

Attention: Periodic Review Specialist  
Department of Land Conservation and Development  
635 Capitol Street NE, Suite 150  
Salem OR 97301

I am writing to raise objections to the Metro decision to add the Sherwood West Urban Reserve to the Urban Growth Boundary. Specifically, I object to the inclusion of the industrial designation on the north portion of the Sherwood West expansion. In addition, I object to the representation of Elwert Road as a “Residential Boulevard”. I also object to the depiction of an existing neighborhood as the pathway of a conceptual connector. Remedies to these objections would consist of removing the Sherwood West north subdistrict from the expansion proposal. In addition, the expansion proposal should accurately represent an expanded Elwert Road and remove any reference to a conceptual connector.

I am including several attachments which demonstrate my participation and prior written testimony throughout this process.

The development of the Sherwood West expansion plan undermined Goal 1, Citizen Involvement.

City communication to the local community about the Sherwood West north subdistrict has not been transparent. Mixed employment was the term emphasized throughout the Sherwood West Concept Plan public outreach. The emphasis on industrial use only really surfaced during the Metro presentations. The Sherwood West North subdistrict mixed employment boundaries were expanded after the Concept Plan’s public outreach was concluded. These meetings where the expansion and the term industrial use first surfaced were not open to public participation.

The communication around future transportation infrastructure during the Sherwood West Concept Plan public participation phase has been misleading. Elwert Road, a current north south connector between Yamhill County to the south and Washington County the north, is being pictured without a realistic representation of increased capacity to accommodate future growth. The city also represented that there was a potential to build an alternate route to Elwert Road despite evidence to the contrary. These characterizations throughout the public participation phase need to be taken in context of the community pushback in 2017 which lead to the city withdrawing their request for Urban Growth Boundary expansion. The impact of characterizing Elwert Road as a “Residential Boulevard” and displaying unrealistic future by-passes is that this communication, rather than fostering an informed public, is accomplishing propaganda goals.

The proposed industrial designation on the North portion of the Sherwood West expansion area violates Goal 6, Air, Water, and Land Resources Quality and Goal 5, Natural Resources, Scenic and Historic Areas, and Open Spaces. The designated area is adjacent to the Tualatin River National Wildlife Refuge, overlaps with protected upland habitat and is

near a protected waterway, chicken creek. Furthermore, this industrial area will be a new intrusion into an area that is currently farmland with no adjacent industrial use. In fact, it is a relatively small parcel, bisected by major electrical transmission lines, with the only potential to grow in size being incorporating additional farmland.

The Sherwood Est expansion plan violates Goal 12, Transportation.

The rerouting of Elwert Road violates this goal by not utilizing existing right of way and failing to plan for growth of that road's capacity. The plan also represents a conceptual route which threatens existing urban social units, the Eastview Road Neighborhood. Sherwood should have at least made a good faith effort at high level planning which addresses realistic steps to accommodate future growth.

Thank you for your consideration of these objections.

Sincerely,

Brian Fields

Secretary Eastview Road Neighborhood Association

My name is Brian Fields. I am a member of the Eastview Road Neighborhood (ERNA), and I am submitting my comments on behalf of ERNA.

ERNA objects to the continued inclusions of images portraying a potential north south connector through our neighborhood. The path of this connector, depicted in the June 2023 Sherwood West Concept Plan Draft packet is not viable, feasible, or suited for its intended use. We have stressed these concerns repeatedly at Sherwood West Concept Plan Advisory Committee meetings. Overall, we have emphasized the steep grades of the terrain, which makes the proposal cost prohibited and destructive. In addition, the City's external traffic expert, Carl Springer, confirmed that the proposed north south connector was not a solution for truck traffic or regional commuter traffic, despite the proposed Elwert-Edy road realignment. Therefore, we request the removal of any graphic representation of a connector running down Eastview Road from the proposed plan. I am attaching prior comments addressing these concerns, made on behalf of our Association for the November 17<sup>th</sup> CAC meeting. These comments also address the attached November 4 City of Sherwood Memo titled "Alignment/Grade Analysis of N-S Road, which contains a faulty engineering analysis."

ERNA insists these representations cease. The following references are included in the packet.

- Sherwood West Concept Plan, Draft June 2023.
  - Page 38 show the connector pictured as an ellipse centered around Eastview Road.
  - Page 56, figure 21 pictures the connector through Eastview Road.
  - Appendix J, Pages 2-4, the path of the proposed connector is pictured as a conceptual street.
  - Appendix J, page 14 has neon pink shading centered on Eastview Road and uses a giant label stating CONCEPTUAL NORTH SOUTH CONNECTOR.
  - Appendix L, page 3 shows the connector pictured as an ellipse centered around Eastview Road.

For the reasons stated above, we believe that engineering feasibility studies must occur before depicting the path of the connector as represented in the meeting materials. The images presented at this point have no purpose other than an intentionally deployed propaganda tool for representing a potential traffic solution that does not in fact exist.

Brian Fields,  
Member of Eastview Road Neighborhood Association

**Public Comments for November 17<sup>th</sup>, 2022, CAC and TAC meetings on behalf of the Eastview Road Neighborhood Association.**

My name is Brian Fields, and I am submitting these comments on behalf of the Eastview Road Neighborhood Association. Our Association is in opposition to the proposed North-South truck by-pass on the western edge of the Sherwood West UGB. Specifically, I am commenting on the feasibility rational submitted in the November 4, 2022, memo from Bob Galati to Erika Palmer, which was included in the November 17, 2022, CAC meeting packet.

This memo does not demonstrate the feasibility of this proposed by-pass. It is instead an abstract engineering exercise, which cherry picks the impacts that are acknowledged and ignores the impacts which don't support its conclusion.

The rational for not improving Elwert is never made. Although a few weak and misleading shortcomings of the current Elwert Road alignment are mentioned.

- Mr. Galati simply affirms that increased truck traffic on Elwert road is “counter to citizen opinion of appropriate traffic usage”.
- Mr. Galati describes a few negative characteristics of Elwert Road in its current state.
  - Poor vertical sight distance in some areas.
  - Poor intersection sight distance issues.
- Furthermore, his comments go into a fair level of detail in describing the local connectors to Elwert, which I suppose is some sort of implied statement about the complications in improving Elwert Road.

Mr. Galati neglects to mention any of the obvious advantages Elwert Road offers as a candidate for improvement over other options.

- Mr. Galati does not acknowledge that for almost all the run of Elwert Road, between Hwy 99 and Scholl's Sherwood Road there is vacant land on either the west or east side of Elwert road that would allow for road expansion without impacting existing homes.
- Mr. Galati does not address that the neighborhoods built on the east side of Elwert were built during the current traffic patterns on Elwert Road, as a by-pass between Hwy 99W and Scholl's-Sherwood Road. The homeowners in these neighborhoods bought their homes under the current traffic flow on Elwert Road.
- The current physical limitations would require much smaller engineering project to remedy than the fantastical scheme Mr. Galati proposes in his memo.

Mr. Galati omits any acknowledgement of the severe impacts on the Eastview Road neighborhood. In fact, Mr. Galati avoids any mention that there is an existing neighborhood which his proposed truck route goes through.

- Mr. Galati's memo contains no description of the existing neighborhood on Eastview Road.
- The map included in Mr. Galati's memo, showing the North-South 3 Lane Arterial shows all the structures near Elwert Road and none of the existing homes on Eastview Road or Edy Road.

- Mr. Galati characterizes the proposed truck route as “impact(ing) the fewest number of structures.”
- In fact, a careful review of Mr. Galati’s plan shows that 9 houses would end up being removed and 4 houses in the Rural Reserve would lose access to Eastview Road.
- Mr. Galati does not acknowledge that the intersection of Edy and Eastview Road is a dangerous S-Curve with some of the highest rate of accident occurrences in Washington County.
- Mr. Galati does not acknowledge the environmental damage that can be expected with a project that lays down 76,000 Cubic Feet of fill near Chicken Creek.

The assertions I am making can be directly obtained by reviewing the implications of Mr. Galati’s Road Alignment Analysis on page 41 of the CAC Meeting #11 Packet.

- The proposal to add enough fill over the course of Eastview Road to change a 12% slope to a 7.5% slope would have a devastating impact on the neighborhood. The amount of fill necessary to accomplish this is extraordinary. The volume would be 76,000 cubic yards or 7,600 dump truck loads. This would be 21 dump trucks a day for a year to deliver this volume of fill.
- The project would involve construction of a new 450-foot-long bridge over Chicken Creek.
- The project will require a 150 foot right of way to accommodate 3 lanes of traffic, two sidewalks, 2 guardrails, fill slopes and two fences at the toe of both fills.
- The impacts of the bridge, road elevation described, and necessary right of way, would wipe out 9 houses.
  - Several homes on the east side of Eastview Road are less than 150 feet from the western side of the right of way.
  - Due to the width of the right of way for this volume of fill, 5 homes would be in the direct path of the right of way.
  - Two additional homes would have their access cut off and have a three-lane truck route on their doorsteps, and 40 feet above them.
  - One home would be removed to improve the dangerous Edy-Eastview intersection.
  - One home, which is on the west side of Eastview Road in the Rural Reserve, would be removed by bridge construction.
- In addition, raising the elevation of Eastview Road would eliminate access to 4 homes in the rural reserve to the west of Eastview Road.

I would like to point out that this feasibility memo is not a good faith effort to advocate a policy position. Mr. Galati’s memo simply asserts a position about citizen views on the appropriate traffic usage. Even if the statement is accurate and backed up by data, such as un-biased polling of a representative sample, public sentiment on one issue alone cannot forestall weighing all options for an extraordinarily expensive and destructive public project. In addition, Mr. Galati’s implied complications for Elwert Road improvement pale in comparison to the magnitude of expense and destruction that his truck route proposal would cause. Mr. Galati fails to acknowledge any impact to an existing neighborhood. He does this by excluding any

mention of our neighborhood in his narrative. In addition, he appears to have penciled out any visual representation of the houses in our neighborhood and all the houses on Edy Road. I am outraged by this ham-fisted attempt to justify an unsupportable position.

I urge all members of the CAC to reject this North-South 3 lane truck by-pass proposal. I urge members of the TAC to weigh in and reject this impractical proposal.

Sincerely,  
Brian Fields  
Secretary, Eastview Road Neighborhood Association

Sherwood UGB expansion comments,  
Brian Fields  
Secretary, Eastview Road Neighborhood Association

I urge the Metro Council to scale back the Sherwood West Urban Growth expansion. We do not have the transportation infrastructure to support this growth. In addition, the City of Sherwood has not done any planning, not even “conceptual”, to expand the capacity of Elwert Road, the only viable north south connector.

The current plans for Elwert Road are inadequate for the future growth planned.

Elwert road is serving as a regional connector. Even without bringing in additional land in the Sherwood West Urban Reserve we can expect the traffic flow to increase. With the addition of large amounts of new housing the burden on the existing road will only increase. How has Sherwood planned for increased capacity? They have not.

The Sherwood West concept plan shows the vision that Elwert road remain one lane in either direction with the addition of turn lanes. The city has repeatedly said that their vision of Elwert is that of a neighborhood street. This flies in the face of the current reality of an already overburdened regional connector, let alone showing any sense of planning for the future to accommodate a greatly increased local population. The only mention in the Sherwood West concept plan of planning for future connectivity is vague mentions of conceptual connectors. You can reference the “Transportation and Infrastructure” Section on page 101 of part 1 of the Sherwood UGB expansion proposal.

“North-South Connectivity – The concept of adding a route to enhance regional north-south connectivity will require future study. Additional feasibility and cost analysis will be

necessary. This should be considered as a long-term strategy, rather than an essential component of early stage transportation planning in Sherwood West.”

But the truth is that the Sherwood West topography is not going to allow any new north south connectors. During the public outreach portion of the Sherwood West concept plan much feedback was provided to the city outlining specific complications for a north south connector west of Elwert Road. The City’s own traffic modelling demonstrated that regional traffic could not be diverted from Elwert Road to any significant degree. The land is riddled with steep slopes and is bisected by Chicken Creek. In addition, the border of Sherwood West veers sharply east when you go north of Edy Road. If this hypothetical connector were built, as it moved north it would run into Rural Reserve land. Due to this a connection to Scholl’s Sherwood Road to the north could not be completed. This means any road that was built would have to feed back onto Edy and Elwert, the existing transportation corridor.

There really is no choice but to improve the existing transportation corridor, but the City of Sherwood’s West Concept plan does the opposite. Sherwood is proposing to move portions Elwert Road off it’s current north south alignment and meander to the west, pass through two round-abouts, incur a new Chicken Creek crossing and then meander back to the Elwert Road current alignment in the north.

We have examples in the nearby region of what successful road planning would look like. The massive development to the north of Sherwood West, on Roy Rogers Road, has been accompanied by expansion of that road to 4 lanes. If you want to see aesthetically pleasing road expansion, we need only look to the improvements Lake Oswego has done on Boones Ferry Road. The road was both

improved to 4 lanes with a turn lane, but also includes attractive landscaped dividers and sidewalks. This is much like Sherwood has proposed, but with a critical difference, Lake Oswego recognized the need to increase capacity while making attractiveness an important part of their road design. Both can be done.

To be clear my point is not that Sherwood has not already solved the capacity problem prior to asking for an Urban Growth Boundary expansion. The problem is that Sherwood is not even planning for increased capacity. In fact, their public statements during the West Concept Plan outreach process indicated they want to discourage regional traffic and keep Elwert as a neighborhood street. See the description on page 227 of the submittal, in the Section title “SW Elwert Road Design Concept”. Make note that the designation for much of Elwert Road is “Residential Boulevard”. There is much risk if Sherwood doubles down on this approach that near term development will forestall any future capacity improvements on Elwert Road.

Their proposal to bring in the entire Sherwood West Urban reserve should be scaled way back until the City actually provides realistic transportation planning. Bringing the entire 1200 acres of Sherwood West now into the UGB is only going to compound a local and regional transportation quagmire which already exists. Sherwood needs to confront the reality that topography and the Urban Reserve boundaries themselves prevent any alternate north south connector. I encourage Metro to not approve Sherwood’s ask to bring in the entire Sherwood West Urban Growth Reserve into the Urban Growth boundary.

Brian Fields  
Resident of Sherwood West



**Date:** November 4, 2022  
**Project:** Sherwood West Concept Planning  
**To:** Erika Palmer, Planning Manager  
**From:** Bob Galati P.E., City Engineer  
**Topic:** Alignment/Grade Analysis of N-S Road

The proposed North-South 2 to 3 lane arterial alignment option along the west side of the Sherwood West UGB has received comments regarding feasibility of the alignment and the nature of the existing terrain. This analysis is to provide a technical analysis of the existing topographic conditions, and provide the rationale that a horizontal and vertical alignment is feasible.

#### Background

Elwert Road from Highway 99W to Scholls-Sherwood Road is currently functioning as a two lane rural arterial. Elwert Road historically was a rural road used primarily for providing transportation access for farm equipment and rural residents. Over time, Elwert Road has become a secondary bypass route for commuter traffic (through trips) traveling between Highway 99W and Scholls-Sherwood Road and Roy Rogers Road, avoiding the intersection signals along the Highway 99W route.

Elwert Road's physical characteristics consist of two 11-foot paved lanes, a straight horizontal alignment, and a vertical alignment consisting of rolling hills that include acute vertical sags and crests which result in poor vertical sight distances, and intersection sight distance issues. Access points onto Elwert Road include several private driveways and seven street intersections (both local and collector). The intersecting streets and their classifications are listed below.

- Kruger Road – Local
- Orchard Hill Road – Local
- Edy Road – Collector
- Schroeder Road – Local
- Haide Road – Local
- Handley Road – Collector
- Conzelmann Road – Local
- Lebeau Road - Local

The City of Sherwood's Transportation System Plan (COS TSP) and Washington County's Transportation System Plan (WACO TSP) coordinated the analysis and results for Elwert Road from the intersection of Highway 99W to the Scholls-Sherwood Road intersection.

Both WACO's and COS's TSP's identify the future build-out condition of Elwert Road as a 3-lane arterial which will include sidewalks and bike lanes on both sides of the road. Appropriately sized arterial roads will allow through trips to remain on the arterial system and discourage use of local streets for cut-through traffic routes.

However, it is identified that the Elwert Road upgrade would also increase the amount of truck traffic, which is counter to citizen opinion of appropriate traffic usage.

The proposed addition of the North-South 2 to 3-lane arterial road alignment along the western edge of the City's UGB, is seen as an option for providing an alternative route for truck traffic, which would still be within the City's UGB limits.

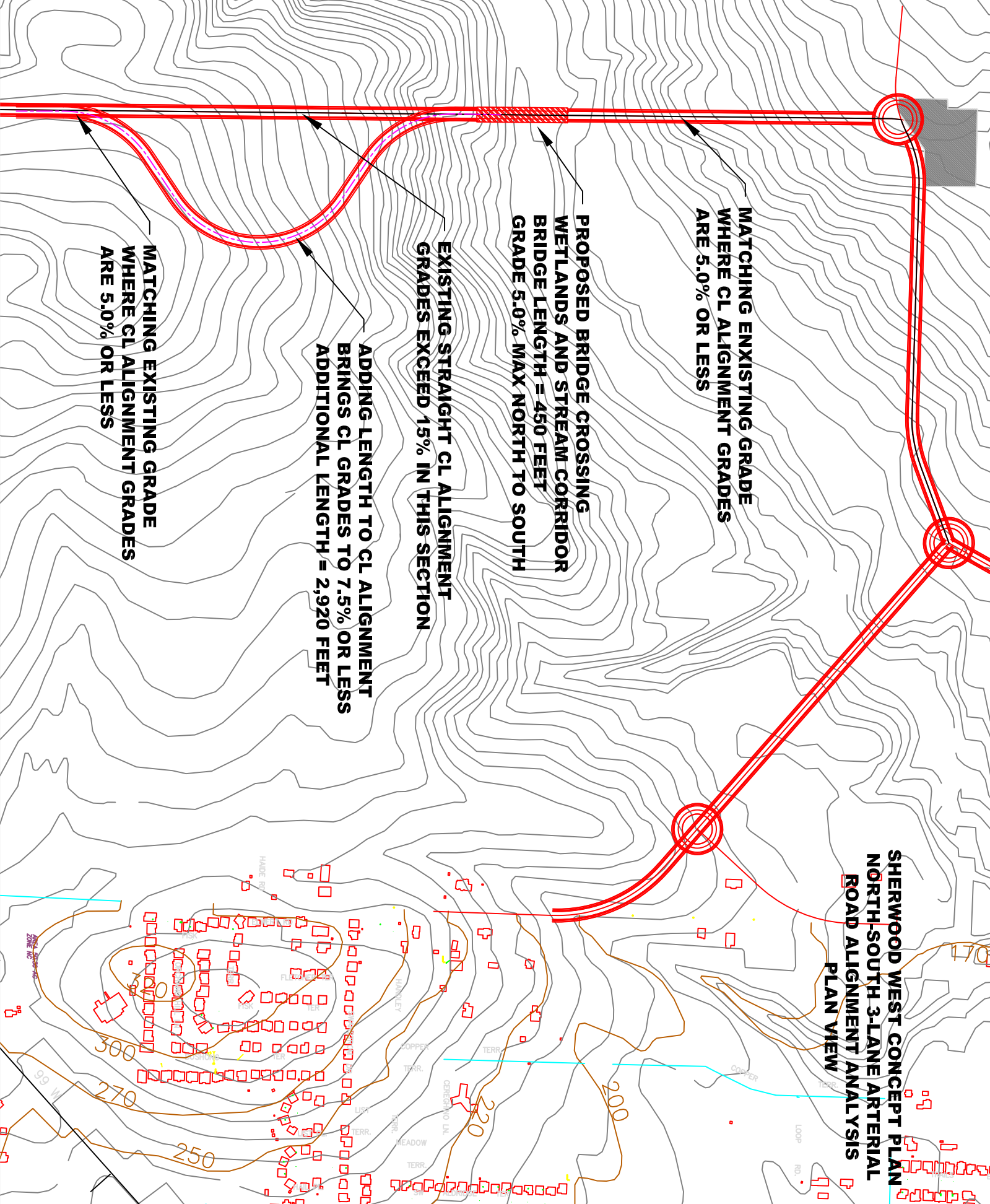
#### Alignment Description

The proposed alignment would see the extension of the existing SW Eastview Road to the south and eventually connecting to SW Chapman Road, which would then connect to Hwy 99W. The proposed alignment appears to be feasible for the following reasons:

- 1) The alignment tends to follow existing property lines along the majority of its extents and impacts the fewest number of structures.
- 2) The grades along the majority of the alignment's length are within the 5 to 10 percent roadway design gradient desired.
- 3) The crossing of the Chicken Creek wetlands and stream corridor can be accomplished via the use of a bridge span.
- 4) The gradient just south of the Chicken Creek crossing is where the steepest topographic grades occur along the length of the alignment. The grades in this section are 15% and greater for a distance of approximately 500 feet. The option here is to deviate the alignment by extending the length of the alignment, as shown on the attached exhibits, so as to allow roadway grades of around 7% to be used, after which the alignment returns to the original north-south alignment direction.

#### Conclusion

The proposed alignment option is technically feasible and may become a desirable option to direct truck traffic away from the proposed Elwert Road alignment option and upgrade.



**SHERWOOD WEST CONCEPT PLAN  
NORTH-SOUTH 3-LANE ARTERIAL  
ROAD ALIGNMENT ANALYSIS  
PLAN VIEW**

**MATCHING EXISTING GRADE  
WHERE CL ALIGNMENT GRADES  
ARE 5.0% OR LESS**

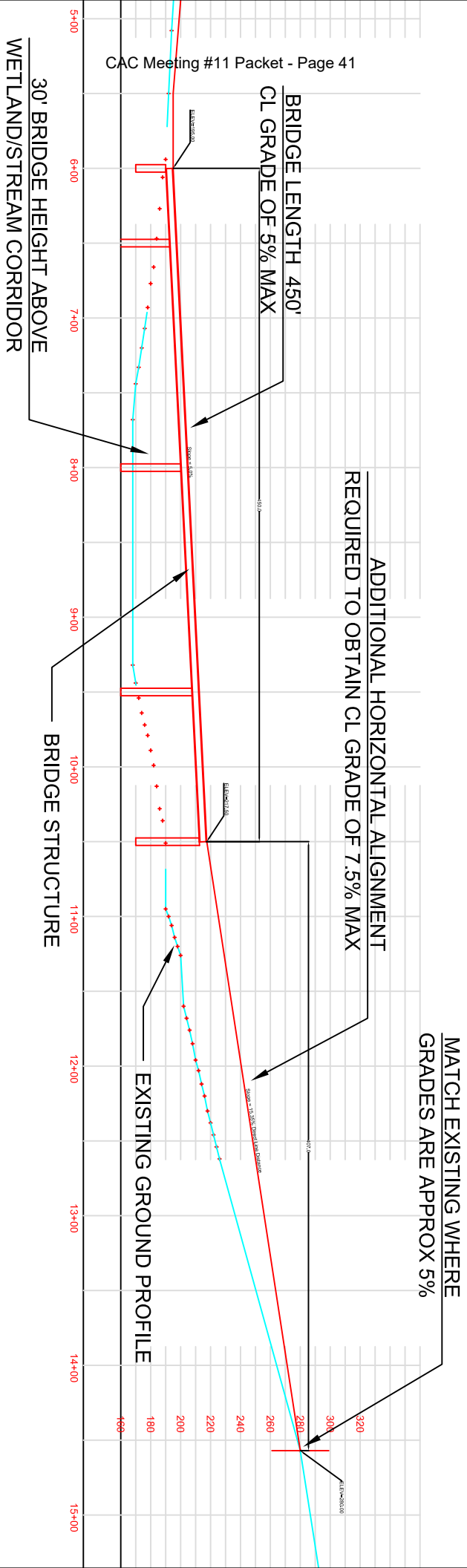
**PROPOSED BRIDGE CROSSING  
WETLANDS AND STREAM CORRIDOR  
BRIDGE LENGTH = 450 FEET  
GRADE 5.0% MAX NORTH TO SOUTH**

**EXISTING STRAIGHT CL ALIGNMENT  
GRADES EXCEED 15% IN THIS SECTION**

**ADDING LENGTH TO CL ALIGNMENT  
BRINGS CL GRADES TO 7.5% OR LESS  
ADDITIONAL LENGTH = 2,920 FEET**

**MATCHING EXISTING GRADE  
WHERE CL ALIGNMENT GRADES  
ARE 5.0% OR LESS**

SHERWOOD WEST CONCEPT PLAN  
NORTH-SOUTH 3-LANE ARTERIAL  
ROAD ALIGNMENT ANALYSIS  
WETLAND/STREAM CORRIDOR  
BRIDGE PROFILE



Sherwood UGB expansion comments,  
Brian Fields  
Secretary, Eastview Road Neighborhood Association

I urge the Metro Council to scale back the Sherwood West Urban Growth expansion. I have two primary objections. The scale of residential development is getting too far ahead of the regional transportation capacity. Secondly the proposed industrial zoning is inappropriate and impractical.

**I oppose industrial use in the Sherwood West North subdistrict.**

The location is inappropriate for industrial use. It is sandwiched between the Tualatin River National Wildlife Refuge to the east and farmland to the north and west. In addition, a significant portion of the area overlays protected Title 13 upland habitat. If for no other reasons the impacts on the environment, farming and forestry are contrary to Oregon's Land Use Goals.

In addition, this area is bisected by BPA transmission lines. This fact is a limit on what can be allowed to be built. Also, major electrical transmission lines such as these can have a negative impact on sensitive electronic manufacturing. The range of potential industrial uses will be further limited by this.

Furthermore, City communication to the local community has not been transparent. Mixed employment was the term emphasized throughout the Sherwood West Concept Plan public outreach. The emphasis on industrial use only really surfaced during the Metro presentations. The Sherwood West North subdistrict mixed employment boundaries were expanded after the Concept Plan's

public outreach was concluded. The meetings where the expansion and the term industrial use first surfaced were not open to public participation.

Having participated throughout the Sherwood West Concept Plan I have to take issue with the representations by the City representatives, at your June 24 meeting, where they made representations of Sherwood residents' awareness and approval of industrial siting in this location.

**Sherwood does not have the transportation infrastructure to support this scale of residential development.**

The current plans for Elwert Road are inadequate for the future growth planned. In addition, the City of Sherwood has not done any high-level planning to expand the capacity of Elwert Road, the only viable north south connector. Instead, the City of Sherwood proposals will reduce Elwert Roads effectiveness as a north south connector. This will only compound the existing problems of the existing neighborhoods connecting to Highway 99 to the south of Elwert road and Highway 99.

The Sherwood West concept plan portrays the vision that Elwert Road remain one lane in either direction with the addition of turn lanes. The city has repeatedly said that their vision of Elwert is that of a neighborhood street. This flies in the face of the current reality of an already overburdened regional connector, let alone showing any sense of planning for the future to accommodate a greatly increased local population. The only mention in the Sherwood West concept plan of planning for future connectivity is vague mentions of conceptual connectors. You can reference the "Transportation

and Infrastructure” Section on page 101 of part 1 of the Sherwood UGB expansion proposal.

“North-South Connectivity – The concept of adding a route to enhance regional north-south connectivity will require future study. Additional feasibility and cost analysis will be necessary. This should be considered as a long-term strategy, rather than an essential component of early stage transportation planning in Sherwood West.”

Local taxpayers cannot afford to pay for a north south connector. It is also clear that neither County, State, or Federal money cannot be expected to build a new north south connector. The hard fact is that the Sherwood West topography is not going to allow any new north south connectors without massive engineering and expenditures.

During the public outreach portion of the Sherwood West concept plan our neighborhood association provided feedback City outlining specific complications for a north south connector west of Elwert Road. The City’s commissioned its own traffic modelling. The public testimony provided by the commissioned traffic engineer characterized the expected as neighborhood collector scale, not arterial scale.

The land is riddled with steep slopes and is bisected by Chicken Creek. In addition, the border of Sherwood West veers sharply east when you go north of Edy Road. If this hypothetical connector were built, as it moved north it would run into Rural Reserve land. Due to this a connection to Scholl’s Sherwood Road to the north could not be completed. This means any road that was built would have to feed back onto Edy and Elwert, the existing transportation corridor.

There really is no choice but to improve the existing transportation corridor, but the City of Sherwood’s West Concept plan does the

opposite. Sherwood is proposing to move portions Elwert Road from it's current north south alignment and meander to the west, pass through two round-abouts, incur a new Chicken Creek crossing and then meander back to the Elwert Road current alignment in the north.

To be clear my point is not that Sherwood has not already solved the traffic capacity problem prior to asking for an Urban Growth Boundary expansion. The problem is that Sherwood is not even planning for increased capacity. In fact, their public statements during the Sherwood West Concept Plan outreach process indicated they want to discourage regional traffic and keep Elwert as a neighborhood street. See the description on page 227 of the submittal, in the Section title "SW Elwert Road Design Concept". Make note that the designation for much of Elwert Road is "Residential Boulevard". If Sherwood continues to doubles down on this approach near, term development will forestall any future capacity improvements on Elwert Road.

I request the Metro Council not approve the entire Sherwood West Urban Reserve being brought into Urban Growth Boundary. The scale of residential development should be reduced.

The City of Sherwood proposal to create an industrial zone in an environmentally sensitive area adjacent to farmland and forestry should be removed from this proposal.

Brian Fields  
Resident of Sherwood West