

Portland, Oregon

May 11, 2022

Project #: 27861.0

Woodburn Planning Commission
Attention: Planning Division
City of Woodburn
270 Montgomery Street
Woodburn, OR 97071

RE: Woodburn Fast Serv Inc. and LB Group, LLC; City File No. CU 21-02

Dear Commissioners:

At the request of Woodburn Fast Serv Inc. and LB Group, LLC, we have reviewed the Traffic Impact Analysis (TIA) submitted in support of City Case File No. CU 21-02 and offer the following comments for your consideration.

- 1) The TIA does not account for traffic associated with the new Amazon facility. Confidential discussions about the new Amazon facility began with City staff in 2020. Public awareness of this project as an in-process development existed prior to the time the TIA was submitted. The Amazon facility is now an approved project and work is well underway in completing the building and beginning operations. Due to the size of the facility that is now under construction and the nature of its operations, the traffic-related effects of this approved development should be recognized and taken into account by this TIA.
- 2) The TIA relied on background traffic volume counts conducted in 2019. Recent (2021) traffic counts in the area of the I-5/Woodburn interchange are 15-25% higher than the 2019 base counts relied upon in the TIA. Reliance on 2019 traffic counts is problematic for at least three reasons: a) they are three years old; b) they are measurably lower than counts conducted in 2021; and c) they do not reflect any long-term travel behavior changes that were initially instigated by the pandemic. The TIA will provide a more accurate characterization of traffic conditions within the site vicinity if the base traffic volumes are updated to reflect current conditions.
- 3) No queuing analysis was performed for critical lane groups at the intersections that were studied. This is a particularly important consideration with respect to the through- and left-turning vehicle queues on the EB approach on OR 214 to Oregon Way. It is important because the right-out movement being proposed to be maintained from the development onto OR 214 could be affected if queue backups at the downstream signal make it difficult for vehicles leaving the site to enter OR 214 safely. Drivers wanting to make a U-turn at Oregon Way to return to the freeway or other destinations to the west may be most severely affected by long queues at this intersection. Likewise, no queuing analysis was reported for the full access drive to Oregon Way. It would therefore be prudent to determine and report the 95th percentile queue lengths for all movements at all studied intersections to guard against unintended safety or operational problems.
- 4) The TIA found operational issues at the OR 219/Evergreen Road intersection. This finding is similar to what was found when Amazon completed its own TIA. For Amazon, the City conditioned a proportional share contribution toward a future intersection improvement, but it does not appear that a similar condition has been imposed upon this particular application. The City should consider imposing a similar condition for purposes of both consistency and fairness.

We hope these comments are useful and believe the Planning Commission will be able to reach a more informed decision after it receives and evaluates the additional information recommended in the comments above.

Sincerely,


Wayne Kittelson
Senior Principal Engineer

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COMMUNITY DEVELOPMENT
DEPARTMENT