April 10, 2019

Olivia Glantz, Planner III City of Salem Community Development Department

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

Ms. Glantz,

The SWAN board is in agreement with the comments provided by the neighbors who live near the area of the proposed subdivision and recommend that no development should be approved until conditions regarding the criteria below are improved.

5) SRC 205-010(d) 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.

6) SRC 205-010(d) 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 with one-half mile of the development.

The Wren Heights development does not meet these criteria as Salem Heights Ave. is currently not built to "urban standards" for a collector street which would normally include "two travel lanes, turn lanes where necessary, curbs, sidewalks, drainage, illumination, and bicycle lanes, where needed" according to the 2016 Transportation Plan (TSP). Salem Heights Ave. has narrow lanes, limited vehicular visibility in certain areas, no sidewalks, no bike lane and inadequate lighting. With these unsafe conditions, funneling onto Salem Heights Ave. as a "collector street" as the subdivision plan does will only make these conditions worse. The design should be altered so that traffic is not directed to Salem Heights Ave. until the street is brought to urban standards.

It should also be noted that Salem Heights Ave. is designated for a future Uphill/Downhill Shared Bike Lanes Pathway on the Salem Transportation Plan (TSP) which further supports bringing Salem Heights into compliance with urban standards for bicycle lane safety.

7) SRC 205-010(d) The tentative subdivision plan mitigates impacts to the transportation system consistent with the approved Traffic Impact Analysis.

The applicant estimates that the subdivision will generate approximately 315 vehicular trips per day on Salem Heights which it considers "negligible". Salem Heights does not meet this criterion given the unsafe and noncompliant "urban standards" conditions that currently exist as mentioned above. This extra traffic will make conditions worse for bicycles on the narrow shared road and for pedestrians who must walk where there are no sidewalks, in particular children walking to and from nearby Candalaria and Salem Heights schools. The subdivision plan should be redesigned to divert traffic away from Salem Heights, or any through street connecting to Salem Heights should be postponed until collector urban standards are met on Salem Heights.