

## Responses to Issues Raised by the Board of Commissioners on August 5, 2009

### 1. *How do the Coburg population numbers compare with the BCC adopted numbers?*

Coburg Population Forecasts are discussed generally in the IAMP on pages 2-4 through 2-5, and in more detail on pages 3-1 through 3-2. The numbers in the IAMP are based upon the existing Coburg Comprehensive Plan, as required by ODOT's Administrative Rule, in order to ensure consistency with the Comprehensive Plan. The IAMP traffic modeling analysis also considered population, dwelling unit, and employment forecasts used for the Regional Transportation Plan produced for the Central Lane Metropolitan Planning Organization (MPO) area (2004), and the 2004 Coburg Urbanization Study produced by EcoNorthwest. The numbers are used to forecast traffic operations in 2031 under a no-build scenario to help determine whether congestion will be present and at what level.

The City's Comprehensive Plan adopted in September 2005 states the existing population (2004) was nearly 1,050 people. It forecasted population would reach 3,300 by 2025 (Comprehensive Plan Introduction, [http://www.coburgoregon.org/shop/images/COBURG\\_COMPREHENSIVE\\_PLAN.pdf](http://www.coburgoregon.org/shop/images/COBURG_COMPREHENSIVE_PLAN.pdf)).

This was the adopted population forecast at that time based upon the accepted methodology at that time. In part, it is assumed the Coburg wastewater treatment plant would be constructed in the short term, during the 20-year Comprehensive Plan period, as reflected in Coburg's adopted Public Facilities policies (Comprehensive Plan page 25).

ODOT initially developed three land use scenarios as part of the IAMP process that assumed a new wastewater treatment plant would be built, Coburg would be updating its Comprehensive Plan, and a ugb expansion would occur. Each of these scenarios was based on 2025 population and employment forecasts from the sources described above, extrapolated to 2031 based upon average annual growth rates. These scenarios ". . . assumed expansion of the Coburg UGB to accommodate future population forecasts (consistent with the RTP and Coburg Urbanization Study)" (IAMP page 3-3, 2<sup>nd</sup> paragraph). The expansion would be predicated upon construction of a new wastewater treatment plant. Wastewater services would support higher intensity development.

An earlier funding request for the wastewater plant unexpectedly failed, and Coburg experienced severe budget shortfalls. Comprehensive Planning efforts were delayed as a result. ODOT therefore developed a fourth alternative assuming a more conservative population forecast, in order to be consistent with the existing urban growth boundary as reflected in the existing Comprehensive Plan. "The no-build analysis for this IAMP is based on Comprehensive Plan growth assumptions because UGB expansion - although desired by Coburg - has not yet been adopted into the Coburg Comprehensive Plan due to lack of an adequate wastewater facility to serve the additional population." (IAMP page 3-3, 2<sup>nd</sup> paragraph).

ODOT and their consultant did a separate population forecast approaching the issue from the standpoint of the existing land area within the urban growth boundary, and what it could support based upon existing conditions. ODOT evaluated the existing land area within the urban growth boundary (ugb) including vacant and developable

lands. In addition it was assumed there would be no wastewater system, which meant that a significant land area would need to be devoted to on site sewage disposal systems. ODOT's assumptions led to a much more conservative forecast of 1,819 in population by 2025 (IAMP page 3-1, Section 3.2.1).

This more conservative forecast results in the identified design providing more capacity than would be consumed in the 2031 planning horizon if there were no wastewater system development or future ugb expansion. While IAMP policies are based upon the more conservative 1,819 figure, the existing ugb, and absence of a wastewater system, the design concept supports the higher population forecast because in fact it is likely that this population will be reached given that the wastewater plant is now moving forward.

In order to be consistent with the existing Comprehensive Plan while also addressing the likelihood of a ugb expansion, ODOT included Policies 2 and 3 in the IAMP in order to reduce the interchange capacity available to new development that could occur before a Comprehensive Plan update, to a level commensurate with the 1,819 population forecast. So, if the interchange is fully rebuilt before the comprehensive plan and ugb are updated, the IAMP restricts new development from reliance on its capacity.

When Coburg updates its Comprehensive Plan it will need to use Lane County adopted population numbers. As described in IAMP Section 6 in several policies, ODOT will work with Coburg and Lane County to amend the IAMP as necessary to reflect the Lane County-adopted population forecast numbers, and to be consistent with the updated Comprehensive Plan.

The Lane County population forecasts adopted June 17, 2009 predict a total Coburg population of 2,628 by 2025, 3,363 by 2030, and 4,251 by 2035.

Third party, expert observations regarding population forecasting may be helpful to the Commissioners. As discussed in the 2004 Coburg Urbanization Study, there is a high degree of uncertainty in predicting long term population growth, especially for small cities. Attachment 4 is an abstract on this topic. The full document is at the following link, and discusses at length population forecasts and how they were used.

<http://www.coburgoregon.org/shop/images/urbanizationfinal.pdf>

*2. Are there incremental phases that we can approve today?*

The IAMP is the overall conceptual and policy document that must be adopted for any one construction phase to move forward. As stated in the Oregon Highway Plan, IAMPs are not construction projects, only concepts by which engineers may then scope and design the project.

*3. If we do not adopt this, will the west side improvement move forward?*

No, they will not move forward.

4. *Regarding the population number, what number was used for the modeling? I cannot find it in the binder.*

Please also refer to the response to question #1. According to ODOT staff, the regional planning modeling process completed by the Central Lane Metropolitan Planning Organization (MPO) in 2005 assigned approximately 3,500 residents to Coburg. MPO staff recollects that this approximate number was based upon the Coburg Urbanization Study. The number is believed to be 200 people higher than the 3,300 population forecast in the adopted Coburg Comprehensive Plan, because the modeling was done before the final population forecast numbers were refined and adopted by the LCOG Board. This model forecast was the basis for the project design element. The project design assumed that the wastewater treatment plant would be built and that the ugb would be expanded to accommodate the forecasted population.

At the same time, since Coburg's Comprehensive Plan did not reflect a ugb expansion, and whether or not the wastewater treatment plant would be funded and built were increasingly unknown at the time, and since the IAMP must be consistent with the Comprehensive Plan, a population forecast of 1,819, as explained in #1 above, was used in developing policy about use and protection of the interchange's capacity with regard to new development. The 1,819 population forecast was based upon an analysis of land area within the existing ugb, vacant and developable lands, and land area needed to accommodate on-site disposal systems.

In other words, the identified design provides more capacity than would be consumed in the 2031 planning horizon if no wastewater system development or future ugb expansion occurs. IAMP policies provide for either eventuality - whether or not the Comprehensive Plan is updated, or the ugb is expanded, before or after the construction of interchange improvements. Policies 2 and 3 in the IAMP reduce the interchange capacity available to new development to a level commensurate with the 1,819 population number. Policies 5 and 6 provide for the eventuality of a Comprehensive Plan update, population increase, and ugb expansion.

The LCOG Board-adopted population forecast is required to be used for project modeling because it is the number that is consistent with the Comprehensive Plan. When Coburg updates its Comprehensive Plan it will need to use Lane County adopted population numbers. Given that the wastewater treatment plant is now financed and progressing, an update to the Comprehensive Plan and ugb expansion is likely to be required in order to accommodate population growth resulting from the availability of urban services. As described in IAMP Section 6 in several policies, ODOT will work with Coburg and Lane County to amend the IAMP as necessary to reflect the updated Comprehensive Plan, based upon Lane County-adopted population forecasts, so that the IAMP continues to be consistent with the Comprehensive Plan.

5. *Mr. Moore's letter states we should agree on the function of the interchange and that we should only allow commercial development that serves the city, i.e., not allow general retail. The document should make it clear that the interchange capacity cannot be used to meet any capacity needed by new development.*

The IAMP function statement (Section 1.4 of the IAMP) provides that, while the interchange does serve multiple purposes, it is not the function of the interchange "to serve additional or expanded commercial land uses (beyond the existing zoned

potential) or regional commercial development”. This is in agreement with Mr. Moore’s letter.

IAMP Section 6, Policies 2, 3, 5, 6, and 9 address land development and traffic impacts.

- Policies 2 and 3 establish an “alternative mobility standard” in the event that IAMP-specified improvements occur in advance of a Comprehensive Plan update, to protect interchange capacity. An alternative mobility standard is a standard that allows less congestion -and therefore less trip generation from new development -- than would normally be allowed under the Oregon Highway Plan (OHP). The policies apply to two intersections, Van Duyn Road/I-5 Northbound Ramps, and Pearl Street/Coburg Industrial Way.
- Policies 5 and 6 provide for an update to this alternative mobility standard upon Coburg’s update to its Comprehensive Plan.
- Policy 9 addresses any urban growth boundary expansion that occurs east of I-5, because the IAMP forecasted traffic operations relied on assumptions in the Coburg Urbanization Study that all development would occur west of I-5. Policy 9 requires a reassessment of the IAMP recommendations to address this change.
- Policy 10 provides a mechanism to apply ODOT’s access management requirements to new development, for any new development that results in an increase in average daily traffic or any increase in truck trips.

Taken together, these policies will protect the function and reserve any post-construction excess capacity of the interchange until the City updates its comprehensive and transportation system plan, at which time the necessity for updating the IAMP must also be revisited, as provided for in the IAMP policies.

In summary, 6 of 14 policy statements deal directly and very specifically with traffic generation from new development, integrating land use planning and transportation, and protecting the function and capacity of the interchange.

6. *General retail would increase the amount of single occupancy vehicle traffic, therefore increasing congestion, as compared to commercial/industrial that would probably reduce the amount of single occupancy vehicle traffic. If you allow retail you’ll increase the amount of traffic and therefore it may not be appropriate. Would manufacturer outlet malls be allowed?*

Please also see the response to question #5, above and also Attachment 3, information about City of Coburg permitted land uses.

No matter what type of new development is proposed within the IAMP area, if Coburg has not yet updated its Comprehensive Plan, it will be subject to a more restrictive mobility standard as specified in policies 2 and 3 of the IAMP, as explained under question #5 above. In addition, the IAMP function statement (Section 1.4 of the IAMP) provides that, while the interchange does serve multiple purposes, it is not the function of the interchange “to serve additional or expanded commercial land uses (beyond the existing zoned potential) or regional commercial development”. This is in agreement with Mr. Moore’s letter.

The purpose of the IAMP is to protect the interchange. The IAMP is not the appropriate document for DLCD, ODOT or Lane County to mandate land use in the City or to

dictate economic development strategy, and it does not appear that DLCD intends to do so. The City of Coburg already has plan designations and zoning designations on lands within the urban growth boundary. Changes to those designations must be made through an inclusive public process and the procedural requirements and analysis set forth in state land use goals.

*7. I don't feel DLCD's concern is adequately addressed. I'm concerned about lands inside this plan area.*

To clarify, the IAMP boundary includes lands inside the city limits/urban growth boundary and outside the urban growth boundary.

*8. The concern of DLCD is to reserve this interchange for industrial development, I think the policy language in Section 6 needs to be much more specific to address land uses. We have the cart before the horse saying that we'll look at the code language later, after we adopt the plan. The time is now for us to adopt a plan that really focuses on economic development for Coburg, set the land uses, and makes sure those land uses will be a commitment to good jobs with the kind of industrial development that is intended. It's important to protect Eugene and Springfield retailers and provide certainty for Coburg.*

Please see previous discussions above. By establishing a lower mobility standard until Coburg updates its Comprehensive Plan, the policies in Section 6 reserve excess interchange capacity and limit the reliance of new development on that capacity. This is a sound approach to integrating land use and transportation planning for purposes of this document which is to protect the interchange's capacity.

In addition, the IAMP function statement (Section 1.4 of the IAMP) provides that, while the interchange does serve multiple purposes, it is not the function of the interchange "to serve additional or expanded commercial land uses (beyond the existing zoned potential) or regional commercial development". This is in agreement with Mr. Moore's letter.

Coburg is currently working on an updated urbanization study. The previous study was done in 2004 by EcoNorthwest, and was used extensively in the traffic modeling analysis in the Coburg IAMP. The updated urbanization study will be used to update the Coburg Comprehensive Plan, including any necessary plan amendments and zone changes. When that occurs, as directed by policy in the IAMP, the IAMP will be updated as necessary so it continues to be consistent with the Coburg Comprehensive Plan and to protect the interchange's capacity to serve at the acceptable state mobility standard.

When Coburg updates its Comprehensive Plan in the future, it must be consistent with state land use law, and acknowledged (approved) by DLCD. If the update does not comply with state land use law then DLCD will not acknowledge the plan and it will not be allowed to go into effect.

Code changes referenced in the August 5, staff report and cover memo are necessary to implement the IAMP. It is standard practice to adopt code language after policy is adopted in order to implement the adopted policy. The code changes will be to Lane Code, establishing an IAMP combining (overlay) zone and language that references the policy in the IAMP. The City of Coburg already adopted zoning code amendments to

implement the IAMP (see Section 4 of your binder, beginning on page 42 of 148). Any additional changes to City of Coburg zoning requirements are not in Lane County's jurisdictional control.

9. *How are people going to access their property when Roberts Road is cut off? I'd like to know where the farm land stops and the city begins. I don't agree with the access management requirements.*

The Roberts Road realignment design included extensive -even exhaustive -outreach to property owners to ensure no access is cut off. It is County staff's understanding that access issues in the Roberts Road area have been resolved.

There are several maps throughout the IAMP document showing Comprehensive Plan designations, zoning designations, and aerial views. Many of these maps are at the conclusion of IAMP Section 2 (in binder Section 1).

Much of the access management controls will occur upon redevelopment rather than affecting current land uses. ODOT has worked hard to resolve access issues to property owner satisfaction.