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## 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 No. PA 1258) adopts a refinement to the Lane County Transportation System Plan (TSP) in the form of a TSP Refinement Plan called the Coburg 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 the IAMP attached as 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 actions 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 or supplements 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:*

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*(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 (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 or supplement 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.*

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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.*

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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 LCDC, 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.

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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**

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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. . .*

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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***

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*3. Reserve the use of the best agricultural soils exclusively for agricultural purposes.*

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*5. Use planning and implementation techniques that reflect appropriate uses and treatment for each type of land.*

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*8. Provide maximum protection to agricultural activities . . .*

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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*

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*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. . .*

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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 . . .*

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

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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.*

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*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 . . .*

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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.

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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.

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- 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.

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- 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***

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- 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.*

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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 adopts the IAMP as a refinement to the Lane County and City of Coburg TSPs and the ordinance is not amending any part of the TSPs. Therefore, this is not an amendment under LC 16.400(9) for which findings are required. In the interest of thoroughly addressing this provision in the event that adopting the IAMP is later interpreted to be an amendment to the Lane County TSP, it would constitute an amendment initiated by the County for which there are compelling reasons to take such action at this time, as discussed below.

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 proposal to supplement the Lane County TSP, a component of the RCP. The design plans for Phase I are moving forward. The facilities are necessary in order to address safety and congestion issues, as described in the IAMP, Section 1.2, Problem Statement, incorporated here by reference. The IAMP must be adopted prior to construction as described under 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 has not scheduled a periodic Plan update of either the RCP or the Lane County TSP. The work described above must occur following adoption of the IAMP and prior to beginning construction of Phase I, and a periodic Plan update to adopt this IAMP could not be processed in time to meet the described work schedule.

For the reasons discussed above, there exist compelling reasons to adopt the Coburg 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 concludes the evidence and findings support adoption of the proposal.