

Rogue Advocates
P.O. Box 633
Ashland, Oregon
97530

RE: Grandview Terrace

Ashland Planning Commission,

October 10, 2022

We sincerely thank you for the opportunity to present more specific written comments following our brief oral comments at the conclusion of the previous Type 3 review hearing of the proposed Grandview Terrace apartment development. Our comments will primarily address the traffic and personal safety issues that will be created if this project for 230 units is approved as presented and designed.

It may be helpful to step back from the volume of the applicant's printed material and consider the real impact on the community of adding a significant number of cars and people entering and exiting this hazardous section of Highway 99 approaching Ashland. I have driven this section at peak hours going to work or returning to our shop in Talent for forty years. The speed limit is 45 mph and my loaded van is often being passed as I drive the speed limit. Folks jockey for position, sometimes using the bike lane to get ahead as they approach the road diet and that is where the entrance to the 236 unit development is located. Drivers, pedestrians and bicyclists will be in harms way as additional traffic attempts to leave or return to these proposed apartments. Will the existing traffic safety hazards in this section of Highway 99 remain the same or be reduced? No, that is impossible as designed.

HIGHWAY 99 TRAFFIC: Sandow Engineering has developed a traffic impact study (TIS) in an attempt to assess the affect 212 additional cars will have on the existing traffic flow on State Highway 99 as folks enter and exit the City of Ashland at the north end of town. Sandow has entered data into two software programs used to assess the impacts. Those programs are the Synchro Model and Simtraffic. The traffic engineer states the results conform to AASHTO standards. However, in the record ODOT comments by Michael Wang dated 10/25/2019 challenged the computerized data summary. Following is the Sandow response

dated 2/3/2020 that states “As Sandow Engineering understands it, the road diet has created an unstable traffic flow...Unfortunately, this type of instability within the system is not able to be modeled within Synchro.”

The Synchro model was completed following all standards and methodology typically required for this type of project. As Sandow Engineering understands it, the road diet has created an unstable traffic flow. What this means is that the traffic flow can be moving as normal and something within the system will cause a delay in travel that will cause backups for the remainder of the peak travel time. This delay is commonly caused by buses stopping to pick up/drop off riders, garbage trucks stopping, vehicles stopping for pedestrians not crossing at signalized intersections, and other factors within the roadway. Unfortunately, this type of instability within the system is not able to be modeled within Synchro.

If the traffic engineer acknowledges their computer traffic simulation software does not accurately reflect reality, how can the Planning Commission rely on these studies to predict acceptable “traffic delays” and safety from additional ingress/egress impacts from the development? Sandow “tweaks” the data in an attempt to satisfy ODOT, but garbage in/garbage out fails to reflect the reality of actual traffic flows. The traffic studies are seriously flawed, and the road diet is likely not the primary culprit. Please let me explain the real world problem per experience.

Traffic approaching the development from the North entering Ashland is constricted by the “road diet”, but also compressed by the signals at Valley View Road. Vehicles coming off I-5 down Valley View often develop a long queue that backs up all the way to the freeway and are unable to all enter Highway 99 on one green light. Then cars waiting at the red light approaching Ashland on Highway 99 from Talent create the next compression of cars flowing in front of the development.

These strings of cars with few breaks during peak hours will inevitably create long lines of vehicles waiting to exit the development. The TIS states in a single exit lane from the development only two or three cars will be in line to exit the development, but that calculation seems to be a fantasy in reality considering over 200 vehicles at the development.

Vehicles leaving Ashland the other direction heading north along Highway 99 are also compressed due to the “road diet” and traffic lights that control the flow of

northbound vehicles exiting Ashland. Tenants exiting the development must hope that the bunched flows on Highway 99 in both directions can be properly timed to allow safe egress from the development, and that this timing occurs quickly enough to not create congestion behind them.

Additionally, don't forget to look for pedestrians and bicyclists that the development encourages. The traffic study fails to address the reality that we all know to exist on this stretch of Highway 99 in front of the development. Approval as designed will create a safety and traffic nightmare.

INTERSECTION SIGHT DISTANCE An additional component of ingress/egress is proper sight distance for an exiting vehicle to clearly see oncoming traffic. Pictures on page 16-17 of the Sandow traffic study show the required "clear line of sight" for Intersection Sight Distance (ISD) in each direction. Looking south the ISD is just before the train tressle. Looking north the ISD is just before the large storage container at Anderson Auto Body. There is no room for error in either direction.

What is not pictured looking south is that northbound traffic will entirely obscure the "clear line of sight" to the ISD. Breaks between traffic will allow sight, but the compressed traffic pattern of the "road diet" will often completely obscure oncoming northbound traffic for extended periods. Trucks and vans significantly impact the "clear line of sight". In a practical sense the ISD does not conform to the ASSHTO standard. Vehicles turning north from the development across traffic might have to gamble there will not be an oncoming vehicle they can't see. The slope of the road compounds this issue for both visibility as well as cars gaining speed on the downslope.

PARKING The applicant's traffic study uses the number 212 as this is the number of parking spaces that are proposed in the application, even though 236 units will be constructed. The 212 parking spaces are the minimum allowed per the Ashland Development Code with 24 credits applied for alternative transportation developments adjacent to the site. The Commission should consider if this number of spaces will actually be adequate for the full occupancy of the proposal. There is no evidence presented that some units will have no cars while some units may have more than one car.

There has been no allowance for guest parking while folks visit their friends in this 236 unit development. There has been no allowance for service vehicles that will inevitably be present to provide maintenance for the apartments. There is no allowance if a couple sharing a unit have two cars. No mitigation is presented, as there is no street parking allowed along the State Highway 99 in front of the complex. At a minimum these issues of overflow parking must be revisited by the developer.

Thank you for the opportunity to submit these comments.

Steve Rouse
Rogue Advocates Vice President



Oregon

Kate Brown, Governor

Department of Transportation
Region 3 Planning and Programming
100 Antelope Drive
White City, Oregon 97503
Phone: (541) 774-6299

October 10, 2022

Mr. Derek Severson
City of Ashland – Community Development
51 Winburn Way
Ashland, OR 97529

RE: PA-T3-2022-00004, 1511 Highway 99 North

Dear Mr. Severson,

Thank you for providing the Oregon Department of Transportation (the “Department” or “ODOT”) with the opportunity to provide comments associated with the proposed annexation and zone change of approximately 16.86 acres at 1511 Highway 99 North (“Subject Property”). ODOT has worked with the City and the applicant to try to find solutions which work for all parties. ODOT supports the proposal with conditions described below.

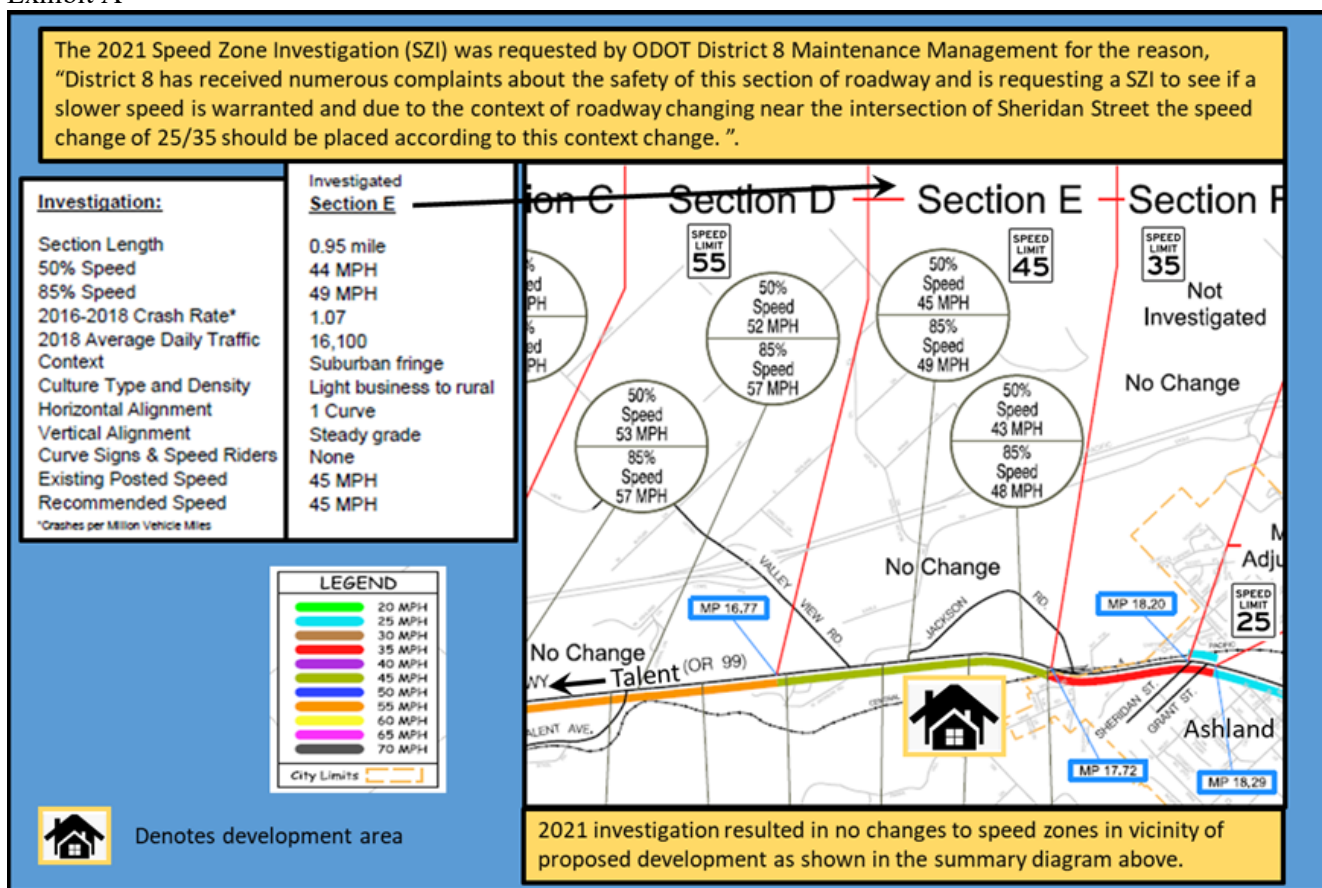
- i. ODOT has reviewed the Traffic Impact Analysis (“TIA”) prepared by Sandow Engineering and generally agree with the findings, believing that the analysis satisfies the requirements of the Transportation Planning Rule related to Plan and Land Use Amendments (OAR 660-012-0060).
- ii. ODOT supports frontage improvements consistent with City of Ashland standards and the adopted Transportation System Plan, which exceed minimum standards identified in the State Highway Design Manual. We understand Right-of-Way constraints will require exceptions in certain locations.
- iii. The most recent set of civil plans will need to be further refined prior to approval by ODOT. City of Ashland Municipal Code 18.4.6.030 requires installation of public improvements prior to issuance of building permits. No disturbance or construction within the State Right of Way is permitted until the applicant has obtained an ODOT misc./utility permit. Legal access will not be granted to Highway 99 North until the applicant has obtained an ODOT reservation indenture and access permit.
- iv. Refined civil plans will need to incorporate:
 - a. Access points and curb cuts along the frontage improvements at existing accesses
 - b. Details related to the striped pedestrian crossing and rectangular rapid flash beacons (“RRFB”) in the vicinity of North Main Street.
- v. ODOT has had discussions with the City, the applicant and Rogue Valley Transit District about the proposed bus pull out and bus stop within the State Right of Way and is supportive pending review and approval of final civil plans.
- vi. ODOT’s Region 3 staff supports the proposal for a striped crossing and RRFB. ODOT Region 3 Traffic evaluated a number of potential locations, and recommend a location south of the Subject Property near North Main Street. Approval from the State Traffic Engineer in Salem will be required once civil plans have been reviewed and accepted by local staff.
- vii. ODOT will require a drainage report demonstrating the proposal will not adversely affect State facilities consistent with standards in the ODOT Hydraulics Manual Chapter 4 Appendix C. We understand this will be conducted during the final engineering phase of the project.

ODOT Region 3 Traffic staff conducted a Speed Zone Investigation (the “Investigation”) along Rogue Valley Highway (OR99) which was completed in June 2021 to determine whether a lower posted speed limit is warranted. The study examined speeds along OR99 from approximately Hartley Rd in the City of Talent to Grant Street in the City of Ashland.

The study methodology included evaluation of the roadway context, intersecting streets, horizontal and vertical alignment of the Highway, existing traffic data, and speed data collected on-site during the Investigation. The Subject Property is located within an area of the Investigation identified as “Section E” which extends from approximately Valley View Road to the trestle north of Jackson Road. The investigation found a 50th percentile speed of 44mph, and an 85th percentile speed of 49mph.

The speed of existing traffic is one of the factors considered when evaluating whether a speed reduction is appropriate. The rationale is that simply changing the posted number generally doesn’t make the facility safer as a stand-alone measure. This can lead to large speed differentials with the possibility of increasing aggressive and dangerous driving maneuvers. As the physical context of the roadway changes, such as narrowing the travel lanes, installation of frontage improvements, and traffic calming measures a natural decrease in vehicle speeds is expected. Evaluation criteria is weighted differently within urbanized areas in city limits versus rural unincorporated areas. ODOT recommends the City request a new speed zone investigation after development and installation of frontage improvements so posted speeds can be established based on the new driving culture created by the existence and roadside improvements associated with this development proposal.

Exhibit A



Please feel free to contact me at Micah.HOROWITZ@odot.state.or.us or 541-774-6331 should you have any questions or concerns.

Sincerely,

Micah Horowitz

Micah Horowitz, AICP
Senior Transportation Planner



Oregon

Kate Brown, Governor

Department of Transportation
Region 3 Planning and Programming
100 Antelope Drive
White City, Oregon 97503
Phone: (541) 774-6299

October 10, 2022

Mr. Derek Severson
City of Ashland – Community Development
51 Winburn Way
Ashland, OR 97529

RE: PA-T3-2022-00004, 1511 Highway 99 North

Dear Mr. Severson,

Thank you for providing the Oregon Department of Transportation (the “Department” or “ODOT”) with the opportunity to provide comments associated with the proposed annexation and zone change of approximately 16.86 acres at 1511 Highway 99 North (“Subject Property”). ODOT has worked with the City and the applicant to try to find solutions which work for all parties. ODOT supports the proposal with conditions described below.

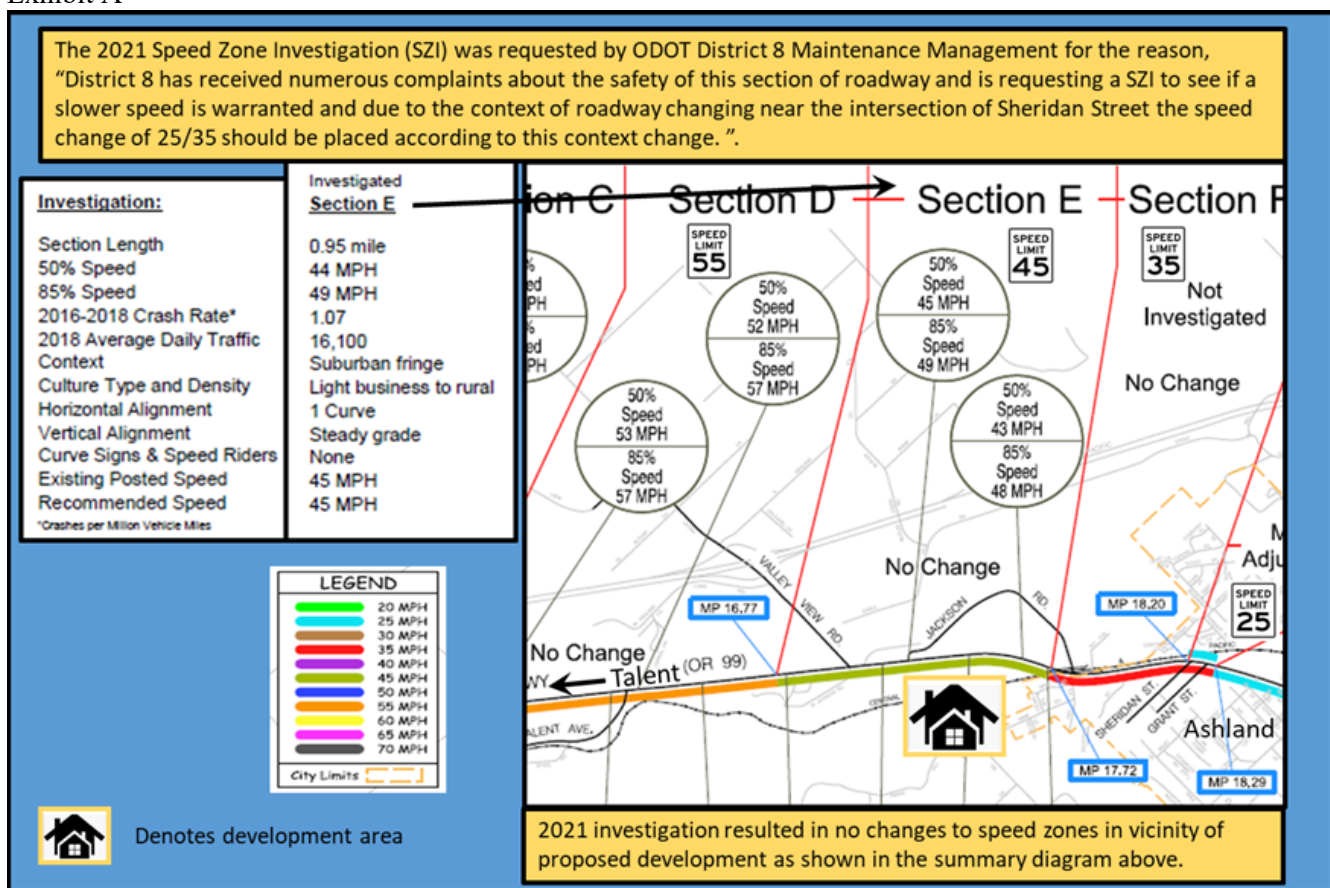
- i. ODOT has reviewed the Traffic Impact Analysis (“TIA”) prepared by Sandow Engineering and generally agree with the findings, believing that the analysis satisfies the requirements of the Transportation Planning Rule related to Plan and Land Use Amendments (OAR 660-012-0060).
- ii. ODOT recommends buffered sidewalk and curb frontage improvements consistent with City of Ashland standards and the adopted Transportation System Plan, which exceed minimum standards identified in the State Highway Design Manual.
- iii. The most recent set of civil plans will need to be further refined prior to approval by ODOT. City of Ashland Municipal Code 18.4.6.030 requires installation of public improvements prior to issuance of building permits. No disturbance or construction within the State Right of Way is permitted until the applicant has obtained an ODOT misc./utility permit. Legal access will not be granted to Highway 99 North until the applicant has obtained an ODOT reservation indenture and access permit.
- iv. Refined civil plans will need to incorporate:
 - a. Access points and curb cuts along the frontage improvements at existing accesses
 - b. Details related to the striped pedestrian crossing and rectangular rapid flash beacons (“RRFB”) in the vicinity of North Main Street.
- v. ODOT has had discussions with the City, the applicant and Rogue Valley Transit District about the proposed bus pull out and bus stop within the State Right of Way and is supportive pending review and approval of final civil plans.
- vi. ODOT’s Region 3 staff supports the proposal for a striped crossing and RRFB. ODOT Region 3 Traffic evaluated a number of potential locations, and recommend a location south of the Subject Property near North Main Street. Approval from the State Traffic Engineer in Salem will be required once civil plans have been reviewed and accepted by local staff.
- vii. ODOT will require a drainage report demonstrating the proposal will not adversely affect State facilities consistent with standards in the ODOT Hydraulics Manual Chapter 4 Appendix C. We understand this will be conducted during the final engineering phase of the project.

ODOT Region 3 Traffic staff conducted a Speed Zone Investigation (the “Investigation”) along Rogue Valley Highway (OR99) which was completed in June 2021 to determine whether a lower posted speed limit is warranted. The study examined speeds along OR99 from approximately Hartley Rd in the City of Talent to Grant Street in the City of Ashland.

The study methodology included evaluation of the roadway context, intersecting streets, horizontal and vertical alignment of the Highway, existing traffic data, and speed data collected on-site during the Investigation. The Subject Property is located within an area of the Investigation identified as “Section E” which extends from approximately Valley View Road to the trestle north of Jackson Road. The investigation found a 50th percentile speed of 44mph, and an 85th percentile speed of 49mph.

The speed of existing traffic is one of the factors considered when evaluating whether a speed reduction is appropriate. The rationale is that simply changing the posted number generally doesn’t make the facility safer as a stand-alone measure. This can lead to large speed differentials with the possibility of increasing aggressive and dangerous driving maneuvers. As the physical context of the roadway changes, such as narrowing the travel lanes, installation of frontage improvements, and traffic calming measures a natural decrease in vehicle speeds is expected. Evaluation criteria is weighted differently within urbanized areas in city limits versus rural unincorporated areas. ODOT recommends the City request a new speed zone investigation after development and installation of frontage improvements so posted speeds can be established based on the new driving culture created by the existence and roadside improvements associated with this development proposal.

Exhibit A



Please feel free to contact me at Micah.HOROWITZ@odot.state.or.us or 541-774-6331 should you have any questions or concerns.

Sincerely,

Micah Horowitz

Micah Horowitz, AICP
Senior Transportation Planner

From: [Rich Rohde](#)
To: [Planning Commission - Public Testimony](#)
Subject: 10/11/22 PC Hearing Testimony"
Date: Monday, October 10, 2022 8:50:01 PM

[EXTERNAL SENDER]

October 10, 2022

TO: Ashland Planning Commission

Dear Planning Commissioners,

As a longtime resident of the city of Ashland I am very supportive of the request for the Annexation of 16.86 acres located at 1511 Highway 99 North into the City of Ashland, along with 6.6 acres of adjacent Oregon Department of Transportation state highway right-of-way and 7.68 acres of California Oregon & Pacific railroad property.

1. First and foremost this housing plan is a wonderful example of much needed and prioritized workforce housing.

The scale of this

proposal can actually make an important contribution to addressing our severe housing shortage for Ashland workers in ways that are

almost unique in our area. 230 units with 37 permanently affordable homes is amazing. Nothing we have seen except the Snowberry II homes on Clay St are comparable.

2. With our outstanding inclusionary policies in Ashland having mixed in 37 very permanently affordable homes makes this project a vital next step for our plans for truly diverse/ inclusionary neighborhoods.

3. With the relentless gentrification that our city is experiencing we must take this step now to reverse our slide into a white monoculture. While there are some important hurdles to insure that the transportation/ evacuation infrastructure will be in place I am confident that the ability of the applicant, city staff and planning commission will adopt plans that will accomplish these goals.

This proposal is vitally important to the kind of city we want to become. And I support your approval.

Rich Rohde

124 Ohio St

Ashland, OR 97520

rvoarich@yahoo.com