

T3-2022-16220 Comments

1 message

Emily Hafer <emily.Hafer@ortrail.k12.or.us> To: LUP-Comments@multco.us Mon, Aug 7, 2023 at 11:52 AM

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To the Hearing Officer,

I am addressing MCC 39.7015 Conditional Use Approval Criteria: [A][1] Consistent with the character of the Area; and [A][6] Will not create hazardous conditions.

I have reviewed the Construction Traffic Impact Analysis and would like to make comments regarding some statements made therein. I am the principal of Oregon Trail Academy, and am looking at possible hazardous conditions that the construction and daily use of the filtration facility would have on the students and staff at OTA.

Page 1: Intersections within 2 miles of our school:

#11. 190 feet B. 335 feet #10: .8 mile #12: .9 mile #8. 1.5 miles #6: 1.6 miles #13. 1.8 miles #9. 1.9 miles

Of the 17 intersections studied, 8 (eight) of them are very close to our school. That is 47% of the studied intersections. Two are within 400 feet of our school. Although the study states on page 1 that "the collective construction traffic will have minimal impacts on intersection and roadway operations" that is hard to believe.

The study focused on delays (page 12) but there is more than just waiting 10 seconds or 11.3 seconds at intersections #10 and #11 (page 12). The trucks will bring noise, dust, and increased danger to our roadways.

Truck Routes 3 and 4 (page 10) all use Site Access B, which is a road 335 feet from our school **that parallels our playground yard**. Truck Route 4 is especially dangerous, as it will have to navigate the five-point intersection (#11), make the curve at Bluff, which was noted by Oregon Trail School District's Business Manager, Timothy Belanger, in a letter submitted, to be particularly dangerous as the district repairs fencing at this curve every year due to car run offs.

While Oregon Trail Academy's traffic queueing was observed and reported correctly on page 21, that most of our queueing occurs on Proctor Road, **we still have families driving to OTA from Gresham and Troutdale**, who *would* be impacted by the intersections studied. We are a public charter school with only bus hub service from Sandy. Therefore, most of our 240 students arrive via personal vehicles. Families driving in from outer areas would definitely be impacted by the closures and detours.

I am surprised that no intersections to the south were studied, as it is my understanding that trucks from the facility site will be traveling south to Eagle Creek to drop materials. **By not studying the south**, particularly intersections in Sandy that are already clogged in the morning by Sandy High School Traffic, **they left a gaping hole in the analysis.** The trucks will travel by most of Oregon Trail School District schools, save two, when travelling the southern route. **I do not think a decision regarding traffic impacts can be made in good faith until the impacts of intersections in Sandy are analyzed.**

Page 21: Schools

In agreement with Gresham Barlow School Board, I agree that by leaving it up to the Construction Managers and General Contractors to "take note of start and end times when developing delivery schedules" to "allot an additional 20 minutes... for school-related traffic to dissipate" is **nebulous and does not go far enough to ensure enforcement of such a rule.**

Schools across Gresham Barlow and Oregon Trail School District have varying open and end times. How would General Contractors be able to work around a large range such as 7:45am-9:05am (for the four schools listed in the study), as the "truck traffic is spread throughout the workday" (page 3) of "7:00 AM to 6:00 PM" (page 7).

Page 14 states that "traffic for local residences, local agricultural and other businesses, and emergency vehicles will still be allowed local access during full closures." School buses and parents' personal vehicles were not mentioned in this statement. Would students be able to get to school on time, and be given the courtesy the local residents would? Travel Exhibit 1.54

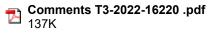
Demand Management strategies were mentioned (page 1) but in the Mitigations Appendix E, it was hard to understand what these strategies would be.

Lastly, Page. 4: Pavement Condition Index

Lastly, the analysis mentioned three roads in particular with low Pavement Condition Index scores. SE Altman Road was noted to be "narrow with unpaved shoulders and no pavement markings" and SE Carpenter Lane "is in poor condition with cracking and potholes" (page 4). While only two streets were highlighted, many of the roads in a two mile radius of Oregon Trail Academy are in poor condition: narrow, no shoulder, certainly no sidewalks, and potholes. If truck traffic was brought to this area, **the roads would crumble.** We do not have the infrastructure to support this amount of traffic.

Thank you kindly for reading my comments. I appreciate your time and attention to this important hearing. Sincerely, Emily Hafer, OTA Principal

(Also attached as a PDF on letterhead.)





OREGON TRAIL ACADEMY

An International Baccalaureate World School K-5 An Inquiry-Based Middle School 6-8



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