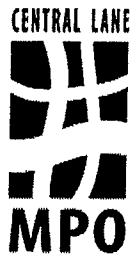


Following contains all comments received as of 10 pm, October 30, 2007, during and just prior to (at open house) the public comment period established for the 2031 Regional Transportation Plan:

Opened August 3, 2007

Closes November 5, 2007



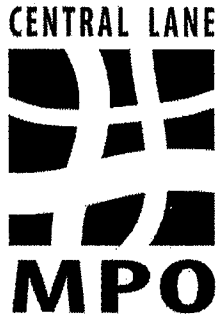
# Metropolitan Transportation Improvement Program and Regional Transportation Plan — Open House Sign In

July 30, 2007

Check below if you want to be on the mailing list.\*

Name	Group/Representing	Mailing Address	E-mail	
Mike O'Brien	OR Daily Emerald			<input type="checkbox"/>
Deb Brewer	EWEB	d	deb.brewer@eweb.eugene.or.us	<input type="checkbox"/>
Karl Morgenstern	EWEB	P.O. Box 10148 Eugene 97440	Karl.Morgenstern@eweb.eugene.or.us	<input type="checkbox"/>
Gleason Mulder	Self or LWVLC	2775 Emerald, 97403	ebmulder@uoregon.edu	<input type="checkbox"/>
Cora Jones	Whilansat Natural Area			<input type="checkbox"/>
Charlotte Behm	" Citizens Planning Committee	731 Poltava St <sup>apt</sup> 97471	behmc@lanec.edu	<input checked="" type="checkbox"/>
JAVL PANNICHEN	FAIRMOUNT NEIGHBORS ASSN	2435 Skyline Blvd EUG 97403	lita@efn.org	<input type="checkbox"/>
Diana Aldredge	TCAAC (new member)	125 E 8th Ave Eug 97401	diana@local2831.org	<input type="checkbox"/>
K. Liversidge	LILA	140 Hamilton Ave Eug 97404	KARIVERNIDER@WEBTV.NET	<input type="checkbox"/>
Christin Watchie	Trans-Watch	1035 Monroe Eug. 97402	transwatch@mindspring.com	<input checked="" type="checkbox"/> if not already!
Karen Januszewski	None	P.O. Box 1612 Eug 97440	ADVENTURSKI@IWN.COM	<input checked="" type="checkbox"/>
Mark Poznansky	(attended but did not sign in)			<input type="checkbox"/>

\* Sign up to receive information, usually by email, about public comment opportunities and other events related to regional transportation planning.



The Central Lane Metropolitan Planning Organization (MPO), the federally designated regional transportation planning organization for the Eugene-Springfield-Coburg area, is updating its long range and short range transportation plans.

The public comment period for the draft short range plan, the FY08-11 Metropolitan Transportation Improvement Program (MTIP), is now open through 5 pm August 6, 2007.

The preliminary draft long range plan, the 2031 Regional Transportation Plan (RTP), will be available for first viewing at the open house. The public comment period on the RTP will open on August 3, 2007, through 5 pm September 10, 2007, with a public hearing scheduled for 11:30 am on August 9, 2007 at the MPO policy board meeting to be held at the Eugene Public Library.

Details of these meetings and materials can be accessed at <http://www.lcog.org>, and are also available at Lane Council of Governments, 99 E. Broadway, Suite 400, Eugene. Contact Paul Thompson at 541-682-4283 for more information, or email [mpo@lcog.org](mailto:mpo@lcog.org).

PLEASE PROVIDE YOUR COMMENT and submit to LCOG:

Product commenting upon: MTIP RTP

Date of comment: \_\_\_\_\_

Name: DAVID SONNICHSEN

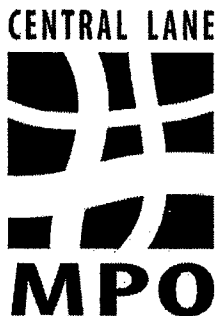
Address: 2435 Skyline Blvd.

Email Address (if any): lita@efu.org

The MPO maintains a list of interested persons who are contacted when there is news on transportation related activities within the MPO. Please check if you would like to be added to this list and to receive an occasional email update.

Please contact me

I support naming the Interstate 5/Willamette river bridge between Eugene (on the west) and Springfield (on the east) with a Kalapuya native-American name, to honor the area's first people. Some of their descendants are still residents of this area, and about 140 words of their language are known. I hope MPO/LCOG will also lend support.



The Central Lane Metropolitan Planning Organization (MPO), the federally designated regional transportation planning organization for the Eugene-Springfield-Coburg area, is updating its long range and short range transportation plans.

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PLEASE PROVIDE YOUR COMMENT and submit to LCOG:

Product commenting upon: MTIP RTP

Date of comment: : 7/30/07

Name: : Deb Brewer

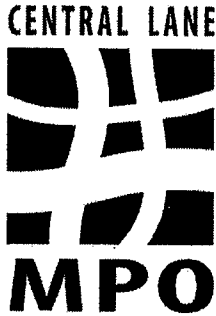
Address : 5224 Cold Springs, Eugene

Email Address (if any) : \_\_\_\_\_

The MPO maintains a list of interested persons who are contacted when there is news on transportation related activities within the MPO. Please check if you would like to be added to this list and to receive an occasional email update.

Please contact me

*We really need public transit to the airport!  
 What will we do during the 2008 Olympic Trials  
 and beyond?*



The Central Lane Metropolitan Planning Organization (MPO), the federally designated regional transportation planning organization for the Eugene-Springfield-Coburg area, is updating its long range and short range transportation plans.

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PLEASE PROVIDE YOUR COMMENT and submit to LCOG:

Product commenting upon: MTIP RTP

Date of comment: :

Name: :

*Ken Riverider*

Address :

*140 Hamilton Ave Eugene 97404*

Email Address (if any) :

*KARIVERIDER@WEB.TV.NET*

The MPO maintains a list of interested persons who are contacted when there is news on transportation related activities within the MPO. Please check if you would like to be added to this list and to receive an occasional email update.

Please contact me

*I would like to see the I-5 bridge over the Willamette given a name ~~honoring~~ honoring the Kalapuya,*

*Bus Eugene - Florence*

*Kalapuya@centurytel.net*

*Esther Stutzman  
Kalapuya elder*



The Central Lane Metropolitan Planning Organization (MPO), the federally designated regional transportation planning organization for the Eugene-Springfield-Coburg area, is updating its long range and short range transportation plans.

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PLEASE PROVIDE YOUR COMMENT and submit to LCOG:

Product commenting upon: MTIP RTP  
Date of comment: : 7/30/07  
Name: : Karl Morgeastern, EWEB  
Address : P.O. Box 10148 Eugene 97440  
Email Address (if any) : Karl.Morgenstem@eweb.eugene.or.us

The MPO maintains a list of interested persons who are contacted when there is news on transportation related activities within the MPO. Please check if you would like to be added to this list and to receive an occasional email update.

Please contact me

Has transportation planning considered re-evaluating the assumptions to accommodate potential future scenarios associated w/ reduced energy supplies (Peak oil), carbon limits and regulations assoc. w/ carbon emission reduction. These future scenarios would likely have impact on transportation. Also interested in long-term infrastructure replacement, coordination among utilities, cities, county, etc to see if opportunities exist among capital projects to do things more efficiently and plan for future resource constraints



**Date:** August 9, 2007  
**From:** Rob Zako, Transportation Advocate  
**To:** Central Lane Metropolitan Planning Organization  
**Re:** Preliminary Draft 2007–2031 Regional Transportation Plan

## Executive Summary

The RTP update is required in order to comply with new federal requirements in SAFETEA-LU. SAFETEA-LU requires that the metropolitan transportation planning process “promote consistency between transportation improvements and State and local planned growth and economic development patterns,” i.e., land use plans. Unfortunately, as the relevant land use plans end in the year 2015 (Eugene, Springfield and Lane County) or the year 2025 (Coburg), it is difficult to adopt a RTP consistent with those plans through the year 2031. There is no clear analysis of transportation needs, hence no clear basis on which to select particular projects. The plan appears to be based on two land use scenarios, one of which is unrealistic and the other of which promotes the expansion of the Springfield UGB in advance of that decision being made. The 2007–2031 RTP, in its current form, doesn’t adequately meet either federal or state requirements for integrated transportation and land use planning. We recommend several actions the MPO should take to comply with the spirit and letter of federal requirements.

Dear members of the Central Lane Metropolitan Planning Organization (MPO),

Thank you for this opportunity to submit comments regarding the Preliminary Draft 2007–2031 Regional Transportation Plan.

## SAFETEA-LU

As you know, the update to the Regional Transportation Plan (RTP) is required in order to comply with new federal requirements in the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), which President Bush signed into law on August 10, 2005.<sup>1</sup>

SAFETEA-LU is a huge 836-page bill that includes many federal earmarks, for example, \$1 million for Highway Project #4704 to improve the Interstate-5 interchange at the City of Coburg and \$1 million for Highway Project #4715 to improve transportation around the Federal Courthouse in Eugene.

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<sup>1</sup> <http://www.fhwa.dot.gov/safetealu/>

Fortunately, a fact sheet on metropolitan planning<sup>2</sup> tells you most of what you need to know for the RTP update:

### **Key Modifications**

Modifications to the metropolitan planning process include the following:

#### ***Metropolitan Planning in General***

- MPOs will be encouraged to consult or coordinate with planning officials responsible for other types of planning activities affected by transportation, including planned growth, economic development, environmental protection, airport operations, and freight movement. [6001(g)]
- *The metropolitan planning process is to promote consistency between transportation improvements and State and local planned growth and economic development patterns. [6001(h)]*
- Safety and security of the transportation system are separate planning factors that are to be considered during the metropolitan planning process. [6001(h)]
- A State will have 30 days to reimburse an MPO for planning expenses after request from the MPO for reimbursement

#### ***Long Range Transportation Plan (Plan)***

- Will be updated every 4 years (unless the MPO chooses to do so more frequently) in non-attainment and maintenance areas. Attainment areas remain on a 5-year update cycle. [6001(i)]
- Intermodal connectors are added as a transportation facility. [6001(i)]
- Include a discussion of potential environmental mitigation activities along with potential sites to carry out the activities to be included. The discussion is to be developed in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies. [6001(i)]
- Transit operators are to be included in the cooperative development of funding estimates for the financial plan section. [6001(i)]
- MPOs are required to consult with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning development of the Plan. [6001(i)]
- Representatives of users of pedestrian walkways, bicycle transportation facilities, the disabled are specifically added as parties to be provided with the opportunity to participate in the planning process. [6001(i)]
- The MPO is to develop a participation plan in consultation with interested parties that provides reasonable opportunities for all parties to comment. [6001(i)]
- To carry out the participation plan, public meetings are to be: conducted at convenient and accessible locations at convenient times; employ visualization

<sup>2</sup> <http://www.fhwa.dot.gov/safetealu/factsheets/mp.htm>

techniques to describe plans; and make public information available in an electronically accessible format, such as on the Web. [6001(i)]

- The Plan is to be published and made available electronically, such as on the Web. [6001(i)]

(Emphasis added.)

## Consistency between land use and transportation plans

Note especially, as highlighted above, that SAFETEA-LU amends<sup>3</sup> the scope of the planning process:

### 23 U.S.C. 134. Metropolitan transportation planning

...

#### (h) Scope of Planning Process.—

- (1) **In general.**— The metropolitan planning process for a metropolitan planning area under this section shall provide for consideration of projects and strategies that will—

...

- (E) protect and enhance the environment, promote energy conservation, improve the quality of life, and *promote consistency between transportation improvements and State and local planned growth and economic development patterns*;

...

(Emphasis added.)

In brief, it is now federal law that the transportation planning process conducted by the metropolitan planning organization “promote consistency between transportation improvements and State and local planned growth and economic development patterns,” i.e., land use plans.

We hasten to note that the highlighted language is new: The *explicit* federal requirement to promote consistency with land use plans didn’t exist before SAFETEA-LU.

## Challenge of adopting RTP in advance of land use plans

At your meeting in April 2007, staff explained<sup>4</sup>:

Federal regulations further require that the RTP must be consistent with locally adopted plans and policies. The difficulty in meeting these requirements arises from trying to craft a federal long-range RTP that is consistent with local plans, while planning, in the case of the MetroPlan, 16 years beyond the local comprehensive plan and TSP. Since the MetroPlan only provides planning and policy direction through 2015—the first 8 years of the 24-year RTP—it becomes

<sup>3</sup> A current version of the relevant U.S. Code is available at [http://www4.law.cornell.edu/uscode/html/uscode23/usc\\_sec\\_23\\_00000134----000-.html](http://www4.law.cornell.edu/uscode/html/uscode23/usc_sec_23_00000134----000-.html)

<sup>4</sup> <http://www.lcog.org/meetings/mpc/0407/MPC4.f-CoverMemo-RTPHorizon.pdf>

a challenge for the MPO to plan for the additional 16 years without appearing to “lead” the local planning process.

According to the minutes of that meeting<sup>5</sup>:

Mr. Vanderpool asked the MPC for direction to model a range of development patterns from accommodating all growth through 2031 within the existing urban growth boundary (UGB) at higher than observed current densities to accommodating growth at currently observed actual densities, including accommodating a portion of the growth through 2031 beyond the current UGB. He said the models were not breaking down, the approach met federal requirements, and it did not appear to cause a lot of work for the MPC.

To the best of our knowledge, at that meeting the Metropolitan Policy Committee (MPC), i.e., the MPO policy board, declined to give staff the requested direction. Moreover, the question of how to develop a transportation plan that is consistent with land-use plans without “leading” those plans has not been raised again with MPC. Thus the Preliminary Draft 2007–2031 RTP appears to have been developed without explicit policy direction from the MPC (or for that matter from the public), at least on the key question of planned land uses.

Unfortunately, the sections of the Preliminary Draft 2007–2031 RTP dealing with these questions (Part Two of Chapter 4) appear to still be incomplete. Thus at this time it is not possible to evaluate in detail what land use assumptions the RTP is making.

## Transportation needs

Although one might think that a primary purpose of the RTP is to address the transportation needs of the region, SAFETEA-LU is vague about those needs. SAFETEA-LU does provide:

### **23 U.S.C. 134. Metropolitan transportation planning**

#### **(a) Policy.— It is in the national interest to—**

- (1) encourage and promote the safe and efficient management, operation, and development of surface transportation systems *that will serve the mobility needs of people and freight* and foster economic growth and development within and between States and urbanized areas, while minimizing transportation-related fuel consumption and air pollution through metropolitan and statewide transportation planning processes identified in this chapter;

...

(Emphasis added.)

But the opening paragraphs of the Preliminary Draft 2007–2031 RTP itself do a good job of explaining transportation needs in a general way:

... Generally, the need for transportation stems from our need to access goods, services, and other people within and beyond the region. The ease by which we are able *to get from home to school, to a job, to medical services, to shopping and back again* is dependent upon the efficiency and effectiveness of the region’s transportation system.

<sup>5</sup> <http://www.lcog.org/meetings/mpc/0607/AprilMinutes.pdf>

As the region grows, additional demands are put on the system. With limited resources, determining the best means for improving the system and meeting future demand is challenging. ...

(Emphasis added.)

In other words, transportation needs arise out of people's desire to get from one place to another, i.e., from one land use to another. Hence it is impossible to consider transportation needs without also considering land uses.

The Oregon Transportation Planning Rule (OAR Chapter 660, Division 12)<sup>6</sup> is more explicit about the requirement to assess transportation needs in developing a transportation (system) plan:

**OAR 660-012-0030: Determination of Transportation Needs**

- (1) The TSP shall identify transportation needs relevant to the planning area and the scale of the transportation network being planned including:
  - (a) State, regional, and local transportation needs;
  - (b) Needs of the transportation disadvantaged;
  - (c) Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR 660-009 and Goal 9 (Economic Development).

...

OAR 660-012-0005(32) defines "transportation needs" as follows:

"Transportation Needs" means estimates of the movement of people and goods consistent with acknowledged comprehensive plan and the requirements of this rule. Needs are typically based on projections of future travel demand resulting from a continuation of current trends as modified by policy objectives, including those expressed in Goal 12 and this rule, especially those for avoiding principal reliance on any one mode of transportation.

Although the requirement in the TPR applies directly to a transportation system plan (TSP), not a regional transportation plan (RTP), the TPR requires each local governments ensure that its TSP is consistent with the RTP. In particular, both types of transportation plans must address the same identified transportation needs.

## **"Putting the cart before the horse": projects before needs**

1000 Friends of Oregon is concerned that the MPO is "putting the cart before the horse."

Looking at the Preliminary Draft 2007–2031 RTP we see a detailed list of projects in a financially constrained list. Presumably these projects are intended to meet the current and future transportation needs of the region.

But we see no clear identification of what those needs are. Where did this list of planned transportation projects come from? Why were these projects selected and not others? What other projects were considered? Who decided? When did these discussions take place? When was the public consulted about their needs and which projects would best serve those needs?

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<sup>6</sup> [http://arcweb.sos.state.or.us/rules/OARS\\_600/OAR\\_660/660\\_012.html](http://arcweb.sos.state.or.us/rules/OARS_600/OAR_660/660_012.html)

All we can find is the following vague explanation in the Preliminary Draft RTP (Chapter 3, Page 3):

### **Summary of Needs Analysis**

Transportation needs for the Central Lane area were assessed using standard methods typically employed in regional transportation planning. The analysis of needs was based on population and employment growth forecasts consistent with statewide forecasts. The population and employment forecasts were used to establish overall demand for transportation.

In particular, we wonder about two large ODOT projects being moved from the illustrative list to the financially-constrained list since the 2004 update:

#27 Hwy. 126 at Main St.: Construct interchange (\$50,000,000)

#30 Hwy. 126 at 52<sup>nd</sup> St.: Construct interchange (\$40,000,000)

What needs do these projects serve? Who decided?

## **Land use scenarios**

Although the Preliminary Draft RTP is vague about transportation needs, we surmise that those needs are based on one or both of two land use scenarios developed by staff without the approval by the MPO Policy Board.

One of the two land use scenarios is based on “higher-than-observed (but allowable) densities.” According to the staff memo from April 2007:

However, the RTP will recognize the fact that this primary scenario will necessarily rely on higher-than-observed (but allowable) densities in order to accommodate growth through 2031 within the existing UGBs. In so doing, the RTP will acknowledge the fact that guidance for growth beyond the current Eugene-Springfield-Lane County comprehensive plan horizon of 2015 (and beyond the Coburg comprehensive plan horizon of 2025) must come from the local level. The RTP will expressly state that the primary 2031 RTP scenario is based on current comprehensive plan guidance, but is modeled only for the purpose of the federal RTP, and that when new guidance is available at the local level for growth beyond 2015, the next update of the RTP will reflect that guidance.

We question how realistic it is to assume that development will occur at “higher-than-observed (but allowable) densities,” at least absent any changes in local land use regulations that would promote such higher densities.

The other land use scenario contemplates expanding the urban growth boundary (UGB) in an unspecified manner. According to the staff memo from April 2007:

The 2031 RTP will also include an *illustrative* scenario demonstrating what the performance of the transportation system may be like with allocation of some of the growth through 2031 outside of the current UGBs. This illustrative scenario will be in the form of an appendix noting that under currently observed development densities, and carrying forth all other guidance from the existing comprehensive plans, allocation of some portion of the anticipated residential growth through 2031 would need to occur outside of the existing UGBs. The

illustrative scenario would be developed in coordination with the local jurisdictions to demonstrate what such a development scenario may look like.

We did not find the appendix that explains this illustrative scenario.

But looking at the financially-constrained project list, we see that all the new arterial links and interchanges are planned in Springfield:

- #27 Hwy. 126 at Main St.: Construct interchange (\$50,000,000)
- #30 Hwy. 126 at 52<sup>nd</sup> St.: Construct interchange (\$40,000,000)
- #66 Bob Straub Parkway, 57<sup>th</sup> St. to Jasper Rd. at Brand S Rd.: Phase 1: Construct 2-lane arterial between 57<sup>th</sup> St. and Mt. Vernon; construct turn lanes at intersections. Improve railroad crossing at Jasper Rd. Phase 2: Widen to 4-lane plus a median (\$10,000,000)
- #930 Centennial Blvd./Industrial Ave., 28<sup>th</sup> St. to 35<sup>th</sup> St.: Construct 3-lane urban facility (\$3,715,000)

Thus one could conclude that the illustrative scenario contemplates that Springfield will expand its UGB around Highway 126 (where two new interchanges are planned) and towards the Jasper-Natron area (where the Bob Straub Parkway will extend from Highway 126 towards Highway 58). In any case, Springfield has made no secret that it believes it will need to expand its UGB soon. And now under House Bill 3337 (2007), Springfield appears poised to do so without needing to gain approval from either Eugene or Lane County.

Indeed, by planning all the new roadways near the edge of Springfield, the Preliminary Draft RTP is, in effect, deciding to expand the UGB, claims by staff that the RTP process will not “lead” the land use process notwithstanding. After all, once the infrastructure is planned near the edge of the Springfield UGB, wouldn’t it make sense for future UGB expansions to occur in areas already planned to be served?

The process leading to the Preliminary Draft RTP appears to be based on two land use scenarios, neither of which have been discussed in detail by the MPO Policy Board nor made explicit for the public to consider. But it appears that the projects selected are aimed to support desired growth in Springfield, whether or not that growth is yet planned in local land use plans.

We fail to see how such a process “promote[s] consistency between transportation improvements and State and local planned growth and economic development patterns,” as now required by federal law.

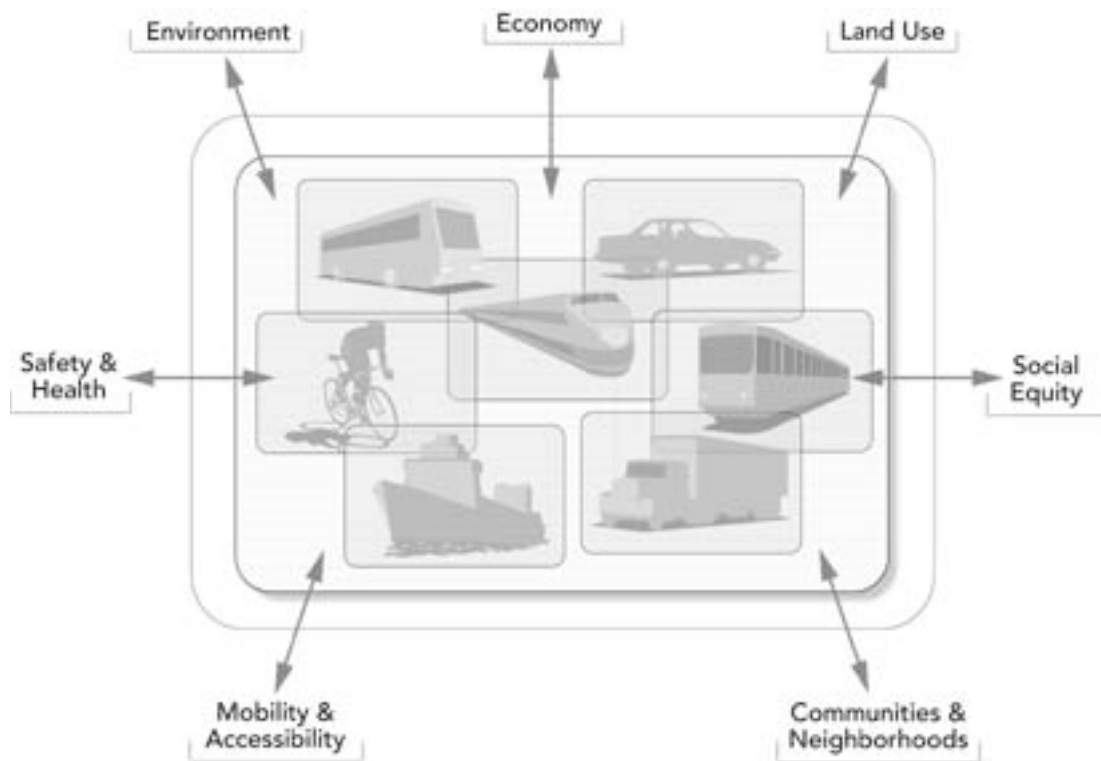
According to *The Metropolitan Transportation Planning Process: Key Issues, A Briefing Notebook for Transportation Decision-makers, Officials, and Staff*<sup>7</sup>:

Metropolitan transportation planning provides the information, tools, and public input needed for improving transportation system performance. Transportation planning should reflect the community’s vision for its future. It should also include a comprehensive consideration of possible strategies; an evaluation process that encompasses diverse viewpoints; the collaborative participation of relevant transportation-related agencies and organizations; and an open, timely, and meaningful involvement of the public. Transportation planning requires a

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<sup>7</sup> <http://www.planning.dot.gov/documents/BriefingBook/BBook.htm>

comprehensive, holistic look at the needs and the future of the region and its inhabitants as shown in Figure 1.



*Figure 1: Links between transportation and other societal goals: transportation decisions affect our society in many ways. Conversely, many of society's decisions have an impact on our transportation system.*

... A metropolitan planning organization (MPO) is a transportation policy-making organization made up of representatives from local government and transportation authorities. The Federal legislation passed in the early 1970's required the formation of an MPO for any urbanized area with a population greater than 50,000. MPOs were created in order to ensure that existing and future expenditures for transportation projects and programs were based on a continuing, cooperative and comprehensive (3-C) planning process. Federal funding for transportation projects and programs are channeled through this planning process.

We do see how the process to update the RTP is continuing, but we fail to see how it is cooperating nor comprehensive, as required by the "3-C" federal requirements, as we see no evidence of cooperation to consider future transportation needs, i.e., future land uses.

## Conclusion

In brief, we question whether the 2007–2031 RTP, in its current form, adequately meets either federal or state requirements for integrated transportation and land use planning.

We recommend the Central Lane MPO take the following actions in advance of adopting the 2007–2031 RTP:

1. Staff should provide decision makers and the public with detailed information about the land use scenarios under consideration: information about higher-density levels, where

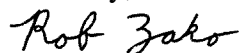
these are projected to occur, and what these would look like, and information about where UGB expansions are projected.

2. The MPO should gather public input about the land use scenarios, as these relate to the future transportation needs of the public. Then the MPO should discuss these land use scenarios, coordinating these discussions with discussions by the local governments responsible for making land use decisions.
3. Once the underlying land uses and resulting transportation needs are understood, several alternatives for addressing these needs should be proposed. The public should have an opportunity to comment on the pros and cons of each alternative approach before a preferred approach is proposed.
4. The MPO should involve the local governments in these discussions at the decision-maker level, taking special care to ensure that they understand that adoption of the RTP will trigger the requirement under the TPR to update local transportation system plans within one year. Local governments should cooperate with the MPO in assuring that transportation and land use plans are consistent, or will soon be made so.
5. If, as it likely, such a program will delay the adoption of the RTP, the MPO should immediately seek permission from the federal government to take the time needed to adequately comply with federal requirements. Given that SAFETEA-LU contains new requirements, in particular, a requirement for a higher level of coordination between transportation and land use planning, it is only natural that it would take more time to meet this requirement, at least the first time around.

We look forward to the MPO Policy Board considering our concerns and recommendation, ultimately arriving at an approach that will indeed satisfy requirements for integrated planning, as well as serve the region's interests.

Please let me know if you have questions or concerns.

Sincerely,



Rob Zako  
Transportation Advocate  
1280-B East 28<sup>th</sup> Ave.  
Eugene, OR 97403-1616  
Phone: (541) 343-5201  
Fax: (541) 683-6333  
rob@friends.org



**Date:** September 9, 2007

**From:** Rob Zako, Transportation Advocate

**To:** Central Lane Metropolitan Planning Organization

**To:** Citizen Involvement Committee

**Re:** Public Involvement and the Draft 2007–2031 Regional Transportation Plan

## Executive Summary

As of Saturday, September 8, the *complete final draft* RTP is still not available online to the public. Thus we call on you to continue the public hearing on the RTP to your October meeting, and to postpone making any final decisions on the RTP Update until your November meeting at the earliest.

Dear members of the Central Lane Metropolitan Planning Organization,

## Government by and for the people

When they faced a hostile government in England, the people of the American colonies issued their Declaration of Independence:

“... We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable rights, that among these are Life, Liberty, and the pursuit of Happiness. That to secure these rights, Governments are instituted among Men, *deriving their just powers from the consent of the governed.* ...”

A few years later, the people of the newly formed United States adopted their Constitution:

“*We the People* of the United States, in Order to form a more perfect Union, establish Justice, insure domestic Tranquility, provide for the common defense, promote the general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America. ...”

Four score and seven years after the Declaration of Independence when the future of the Union was in doubt, President Abraham Lincoln penned his Gettysburg Address:

“... It is rather for us to be here dedicated to the great task remaining before us ... and that *government of the people, by the people, for the people*, shall not perish from the earth.”

In 1974, the Oregon Land Conservation and Development Commission adopted the Statewide Planning Goals, starting with Goal 1 for “Citizen Involvement”:

“To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process. ...”

In 1991, Congress adopted the Intermodal Surface Transportation Act. In regard to metropolitan transportation planning, ISTEA provided that:

“... The process for developing such [metropolitan transportation] plans and programs shall provide for consideration of all modes of transportation and shall be *continuing, cooperative, and comprehensive* to the degree appropriate, based on the complexity of the transportation problems. ...

“Each long range plan prepared by a metropolitan planning organization shall be *published or otherwise made readily available for public review*; ...”

Finally, in January 2007 the Central Lane MPO adopted its Public Participation Plan, the goal of which is to:

“Establish widespread understanding and support for regional transportation programs through development of an environment in which *citizens, agencies and other interested parties in the metropolitan area are actively involved in meaningful and effective dialogue.*”

As is clear from this brief history, the United States was formed out of distrust of one government and sought to form a “more perfect union,” a “government of the people, by the people, for the people.” The importance of public involvement in transportation planning under federal law, as well as the importance of citizen involvement in Oregon, are both rooted in the recognition that government is intended to serve the people, is elected by the people, and uses monies coming from taxes on the people.

Government by and for the people is the ideal we continue to strive for.

## **Failures of government**

In practice, government sometimes falls short of the idea. In recent years, trust in governments at all levels has dropped. There are many examples, which you know well.

Just a couple years ago, the country watched in horror as Hurricane Katrina devastated New Orleans and surrounding areas, our governments apparently not up to the task of preparing for a clear and imminent danger nor the task of fixing problems in the aftermath.

Just a few months ago, people driving home from work in Minnesota experienced an Interstate bridge collapsing for no apparent reason.

Here in Oregon, we strive to do better. But even here there is a strong current of distrust for government at all levels. Proposed Lane County taxes have been voted down numerous times. The November 2007 ballot will feature several referendums on actions local elected officials are seeking to take: gas taxes and downtown development.

Against this backdrop, you must continue to do all you can to earn and retain the trust of the public you serve.

## **Public hearing on the Regional Transportation Plan**

Why are these considerations relevant?

The last time the Central Lane MPO held a public hearing on the RTP was in December 9, 2004. Roughly 40 people showed up to testify. Because it was urgent to update the RTP in order to ensure that federal transportation funds continued to be available, that public hearing was truncated and many people left feeling like their opinions were not seriously considered.

But at the time, some members of the Central Lane MPO offered personal assurances that the next update of the RTP would be more comprehensive and that there would be adequate opportunities for the public to engage in the process.

Now three years later, we have a problem. A major issue for the current update is ensuring that the transportation plans are integrated with and consistent with land use plans. A challenge is the fact that the Eugene-Springfield Metro Plan goes through only the year 2015 and the updated RTP goes through the year 2031. I and others continue to raise this issue, and to ask for more detail to help us better understand the issues and the options for moving forward.

But as of this weekend, just a few days before the only public hearing on the RTP scheduled for September 13, 2007, a complete draft of the RTP is still not available online. Yes, there is a list of projects to be built, but there is still no available detailed explanation of how these projects relate to the current and expected land uses that will generate the traffic that gives rise to the need for these projects.

*[Update: As of Sunday morning, the complete Draft 2007–2031 Regional Transportation Plan is finally available online.]*

It isn't reasonable to expect the public to digest and offer meaningful comments on a plan that isn't available until just a few days before the only public hearing.

## **Call for continuing the public hearing to the October meeting**

Fortunately, unlike the prior time when it was essential to adopt the RTP update by a certain "drop dead" date, staff has indicated that there is no such urgency this time. Although it would be nice to adopt the RTP update in October, it would be fine to adopt later.

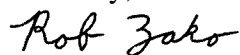
**As such, we call on you to continue the public hearing on the RTP to your October meeting, and to postpone making any final decisions on the RTP Update until your November meeting at the earliest.**

As a general rule, you should strive to ensure that the public has at least 30 days to review the RTP, including at least two weeks before any public hearing, not merely to have a public comment period that extends for that time but when the complete document isn't yet available.

(Personally, I will aim to offer initial comments on the complete final draft RTP at your meeting this Thursday. But as I need to be in Portland this Tuesday and Wednesday, I will most likely not have time to adequately review the complete final draft RTP before then.)

Please let me know if you have questions or concerns.

Sincerely,



Rob Zako  
Transportation Advocate  
1280-B East 28<sup>th</sup> Ave.  
Eugene, OR 97403-1616  
Phone: (541) 343-5201  
Fax: (541) 683-6333  
[rob@friends.org](mailto:rob@friends.org)

**Date:** September 13, 2007

**From:** Rob Zako, Transportation Advocate

**To:** Central Lane Metropolitan Planning Organization

**Cc:** Citizen Advisory Committee

**Re:** Request for Additional Information on the Final Draft 2007–2031 RTP

## Executive Summary

In order to adequately review the final draft 2007–2031 RTP and how well it meets transportation needs, we are requesting more detailed information than is available in the plan itself.

Dear members of the Central Lane Metropolitan Planning Organization (MPO),

Now that the final (i.e., complete) draft 2007–2031 Regional Transportation Plan (RTP) is available, we are beginning our detailed review of this document.

The section titled “Summary of Needs Analysis” (Chapter 3, Page 3) states:

“Transportation needs for the Central Lane area were assessed using standard methods typically employed in regional transportation planning. The analysis of needs was based on population and employment growth forecasts consistent with statewide forecasts. The population and employment forecasts were used to establish overall demand for transportation.

“In the development of the 2001 TransPlan, a wide range of strategies were identified to address this demand, including land use, TDM, and TSI strategies. Different combinations of these strategies were formulated as alternative plan concepts and test using a computer-based travel-forecasting model. The alternative plan concepts ranged from a Base Case consisting of trends to an alternative designed to meet the vehicle miles traveled reduction targets of the Transportation Planning Rule. These strategies are reflected in this Regional Transportation Plan.

“The alternatives development and evaluation included consideration of state and local needs consistent with the Oregon Transportation Plan, *Metro Plan*, and state and local improvement programs. Surveys were conducted to provide data on travel behavior and input on a wide range of alternative strategies. ...”

The section titled “Part Two: Projected Plan Performance” (Chapter 4, Page 5) states:

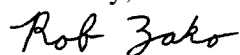
“... The data presented in this chapter stems from extensive computer modeling analyses of different combinations of land use, Transportation Demand Management, and Transportation System Improvements programs and capital investments. The analysis draws on recent surveys of transportation patterns and behavior in the Eugene-Springfield region. ...”

These brief explanations quoted above prompt several questions and requests:

1. The most recent document listed in Appendix C: List of Supporting Documents is dated June 2004. What studies, technical memoranda and other documents since June 2004 have been relied on in developing this RTP update? Would you please make these more recent supporting documents available to the public?
2. In particular, specifically which “recent surveys of transportation patterns and behavior in the Eugene-Springfield region” were used in developing this RTP update? Would you please make the results of these surveys available to the public?
3. In the development of this RTP update, how many different combinations of strategies (alternative plan concepts?) were modeled and what are they?
4. In particular, for each alternative plan concept, what assumptions (population and employment forecasts, projected land uses, etc.) are used and what combinations of capital investment and other actions are modeled?
5. How, if at all, do any of the alternative plan concepts take into account Measure 37 or House Bill 3337, both of which have gone into effect since the 2004 RTP update? (Note that the impact of Measure 37 would likely not be so much to increase development inside the MPO area, but rather to increase development outside the area, thus increasing the flow of regional traffic in and out of the area.)
6. Which of the alternative plan concepts is reflected in Chapter 3, especially the capital investment actions?
7. Which of the alternative plan concepts is reflected in Chapter 4? What are the performance measures for the other alternative plan concepts not reflected in Chapter 4?

We look forward to your prompt reply to our questions and requests so that we can continue our review of the final draft RTP.

Sincerely,



Rob Zako  
Transportation Advocate  
1280-B East 28<sup>th</sup> Ave.  
Eugene, OR 97403-1616  
Phone: (541) 343-5201  
Fax: (541) 683-6333  
[rob@friends.org](mailto:rob@friends.org)



**Date:** September 28, 2007

**From:** Rob Zako

**To:** Central Lane Metropolitan Planning Organization

**Cc:** Citizen Advisory Committee

**Re:** Capacity-Adding Roadway Projects in the Final Draft 2007–2031 RTP

## Executive Summary

We recommend not including capacity-adding roadway projects #27, #30, #1003, #506 and #333 in the financially constrained list, but rather in the illustrative list.

Dear members of the Central Lane Metropolitan Planning Organization (MPO),

## How transportation decisions can drive land use decisions

Planning to build this transportation project or that might sometimes seem like a pointless exercise, especially when no funding has yet been identified. What difference does it really make whether a particular project is “planned” or not, or in the financially constrained list as opposed to the illustrative list?

In fact, it matters a great deal, and the Regional Transportation Plan (RTP) you are currently considering has real consequences for how our community develops.

As anyone who has been paying attention knows, many proposed big new developments such as hospitals, Wal-Marts and Home Depots have gotten hung up on transportation issues. The basic idea in the state Transportation Planning Rule (TPR),<sup>1</sup> which implements Statewide Planning Goal 12 (Transportation), is clear: Don’t approve land use changes to allow new developments unless the transportation facilities to support those developments are “reasonably likely” to be built.<sup>2</sup> Thus the new PeaceHealth hospital in Springfield was contingent on the Interstate-5/Beltline project; the McKenzie-Willamette hospital in Eugene is contingent on improvements at Beltline and Delta Highway.

But who decides which projects are “reasonably likely” to be constructed, hence can be relied upon to support new developments? As it happens, to a great extent, you do. The MPO has the authority to decide which transportation projects are “reasonably likely” to be built, hence where new developments can be approved contingent on those projects.

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<sup>1</sup> OAR Chapter 660, Division 012, available online at [http://arcweb.sos.state.or.us/rules/OARS\\_600/OAR\\_660/660\\_012.html](http://arcweb.sos.state.or.us/rules/OARS_600/OAR_660/660_012.html)

<sup>2</sup> OAR 660-012-0060 (“Plan and Land Use Regulation Amendments”) specifies how land use changes must be supported by existing and planned transportation facilities.

How this works is simple: According to the TPR,<sup>3</sup> transportation projects in the RTP's financially constrained list are considered to be "reasonably likely" to be built. Period.

In fact, most projects in the financially constrained list don't yet have funding, and in some cases may never get funding, hence might never be built. But there is a kind of self-fulfilling prophecy at work here. If you decide to include a project in the financially constrained list, and then a local jurisdiction approves new developments assuming the planned project is "reasonably likely" to be built, the development will lead to new traffic that will ultimately require the planned project be funded and built.

In this way, although the lawyers will argue that you aren't technically making land use decisions, your decisions about what to include in the financially constrained list will heavily influence which land use decisions are approved and which aren't, hence where growth will occur and where it won't.

In simple terms:

Approving a capacity-adding project in the financially constrained list gives a "green light" to and drives new land uses around the project.

## Capacity-adding projects in the financially constrained list

We have heard many times your desire to not make land use decisions at the MPO table, but rather to merely coordinate decisions that have been made elsewhere. Given that a decision to include a capacity-adding project in the financially constrained list effectively pre-approves future land use decisions, your choice should be clear:

Don't include any capacity-adding projects in the financially constrained list until the local comprehensive planning calling for such projects has been completed.

Thus we consider capacity-adding roadway projects proposed to be added to the financially constrained list. As best as we can tell, there are five such projects, as shown in the table below:

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<sup>3</sup> OAR 660-012-0060(4) provides:

...

- (a) In determining whether an amendment has a significant effect on an existing or planned transportation facility under subsection (1)(c) of this rule, local governments shall rely on existing transportation facilities and services and on the planned transportation facilities, improvements and services set forth in subsections (b) and (c) below.
- (b) Outside of interstate interchange areas, the following are considered planned facilities, improvements and services:

...

- (C) Transportation facilities, improvements or services in a metropolitan planning organization (MPO) area that are part of the area's federally-approved, financially constrained regional transportation system plan.

...

**Table 1: Capacity-Adding Roadway Projects Added to Financially Constrained List**

Name	Geographic Limits	Description	Jurisdiction	Estimated Cost	Length	Number
<b>Project Category: New Arterial Link or Interchange</b>						
Eugene-Springfield Hwy. (SR-126)	@ Main St.	Construct interchange	ODOT	\$50,000,000	0.00	27
Eugene-Springfield Hwy. (SR-126)	@ 52nd St.	Construct interchange	ODOT	\$40,000,000	0.00	30
<b>Project Category: Added Freeway Lanes or Major Interchange Improvements</b>						
I-5	@ City of Coburg (Phase 1)	Interchange Improvements	ODOT	\$22,000,000	0.00	1003
North Eugene transportation improvements	River Rd. to Delta Hwy.	Improve capacity across Willamette River within north Eugene area	ODOT	\$51,292,000	1.76	506
<b>Project Category: Arterial Capacity Improvements</b>						
W. 11th Ave.	Green Hill Rd. to Terry St.	Upgrade to 5-lane urban facility	ODOT, Eugene	\$20,000,000	1.51	333

These five projects are not included in the financially constrained list in the 2004–2005 RTP.<sup>4</sup> They also are not included in the financially constrained list in the July 2002 *TransPlan*, which is a functional plan of the *Eugene-Springfield General Metro Plan*.

More to the point, we as yet see no evidence in the draft final 2007–2031 RTP (or supporting documents) that the inclusion of these five projects is consistent with locally adopted comprehensive plans or that the decision to include these five projects in the financially constrained list has been vetted at the local level (in particular, with public hearings by the responsible jurisdictions).

Note: The situation with project #1003, interchange improvements for the I-5/City of Coburg interchange, requires further comment. This project was not included in the financially constrained list in the 2004–2025 RTP. In August 2005, the MPO amended the 2004–2025 RTP to include this project in the financially constrained list.<sup>5</sup> That said, we see no documentation in the final draft 2007–2031 RTP itself, nor in Resolution 2005-10 amending the RTP, that this project is consistent with the City of Coburg Comprehensive Plan. We would be happy to see such documentation. Lacking such documentation, our concerns about not wanting transportation projects in the RTP to drive land uses remain.

<sup>4</sup> A draft list of new/changed projects from the 2004–2025 RTP is available online at <http://www.lcog.org/meetings/mpc/0607/MPC4.e-Attachment7-RTP-ProjectList-ChangedProjects.pdf>

<sup>5</sup> The staff cover memo is available online at [http://www.lcog.org/meetings/mpc/082005/MPC4c\\_CoverMemo\\_CoburgRTPAmendment.pdf](http://www.lcog.org/meetings/mpc/082005/MPC4c_CoverMemo_CoburgRTPAmendment.pdf)  
Resolution 2005-10 is available online at [http://www.lcog.org/meetings/mpc/082005/MPC4c\\_Attachment1\\_Resolution\\_2005-10.pdf](http://www.lcog.org/meetings/mpc/082005/MPC4c_Attachment1_Resolution_2005-10.pdf)

## Conclusion

As we appreciate the desire of the MPO to avoid making—or driving—land use decisions, we cannot support the inclusion of these five projects in the financially constrained list, *at least not without additional documentation of their consistency with land use plans covering the relevant time periods.*

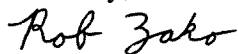
In conclusion:

We recommend not including capacity-adding roadway projects #27, #30, #1003, #506 and #333 in the financially constrained list, but rather in the illustrative list.

Please understand we have no specific objection to any of these projects. Moreover, once the necessary local land-use planning has been completed, the door would be open to amending the RTP to move these projects from the illustrative list to the financially constrained list.

Lastly, we note that we have found no documentation in Chapter 3 (“Plan Implementation”) of the RTP explaining the criteria for which projects to include in the financially constrained list, nor any process for selecting projects to include. In previous iterations, staff evaluated projects against the goals, objectives and/or policies in Chapter 2 (“Policy Element”) of the RTP, recommending including the projects most consistent with the policy element in the financially constrained list. If Chapter 2 of the RTP is to have any relevance at all, it must be used to guide the selection of projects in the financially constrained list, and this process must be documented.

Sincerely,



Rob Zako  
1280-B East 28<sup>th</sup> Ave.  
Eugene, OR 97403-1616  
Phone: (541) 343-5201  
Fax: (541) 683-6333  
[rob@friends.org](mailto:rob@friends.org)

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**From:** Rob Zako [rob@friends.org]  
**Sent:** Wednesday, October 10, 2007 9:48 PM  
**To:** Central Lane Metropolitan Planning Organization  
**Subject:** Comments already submitted into record for RTP  
**Attachments:** 1KF-CLMPO-RTP-20070809.pdf; 1KF-CLMPO-RTP-20070909.pdf

Dear Central Lane MPO,

Previously, I submitted comments on the RTP to the Central Lane MPO, which I have attached to this message:

**August 9:** During the Comments from the Public portion of MPC's August meeting, I entered written comments on the RTP into the record and spoke to these, as reflected in the minutes of that meeting. A staff memo for the September meeting respond to these comments.

**September 9:** A few days prior to MPC's September meeting, I emailed the MPO (and CAC) members written comments about extending the public comment period for the RTP.

Both of these comments were submitted during the August 3 - November 5 public comment period on the RTP and are intended to be part of the official record.

I am writing because I do not see either of these comments in the packets for the September or October MPC meetings, at least not in the online version. I want to ensure that these comments are indeed part of the record.

Thank you,  
Rob

P.S. Also, note that the LCOG's main transportation page still lists the the public comment period as ending on October 8, 2007 rather than on November 5, 2007. Please correct this error:

<http://www.lcog.org/lgs/trans.html>

--

Rob Zako  
1000 Friends of Oregon  
1280-B East 28th Ave., Eugene, OR 97403-1616 (home office)  
(541) 343-5201 (home office)  
(541) 683-6333 (fax)  
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<http://www.friends.org>

## GOAL ONE COALITION



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Goal One is Citizen Involvement

October 11, 2007

TO: Central Lane Metropolitan Planning Organization  
FROM: Goal One Coalition

**Re: Citizen involvement and the Regional Transportation Plan**

Members of the Committee:

I am here today on behalf of the Goal One Coalition. I have with me a petition, signed by 123 Lane County citizens, asking this Committee to delay adoption of the 2031 Regional Transportation Plan (RTP) update until December 2008, or until there has been a meaningful opportunity for the public to be engaged in real transportation decision making. The new federal transportation bill, SAFETEA-LU, establishes that the current RTP is good through December 2008.

The Goal One Coalition (Coalition) believes that broad public support is essential for the continued success of Oregon's planning program, and that widespread, grass roots level citizen involvement is the key to public support and buy-in. Oregon's planning program belongs to the people of Oregon – and the first of the 19 statewide goals, Citizen Involvement, was established to ensure meaningful opportunities for public participation. The opportunities that are lacking are those associated with participating in the necessary comprehensive and functional plan updates, the plans that are expected to provide the basis for the policies and projects that are proposed for the RTP. This RTP proposal

In addition, the RTP's governing provisions for "Interested parties, participation, and consultation" in 23 CFR 450.316 requires, in relevant part:

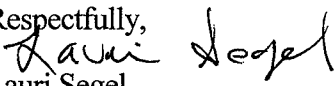
(ix) Coordinating with the statewide transportation planning public involvement and consultation processes (under subpart B of this part);

Subpart(b) establishes, in relevant part, that in developing metropolitan transportation plans and TIPs, the MPO should *consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including State and local planned growth, economic development, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities.*

The proposed RTP does not comply with the requirements of either of these provisions.

Transportation choices have a direct influence on how our community grows. We want to engage in a meaningful discussion about our community's values, our responsibility to future generations, and about the full range of options, including transportation infrastructure, for addressing future needs

One-hundred and twenty-three citizens have signed a Petition urging this Committee to delay adopting the RTP until the four steps outlined in the Petition have been completed, with a goal of adopting a revised RTP by December 2008..

Respectfully,  
  
Lauri Segel  
Community Planner

To: Central Lane Metropolitan Planning Organization

Re: Real Public Involvement in the Central Lane Regional Transportation Plan

We are writing to express our frustration with the public involvement process and to call on you to delay adoption of the regional transportation plan (RTP) update until you can engage the public in real transportation decision-making.

We care about our community's quality of life and environment, and realize that transportation choices have a direct influence on how our community grows. We want to engage in a meaningful discussion about our community's values, our responsibility to future generations, and about the transportation infrastructure and options for addressing future needs before the RTP, our regional transportation blueprint for the future, is too close to adoption for our concerns to make much difference.

We note that the 2004 RTP was adopted over the objections of numerous citizens who expressed their concerns. Work on the 2007 RTP has occurred mostly out of public view, and comments are being solicited only at the very end of the process.

Therefore, we call on you to do the following:

1. Provide the public with the basic information it needs, in plain English, for suggesting alternatives and making choices about how to invest in our regional transportation system.
2. In particular, provide the public with information about the land use assumptions in the plan, a full range of reasonable alternatives for addressing the regional transportation needs, and the performance of each of these alternatives.
3. At any staff meetings where recommendations for transportation priorities are discussed, provide public notice of the meetings in advance, an opportunity for public comments, and minutes reflecting any staff recommendations and the reasoning behind those recommendations.
4. Ask your Citizen Advisory Committee (CAC) to determine if efforts to inform and involve the public are sufficient for allowing an interested but non-technical member of the public to participate in the process and have a meaningful impact. Ask the CAC for their written comments about the RTP.
5. Delay adopting the regional transportation plan until the four steps outlined above have been completed, with a goal of adopting a revised RTP by December 2008, a time which we understand would meet new federal requirements to update the RTP every four years.

Sincerely,

The Undersigned

## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
1	Lauri Segel		642 Charnelton, #100, Eugene, OR 97401
2	Rob Handy		455-1/2 River Rd., Eugene, OR 97404
3	Chris Berner		
4	Carleen Reilly		395 Marion Ln., Eugene, OR 97404
5	Mia Nelson		40160 E. First, Lowell, OR 97452
6	Jason Schreiner		Eugene, OR
7	Guy Prouty, Ph.D.		Eugene, OR 97404
8	Jan Spencer		
9	David Saul		285 East 47 <sup>th</sup> Ave., Eugene, OR 97405
10	Neal Miller		
11	Lisa Arkin		1192 Lawrence St., Eugene, OR 97405
12	Nancy Nichols	My 82 year old parents are moving to Eugene. Try to think of this as 3 signatures.	97430
13	Nancy Miller		
14	Charles Biggs		540 Antelope Way, Eugene, OR 97401
15	Ginny Freeman		
—	Bob Freeman		
16	Dr. Stan Taylor		1285 Mclean Blvd., Eugene, OR 07405
17	Leslie Maguire		Eugene, OR 97405
18	Sandra Bishop		
19	Majeska Seese- Green	Give the public more say in prioritizing transportation projects.	Eugene, OR 97402

Note: Signatures through October 10, 2007 are listed here. Visit <http://www.PetitionOnline.com/rtp2007/petition.html> for the current list.

## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
20	Ruth Duemler		
21	Bob Cassidy		1401 E. 27 <sup>th</sup> Ave., Eugene, OR 97403
22	James Gent		Eugene, OR 97403
23	Bob Rosen		Eugene, OR 97405
24	B.K. Barr		1275 Betty Ln., Eugene, OR 97404
25	Sarah Strand		182 E. 48 <sup>th</sup> Ave., Eugene, OR 97405
26	Allen ?		Eugene, OR 97405
27	Joan Kleban		Eugene, OR 97402
28	Christopher Michaels		Eugene, OR 97402
29	Patience Pontious		Eugene, OR 97405
30	Denise-Christine (full legal name)		1355 Taft St., Eugene, OR 97402
31	Rush Wayne		Eugene, OR 97403
32	Cathy Verret		Eugene, OR 97405
33	Nancy Ellen Locke		Eugene, OR 97405
34	Carla Wenzlaff		Eugene, OR 97405
35	Jude Hobbs		Eugene, OR 97401
36	Jude Hobbs		Eugene, OR 97401
37	Debbie Todd		Florence, OR 97439
38	Daphne Stone		
39	John Herberg		1564 Mill Alley, Apt C, Eugene, OR 97401
40	Kathy G'ing		Eugene, OR
41	Kirk Giudici		Eugene, OR 97402
42	Mark Roberts		1117 W. 11 <sup>th</sup> Ave., Eugene, OR 97402

Note: Signatures through October 10, 2007 are listed here. Visit <http://www.PetitionOnline.com/rtp2007/petition.html> for the current list.

## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
43	Sara Pritt		Eugene, OR 97401
44	Dan Smellow		1049 Elkay Dr., Eugene, OR
45	Planet Glassberg		
46	Eileen Nittler		
47	Evelyn McConnaughey		1653 Fairmount Blvd., Eugene, OR 97403
48	Alice Shapiro	We are trying to start a committee here on the coast—we need help and involvement. With so many older people here, good public transportation is an absolute need.	Florence, OR 97439
49	Robert Thompson	By 'all the facts,' we'd like to know how many bus drivers will loose their jobs, how many routes dropped, how will feeder routes be developed, etc.	Eugene, OR 97402
50	Darelle B. Baker	Allow us be involved!	Eugene, OR 97405
51	H. M. Sustaita	Educating and getting the people involved should always be a first priority.	
52	Cary Thompson		
53	Joseph Vaccher		
54	Zane Ziemer		3760 Hwy. 101 N. #7 Florence, OR 97439
55	Carlos Barrera		
56	Howard Shapiro	We must have accurate information on which to base our decision before any public meeting.	Florence, OR 97439
57	Lisa Warnes	I would stress <i>real</i> public involvement.	5020 Nectar Way, Eugene, OR 97405
58	Kathy Saranpa		Friendly St., Eugene, OR 97405
59	Annie Hoag		Eugene, OR
60	Thomas Lincoln		
61	Jozef Sikiel- Zdzienicki		
62	Arthur M Farley		Fairmount Blvd, Eugene, OR 97403

Note: Signatures through October 10, 2007 are listed here. Visit <http://www.PetitionOnline.com/rtp2007/petition.html> for the current list.

## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
63	Joyce P. Gall	I heartily agree that more information and more effort to get public input is needed from those involved in the Central Lane RTP!	4810 Mahalo Dr., Eugene, OR 97405
64	Micheal Sunanda	We need bicycles.	Eugene, OR 97402
65	Mary E Otten		
66	Camille Shelton	Let's have some real dialogue about public/mass transit—improve the quality of everyone's life.	
67	David Kolb		
68	Melanie Rios		882 Almaden St., Eugene, OR 97402
69	Robin A Nelson	Let's work together!	1648 Alder St, Eugene, OR 97401
70	Alicia Swaringen		
71	Mary Addams		
72	Boz Van Houten		
73	Dirk Beaulieu		Eugene, OR
74	Catherine Lesiak		1600 E. Beacon, Eugene, OR 97404
75	Catherine Lesiak		1600 E. Beacon, Eugene, OR 97404
76	Katie Weidman		Eugene, OR 97401
77	Deborah Hebert		285 E. 47 <sup>th</sup> Ave., Eugene, OR 97405
78	John Rose	Community members have much to offer.	97401
79	Robin Szczepaniak		554 E. 13 <sup>th</sup> Alley, Eugene, OR
80	Luke Ward		1790 Alder, Eugene, OR 97401
81	Gary Heldt		3477 Onyx St., Eugene, OR 97405
82	Dr. Kent Fleming		1193 W. 5 <sup>th</sup> Ave., Eugene, OR 97402

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## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
83	Shelley Hoose		97402
84	Rand Dawson	I support the petition goal.	82820 Siltcoos St. Rd., Westlake, OR 97493
85	Ralph E. Farnsworth		
86	Audrey M. Farnsworth		
87	Phyllis Drucks	Central Transportation Planning is essential and Public Transportation is a must, absolutely.	2331 Todd St., Eugene, OR 97405
—	Jerry Drucks	Central Transportation Planning is essential and Public Transportation is a must, absolutely.	2331 Todd St., Eugene, OR 97405
88	Kellyn Gross	Please give citizens a transparent, responsible, participatory process for our transportation needs	1175 E. 25 <sup>th</sup> Ave., Eugene, OR 97403
89	David Hoffman	Maintenance <i>first</i> .	
90	Richard Koehler	Time to return to the use of railroads for passengers—peak oil will be here soon.	
91	Jan Wilson	Land use plans must be the basis for transportation and other facility planning documents.	
92	Brad Howard		Eugene, OR 97401
93	Stuart Henderson		
94	Don Norton		
95	Gwen Jaspers	More information in easy to understand language, please.	Eugene, OR 97402
96	David S. Kelly		Eugene, OR 97401
97	Michael Carrigan		1439 W. 4 <sup>th</sup> Ave., Eugene, OR 97402
98	Ellen Cantor		Eugene, OR 97402
99	Mary O'Brien	A full range of public-influenced alternatives is essential	3525 Gilham Rd., Eugene, OR 97408
100	Edward Winter		Eugene, OR, 97402
101	Shannon Wilson	Over 2500 local Sierra Club Members in the Eugene/Springfield deserve to be notified of this process and how to participate.	3920 E. 17 <sup>th</sup> Ave., Eugene, OR

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## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
102	Carla Hervert		2948 Dry Creek Rd., Eugene, OR 97404
103	Deborah Noble		
104	Michael Strasburger		
105	Chris Okray		
106	Rex Redmon	Former MPOCAC Co-chair—It's not an easy request to really evaluate the flaws in our transportation planning process, we cannot however afford not to. We must find a way to overcome this continuous cycle of racing to meet mandated plan update deadlines without staff time for real objective analysis or meaningful public involvement.	
107	Diane Bailiff	Thank you!	Florence, OR 97439
108	John Allcott	I would like our Transportation planning process to more powerfully sharpen understanding of consequences of the alternatives which our children will by necessity live with.	Eugene, OR 97403
109	Derek Phillips		
110	David Sonnichsen		2435 Skyline Blvd., Eugene, OR 97403
111	David Sonnichsen		2435 Skyline Blvd., Eugene, 97403
112	Kevin Matthews	President, Friends of Eugene	<a href="http://www.FriendsofEugene.org">www.FriendsofEugene.org</a>
113	Mark Robinowitz	Fix our "troubled bridges over water."	Eugene, OR 97405
114	Gwen Farnsworth		
115	Kate Perle		
116	Mona Linstromberg	There has been no communication with the small cities.	
117	Sarah Alexander Nunn		Eugene, OR 97402
118	Lisa Arkin		
119	Phyllis Haynes	Make the planning process more transparent instead of hiding from the public. <i>You are supposed to be serving!</i>	

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## Real Public Involvement in the Central Lane Regional Transportation Plan Petition Signatures

	Name	Comments	Address
120	Bethany Sherman		
121	Nick Baum		
122	Taylor Meizlish		Eugene, OR 97401
123	David Monk		

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# Oregon

Theodore R. Kulongoski, Governor

## Oregon Department of Transportation

73000

Area 5 Planning Office

644 "A" Street

Springfield, OR 97478

Telephone 541.747.1354

FAX 541.726.2509

E-mail: ed.w.moore@odot.state.or.us

File Code:

TO: CLMPO Transportation Planning Committee

FROM: Ed Moore, AICP  
Region 2, Area 5 Region Planner

DATE: 25 October 2007

RE: CLMPO 2031 RTP Disclaimer

Add to the front cover the following:

*Certified for Federal Planning Purposes and Compliance with SAFETEA-LU – Shall not be used or relied upon for the purpose of determining consistency with local and state land use and transportation plans, rules, regulations or programs. The list of projects contained in Table 1a of this document cannot be considered as Planned Projects under OAR 660-012-0060(4).*

Add the following language as an ODOT disclaimer on the same page entitled "Clarifying Language on Federal and State Plan Interaction":

*The 2031 Central Lane MPO Regional Transportation Plan (RTP) as contained in this document was solely prepared to meet Federal SAFETEA-LU and FHWA requirements. The 2031 RTP shall not be relied upon for land use decision making or support of land use decisions, nor shall it be used to find consistency with the Transportation Planning Rule (OAR 660-012), the newly adopted Oregon Transportation Plan, or the Oregon Highway Plan. None of the projects identified for the State Highway System as described in Table 1a have been determined by ODOT to be reasonably likely to be constructed with the 2031 planning horizon (as defined by OAR 660-012-0060(4)). Until such time as a comprehensive update of the TransPlan (as the Regional Transportation System Plan-RTSP) constrained projects list that is consistent with and based on a legally adopted 20-year land use forecast is fully adopted and acknowledged, ODOT will determine MPO area project compliance with OAR 660-012-0060(4) on a case-by-case basis.*



# Oregon

Theodore R. Kulongoski, Governor

**Department of Land Conservation and Development**

635 Capitol Street, Suite 150

Salem, OR 97301-2540

(503) 373-0050

Fax (503) 378-5518

[www.lcd.state.or.us](http://www.lcd.state.or.us)



October 26, 2007

Metropolitan Planning Committee  
 c/o Mr. Paul Thompson  
 Lane Council of Governments  
 99 E. Broadway St., Suite 400  
 Eugene, OR. 97401-3111

**Regarding: Draft 2031 Central Lane MPO Regional Transportation Plan**

Dear Metropolitan Planning Committee:

As staff indicated at your October 11 hearing, our agency has concerns about coordination and consistency between the proposed MPO plan and the adopted regional transportation system plan (TransPlan). At that time, staff indicated that they would follow up with ODOT and DLCD to discuss our concerns. Since the principal meeting to discuss our concerns is not scheduled until November 9, we wanted to explain our concerns for you.

Procedurally, we are concerned that the proposed plan has not been coordinated with a scheduled update of the region's transportation system plan – TransPlan – as required by TransPlan itself and the Transportation Planning Rule (TPR). TransPlan and the Transportation Planning Rule (TPR) anticipate that the process used to update the CLMPO plan will be simultaneously used to update TransPlan. The adopted TransPlan schedule calls for a major update in 2007. The TPR was amended just last year to require that state-required plans (in this case TransPlan) be updated whenever an update to the regional transportation plan is prepared. Based on our review of the draft plan and conversations with MPO and local staff it appears that this coordinated update of TransPlan is not happening.

On the substance, we are concerned the proposed 2031 plan does not meet several performance measures and benchmarks that are in both TransPlan and the currently adopted CLMPO plan:

- Performance measures and benchmarks related to nodal development are not reported on.
- Benchmarks for the year 2010 are not addressed;
- Adopted transportation performance measures for 2015 will not be met - even by 2031;
- The proposed 2031 plan does not identify or evaluate additional actions that would enable the region to meet the adopted benchmarks or performance measures.
- Proposed amendments would delete performance measures and several TPR related benchmarks from the MPO plan.
- The draft plan adds major highway improvements to the financially constrained project list that would appear to work against the achieving the adopted performance measures.

Metropolitan Planning Committee  
October 26, 2007  
Regarding: Central Lane MPO Regional Transportation Plan

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Page 2

These omissions are significant because of the role that performance measures and benchmarks play. Virtually identical provisions of TransPlan and the adopted RTP establish the performance measures and benchmarks and direct that they be used to guide decisions about plan implementation – including transportation investments and other actions to implement the plan. (Chapter 4 Plan Implementation and Monitoring). In essence, progress in meeting benchmarks is supposed to guide decisions about the content of the plan. It doesn't appear that this has happened.

The performance measures and benchmarks are important for state purposes because they were developed and adopted by the region to meet the TPR. They are also significant for federal purposes because the MPO plan is required to “reflect, to the extent that they exist” the area’s comprehensive long-range land use plan and metropolitan development objectives...” (CFR 450.322 (9))

A detailed outline of the relevant requirements and our concerns recommendations about the status of benchmarks and performance measures is attached.

### **Conclusion**

More work is needed to make the proposed 2031 plan consistent with adopted plans and to address relevant performance measures. We encourage you to consult further with DEQ and FHWA to determine whether adoption of the plan can be delayed to allow completion of this work. Whether or not this is possible, the proposed plan needs to clearly acknowledge these deficiencies and schedule further work over the next year to remedy these deficiencies and to assure that the plan is consistent with TransPlan as well as related state planning requirements.

We appreciate your consideration of these comments and look forward to the opportunity to work with MPO and local staff on work to resolve these concerns.

Sincerely,



Robert Cortright  
Transportation Planning Coordinator

Attachment: Detailed Comments and Recommendations on the Proposed 2031 Plan

## DETAILED COMMENTS AND RECOMMENDATIONS ON THE PROPOSED 2031 CENTRAL LANE MPO RTP

### **1. State and federal laws, as well as TransPlan, call for use of a coordinated process to address federal, state and local planning requirements**

The TPR, SAFETEA-LU, and TransPlan all expect that regional transportation planning will occur through a coordinated process.

In 2006, the Transportation Planning Rule (TPR) was amended to require local governments to update regional transportation system plans on a schedule that coincides with federally-required plan updates. This amendment was made at the request of local governments to harmonize state and federal requirements and allow local governments to respond to state and federal requirements through a single planning process. TPR requirements are set forth in OAR 660-012-0016:

“In metropolitan areas, local governments shall prepare, adopt, amend and update transportation system plans required by this division in coordination with regional transportation plans (RTPs) prepared by MPOs required by federal law. Insofar as possible, regional transportation system plans for metropolitan areas shall be accomplished through a coordinated process that complies with the applicable requirements of federal law and this division.”

Federal law and regulations include comparable requirements to consider and reflect adopted state and local plans:

#### **450.322 Metropolitan transportation planning process: Transportation plan.**

(b) In addition, the plan shall:...

(9) **Reflect, to the extent that they exist, consideration of: the area’s comprehensive long-range land use plan and metropolitan development objectives;** national, State, and local housing goals and strategies, community development and employment plans and strategies, and environmental resource plans; local, State, and national goals and objectives such as linking low income households with employment opportunities; and the area’s overall social, economic, environmental, and energy conservation goals and objectives ....

TransPlan and the TPR – as well as the Oregon Highway Plan (OHP) are relevant local and state plans that under federal law the MPO is to consider and reflect.

TransPlan requires reporting and response to performance measures at plan updates. The adopted schedule for both TransPlan and the 2002 RTP call for a major update in the year 2007. Establishment of performance measures and ongoing monitoring of progress are central features of TransPlan and the 2002 RTP. Virtually identical chapters in the existing and proposed RTP and TransPlan – Chapter 4 Plan Performance and Implementation Monitoring - establish clear requirements to use performance measures as a tool for plan implementation:

“This chapter describes how TransPlan is projected to perform and sets forth a monitoring program to assess how the plan performs over time. The monitoring program

## Detailed Comments and Recommendations: Central Lane MPO Regional Transportation Plan

ties plan goals, objectives, and policies presented in Chapter Two to the implementation of actions presented in Chapter Three. **The program also aids in tracking the plan's performance in meeting federal and state requirements.** (Chapter 4, page 1)

**“Findings that result from analysis of these performance measures will allow for informed decisions to be made as to how best implement the plan.** For example, priorities or emphasis for implementation actions may be adjusted, policies may be amended, and additional policies or implementation actions may be recommended due to performance measure outcomes.” (Chapter 4, page 1)

**“Performance measures are the primary tools for quantitatively assessing the impacts and achievements of plan implementation and are key criteria by which progress towards the plan goals can be assessed.** The performance measures provide a framework within which data that are generated and collected can be presented in a meaningful way.”

**“Results from the ongoing plan performance and implementation monitoring program will be compiled and presented to decision makers as the plan is implemented.”**

“Plan Monitoring Process: **The ongoing plan monitoring process includes the following components:**

1. Review of trends, assumptions, and new opportunities;
2. Inventory of actions taken to implement TransPlan policies;
3. **Analysis of transportation system performance using the performance measures presented above; and**
4. **Recommended actions and corrective steps, including potential plan amendments during the next update cycle.”** (page 25)

### **2. The proposed 2031 CLMPO RTP does not adequately consider and address TransPlan Performance Measures and Benchmarks**

TransPlan includes six land use and transportation performance measures to be met by the year 2015, as well as 5-year benchmarks for each performance measure to be met in 2005 and 2010. These performance measures and benchmarks were adopted to comply with the TPR and were approved by LCDC in May 2001.

The proposed 2031 CLMPO RTP includes reports on some but not all of the TransPlan performance measures and benchmarks. The table below shows the TransPlan performance measures and benchmarks and related information from the draft RTP.

For transportation performance measures, the proposed plan indicates that expected performance for 2031 will fall well short of the adopted 2015 performance measure. In rough terms, the 2031 RTP estimates the region will make half the progress in twice the time. While the RTP

## Detailed Comments and Recommendations: Central Lane MPO Regional Transportation Plan

apparently includes detailed assumptions about future land use<sup>1</sup>, it does not report on either the 2015 performance measures or the 2005 and 2010 benchmarks for nodal development.

<b>Progress in Meeting TransPlan Alternative Performance Measures</b>					
<i>TransPlan's 2005 benchmarks for transportation performance have been met, but by 2031 the region will fall well short of meeting its adopted 2015 performance measures. Progress in meeting performance measures for nodal development is not reported.</i>					
<b>Adopted Performance Measures</b>	2005 Benchmark/ status	2004 Existing Condition	2015 Performance Measure	2031 Projection	DLCD Comment
Source:	TransPlan	Draft RTP	TransPlan	Draft RTP	
<b>Transportation Performance Measures</b>					
% PH Transit mode share on Congested Corridors	6.8% <b>met</b>	7.1%	10.0%	8.6%	2031 projection is about 50% short of 2015 target
% Non auto trips	14.43% <b>met</b>	14.77%	17%	16.10%	2031 projection is about 50% short of 2015 target
Priority Bikeway Miles	15 miles <b>met</b>	18.2 miles	74 miles	54.5 miles	20.5 fewer miles of bikeway in 2031 than called for in 2015
<b>Land Use Performance Measures</b>					
Acres zoned nodal development	1000 acres ???	Not reported	2000 acres	No projection	- 2005 progress not reported - Draft RTP does not include benchmarks for 2010, 2015 or projection for 2031 - RTP proposes to defer reporting to local govts
% new dwelling units built in nodes	2.5% total 5.6% through 2005 ???	Not reported	23.3%	No projection	
% new employment in nodes	10% total 18% through 2005 ???	Not reported	45%	No projection	
<b>Other</b>					
VMT per capita (Not an adopted measure; for information only)	(n/a)	11.93 vmt	10.9 vmt	12.36	VMT per capita increases by 13% over the planning period v. 1% reduction estimated in TransPlan

Sources:

<sup>1</sup> The RTP includes detailed reporting of expected transportation performance. These results are based on the Central Lane model. To run the model, MPO staff must assign future housing units and employment to specific locations – called transportation analysis zones. The assignment process requires that staff make detailed assumptions about the location and density of planned development. While MPO staff has described this process, they have not shared the results of the allocation, and they have not reported the expected employment and housing development in nodes.

## Detailed Comments and Recommendations: Central Lane MPO Regional Transportation Plan

TransPlan: Table 7, Alternative TPR Performance Measures for the Eugene-Springfield MPO, TransPlan, July 2002, Chapter 4, page 24.

Draft RTP: Table 8, Summary of Key Performance Measures, Final Draft, Central Lane MPO RTP, September 2007, Chapter 4, page 4

### **Conclusion**

Under federal and state law, as well as the region's adopted TSP, the RTP update is to be used simultaneously as the process to guide update of local plans. Reporting on performance measures is supposed to be used to guide the plan update and refinement process: to shape the choice of investments and other actions that local governments incorporate in the updated plan. As noted above, the proposed 2031 CLMPO RTP is incomplete or inadequate in accomplishing this objective - several performance measures are not met by the plan, other performance measures are not reported on, and the plan does not include options or recommendations to enable local decision-makers to meet the adopted performance measures.

### **Recommendations**

1. The draft 2031 plan should be revised to include reporting on performance measures for the year 2015 and 5-year benchmarks for 2005 and 2010. For the land use performance measures, this should spell out assumptions about the location, amount and density of nodal development. (i.e. how many new residences and employees will be added to each node, and the expected residential density (units per acre) and employment density.
2. Based on 1, the draft 2031 plan should include an evaluation of options or additional actions or measures that would be necessary to achieve the adopted 2010 benchmarks by the year 2010 and the adopted 2015 performance measures by the year 2015. Additional actions that merit consideration include: funding for transportation improvements that support nodal development, accelerated efforts to designate areas for nodal development; additional bikeway improvement projects, additional TDM programs or measures to encourage walking, cycling and transit; and pedestrian improvements to increase access to transit.
3. In coordination with the update of TransPlan, the draft 2031 plan should be revised to include a proposed performance measure to the year 2031 and new 5-year benchmarks for the years 2020 and 2025. The performance measures and 5-year benchmarks also need to be revised to include the city of Coburg.
4. The draft 2031 plan should specifically identify issues that require policy or planning guidance from local governments to inform the next schedule RTP update.
5. Additional findings are needed to explain how major highway improvements included in the plan support the region's adopted strategy to reduce reliance on the automobile.