
From: Herb Everett
Sent: Thursday, October 21, 2004 8:48 AM
To: TAYLOR Dennis M; Central Lane Metropolitan Planning Organization; *LC Board of County Commissioners; *Eugene Mayor and City Council
Subject: Regional Transportation Plan(RTP) Update

Dear County Commissioners, Mayor Torrey, Eugene City Councilors, City Manager Taylor and the Metropolitan Policy Committee:

The timeline for the RTP update and proposed adoption is not in the public interest. The draft RTP is poorly formatted and important information is

either missing or is difficult to understand.

Additionally, it's not prudent to implement policies like Congestion Management Systems and Freight Route Designations without fully educating the public about the affect these corridor designations would have on residences, businesses and neighborhoods. Designating the McKenzie Highway as a Freight Route, for example, seems ludicrous at first glance. What would this actually mean in practice?

There needs to be better notice to the public, better information about what is being proposed and why and what is changing, and there needs to be more opportunities for public comment.

I urge you to alter the timelines for this process to better engage the public that the ultimate approval of this important plan reflects significant public input.

Sincerely,
Herbert L. Everett
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Date: November 4, 2004

From: Rob Zako, Transportation Advocate

To: Eugene City Council
Springfield City Council
Coburg City Council
Lane County Board of Commissioners
Lane Transit District Board of Directors

Cc: Central Lane MPO
Fred Patron, Federal Highway Administration
Bob Cortright, Oregon Department of Land Conservation and Development

Re: Need for cities and county to adopt the regional transportation plan

As you know, the Metropolitan Policy Committee, in its role as the policy board for the Central Lane Metropolitan Planning Organization (MPO) is scheduled to adopt an update to the Central Lane Regional Transportation Plan (RTP) at its meeting in December. The Central Lane MPO is required to do so in order to satisfy *federal* requirements.¹

In addition, there are *state* requirements that the cities and counties within the jurisdiction of an MPO adopt a regional transportation system plan (TSP).²

In the past, TransPlan satisfied both the federal and state requirements for a regional plan. In 2001, the LCOG Board of Directors (which was then the MPO policy board) adopted TransPlan for the purposes of satisfying *federal* requirements. The Eugene and Springfield City Councils, the Lane County Board of Commissioners, and the Lane Transit District Board of Directors adopted TransPlan for the purposes of satisfying *state* requirements.

The process of adopting the same plan for the purposes of meeting both federal and state requirements is a good one, as it assures consistency.

But now TransPlan fails to meet either federal or state requirements for a regional plan. It fails because it doesn't include all facilities of regional significance within the MPO boundary, which now includes the City of Coburg. And it fails because its planning horizons³ fall short of the minimum 20 years.

¹ 23 CFR 450.322 requires an MPO to adopt a financially constrained regional transportation plan addressing at least a 20-year planning horizon.

² OAR 660-012-0015(2) requires that an MPO prepare and the cities and counties within the jurisdiction of the MPO adopt a regional transportation system plan for facilities of regional significance.

³ The planning horizon for the current TransPlan, adopted in 2002/2004, is 2021 for the purposes of meeting federal requirements and 2015 for the purposes of meeting state requirements. See Chapter 1, Page 5.

In order to assure that both federal and state requirements are satisfied, I strongly urge that the Eugene, Springfield and Coburg City Councils, the Lane County Board of Commissioners, and the Lane Transit District Board of Directors each adopt the updated Central Lane RTP as their updated regional TSP for the purposes of meeting *state* requirements. Doing so is not merely a technical matter but a substantive matter.

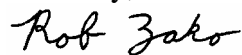
For one thing, the Central Lane MPO has no land use authority. Only the cities and county have land use authority. Thus it is important that the cities and county adopt the Central Lane RTP (or otherwise approve it) as a way to approve population growth and land use assumptions used in developing the Central Lane RTP. These assumptions go to the year 2025, ten years beyond the end of the current Eugene-Springfield Metro Plan. (I believe that the City of Coburg is in the process of updating its comprehensive plan.) Thus the Central Lane MPO has no authority to make assumptions for the last 10 years of the updated Central Lane RTP.

For another, a lack of consistency between the regional plans that satisfy federal and state requirements may result in difficulties in obtaining approvals or funding for major transportation projects.

I have spoken with both Fred Patron of the Federal Highway Administration and Bob Cortright of the Oregon Department of Land Conservation and Development. It is my understanding that both agencies recognize the importance of maintaining consistency between regional plans that satisfy federal and state requirements. The actions I suggest are the simplest, if not the only, way to assure that consistency.

If you have any questions, please feel free to contact me.

Sincerely,



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Date: November 9, 2004

From: Rob Zako, Transportation Advocate

To: Central Lane MPO

Re: Effectiveness of the public involvement process for the RTP update

Dear members of the Central Lane MPO policy board,

Discussion

Federal regulations require that:

“[T]he metropolitan transportation planning process ... [i]nclude a proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement of the public in developing plans and TIPs ...”¹

I commend your staff for their efforts to involve the public in the Regional Transportation Plan (RTP) update. They are using a variety of means to notify the public of the update and to provide detailed information. When problems have arisen (for example, when no more copies of the draft RTP were available), they have been prompt and courteous in resolving the problems. I very much appreciate their efforts.

But despite all their good efforts, I am concerned that the public involvement process hasn't been very effective. For example, few others attended the public workshop I attended on November 4. Public interest in this update has been far below that of the 2001 *TransPlan* or the 2002 amendments. (And perhaps some of you might think that isn't such a bad thing!)

What are the indicators of an effective public involvement process?

“A good indicator of an effective public involvement process is a well-informed public, which feels it has opportunities to contribute input into transportation decision making processes through a broad array of involvement opportunities at all stages of decision making. In contrast, an ineffective process is one that relies on one or two public meetings or hearings to obtain input immediately prior to decision making on developed draft plans and programs. Public meetings that are well attended, frequent news coverage on transportation issues, public forums where a broad representation of diverse interests is in attendance, and plans, TIPs, MIS alternatives, and project designs which reflect an understanding and

¹ 23 CFR 450.316(b)(1)

consideration of public input are all indicators that the public involvement process is effective.”²

By this standard, the RTP public involvement process isn’t very effective. There are only two public hearings scheduled, the second one the same day you are scheduled to adopt the RTP update. To the best of my knowledge, there has been no news coverage of the RTP update. Public meetings have not been well attended and there hasn’t been a broad representation of diverse interest.

Perhaps the public doesn’t believe that “active involvement is worthwhile” and that they can “have direct and meaningful impact on ... decisions.” After all, most people lead busy lives and only come out when they feel there is an important decision at issue.

Indeed, are you even making a decision, i.e., choosing amongst different alternatives? If the choice were between adopting the RTP update and not adopting it, then that really wouldn’t be decision. Perhaps there really are no alternatives, hence no real decision before you, hence really no need for public involvement. More precisely, perhaps there are really no important policy decisions to be made, only technical decisions that are best made by staff. As staff continues to emphasize that this is a “minor” update, maybe there is little to decide.

But the Federal Highway Administration and Federal Transit Administration note:

“Minor changes in plans ... generally can be made after the MPO ... has completed its public comment process without further opportunities for public involvement. ... However, MPOs ... should identify what are to be considered as minor changes, with the public, during the development of the public involvement process. What may appear to be minor to the public agency may not be considered minor to the public. ...”³

Recommendations

In order to better meet federal requirements for a “proactive public involvement process,” I recommend the following:

1. **Clarifying the Nature of Decision:** Staff should provide the MPO policy board and the public with a clearer summary of the nature of the decision.⁴ The summary should answer the following basic questions:
 - a. What is being adopted for what purpose?
 - b. Who is the adopting body?
 - c. What are the approval criteria, i.e., what regulations must the plan satisfy?

² “FHWA/FTA Questions and Answers on Public Involvement in Transportation Decisionmaking,” Question 3, http://www.fhwa.dot.gov/environment/pub_inv/q_and_a.htm

³ “FHWA/FTA Questions and Answers on Public Involvement in Transportation Decisionmaking,” Question 14, http://www.fhwa.dot.gov/environment/pub_inv/q_and_a.htm

⁴ The first page of the draft, “Context of Transportation Planning in the Central Lane Metropolitan Planning Organization (MPO) Area,” Figure 2, and Chapter 3, Part Three (“Regional Transportation Plan Amendment Process”) provide partial answers to these questions. But more clarity is needed.

- d. What is the affected geographic area?
 - e. What types of goals, objectives and policies, if any, are under consideration?
 - f. What types projects (regionally significant, federally funded, urban standards, etc.), if any, are under consideration?
 - g. What types of implementation strategies, if any, are under consideration?
 - h. What performance measures, if any, are under consideration?
 - i. What is the relation of the RTP to other plans? In particular, how is the RTP to be used guiding state and local decisions for plan amendments, funding decisions, implementation, etc.? Which plan applies when and where?
2. **Policy Issues and Alternatives:** Staff should provide the MPO policy board with a list of policy questions at issue in the RTP update, reasonable alternative answers to each question, and the pros and cons of each alternative. These questions should reflect the 16 factors federal regulations state “shall be explicitly considered, analyzed as appropriate, and reflected in the planning process products.”⁵ The list should also highlight outstanding challenges, for example, inadequate funding, failure to meet mobility and other performance standards, or issues that have been identified since the last adoption. If staff determines that there are no policy questions to be decided, they should indicate so. This information shall be provided to the public in advance of a public hearing.
 3. **News Story:** Staff should contact at least one local newspaper about running a story about the RTP update, ideally prior to the primary public hearing on November 18. A good reporter will want to know: “Why should the public care?” The list of policy questions should provide the answer.
 4. **Citizen Advisory Committee:** Ideally, before the adoption of the RTP update, the Citizen Advisory Committee should meet at least once and make a recommendation to the MPO policy board. If that is not feasible, staff should personally encourage each member of or applicant to the CAC to provide their own comments on the RTP update prior to adoption.
 5. **Summary of and Responses to Public Comments:** Prior to adoption of the RTP update, staff should provide a written summary of and responses to public comments in accordance with federal regulations.⁶
 6. **Readable Costs:** Staff should provide a list of projects with costs that are readable. While, in general, the legislative format is very useful, it does make the costs practically incomprehensible.

⁵ 23 CFR 450.316(a)

⁶ 23 CFR 450.316(b)(1) requires the MPO to:

“(v) Demonstrate explicit consideration and response to public input received during the planning and program development processes;” and

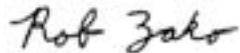
“(vii) When significant written and oral comments are received on the draft transportation plan ... (including the financial plan) as a result of the public involvement process..., a summary, analysis, and report on the disposition of comments shall be made part of the final plan ...”

Parting Words

The following words from the Federal Highway Administration, which I have shared with you before, continue to provide clear guidance for the public involvement process:

“... It has long been a challenge to grab and hold people’s interest in a project or plan, convince them that active involvement is worthwhile, and provide the means for them to have direct and meaningful impact on its decisions. ... Public involvement is more than just a hearing, or one meeting near the end of the process. It needs to be an early and continuing part of the process. It is essential to ‘know’ the community's values in order to avoid, minimize, and mitigate impacts as well as narrow the field of alternative modes (for planning) and alignments (for projects). The community also needs to understand the tradeoffs and constraints behind the process, and to ‘buy-in’ to the project. ...”⁷

Sincerely,



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⁷ <http://www.fhwa.dot.gov/environment/pubinv2.htm>



Metropolitan Transportation Priorities

Central Lane
Metropolitan Planning Organization (MPO)

2004 Central Lane Regional Transportation Plan Update

Comment Form

Please return this form to the designated box or mail to:

Paul Thompson
Lane Council of Governments
99 E. Broadway, Suite 400
Eugene Oregon 97401-3111

If you have questions about the content of the Draft *Regional Transportation Plan*, or you wish to provide additional feedback, please contact Paul Thompson, Lane Council of Governments, at (541) 682-4405 or e-mail mpo@lane.cog.or.us.

Comments

If we are planning to have a study of the Willamette, Amazon, Hilyard, Patterson to figure out how to move South Hills traffic through the area why are we changing Willamette before this study.

What is the most effective way for the MPO to communicate with you regarding regional transportation issues?

Email Web Site Newspaper Ad Postal Mail

Other (Please describe):

How can we make the transportation planning process more accessible and understandable to you?

Get info to Neighborhood organizations

If you would like to receive periodic notification of transportation-related planning events via e-mail from the Central Lane Metropolitan Planning Organization (MPO) please provide your e-mail address below.

ggsb@continet.com