

# FODOR & ASSOCIATES<sup>LLC</sup>

Community  
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## Appeal Statement

Amazon Corner, TIA 16-007  
Submitted February 8, 2017

The proposed Amazon Corner development would be the largest development built in South Eugene in more than 30 years. At 122,000 square feet of floor area, with 108 residential units and 14,000 square feet of commercial space, this project will have an unprecedented traffic impact on the area. Since traffic in the area is already highly congested, this development would generate a critical mass of traffic pushing nearby intersections beyond capacity and causing traffic from main streets to overflow onto neighborhood streets, resulting in widespread traffic and safety problems.

Applicable rules include those for *Traffic Impact Analysis Review* found in **Eugene Code 9.8650 through 9.8680**, which invoke the "Standards for Traffic Impact Analyses" found in **Administrative Rule R-9.8650** (Administrative Order No. 58-02-02-F, Adoption of Standards for Traffic Impact Analyses).

Specific issues include the following:

- 1) Failure by the City Traffic Engineer and the Applicant to establish an adequately large scope, or study area, for the traffic impact analysis that captures and reflects the traffic impacts that a very large development like the proposed Amazon Corner would have, as required in the purpose statement for the *Traffic Impact Analysis Review* in **Eugene Code 9.8650**, which is directly referred to in the *Approval Criteria* in **EC 9.8680(1)** and is therefore a requirement. This is also a violation of **Administrative Rule R-9.8650-F(8)**, which lists the minimum transportation system that must be included in the TIA.
- 2) Failure to provide adequate baseline traffic data for existing conditions, including full-day hourly traffic counts (to accurately establish AM and PM peak periods) and AM peak traffic counts as required by the minimum

standards for the TIA established in **Administrative Rule Sections R-9.8650-F(4.1) and F(5)**.

- 3) Failure to evaluate the impacts of the proposed development during the AM peak traffic period, which is widely known to be an especially congested period in this area. Analysis and traffic counts for the morning peak periods are required by **Administrative Rule Section R-9.8650-F(5.1)**.
- 4) Failure to properly evaluate the contribution to AM peak traffic of trip generation from the 14,000 square feet of proposed commercial development. Applicant has claimed only "specialty retail" will locate at this development, whereas a wide range of commercial uses are possible. Applicant has made the arbitrary claim that this development will add zero trips to the AM peak without any factual evidence, as required in **Administrative Rule Section R-9.8650-F(6)**.
- 5) Failure to adequately evaluate the impacts of southbound trips from the proposed development, as well as the impacts of westbound and eastbound trips. Trips are merely allocated to the north and south directions on Hilyard and are not allocated to the east or west. Allocated trips are not evaluated in terms of their impacts on the next immediate intersection. A more-rigorous trip allocation should reasonably be required under **Administrative Rule Section R-9.8650-F(7) and -F(8)**.
- 6) Failure to adequately consider the spillover of traffic onto neighborhood residential streets that would result from this proposed development under increased traffic conditions, as required in **Eugene Code 9.8650 and Administrative Rule Section R-9.8650-F(7) and F(8)**.
- 7) Failure to address the obvious conflict between increased southbound left turns from Hilyard onto E 32nd and increased westbound left turns from E 32nd onto Hilyard that would occur under developed conditions, as noted in testimony from Friends of Eugene. The TIA has noted that current problems exist making left turns from 32<sup>nd</sup> onto Hilyard. This is the only route identified in the TIA for southbound trips from the proposed development. Therefore, this is a critical movement that must be analyzed in sufficient detail to establish safety and efficacy. Applicable rules include **Eugene Code 9.8650 and Administrative Rule Sections R-9.8650-F(8.1), -F(9), and -(10)**.

- 8) Failure to adequately recognize and evaluate pedestrian and bicycle traffic and safety, including the adjacent Amazon Bike Path, the nearby Alder Street Bike Route, and Safe Routes to School which uses E 32<sup>nd</sup> Avenue and borders the southern property line of the proposed development, as required in **Eugene Code 9.8650, EC 9.8670(2), and Administrative Rule Sections R-9.8650-F(10) and -G(2).**
  
- 9) Failure by the Applicant to propose, and by the City Traffic Engineer to require, adequate mitigation to protect and preserve the integrity of the transportation system, to maintain public safety, and to protect the quality of neighborhoods in the area by limiting excessive through traffic, as required in **Eugene Code 9.8650 and 9.8680(1) and Administrative Rule R-9.8650-F(9).**

For these reasons, we believe that the Applicant's TIA is inadequate and must be expanded in scope to address the issues identified herein and in testimony previously submitted into the record.

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