

October 14, 2004

Mr. Bruce Warner  
Oregon Department of Transportation  
355 Capital Street, NE, Room 101  
Salem, OR 97301-3871

Mr. Warner:

Representing the Central Lane MPO, the Metropolitan Policy Committee appreciates the opportunity to comment on the proposed Freight Route Designations developed as part of the Freight Route Analysis Project. Reasonable and reliable travel time for the movement of freight is a critical element in both the statewide and local economies.

At the local level, the designation of freight routes presents both opportunities and issues. Overall, our initial review of the proposed designations has flagged some significant implications for existing and future land use development. Given the aggressive timeline leading to adopting these designations, MPC is requesting an extension of the public comment period to allow local agencies more time to respond to specific parts of the proposal. We also recommend that management Plans be completed prior to formal designation of freight routes within urban areas.

Generally, the freight route designations would seem to signify that a certain state-level priority is being given to the designation. It would logically follow that additional resources might be available for improvements along those routes. However, given the limited resources available for transportation improvements overall, and the extensive nature of the proposed additions to the statewide freight system, we realize that these designations are certainly no guarantee of funding for the proposed routes in the Central Lane MPO area. Without more detailed prioritization, the set of proposed designations could dilute the state's highway investment strategy.

The proposed designations can overlay a new set of performance standards on the existing system. Higher mobility standards on facilities that currently double as a main street may negatively affect pedestrian and bicycle safety as well as accessibility to adjacent businesses.

Certain segments of the proposed designations in the Central Lane MPO area present significant implications for surrounding existing and future land development. For example, Main Street in Springfield east of its intersection with Hwy 126, has been proposed for freight route designation. That segment currently provides access to several businesses servicing the surrounding residential areas. In

particular, that segment provides major access to two of Springfield's nodal developments and key vacant developable land in the Jasper-Natron area. The freight route designation could trigger higher mobility standards and design standards that would limit the concept designs currently being developed for the Hwy 126/Main Street intersection area to the higher cost interchange alternatives. The designation could also limit the city's ability to intensify the development surrounding the facility and would affect the bicycle and pedestrian use of the facility.

We recognize the importance of identifying a statewide freight route system that provides increased freight mobility, accessibility, and safety standards. Further, we understand the positive economic impacts of developing a more efficient Statewide freight route system. However, in urban areas the complexity of the interactions between the transportation system and adjacent and surrounding land use calls for a more deliberate process to explore the overall implications of freight route designations.

The process for review has required an aggressive timeline for providing comment on the proposed designations. Due to the array of implications that have not yet been adequately investigated, we recommend an extension of the public comment period to allow local agencies the opportunity to fully assess the implications of the proposed designations. We also recommend that management plans be conducted prior to formal designations made in urban areas.

We look forward to working with ODOT on these important issues. We will continue to review and comment on the proposed designations as they evolve.

Sincerely,

Bonny Bettman  
Chair,  
Metropolitan Policy Committee

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