



Lane County

Public Works Department / Transportation Planning Division
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W. S. A.

August 31, 2009

Supplement 2: Memorandum for a Work Session on September 16, 2009

- Ordinance First Reading Date July 22, 2009
- Ordinance Second Reading Date/Public Hearing August 5, 2009
- Future Ordinance Third Reading Date/Public Hearing September 23, 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)

On August 5, 2009, the Board of County Commissioners held a public hearing on the Coburg/Interstate-5 Interchange Area Management Plan (IAMP), closed the public hearing, but then later moved and voted to hold a third reading and continue the public hearing for September 23 at 1:30 p.m. On the same date and time, the Board moved and voted to hold a second reading and continued public hearing on the design concept proposed by Order 09-8-5-3, also for September 23 at 1:30 p.m.

You also directed staff to come back prior to the September 23 public hearing for a work session on land use issues, to have representatives present from the Lane County Land Management Division (LMD) Planning Program, the Department of Land Conservation and Development Commission (DLCD), the City of Coburg, and the Oregon Department of Transportation (ODOT).

This memorandum forwards to you materials to inform your discussion, as listed in the Attachments section, below.

Staff also contacted ODOT regarding the question of potential earmark loss, in particular because on August 25, 2009 FHWA issued a Notice regarding "Rescission Of Unobligated Balances Of Contract Authority On September 30, 2009". FHWA is directing all state Departments of Transportation to identify unobligated transportation funds and to forward a list of "round 1" project funds for rescission.

ODOT staff indicate the following:

. . . while the earmark is technically "available until expended," a SAFETEA-LU continuing resolution or new federal bill is needed by the end of September in order to keep federal funds coming to the states. The outcome of this process is likely a resolution, but its nature is unclear at this point. As part of the consideration of a new bill or CR, John [Baker, an ODOT federal liaison] understands that Congress is likely to review unexpended earmarks and as Petra rightly points out and as John confirmed [in email correspondence], rescissions are definitely on the table. Nothing is definite at this time, but our folks who work with this process absolutely believe that additional delay is especially risky at this time.

The above information applies to both the earmark and any additional funds needed from the Statewide Transportation Improvement Program for Phase I improvements.

Attachments

1. Responses to Issues Raised by Board of Commissioners on August 5, 2009
2. Coburg Urbanization Study Abstract about Population Forecasts (EcoNorthwest, 2004)
3. August 31, 2009 LMD Planning Memorandum
4. August 28, 2009 DLCD Memorandum
5. August 31, 2009 City of Coburg Memorandum

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).

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, 2nd 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, 2nd 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.

Coburg Urbanization Study

Prepared for

City of Coburg

by

ECONorthwest

99 W. Tenth, Suite 400
Eugene, OR 97401
(541) 687-0051

Final Report

April 2004

Table 2-4 shows that buildable non-residential land in Coburg, including underdeveloped sites and expansion areas for existing firms, have a capacity to accommodate another 1,920 employees. The level of employment growth in Table 2-4 is within the range of growth forecast by the City's employment growth alternatives for the 2000–2025 period, which is 1,440 to 2,026 (see Figure 2-1). The estimates in Table 2-4 suggest that the level of employment growth in the City's alternatives is still reasonable given current land supply conditions in Coburg.

EVALUATION OF FORECASTS

Population and employment forecasts for small areas or for long periods of time are subject to a high degree of uncertainty. Long-term forecasts for small areas compound this uncertainty. Several factors contribute to the uncertainty of long-term and small-area forecasts:

- Population and employment forecasts for most communities are simple projections of past growth rates into the future. Such a forecast implicitly assumes that the underlying factors driving growth will remain relatively constant. The longer the forecast period, however, the greater the chances that some underlying factors will change in ways that could affect growth. Examples of underlying conditions that could affect population growth in Coburg include public policy, economic conditions, birth and death rates, transportation costs, and consumer preferences for housing.
- Even if planners had a sophisticated model that explicitly included all of the important underlying factors together (which they do not), they would still face the problem of having to forecast the future of these factors. In the final analysis, all forecasting requires making *assumptions* about the future.
- Comparisons of past population and employment projections to subsequent population counts have revealed that even much more sophisticated methods than the ones used in Coburg "are often inaccurate even for relatively large populations and for short periods of time." The smaller the area and the longer the period of time covered, the worse the results for any statistical method.
- Small areas start from a small base. Single unforeseen events in a small community, such as development of a new subdivision, can cause population to significantly diverge from forecast levels. A new subdivision of 100 homes inside the Portland Urban Growth Boundary has a relatively small effect on total population. That same subdivision in Coburg would increase the community's housing stock and population by more than 25%.

⁷Murdock, Steve H., et. al. 1991. "Evaluating Small-Area Population Projections." *Journal of the American Planning Association*, Vol. 57, No. 4, page 432.

- Especially for small cities in areas that can have high growth potential (e.g., because they are near to concentrations of demand in neighboring metropolitan areas, or because they have high amenity value for recreation or retirement), there is ample evidence of very high growth rates in short-term; there are also cases (fewer) of high growth rates sustained over 10 to 30 years.

In this context, there is a wide range of possible population and employment growth levels in Coburg that could be justified by reasonable assumptions about future conditions. Several factors related to Coburg's situation could have a substantial effect on forecast or actual population and employment growth:

- Coburg's proximity to the Eugene-Springfield metropolitan area could generate higher levels of population growth. Table 2-2 shows that Eugene-Springfield is expected to grow by 25,527 between 2005 and 2015 while Coburg is expected to grow by 919 in the same period. If just 1% of growth in Eugene-Springfield went to Coburg instead, growth in Coburg would increase by 255 or 28%. Such a shift in population growth could be driven by economic factors such as housing prices or consumer preferences, or by public policies that encourage growth in Coburg.
- In a similar fashion, attracting a small percentage of employment growth from Eugene-Springfield could significantly increase the level of employment in Coburg.
- Public policies in Coburg to encourage or discourage growth, or that affect the price of land, could result in more or less population growth. All of the City's population growth scenarios assume that sewer capacity will expand to accommodate growth. The City's preferred population forecast includes the assumption that the City will adopt policies to target housing for seniors, workers, and young families, generating population growth in addition to the Base Case forecast. In the future, however, Coburg officials may adopt policies that could result in more or less population growth than forecasted.

Overall, Coburg's preferred population forecast is based on sound methods and reasonable assumptions. Given Coburg's proximity to Eugene-Springfield, substantially higher levels of population growth could be justified with different, but still reasonable, assumptions. And this proximity suggests that lower levels of population growth than forecast are unlikely. ECO uses this population forecast (Alternative A), without modification, as the basis for the housing needs analysis in Chapter 4.

The employment forecast for Coburg is subject to a higher level of variability than the population forecast because employment is more closely tied with changing short-run economic conditions. In addition, the employment forecast is based on an estimate of land supply and assumptions about the number of employees per acre for various land use types. Actual

employment densities, however, will be determined by the types of firms that locate in Coburg. The level of redevelopment in Coburg will vary depending on economic conditions. Differences in the density of employment and amount of redevelopment in Coburg will cause actual employment growth to diverge from the forecast.

The employment growth alternatives developed by Coburg assume that buildable non-residential land in Coburg will be fully developed by 2025. Given the relatively small amount of non-residential land in Coburg and Coburg's proximity to the growing Eugene-Springfield metropolitan area, this assumption appears reasonable. This issue will be addressed further in Chapter 5.

The analysis in this report will present information that will have implications for expected population and employment growth in Coburg. Estimates of the amount of buildable lands in Coburg presented in Chapter 3 could affect the land base used to estimate the capacity for population and employment growth. Estimates of housing need in Chapter 4 could affect the assumptions of housing density used to forecast population capacity in Coburg. Economic opportunities and constraints for development in Coburg presented in Chapter 5 could have implications for potential employment growth. The implications of information presented in Chapters 3, 4, and 5 will be summarized in population and employment forecasts presented in Chapter 6, which will be used to estimate the amount of land needed in Coburg to accommodate expected population and employment growth.

Finally, public policy has a critical role in determining the level of population and employment growth in a community. Local population and employment growth can be influenced by local policies, especially those regarding land use, public facility provision and pricing (taxes and fees), and economic development (incentives). It is contrary to economic theory and common sense to assume, as state policy on population forecasts is often interpreted, that every jurisdiction has a singular growth path that can be specified independent of the policies it might adopt to curb, accommodate, or stimulate growth. The population and employment forecasts used to estimate land needs in Coburg will need to be explicit about the assumptions regarding public policy (i.e., land use, public facility provision and pricing, and economic development) as it pertains to growth in the community.

Moreover, many adjacent lands outside the existing Coburg UGB have Class 1-4 soils and are considered high value farmlands. Based on the *Coburg Crossroads Vision*, it is not the community's desire to grow more than it has determined (the preferred alternative growth forecasts relate directly to wastewater capacity). Little growth can be realized until the wastewater facility is constructed. Finally, Coburg recognizes the importance of the agricultural economy and desires to sustain the agricultural industry by not expanding the UGB any more than is required.

ECO uses this population forecast (Alternative A), without modification, as the basis for the housing needs analysis in Chapter 4. A revised

employment forecast based on input from the Coburg Core Team and Stakeholder Group is presented in Chapter 5 and used as the basis for estimating land needed to accommodate employment.

MEMORANDUM

DATE: August 31, 2009 (memo date)
September 16, 2009 (third reading date)
TO: Celia Barry, Transportation Planning Manager, Public Works
FROM: Stephanie Schulz, Planner, Land Management Division
ITEM TITLE: Procedural Options For The Board In Approving, Modifying, Or Denying
Ordinance No. PA 1258 -- The Coburg Interchange Area Management
Plan (IAMP) As Presented For Co-Adoption By The City Of Coburg

Options/Timing

Option 1. Approve the Ordinance as presented.

Should the Board approve the Ordinance, the action would be completed.

Option 2. Revise the Ordinance as directed by the Board and return for approval of the revised Ordinance for a fourth reading and adoption on a date certain set by the Board.

Should the Board choose Option 2, and propose modification to the text in the IAMP, Coburg City Council would be provided an opportunity to concur with the proposed amendment prior to the Board setting a fourth reading and action to co-adopt the amendment. Under this option, staff could recommend that the fourth reading be set far enough into the future to allow for additional city process before returning it to the Board.

Option 3. Do not approve the Ordinance and deny the application.

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 fourth reading and adoption on a date certain set by the Board. Findings would need to address why the proposal does not meet the approval criteria from the TPR requirements and other applicable laws and regulations.

Development of alternative findings, if necessary, would require direction from the Board on which criteria, specifically, are not met, and a fourth reading on a date certain.

Option 4. Do nothing.

Doing nothing is equivalent to denial of the Ordinance. In this case the IAMP would be effective within the city limits and would also be implemented by the City in their urban growth boundary, but it would not be recognized by the County. In this case the Oregon Transportation Commission (OTC) would be unlikely to adopt the IAMP, and the short term improvements as shown in the design concept you are considering after this item would not be constructed.



Oregon

Theodore R. Kulongoski, Governor

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August 28, 2009

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 or 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 Alternative (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

August 28, 2008

MEMORANDUM

TO: Lane County Board of Commissioners

FROM: City of Coburg

RE: Coburg/I-5 Interchange Area Management Plan (IAMP) And Its Relationship To Coburg's Comprehensive Plan Policies and Land Use Categories

Land Use Designations Inside the Coburg UGB and the IAMP Boundary

At the public hearing for the Coburg/I-5 Interchange Area Management Plan (IAMP) held August 5th, 2009, staff was asked for more specific information about the land uses within the UGB. Within this context, there was also a question related to the order of the planning process and code adoption.

County Code Adoption

Regarding code adoption process, the Coburg City Council adopted the IAMP April 12, 2009 and implemented the recommended code language into its regulatory structure. It is the Lane County code considerations that County Staff has recommended for future adoption into the County Code outside the City UGB. The City Zoning Code amendment has been implemented.

IAMPS Reflect Local Land Use

The Oregon Administrative Rule and Division 51 of the Oregon Highway Plan, state that IAMPs must *reflect* the adopted local land use designations. The IAMP recommendations are adjusted accordingly to accommodate what exists and what is planned to exist in adopted plans. In Coburg's case, the IAMP analysis and final recommendations did not need to go into additional depth with "protective" policies from certain types of land use because the City of Coburg has already codified demand management strategies around the interchange to protect both Coburg's small town character and the regional employment base regardless of the IAMP. This is articulated in more detail in IAMP sections 2.1-2.3. Attachments A and B of this memo are excerpts of Coburg Zoning Code and Comprehensive Plan policies that illustrate this point.

After reviewing the attached code, one might argue, for example, that a 50,000 square foot maximum-sized building footprint is a sizeable commercial development. However, there are additional provisions in the code such as requiring the set aside of 20% of each development over one acre for open space accessible to the public. There are also sight distance protections toward the Coburg Hills, building height limitations, and required transportation demand management integration regulations in place today. In short, there are a number of checks and balances in the Zoning Code to encourage and discourage certain types of development.

Existing Zoning Code

The existing City Zoning Code within the IAMP boundary includes three zone designations: Highway Commercial, Light Industrial, and Traditional Residential. (The Traditional Residential is approximately 30 acres abutting the historic residential area at the westernmost area within the IAMP boundary). Attachment A includes the adopted principal and conditional uses in the current Zoning Code for the commercial uses. These uses clearly revolve around industrial and auto/travel uses, not retail. The code was derived through an extensive periodic review process that was directed by a technical advisory team (including a DLCD representative - Ed Moore's predecessor Margarite Nabeta - who was also a member of the technical advisory team for the IAMP); an exhaustive public outreach effort which spanned three years; and data provided by the 2004 Urbanization Study (EcoNorthwest) which informed the City regarding how much and what type of land uses were needed to accommodate a 20-year growth forecast. The designations were applied as such. The community was, and continues to be, a strong proponent of smart, compact growth that will protect the small town, historic character of Coburg and support the regional employment center.

Existing Comprehensive Plan Policies

Coburg Comprehensive Plan policies also provide specific direction for land use within the interchange area. Attachment B highlights a number of these. Goal 9 - Economic Development and Goal 12 – Transportation policies specifically contribute different aspects of protection from “big box retail” around the interchange.

IAMP Before Consideration of Future UGB Expansion

Coburg Comprehensive Policy 36 of Goal 12 states, [The] *City shall not expand the UGB east of Interstate 5 until the City has sufficient clarity on the configuration, timing, and cost of the interchange upgrade to conclude that adequate transportation facilities will be in place to serve future development.* This policy was crucial in deciding what order the City should pursue their planning work. There was recognition that the IAMP was the appropriate tool (as well as the required tool) to develop sufficient clarity about interchange reconstruction.

Cities Determine Land Uses

The City land use work was completed prior to the IAMP project. The land uses do not allow the type of retail that DLCD mentions. However, it is important to note that while the community's vision for the interchange area is aligned with the DLCD comment in the submitted letter, the IAMP may not direct the City to apply or prohibit any specific

land use. A land use alteration requires comprehensive public involvement, support of an updated urbanization study, and comprehensive plan amendment process. Again, the IAMP must reflect the local plans, it may not change land uses within a particular area.

The IAMP Complies with State and Local Requirements without Further Amendment

The legal findings that address the compliance of the land use designations for the IAMP can be found in Appendix C: Findings of Compliance with Applicable State and Local Plans, Policies and Regulations. More detail regarding the supporting policies that already exist in the Comprehensive Plan can be found in Appendix B: Memo #1, Plans and Policy Review. This crucial portion of the project was derived during Task 3 and involved a thorough review and analysis of all relevant state, regional and local planning documents in order to establish a planning process and policy framework.

Staff is eager to address any additional questions at the September 15, 2009 work session.

CC: Stephanie Schulz, Lane County Public Works Land Use Division
Celia Barry Lane County Public Works Transportation Division
Mark Bernard, Lane County Public Works Transportation Division
Terry Cole, Oregon Department of Transportation Region 2
FILE

ATTACHMENT A

CURRENT COMMERCIAL DISTRICT REGULATIONS WITHIN THE INTERCHANGE AREA MANAGEMENT AREA

COBURG ZONING CODE ARTICLE VII DISTRICT REGULATIONS

D. Highway Commercial District (C-2)

1. Purpose

The purpose of the C-2 District is to provide goods and services that primarily serve the traveling public and regional market. The C-2 District is intended to promote a high quality of life through a diverse economy and strong tax base, transition between higher and lower intensity uses, and appropriately scaled commercial uses that fit the small town, historic character of the community.

2. Uses and Structures

- a. Permitted Principal Uses and Structures, provided the total ground floor space does not exceed 50,000 square feet of gross floor area per building.
 - (1) Commercial retail and service businesses, including automobile-related and automobile-dependent uses.
 - (2) Commercial uses requiring outdoor storage, display, or customer service areas, such as vehicle sales, rental and repair, retail lumberyards, greenhouses, and retail building supply.
 - (3) Institutional uses, including religious, human care, educational and social institutions and public and semi-public buildings.
 - (4) Offices for professional services, professions and administrative uses.
 - (5) Service and gasoline stations in compliance with Section VII.D.14
 - (6) Eating Establishments
 - (7) Existing agricultural, horticultural and livestock uses (no new uses after September 30, 2005).
 - (8) Existing manufactured dwelling parks, mobile home parks, and other residential uses (no new residential uses), except per subsection (12).
 - (9) Existing warehouse and wholesale distribution uses (no new uses after September 30, 2005).
 - (10) Residential structures and uses for on-site security and/or management personnel in conjunction with and as part of another permitted use, up to 1,000 square feet total floor area.
 - (11) Residential uses, provided they are part of a mixed-use building and all residential uses are on an upper floor (no ground floor residential use).
 - (12) Transportation facilities, consistent with the City's Transportation System Plan.
- b. Permitted Accessory Uses and Structures

Customary accessory uses to the permitted and conditional uses in subsections a. and c., provided that structures must be in compliance with the Uniform Building Code and may require a building permit

- c. Special Exceptions (Conditional Uses). The following uses are permitted with a conditional use permit pursuant to Article X, provided the total ground floor space does not exceed 50,000 square feet of gross floor area per building.
 - (1) Commercial recreation facilities including indoor theaters, bowling alleys, indoor skating rinks or similar uses that are conducted wholly within a fully enclosed building that is set back at least 75 feet from any property line shared with the Residential District.
 - (2) Ambulance service.
 - (3) New warehouse uses located on the south side of Delaney Street as noted in City Resolution 90-14.
 - (4) Truck stops on parcels or lots that do not share more than 75 feet of a property line with the Residential Zone.
 - (5) Increase in building height, as provided in subsection 5, below.

3. Lot Requirements

a. For parcels not served by public sewer:

- (1) The minimum lot area shall be 10,000 square feet.
- (2) The minimum average lot width shall be 100 feet.
- (3) A maximum of 60 percent of the lot may be covered by all buildings.

b. For parcels served by public sewers:

- (1) No minimum lot area or width is required.
- (2) The maximum allowable lot coverage is 80 percent. The maximum allowable lot coverage is computed by calculating the total area covered by buildings and impervious (paved) surfaces, including accessory structures but not including pedestrian pathways. Compliance with other sections of this code may preclude development of the maximum lot coverage for some land uses.
- (3) A minimum of 15 percent of the total area of the site shall be landscaped in accordance with Article VIII, Supplementary District Regulations.

4. Yard Setbacks (measured from the building foundation to the respective property line.)

- a. Front Yard setbacks shall be a minimum of 5 feet and a maximum of 20 feet. No parking or loading areas shall be located within the front yard setback.
- b. Interior Side Yards and Rear Yards: 10 feet minimum.
- c. A 25-foot horizontal buffer zone shall be required between development and

any adjacent Residential District. This buffer is in addition to any required yard setbacks. This area shall provide landscaping to screen parking, service and delivery areas, and walls without windows or entries. The buffer may contain pedestrian seating any pedestrian pathways shall not contain any off-street parking, or storage of equipment, materials, vehicles, etc. Landscaping shall be in accordance with Article VIII.H of this Code.

- d. Water quality treatment areas may be provided within setback yards, subject to City approval.
 - e. Additional setbacks on public street frontages may be required to provide for planned widening of an adjacent street, consistent with the City's Transportation System Plan.
 - f. All developments shall meet applicable fire and building code standards, which may require setbacks different from those listed above.
 - g. Construction of pathways and fence breaks in yard setbacks may be required to provide pedestrian connections to adjacent neighborhoods or uses, or other districts, or public pathways, consistent with the City's Transportation System Plan, Parks Plan or other applicable Comprehensive Plan policies and Zoning Code provisions.
 - h. Additional setbacks on public street frontages may be required to provide for planned widening of an adjacent street, consistent with the City's Transportation System Plan.
 - i. All developments shall meet applicable fire and building code standards, which may require setbacks different from those listed above.
5. Maximum Height Standards
- a. The maximum structural height shall be 35 feet.
 - b. As provided in subsection 2.c (conditional use), a building may exceed this height limitation up to a total height of 45 feet when the new building does not abut a Residential District or an existing residential use.
6. Compliance with Design Standards and Guidelines
- a. All uses, structures and development in this district are subject to the applicable design and development standards in Article VIII, Supplementary District Regulations.
7. On-Premise Signs
See Sign Ordinance for requirements.
8. Parking and Access Requirements
See ARTICLE VIII Supplementary District Regulations.
9. Off-Site Signs

See Sign Ordinance for requirements.

10. Vision Clearance.
See Article VIII Supplementary District Regulations.

11. Street Standards

New development shall conform to the City's Street Standards, as adopted in the Transportation System Plan and set forth in Article VIII.

12. Building Orientation

- a. The primary entrance to a building shall be oriented to the street. "Oriented to the street" means that the building entrance faces the street, or is connected to the street by a direct and convenient separate pedestrian pathway not exceeding 60 feet in length. Streets used to comply with this standard are public streets or private streets that contain sidewalks and street trees.
- b. Building entrances on or within 30 feet of a public or private street shall connect to the street system and transit facilities through separated pedestrian pathways that comply with the federal Americans With Disabilities Act (ADA) and City regulations.
- c. When the only street abutting a development is an arterial street, the building's entrance(s) may be oriented to an internal drive when impractical to orient towards the street. The internal drive or street shall have a raised, ADA-compliant pathway connecting the building entrance(s) to the street right-of-way.
- d. No loading or delivery areas shall be located adjacent to the Residential District.

13. Building Design Standards

- a. All new commercial buildings shall have exterior wall articulation every 20 horizontal feet and shall include varied exterior treatment, e.g., varied materials, painting, etc. along the entire façade.
- b. All new commercial buildings shall have display windows on the primary frontage, occupying at least 50% of horizontal linear dimension of wall and located not more than three (3) feet above the finished grade. Display windows shall be recessed in the wall a minimum of three (3) feet, and their contents shall be visible through transparent glass. Windows mounted on the exterior façade, non-transparent glass, and non-glass materials covering the inside or outside of any portion of the display window are prohibited.

14. Standards for Service Stations

In addition to meeting the design and development standards in Article VIII, Service Stations shall comply with the additional standards below:

a. Locational Standards

- (1) Service stations in retail commercial shopping centers or as part of

another commercial development shall be adjacent to a public street. Vehicular access to the station may be from an internal drive or private street rather than directly from a public street.

- (2) At the time the service station use is established, the site shall not share any property line with an existing residential use or the Residential District.
- (6) The minimum distance from the site to the Residential District, or an existing residential, school, park, playground, church, or museum use, shall be 200 feet.
- (7) The minimum distance between service station sites shall be 400 feet, except at intersections.
- (8) Not more than two (2) service stations shall be located at any given intersection. When two service stations are proposed to be located within 400 feet of an at-grade intersection, they shall be situated on diagonally opposite corners.
- (9) New service stations on the same side of a street or highway shall be no closer than 1,500 feet to any part of any existing building on another service station site. This shall not prevent major renovation of existing structures in accordance with this Code.

b. Site Design

- (1) A minimum of fifteen (15) percent of the service station site shall be landscaped in accordance with Article VIII. Existing specimen trees, mature ornamental shrubs, and ground cover shall be preserved whenever possible.
- (2) Perimeter Buffering
 - (a) A fence, hedge or wall shall be erected on all interior property lines.
 - (b) Such a fence, hedge or wall shall be a minimum of five (5) feet and a maximum of seven (7) feet in height, except within 40 feet of street rights-of-way, where it may be no higher than three (3) feet in height.
 - (c) No portion of any fence, hedge or wall shall be within 15 feet of a street right-of-way.
 - (d) The fence, hedge or wall shall screen 70 percent of the view between the service station and adjacent property.
 - (e) These perimeter buffering requirements does not apply to service stations built as part of a shopping center or other commercial development, or where the service station site shares a property line with another commercial use or development.
- (3) Each landscaped and planted area shall be serviced by an underground irrigation system that is remotely operated, unless the applicant submits professional certification that the proposed plant species are drought-tolerant for Coburg's climate and the site conditions. Planted areas must remain living after planting and shall be continuously maintained by the property owner. If the vegetation fails to survive or is otherwise not maintained in good condition, the property owner shall

replace them with an equivalent species and size within 180 days.

c. Access

- (1) A service station shall be permitted not more than two curb cuts for each arterial street frontage under City jurisdiction.
- (2) Access on County roads and State highways shall be determined by Lane County and the Oregon Department of Transportation, respectively.

d. Signs

See Sign Ordinance for requirements.

e. Exterior Lighting

- (1) Freestanding lighting fixtures shall not exceed a height of 20 feet.
- (2) Lighting fixtures shall be shielded and not shine or glare off the property.

f. Operations

- (1) All service stations must comply with all applicable state and federal rules and regulations.

E. Light Industrial District (LI)

1. Purpose

The purpose of the LI District is to provide areas for manufacturing, assembly, packaging, wholesaling, related activities, and limited commercial uses that support local industry and are compatible with the surrounding commercial and residential districts. The LI District is intended to promote a high quality of life through a diverse economy and strong tax base, transition between higher and lower intensity uses, and appropriately scaled non-polluting industrial uses that fit the small town, historic character of the community.

2. Uses and Structures

a. Permitted Principal Uses and Structures

- (1) Commercial and Service.
 - (a) Office(s) provided the office(s) are integral to a primary industrial use (e.g., administrative offices).
 - (b) Retail and service commercial uses up to 5,000 square feet in gross floor area per (e.g., convenience markets, restaurants, banks, dry cleaners, retail sales of products made on-site, and similar uses).
- (2) Manufacturing and Assembly, and Associated Sales of products

manufactured or assembled on-site.

- (a) Boat building and repairs.
- (b) Cabinet and sash and door shop.
- (c) Electrical and electronic equipment.
- (d) Food products, except the rendering or refining of fats or oils and meat packing plants.
- (e) Furniture manufacture and assembly.
- (f) Ice.
- (g) Paint shop.
- (h) Plumbing supplies.
- (i) Pottery.
- (j) Soft drinks.
- (k) Trailers, campers and recreational vehicles.
- (l) Upholstery.
- (m) Vehicle maintenance and repair facilities.
- (n) Recreational vehicles sales lots, including sales of vehicles manufactured off-site.

(3) Processing.

- (a) Greenhouses.
- (b) Laundry cleaning and dyeing plants, including rugs and carpets.
- (c) Printing and publication.

(4) Utilities.

- (a) Distribution plant.
- (b) Service yard.
- (c) Substation.

(5) Wholesaling, warehousing and storage not exceeding 250,000 square feet.

- (a) Building material storage yards.
- (b) Cold storage.
- (c) Contractor's storage yard.
- (d) Distribution agencies.
- (e) Household and consumer goods.
- (f) Vehicles, boats, aircraft.
- (g) Warehousing of manufacturing products.
- (h) Wholesale businesses and sales room.
- (i) Storage.

(6) Agricultural, horticultural, and livestock uses that were legally established prior to [September 30, 2005].

(7) Other

- (a) Accessory buildings and uses normal and incidental to the uses permitted in this district.

- (b) Animal hospitals and clinics.
 - (c) Public parking areas and structures.
 - (d) Residential structures and uses for on-site security and/or management personnel in conjunction with and as a part of a Light Industrial District permitted use not exceed 1,000 square feet in total area.
- (8) Transportation facilities, consistent with the City's Transportation System Plan.
- b. Special Exceptions (Conditional Uses). The following uses require a conditional use permit in accordance with Article VIII, conditional use procedures and criteria:
 - (1) Public and semi-public buildings--including, but not limited to, fire stations and reservoirs--essential to the physical, social and economic welfare of an area.
 - (2) Service stations (See standards in ARTICLE VII.C).
 - (3) Stone yards and marble works.
 - (4) Agricultural, horticultural, and livestock uses that were legally established prior to September 30, 2005.
 - (5) Wireless communication equipment, including radio (i.e., cellular), television and similar types of transmission and receiving facilities, in conformance with the Federal Telecommunications Act of 1996 and the provisions of Article X.B.13.
 - (6) Other
 - (a) Resource extraction, including, but not limited to, the operation of mineral and aggregate quarries. The conditional use permit shall include an approved site reclamation plan, submitted by the applicant, which complies with applicable requirements of State natural resource regulatory agencies.
 - (9) Increase in building height, as provided in subsection 3, below.

3. Maximum Height Standards

The maximum structural height shall be 35 feet, except as follows:

- a. Increased height may be approved for Wireless Communication facilities, subject to the provisions of Article VIII, Section J.

4. Lot Requirements

For parcels not served by public sewer:

- a. The minimum lot area shall be 10,000 square feet.
- b. The minimum lot width shall be 100 feet.
- c. A maximum of 60 percent of the lot covered by all buildings.

For parcels served by public sewers:

- (1) The maximum allowable lot coverage is 80 percent. The maximum allowable lot coverage is computed by calculating the total area covered by buildings and impervious (paved) surfaces, including accessory structures but not including pedestrian pathways. Compliance with other sections of this code may preclude development of the maximum lot coverage for some land uses.
 - (2) A minimum of 15 percent of the total area of the site shall be landscaped in accordance with Article VIII, Supplementary District Regulations.
5. Yard Setbacks (measured from the building foundation to the respective property line.)
 - (a) Front Yards: 20 feet minimum; within which there shall be landscaping that conforms to the provisions of Article VIII. Front setback yards may contain roof overhangs (roof drains required), awnings, canopies, pedestrian seating and pedestrian pathways but shall not contain any storage of equipment, materials, vehicles, etc. Landscaping shall be in accordance with Article VIII.H of this Code.
 - (b) Side and Rear Yards Adjacent to Streets: See Front Yards.
 - (c) Interior Side Yards and Rear Yards: 10 feet minimum
 - (d) Where an industrial use abuts a residential district, a 25 foot setback is the minimum area that shall be required between any development and any adjacent Residential District. Additional setback up to 200 feet may be required where the proposed activity would have a significant impact on adjacent residential property in the form of noise, dust, smoke, vibration or other negative impact that is perceptible beyond the property boundaries. A 25-foot landscaped horizontal buffer zone shall be required between development and any adjacent Residential District. This buffer shall be included within any required yard setbacks. This area shall provide landscaping to screen buildings, parking, and service and delivery areas. The buffer may contain pedestrian seating and pedestrian pathways but shall not contain any off-street parking, or storage of equipment, materials, vehicles, etc. Landscaping shall be in accordance with Article VIII.H of this Code.
 - (e) Water quality treatment areas may be provided within setback yards, subject to City approval.
 - (f) Construction of pathways and fence breaks in yard setbacks may be required to provide pedestrian connections to adjacent neighborhoods or uses, or other districts.
 - (g) Additional setbacks on public street frontages may be required to provide for planned widening of an adjacent street, consistent with the City's Transportation System Plan
 - (h) All developments shall meet applicable fire and building code standards, which may require setbacks different from those listed

above.

6. Compliance with Design Standards and Guidelines
 - a. All uses, structures and development in this district are subject to the applicable design and development standards in Article VIII.

ATTACHMENT B

COBURG COMPREHENSIVE PLAN POLICIES **Applicable Within the Interchange Area Management Plan**

Goal 9: Economy of the City

LCDC Goal: “To diversify and improve the economy....”

Coburg Objective: To guide community development in such a way that the local economy is improved while maintaining Coburg’s small town atmosphere.

General

Policy 1: The City will program the facilities and services necessary for an appropriate level of economic diversification, and will, develop a Capital Improvements Program and Community Facilities Plan.

Policy 2: Lands for the expansion within the City, of business (commercial and industrial activities), will be provided to the extent necessary to meet local employment needs, to accommodate the identified regional needs, to provide an adequate tax base, and to support future population growth.

Commercial

Policy 3: Compatible with maintaining a rural small business community, land suitable for a full range of retail, professional and service uses will be provided in the downtown area. Civic, social and cultural functions serving the community at large are also deemed appropriate in the downtown area.

Policy 4: A “Highway Commercial” district will be located adjacent to the I-5 interchange. The purpose of the Highway Commercial Plan designation is to provide goods and services that primarily serve the traveling public. Uses in this area will preserve the small town and historic character of Coburg, by having compatibility in architectural design and scale with the Central Business District and/or Residential designations. Development of the Highway Commercial District shall be considered secondary to the development of the downtown area, however.

Policy 5: Business and commercial uses will provide off-street parking and loading areas to accommodate associated vehicles as specified in the Zoning Ordinance.

Industrial

Policy 6: An adequate amount of level, buildable land which has good access to arterial streets shall be provided within existing city limits to meet local and regional industrial needs.

Policy 7: A buffer, subject to conditions of the Zoning Code, shall be required along the boundary of all industrial areas that abut a residential district or shall be used to act as a buffer between the two districts or conflicting uses. Setback requirements of the Zoning Code shall also reflect buffering needs.

Policy 8: Industrial uses shall be grouped together within well-designated industrial parks or subdivisions so as to promote:

- A pollution free environment;
- The highest aesthetic standards possible;

- Minimum impact on adjacent lands;
- Development within the constraints of the natural environment; and
- Compliance with LCDC Goals and Guidelines.

Policy 9: Public facilities, including water, streets and fire and police protection, already exist which are capable of meeting the needs of expanded commercial and industrial development within the Urban Growth Boundary.

Jobs and the Economy

Policy 10: The City shall promote a diverse economy that continues to support a strong tax base for the community.

Policy 11: The City shall promote quality of life and compatibility of commercial and industrial uses with the small town, historic character of the community.

Policy 12: The City shall coordinate with state and regional economic development organizations to ensure the City's goal of economic diversity is considered in business recruitment strategies that affect Coburg.

Policy 13: The City shall foster a business environment and land use system that meet a variety of residents' needs for goods and services, to reduce daily travel to Eugene, while maintaining Coburg's small town character.

Policy 14: The City shall encourage environmentally friendly, low-polluting industries.

Policy 15: The City shall support existing businesses.

Policy 16: The City shall support efforts to create high-wage jobs in Coburg by the following:

- a. Coordinate with other economic development organizations to develop a coherent and effective marketing program
- b. Develop incentives to retain and expand existing firms
- c. Maintain and enhance Coburg's image as a community

Policy 17: The City shall diversify employment base by the following:

- a. Provide developable land necessary to accommodate economic growth
- b. Research and develop policies that discourage big-box retail and strip commercial uses.

Policy 18: The City shall coordinate economic development activities by the following:

- a. Develop City institutional strategy for a City economic development process.
- b. Coordinate with the School District.

Policy 19: The City shall support businesses in Coburg by the following:

- a. Sustain and enhance business skills and management training available in Coburg.

b. Coordinate and support other organizations to sustain and expand workforce services available in Coburg.

c. Improve information about and access to programs available through the Oregon Economic and Community development department, Small Businesses Administration, and other agencies.

GOAL 12: Transportation

Policy 36: The City shall not expand the UGB east of Interstate 5 until the City has sufficient clarity on the configuration, timing, and cost of the interchange upgrade to conclude that adequate transportation facilities will be in place to serve future development.

Policy 37: The City shall ensure that developments along high capacity transportation corridors are reasonably transit-oriented and compatible with the city's character.

Policy 40: The ~~exception~~ area immediately east of Interstate 5, when included within the urban growth boundary and city limits, shall have a process for transportation review criteria placed on the property to assure that any new development or redevelopment on the property that increases trip generation from the site is required to go through a plan amendment application with the city and will be required to address the requirements of Section 0060 of the TPR regarding impacts to state, county, and city transportation facilities. The property owner or applicant may be required to complete a traffic impact analysis, road dedications, and road improvements for affected County Roads, consistent with the Lane County Transportation System Plan goals and policies and with County requirements for roads in Lane Code 15.

Policy 41: The ~~exception~~ area immediately east of the Interstate 5 interchange shall have an established trip generation baseline upon annexation of the property. The trip generation baseline shall be for average daily trips (ADT), weekday AM peak and weekday PM peak trips, based on ITE Trip Generation Manual and inventory of uses is as shown in Exhibit 2 and is incorporated as policy by reference.

Policy 42: All new development proposals and/or redevelopment proposals in the exception area immediately east of Interstate 5 that exceed the baseline trip generation established upon annexation shall be required to apply for a city plan amendment application and meet Statewide Goal 12, Transportation Planning Rule, in particular Section 0060, and develop a transportation analysis to determine the impact on the interchange and on County Roads. The County may require a traffic impact analysis and road improvements consistent with the Lane County Transportation System Plan goals and policies and with County requirements for roads in Lane Code 15. The new site development or redevelopment shall be required to measure the following trip impacts for all three of the following:

- Weekday PM peak hour trips between 4:00 pm and 6:00 pm
- Weekday AM peak hour trips between 6:00 am and 9:00 am
- Average Daily trips for the entire area in question.

Policy 43: In the event that Interchange Refinement Plan is completed and adopted in the Coburg TSP or Interchange Area Management Plan is developed and adopted, the ~~exception~~ areas immediately east of

Interstate 5 shall be included in the plans and shall be governed by the results of that plan.

Notwithstanding this provision, a traffic impact analysis, road dedications and road improvements may be required for new development affecting County roads in this area.