



Lane Council of Governments

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December 2, 2004

To: Metropolitan Policy Committee
From: Paul Thompson
Subject: Item 4.a: Draft Regional Transportation Plan (RTP)

Action Requested: Hold public hearing on *Draft Regional Transportation Plan*; Adopt Resolution 2004-06 *Adopting an Update to the Central Lane Regional Transportation Plan*

Issue Summary

In August 2003 the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) jointly certified the Central Lane Metropolitan Planning Organization (MPO) planning process, subject to certain corrective actions and recommendations. Under the "Metropolitan Transportation Plan Development" (RTP) section, the sole corrective action stated was that the Central Lane MPO must "complete [the] next metropolitan transportation plan update (and the supporting USDOT regional air quality conformity determination) prior to December 13, 2004." Discussions between the MPO and FTA and FHWA during the certification process noted that this RTP update would be a minor update mainly intended to reflect changes to the RTP as a result of the July 2002 designation of the MPO as a Transportation Management Area (TMA) and the corresponding expansion of the MPO boundary.

Background

At the October 14, 2004 MPC meeting staff presented a *Preliminary Draft RTP* and a status report on the RTP update in progress. On that date MPC released the *Preliminary Draft RTP* for public comment and scheduled the first public hearing on the document for the November 18th MPC meeting.

At the November 18th MPC meeting, staff presented the November *Draft RTP* and an errata sheet correcting the map display and project listing of project #556, *West Bank Trail*. Staff also distributed public comment received to date, and a document showing the public outreach and involvement activities related to the RTP update. Two citizens testified on the proposed RTP update at the November public hearing. Staff responded to the public testimony during the November meeting. MPC also discussed certain elements of the November *Draft RTP* and unanimously passed a motion to retain the three policies in Chapter Two that had been proposed for elimination from the RTP.

With the exception of the correction to project #556 shown above, and a few incidental spelling and formatting improvements, the November *Draft RTP* has not been modified. Since the publication of that document, the City of Springfield has requested the inclusion of four additional projects in the RTP prior to adoption. These four additions are described below.

- On *Table 1a – Financially Constrained Roadway Projects* in the *Study* category add a Facility Plan project on Franklin Boulevard from Jenkins Lane to McVay (approximately one mile) as a Springfield project for \$500,000
- On *Table 3a – Financially Constrained Bicycle Projects* in the *Multi-Use Paths Without Road Project* category, add the following two projects:
 - MLK Parkway/PeaceHealth path
 - PeaceHealth Site path
- On *Table 3a – Financially Constrained Bicycle Projects* in the *On-Street Lanes or Routes Without Road Project* category, add a joint ODOT/Springfield project on Franklin Boulevard from the Willamette River to Brooklyn (approximately 0.25 miles) for \$600,000

The MPC's Transportation Planning Committee (TPC) recommends the inclusion of these four projects in an action to adopt the updated RTP.

Public Outreach

The October Preliminary Draft RTP was available to the public at the November 4, 2004 open house. As directed by MPC in October, staff has been implementing a more aggressive outreach on the RTP update. MPO staff sent email and postal mail notices to a distribution list of over 400 interested parties, and published a display advertisement in the newspaper, all describing the public comment period, the November 4th and December 1st open houses, as well as the November 18th and December 9th public hearings. Additional public outreach efforts were described in the *Regional Transportation Plan Public Involvement Tracking* document distributed at the November 18th MPC meeting.

At the November 4th open house approximately fourteen citizens participated in discussions of the RTP, the MTIP and the air quality analysis, as well as other regional transportation issues. To date, MPO staff has received some public comments regarding the RTP update. Comments received prior to November 18th were distributed to MPC on that date.

On December 1st a second public open house was held concurrent with an ODOT open house on the Draft FY06-09 Statewide Transportation Improvement Program (STIP). Approximately 10 people participated in the MPO's portion of the event, no public comments were received at that time. Only one written comment, from 1000 Friends of Oregon, has been received between November 18th and December 2nd and is included with this memo as Attachment 2. 1000 Friends lengthy and detailed submission arrived less than 48 hours before the deadline for preparation of this memo. A full staff response to his submission is currently being prepared and will be distributed as soon as it is complete. Any public comments received between the date of this memo and the date of the MPC meeting will be handed out at the meeting.

Adoption of the Updated RTP

On November 23, 2004 TPC reviewed the requirements for the update of the RTP and unanimously recommended that MPC adopt the update to the Central Lane RTP, including the four projects proposed for inclusion by Springfield as described above. The draft update fulfills the federal requirement to “complete [the] . . . update . . . prior to December 13, 2004” in a manner consistent with all federal regulations.

An assessment of the RTP’s compliance with federal regulations is provided as Attachment 3. The assessment is necessarily lengthy given the extensive set of requirements. However, there are three primary requirements:

- i) The RTP must be financially constrained (it is);
- ii) The RTP must conform with national air quality standards (it does); and
- iii) There must be adequate opportunity for public comment (there was)

Attachments:

Attachment 1: Resolution 2004-06 *Adopting an Update to the Central Lane Regional Transportation Plan*

Attachment 2: November 29, 2004 memo from Rob Zako, Transportation Advocate, 1000 Friends of Oregon

Attachment 3: Central Lane RTP Federal Compliance Assessment

RESOLUTION 2004-06
ADOPTING AN UPDATE TO THE CENTRAL LANE REGIONAL
TRANSPORTATION PLAN

WHEREAS, the Lane Council of Governments Board has been designated by the State of Oregon as the official Metropolitan Planning Organization (MPO) for the Central Lane region; and

WHEREAS, the LCOG Board has delegated responsibility for MPO policy functions to the Metropolitan Policy Committee (MPC), a committee of officials from Eugene, Springfield, Coburg, Lane County, Lane Transit District, and ODOT; and

WHEREAS, federal regulations require the Metropolitan Planning Organization (MPO) to adopt a long-range regional transportation plan consistent with guidelines set forth by the Federal Highway Administration and the Federal Transit Administration; and

WHEREAS, federal regulations require the MPO to update the regional transportation plan every three years and the Central Lane Regional Transportation Plan was last updated on December 12, 2001; and

WHEREAS, the regional transportation plan reflects a multimodal evaluation of transportation, socioeconomic, environmental, and financial impacts of the overall plan, including all major transportation investments; and

WHEREAS, the regional transportation plan also reflects land use, economic, and other community goals; and

WHEREAS, as a part of a coordinated regional planning effort the regional transportation plan references other types of documents, such as the TDM Refinement Plan, the Regional Intelligent Transportation Operations and Implementation Plan and the Congestion Management Plan Baseline Report, but the adoption of the regional transportation plan does not constitute adoption of these documents; and

WHEREAS, projects are listed in the MPO's Regional Transportation Plan as part of a long-range planning effort. To meet state requirements, additional action by local agencies may be required prior to programming and proceeding with implementation of projects. Listing of projects in the RTP does not necessarily constitute fulfillment of the requirements of the Oregon Transportation Planning Rule; and

WHEREAS, the primary purposes of the update are to adjust the jurisdictional area of the plan to include the City of Coburg and other parts of the urbanized area recognized by the 2000 Census, adjust the planning horizon out to 2007, and to update financial forecasts for revenue and costs; and

WHEREAS, public outreach activities associated with the proposed update to the Central Lane Regional Transportation Plan have included a press release and media notice in

October of 2004, display advertisements in the Register Guard and Springfield News newspapers in October, an open house held on November 4, 2004; an open house on December 1, 2004; and a public hearing scheduled for December 9, 2004.

NOW, THEREFORE, BE IT RESOLVED:

That the Metropolitan Policy Committee adopts the update to the Regional Transportation Plan, as set forth in Exhibit A, attached to and incorporated within this resolution by reference.

PASSED AND APPROVED THIS 9th DAY OF DECEMBER, 2004, BY THE METROPOLITAN POLICY COMMITTEE.

ATTEST:

George Kloeppe
Executive Director Metropolitan Policy Committee
Lane Council of Governments

Bonny Bettman, Chair



Date: November 29, 2004

From: Rob Zako, Transportation Advocate

To: Central Lane MPO

Re: Recommendations for the Central Lane MPO regional transportation plan (RTP) update

Dear members of the Central Lane MPO policy board,

In a previous memo dated November 4, 2004, I discussed the need for consistency between the regional transportation plan adopted by the Central Lane MPO and the transportation system plans adopted by the cities of Eugene, Springfield and Coburg, and by Lane County.

In a previous memo dated November 9, 2004, I discussed the need for an effective public involvement process for the update to the regional transportation plan.

With those preliminaries out of the way, here I address the substance of the draft update to the regional transportation plan (RTP).

I look forward to your “explicit consideration and response to [my] input,” as required by federal regulations.

Your Fiduciary Responsibility

To begin, I call attention to the unfortunate budget problems being experienced by the city of Coburg. A recent story in *The Register-Guard*¹ says, “Layoffs, across-the-board salary cuts and elimination of entire city departments are among the grim options for city officials here seeking to close a quarter-million-dollar gap between revenue and expenses.” Apparently, the City of Coburg has been spending beyond its means for years, drawing from a reserve account. Moreover, “the fund transfers from reserve accounts were included in staff budget recommendations adopted by the budget committee and council in each of the past two years.”

I don’t want to point fingers at anyone in Coburg, but it appears that someone approved budgets without looking closely enough at what staff was proposing, i.e., without upholding their fiduciary responsibility. Unfortunately, the result is that real people are being hurt in real ways.

As members of the Central Lane MPO, you, too, have a fiduciary responsibility. Broadly speaking, the update to the RTP is about money—where it comes from and where it is directed. Thus your primary decisions are about funding priorities.

At the very least, you should make sure you follow the money: know where it is coming from, where it is going, what assumptions are being made, and that everything adds up.

¹ “Bleak budget forces Coburg to make cuts,” *The Register-Guard*, 11/24/2004, http://www.registerguard.com/news/2004/11/24/d1_cr.coburgbudget.1124.html

Follow the Money: Costs

Distinction Between Programmed, Unprogrammed and Future Projects

The July 2002 *TransPlan* included an explanation of the distinction between programmed, unprogrammed and future projects (July 2002 *TransPlan*, Chap. 3, p. 7).

Mysteriously, this explanation has disappeared in the November 2004 draft RTP—and the legislative format fails to indicate the omission.

It appears that the distinction between programmed, unprogrammed and future projects has been dropped in favor of a distinction between “financially constrained” and illustrative projects. If so, the difference between this newer categorization and the categorization in the July 2002 *TransPlan* should be explained.

Recommendation: An explanation of the change in how projects are categorized should be added to the RTP.

Summaries of Costs by Mode

The July 2002 *TransPlan* includes tables that summarize capital investment actions by mode:

- Roadway Projects (July 2002 *TransPlan*, Chap. 3, p. 11)
- Transit Projects (July 2002 *TransPlan*, Chap. 3, p. 34)
- Bicycle Projects (July 2002 *TransPlan*, Chap 3, p. 38)

Mysteriously, these important summaries of costs by mode have disappeared in the November 2004 draft RTP—and the legislative format fails to indicate the omission.

Recommendation: The summaries of costs by mode should be updated and added back into the RTP.

Adding Up the Costs

Assuming the summaries of costs by mode are put back, one should be able to follow the money to see that all the costs in Chapter 3, Part One add up.

First, Table 4, “RTP Costs & Revenues and Strategies,” and Table 5, “Constrained RTP Costs & Revenues,” Chap. 3, pp. 67–68, provide the big picture.

Second, the costs in Tables 4 and 5 should match the subtotals in the (missing) summaries of roadway, transit and bicycle projects.

Third, the costs in the (missing) summaries of roadway, transit and bicycle projects should match the subtotals of specific projects in the detailed lists of capital investment actions. Note that it is not completely clear from the draft RTP how to do this third step, as some projects fall under multiple jurisdictions, and the list of capital investment actions does not indicate what share of the cost each jurisdiction will bear.

As I don’t have access to the (missing) summaries of roadway, transit and bicycle projects, I am unable to add these figures up myself.

Recommendation: Staff should provide two sets of spreadsheets, one showing that the summaries of costs by mode match up with Tables 4 and 5, and another showing that the detailed lists of capital investments actions match up with the summaries of costs by mode.

Follow the Money: Revenues

Summaries of Revenues by Source

As it was useful to have a summary of costs by mode, it would be useful to have a summary of revenues by source. These sources of funding include:

- State Highway Trust Fund,
- federal forest receipts,
- assessments and system development charges (SDCs),
- federal grants for transit and federal other federal earmarks,
- transit fare and advertising revenues,
- federal Surface Transportation Program (STP) funds,
- transportation utility fees,
- local gas taxes, and
- private sources (e.g., contributions by PeaceHealth).

In order to be able to follow the money, it is important to have a table that summarizes how much revenue is anticipated from each source, and how much of that revenue is being directed to a particular cost category in Table 5, “Constrained RTP Costs & Revenues.”

Recommendation: Summaries of revenues by source should be added to the RTP.

Adding Up the Revenues

Assuming the summaries of revenues by source are provided, one should be able to follow the money to see that all the revenues in Chapter 3, Part Two add up.

First, Table 5, “Constrained RTP Costs & Revenues,” Chap. 3, p. 68, provides the big picture.

Second, the revenues in Table 5 should match the subtotals in the (yet-to-be-provided) summaries of revenues by source.

Note that an important issue may be how funding for “programmed” projects is handled, even if the draft RTP does not categorize projects as programmed or unprogrammed. The issue is whether or not funding that is already programmed for projects counts as preexisting revenue over and above the projected revenue during the planning period. In previous discussions, I seem to recall that funding for programmed projects was counted as preexisting revenue—if so, a questionable assumption.

As I don’t have access to the (yet-to-be-provided) summaries of revenues by source, I am unable to add these figures up myself.

Recommendation: Staff should provide a spreadsheet showing that the summaries of revenues by source match up with Table 5. Staff should explain whether or not funding for “programmed” projects is over and above revenue projections.

Specific Projects

Consistency of New Projects with Transportation System Plan

As I explained in my memo dated November 4, 2004, the updated RTP is intended to satisfy federal requirements for a regional transportation plan. But this new plan does not constitute a “transportation system plan” for the purposes of satisfying state requirements contained in the Transportation Planning Rule, is not being adopted by the jurisdictions (the cities of Eugene, Springfield and Coburg, and by Lane County) that have the authority to adopt such plans, and is not being subject to the requirements of consistency with the Statewide Planning Goals.

In particular, projects that are proposed for addition to the RTP but that aren’t in the July 2002 *TransPlan* will not be in a transportation system plan. Thus under state law and rules, these projects are not eligible for construction, and may not be eligible to receive STIP funding.

As I noted in my earlier memo, the remedy is for the jurisdictions of Eugene, Springfield, Coburg and Lane County (and LTD) to separately adopt, approve or incorporate parts or all of the RTP into their transportation system plans.

These added projects that may be at risk include the following roadway projects:

- Courthouse District Transportation Improvements (Eugene/ODOT, \$7.6 million, Project #???)
- Terry Street Connector at WEP (ODOT, \$10.5 million, Project #430),
- Beltline Highway at WEP (ODOT, \$45.1 million, Project #431),
- Patterson Street Underpass (Eugene, \$11.9 million, Project #199),
- 42nd Street at Highway 126, Westbound Ramp (Springfield, \$200,000, Project #799),
- South 42nd Street at Jasper Road (Springfield, \$200,000, Project #999),
- South 42nd Street at Daisy Street (Springfield, \$200,000, Project #951),
- Airport Road Realignment (Eugene, \$2.4 million, Project #499),
- Q Street Intersection Improvements (Springfield, \$200,000, Project #828),
- Gateway/Beltline Intersection Improvements (Springfield, \$8 million, Project #789)
- North Gateway Collector (Springfield, \$1.5 million, Project #798),
- North Glenwood Collector (Springfield, \$2 million, Project #897),
- Gateway/Harlow Intersection Improvements (Springfield, \$1.3 million, Project #788),
- Diamond Street Overlay (Coburg, \$30,000, Project #1001),
- Locust Street Improvements (Coburg, \$40,000, Project #1002),
- Interstate-5 at Coburg (ODOT, \$12.5 million, Project #1003),

Recommendation: The affected jurisdictions should assess how soon they hope to obtain funding for or begin construction of these projects, and if amendments to a transportation system plan are needed.

West Eugene Parkway (Projects #336, 337, 338, 430, 431)

The total cost of the WEP has risen from \$88 million (in 1997 dollars) for four phases (Unit 1A, Unit 1B, Unit 2A and Unit 2B) in the July 2002 *TransPlan* to \$169 million (in 2004 dollars) for five phases (Unit 1A, Unit 1B, Unit 2, Beltline/WEP and Terry Street Connector) in the November 2004 draft RTP.

The increase in cost raises questions about the reason for the almost doubling in cost (neglecting inflation), and about what voters were led to believe during the November 2001 vote when they were told that the project would cost \$88 million.

More broadly, because so much money in the RTP is being directed to the WEP (and the Interstate-5/Beltline interchange project), other important projects continue to remain on the “illustrative” (or “future”) list. As such, these projects are not eligible to receive STIP funding. With each STIP cycle, the Lane County area (ODOT Area 5) struggles to find major projects for which to request funding, as the WEP is “holding up the line,” (and will likely continue to do so for much of the rest of this decade if it remains on the “financially constrained” list).²

Of course, it is a policy choice of where to direct limited transportation funds. Does the community want to hold up other projects in the hope that, someday, maybe the WEP will gain all necessary approvals, survive legal challenges and receive enough actual funding to be built enough to help with traffic problems in west Eugene?

Recommendation: Before approving an almost doubling in the amount of money directed to the WEP, the Central Lane MPO should assess the challenges facing the WEP and determine whether it continues to make sense to pursue this project.

Interstate-5/Beltline Interchange (Project #606)

The total cost of the Interstate-5/Beltline interchange project has increased from \$53 million (in 1997 dollars) in the July 2002 *TransPlan* to \$100 million (in 2004 dollars) in the November 2004 draft RTP.

Note that the estimated cost was a mere \$20 million in the February 1998 draft *TransPlan*. Also, I recall that the figure in the approved Environmental Assessment (EA) was closer to \$120 million for all phases.

The increase in cost raises questions about the reason for the almost doubling in cost (neglecting inflation). Indeed, that the cost estimate is such a round figure (\$100 million exactly) suggests that transportation planners don't know how much the project will actually cost. I surmise that they are pulling a plausible estimate out of the air.

It is also difficult to match up this single project with the various phases that are appearing in the approved 2004–2007 STIP and the draft 2006–2009 STIP. As this project is phased, the different phases should be listed separately in the RTP. Among other things, this would make it easier to compare costs with the STIP and to see what monies are paying for what improvements.

² The September 30, 2004, issue of the *Eugene Weekly* reported:

“Eugene Mayor Jim Torrey, a long-time WEP booster, said at a council meeting Sept. 22 that the Oregon Department of Transportation (ODOT) had done Eugene a ‘disservice’ by dragging out the final parkway decision for so long. Torrey said dedicating money to the WEP had diverted money from projects like relieving congestion on Beltline Highway. Torrey said Beltline, not the WEP, is the city's ‘number one’ need for road improvements. ‘We’ve lost numerous opportunities,’ Torrey said. ‘You [ODOT] need to let us know sooner rather than later whether or not this [WEP] project is going to happen.’ ”

As with the WEP, the Interstate-5/Beltline interchange project is “holding up the line” for funding for other projects. Of course, it is a policy choice of where to direct limited transportation funds. Does the community want to hold up other projects for the Interstate-5/Beltline interchange project. Is this the best use of \$100 million?

Recommendation: Before approving an almost doubling in the amount of money directed to the Interstate-5/Beltline interchange project, the Central Lane MPO should weigh its costs and benefits relative to other potential projects. In any case, the projects phases should be listed separately.

Interstate-5/Franklin Interchange (Project #150)

This is a \$31-million project on the “illustrative” list of projects. As there is interest in pursuing this project as part of the reconstruction of the Interstate-5/Willamette River bridge and as ODOT has indicated that it won’t begin an environmental impact statement until the local jurisdictions have moved this project to the “financially constrained” list,³ it is important to discuss how important this project is to the community.

More broadly, the Central Lane region can afford to plan for only a couple big roadway projects. Currently, these are the WEP and the Interstate-5/Beltline interchange. The policy choice to direct transportation investments to these areas of the community should reflect a decision by the region about where it wants to focus growth. In particular, the current choice is to direct growth away from downtown Eugene and downtown Springfield towards the Gateway and Chad Drive areas near the I-5/Beltline interchange and towards west Eugene around the West Eugene Parkway (lesser transportation improvements in both downtowns notwithstanding).

Recommendation: Before approving the RTP update, the Central Lane MPO should discuss plans for growth in the region and how major transportation investments support those plans. In particular, a discussion of the role of the two downtowns is needed.

Other Major “Illustrative” Projects

Other major “illustrative” roadway projects include:

- Highway 126 at Main Street (ODOT, \$11.1 million, Project #27),
- Highway 126 at 52nd Street (ODOT, \$11.1 million, Project #30),
- Beltline “Phase 3” (ODOT, \$21 million, #312),
- Interstate-5/Coburg interchange (ODOT, \$12.5 million, #1003),
- Interstate-5/30th Avenue (ODOT, \$18.6 million, #257),
- Highway 126, I-5 to Mohawk widening (ODOT, \$24.9 million, #728),
- Highway 126/Pioneer Parkway (ODOT, \$18.6 million, #727)
- Interstate-105, Delta Highway to Coburg Road widening (ODOT, \$11.4 million, #647),
- Interstate-105, Coburg Road to I-5 widening (ODOT, \$14.7 million, #648),
- Interstate-5, I-105 to Highway 58 widening (ODOT, \$43.3 million, #260),
- Interstate-5/Glenwood interchange (ODOT, \$12.4 million, #256),

³ See letter from Jack Lee, ODOT Region 2 Planning and Development Manager, to Springfield Mayor Sid Leiken, October 14, 2004

- Beltline Highway, River Road to Delta Highway widening (ODOT, \$16.6, #506),
- West 11th Avenue, Green Hill to Terry (ODOT/Eugene/Lane County, \$20 million, #333)

The total cost of all “illustrative” roadway capital improvement projects (including smaller ones not listed above) is \$317 million. The fact that so many projects are on the “illustrative” list and that their combined cost is so high (to say nothing about the cost of operating and maintaining existing roads) raises the question of whether or not the RTP, as drafted, will meet the transportation needs of the region. It seems clear that it won’t—that there isn’t money to do so.

Thus an important question is how the RTP proposes to address the significant gap between needs and projects. If the proposed answer is either to “secure new funding sources” or to “accept a lower levels of service,” this is an important policy decision. Frankly, getting additional money in the current economic and political climate does not seem very viable, and accepting a lower level of service raises the question of what the true transportation “needs” are.

At any rate, the continuing large gap between perceived needs and available revenues calls for a reexamination of the policy choices about how to most cost-effectively address those needs. The continuing approach of funding the WEP and the Interstate-5/Beltline interchange, both of which have doubled in cost since July 2002, seems dubious.

Recommendation: Before approving the RTP update, the Central Lane MPO should discuss the regional strategy for addressing the gap between “needs” and revenues and the strategy for making the most cost-effective investments.

Ranking Major Projects

In early 1999 during the development of *TransPlan*, the planning commissions reviewed a spreadsheet ranking close to 30 major roadway projects in terms of how well they supported the various goals and objectives of *TransPlan*. By and large, the projects that made it on to the financially constrained list for the September 2001 *TransPlan* were the higher ranked projects, and the lower ranked projects were “futures.”

As the plan is now being updated and as cost estimates have changed, in some cases dramatically, it makes sense to again review the major projects to see that those in the financially constrained plan are still those that best support the goals and objectives of the plan.

Recommendation: In consultation with the Central Lane MPO policy board and the Citizen Advisory Committee, staff should review the criteria used to rank major projects. Using these criteria, staff should evaluate and rank major projects to help assess if those in the financially constrained list are the most beneficial.

Summary of Needs Analysis

Speaking of transportation needs, the summary of the needs analysis (Chap 3, p. 3) is sketchy. In particular, the description does not explain how the projected needs in the years 2016–2025 were estimated, when the Eugene-Springfield Metro Plan goes to only 2015.

As a key reason for developing a regional transportation plan is to plan for the transportation needs of the region, it is obviously critical that the needs analysis be done carefully.

Recommendation: Staff should provide more detail on how the needs analysis was done, in particular, beyond the 2015 horizon for the Eugene-Springfield Metro Plan.

Factors to Consider

23 CFR 450.316 (“Metropolitan transportation planning process: Elements”) provides:

- a. Section 134(f) of title 23, U.S.C., and Federal Transit Act section 8(f) (49 U.S.C. app. 1607(f)) list 15 factors that must be considered as part of the planning process for all metropolitan areas. The following factors shall be explicitly considered, analyzed as appropriate, and reflected in the planning process products:
 1. Preservation of existing transportation facilities and, where practical, ways to meet transportation needs by using existing transportation facilities more efficiently;
 2. Consistency of transportation planning with applicable Federal, State, and local energy conservation programs, goals, and objectives;
 3. The need to relieve congestion and prevent congestion from occurring where it does not yet occur including:
 - i. The consideration of congestion management strategies or actions which improve the mobility of people and goods in all phases of the planning process; and
 - ii. In TMAs, a congestion management system that provides for effective management of new and existing transportation facilities through the use of travel demand reduction and operation management strategies (e.g., various elements of IVHS) shall be developed in accordance with §450.320;
 4. The likely effect of transportation policy decisions on land use and development and the consistency of transportation plans and programs with the provisions of all applicable short- and long-term land use and development plans (the analysis should include projections of metropolitan planning area economic, demographic, environmental protection, growth management, and land use activities consistent with metropolitan and local/central city development goals (community, economic, housing, etc.), and projections of potential transportation demands based on the interrelated level of activity in these areas);
 5. Programming of expenditures for transportation enhancement activities as required under 23 U.S.C. 133;
 6. The effects of all transportation projects to be undertaken within the metropolitan planning area, without regard to the source of funding (the analysis shall consider the effectiveness, cost effectiveness, and financing of alternative investments in meeting transportation demand and supporting the overall efficiency and effectiveness of transportation system performance and related impacts on community/central city goals regarding social and economic development, housing, and employment);
 7. International border crossings and access to ports, airports, intermodal transportation facilities, major freight distribution routes, national parks, recreation areas, monuments and historic sites, and military installations (supporting technical efforts should provide an analysis of goods and services movement problem areas, as determined in cooperation with appropriate private sector involvement, including, but not limited to, addressing interconnected transportation access and service needs of intermodal facilities);
 8. Connectivity of roads within metropolitan planning areas with roads outside of those areas;
 9. Transportation needs identified through the use of the management systems required under 23 U.S.C. 303 (strategies identified under each management system will be analyzed during the development of the transportation plan, including its financial component, for possible inclusion in the metropolitan plan and TIP);
 10. Preservation of rights-of-way for construction of future transportation projects, including future transportation corridors;
 11. Enhancement of the efficient movement of freight;
 12. The use of life-cycle costs in the design and engineering of bridges, tunnels, or pavement (operating and maintenance costs must be considered in analyzing transportation alternatives);
 13. The overall social, economic, energy, and environmental effects of transportation decisions (including consideration of the effects and impacts of the plan on the human, natural and man-made environment such as housing, employment and community development, consultation with appropriate resource and permit agencies to ensure early and continued coordination with environmental resource protection and management

plans, and appropriate emphasis on transportation-related air quality problems in support of the requirements of 23 U.S.C. 109(h), and section 14 of the Federal Transit Act (49 U.S.C. 1610), section 4(f) of the DOT Act (49 U.S.C. 303) and section 174(b) of the Clean Air Act (42 U.S.C. 7504(b));

14. Expansion, enhancement, and increased use of transit services;
15. Capital investments that would result in increased security in transit systems; and
16. Recreational travel and tourism.

* * *

In the draft RTP, I don't see that these factors have been "explicitly considered, analyzed as appropriate, and reflected in the planning process products."

Recommendation: Staff should provide more detail on how these factors were explicitly considered, analyzed as appropriate, and reflected in the planning process.

Regulatory Framework

Speaking of regulations, the February 1998 draft *TransPlan* had an excellent Appendix E ("Federal, State and Regional Requirements") that spelled out in great and useful detail what regulations *TransPlan* must comply with.

Unfortunately, this excellent appendix was dropped in the later May 1999 revised draft *TransPlan*, the adopted September 2001 *TransPlan*, and the amended July 2002 *TransPlan*. In its place, these later versions included two sections in Chapter 1 entitled "*TransPlan* Legal Status and Adopted Sections" and "Regulatory Framework and Ongoing Nature of Regional Transportation Planning." These sections were more descriptive and less specific. In particular, these sections did not items the factors discussed above that must be "explicitly considered, analyzed as appropriate, and reflected in the planning process products."

Now the November 2004 draft RTP proposes to eliminated even these descriptive sections altogether.

Recommendation: Section entitled "*TransPlan* Legal Status and Adopted Sections" and "Regulatory Framework and Ongoing Nature of Regional Transportation Planning" should be added back into the RTP and revised as appropriate. These sections should be expanded or an appendix should added to explicitly list the governing regulations.

Conclusion

Because of time constraints, I have not had an opportunity to review all of the RTP in detail. Moreover, it should not be solely my responsibility to do so. Yet, I suspect that I might be the only citizen who has taken the time to read the RTP in much detail.

But the development of the RTP should have been coordinated with a Citizen Advisory Committee, and that group should have reviewed each major section of the RTP over several meetings, flagging issues that demand further discussion by officials and the public.

As it is, I have focused on the first two parts of Chapter 2 that deal with money and capital investment actions. I regret that I have not had time to look closely at other parts of the plan.

While the update to the RTP has been termed "minor," it should be clear that it raises major issues about the growth of the region and how the transportation needs of the region are to be met. In particular, the large increase in estimated costs for a few major projects and the large number of "illustrative" projects should raise serious policy questions.

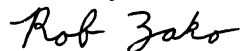
At a minimum, the update to the RTP is required to satisfy applicable federal regulations for metropolitan transportation planning.

As the above comments indicate, staff still has significant work to do to ready the draft for adoption. The members of the Central Lane MPO policy board have yet to adequately address significant policy questions.

1000 Friends of Oregon applauds the efforts to date of the Central Lane MPO to plan for the regional transportation needs. We urge you to stay the course and to develop a plan that best meets those needs.

If you have any questions or comments, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Rob Zako". The signature is written in a cursive, slightly slanted style.

Rob Zako
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