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EXHIBIT 1

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FILE #: APP 2016-0004  
FILE NAME: Loftis appeal of SW 75 Terrace decision  
TYPE: APP RECEIVED BY: \_\_\_\_\_  
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SUBMITTED: 11/28/16 NAC: West Slope

APPEAL OF A LAND USE DECISION

Revised 01/2016

PLEASE SELECT THE SPECIFIC TYPE OF APPEAL FROM THE FOLLOWING LIST:

- APPEAL OF A TYPE 1 DECISION
- APPEAL OF A TYPE 2 DECISION
- APPEAL OF A TYPE 3 DECISION
- OTHER

APPELLANT NAME(S):

JEANNE F. LOFTIS  
BLAIR T. LOFTIS

SIGNATURE(S); (Original Signature(s) Required)

Jeanne Loftis  
Blair Loftis

EACH APPELLANT MUST HAVE PROVIDED EVIDENCE TO THE DECISION MAKING AUTHORITY THAT WAS CONTRARY TO THE DECISION.

**APPELLANT REPRESENTATIVE:** All pre-hearing contact will be made solely to this person.  
IF MORE THAN ONE APPELLANT, APPELLANTS MUST DESIGNATE A SINGLE APPELLANT REPRESENTATIVE.

NAME: JEANNE F. LOFTIS COMPANY: BULLNANT HOUSER BAILEY  
ADDRESS: 888 SW 5TH AVE. SUITE 300  
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PHONE: 503-499-4601 FAX: \_\_\_\_\_  
SIGNATURE: Jeanne Loftis (Original Signature Required)

REQUIRED INFORMATION

SITE ADDRESS: SW 75TH TERRACE SUBDIVISION CASE FILE NO. UNDER APPEAL: LD2016-0017 / TP2016-0010 / SM 2016-0008  
SPECIFIC APPROVAL CRITERIA / CONDITION BEING APPEALED: \_\_\_\_\_  
DEDICATED RIGHT-OF-WAY CONNECTING SW 75TH TERRACE TO SW CANYON LANE  
SPECIFIC REASON(S) WHY A FINDING / CONDITION IS IN ERROR AS A MATTER OF FACT, LAW OR BOTH: \_\_\_\_\_  
SEE ATTACHED (Attach additional sheets if necessary)  
SPECIFIC EVIDENCE RELIED ON TO ALLEGE ERROR: SEE ATTACHED (Attach additional sheets if necessary)  
HOW DID THE APPELLANT(S) PROVIDE EVIDENCE TO THE DECISION-MAKING AUTHORITY? WHERE IN THE OFFICIAL RECORD IS SUCH EVIDENCE?: SEE ATTACHED (Attach additional sheets if necessary)

**SUBJECT: APPEAL OF LAND USE DECISION – TYPE 26**

**CASE FILE: LD2016-0017 / TP2016-0010 / SDM2016-0008**

**Specific Approval Criteria / Condition Being Appealed:**

- **Dedicated right-of-way (ROW) connecting SW 75<sup>th</sup> Terrace to SW Canyon Lane** as recommended under Transportation, page FR-2 of the Facilities Review Committee Technical Review and Recommendations, SW 75<sup>th</sup> Terrace Subdivision, LD2016-0017 / TP2016-0011 / SDM2016-008., dated November 16, 2016 (Facilities Committee TRR)

**Specific Reason(s) Why a Finding/Condition is in Error as a Matter of Fact, Law, or Both:**

- **The analysis of traffic impact does not adequately address anticipated traffic volume for new trips** (pages FR-4 and FR-5 of the Facilities Committee TRR).
- **The analysis does not address the potential for cut-through traffic.**
- **Lacking an adequate analysis the Facilities Committee is jeopardizing authorizing traffic facilities which would be in conflict with Chapter 6.2 – Transportation Goals and Policies as addressed in Beaverton’s Comprehensive Plan.** Namely; Section 6.2.1 (Goal) which states that transportation facilities shall be designed and constructed in a manner to enhance Beaverton’s livability and subsection (e) which protects neighborhoods from excessive through traffic.
- **Safety review and calming measures are not adequate.**

**Specific Evidence Relied on to Allege Error:**

- **A traffic analysis was performed by AKS Engineering, dated July 29, 2016.** As the analysis was performed during the summer it did not include traffic volume associated with West Sylvan Middle School when school is in session and school-related activities after the school day (September through June). As referenced in multiple letters from the affected neighborhood our concern is with increased traffic volume, and specifically cut-through traffic, which is expected with school-related activities.
- As the data from the summertime traffic analysis would likely underestimate the volume of new trips and cut through traffic we object to the review that the increased traffic would have an insignificant impact upon neighborhood safety. This is especially true as the residents of SW 75<sup>th</sup> represent a diverse population mix including children, elderly, and two persons with developmental disabilities.

**How Did the Appellant(s) Provide Evidence to the Decision-Making Authority? Where in the Official Record is Such Evidence?:**

- Staff Report, Exhibit 3. Public Comment (Exhibit 3.1, 3.2, 3.3, 3.4)