

ATTACHMENT B

FINDINGS OF COMPLIANCE – OAR 731-015-0065

1. Coordination Procedures for Adopting Final Facility Plans

The State Agency Coordination rule requires that the Oregon Transportation Commission (OTC) adopt findings of fact when adopting facility plans. (OAR 731-015-065). ODOT in coordination with the City of Medford and Jackson County, developed an IAMP for the new Interstate 5 Interchange 27. Staff is requesting that the OTC adopt the IAMP as a facility plan pursuant to OAR 731-015-0065.

Pursuant to these requirements, the Oregon Department of Transportation (ODOT or Department) provides the following findings to support the OTC adoption of the South Medford Interchange Area Management Plan (SMI IAMP).

(1) Except in the case of minor amendments, the Department shall involve DLCD and affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and other interested parties in the development or amendment of a facility plan. This involvement may take the form of mailings, meetings or other means that the Department determines are appropriate for the circumstances. The Department shall hold at least one public meeting on the plan prior to adoption.

Finding: The South Medford Interchange Area Management Plan (SMI IAMP) was prepared with participation from the City of Medford, Oregon Department of Transportation (ODOT), Jackson County, the Department of Land Conservation and Development (DLCD) and the Rogue Valley Metropolitan Planning Organization. Other stakeholders and the general public were also given numerous opportunities to provide input.

The IAMP Technical Advisory Committee was comprised of representatives from ODOT, the City of Medford, the Oregon Department of Land Conservation and Development (DLCD), the Rogue Valley Metropolitan Planning Organization, and Jackson County. This group met seven times and actively participated in the plan development process. Meeting dates and locations are listed as follows:

Meeting Date	Location
September 16, 2004	Medford Public Library
November 16, 2004	Medford City Hall
April 12, 1005	Medford City Hall
May 25, 2005	Medford City Hall
December 29, 2005	Telephone conference
April 6, 2006	Medford City Hall
February 26, 2007	Medford City Hall

A public open house and meeting was held in the Medford City Hall on May 25, 2005, to introduce the concept of the IAMP and to enable public comment. Prior to the meeting, ODOT issued a news release which was published in the Medford Mail Tribune, announcing the public meeting.

In addition, five informational presentations were made before City of Medford bodies in the Medford City Hall. Agendas for these meetings were placed on the City's website prior to the meeting date and these meetings were open for public attendance. Meeting dates and type are listed below.

Meeting Date	Location
November 11, 2004	City Council
January 25, 2006	Joint Transportation Subcommittee
February 26, 2007	Medford Planning Commission & Joint Transportation Subcommittee
September 13, 2007	City Council
September 20, 2007	Planning Commission

(2) The Department shall provide a draft of the proposed facility plan to planning representatives of all affected cities, counties and metropolitan planning organization and shall request that they identify any specific plan requirements which apply, any general plan requirements which apply and whether the draft facility plan is compatible with the acknowledged comprehensive plan. If no reply is received from an affected city, county or metropolitan planning organization within 30 days of the Department's request for a compatibility determination, the Department shall deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan. The Department may extend the reply time if requested to do so by an affected city, county or metropolitan planning organization.

Finding: On September 21, 2007, letters requesting a compatibility determination were sent by US Mail to the affected jurisdictions of Medford and Jackson County, to the Rogue Valley Metropolitan Planning Organization (RVMPO) and to the Department of Land Conservation and Development (DLCD). Included in the package with the letter was a copy of the draft South Medford IAMP, dated September 18, 2007. Letters received from notified jurisdictions are summarized below and included as Attachments.

A letter dated October 22, 2007 was received from the City of Medford. This letter states that the IAMP "appears to be consistent with the goals, policies, and implementation strategies of the Medford Comprehensive Plan, including the 2003 Transportation System Plan and with ordinance language in the Medford Land Development Code." The letter further stated that "We encourage the

Oregon Transportation Commission to adopt the South Medford IAMP.” This letter is included as Attachment D.

A letter dated October 19, 2007 was received from the Rogue Valley Metropolitan Planning Organization. This letter states that “Staff has reviewed the plan and finds that it is consistent with goals, policies and other provisions of the 2005-2030 Regional Transportation Plan.” This letter further states that “...travel-demand forecasts used in this IAMP were completed using assumptions obtained from the RVMPO regional travel demand model, consistent with the RVMPO 2005-2030 Regional Transportation Plan.” This letter is included in Attachment E.

No written comment was received from Jackson County in response to the letter sent to them on September 21, 2007. OAR 731-015-0065 provides that if no comment is received from a notified jurisdiction within 30 days of the Department’s request for a compatibility determination, the Department shall deem that the draft plan is compatible with that jurisdiction’s acknowledged comprehensive plan. Based upon this provision it may be determined that the South Medford IAMP is consistent with goals and policies of Jackson County’s Comprehensive Plan.

A letter dated October 19, 2007 was received from the DLCD. This letter requested that the IAMP be amended to include policy language that would tie approval of new land uses in the IAMP study area, to the land use assumptions used for the IAMP. Department response to this request is covered in the finding under (3) which follows. Both the letter and the Department response are included in Attachment E.

(3) If any statewide goal or comprehensive plan conflicts are identified, the Department shall meet with the local government planning representatives to discuss ways to resolve the conflicts.

Finding: The DLCD submitted a letter dated October 19, 2007, indicating that the IAMP should include policy language to connect the approval of new development with the land use assumptions in the IAMP. The letter stated that new development should not exceed land use assumptions in the IAMP unless the IAMP is amended to reflect the new assumptions. Department response clarified that the traffic analysis for the IAMP was based upon the regional traffic forecasting model that was used for both the Environmental Impact Statement (EIS) for the new interchange and for the 2005-2030 Regional Transportation Plan (RTP). Consistency between the IAMP, the EIS and the RTP is an important component of the planning process. Also, the traffic analysis for the SPUI conducted for both the traffic anticipated in the RTP and for an alternative scenario that added even more trips, indicated that OHP mobility standards would clearly be met in 2030. Even so, the IAMP still includes a management measure that recognizes the importance of continuing to implement the effective Access Management Strategy that is being built into the project. A second management measure recommends that the IAMP be adopted with City TSP policies and ordinance language that further serve to protect the facility. Any

amendment to these local policies or code language would require that the OTC approve a corresponding amendment to the IAMP. It is ODOT's position that the SPUI has been designed to function consistent with OHP mobility standards and that the IAMP contains adequate additional protection for the SPUI's function.

(4) The Department shall evaluate and write draft findings of compatibility with acknowledged comprehensive plans of affected cities and counties, findings of compliance with any statewide planning goals which specifically apply as determined by Oregon Administration Rule (OAR) 660-030-0065(3)(d), and findings of compliance with all provisions of other statewide planning goals that can be clearly defined if the comprehensive plan of an affected city or county contains no conditions specifically applicable or any general provisions, purposes or objectives that would be substantially affected by the facility plan.

Finding: These findings are submitted for the Commission's consideration in the following sections.

- Section 2 – Compatibility with Acknowledged City and County Comprehensive Plans (Medford and Jackson County)
- Section 3 – Compliance with Applicable Statewide Planning Goals (Goal 1: Citizen Involvement, Goal 2: Land Use Planning, Goal 11: Public Facilities, Goal 12: Transportation and Goal 14: Urbanization)
- Section 4 - Consistency with the Oregon Transportation Plan (2006) and other Modal Plans (Oregon Highway Plan, 1999)
- Section 5 – Compatibility with the Rogue Valley Metropolitan Planning Organization (2005-2030 Regional Transportation Plan)

(5) The Department shall present to the Transportation Commission the draft plan, findings of compatibility with the acknowledged comprehensive plans of affecting cities and counties and findings of compliance with applicable statewide planning goals.

Finding: The Final Draft of the Facility Plan is attached as Attachment C for the Commission's consideration. The following findings address compliance with applicable statewide planning goals. Findings are also made for consistency with the acknowledged comprehensive plans of the affected city and county. The Department has received a letter affirming consistency with the Comprehensive Plan including the Transportation System Plan and the Land Development Code of the City of Medford. That letter is included as Attachment D.

(6) The Transportation Commission shall adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties, and findings of compliance with applicable statewide planning goals when it adopts the final facility plan.

Finding: These findings are submitted for the Commission's consideration. These findings address compliance with applicable statewide planning goals and compatibility with the acknowledged comprehensive plans of the City and County.

(7) The Department shall provide copies of the adopted final facility plan and findings to DLCDD, to affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and to others who request to receive a copy.

Finding: The Department will provide copies of the adopted IAMP, including all required findings, to the DLCDD, the affected metropolitan planning organization, the affected local jurisdictions and to others who request a copy.

2. Compatibility with Acknowledged City and County Comprehensive Plans

Pursuant to OAR 731-015-0065(2), letters requesting a compatibility determination were sent by US Mail to the affected jurisdictions of Medford and Jackson County. A letter dated October 22, 2007 was received from the City of Medford, stating that the IAMP was consistent with the goals, policies, and implementation strategies of the Medford Comprehensive Plan, including the 2003 Transportation System Plan and with ordinance language in the Medford Land Development Code. This letter is included as Attachment D.

No written comment was received from Jackson County in response to the letter sent to them on September 21, 2007. OAR 731-015-0065 provides that if no comment is received from a notified jurisdiction within 30 days of the Department's request for a compatibility determination, the Department shall deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan. Based upon this provision and the following findings, it may be determined that the South Medford IAMP is consistent with goals and policies of Jackson County's Comprehensive Plan.

City of Medford

The City of Medford Comprehensive Plan was adopted in 1975 and was last updated in 1997, with a planning period target date of 2010. Most of the land within the IAMP study area is within the jurisdiction of the City of Medford. There are transportation-related policies that refer to automobile, street hierarchy and development, public transportation, bicycle transportation, pedestrian access and coordination with the Medford Airport.

The Medford TSP establishes the City's short and long-term goals and objectives for meeting existing transportation needs and includes short, medium and long-range projects. The South Medford Interchange project is listed as an ODOT Tier 1 short-range (2004-2008) improvement (project number 3, TSP Table 13-2). The TSP also addresses planning for future growth and improvements necessary for providing an effective multimodal transportation system. One of the fundamental strategies of the TSP is to reduce reliance on the automobile by promoting changes in land use patterns and transportation systems that make it more convenient for people to walk, bicycle, use transit, and drive less to meet their daily needs.

The Medford TSP has eight goals with accompanying policies and implementation strategies. The IAMP includes the following goals and policies, which support protection of the interchange function:

Goal 2: To provide a comprehensive street system that serves the mobility and multi-modal transportation needs of the Medford planning area.

Policy 2-G: The City of Medford shall undertake efforts to reduce per capita vehicle miles traveled (VMT) and single-occupancy vehicle (SOV) demand through TDM strategies.

Policy 2-M: The City of Medford shall undertake efforts to contribute to a reduction in the regional per capita parking supply to promote the use of alternatives to the single occupancy motor vehicle.

Goal 8: To maximize the efficiency of Medford's transportation system through effective land use planning.

Policy 8-B: The City of Medford shall undertake efforts to increase the percentage of dwelling units and employment located in Medford's adopted TODs, consistent with the targeted benchmarks in the Alternative Measures of the RTP.

Findings: The TSP identifies the South Medford interchange project as a short-term Tier One improvement (project number 3, Table 13-2). The TSP also states that a key element of the project is the development of an IAMP for the new interchange. The City of Medford provided input on the population and employment data used in the regional transportation forecasting model used for the IAMP traffic analysis. ODOT coordinated with the City of Medford throughout the IAMP planning process and representatives from the City of Medford served on the IAMP TAC. The IAMP preparation process, including the TAC meetings, provided a forum for discussing issues related to land use. Based on the traffic operations analysis, the IAMP concluded that only two management measures were recommended to protect the function of the interchange for the 20-year planning period.

Management Measure #1 of the IAMP requires that ODOT continue to implement the Access Management Strategy – South Medford Interchange Project, 2003, which was developed in the design phase of the project.

Management Measure #2 includes the goals and policies from the Medford TSP (listed above) and ordinance language from the Land Development Code that support the protection of the new interchange. The policies cited above, which are directed at reducing VMT and reliance upon SOVs, work to reduce traffic congestion both on local streets and on the new interchange. Encouraging more intense development in Transit Oriented Development areas, which contain mixed uses, bike and pedestrian facilities and transit service, will benefit both the interchange and the local street network, by reducing vehicle use and congestion. All of Medford's identified TODs are located outside the South Medford Interchange study area, which assures the City's intent to focus future development to areas outside the interchange area.

City of Medford Land Development Code (2001)

Land Development Code Sections 10.146 (Referral Agencies, Distribution), 10.227 (Zone Change Criteria), Section 10.462 (Maintenance of level of Service D) and 10.744 (Joint Use of Parking Facilities) support management measures that will serve to protect the function of the new interchange. These sections are as follows:

Section 10.146 Referral Agencies, Distribution: Establishes the types of plan authorizations that the City notifies other agencies for review. This section requires the City Planning Department to notify ODOT regarding all major comprehensive plan amendments or amendments to the City's TSP. ODOT is also notified when other land use actions (including zone changes, Planned Unit Developments, land divisions and site plan reviews) occur in the proximity or adjacent to a state facility.

Section 10.227 Zone Change Criteria: Requires applicants to demonstrate that Category A urban services or facilities are available, or can and will be provided for the subject property. Streets and street capacity must be provided by either i) streets that presently exist and have adequate capacity, ii) existing streets that will either be improved or new streets constructed to provide adequate capacity, by the time of building permit issuance, iii) for streets that must be constructed or improved, the Planning Commission may find that the street to be adequate if improvements are fully funded, iv) for streets that need to be improved, specific improvements must be identified and demonstrated to result in street adequacy.

Section 10.462 Maintenance of Level of Service D: Whenever level of service is determined to be below level D for arterials or collectors, development is not permitted unless the developer makes the roadway or other improvements necessary to maintain level of service D respectively.

Finding: The requirement for ODOT notification enables ODOT planners and engineers to review development proposals that could affect state facilities, to require the completion of traffic impact studies assessing the impact and to apply appropriate mitigation to manage the impact from development. The requirements for adequate facilities, particularly when these improvements occur in the interchange's management area, assure the provision of a suitable local street network that will effectively handle local traffic and protect the function of the interchange. The requirement for the maintenance of Level of Service D will also assure that the function of local streets is protected to enable them to serve as a viable alternative to state facilities. The City of Medford has issued a letter dated October 22, 2007, stating that the IAMP is consistent with the City's TSP and Land Development Code, and that the City supports the OTC adoption of the SMI IAMP.

Jackson County

The Jackson County Comprehensive Plan was originally adopted in 1972. The County Board of Commissioners approved amendments to the plan on January 12, 2004, which became effective March 12, 2004. The County's Comprehensive Plan is the official long-range land use policy document for Jackson County. The plan sets forth general land use planning policies and allocates land uses to resource, residential, commercial and industrial categories. The plan serves as the basis for the coordinated development of physical resources and the development or redevelopment of the county based on physical, social, economic and environmental factors.

The update of the Jackson County TSP was approved on March 15, 2005 and went into effect on May 15, 2005. The TSP has livability, modal components, and integration goals with associated policies and strategies to implement each goal. The livability goal is "to develop and maintain a safe and multi-modal transportation system capable of meeting the diverse transportation needs of Jackson County while minimizing adverse impacts to the environment and to the County's quality of life." There are no policies or strategies related to this goal specifically applicable to the interchange project. However, the TSP does include policies to support freight mobility and coordination between the County and ODOT. There are also bicycle and pedestrian-related policies applicable to the project area listed in TSP Section 4.2.4-A,d. The South Medford Interchange Reconstruction Project will address these TSP pedestrian and bicycle policies by including pedestrian and bicycle amenities on the Highland-Garfield connector which is the crossroad for the new interchange.

Findings: A portion of the IAMP study area, which is outside of the Medford city limits, is in the UGB and under Jackson County jurisdiction. The majority of these parcels are located along the railroad tracks and south of Barnett Road. The majority of county land is designated for industrial and commercial uses.

ODOT coordinated with Jackson County throughout the IAMP planning process. Jackson County provided input on the population and employment data used in the regional transportation forecasting model used for the IAMP traffic analysis. A representative from the Jackson County Roads Department served on the IAMP TAC. The IAMP preparation process, including the TAC meetings, provided a forum for discussing issues related to land use. Based on the traffic operations analysis, the IAMP concluded that no land use actions were needed to protect the function of the interchange for the 20-year planning period.

3. Compliance with Applicable Statewide Planning Goals

Relevant statewide planning goals adopted by the LCDC include: Goal 1 (Citizen Involvement); Goal 2 (Land Use Planning); Goal 11 (Public Facilities); Goal 12 (Transportation); and Goal 14 (Urbanization).

Goal 1: Citizen Involvement

Goal 1 requires that citizens have the opportunity to be involved in all phases of the planning process. For the IAMP's planning process, Goal 1 requires that ODOT enable public involvement in the plan development process.

Finding: The South Medford Interchange Area Management Plan (SMI IAMP) was prepared with participation from the City of Medford, Oregon Department of Transportation (ODOT), Jackson County, the Department of Land Conservation and Development (DLCD) and the Rogue Valley Metropolitan Planning Organization. Other stakeholders and the general public were also given numerous opportunities to provide input. The IAMP Technical Advisory Committee was comprised of representatives from ODOT, the City of Medford, the Oregon Department of Land Conservation and Development (DLCD), the Rogue Valley Metropolitan Planning Organization, and Jackson County. This group met seven times and actively participated in the plan development process. Meetings dates and locations are listed in the findings of compliance with the Coordination Procedures, Section 1.

A public meeting was held in the Medford City Hall on May 25, 2005 to introduce the concept of the IAMP and to enable public comment. Prior to the meeting, ODOT issued a news release in the Medford Mail Tribune, announcing the public meeting. In addition, five informational presentations were made before City of Medford bodies in the Medford City Hall. Meeting dates and groups are also listed in the findings of compliance with the Coordination Procedures, Section 1. Agendas for these meetings were placed on the City's website prior to the meeting date and these meetings were open for public attendance. As both agency representatives and the general public were given a variety of opportunities for involvement in the IAMP development process, the process can be found to be consistent with Goal 1.

Goal 2: Land Use Planning

Goal 2 requires planning coordination between those local governments and state agencies "which have programs, land ownerships, or responsibilities within the area included in the plan." In this case, Goal 2 requires that ODOT coordinate with the City of Medford, Jackson County, the RVMPO, and the DLCD. Goal 2 also requires that a land use planning process and policy framework be established as a basis for all decisions and actions relating to the use of land.

Finding: The majority of the study area is within the City of Medford UGB, which has planning authority over the area, although there are also some pockets of land within the study area that remain under Jackson County planning authority. The City of Medford recently annexed some of the county parcels within the study area. The entire Rogue Valley area is designated as a metropolitan area and is served by the RVMPO. ODOT coordinated with the Rogue Valley Metropolitan Planning Organization (RVMPO), Jackson County, and the City of Medford throughout the IAMP planning process. RVMPO, Jackson County, and the City of Medford provided input regarding population and employment data for the regional transportation forecasting model that was used for the IAMP traffic

analysis. Representatives from RVMPO, Jackson County, the City of Medford and the DLCDC served on the IAMP TAC. The IAMP preparation process, which including the TAC meetings, a public meeting and presentations before Medford City bodies, provided a forum for discussing issues related to land use.

TAC jurisdictions and agencies were also given the opportunity to comment on the draft plan. These Coordination Procedures are discussed in Section 1. The IAMP can be found consistent with the plans and policies of the City of Medford, Jackson County, and the Rogue Valley Metropolitan Organization.

DLCDC comment requested the addition of policy language to the IAMP, stating that new development should not exceed land use assumptions in the IAMP unless the IAMP is amended to reflect the new assumptions. Department response clarified that the traffic analysis for the IAMP was based upon the regional traffic forecasting model that was used for both the Environmental Impact Statement (EIS) for the new interchange and for the 2005-2030 Regional Transportation Plan (RTP). Consistency between the IAMP, the EIS and the RTP is an important component of the planning process. Also, the traffic analysis that was conducted both for traffic anticipated in the RTP and for an alternative scenario that added even more trips, indicated that OHP mobility standards would clearly be met in 2030. Even so, the IAMP still includes a management measure that recognizes the importance of continuing to implement the effective Access Management Strategy that is being built into the project. A second management measure recommends that the IAMP be adopted with City TSP policies and ordinance language that further serve to protect the facility. Any amendment to these local policies or code language would require that the OTC approve a corresponding amendment to the IAMP. It is ODOT's position that the SPUI has been designed to function consistent with OHP mobility standards and that the IAMP contains adequate additional protection for the SPUI's function. The IAMP can be found to be consistent with Goal 2.

Goal 11: Public Facilities and Services

Goal 11, Public Facilities and Services, requires cities and counties to plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development. The goal requires that urban and rural development be "guided and supported by types and levels of urban and rural public facilities and services appropriate for, but limited to, the needs and requirements of the urban, urbanizable and rural areas to be served."

Finding: The purpose of the South Medford Interchange Reconstruction Project is to reduce congestion while improving both the function and safety of the interchange. The goals of the IAMP are to "maintain the function of the interchange over the 20-year planning period to preserve the investment in the facility" and to "minimize the need for future major improvements to the interchange." The IAMP traffic analysis is based on the population and employment data used in the 2005-2030 Regional Transportation Plan. The traffic analysis confirmed that the new Single Point Urban Interchange (SPUI) will

meet ODOT mobility standards in 2030, using the RTP assumptions for population and employment growth. The IAMP is consistent with Goal 11.

Goal 12: Transportation

Goal 12, Transportation, requires cities, counties, MPOs, and ODOT to provide and encourage a safe, convenient and economic transportation system. This is accomplished through development of TSPs based on inventories of local, regional and state transportation needs. Goal 12 is implemented through OAR 660, Division 12, the Transportation Planning Rule (TPR). The TPR requires local governments to adopt land use regulations consistent with state and federal requirements “to protect transportation facilities, corridors and sites for their identified functions (OAR 660-012-0045(2)).” A major purpose of the TPR is to promote more careful coordination of land use and transportation planning, to assure that planned land uses are supported by and consistent with planned transportation facilities and improvements.

OAR 660-012-0060, Plan and Land Use Regulation Amendments requires action by the local government when a plan amendment or land use regulation significantly affects a transportation facility. An amendment or regulation significantly affects if it “reduces the performance of an existing or planned transportation facility below the minimum acceptable performance standard identified in the TSP or comprehensive plan” (section (1)(c)(B)).

660-012-0060 (3) (d) does not allow a local government to approve an amendment for a property located in an interchange area that would significantly affect a facility without assuring that land uses are consistent with facility standards. Section (4)(d) (C)(ii) defines an interchange area as designated in an adopted IAMP.

Finding: The TPR Plan and Land Use Regulation Amendments section (OAR 660-012-0060) provides protection for the function of the SMI. The OHP identifies the minimum acceptable performance standard for I-5 as 0.80 volume-to-capacity (v/c) ratio. Upon OTC adoption of the SMI IAMP, the City of Medford will be required to implement one or more measures listed in section 660-012-0060 (2) if it approves a plan amendment or land use regulation that would reduce the performance of I-5 below 0.80 or the SMI ramps below 0.85 v/c. The five allowable measures are to demonstrate that land uses would be consistent with the facility, amend the TSP to provide improvements, alter land use regulations to reduce demand, amend the TSP to modify the facility standards, or require TSM or TDM measures or improvements (including timing) as a condition of development. These measures reflect some of the potential management actions listed in Section 7 and Appendix A of the SMI IAMP. In addition, 660-012-0060 (4) requires local governments to coordinate with the affected transportation facility provider in making the determination of effect. Therefore, the City of Medford must coordinate with ODOT in determining whether a plan amendment or regulation would significantly affect I-5 or the SMI.

Using the forecast population and employment values from the RTP and the traffic volumes forecast using the regional traffic model, the operational analysis

showed that the SPUI would meet ODOT mobility standards in year 2030 (20-year operational life). In addition, analysis also was conducted for an alternative development scenario that assumed more residential development and a higher trip generation from employment uses in the study area than contained in the regional transportation model. Both of these two analyses ensured that the planned land uses assumed in the RTP and City of Medford comprehensive plan would be supported by and are consistent with the capacity of the new SPUI.

However, to assure that the SPUI is protected through and beyond the planning period, the IAMP recommends the application of two management measures. Management Measure #1 of the IAMP requires that ODOT continue to implement the Access Management Strategy – South Medford Interchange Project, 2003, which was developed in the design phase of the project. IAMP Management Measure #2 requires that goals and policies from the Medford TSP and Land Development Code language be included in the adopted IAMP. The IAMP is consistent with Goal 12 and the TPR.

Goal 14: Urbanization

Goal 14, Urbanization, requires an orderly and efficient transition from rural to urban land use. This is accomplished through the establishment of urban growth boundaries (UGBs) and unincorporated communities. UGBs and unincorporated community boundaries separate urbanizable land from rural land. The compact development that Goal 14 fosters helps contain the costs of public facilities such as transportation by reducing the need for facilities further out and helping jurisdictions better anticipate where growth will occur.

Finding: The IAMP study area is entirely within the UGB. The study area includes parcels under Jackson County jurisdiction, most of which are industrial and commercial. The City of Medford recently annexed some of the parcels within the UGB and designated them SFR-00 and C-R. The IAMP traffic analysis uses the same land use assumptions about the parcels as the RTP, which RVMPO developed in agreement with Jackson County, the City of Medford, and ODOT. The IAMP is consistent with Goal 14.

4. Compatibility with Other Modal Plans and the OTP

Oregon Transportation Plan (2006)

The Oregon Transportation Plan (OTP) is a policy document developed by ODOT in response to the federal and state mandates for systematic planning for the future of Oregon's transportation system. The OTP is intended to meet the statutory requirements of ORS 184.618(1), to develop a state transportation policy and comprehensive long-range plan for a multi-modal transportation system that addresses economic efficiency, orderly economic development, safety and environmental quality.

Finding: The OTP does not specifically address improvements to the South Medford Interchange, but offers a broad policy framework and standards for

improving state highway systems. The IAMP has been developed to be compatible with the OTP, specifically the Oregon Highway Plan which is an element of the OTP.

Oregon Highway Plan (1999)

The Oregon Highway Plan (OHP), a modal element of the OTP, establishes policies and investment strategies for Oregon's state highway system over a 20-year period and refines the goals and policies found in the OTP. Policies in the OHP emphasize the efficient management of the highway system to increase safety and to extend highway capacity, partnerships with other agencies and local governments, and the use of new techniques to improve road safety and capacity. These policies also link land use and transportation, set standards for highway performance and access management, and emphasize the relationship between state highways and local roads, bicycle, pedestrian, transit, rail, and air systems. Findings for the applicable goals and policies are as follows;

Goal 1 - System Definition

Policy 1A - State Highway Classification System

This policy calls for ODOT to apply the state highway classification system to guide priorities for system investment and management.

Finding: The OHP classifies I-5 as an Interstate Highway. In 1995, the U.S. Congress established the National Highway System (NHS), which classifies the roadways in each state that are critical to the movement of interstate commerce. I-5 is part of the NHS system. The South Medford Interchange Reconstruction Project and the SMI IAMP support the interstate classification by demonstrating that mobility standards will be met for at least the 20-year planning period.

Policy 1B - Land Use and Transportation

This policy recognizes the role of both the State and local governments related to the state highway system and calls for a coordinated approach to land use and transportation planning.

Finding: Coordination with local jurisdictions occurred throughout the preparation of the IAMP. The IAMP Technical Advisory Committee was comprised of representatives from ODOT, the City of Medford, the Oregon Department of Land Conservation and Development (DLCD), the Rogue Valley Metropolitan Planning Organization, and Jackson County. This group met seven times and actively participated in the plan development process. Meetings dates and locations are listed in the findings of compliance with the Coordination Procedures, Section 1.

TAC jurisdictions and agencies were also given the opportunity to comment on the draft plan. These Coordination Procedures are discussed in Section 1. The IAMP can be found consistent with the plans and policies of the City of Medford, Jackson County, and the Rogue Valley Metropolitan Organization. Comment from the DLCD state that new development should not exceed land use assumptions in the IAMP unless the IAMP is amended to reflect the new

assumptions. Department response clarified that the traffic analysis for the IAMP was based upon the regional traffic forecasting model that was used for both the Environmental Impact Statement (EIS) for the new interchange and for the 2005-2030 Regional Transportation Plan (RTP). Consistency between the IAMP, the EIS and the RTP is an important component of the planning process. Also, the traffic analysis for the SPUI, conducted both for traffic levels anticipated in the RTP and for an alternative scenario that added even more trips, indicated that OHP mobility standards would clearly be met in 2030. Even so, the IAMP still includes a management measure that recognizes the importance of continuing to implement the effective Access Management Strategy that is being built into the project. A second management measure recommends that the IAMP be adopted with City TSP policies and ordinance language that further serve to protect the facility. Any amendment to these local policies or code language would require that the OTC approve a corresponding amendment to the IAMP. It is ODOT's position that the SPUI has been designed to function consistent with OHP mobility standards and that the IAMP contains adequate additional protection for the SPUI's function. The IAMP can be found to be consistent with Policy 1B.

Policy 1C - State Highway Freight System

This policy recognizes the need for the efficient movement of freight through the state. I-5 is listed as a Designated Freight Route.

Finding: The South Medford Interchange is located on Interstate 5, which is listed in the OHP as a designated freight route. IAMP traffic operations analysis accounted for freight movement as well as passenger vehicle movement. The project to construct a new South Medford Interchange will greatly improve the movement of freight, in addition to providing needed capacity and improving both operation and safety.

Policy 1F - Highway Mobility Standards

This policy addresses the state highway performance expectations, providing guidance for managing access and traffic control systems related to interchanges. This policy sets mobility standards for ensuring a reliable and acceptable level of mobility on the highway system by identifying necessary improvements that would allow the interchange to function in a manner consistent with OHP mobility standards.

Finding: Using population and employment values from the RTP and the traffic volumes forecast by the regional traffic forecasting model, the IAMP traffic analysis showed that the new SPUI would meet ODOT mobility standards in year 2030 with an overall volume-to-capacity (v/c) ratio of 0.58. This clearly meets the OHP mobility standard for the SPUI of 0.85. A traffic analysis was also conducted for an alternative development scenario that added additional trips for employment and also assumed more dwelling units, for a total of 2,600 additional trips beyond the amount assumed in the RTP. The traffic analysis indicated that

for this alternative development scenario, the v/c ratio for the interchange as a whole would be 0.70 in year 2030, also meeting the OHP standards.

The IAMP also recommends a Highway Classification and mobility standard for a new facility. The Highland-Garfield Connector will be the new crossroad for the SPUI. The IAMP establishes a classification of Local Interest Road for this facility, with a current OHP mobility standard of 0.90.

Policy 1G - Major Improvements

This policy emphasizes the state's preference for improving system efficiency and management before adding capacity.

Finding: The new interchange replaces the existing interchange at Barnett Road. The existing on- and off-ramps at Barnett Road will be removed, leaving Barnett Road to serve as the main east-west arterial overpass in the study area. Completion of the new interchange will enable related improvements to the City's street system such as creating new limited-access local streets and improvements to Barnett Road. The construction of the new interchange will both add capacity, while operating more safely and efficiently than did the Barnett Road interchange. A new interchange crossroad, the Highland-Garfield Connector, will also be constructed.

Goal 2: System Management:

Policy 2B - Off-System Improvements

This policy helps local jurisdictions adopt land use and access management policies;

Finding: The IAMP operational analysis evaluated whether the new SPUI would meet ODOT mobility standards in 2030, using forecast population and employment values from the RTP and the traffic volumes forecast using the regional traffic forecasting model. A second traffic analysis was also conducted using an alternative development scenario, which assumed that an additional 2,600 trips would be added in the study area. The analysis showed that the new SPUI would meet ODOT mobility standards in both cases. The IAMP relies upon the fact that the Access Management Strategy—South Medford Interchange (2003), is being implemented with the construction of the new interchange. This effective strategy includes numerous treatments to both state and local facilities. The IAMP concludes the implementation of the Access Management Strategy will provide sufficient access management for the SPUI and that the City of Medford and Jackson County do not need to amend existing land use and access management policies.

Policy 2D - Public Involvement

This policy which ensures that citizens, local governments, state agencies, and organizations have input into decisions about the state highway system.

Finding: The SMI IAMP was prepared with participation from the City of Medford, ODOT, Jackson County, the DLCD, the RVMPO and with input from a variety of stakeholders and the general public. The IAMP TAC, comprised of representatives from ODOT, DLCD, the City of Medford, RVCOG, and Jackson County, met seven times. A public meeting was held in the Medford City Hall on May 25, 2005 to introduce the concept of the IAMP and to enable comment. Five informational presentations were made before City of Medford bodies. On November 11, 2004 a presentation was made before the Medford City Council; on January 25, 2006 a presentation was made before the Joint Transportation Subcommittee; on the February 26, 2007 the presentation was to a joint meeting of the City of Medford Planning Commission and Joint Transportation Subcommittee. Study sessions were held with the City Council on September 13, 2007 and with the Planning Commission on September 24, 2007. The agendas for all public meetings were placed on the City's website prior to the meetings, and all meetings were open to the public.

Policy 2F - Traffic Safety

This policy emphasizes the state's efforts to improve the safety of all uses of the highway system.

Finding: The Environmental Impact Statement (2001) prepared for the South Medford Interchange Reconstruction Project evaluated safety and crash data at the existing interchange. Safety was also a primary consideration in the design of the new SPUI.

Goal 3: Access Management

Policy 3A - Classification and Spacing Standards

This policy addresses the location, spacing and type of road and street intersections and approach roads on state highways.

Policy 3C - Interchange Access Management Areas

This sets policy for managing interchange areas by developing an IAMP that identifies and addresses current interchange deficiencies and short, medium and long term solutions. OAR 734-051 governs the permitting, management, and standards of approaches to state highways to ensure safe and efficient operation of the state highways. Section 734-051-0125, Access Management Spacing Standards for Approaches in an Interchange Area establishes interchange management area access spacing standards.

Finding: ODOT developed the Access Management Strategy for the new South Medford Interchange, in accordance with OAR 734-051. The strategy includes an inventory of the existing public and private approaches and findings for compliance with Division 51 standards. The IAMP relies upon the fact that the Access Management Strategy—South Medford Interchange Project (2003), developed during the project design phase, will be implemented during the

construction of the facility. This implementation constitutes Management Measure #1 of the IAMP. A Key feature of this strategy is full access control along the Highland-Garfield Connector, which is the SPUI's new crossroad. Another major access management component is the removal of the Barnett Road freeway ramps, which will occur when the new SPUI is operational. There will also be numerous other access treatments to both state facilities and the local street system, to enable the safe and efficient operation of the SPUI. Section 8 of the IAMP, which is in Attachment C, details the location and extent of these access treatments. With the implementation of this strategy, the IAMP is consistent with OAR 734-051.

Goal 4: Travel alternatives

Policy 4A – Efficiency of Freight Movement

This policy emphasizes the State's role in managing access to highway facilities in order to maintain functional use, safety and to preserve public investment.

Finding: The South Medford Interchange is located on Interstate 5, which is listed in the OHP as a designated freight route. IAMP traffic operations analysis accounted for freight movement as well as passenger vehicle movement. The project to construct a new South Medford Interchange will greatly improve the movement of freight, as in addition to providing needed capacity, operational features and safety will also be improved.

5. Compatibility with the Rogue Valley Metropolitan Planning Organization 2005-2030 Regional Transportation Plan (Amended 2005)

The RTP is a multi-modal transportation plan designed to meet the anticipated 25 year transportation needs within the MPO planning area boundary. The RTP serves as a guide for the management of existing transportation facilities and for the design and implementation of future transportation facilities through the year 2030. There are 12 RTP goals, each with several associated objectives. Those relevant to IAMP consistency are:

Goal 1. Plan for, develop, and maintain a balanced multi-modal transportation system that will address existing and future needs for transportation of people and goods in the region.

Goal 2. Optimize safety and security on the transportation system.

Goal 3. Use transportation investments to foster compact, livable communities. Develop a plan that builds on the character of the community, is sensitive to the environment, and enhances quality of life.

Policy 3-2. Local governments shall consider amending their Comprehensive Plans to promote mixed-use or higher density developments in urban areas that will lower the vehicular demand on the regional transportation system. These

plans will facilitate transit-oriented development (TOD) in current and future RTP designated TOD areas.

Policy 3-5. Prioritize investments to ensure existing transportation system preservation.

Goal 5. Maximize the efficient utilization of existing and future transportation infrastructure to facilitate smooth movement of people and motorized and non-motorized vehicles.

Goal 7. Provide an open, balanced, and credible process for planning and developing a transportation system that complies with state and federal regulations.

Policy 7-2. Coordinate the planning for existing and future land use and development with the planning of the transportation system.

Findings: The IAMP goals parallel the RTP goals. The IAMP goals to “maintain the function of the interchange over the 20-year planning period to preserve the investment in the facility” and “minimize the need for future major improvements to the interchange” support RTP Goal 1 (to maintain the system for existing and future needs) and Goal 5 (to maximize existing and future infrastructure). The purpose of the IAMP to protect the function of the interchange over time is consistent with Policy 3-2, which seeks to lower vehicular demand on the regional transportation system by encouraging development in Transit Oriented Districts (TODs). All of the City’s designated TODs are outside the interchange management area. Policy 3-5 reflects the IAMP goal “to preserve the investment in the facility.” The South Medford Interchange Reconstruction Project was initiated and designed to reduce congestion while improving the safety and function of the interchange, which demonstrates consistency with RTP goals 2 and 5.

The IAMP traffic analysis used the population and employment values from the RTP and the traffic volumes forecast by the regional traffic model, to demonstrate that the new SPUI would meet ODOT mobility standards in year 2030. The RTP street system project list identifies construction of the new South Medford Interchange as a Short Range project (project number 900 in Figure 8-3) to be funded by ODOT and the City of Medford. Short-range projects are expected to be needed within five years of plan adoption. The IAMP can be found to be consistent with the RTP.

6. Assurance that the Department is not Exceeding its Authority

The OTC will adopt the SMI IAMP as a facility plan element of the Oregon Highway Plan (OHP). ODOT Region 3 is implementing the Access Management Strategy (AMS) as the project is being constructed. A new interchange crossroad, the Highland-Garfield Connector, will also be constructed. ODOT will continue to coordinate with the City of Medford through the plan amendment and development review process, to keep existing land use protections in place.