



EXHIBIT 29.3 TESTIMONY

WASHINGTON COUNTY

OREGON

October 2, 2024

City of Beaverton Planning Commission
c/o Rob Zoeller
PO Box 4755
Beaverton, OR 97076

RE: Street connectivity concerns with Cooper Mountain Community Plan

Project Name: COOPER MOUNTAIN COMMUNITY PLAN

Case File Numbers: LU42024-00682, CPMA42024-00679, TA42024-00680, ZMA42024-00681

Dear Planning Commission members,

Thank you for the opportunity to provide testimony on the draft Cooper Mountain Community Plan. Washington County staff have participated on the technical advisory committee throughout the planning process. The draft Cooper Mountain Community Plan shows a vision for a robust community-focused place with walkable streets, lively commercial areas and a coordinated system of parks and trails. However, County staff have been, and remain concerned about an important multimodal transportation connectivity gap in this plan to ensure a complete and connected community.

Washington County staff do not support the Cooper Mountain Community Plan as proposed because it does not meet standards for safety and connectivity without an internal collector street connection to Grabhorn Road.

The city's preferred concept plan does not include all of the needed transportation infrastructure to adequately serve future development within and around the Cooper Mountain area. More specifically, the preferred concept leaves out a multimodal collector street that would provide an internal vehicular connection (including school buses, emergency vehicles and transit) between the Cooper Mountain and South Cooper Mountain areas and Grabhorn Road. This collector street was included in multiple prior city, county and regional planning efforts, including the South Cooper Mountain Concept Plan (acknowledged in 2015), South Cooper Mountain Community Plan (adopted in 2015), the City of Beaverton proposal to Metro to expand the urban growth boundary to include the Cooper Mountain Urban Reserve (2018), the 2018 Metro Urban Growth Report, and the Washington County Urban Reserves Transportation Study (2021).

The South Cooper Mountain Community Plan contains a policy specifically addressing the need for the proposed collector connection all the way from Tigard's River Terrace area (Urban Reserve 6C) to Grabhorn Road:

*The alignment of the North-South Collector shall account for, and not preclude, future extension to the west to SW Grabhorn Road and south to serve Urban Reserve 6C.”
(SCMCP Street Policies)*

The city’s proposal to Metro to expand the urban growth boundary to include the Cooper Mountain Urban Reserve (2018) also addresses the need for a holistic look at the area and the need for north-south transportation routes:

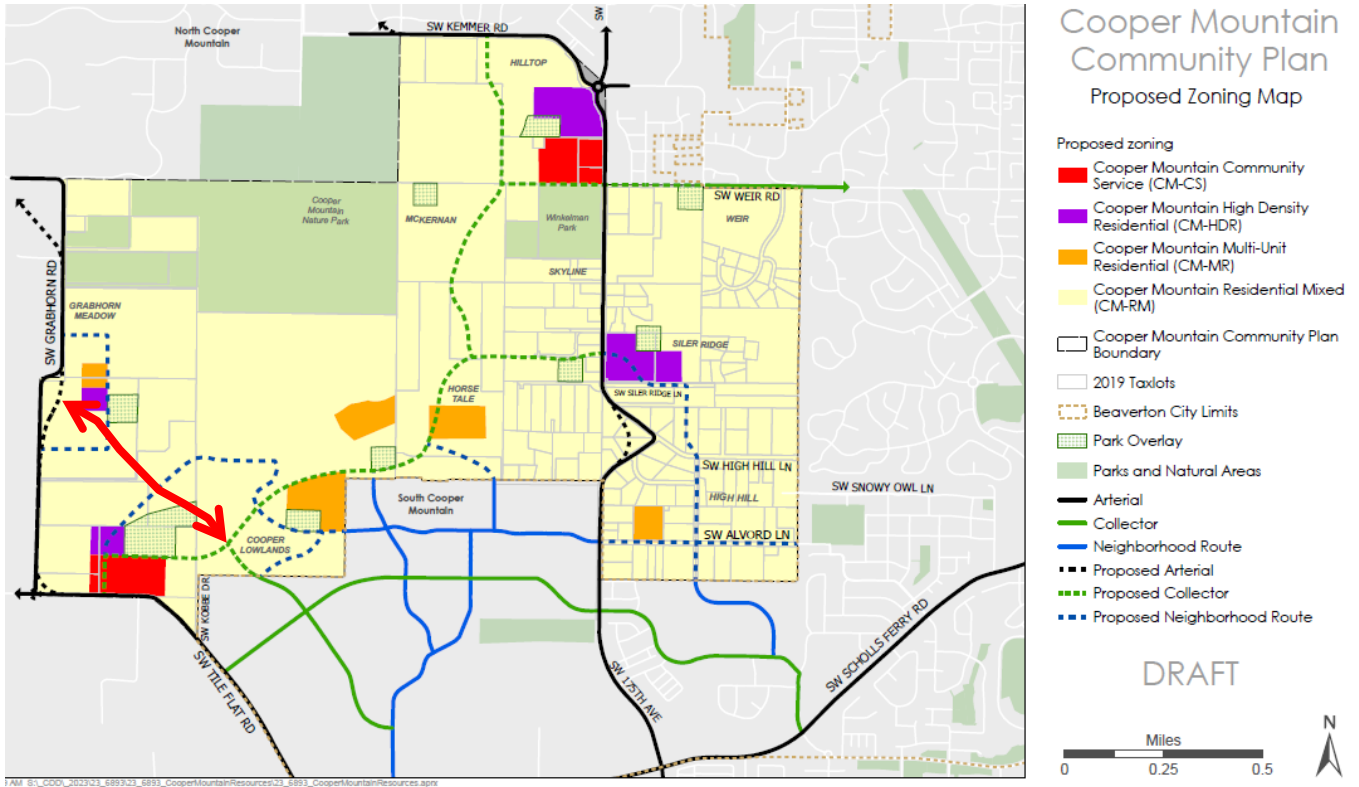
“The city’s urban growth boundary expansion proposal is based on the South Cooper Mountain Concept Plan, a City Council-approved concept plan consistent with Title 11 of Metro’s Urban Growth Management Functional Plan (Appendices F, G and H) ... At Metro’s request, Beaverton led the concept planning for all three areas to consider holistically transportation, infrastructure, natural resources, and new development ... Adding the urban reserve to the UGB helps Washington County and Beaverton upgrade rural transportation infrastructure and close gaps in the road network. Without the urban reserve, the road, bike and pedestrian networks remain constrained, especially for north-south routes.”

County arterial streets are being strained by increasing vehicle traffic associated with urban development. In most cases, county arterial streets on the edge of urbanizing areas are not designed or built for urban-level traffic. This is especially true for Cooper Mountain, which is bordered by two County arterial streets—Tile Flat Road and Grabhorn Road—and bisected by another—SW 175th Avenue. In this and in every other urbanizing area, we rely upon cities to provide connected collector-level streets to facilitate internal trips for all modes within new communities and connect to appropriate locations on the arterial streets. These internal collectors provide safer and more direct multimodal connections for traffic through the new neighborhoods and to commercial amenities.

Most concerning, the city’s current plan includes a disconnected neighborhood (Grabhorn Meadows) on the west side of the urban area that would only have access directly to Grabhorn Road. This would require all vehicle travel trips beginning or ending in Grabhorn Meadows, even trips to destinations within the Cooper Mountain/South Cooper Mountain area, to travel on the adjacent heavily traveled county arterial streets, Grabhorn Road and Tile Flat Road, to access nearby commercial amenities and the rest of the urban area. The Grabhorn Meadows neighborhood is proposed to have a mix of zoning which includes Residential Mixed, Multi-Unit Residential, and High-Density Residential uses.

As noted, the current proposal is inconsistent with prior city planning. The following maps show the city’s Proposed Zoning Map with the approximate location of the requested collector connection shown, a Cooper Mountain Draft Transportation Concepts map (2021), a map of the Concept Plan Land Use Framework (2018) and the South Cooper Mountain Concept Plan Transportation Framework Map (2014) with the collector connection.

COOPER MOUNTAIN COMMUNITY PLAN PROPOSED ZONING MAP (2024)



COOPER MOUNTAIN COMMUNITY PLAN DRAFT TRANSPORTATION CONCEPTS (2021)

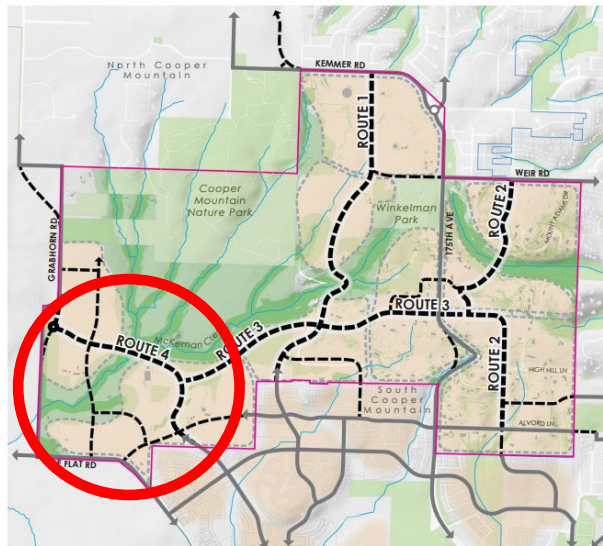
PLANNING FOR FUTURE TRANSPORTATION CONNECTIONS

Where should new transportation corridors be planned to create a connected community?

This map shows four potential transportation corridors and how they might connect future neighborhoods and the area's street network:

- Route 1** connects the Hilltop area to South Cooper Mountain and provides an alternative to SW 175th Avenue for local north-south trips.
- Route 2** connects the eastern neighborhoods. This route has significant challenges due to topography and existing development.
- Route 3** provides east-west connectivity between SW 175th and the western neighborhoods, with connections to Tile Flat Road and Grabhorn Road.
- Route 4** connects South Cooper Mountain, the Cooper Lowlands, and Grabhorn Meadow, ending at a new intersection along Grabhorn Road.

What questions do you have about this map?



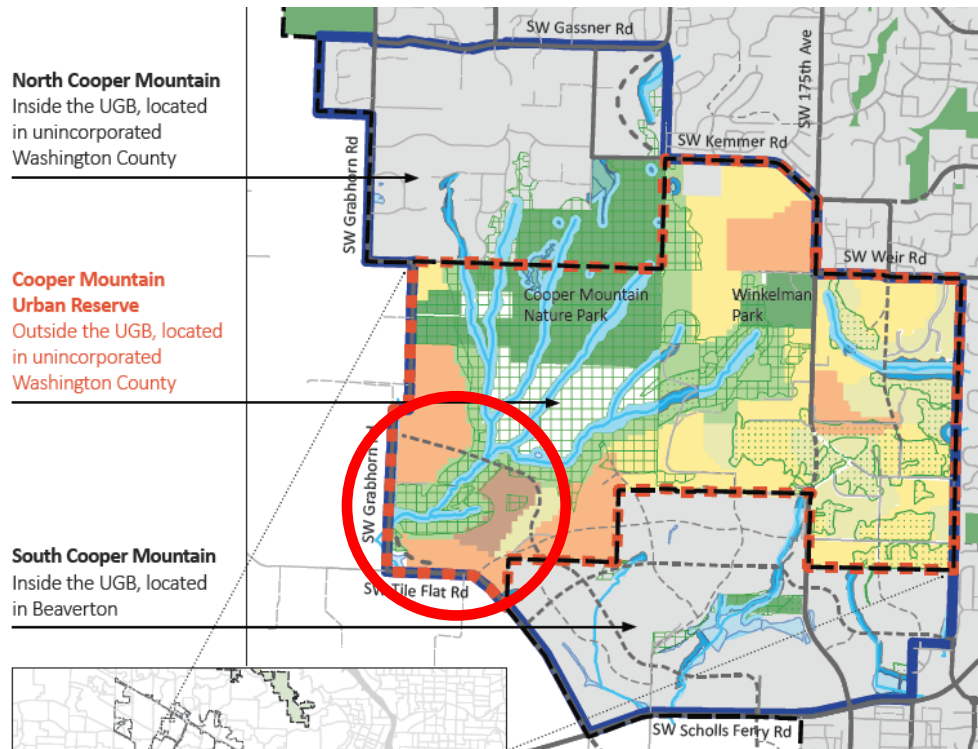
MAP LEGEND:

- PARKS
- NATURAL RESOURCE AREAS
- ROADS
- POTENTIAL NEW CONNECTIONS
- POTENTIAL NEW NEIGHBORHOODS
- SOUTH COOPER MOUNTAIN NEIGHBORHOODS

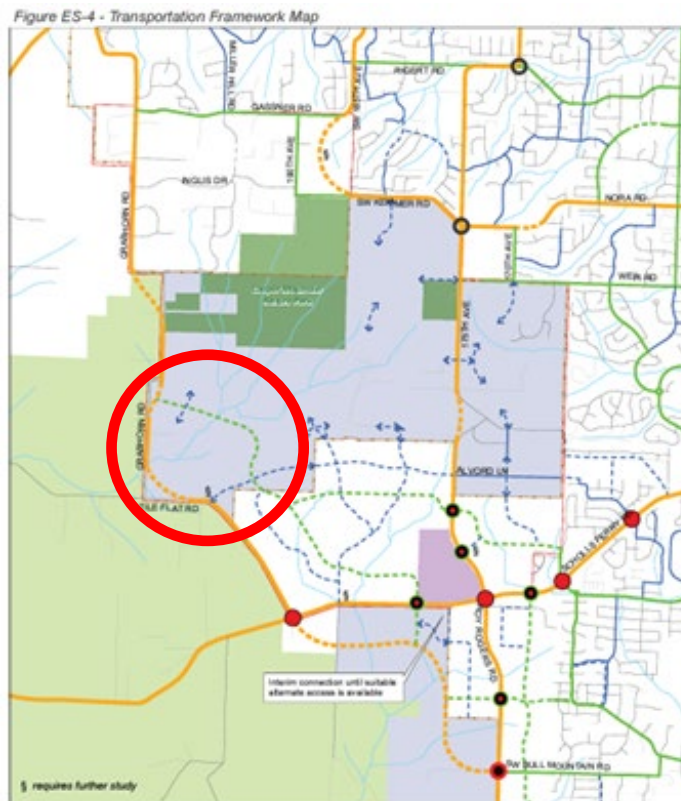
WALKING DISTANCE:



COOPER MOUNTAIN CONCEPT PLAN LAND USE FRAMEWORK (2018)



SOUTH COOPER MOUNTAIN CONCEPT PLAN TRANSPORTATION FRAMEWORK (2014)



Without this important internal collector connection, the community plan does not meet county policies for access to Grabhorn Road (a county arterial street).

The city's current plan includes a single neighborhood route-level loop street connecting to Grabhorn Road in two locations. However, the Washington County Transportation System Plan and Road Design and Construction Standards both include policies limiting connections to an arterial street from either another arterial street or a collector-level street. There is a path to a design exception if a proposal meets certain criteria in the Road Design and Construction Standards. However, the County Engineer submitted comments to Beaverton staff on December 5, 2022 (attached), saying it was unlikely that a design exception for the proposed looped neighborhood route connection to Grabhorn Road would be approved.

It is disappointing to continue to see the looped neighborhood route connection in the proposed plan considering the known deficiency with regard to county policies and in light of prior guidance from the County Engineer and staff. In addition to not conforming with county policies, the proposed neighborhood route design is unlikely to meet the traffic need threshold to install a future traffic signal at either of the currently indicated intersections on Grabhorn Road. This could lead to future safety issues as neighbors try to navigate onto an already heavily trafficked Grabhorn Road without the benefit of a traffic signal.

Beaverton's existing Transportation System Plan Goals and Policies also support a greater level of connectivity than has been included in the Cooper Mountain Community Plan:

6.2.2. Goal: A balanced multimodal transportation system that provides mobility and accessibility for users. Policies: e) Provide connectivity to each area of the City for convenient multi-modal access. Ensure pedestrian, bicycle, transit, and vehicle access to schools, parks, commercial, employment, and recreational areas, and destinations in station areas, regional and town centers by identifying and developing improvements that address connectivity needs.

6.2.3 Goal: A safe transportation system. Policies: g) Maintain access management standards for streets consistent with City, County, and State requirements to reduce conflicts among vehicles, trucks, rail, bicycles, and pedestrians. Preserve the functional integrity of the road system by limiting access per City standards.

6.2.4 Goal: An efficient transportation system that reduces the percentage of trips by single occupant vehicles, reduces the number and length of trips, limits congestion, and improves air quality. Policies: a) Develop an energy efficient transportation system. Actions: Implement measures to reduce average trip distance, such as additional street connectivity, fostering more local retail and service business, and land use decisions.

We respectfully request that you direct modification of the plan as follows:

1. Amend the Cooper Mountain Community Plan in all applicable locations to include the previously planned internal collector street connection from South Cooper Mountain to Grabhorn Road.
2. Amend the draft Transportation System Plan Chapter 2: Goals and Policies to include the previously planned collector street connection from South Cooper Mountain to Grabhorn Road, including on Figure 4.11a in Cooper Mountain Volume IV Comprehensive Plan Updates (September 2024).
3. Add the collector street to the Cooper Mountain Transportation Project List in Transportation System Plan Appendix O.
4. Remove Project Number 29 (new route, Grabhorn neighborhood) from the Cooper Mountain Transportation Project List in Transportation System Plan Appendix O.
5. Move Policy f from Active Transportation Policies to Complete and Connected Streets Policies and modify the language to say (additions in underline):

Policy f) *In collaboration with Washington County and THPRD, plan, design, and implement a vehicle bridge with pedestrian and bike facilities to connect the Cooper Lowlands and Grabhorn Meadow neighborhoods, applying the following principles:*

- i. Minimize impact to McKernan Creek and riparian habitat.*
 - ii. Provide passage for deer and other large mammals, such as by elevating the bridge to allow animals to pass underneath.*
 - iii. Work with natural resource stakeholders during the design process.*
 - iv. Coordinate bridge design and construction with THPRD’s Trails Functional Plan, and where feasible, with the Cooper Mountain Utility Plan.*
6. Amend language in Policy r in Complete and Connected Streets Policies as follows:

Policy r) *Design bridges/culverts (vehicular and pedestrian-bike) for safe passage of deer and other large mammals in the following locations:*

- iii. The vehicular/pedestrian/bike bridge between the Cooper Lowlands and Grabhorn Meadow neighborhoods.*

October 2, 2024

COOPER MOUNTAIN COMMUNITY PLAN – Washington County comments

Page 7

It takes strong multijurisdictional collaboration and partnerships to ensure we have a complete and connected countywide transportation system. Washington County looks forward to continuing our work with the city to make the new Cooper Mountain community a great place to live. We are ready to continue dialogue with the city on funding and design considerations for transportation infrastructure, including wildlife crossing designs and desired bicycle and pedestrian facilities on both internal and abutting streets.

Sincerely,



Stephen Roberts, AICP

Director of Land Use & Transportation

Attachments:

- Memo from Stacy Shetler, Washington County Engineer, to Cassera Phipps, City of Beaverton, dated December 5, 2022
- Memo from Stephen Roberts, Washington County Director of Land Use & Transportation, to Dan Weinheimer, Beaverton Assistant City Manager/Interim Community Development Director, dated August 14, 2023
- Memo from Jessica Pelz, Washington County Land Use & Transportation Policy Analyst, to Alissa Maxwell, Beaverton Capital Planning Project Manager, dated February 16, 2024



LAND USE & TRANSPORTATION MEMORANDUM

Planning and Development Services

To: Cassera Phipps, City of Beaverton
From: Stacy Shetler, County Engineer – Washington County
Date: December 5, 2022
Subject: Cooper Mountain Preferred Concept Transportation Concerns

Thank you for the opportunity to participate in the Cooper Mountain Community Plan process and to provide additional comments on the preferred land use and transportation scenario. This memo includes our concerns with the draft transportation network shown on the preferred concept map and reviews the feasibility of the proposed design exceptions for neighborhood route connections to a county arterial road.

Regional transportation network responsibility

County staff are concerned with maintaining mobility throughout the regional transportation network, which is primarily comprised of the county's connected arterial system. One way we maintain mobility on the arterial system is by relying upon a network of collector roads to reduce direct access to the arterial roads. This is even more important in urban areas of the county where there are higher densities of development and resulting traffic demand.

Previous planning efforts

There have been several planning studies and transportation analysis efforts in the past decade, all of which have included a collector road connection from South Cooper Mountain north to Grabhorn Road, including: the South Cooper Mountain Concept Plan, South Cooper Mountain Community Plan, the 2018 Metro Urban Growth Report, and the County's Urban Reserves Transportation Study. The reason the future collector road was included in those planning efforts is because it makes sense for a well-planned and connected urban community. Without the collector extension, an entire large neighborhood cannot access the amenities in the remainder of Cooper Mountain without traveling along Grabhorn Road and Tile Flat Road, both of which are estimated to have significant amounts of traffic in 2040.

The proposed collector road would be beneficial to the Grabhorn Meadows neighborhood as well as aid the county in managing traffic on Tile Flat Road and Grabhorn Road. The proposed looped neighborhood route shown now in the Grabhorn Meadows neighborhood would not likely meet warrants for a traffic signal and it will be increasingly difficult for travelers to turn out onto Grabhorn as traffic increases over time. On the other hand, a collector extension would likely meet signal warrants or be considered for a roundabout intersection, providing easier travel options into and out of the neighborhood.

Review of preferred concept for proposed design exceptions

In reviewing the Cooper Mountain preferred concept, the city would need to request four exceptions to allow neighborhood route connections to an arterial: Siler Ridge Lane connection to 175th Ave, Alvord Lane connection to 175th Ave, and two connections in the Grabhorn Meadows neighborhood to Grabhorn Road. The Washington County Development Code includes access requirements as well as a provision for potential design exceptions:

CDC 501-8.5 (B)(4)

Direct access to arterial roads shall be from collector or other arterial streets.

Exceptions for local streets and private accesses may be allowed through a Type II process when collector access is found to be unavailable and impracticable by the Director.

The County's Road Design and Construction Standards contain the criteria for proposed design exceptions:

Road Standards 220.020.1

Criteria for Exception

The County Engineer may grant an exception to the Community Development Code for access standards when any one of the following conditions is met:

- a. The specification or standard does not apply in the particular application;*
- b. Topography, right-of-way or other geographic conditions impose an economic hardship on the applicant and an equivalent alternative is available which can accomplish the same design objective;*
- c. A minor change to a specification or standard is required to address a specific design or construction problem which if not allowed will result in an undue economic hardship.*

Without additional supporting materials, the following conclusions can be drawn about the four proposals:

- Siler Ridge Lane neighborhood route connection to 175th Ave
 - a. In this case, a proposed collector road connection is directly across 175th Ave from Siler Ridge Lane, making an intersection feasible for Siler Ridge Lane, which would be a short extension and infeasible as a collector road due to topography and existing development constraints.
 - b. See a., Siler Ridge Lane is an existing local road and it is infeasible for it to be extended as a collector roadway.
 - c. Not applicable.

- Alvord Lane neighborhood route connection to 175th Ave
 - a. It appears as though a neighborhood route design exception was previously granted to the existing portion of Alvord Lane west of 175th Ave within South Cooper Mountain; therefore, it would be consistent to grant a design exception to the extension of Alvord Lane to the east.
 - b. It would not make sense to reclassify Alvord Lane to a collector from a neighborhood route for the short segment to the east.
 - c. Not applicable.
- Loop connection (with two separate connections) to Grabhorn Road in the Grabhorn Meadows neighborhood.
 - a. Not applicable.
 - b. A collector connection, as shown in previous plans, appears feasible and doesn't appear to impose a hardship. Without the collector, vehicular connectivity and circulation benefits are lost. The proposed plan with neighborhood routes does not meet the intended design objectives and requires local vehicular trips to use the regional facility.
 - c. Not applicable.

Based on this preliminary analysis, it is unlikely the necessary neighborhood route design exception would be approved for the proposed connections to Grabhorn Road.




LAND USE & TRANSPORTATION MEMORANDUM

Office of the Director

Date: August 14, 2023

To: Dan Weinheimer, Assistant City Manager/Interim Community Development Director
City of Beaverton

From: Stephen Roberts, Director of Land Use & Transportation 

Subject: Cooper Mountain Community Plan Transportation Comments

Dan,

Thank you for the opportunity for Washington County staff to provide comments on the draft Cooper Mountain Community Plan and Preferred Approach Concept Plan Map. We appreciate being included throughout the city's planning process. We look forward to continuing to coordinate with City of Beaverton as planning and development of the area proceeds.

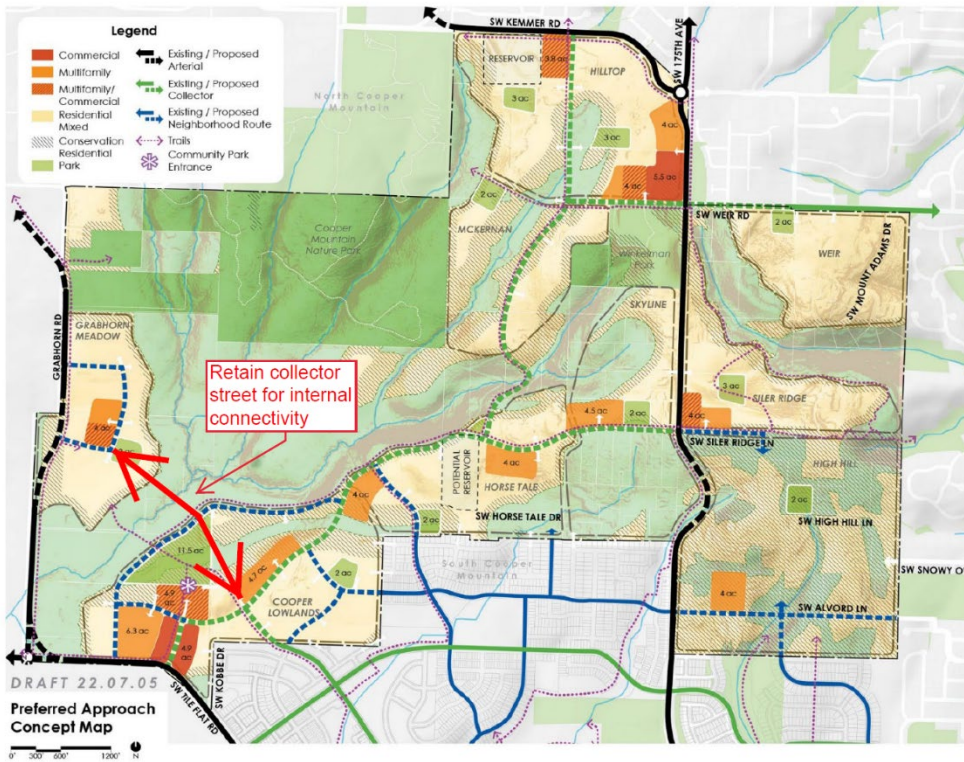
Washington County staff participated on the Technical Advisory Committee for the Cooper Mountain Community Plan. Overall, the draft Cooper Mountain Community Plan shows a vision for a robust community-focused place with walkable streets, lively commercial areas and a coordinated system of parks and trails. Providing for internal circulation and connectivity throughout this new community area is important.

While we are generally supportive of the plan, County staff continue to have concerns that we have previously shared with City staff about the proposed transportation plan for Cooper Mountain. Our primary concern is the staff recommendation to not include the proposed internal collector connection from South Cooper Mountain to Grabhorn Road in the Preferred Approach plan. This connection was included in previous planning efforts such as the South Cooper Mountain Concept Plan (acknowledged in 2015), South Cooper Mountain Community Plan (adopted in 2015), the 2018 Metro Urban Growth Report, and the Washington County 2021 Urban Reserves Transportation Study. In addition, the South Cooper Mountain Community Plan contains policies about the need for the proposed collector connection:

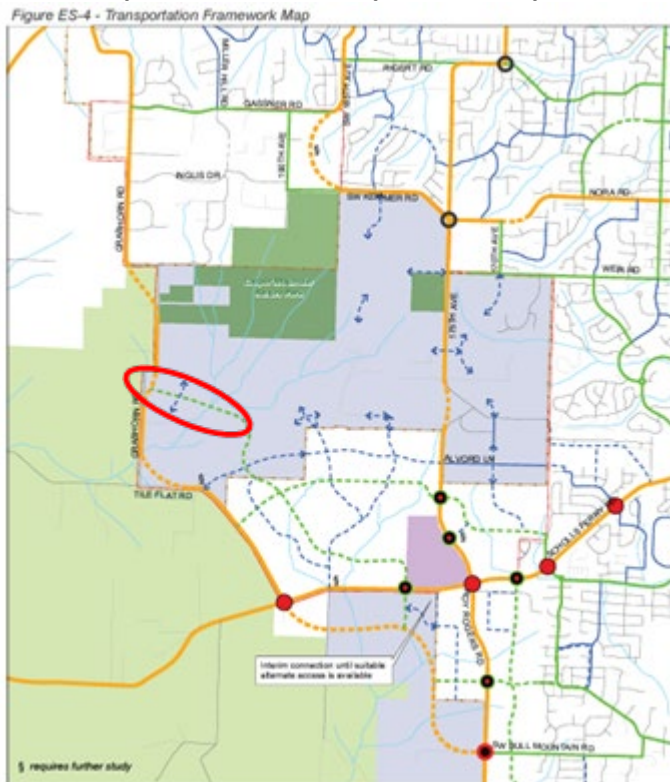
"The alignment of the North-South Collector shall account for, and not preclude, future extension to the west to SW Grabhorn Road and south to serve Urban Reserve 6C." (SCMCP Street Policies)

The maps below show the City's Preferred Approach Concept Map with the approximate location of the requested collector connection (illustrative only) and the previous South Cooper Mountain Concept Plan Transportation Framework Map with the collector connection.

PREFERRED APPROACH CONCEPT MAP



South Cooper Mountain Concept Plan Transportation Framework Map (2014)



Without this important collector connection, the city's Preferred Approach plan does not appear to:

- Meet the intent of Metro Title 11, Section 2.07.1120 (7): A conceptual street plan that identifies internal street connections and connections to adjacent urban areas to improve local access and improve the integrity of the regional street system. For areas that allow residential or mixed-use development, the plan shall meet the standards for street connections in the Regional Transportation Functional Plan.
- Meet the intent of Metro Regional Transportation Functional Plan Title 1, Section 3.08.110 C: To improve connectivity of the region's arterial system and support walking, bicycling and access to transit, each city and county shall incorporate into its TSP, to the extent practicable, a network of major arterial streets at one-mile spacing and minor arterial streets or collector streets at half-mile spacing considering the following: 1. Existing topography; 2. Rail lines; 3. Freeways; 4. Pre-existing development; 5. Leases, easements or covenants in place prior to May 1, 1995; and 6.
- Meet the intent of Metro Regional Transportation Functional Plan Title 1, Section 3.08.110 D: To improve local access and circulation, and preserve capacity on the region's arterial system, each city and county shall incorporate into its TSP a conceptual map of new streets for all contiguous areas of vacant and redevelopable lots and parcels of five or more acres that are zoned to allow residential or mixed-use development. The map shall identify street connections to adjacent areas to promote a logical, direct and connected system of streets and should demonstrate opportunities to extend and connect new streets to existing streets, provide direct public right-of-way routes and limit closed-end street designs consistent with subsection E.
- Conform with county policies and requirements for access to an arterial road. The Washington County Community Development Code and Road Design and Construction Standards both include policies that connection to an arterial road must be from an arterial or collector classification road. While there is a path to a design exception, the County Engineer submitted comments to City staff on December 5, 2022 saying it was unlikely that a design exception for the proposed looped neighborhood route connection to Grabhorn Road would be approved because it does not meet the exception criteria.
- Provide adequate safe circulation within the planning area. In addition to being contrary to County access requirements, the proposed neighborhood route connection to Grabhorn Road is unlikely to meet warrants for future signalized intersections on Grabhorn Road. This could lead to safety issues as future community members try to turn onto a heavily trafficked Grabhorn Road with no other means of access to this neighborhood.
- Provide for emergency access redundancy and resiliency for the future neighborhood located off Grabhorn with no other point of vehicular access or egress.

August 14, 2023

Subject: Cooper Mountain Community Plan Transportation Comments

Page 4

We acknowledge there may be environmental concerns with the proposed street connection due to a proposed creek crossing. However, it appears the roadway crossing could be constructed at or very near the location of an existing driveway that already crosses the creek. This could provide an opportunity to significantly improve the condition of the creek corridor by ensuring adequate space for creek flow and a habitat corridor can be provided beneath a bridge. The County is happy to work with the city on design considerations, including wildlife crossing designs and desired bicycle and pedestrian facilities. We look forward to continuing these productive discussions with the City of Beaverton as planning and development of this area progresses.

City of Beaverton previously submitted a letter supporting Washington County Ordinance No. 882, which would adopt a similar collector street in the River Terrace 2.0 community planning area in Tigard, for similar reasons. We request that staff modify the Cooper Mountain Community Plan Preferred Approach and include the previously planned collector connection from South Cooper Mountain to Grabhorn Road.

Thank you for your careful consideration of these concerns.

cc: Rob Zoeller, Cooper Mountain planning project manager
Anna Slatinsky, Planning Manager

Erin Wardell, Planning and Development Services Manager
Dyami Valentine, Principal Transportation Planner
Jessica Pelz, Policy Analyst



LAND USE & TRANSPORTATION MEMORANDUM

OFFICE OF DIRECTOR

To: Alissa Maxwell, Capital Planning Project Manager, City of Beaverton
From: Jessica Pelz, Policy Analyst
Subject: Cooper Mountain Transportation Funding Strategies
Date: February 16, 2024

Alissa,

Thank you for the opportunity to review and comment on the preliminary transportation funding assumptions for the Cooper Mountain planning area. We appreciate being included throughout the city's planning process. We look forward to continuing to coordinate with the City of Beaverton on funding strategies and other issues as planning and development of the area proceeds.

We are generally supportive of Beaverton's proposed funding scenarios, with a few important caveats:

- As we have stated in several written communications, we do not support the city's preferred approach as shown without the collector connection from South Cooper Mountain to Grabhorn Road (project #24). The current preferred approach is inconsistent with county connectivity policies and does not meet county requirements for access to an arterial road, nor does it meet the intent of various state and regional policies for connectivity. Project #24 is currently shown as "optional"; we request that this project be included in the comprehensive plan maps moving forward and accounted for in the funding plan.
 - While this is primarily a connectivity concern, the Cooper Mountain Community Plan traffic analysis (October 2022) also shows a benefit to four out of five nearby intersections with the collector connection to Grabhorn Road, with the greatest benefit to operations at the Scholls Ferry Road/Clark Hill Road and Tile Flat Road/Grabhorn Road intersections. This is an important consideration in addition to connectivity needs, particularly because funding is not currently identified for either of those identified improvement projects.
- County staff look forward to continued coordination and cooperative refinement of estimated project costs and funding responsibilities/opportunities for improvements to county roads. Several projects identified as a county responsibility are also attributable at least in part to the forecasted urban development. For example, projects 3 (Grabhorn Road/Tile Flat Road intersection), 20 (Grabhorn Road/Gassner Road intersection), and

22 (Farmington Road/Clark Hill Road intersection) are identified in the Cooper Mountain Community Plan traffic analysis as having an additional impact from Cooper Mountain development.

County transportation capital projects are prioritized and funded through our Capital Improvement Plan process, and staff cannot commit to funding any specific projects outside that process. However, we can commit to being good partners and we look forward to continuing conversations around collaborative funding strategies and methods so this area can grow and develop according to the community's vision. Thank you for your consideration of our concerns, and please let me know if you'd like to discuss further.