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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**MATS JARLSTROM**, an individual,

Plaintiff,

v.

**CITY OF BEAVERTON**, an Oregon municipal  
corporation,

Defendant.

Case No.: 3:14-cv-00783-AC

**DECLARATION OF MATS  
JARLSTROM**

I, Mats Jarlstrom, being sworn, say:

1. I am a resident of Beaverton, reside at 13520 SW Hart Road in the Hyland Hills neighborhood between Murray Boulevard and Hall Boulevard and make this declaration based upon my own personal knowledge. I am a self-employed electronics engineer. One of my recent projects has been a contract with the U.S. Navy to maintain, upgrade and calibrate digital storage oscilloscopes for the U.S. Naval Air Warfare Division that are used in the testing and evaluation of military ordinance.

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2. My family and I have lived in Beaverton for 19 years. I am a licensed Oregon driver. Most of my driving activity occurs within the City of Beaverton. I estimate that I am on Beaverton roads 10 or more times per week.

3. Within the City of Beaverton, much of my driving involves traveling on Murray Boulevard, Allen Boulevard, Hall Boulevard, Lombard Avenue, Denny Road and Tualatin Valley Highway. I regularly drive through Beaverton signalized intersections at Lombard and Allen, Hall and Allen, Murray and Allen and Tualatin Valley Highway and Murray. My driving activity is sometimes alone and other times involves my family which consists of my wife, son and daughter, either individually, all together or a combination.

4. During the last nine months, I have devoted approximately one-third of my time to the study and analysis of traffic light timing at intersections in the City of Beaverton. This has involved monitoring and the taking of measurements at multiple intersections and an exhaustive analysis of the available literature regarding the engineering of traffic control devices and in particular the safety issues related to yellow signal timing in connection with traffic flow. Based upon my background and experience as an electronics engineer, I believe that I am qualified to analyze the basic physics of traffic device engineering and to assess the potential for increased levels of collisions where yellow light intervals are shorter than required under the specifications in the Oregon Vehicle Code. I am confident that, once we receive responses to discovery requests regarding historic accident information in Beaverton intersections, we will be able to demonstrate that the yellow light intervals in Beaverton's intersections, which are too

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short by approximately two seconds or more depending upon the intersection, are the cause of a higher level of accidents involving injury or death than would occur if the intervals were appropriately timed.


5. Based upon what I have learned about the serious technical errors made by the City of Beaverton in the timing of the City's yellow light intervals, I have significant fear about being involved in a serious accident while traveling through signalized intersections in Beaverton. This concern relates not only to myself and passengers in my vehicle, but also to the occupants of other vehicles with which I might collide and to pedestrians crossing these intersections who, in my opinion, are unnecessarily exposed to the risk of death or serious injury due to the shortness of Beaverton's yellow light intervals.

6. Before filing this lawsuit, I attempted on multiple occasions to explain to the Beaverton City Council, the City's Public Works Director and its transportation engineer the serious public safety issues resulting from yellow light intervals that are too short at Beaverton intersections. Dating back to September 3, 2013, I have appeared before the Beaverton City Council a total of 13 times. I have also met with Public Works Director Peter Arellano and talked by phone with traffic engineer Jabra Khasho. There is no question in my mind that the City of Beaverton, its Public Works Director and its traffic engineer are all aware of the yellow light interval timing issues that I have raised, but the City of Beaverton through these officials has repeatedly refused to make the changes to the City's traffic light timing that are necessary to eliminate the obvious danger to myself and to others traveling through or walking across Beaverton's signalized intersections.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED this 3rd day of July, 2014.

  
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Mats Jarlstrom