

T.B.C.

Memorandum Date: July 6, 2009
Ordinance First Reading Date: July 22, 2009
Ordinance Second Reading/Public Hearing Date: August 5, 2009

TO: Board of County Commissioners
DEPARTMENT: Public Works
PRESENTED BY: Celia Barry, Transportation Planning Division
AGENDA ITEM TITLE: In the Matter of Adopting the Coburg/Interstate-5 Interchange Area Management Plan as a Refinement to the Lane County Transportation System Plan and Co-Adopting the Plan as a Refinement to the City of Coburg Transportation System Plan; and Adopting a Severability Clause (File No. PA 09-5027, City of Coburg)

I. MOTION:

For July 22, 2009: Move approval of the first reading and set the second reading and public hearing on Ordinance No. PA 1258 for August 5, 2009, 1:30 p.m.

For August 5, 2009, or a subsequent work session: Move approval.

II. AGENDA ITEM SUMMARY

The Board is being asked to amend a Lane County Rural Comprehensive Plan component by co-adopting with Coburg and the Oregon Transportation Commission (OTC) the Coburg/I-5 Interchange Area Management Plan (IAMP), as a Refinement Plan to the Coburg and Lane County Transportation System Plans (TSP), and as an ODOT Facility Plan. The Lane County TSP is a Special Purpose Plan of the County Comprehensive Plan. An Overlay "Combining" zone will be established to implement the IAMP as part of a subsequent action. The Overlay Combining Zone delineates the area within the IAMP. The IAMP includes lands that are within the Coburg city limits, outside the city limits and inside the Coburg urban growth boundary (ugb), and outside the Coburg ugb on rural Lane County land.

III. BACKGROUND

A. Board Action and Other History

The City of Coburg, Lane County, and the Oregon Department of Transportation (ODOT) have been working on issues related to the I-5 Coburg interchange for over a decade. An earlier version of the Coburg/I-5 Refinement Plan was incorporated into the last Coburg Transportation System Plan (TSP) update, and co-adopted by Lane County by Ordinance PA 1139 on November 10, 1999. Since then ODOT developed rules for IAMPs, requiring one to be in place before an interchange can be constructed or reconstructed. The analysis section describes IAMPs in more detail.

The Coburg and Lane County Planning Commissions held a joint work session and public hearing on January 21, 2009. A hearing notice (Attachment 2) was mailed to all property owners within the proposed IAMP boundary area, plus a buffer area of 300 feet. This meets and exceeds "Measure 56" notice requirements. Attachment 2 contains a copy of the Notice showing the required Measure 56 language. The Commissions jointly deliberated on March 3, 2009 and voted unanimously to recommend adoption by the elected officials (Minutes are in Attachment 3).

The Coburg City Council held a public hearing on April 14, 2009 and unanimously approved adoption of the Coburg IAMP, in a form substantially the same as attached to Ordinance No. PA 1258. The Coburg City Council record is in Attachment 4.

ODOT is working on the construction design in a separate related process, focusing on the Short-Term Improvements discussed in the IAMP, Section 5. These improvements will occur on County and City facilities. To address public involvement requirements in Lane Manual 15.580, on June 24, 2009 ODOT presented a design concept to the Roads Advisory Committee who unanimously recommended that the design be approved. After adoption by the Board of the IAMP, staff anticipates immediately following that item with a request that the Board hold a public hearing and approve the Short-Term Improvements Design Concept.

ODOT has also been working directly with several owners of properties where the project will have an impact, mostly with regard to access management.

B. Policy Issues

The Lane County TSP lists Goals and Policies relevant to this action. The findings attached as Exhibit B to Ordinance No. PA 1258 cover other relevant policies in addition to those referenced below.

Goal 1: Maintain the safety, physical integrity and function of the County Road network through the routine maintenance program, the Capital Improvement Program, and the consistent application of road design standards.

Policy 1-e: Road improvement projects shall consider and, as financially and legally feasible, integrate improvements for alternative transportation modes such as sidewalks, bike lanes, and bus stop turnouts, consistent with adopted road design standards.

Policy 1-f: Maintain County arterial and collector roads sufficiently for the safe and efficient movement of freight, consistent with applicable traffic impact analysis, design policies and standards and land use regulations.

Goal 2: Promote a safe and efficient state highway system through the State Transportation Improvement Program and support of ODOT capital improvement projects.

Policy 2-a: Safe movement of vehicles on the State system and, where allowed, bicyclists and pedestrians shall be a priority. Lane County supports development and implementation of ODOT projects that improve the safety, operation, and structural characteristics of the State highway and bridge system, provided they are consistent with the TSP and applicable federal, state, and local regulations.

Policy 2-b: The County shall coordinate, as appropriate, with ODOT in:

- (i) plan development;*
- (ii) managing the existing State system; and*
- (iii) designing and developing facility improvements on the State system in Lane County.*

Policy 2-d: ODOT safety, preservation and modernization projects on the State system shall be consistent with Policies 2a-c above [c. being not relevant to this item], and need not be identified in the Lane County TSP 20-year Project List.

Goal 6: *Provide safe and convenient opportunities for bicycle and pedestrian travel throughout Lane County.*

Policy 6-f: The County generally will support State projects that include bicycle and pedestrian facilities.

Goal 7: *Promote logical and efficient bicycle and pedestrian connections within the Lane County transportation system and between the County's and other jurisdictions' transportation systems.*

Policy 7-a: In planning and implementing transportation system improvements, Lane County will coordinate with other affected jurisdictions to maximize bicycle and pedestrian route connectivity.

Policy 7-b: The County will look for opportunities to partner with ODOT and City agencies on bicycle and pedestrian facilities when roads of different jurisdictions intersect, in order to provide adequately for bicycle and pedestrians travel to local destinations.

C. Board Goals

The following Lane County Strategic Goals adopted by the Board for 2001-2005 relate to this item:

- *Provide opportunities for citizen participation in decision making, voting, volunteerism and civic and community involvement.*
- *Contribute to appropriate community development in the areas of transportation and telecommunications infrastructure, housing, growth management and land development.*
- *Maintain a healthy environment with regard to air quality, water quality, waste management, land use and parks.*

D. Financial and/or Resource Considerations

The IAMP document must be locally adopted in order for construction of any improvements to move forward. Construction is partially funded by a locally requested federal earmark through the last federal transportation act, SAFETEA-LU, the six year transportation funding legislation covering fiscal years 2004-2009. The SAFETEA-LU authorization extends through September 30, 2009, the end of the current federal fiscal year. Provided obligation (approval by Federal Highway Administration (FHWA) to put the project out to bid) can occur by early 2010, the earmark is most likely to remain in place.

E. Analysis

Please see Section II, Agenda Item Summary, for the nature of the land use action staff is requesting the Board to take. Ordinance No. PA 1258 Exhibit B, Findings, addresses all applicable approval criteria.

The project associated with the IAMP has evolved over time due to a variety of reasons including significant inflation and environmental requirements. It started out as a \$19 million bridge

replacement and is now planned as a multi-phased project that will cost at least \$40 million. Early on the thought was that replacing the bridge over I-5 (which is Pearl Street and Van Duyn Roads, County facilities), would include additional lanes and other improvements to the local system that would address growing traffic problems stemming from increasing industrial activity and truck traffic in this part of town. As the extent of cost increases became apparent ODOT looked at how the project might be changed and phased, to address congestion and safety issues in the near term with the existing funds available, until money for replacing the bridge could be identified.

As you know the industries along Coburg Industrial Way were up until recently primary employers in Coburg, attracting labor from Eugene, Springfield, and other areas. There are two recreational vehicle industries on the north end of the road. At this time one of them, Monaco Motor Homes, is not operating due to the economic recession. Staff understands it was recently purchased by Navistar. Marathon Coach continues to operate at a limited level.

Traffic analysis in the IAMP is based upon fully operating industries. Adoption of the IAMP would be based upon the premise that the economy will rebound and industry will strengthen to its former production and employment levels. In the long term this is a reasonable premise especially given proximity to the Interstate.

As described in the IAMP document, without improvements to the Coburg/I-5 interchange and transportation infrastructure in the interchange area, future peak hour traffic is expected to exceed available road capacity at many nearby intersections, leading to highly congested conditions by 2031. Congestion is expected to affect the I-5 mainline. The interchange ramps are also expected to experience queuing and delay related to vehicles turning onto or from Pearl Street.

Along with congestion, there are safety concerns. Sight distance is limited at the ramp terminals and on each side of the east-west bridge over the interchange, creating truck navigation problems. The bridge structure is narrow, allowing no room for pedestrians, bicyclists, or emergency vehicle passage. Of particular concern to ODOT is the queuing on the northbound interchange off-ramp during the a.m. peak hour where traffic has been known to back up onto I-5, creating a speed differential hazard.

Finally, the height of the bridge is substandard, and larger trucks such as those hauling motor homes must exit off of I-5 and get back on, contributing to in-town congestion, energy waste, and increased pollution.

The IAMP plan describes Short (0-7 years) and Long-Term (8+ years) Operational Improvements and Access Management strategies beginning on page 5-4. Only the short term improvements, including access control, are funded at this time. They are expected to go to construction in 2011 or 2012 following environmental clearances and right-of-way acquisition.

Improvements and access management plans are described in Section 5 and depicted at the end of Section 5 after page 5-11. In brief, short term improvements include adding a dedicated right turn lane on Pearl Street to Coburg Industrial Way for a.m. peak traffic, and a southbound left turn lane to Coburg Industrial Way and extending the two lanes further down the southbound freeway ramp for p.m. peak traffic. Several other improvements concern city streets.

Long term improvements include replacing the east-west bridge with one that meets current height standards, and installing adequate width to add bicycle and pedestrian facilities.

In addition to operational improvements, ODOT intends to purchase access rights and otherwise control access within ¼ mile of the interchange. The IAMP provides a mechanism to identify an area

subject to IAMP access management. Figure 2-1 at the end of Section 2 in the draft IAMP shows the IAMP map and Appendix M contains the legal description. ODOT controls access by purchasing access rights. Alternative access locations are identified or constructed, either prior to interchange improvement construction or when property redevelops. The IAMP document provides specifics on these restrictions and ensures land use development in the area is consistent with long term interchange management goals.

According to ODOT IAMP guidelines, "An IAMP is a joint ODOT and local government long-term (20+ years) transportation and land use plan to balance and manage transportation and land use decisions in interchange areas, and is an important tool in protecting the function of state highway interchanges and the supporting local street network."

Oregon Administrative Rules (OAR) 734-051-0040(34) state, "Interchange Area Management Plan" means a plan for managing a grade-separated interchange area to ensure safe and efficient operation between connecting roadways and to protect the functional integrity, operations, and safety of the interchange. An Interchange Area Management Plan may be developed independent of or in conjunction with an interchange project and may address local street connectivity, local street improvements and local plans and land use regulations. An Interchange Area Management Plan is not an interchange project."

OAR 734-051-0155(2) further provides that, ". . . Interchange Area Management Plans must be adopted by the Oregon Transportation Commission as a transportation facility plan consistent with the provisions of OAR 731-015-0065. Prior to adoption by the Oregon Transportation Commission, the Department will work with local governments on any amendments to local comprehensive plans and transportation system plans and local land use and subdivision codes to ensure the proposed Access Management Plan and Interchange Area Management Plan is consistent with the local plan and codes."

While there are several IAMPs adopted statewide, this IAMP is only the second adopted by OTC for Lane County. The first was for the I-5/Beltline project. Since it didn't involve lands outside the Springfield ugb, nor any county facilities, ODOT did not ask Lane County to co-adopt it. Springfield provided a letter of consistency certifying that all of the elements of the I-5/Beltline IAMP were consistent with their adopted Comprehensive Plan and TSP.

County Public Works, Coburg, and ODOT staff are working on a parallel track to develop the Coburg/I-5 Phase I (Short-Term) design and to put in place an Intergovernmental Agreement (IGA) regarding access management, and facilities maintenance responsibilities.

The ODOT project design team leader is working closely with all affected property owners regarding access changes, trying to arrive at win-win solutions. Absent that, condemnation would be the alternative. It appears that most property owners are finding ODOT proposals to be acceptable, although resolution to all property owners' satisfaction is not expected. Most of the property owner issues are on the east side of the interchange. Additional land use processes, in particular a goal exception, must occur prior to construction of east side improvements and prior to replacement of the bridge.

This adoption is unusual on two levels. First, the improvements and access restrictions that are planned in the short term are all on County and City facilities. As a result ODOT must obtain County design concept approval, and a similar approval process may occur at the City. After your second reading, if the Board adopts the IAMP, County staff will request that you hold a public hearing on the design concept, which the Roads Advisory Committee has already unanimously endorsed (with Mr. Anderson, as an owner of property in the IAMP area, not voting).

Second, the IAMP area straddles two Comprehensive Plans, Coburg's and Lane County's. The area lying outside the Coburg ugb is subject to Lane County Rural Comprehensive Plan land use requirements. The area within the ugb is subject to Coburg's Comprehensive Plan land use requirements, and Lane Code Chapter 10 with regard to those lands inside the ugb and outside the city limits (until they annex). There is one parcel of land in the IAMP area that is within the ugb and outside the city limits.

The entire IAMP area will be subject to the new policy language found in the IAMP, in Chapter 6. The operative policy for developers will be Policy 10, on page 6-3. The policy will restrict new access locations, provide for ODOT purchase of access rights, and provide for closure of private access within the IAMP area along Pearl and Van Duyn streets upon ODOT purchase of access rights. For access-restricted properties within the IAMP, until such time as ODOT purchases access rights, the policy establishes a trip limit on redevelopment of some property, "subject to the limits of county or city codes". This last clause means that the policy cannot, practically speaking, take effect in Lane County's land use jurisdiction until a subsequent action when the County adopts implementing provisions to Lane Code Chapters 10 and 16, and zoning maps showing the IAMP Combining Zone.

Another procedural layer relates to Special Purpose Plans. County adoption of a General Plan/Comprehensive Plan, Lane Code Chapter 12, a "Rural" Comprehensive Plan, and Lane Code Chapter 16, dictates that both Lane Code Chapters 12 and 16 be addressed when adopting Special Purpose Plans in order to apply such plans inside and outside ugbs. In more detail, Lane County adopted a Comprehensive Plan prior to adoption of state land use law, and adopted Lane Code Chapter 12, "Comprehensive Plan" to specify how to implement and amend it. LC Chapter 12 was first adopted in the 1970's or earlier. The first County TSP was adopted in 1980 (a Master Road Plan was adopted in the 1970s). The General Plan Policies document contains Chart One (Attachment 5). As shown in Chart One, Single Purpose Plans may include Metro, rural and small city areas. There are several County Roads within urban areas, not in "Rural" Lane County, in cities, including in Coburg and in the Coburg IAMP, and they are regulated by the County TSP which is implemented by Lane Code and Lane Manual Chapters 15.

As noted, in 1984 Lane County enacted a "Rural Comprehensive Plan" and adopted Lane Code Chapter 16 to implement it and comply with statewide land use law in areas outside of ugbs. LC Chapter 16 specifies that the TSP is a special purpose plan pursuant to Lane Code 16.400(4)(b)(i). This is equivalent to the "Single Purpose Plan" definition in Chart One of the Lane County Comprehensive Plan policies (which later became "Rural" Comprehensive Plan policies, with each respective City having its own Comprehensive Plan, and Eugene-Springfield having a Metropolitan Area Plan, with no overlapping boundaries).

In summary, with adoption of "Single Purpose" and "Special Purpose" provisions in the Comprehensive Plan, the Rural Comprehensive Plan, and Lane Code Chapters 12 and 16, and with the Rural Comprehensive Plan applicable only outside of ugbs, it is necessary to adopt findings of consistency with both Lane Code Chapters 12 and 16 in order for such plans to apply throughout the county, both inside and outside of ugbs, to County facilities. Also, by co-adopting the IAMP with the City of Coburg it becomes a component of the City Comprehensive Plan as well.

The IAMP will not amend the County TSP but will instead be by a Refinement Plan applying only to the IAMP area. Furthermore, as mentioned previously a subsequent plan amendment/zone change action will be necessary to implement the IAMP Combining Zone, including adopting the Zone text, zoning maps, and amending other provisions in the County Comprehensive Plan to provide the necessary mechanics of practical implementation. By adopting the IAMP document as a first step,

the County acknowledges its agreement with the plan to move forward with establishment of the IAMP Combining Zone, and ODOT can move forward with OTC adoption, and with property acquisitions, environmental clearances, and construction of short term improvements.

Finally, a discussion of the necessity of a future statewide land use goal exception (mentioned earlier) is warranted. As illustrated in IAMP Figure 5-1, the southeast quadrant (area south of Van Duyn and east of I-5) contains a proposed new access road to serve several properties there upon redevelopment. As conceived, this new proposed road would be located on rural Agricultural lands outside the ugb. The purpose of the new proposed road is to move ingress/egress away from the Interstate, both for controlling impacts on the Interstate, and because once the new bridge is built, at some time in the future, the grade of the east-west road will be above the property and physical access will be geometrically impractical.

Under state land use law, new roads are allowed on rural lands only to service rural uses or to move traffic off of a state facility (i.e., perform as a frontage road). The properties that will be served by the new road in the southeast quadrant are within the UGB, and the road would not move any traffic off of a state facility. Therefore, approval of an exception to state land use law will be required before the road can be constructed. The exception process is a land use plan amendment process that will come back before the county Planning Commission and Board in another round of public hearings. The exception requirement is further explained in the IAMP, Appendix L.

Any written testimony received will be presented to the Board either in supplementary materials or at the work session. The record for the IAMP is kept in Land Management Division. A binder of the record is in the Board Office. This does not include the Project Management Team materials dealing with the design process or design-associated open houses and property owner meetings.

F. Alternatives/Options

- Option 1. Approve the Ordinance.
- Option 2. Approve a revised version of the Ordinance
- Option 3. Do not approve the Ordinance and deny the application.

IV. TIMING/IMPLEMENTATION

Please see III.D., Financial and/or Resource Considerations information, above. "Obligation" or bid let, is scheduled to occur in 2010 for short-term (Phase I) improvements, once local approvals are complete, environmental clearance is complete, right-off-way is acquired, and FHWA approval is issued.

V. RECOMMENDATION

Staff recommends Option 1. This would be consistent with City co-adoption action and anticipated OTC action.

If Option 2 is chosen, then it will be necessary to re-open discussions with ODOT and the City and determine whether any proposed changes can be supported by the respective jurisdictions. Depending on the significance of any revisions, additional City and County Planning Commission and City Council hearings may be necessary. We anticipate ODOT staff can be present to answer questions at the hearing or a subsequent work session.

If Option 3 is chosen, then there is a likelihood the Coburg/I-5 improvements will not be constructed and the federal earmark will need to be returned.

VI. FOLLOW-UP

Notice of Board action will be provided to DLCD and all interested parties. See Section V. above for additional follow-up information depending on the action taken. Should the Board choose Option 3, an Order with findings setting forth the Board's reasons for denying the Ordinance would be prepared and returned to the Board for a third reading and adoption on a date certain set by the Board.

VII. ATTACHMENTS — AVAILABLE AT FRONT DESK

Attachments/Binder Contents:

Agenda Cover Memo

1. Ordinance No. PA 1258 and Exhibits
 - Exhibit A Coburg Interchange Area Management Plan, April 2009
 - Exhibit B Findings
2. Joint Planning Commission Hearing Notice (meeting Measure 56 requirements)
DLCD Notice of Proposed Amendment
3. Planning Commissions
 3. a. Lane County Planning Commission Memo, July 7, 2009, and Attachments (Re-Approval of minutes for the January 21, 2009 Work Session and Public Hearing in order to fully incorporate edits)
 3. b. Joint Planning Commissions, March 3, 2009 Minutes
 3. c. Joint Planning Commission, March 3 Work Session and Deliberations Materials
 3. d. Joint Planning Commission, January 21, 2009 Work Session and Public Hearing Materials
4. Coburg City Council Record - Minutes, April 14, 2009, and Agenda Item Summary Report and Attachments
5. Chart One, Lane County General Plan/Lane County Rural Comprehensive Plan

BEFORE THE BOARD OF COUNTY COMMISSIONERS OF LANE COUNTY, OREGON

ORDINANCE NO. PA 1258

-) In the Matter of Adopting the Coburg/Interstate-5
-) Interchange Area Management Plan as a Refinement
-) to the Lane County Transportation System Plan and
-) Co-Adopting the Plan as a Refinement to the City of
-) Coburg Transportation System Plan; and Adopting a
-) Severability Clause (File No. PA 09-5027, City of
-) Coburg)

WHEREAS, the Oregon Department of Transportation (ODOT), Lane County, and Coburg are contemplating improvements to state and local transportation facilities near the Interstate 5 Interchange at Coburg to address safety, congestion, and substandard facility issues; and

WHEREAS, Oregon Administrative Rules (OAR) 734-051-0155(2) and (7) requires the ODOT to work with local governments to develop an Interchange Area Management Plan (IAMP) prior to construction of significant modifications to existing interchanges, and that the IAMP be consistent with local plans and codes; and

WHEREAS, the Board of County Commissioners (Board) is in support of constructing the improvements at the I-5/Coburg Interchange, and

WHEREAS, the Coburg/Interstate-5 Interchange Area Management Plan (Coburg IAMP) describes in detail the improvements, and associated ODOT access control management, that ODOT, Lane County, and the City of Coburg are contemplating; and

WHEREAS, adoption of the Coburg IAMP as a refinement plan to the Lane County Transportation System Plan and co-adoption as a refinement plan to the Coburg Transportation System Plan for the area within the jurisdiction of that plan is necessary prior to construction of the improvements; and

WHEREAS, the Board adopted the Lane County Rural Comprehensive Plan with Ordinance PA 883; and

WHEREAS, the Rural Comprehensive Plan describes the hierarchical relationship between that Plan and its components; and

WHEREAS, the Comprehensive Plan for Lane County includes the comprehensive plans for each of the cities within the county and special purpose plans such as transportation system plans; and

WHEREAS, the Board adopted the Lane County Transportation System Plan by Ordinance No. PA 1202, on May 5, 2004, and co-adopted the Coburg Transportation System Plan by Ordinance No. PA 1139, on November 10, 1999; and

WHEREAS, Lane Code 12.050 and 16.400 set forth procedures for amendments of components of the Comprehensive Plan for Lane County; and

WHEREAS, the Lane County and Coburg Planning Commissions reviewed the Coburg IAMP proposal and considered public testimony on January 21, 2009, in a joint public hearing; and

WHEREAS, the Lane County and Coburg Planning Commissions held joint deliberations on March 3, 2009 and the Lane County Planning Commission unanimously recommended to the Board

co-adoption of the Coburg IAMP as a refinement plan of the Lane County and Coburg Transportation System Plans; and

WHEREAS, the Coburg City Council held a hearing on April 14, 2009, and unanimously supported adoption of the Coburg IAMP as a refinement to the Coburg Transportation System Plan; and

WHEREAS, evidence within the record documents that the Coburg IAMP meets the requirements of Lane Code Chapters 12 and 16, and the requirements of applicable state and local law; and

WHEREAS, on August 5, 2009 the Board conducted a public hearing, considered all testimony, and is now ready to take action.

NOW, THEREFORE, the Board of County Commissioners of Lane County Ordains as follows:

Section 1. The Coburg/Interstate 5 Interchange Area Management Plan as set forth in Exhibit "A" attached hereto, and incorporated here by this reference, is adopted as a refinement plan to the Lane County Transportation System Plan and co-adopted with the City of Coburg as a Refinement Plan to the Coburg Transportation System Plan for the area within the jurisdiction of these plans.

FURTHER, although not a part of this Ordinance, the Board of County Commissioners adopts findings in support of this action as set forth in Exhibit "B".

If any section, subsection, sentence, clause, phrase or portion of this Ordinance is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such portion is deemed a separate, distinct and independent provision, and such holding does not affect the validity of the remaining portions thereof.

ENACTED this _____ day of _____, 2009

Pete Sorenson, Chair
Lane County Board of Commissioners

Melissa Zimmer, Secretary
Lane County Board of Commissioners

APPROVED AS TO FORM

Date _____ Lane County

OFFICE OF LEGAL COUNSEL



 *Coburg / Interstate 5 Interchange
Area Management Plan*



Prepared for
**Oregon Department
of Transportation**

Prepared by
CH2MHILL

FINDINGS AND CONCLUSIONS IN SUPPORT OF ADOPTION OF ORDINANCE NO. PA 1258

The Lane County Board of Commissioners ("Board") finds as follows:

1. The Ordinance to which these findings are attached (Ordinance Number PA 1258) adopts a refinement to the Lane County Transportation System Plan (TSP) in the form of a TSP Refinement Plan called the Coburg/Interstate 5 Interchange Area Management Plan (IAMP). The TSP is a component of the Lane County Comprehensive Plan including the Rural Comprehensive Plan ("RCP"). The IAMP is Exhibit A to the Ordinance. All references to the IAMP in this Exhibit B are to Exhibit A to the Ordinance.
2. While policies contained in Chapter 6 of the IAMP become effective upon the effective date of the Ordinance, a subsequent plan amendment and zone change action will be necessary to fully implement the IAMP in Lane County. Subsequent action will include, but may not be limited to, developing text for the IAMP Combining Zone, producing and adopting zoning maps, and drafting and adopting changes to Lane County Comprehensive Plan Goal 2, and a concurrent amendment to Lane Code (LC) Chapter 16.400(4) as specified in Finding 5. below.
3. LC Chapter 12.050(1) and 16.400(6)(h)(i) require amendments to the Comprehensive Plan and Rural Comprehensive Plan to be by ordinance. Adopting Ordinance No. PA 1258 accomplishes this.
4. LC Chapter 12.050(2) provides review criteria to adopt the IAMP.

LC 12.050

(2) The Board may amend or supplement the comprehensive plan upon a finding of:

- (a) an error in the plan; or*
- (b) changed circumstances affecting or pertaining to the plan; or*
- (c) a change in public policy; or*
- (d) a change in public need based on a reevaluation of factors affecting the*

plan;

provided, the amendment or supplement does not impair the purpose of the plan as established by LC 12.005 above.

12.005 Purpose.

The Board shall adopt a comprehensive plan. The general purpose of the comprehensive plan is the guiding of the social, economic, and physical development of the County to best promote public health, safety, order, convenience, prosperity and general welfare.

The amendment does not impair the purpose of the plan because the purpose of the IAMP is to improve circumstances in Lane County with regard to public health, safety, order, convenience, prosperity and general welfare, and all the findings in Exhibit B herein demonstrate how the IAMP accomplishes this.

5. LC Chapter 16.400(6)(h)(ii) requires:

The adoption or amendment shall be concurrent with an amendment to LC 16.400(4), above . . .

As noted in Finding No. 2 above, a subsequent plan amendment and zone change action will be necessary to implement the plan amendment being adopted by PA 1258, including a concurrent change to LC Chapter 16.400.

6. LC Chapter 16.400(6)(h)(iii)(bb) provides criteria similar to LC Chapter 12.050(2), for amendments to the Rural Comprehensive Plan, as follows:

LC 16.400(6)(h)(iii) The Board may amend or supplement the Rural Comprehensive Plan upon making the following findings:

(bb) For Major and Minor Amendments as defined in LC 16.400(8)(a) below, the Plan amendment or component is:

- (i-i) necessary to correct an identified error in the application of the Plan; OR*
- (ii-ii) necessary to fulfill an identified public or community need for the intended result of the component or amendment; OR*
- (iii-iii) necessary to comply with the mandate of local, state, or federal policy or law; OR*
- (iv-iv) necessary to provide for the implementation of adopted Plan policy or elements; OR*
- (v-v) otherwise deemed by the Board, for reasons briefly set forth in its decision, to be desirable, appropriate or proper.*

The IAMP is necessary:

- a. to address projected future changed circumstances related to the use and development of the transportation network in the area of the Interstate 5 (I-5) at Coburg Interchange, including anticipated population growth and new development through the year 2031;
- b. to incorporate nationally accepted engineering practices that have evolved and changed since an earlier version of the I-5 at Coburg Refinement Plan was co-adopted by Lane County in November 1999, by Ordinance No. PA 1139;
- c. to address a change in public need regarding traffic and safety issues, including roadway geometric problems and congestion, transit, and bicycle and pedestrian facilities, and as more specifically described in the IAMP through the year 2031, as a result of the changing circumstances described in a., above; and
- d. to support the Oregon Department of Transportation (ODOT) in the interest of moving actual construction of improvements forward, in complying with the mandate of Oregon Administrative Rules (OAR 734-051-0155(2)), which requires that:

“ . . . Interchange Area Management Plans must be adopted by the Oregon Transportation Commission as a transportation facility plan consistent with the provisions of OAR 731-015-0065. Prior to adoption by the Oregon Transportation Commission, the Department will work with local governments on any amendments to local comprehensive plans and transportation system plans and local land use and subdivision codes to ensure the proposed Access Management Plan and Interchange Area Management Plan is consistent with the local plan and codes.”

7. In addition to the requirements in LC Chapter 16.400(6)(h)(iii)(bb) listed above, additional findings under LC Chapter 16.400(6)(h)(iii)(aa) must be made to adopt the proposed IAMP. Specifically, the Board may amend the Rural Comprehensive Plan upon making certain additional findings, as follows:

LC 16.400(6)(h)(iii) The Board may amend or supplement the Rural Comprehensive Plan upon making the following findings:

- (aa) For Major and Minor Amendments as defined in LC 16.400(8)(a) below, the Plan component or amendment meets all applicable requirements of local and state law, including Statewide Planning Goals and Oregon Administrative Rules.*

LC Chapter 16.400(8)(a), referenced in the above requirement, provides as follows:

LC.400(8)(a) Additional Amendment Provisions. In addition to the general procedures set forth in LC 16.400(6) above, the following provisions shall apply to any amendment of Rural Comprehensive Plan components.

(a) Amendments to the Rural Comprehensive Plan shall be classified according to the following criteria:

(i) Minor Amendment. An amendment limited to the Plan Diagram only and, if requiring an exception to Statewide Planning Goals, justifies the exception solely on the basis that the resource land is already built upon or irrevocably committed to other uses not allowed by an applicable goal.

(ii) Major Amendment. Any amendment that is not classified as a minor amendment.

**

The amendment is a major amendment because it is not limited to a Plan Diagram amendment. The amendment meets applicable requirements of local and state law in that it is being processed as a plan amendment pursuant to LC Chapter 14 requirements, and is subject to the approval criteria of LC Chapter 16, both of which chapters were previously found to be in compliance with state law. Findings of consistency with the approval criteria in LC Chapter 16 are contained herein, including findings of consistency with applicable Statewide Planning Goals and applicable Oregon Administrative Rules, as follows:

Goal 1 - Citizen Involvement. *To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.*

Extensive public involvement was afforded as described in the IAMP Appendix A, Citizen Involvement Plan, and IAMP Appendix B, Findings of Compliance, page 1 incorporated here by reference. Public involvement was also accommodated by a joint public hearing of the Coburg and Lane County Planning Commissions held on January 21, 2009 and by a public hearing of the Coburg City Council held on April 14, 2009.

Goal 2 - Land Use Planning: *To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.*

Adoption of the Coburg IAMP follows the procedures outlined in LC Chapter 16.400, that were acknowledged by LCD, and these findings provide a factual basis for action. Additional findings of consistency with Goal 2 are in IAMP Appendix B, pages 1-2, incorporated here by reference.

Goal 3 - Agricultural Land: *To preserve and maintain agricultural lands.*

Goal 3 is implemented by Oregon Administrative Rule (OAR) 660-033. OAR 660-033-00120, Table 1, identifies transportation facilities and improvements that are permitted on Agricultural lands. Included in the Uses Authorized on Agricultural Lands is, "Transportation improvements on rural lands allowed by OAR 660-012-0065". This is a subsection of the Oregon Transportation Planning Rule (TPR), which likewise, identifies transportation improvements that may be allowed on rural lands consistent with Goal 3. As such the two rules, OAR 660-033 and 660-012 must be interpreted in combination in making findings of consistency regarding Goals 3 and 12 and their associated OARs.

OAR 660-012-0065(1) states, "This rule identifies transportation facilities, services and improvements which may be permitted on rural lands consistent with Goals 3, 4, 11, and 14 without a goal exception." OAR 660-012-0065(3) identifies transportation improvements that are consistent with Goals 3, 4, 11, and 14, including:

(g) New access roads and collectors within a built or committed exception area, or in other areas where the function of the road is to reduce local access to or local traffic on a state highway. These roads shall be limited to two travel lanes. Private access and intersections shall be limited to rural needs or to provide adequate emergency access.

ODOT wishes to limit access within 1,320 feet of the interchange. Commercial property immediately east of I-5 and south of Van Duyn Road currently is served by frontage that is entirely open so that motor vehicles take access immediately adjacent to the I-5 interchange. To restrict access here ODOT must provide alternative access. The recommended alternative in the Coburg IAMP includes a new road intersecting with Van Duyn further to the east, outside of the 1,320 feet distance, that is conceived to be either a private road or local access road. The proposed location of the road is outside the Coburg urban growth boundary (ugb), on Agricultural Land. The IAMP concept is for the road to serve properties within Coburg's ugb in order to eliminate their current access taken from Van Duyn Road close to the Interchange.

The IAMP Appendix L, incorporated here by reference, explains that in order to build this access road on agricultural lands, ODOT must receive approval for a land use exception, because the new road would not serve rural needs or be solely for adequate emergency access, as required under 660-012-0065(3)(g).

Provided ODOT obtains approval of an exception to Goal 3 prior to construction of the above described new road, the IAMP is consistent with the relevant provisions in Goals 3 and 12.

Goal 5 - Open Spaces, Scenic and Historic Areas, and Natural Resources: *To conserve open space and protect natural and scenic resources.*

The IAMP, Chapter 2, Existing Conditions Inventory and Analysis, describes Natural and Cultural Resources within the IAMP area beginning on page 2-26, in Section 2.5. Included in the analysis are findings related to topography, soils, hydrology, flood hazard areas, wetlands, open space and parks, historic resources, and archaeological resources. Prior to construction of the improvements described in the IAMP Section 5 Recommended Alternative, ODOT is required to obtain National Environmental Policy Act (NEPA) environmental clearances. An initial review found that the most relevant concerns with regard to Goal 5 resources involve hydrology, floodplain, and wetlands associated with Muddy Creek to the west of I-5, and Urr Stream to the east of I-5. Additional environmental work addressing these resources must and will be completed and any necessary permits obtained prior to commencement of construction of transportation facilities described in the IAMP. There are no historic structures or environmental overlay zones in the area of proposed improvements contemplated by the IAMP.

Goal 6 - Air, Water and Land Resources Quality: *To maintain and improve the quality of the air, water and land resources of the state.*

The transportation improvements that will be constructed will include storm water facilities that must and will comply with state Department of Environmental Quality (DEQ) and Clean Water Act standards.

With regard to air quality, the IAMP is a planning document for improvements that will be funded with federal dollars. The area where the improvements will occur is within the Central Lane Metropolitan Planning Organization (MPO) area. The Lane Council of Governments, as the MPO for the Eugene-Springfield-Coburg area, must make air quality conformity determinations in order for IAMP improvements to be eligible for federal funding. The Determinations must demonstrate conformance with the federal Clean Air Act and DEQ requirements. Through the air quality

conformity determination process, the IAMP and associated construction achieves compliance with statewide land use Goal 6.

With regard to land resources, Goal 6 requires that waste discharges not exceed the carrying capacity of such resources, or degrade or threaten the availability of such resources. No waste facilities are contemplated by the construction described in the IAMP.

Goal 8 – Recreational Needs: *To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.*

The IAMP, Chapter 2, Existing Conditions Inventory and Analysis, describes Natural and Cultural Resources within the IAMP area beginning on page 2-26, in Section 2.5. Included in the analysis are findings related to open space and parks. A multi-use path is identified in the City of Coburg-adopted Parks Master Plan. The multi-use path is planned for areas that include lands outside the ugb; however, the City Parks Master Plan was not co-adopted by the County, so its location outside the ugb is not recognized by the Rural Comprehensive Plan.

Goal 11 - Public Facilities and Services: *to plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.*

Transportation facilities are identified as public facilities under this goal. Findings of consistency with Goal 11 for both the City of Coburg's Comprehensive Plan and Lane County's Rural Comprehensive Plan can be found in Coburg IAMP Appendix B beginning on page 2. Those applicable to lands outside the Coburg ugb relate to Lane County's Rural Comprehensive Plan and are incorporated here by reference.

Goal 12 - Transportation: *To provide and encourage a safe, convenient and economic transportation system.*

Findings of consistency with Goal 12 for both the City of Coburg's Comprehensive Plan and Lane County's Rural Comprehensive Plan can be found in Coburg IAMP Appendix B beginning on page 3. Those relating to Lane County's Rural Comprehensive Plan are incorporated here by reference.

Findings of consistency with statewide land use Goal 3, Agricultural Lands also relate to consistency with Goal 12 and are incorporated here by reference.

Goal 13 - Energy: *To conserve energy.*

Energy conservation through transportation decisions is derived from reducing congestion and travel times, and providing alternative transportation options to motor vehicle and single occupancy vehicle travel, thereby reducing the use of fuel. The IAMP contains an Existing Conditions Inventory and Analysis in Chapter 2 that evaluates road system deficiencies and traffic operations that contribute to congestion, and evaluates the presence of all transportation modes. The IAMP also includes a "No Build" scenario with regard to these considerations. Analysis concludes that three of five intersections in the study area will not meet mobility standards or will fail if no improvements are made, meaning delays and congestion will increase. The analysis also concludes that the existing bridge width is narrow and does not provide for pedestrians or bicyclists.

The proposed recommended alternative provides for additional turn lanes to smooth the flow of peak hour traffic between the Interchange and the City's Industrial area north of Coburg Industrial Way, and extends the southbound I-5 on ramps. These improvements will reduce congestion and

travel times. The proposal also provides for a future bridge replacement including adequate width for bicycle and pedestrian facilities. IAMP Section 6, policies 12, 13, and 14, provide for plans to expand Lane Transit District (LTD) bus rapid transit to Coburg, to market LTD's Group Pass Program, promote carpool and vanpool services, and monitor the need for a park-and-ride in Coburg. The IAMP therefore considers and recommends improvements and measures that will reduce congestion and provide for alternative modes of travel, encouraging energy conservation.

Goal 14 - Urbanization: *To provide for an orderly and efficient transition from rural to urban land use.*

Findings of consistency with Goal 14 for both the City of Coburg's Comprehensive Plan and Lane County's Rural Comprehensive Plan can be found in Coburg IAMP Appendix B beginning on page 4. The findings are incorporated here by reference.

8. Pursuant to LC Chapter 16.400(6)(h)(iii)(aa) above and OAR 660-012-0025(2), findings of consistency with applicable local policies, including the applicable Rural Comprehensive Plan (RCP) policies are required to adopt this IAMP. Findings of consistency with applicable policies of the Rural Comprehensive Plan follow.

RCP Goal 1: Citizen Involvement

1. . . . assure availability of planning information . . .
2. . . . plan implementation shall include participation by the general public . . .
3. Firmly identified public needs and desires shall be responded to by the County planning process, within the parameters of state and local planning requirements.
4. . . .The Citizen Involvement Program Committee is recognized as the primary body advising the Board as to . . . Because of their regular meeting schedule and expertise, the Planning Commissions have been designated as Lane County's Citizen Involvement Program Committees.

**

Findings addressing statewide planning Goal 1 above demonstrate that the IAMP adoption process is consistent with the above policies, and are incorporated here by reference.

RCP Goal 2: Land Use Planning

**

3. All products of the County Planning process shall be made available for public review and comment and shall be adopted through the hearings process.
16. New rural public facility . . . shall be located inside communities or outside of "communities" or "Unincorporated Communities" in developed and committed areas that were planned and zoned for public facility . . . on April 17, 2002. . .

**

All products proposed for adoption herein have been made available for public review as discussed in findings for statewide planning Goal 1, above, incorporated here by reference.

Transportation facilities are identified as public facilities in statewide planning Goal 11, Public Facilities. A new access road in the southeast quadrant of I-5 @ Coburg Interchange (east of I-5 and south of Van Duyn Road), is proposed as part of the IAMP preferred alternative. The proposed location is outside the ugb on rural agricultural lands. Prior to construction of this improvement, approval of an exception to statewide planning goals, including Goal 3, Agriculture, is required, as discussed in IAMP Appendix L.

RCP Goal 3: Agricultural Lands

**

3. *Reserve the use of the best agricultural soils exclusively for agricultural purposes.*
**
5. *Use planning and implementation techniques that reflect appropriate uses and treatment for each type of land.*
**
8. *Provide maximum protection to agricultural activities . . .*
**

A new access road in the southeast quadrant of I-5 @ Coburg Interchange, east of I-5 and south of Van Duyn Road, is proposed as part of the IAMP Section 5 preferred alternative. The new road location is outside the ugb on rural agricultural lands. Prior to construction of this improvement, approval of an exception to statewide planning goals, including Goal 3, Agriculture, is required, as discussed in IAMP Appendix L.

Findings of consistency for statewide land use Goals 3 and 12 above are incorporated here by reference.

RCP Goal 5: Open Spaces, Scenic and Historic Areas and Natural Resources

No RCP Goal 5 policy statements are directly related to the IAMP. Goal 5 resources are discussed above in findings for statewide land use Goal 5, incorporated here by reference.

RCP Goal 6: Air, Water and Land Resources

Water Quality

**

4. *Lane County shall promote watershed practices which protect and enhance water quality and quantity through land use planning . . .*
5. *Lane County shall cooperate with the . . . Oregon Department of Environmental quality in identifying sources of water pollution and controlling or abating them. . .*
**

The transportation improvements that will be constructed will include storm water facilities that must and will comply with DEQ and Clean Water Act standards.

Air Quality

1. *The County shall support programs which reduce air pollution . . .*
**
4. *The County shall [be] committed to, and shall participate in, programs . . . and ensure that federal, state and local standards are being met . . .*
**

The IAMP is a planning document for improvements that will be funded with federal dollars. The area where the improvements will occur is within the Central Lane Metropolitan Planning Organization area (MPO). In order to be eligible for federal funding, the Lane Council of Governments, as the MPO for the Eugene-Springfield-Coburg area, must make air quality conformity determinations on projects such as the improvements contemplated by this IAMP, in conformance with the federal Clean Air Act and similar statewide requirements. Through the air quality conformity determination process, the IAMP and associated construction achieves compliance with the above policy statements.

Findings of consistency with statewide land use Goal 6, above, are also incorporated here by reference.

RCP Goal 8: Recreational Needs

No RCP Goal 8 policies are directly applicable to the IAMP area because there are no recreational lands identified outside the Coburg ugb in the IAMP area. Findings of consistency for statewide land use Goal 8 above are incorporated here by reference.

RCP Goal 11: Public Facilities and Services

1. Lane County shall provide an orderly and efficient arrangement for the provision of public facilities . . . Designation of land into any given use category either initially or by subsequent plan amendment, shall be consistent with the minimum level of services established for that category.

**

4. Lane County shall maintain an active role to provide the facilities and services needed to make quality health, social and cultural services available and accessible to all Lane County residents . . .

5. Lane County shall participate in the coordination of planning and development for various public facilities and utility services. The primary means of effecting this policy shall be through a system whereby land use application shall be referred to the various providers of services . . .

**

Adoption of the IAMP is a plan amendment that establishes an IAMP area and includes adoption of policies in IAMP Section 6. The policies are based upon a level of service analysis, in IAMP Section 4. A primary reason for the IAMP is to protect the level of service of Interstate 5 and supporting local transportation facilities in this area by requiring land use proposals to adhere to traffic impact analysis requirements, by capping mobility to be consistent with City Comprehensive Plan adopted population numbers and otherwise ensuring level of service is consistent with adopted land use designations, as required by policy 1 above.

Transportation facilities are defined as public facilities under statewide land use Goal 11. By adopting this IAMP, as well as by participating in the Project Management Team assembled by the Oregon Department of Transportation (ODOT) to develop the design of associated improvements, Lane County is maintaining an active role in providing transportation facilities needed to make the referenced services available and accessible to County residents, consistent with policy 4 above. Likewise, by this participation Lane County is participating in the coordination of planning and development for the public transportation facilities that are addressed in the IAMP. Finally, policy 7 in Chapter 6 of the IAMP requires notice to ODOT, consistent with policy 5 above.

Findings of consistency for statewide land use Goal 11 above are also relevant to RCP Goal 11, and are incorporated here by reference.

RCP Goal 12: Transportation

1. Lane County shall strive for a coordinated and balanced transportation system which complies with LCDC Goal 12 and is responsive to the economic, social and environmental considerations, and which will work toward the following objectives:

The IAMP complies with statewide land use Goal 12 as demonstrated in the findings for that Goal contained above in this document, incorporated here by reference. The IAMP is responsive to economic, social and environmental considerations, for the Rural Comprehensive Plan area, as demonstrated in particular by findings relative to statewide land use Goals 5, 6, 9, and 12, incorporated here by reference, and by the following findings.

a. Safe, convenient and economical transportation for all people, materials and services

The IAMP works toward the objectives of safety, convenience, and economical transportation for all people, materials and services by analyzing existing and future traffic trends based upon land uses and anticipated population and employment, and recommending safe, convenient, and economical transportation improvements to address this future scenario.

b. An effective distribution of transportation options.

The recommended alternative in IAMP Section 5 includes bicycle and pedestrian facilities, and IAMP Section 6 policies 12, 13, and 14 promote transit.

c. A transportation system responsive to changing needs and conditions.

Adoption of the IAMP is meant to comply with state regulations and to address changing needs and conditions, and does so by analyzing those changing transportation needs and conditions through the year 2031, developing alternative solutions, and recommending a preferred solution.

d. Consideration of direct and indirect impacts of proposed transportation projects on the environment, energy resources, economy and general livability.

The IAMP considers environment, energy resources, economy and general livability impacts as follows.

Environment – Findings of consistency with statewide land use Goals 5 and 6, and RCP Goal 6, most directly relate to environmental considerations, and are incorporated here by reference.

Energy Resources – Findings of consistency for statewide land use Goal 13, and RCP Goal 13, above, are incorporated here by reference.

Economy – Findings of consistency for statewide land use Goal 9, above, are incorporated here by reference.

General Livability – General livability encompasses environment, energy resources, economy, transportation, public facilities, and other resources. Findings of consistency with statewide land use Goals 5, 6, 9, 11, and 12, and RCP Goals 6, 11, and 12, are incorporated here by reference.

e. Public participation in the transportation planning process.

Findings of consistency with statewide land use Goal 1 are incorporated here by reference.

f. Coordination with the development of statewide comprehensive transportation plans.

IAMP Appendix B contains findings of consistency relative to the Oregon Transportation Plan, the Oregon Highway Plan, OAR 734, Division 51 (Highway Approaches, Access Control, Spacing Standards, and Medians), incorporated here by reference.

g. Encouragement of energy-efficient modes of transportation.

As noted in finding of consistency with statewide land use Goal 13, incorporated here by reference, energy efficient modes of transportation are encouraged.

h. Safe and convenient opportunities for bicycle and pedestrian travel throughout population areas of Lane County.

The preferred alternative described in IAMP Section 5 provides for safe and convenient opportunities for bicycle and pedestrian travel.

i. An efficient public transportation service, which meets demonstrated needs for alternative transportation.

IAMP Section 6 policies 12, 13, and 14 promote transit.

**

2. *In managing the transportation system toward the fulfillment of adopted County land use goals and plans, Lane County shall:*
 - a. *Provide transportation services as necessary to accommodate growth concentrated within existing communities.*

The IAMP analysis, recommended improvements, and policies address anticipated growth within the adopted urban growth boundary concentrated within the City of Coburg through the year 2031.

b. Discourage the spread of residential development in agricultural and forest areas.

The IAMP discourages the spread of residential development through policy language directing the establishment of an alternative mobility standard limiting trip generation on lands within the IAMP to what is consistent with the adopted City of Coburg Comprehensive Plan as to population, ugb location, and existing trip levels. Policies provide for coordination of the IAMP with any future update to the Coburg Comprehensive Plan and Transportation System Plan.

**

- d. *Ensure that transportation improvements are consistent with adopted public policies and plans.*
 - e. *Ensure that road development or improvement is consistent with adopted plan and policies.*

The process used by Lane County to adopt the IAMP includes a thorough discussion of consistency with adopted plans and policies, as demonstrated by the Findings in Exhibit B herein.

3. *Lane County shall seek an efficient, safe and attractive highway network to serve the existing and future arrangement of land uses by striving toward the following objectives:*
 - a. *Make improved safety for the traveling public a primary consideration in the expenditure of resources.*

Safety is a primary concern leading to development of the IAMP. IAMP Section 2 describes existing conditions, including: sight distance at the interchange ramp terminals is limited, and grades approaching the interchange bridge restrict motorist line of sight, creating truck navigation problems. The bridge structure is narrow, allowing virtually no room for pedestrians, bicyclists, or vehicular emergencies. Queuing on the northbound interchange off-ramp during the AM peak hour has been known to back up onto I-5, creating a speed differential hazard. With population increases and anticipated economic growth, this problem will worsen over time.

IAMP Section 5 is a recommended alternative designed to address these safety concerns as well as accomplish other objectives.

b. Ensure that all road construction meets adopted uniform standards unless excepted for substantial reason.

Improvements described in the IAMP pertain to I-5, a state facility, county roads, and city streets. The bridge replacement that will occur in the future must and will meet ODOT height standards relative to I-5. Lane Manual 15.580, Citizen Input With Regard to Individual Road Improvement Projects, specifies a process for review and approval of Design Concepts on County Roads. ODOT's Project Management Team Manager is processing the design concept for county facilities through the Roads Advisory Committee and Board of County Commissioners for their approvals, consistent with Lane Manual. Any deviations from the standards must be explicitly addressed as part of the Design Concept approval process. In addition, ODOT is working with Lane County Public Works, Right-of-Way Management, to obtain a facility permit and ensure Lane County standards are met on county facilities. City facilities are only inside the city limits and need not be addressed in these findings.

c. Provide for timely development of streets and roads in community development centers.

Development of new streets and roads in community development centers are programmed primarily in city Transportation System Plans (TSPs). These findings relate only to lands outside the Coburg urban growth boundary.

d. Include aesthetic considerations in maintenance, construction or improvement within County road right-of-way.

Aesthetics are incorporated into road design standards and the Design Concept approval process described under 3.b. above. These standards and the Design Concept approval process will be the basis of county road improvements that will be constructed as part of the IAMP preferred alternative. It is anticipated that ODOT will incorporate aesthetic considerations into the future bridge replacement as has been done on other, similar projects.

e. Minimize frontage access onto the County's collector and arterial roads.

County collector and arterial roads in the IAMP include Pearl Street, a Minor Arterial, and Van Duyn Street will become a collector after adoption of the IAMP. Access onto Pearl and Van Duyn Street will be limited, in order to protect the function of the I-5 Interchange, as part of the IAMP access management policies contained in IAMP Section 6.

f. Ensure that future route selection considers the indirect costs as well as the direct costs of construction.

Road realignments recommended as part of the IAMP preferred alternative will occur within the Coburg ugb and are therefore not subject to RCP goal compliance. A new road that will be either a private road or public local access road is planned for serving a limited number of properties east of I-5 and south of Van Duyn Road. It will not be constructed until an exception to statewide land use goals is approved. That process must address indirect costs associated with the new road.

h. To the extent possible, coordinate implementation of new highway facilities with land development needs to minimize stimulation of untimely land development.

With regard to IAMP recommended improvements, IAMP Appendix C, page 4, states the following in findings of consistency with statewide land use Goal 14: "While proximity of this [Rural Agricultural] land to the interchange makes it susceptible over time to inclusion inside a UGB, such an action would need to be based upon a demonstration of need and the application of the standards in ORS 197.298". (ORS 197.298 provides requirements for priority of land to be included within an urban growth boundary).

In addition, the IAMP Section 6 includes policies, specifically policies 2, 3, 4, 5, and 6, incorporated here by reference, that provide alternative mobility standards, referral notice, and other measures that limit the influence of the IAMP improvements on land development.

The recommended alternative in Coburg IAMP Section 5 includes a new road that is conceived to be either a private road or local access road, located outside the Coburg urban growth boundary (ugb), on Agricultural Land. The IAMP concept is for the road to serve properties within the Coburg ugb in order to eliminate their current access taken from Van Duyn Road close to the Interchange.

IAMP Appendix L explains that in order to build this access road on agricultural lands, ODOT must receive approval for a land use exception, because the new road would not serve rural needs or be solely for adequate emergency access, as is required by OAR 660-012-0065(3)(g) for new roads in rural areas. Findings regarding the new road and rural-urban issues raised by it are contained in this document, under Goal 3, RCP Goal 3, Goal 12, here under RCP Goal 12, Goal 14, and RCP Goal 14, all incorporated here by reference.

The land that will be served by the new private or local access road is currently developed and inside the ugb. Other lands outside the ugb are subject to Rural Comprehensive Plan policies and associated Lane Code provisions that implement statewide land use law to limit development on rural lands.

i. Ensure that street and highway development or improvement is integrated with and complementary to other transportation modes.

The IAMP includes consideration for all transportation modes as demonstrated in findings for statewide land use Goal 13, and in IAMP Section 2.4., incorporated here by reference.

j. Maintain County roads and bridges adequately to meet the needs of the trucking industry consistent with adopted land use plans for the area.

Accommodation of freight traffic is a priority of the IAMP and a key reason for replacement of the bridge spanning I-5, to make the height adequate for trucks. The bridge consists of County Roads. The IAMP Section 4 Alternatives Analysis includes Freight Movement as an evaluation criterion, in Table 4-5. The Design Concept includes provisions for adequate turning refuges for large trucks.

Land use and land use requirements are discussed and analyzed in detail and carefully considered with regard to proposed transportation improvements in the IAMP. Land Use Impacts are also a criterion of evaluation in Table 4-5.

**

4. *The adopted Lane County Rural Transportation Plan is a special-function Plan concerned with Goal 12 requirements, and containing a number of Goals and Policies regarding various components of the County's transportation system and Goal 12 requirements. The Transportation System Plan, as amended and adopted*

in 2004, shall be applied where appropriate; policies shall be considered to be mandatory actions, which are ultimately binding on the County.

The IAMP, Appendix B, contains findings of consistency for the Lane County Transportation System Plan beginning on page 9, which are incorporated here by reference.

RCP Goal 13: Energy Conservation

**

2. *Lane County shall encourage energy conservation in the development and of public facilities, services and utilities and in the development and use of electrical and communication systems.*

**

The findings above under statewide land use Goal 13 are incorporated here by reference.

RCP Goal 14: Urbanization

RCP Urbanization policies concern management of lands within ugb and outside city limits, annexations, coordination with cities on plan amendments, zone changes, and other matters of urban-rural transition, consideration of ugb expansions, unincorporated communities, and appropriate provision of urban services. The IAMP does not propose any changes to the ugb, annexations, or other urbanization. Findings of consistency with statewide land use Goal 14 for both the City of Coburg's Comprehensive Plan and Lane County's RCP can be found in Coburg IAMP Appendix B beginning on page 4. The Goal 14 findings regarding Lane County's rural lands are incorporated here by reference.

The recommended alternative in the Coburg IAMP includes a new road that is conceived to be either a private road or local access road, located outside the Coburg ugb, on Agricultural Land. The IAMP concept is for the road to serve properties within Coburg's ugb in order to eliminate their current access taken from Van Duyn Road close to the Interchange.

IAMP Appendix L explains that in order to build this access road on agricultural lands, ODOT must receive approval of a land use Goal exception, because the new road would not serve rural needs or be solely for adequate emergency access, as required by OAR 660-012-0065(3)(g). Findings regarding the new road and rural-urban issues raised by it are contained in this document, under Goals 3, 12, and 14, and RCP Goals 3, and 12, and here under RCP Goal 14, all incorporated here by reference.

9. LC Chapter 16.400(9) contains additional amendment provisions for Special Purpose Plans, as follows:

Amendments to Special Purpose Plans may only be initiated by the County. Any individual, however, may request the Board to initiate such amendment. Requests must set forth compelling reasons as to why the amendment should be considered at this time, rather than in conjunction with a periodic Plan update. An offer to participate in costs incurred by the County shall accompany the request.

Ordinance No. PA 1258 is intended as a refinement to the TSP that is not amending any part of the TSP, and therefore is not an amendment requiring findings be made to the above provision in LC 16.400(9). In the interest of thoroughly addressing this provision in case there is a different interpretation of this by any individual, if it were to be considered by the Board to be an amendment to the TSP, it was initiated by the County, and there are compelling reasons to do so at this time, as follows.

First, the Board demonstrated support for adoption of the IAMP by approving the allocation of the required federal match for the construction work that will follow adoption of this IAMP. The match was allocated in the County's Public Works Road Fund Capital Improvement Program (CIP). An allocation was first made in the 2005-2009 CIP, adopted May 12, 2004.

Lane County staff has worked with the ODOT and the City of Coburg since 2004 on development of the IAMP. ODOT briefed the Board of Commissioners on the anticipated IAMP adoption process, on June 5, 2005. ODOT paid the full fee for processing this RCP amendment. The design plans for Phase I are moving forward and adoption of this IAMP is necessary prior to construction of the facilities.

Per OAR 734-05100155(7):

OAR 734-051-0155(7) An Interchange Area Management Plan is required for new interchanges and should be developed for significant modifications to existing interchanges. An Interchange Area Management Plan must comply with the following criteria, unless the Plan documents why compliance with a criterion is not applicable: (a) Be developed no later than the time an interchange is designed or is being redesigned. . . .

The Board anticipates holding a public hearing on the design concept, for that portion applicable to County Roads involved in the project, in early Fiscal Year 2010, after adoption of the IAMP. Federal funds are allocated to the project through the Statewide Transportation Improvement Program. The project is listed in the adopted Central Lane Metropolitan Planning Organization Regional Transportation Plan on the Fiscally Constrained project list.

Construction is scheduled for 2012. Until the County and City approve proceeding with the design concept, which must follow adoption of the IAMP, ODOT cannot proceed with environmental clearances necessary in order to authorize federal funds to proceed with right of way acquisition.

The County's periodic Plan update is unscheduled. Based upon all of the work as described above that must occur following adoption of the IAMP and prior to beginning construction of Phase I, the periodic Plan update would not occur in a timely manner to adopt this IAMP. As such reasons are compelling to adopt this IAMP at this time.

10. Based upon all of the above findings, the Board concludes that the proposed IAMP is consistent with the requirements set forth in the applicable approval criteria. Therefore, the Board approves adoption of the proposal.