



April 4, 2023

To: Oregon Department of Transportation % ODOT.STIP@odot.oregon.gov
Oregon Transportation Commission

From: Phil Carver, Bob Cortright, 350 Salem OR

Subject: DRAFT STIP PROJECT 13188: OR22: Rickreall to Doaks Ferry

The proposed \$11 million for preliminary engineering and right-of-way acquisition for a new interchange and related roadways at this location should not be included in the 2024-27 STIP. ODOT should instead - consistent with the Governor's Climate Action Plan (EO 20-04) - re-engage with stakeholders to plan an affordable, achievable set of safety and operational improvements for this area that will avoid inducing increased vehicle travel and greenhouse gas emissions and cost less than this very expensive proposal.

The proposed interchange project would violate Executive Order 20-04

EO 20-04 directs that state agencies -including ODOT and OTC - to use whatever authority and discretion they possess to take actions that help implement state goals to reduce GHG emissions.¹

This project violates EO 20-04 because ODOT has neither evaluated GHG impacts of this project nor considered actions that would address transportation needs without increasing GHG emissions. The proposed interchange would significantly increase capacity for single occupant vehicle commuting between Independence and the Salem-Keizer area, which would induce additional VMT and greenhouse gas emissions. However, ODOT has neither evaluated GHG impacts of the proposed project nor considered actions to address transportation needs in a manner that would help achieve GHG emission reduction goals. As outlined below there are a range of actions within ODOT's authority that could substantially improve safety and operations without inducing additional emissions and at an affordable cost.

ODOT and the OTC have "authority and discretion" vested by law to implement other solutions to address transportation needs in this area. As the owner and manager of the state highways in question (Highway 22 and 51) ODOT has broad authority to manage and plan modifications or improvements within the right-of-way, and to fund and coordinate supporting actions by other agencies.

¹ Specifically Section 3 of EO 20-04 says: "State agencies shall use any and all authority and discretion vested in them by law to help facilitate achievement of Oregon's GHG emission reduction goals ... and "...to the full extent allowed by law agencies shall consider and integrate ... GHG emission reduction goals into their planning, budgets, investments, and policy making decisions."

There are affordable, low-cost safety and operational improvements that can adequately address transportation needs in this area; and implementation of such improvements is required by the Oregon Highway Plan

The Major Improvements Policy in the Oregon Highway Plan (Policy 1G and Action 1G.1) directs that ODOT defer major improvements to the state highway system in favor of minor and modest operational and safety improvements to address transportation needs. Action 1G.1 applies to project and planning and to adoption and amendment of the Statewide Transportation Improvement Program (STIP).

Policy 1G: Major Improvements

It is the policy of the State of Oregon to maintain highway performance and improve safety by improving system efficiency and management before adding capacity. ODOT will work in partnership with regional and local governments to address highway performance and safety needs.

Action 1G.1

Use the following priorities for developing corridor plans, transportation system plans, the Statewide Transportation Improvement Program, and project plans to respond to highway needs. Implement higher priority measures first unless a lower priority measure is clearly more cost-effective or unless it clearly better supports safety, growth management, or other livability and economic viability considerations. Plans must document the findings which support using lower priority measures before higher priority measures.

1. *Protect the existing system.* The highest priority is to preserve the functionality of the existing highway system by means such as access management, local comprehensive plans, transportation demand management, improved traffic operations, and alternative modes of transportation.
2. *Improve efficiency and capacity of existing highway facilities.* The second priority is to make minor improvements to existing highway facilities such as widening highway shoulders or adding auxiliary lanes, providing better access for alternative modes (e.g., bike lanes, sidewalks, bus shelters), extending or connecting local streets, and making other off-system improvements.
3. *Add capacity to the existing system.* The third priority is to make major roadway improvements to existing highway facilities such as adding general purpose lanes and making alignment corrections to accommodate legal size vehicles.
4. *Add new facilities to the system.* The lowest priority is to add new transportation facilities such as a new highway or bypass.

A range of alternative actions are available for addressing transportation needs in this area that would do so in a manner that is consistent with EO 20-04 and reducing climate emissions. These include:

Expand transit service focusing on commute service between Independence and downtown Salem by increasing frequency and improving service on Cherriots Regional

Route 40X (the Polk County/Salem Express) with 15 or 20 minute service in the morning and evening commute hours.

Provide commute incentives and alternatives for Independence residents -

Work with the state and other major employers in the Salem-Keizer area to provide incentives for Independence area commuters to use transit, share rides, and adopt flexible work schedules to reduce peak hour commutes.

Improve safety for afternoon commuters to Independence by:

- Lowering the speed limit on Highway 22 in the vicinity of the 51 intersection to 45 mph
- Installing a roundabout or a smart traffic signal² at the Highway 51 intersection. ODOT is planning to install roundabouts on several nearby intersections.³
- Widening the Highway 22 left turn lane to provide additional separation from through lanes and add lighting in the intersection area to improve visibility.
- Improving the left turn lanes from Highway 22 to South Oak Grove Road and Greenwood Road to provide additional capacity for afternoon peak hour left turns to access Highway 51.
- Make improvements that encourage western Independence area residents to use the Highway 99W interchange for the afternoon commute home.
- Restrict 52nd and 55th to right-in and right out only and instead provide for a “J” turn via a U turn at Oak Grove Road⁴

The interchange proposal should also be rejected because it is an unaffordable solution that cannot be implemented any time soon

This project is also excessively expensive. ODOT has declined 350 Salem’s request to provide a cost estimate for this project and has prepared only a high-level estimate for the interchange itself of \$25-40 million dollars. This estimate apparently does not include the cost of extensive “access roads” that would be constructed as part of the project. Past practice suggests that ODOT’s initial “high-level” estimates dramatically underestimate actual project costs. Funding for highway projects is extremely limited and likely to decline in the future as cars become more efficient and gas tax revenue declines. This means the project is unlikely to be built anytime soon and that the cost of this project is highly disproportionate to the benefits to the traveling public at large.

² A “smart traffic signal” would provide for left turns from Highway 22 to Highway 51 that activates in the afternoon peak (or in other peak travel conditions). The signal would stop eastbound traffic on Highway 22 to allow these left turns. This would include advisory or warning lights for approaching traffic when the left turn signal is activated. At other times of the day, when traffic is light, the existing condition would remain in place.

³ ODOT is planning to construct roundabouts at the following nearby intersections: [Highway 22 at Kings Valley Highway](#) (5 miles west of Highway 51); [Highway 99W at Clow Corner](#) (5 miles southwest) and on [Highway 18 at Lafayette Highway](#) (19 miles north)

⁴ See NCHRP 650 <https://onlinepubs.tpub.com/onlinepubs/nchrp/paths/ruralintersections.pdf>

Conclusion

A new interchange at Highway 51 would induce additional travel and commuting from Independence to Salem that will increase rather than reduce vehicle miles traveled (VMT) and greenhouse gas emissions contrary to state goals and Executive Order 20-04. EO 20-04 is a new requirement that ODOT **must** comply with. To comply with this executive order, ODOT should reconsider the need for this project and consider and select an affordable solution that improves safety that is consistent with meeting GHG reduction goals.

In order to comply with EO 20-04, ODOT needs to go back to the drawing board and consider actions and alternatives within its authority and discretion that would implement and be consistent with EO 20-04 and to comply with the OHP , including the various actions and alternatives identified above.