



Oregon

Theodore R. Kulongoski, Governor

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Board of County Commissioners
Lane County
125 East 8th Avenue
Eugene, OR 97401



**RE: Coburg – I-5 Interchange Area Management Plan Adoption
(Coburg File # PA-01-08, DLCD # 002-08; Lane County File # None, DLCD
011-08)**

Commissioners:

Thank you for the invitation to participate in your work session on September 16th to discuss the proposed Coburg Interchange Area Management Plan (IAMP). As indicated in our earlier letter of comment, we encourage you to consider amending the plan to make it clearer that the function of the interchange is not to serve additional commercial development within the interchange area – i.e. beyond that already called for in Coburg’s existing acknowledged comprehensive plan. This letter explains our concerns in more detail and outlines possible amendments for your consideration.

We believe that changes are needed because the key policy language in the plan is ambiguous about the function of the interchange as it relates to accommodating expanded commercial development in the future. The key policy statement defining the “commercial access” function of the interchange is set forth in Section 1.4 of the IAMP. It says only that serving expanded commercial development or regional commercial development is not a “primary” function of the interchange. The unintended effect of this wording is, we believe, to say that serving expanded commercial development and regional commercial development **is** a function to be served by the interchange; just that it is a “secondary” rather than “primary” function.

This ambiguity is significant because the IAMP does not provide guidance on how subsequent planning or zoning decisions will be judged against this policy. We believe that additional commercial development would be allowed consistent with this policy so long as it does not compromise the ability of the interchange to serve its “primary” functions. Since the IAMP includes roadway improvements that would substantially increase the capacity of the interchange beyond that needed to serve the other identified functions, plan amendments and zone changes for expanded commercial development could be allowed consistent with this policy.

Below we’ve outlined specific language changes to the IAMP that would address our concerns:

Page 1-5, 1st paragraph be revised to say – *It is not the ~~primary~~ function of the Coburg/I-5 interchange to serve additional or expanded commercial development within the interchange management area beyond the those uses currently allowed on lands currently in the existing Industrial and Highway Commercial zones ~~a potential of regional commercial development~~*

Page 1-5, Section 1.5, Goals and Objectives, 1st paragraph be revised to say – *The goal of this IAMP is to reflect collaborative work with ODOT, Lane County, and the City of Coburg and outline recommendations for transportation improvements and policy and implementation measures that will maximize the function and operation of the interchange and accommodate future growth as planned for in the 2005 Coburg Comprehensive Plan ~~(as planned for in the Coburg Comprehensive Plan)~~ in the interchange management area.*

Page 1-5, Section 1.5, Goals and Objectives, add an additional bullet to the list following the statement “*Consistent with this policy and consideration of project-specific local transportation issues, the objectives of the Coburg/I-5 IAMP are to*” the following

- *Preserve the long term function of the interchange to serve industrial and highway commercial uses, excluding large scale regional serving commercial uses within the interchange management area that are not highway dependent or related*

Page 6-2, Section 6.1.2 IAMP Policies and Actions, revise Policy #5 to say – *If the City expands its urban growth boundary and updates its comprehensive plan and zoning to ~~fully~~ accommodate its adopted population and employment forecasts after construction of the interchange and local access and circulation improvements described herein as the Recommended Alterative (Alternative B), ODOT will work with the City and Lane County to amend the IAMP, as necessary, to recognize ~~and support~~ those updates provided those updates are consistent with the planned function of the interchange as stated in the Goals and objectives of the IAMP...*

In conclusion, with the above changes to the draft IAMP, we believe your, as well as our concerns regarding the function of the interchange and future land use decisions can be addressed.

Respectfully yours,



Ed Moore, AICP
SWV Regional Representative

Copy to file,

Petra Schuetz, City of Coburg Planning Director
Celia Berry, Lane County Public Works
Stephanie Schultz, Lane County Planning
Darren Nichols, DLCD Community Services Division Manager
Rob Hallyburton, DLCD Planning Services Manager
Robert Cortright, DLCD Transportation Planning Coordinator
Terry Cole, ODOT Region 2 Planning