system in and adjacent to the tentative subdivision is designed so as to provide for the safe, orderly, and efficient circulation of traffic into, through and out of the subdivision.*

It does not meet criteria SRC 205.101(d) – 6 *The tentative subdivision plan provides safe and convenient bicycle and pedestrian access from within the subdivision to adjacent residential areas and transit stops, and to neighborhood activity centers within one-half mile of the development.*

It does not meet criteria for SRC 205.010(d) – 7 *The tentative subdivision plan mitigates impacts to the transportation system consistent with the approved Traffic Impact Analysis.*

It fails to meet these criteria because it decreases the safety of vehicular, pedestrian and bicycle traffic on Salem Heights and those impacts are not mitigated by the subdivision design. Salem Heights is designated as a “collector street” by the 2016 Salem Transportation System Plan. However, it is also identified as a collector street not built to “urban standards.” The TSP states that to meet urban standards, improvements to Salem Heights, and similar streets, “should include two travel lanes, turn lanes where necessary, curbs, sidewalks, drainage, illumination, and bicycle lanes, where needed.”

Salem Heights is already an unsafe street. The subdivision will only make it more unsafe by adding a significant amount of traffic to a street that currently has narrow lanes, no sidewalks, no bike path and inadequate lighting.

In their written narrative accompanying their filing, the applicants assume that the design of the development will add an estimated 315 vehicular trips per day on Salem Heights, an amount they claim will be “negligible.” For a collector street like Salem Heights that is not up to urban standards, the addition of such a volume of traffic all at once is not negligible. And the design of the subdivision and the inclusion of sidewalks along the Salem Heights side of the property do not mitigate the impacts because those impacts affect the entire street and everyone who uses the street, particularly pedestrians. After adding the traffic, the conditions for the rest of the street without sidewalks will be worse.

The design should be altered so that traffic is not directed to Salem Heights until the street is brought up to urban standards. This can be done by eliminating the Doughton Street connection to Salem Heights, diverting exit from the subdivision to Hansen Street which is an

improved collector street with adequate infrastructure. Once Salem Heights is brought to urban standards, a Doughton Street connection can be completed.

In conclusion, the additional traffic the subdivision will bring to Salem Heights will only exacerbate the safety conditions of Salem Heights and the detrimental effects of those impacts on the safety and quality of life in the neighborhood are not mitigated by the subdivision design. The subdivision should be denied until Salem Heights is brought up to collector street urban standards. In the alternative, any approval should be conditioned on postponing any through street connection to Salem Heights until after Salem Heights is improved to collector street urban standards.

Other Concerns:

In addition to the above I'd also like to express some other concerns the City of Salem should take into account during its review process.

1. Tree removal

While the Tree Conservation Plan may meet city requirements, this is a subdivision that encompasses a sizeable land mass in the neighborhood with nearly 200 trees that have become part of the neighborhood environment in terms of both ecology and aesthetics. It is one thing to cut down two-thirds of the trees on a plot with a few trees. But taking 122 out of 191 is a big change. The City ought to do a thorough review of the proposed tree conservation plan with an eye toward increasing the number of trees which are kept.

2. Sidewalks

The plan, if approved, would include sidewalks where the subdivision runs along the north side of Salem Heights. The sidewalks installed by the developer should not become the template for future sidewalks under any plan for improving the safety of Salem Heights. Sidewalks will be necessary to improve Salem Heights to urban standards for a collector street. However, flexibility will be necessary for further sidewalk infill along the street. It is one thing to require a new development to set-aside a certain width for sidewalks. It is another to require the same set-aside when it requires altering the frontage of an existing home. The City should make it clear that the remainder of Salem Heights will not be required to replicate the subdivisions sidewalk set asides in any future sidewalk infill plans and that the residents of the neighborhood will be involved in development of any future improvement plan to determine size and location of any sidewalk designs.