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Date: March 3, 2004

From: Rob Zako, Transportation Advocate

To: Metropolitan Policy Committee

CC: Marguerite Nabeta
Bob Cortright

Re: Draft FY2004–2005 Unified Planning Work Program

Dear Metropolitan Policy Committee,

Thank you for this opportunity to comment on the Draft FY2004–2005 Unified Planning Work Program (UPWP).

We appreciate that the adoption schedule is less rushed compared to the last time around. We also appreciate that staff has made the draft available in a legislative format showing proposed changes to the current UPWP.

As you know, the federal requirement for an MPO to adopt a UPWP is intended to provide an opportunity to look at the “big picture” of all the metropolitan area’s transportation-related planning activities (that are federally funded or regionally significant). The policy questions to ask are: What are the funding priorities? Do the different planning activities work together? Are there important activities that aren’t scheduled (or activities that are scheduled that perhaps shouldn’t be)?

Here we will comment on just two elements of the draft UPWP.

Integrated Land Use and Transportation Plan

First, we remind MPC that the Transportation Planning Rule clearly requires Eugene, Springfield and Lane County “to prepare and adopt an integrated land use and transportation plan ... in coordination with [LCOG]” by September 2004. *See* OAR 660-012-0055(1)(a).

We are troubled that the FY2003–2004 UPWP included doing so as a special project within the MPO area but the Draft FY2004–2005 UPWP deletes this activity. *See* Draft FY2004–2005 UPWP, p. 28. We strongly encourage MPC to retain this activity in the UPWP.

Moreover, as we have suggested before, we urge MPC to direct staff to assess what tasks would have to be done, how long they would take, and how much it would cost to complete an integrated land use and transportation plan. We have already offered to work with your staff in this matter to arrive at a reasonable approach towards completing an integrated land use and transportation plan.

In particular, of the five elements defined in OAR 660-012-0035(5)(c)(A) through (E), the local jurisdictions have made some progress towards completing four items:

- (A) changes to land use plan designations, densities, and design standards (to better support transit, to increase allowed densities in “community centers,” i.e., nodes, to designate lands for community shopping centers, and to provide a better balance between jobs and housing);
- (B) a transportation demand management (TDM) plan that includes significant new transportation demand management measures;
- (C) a public transit plan that includes a significant expansion in transit service; and
- (E) plan and ordinance provisions to support the foregoing.

In particular, (A) the nodal development strategy, (B) increased funding for TDM, and (C) Bus Rapid Transit (BRT), are all positive steps being undertaken. We support these efforts and encourage the cities and county, working with LTD and LCOG, to continue implementing these strategies.

As highlighted by your legal counsels and formalized in resolutions by the cities, county and LTD, one element has not yet been done at all:

- (D) policies to review and manage roadway improvements to ensure that their effects are consistent with achieving the adopted strategies (nodal development, BRT, etc.) for reducing reliance on the automobile.

Fortunately, element (D) is perhaps the easiest to accomplish insofar as it requires merely adopting policies, in particular, in TransPlan. We strongly urge MPC to direct staff to include the completion of element (D) as part of the Regional Transportation Plan (RTP) update that is already in the UPWP and scheduled for completion in December 2004. *See* Draft FY 2004–2005 UPWP, pp. 12–15.

Beyond completing element (D), we note that an integrated land use and transportation plan should be “integrated,” i.e., that the different parts of the plan should work together to achieve the goal of reduced reliance on the automobile, as well as better transportation choices, improved livability, economic vitality, etc. For example, element (A) contemplates increasing residential densities within 1/4 mile of transit lines in order to better support transit, i.e., element (C). Element (D) is intended to assure that investments in roadways don’t undermine investments in nodal development, i.e., element (A) and BRT, i.e., element (C), thus saving taxpayers money. Element (E) is intended to assure that plan and ordinance provisions are consistent with and support the various strategies in order to increase the likelihood of success.

As you know, the attorneys continue to argue about whether the cities and counties are *required* to prepare and adopt an integrated land use and transportation plan. If the attorneys can’t come to an agreement, judges could resolve that question.

But wouldn’t it be better to not go down that road, so to speak? TransPlan already call for the development of an integrated land use and transportation plan. Doing so is part of the current UPWP. It just makes sense to implement the five elements (A) through (E) of such a plan, not because it is required by the State but because it is a good way to better achieve and balance multiple community goals.

But you first have to retain the preparation and adoption of an integrated land use and transportation plan in your UPWP so that it is something you can even have staff work on.

Public Involvement

Public involvement is a difficult issue. MPC has been trying for over a year to improve public involvement, so far without much success, at least in terms of the number of new faces who attended the recent STIP forum.

To be sure, staff has done much to improve public involvement. We appreciate their efforts.

As has been noted before, all this transportation stuff is complicated. It is difficult for the man or woman in the street to come in off the street and be able to say something useful about the transportation policy and funding choices you make.

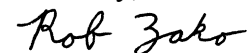
One idea that has been discussed is to form a Citizen Advisory Committee (to MPC) on transportation issues. This idea isn't perfect. It is yet another committee in what is already a complicated and confusing process. It would require additional staff time to support such a committee. And you might have as much trouble finding people willing to serve on the committee as you have had trying to get people to come to a drop-in forum on the STIP. But the idea is better than nothing and should be tried.

In particular, a Citizen Advisory Committee, be it a standing committee or an ad hoc committee, should assist in the update to the public involvement plan. *See* Draft, p. 19. Ordinary citizens are in a good position to advise on what kinds of public involvement techniques work and what don't.

It serves no good purpose to spend lots of money to "throw parties" and then have no one show up. You need to find ways to bring more people into the "party."

Please let me know how we might be of further assistance.

Sincerely,



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