

## Olivia Glantz

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**From:** danka8@juno.com  
**Sent:** Monday, September 30, 2019 3:39 PM  
**To:** Olivia Glantz  
**Subject:** SUB-ADJ 19-08 Coburn Estates

In its Traffic Impact Analysis for Coburn Estates, ATEP states the following: "The study assumed that traffic will continue to grow at 1.6% per year over the next 10 years consistent with growth projects used for Salem east of the Willamette River." There are four problems with this study basis. Traffic is assumed to continue growing at a presumed pre-existing rate. What is the rationale for this belief? Is it unreasonable to believe that growth might be higher? And if it turns out to be higher, what are the consequences for the developer? None, obviously, but motorists will certainly face negative consequences. The TIA should explain the reason for this belief. The 1.6% growth rate is demonstrably wrong. Kittleson's traffic study, "Existing 2007 Zoning Total Traffic Conditions Weekday PM & Saturday Midday Peak Hours" states the following traffic count at the Kuebler/Battle Creek intersection: Weekday PM Westbound 1,080 In January 2018 the count at the same intersection is 1,664. That represents an increase of 5.4%. At 27th & Kuebler, the respective westbound counts are 1,315 and 1,730 for a 3.2% increase. If the latter less benign figure is used, ATEP's growth rate is under by 100%! Just because other projects used this growth rate does not make it valid. Lastly, the development cannot be equated to projects in Salem east of the Willamette River. This is patently ridiculous. I can cite many relatively new and forthcoming projects both east and west of I-5 which feed or will feed traffic on the study streets. Development in South Salem has been and will be much greater than North Salem. Use of this erroneous growth figure skews the entire study. Indeed, it invalidates it. When traffic studies are paid for by the developer, one can be sure the study will be biased on the developer's behalf. TIAs should not be merely one item to be checked off in the approval process. Rather, they should accurately and honestly reflect reality. All the citizens of Salem deserve better. Dan Reid Ward 3

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