

In addition to the adverse impacts identified for the Green Hill Road Flyover Alternative, it also is noted that the elevated structure required to cross the railroad tracks would result in safety hazards due to rotating super-elevation rates. In turn, this could result in erratic vehicle operation as drivers attempt to negotiate the curves, especially at night and during wet and icy pavement conditions. Potential ponding of highway runoff resulting from the nonstandard design would also present a hazard. See *Alternatives Memorandum*. For these reasons, the Green Hill Road Flyover Alternative is not an operationally feasible alternative.

Finally and as previously noted, because goal exceptions were previously approved and acknowledged for the Approved Design, it is likely that the Approved Design and Green Hill Flyover alternatives are more properly addressed under OAR 660-012-0070(5) (alternatives not requiring an exception) than under OAR 660-012-0070(7). For that reason, the discussion of those alternatives in this section are incorporated by reference into the discussion under OAR 660-012-0070(5). For the reasons explained in this section, the Approved Design and Green Hill Flyover alternatives cannot reasonably accommodate the needed transportation facility because of their significant adverse impacts to high value wetlands and T&E species.

Compliance with OAR 660-012-0070(8), ORS 197.732(1)(c)(D), Goal 2 Part II(c)(4) and OAR 660-004-0020(2)(d)

OAR 660-012-0070(8) provides that to comply with Goal 2 Part II(c)(4), the exception must describe the adverse effects that the proposed transportation improvement is likely to have on the surrounding rural lands and land uses, including increased traffic and pressure for nonfarm or highway oriented development on areas made more accessible by the transportation improvement. This section also requires, as part of the exception, facility design and land use measures which minimize accessibility of rural lands from the proposed transportation facility and support continued rural use of surrounding lands.

Similarly, OAR 660-004-0020(2)(d) requires the exception to explain how the proposed use is compatible with other adjacent uses or will be rendered compatible through measures designed to reduce adverse impacts. As used in this section, “compatible” is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses.

The compatibility of the Modified Project with surrounding rural lands is described in the *Compatibility Memorandum*, incorporated herein by reference. Those findings are summarized below. Overall, the impacts resulting from the location of this facility on rural land are minimized as a consequence of the proposed location of the facility within an area where substantial acreage is not available for development due to environmental constraints, and through the limited access design of the facility that discourages increased traffic in rural areas.

Because of its location immediately north of the railroad tracks, the Modified Project will not create any new parcels or result in any uneconomic remnants, thereby reducing farm impacts. Moreover, of the approximately 27 acres needed to be taken to accommodate the project outside the UGB, only 3.1 acres involve privately owned lands, and none of those acres are part of commercial farms. Accordingly, any impact on the commercial farm enterprise in the area is minimal.

The Modified Project will affect accesses to properties along Goble Lane. To maintain local access and use compatibility, Goble Lane would be realigned to the north and extended westward about 1,300 feet to near the western end of the project. The existing Highway 126/Goble Lane access would be closed and a new intersection created at an existing driveway at the western end of the proposed Goble Lane extension. The closure of the existing Goble Lane access and its relocation to the new intersection will help limit local access to the adjoining rural area, thereby reducing adverse farm impacts and maintaining compatibility. Likewise, the design feature closing direct access onto West

11th Avenue from Highway 126 will help minimize access to rural properties south of the Modified Project, as will the presence of the railroad tracks and railroad right-of-way south of the Modified Project where it rejoins existing Highway 126.

A concern often associated with limited access highways is the potential for urbanizing effects outside and at the fringe of the urban area. While this potential exists for the WEP and its Modified Project alignment, any pressures for nonfarm or highway oriented development that this facility might otherwise have should be substantially constrained by the federal and state ownerships and management of many of the largest parcels nearest the proposed corridor, as well as by zoning limitations imposed to comply with state land use requirements.

As shown in Figure 2, a large percentage of the property abutting the proposed Modified Project corridor north and south of the railroad outside the urban growth boundary is under public ownership for the purposes of restoring habitat consistent with the *WEWP*.⁷⁹ Other properties inside the UGB between the Amazon Channel/railroad separated grade structure and Green Hill Road south of the railroad are in similar public ownership or substantially development-constrained because of the presence of wetlands. Consequently, these properties effectively are not subject to urbanizing pressures. There is some rural land near Green Hill Road that is designated urban reserve land for the metropolitan area. Improved access to this area could accelerate the timeline for developing those urban reserve lands.

Nearer the terminus of the Modified Project, a larger percentage of lands are privately owned. In this area, protection from urbanizing pressures comes through development limitations resulting from the presence of wetlands, exclusive farm use or forest zoning designations, and through the very large barrier to development created by the Fern Ridge Reservoir State Wildlife Management Area. The presence of wetlands in this area substantially reduces development pressures because of the difficulties in obtaining authorization to develop wetlands and because of the significant costs involved in wetland mitigation. Also, the presence of railroad tracks south of Highway 126 creates a barrier that helps minimize accessibility to rural lands in this area. However, improved access to this area could accelerate pressures for rural residential development in areas near the project terminus designated for rural residential development with five or ten acre minimum lot sizes. Any such development would remain rural and would not be incompatible or inconsistent with acknowledged plans.

Any potential WEP contributions to the development rate at Veneta, located about 5½ miles from the western WEP terminus, should be substantially offset by infrastructure constraints, including an inadequate wastewater treatment facility and problems with the municipal water supply. See *Land Use Technical Report* at 50.

Overall, the significant wetlands resource, the large amount of acreage in public ownership, and the EFU zoning should provide adequate protection for rural and resource lands and minimize their accessibility. The presence of the railroad, the locations of wetlands and public land ownerships, particularly at Green Hill Road and in close vicinity to the Modified Project alignment terminus, will minimize pressures for highway oriented development in the area.

Additionally, the limited access design of the WEP with the Modified Project should reduce pressures for nonfarm or highway oriented uses on the surrounding rural lands. As designed, the WEP does not encourage usage by local traffic. Instead, it will serve statewide and regional “through” traffic. For

⁷⁹ Restoration projects include the 1135 project, identified at page 43 of the *Land Use Technical Report*, which provides for removal of dikes by the US Army Corps of Engineers in the area just north of (but not including) the Modified Project between Terry Street and Green Hill Road to restore approximately 140 acres of wetlands and enhance another 45 acres of native habitat, and the Cone mitigation site, a wetland mitigation project located northwest of Terry Street and the Modified Project. The 1135 project excludes the Modified Project alignment because of the potential that the WEP may be located there.

this reason, any increases in traffic volumes outside the UGB resulting from the WEP are expected to be minimal and insignificant. The absence of interchanges or intersections outside the UGB between Green Hill Road and the project terminus further minimizes pressures to convert rural lands to nonresource uses.

Because of the existing environmental and zoning constraints reducing pressures to development on rural lands, because the WEP is designed to support statewide and regional rather than local travel needs, and because accesses to rural lands are not provided for along the facility between Green Hill Road and the Project terminus, the Modified Project is compatible with adjacent rural uses in the area and further measures to reduce adverse impacts should not be necessary.

Alternatives Considered – WEP

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Purpose of Memo

The development of the West Eugene Parkway Project from West 11th Avenue easterly to Garfield along Highway 126 has spanned over three decades. Numerous alternatives have been considered and many have been rejected for a variety of reasons - engineering infeasibility, inconsistency with local plan, adverse impacts to natural resources, and unreasonable socio-economic impacts - to arrive at a build alternative that best satisfies the purpose and need for the project.

The Modified Project (Northern Alternative) is the recommended WEP alternative. The alignment includes a section that would extend part of the facility a short distance onto agricultural land west of the Eugene-Springfield Metro area Urban Growth Boundary (UGB). The Transportation Planning Rule (TPR) governs transportation facilities and improvements located outside the UGB specifying which facilities are appropriate in rural locations. Any facilities which are not specified in the TPR require goal exceptions to locate on rural lands. The exception statement required by the TPR must address the identified transportation need and explain why that need cannot reasonably be accommodated through alternative modes, or by locations not requiring an exception. The TPR also requires the identification and justification of the factors used to determine why alternatives not requiring goal exceptions cannot reasonably accommodate the need. Under the TPR the recommended WEP alternative would require exceptions to Goals 3, 4, 11 and 14.

This memo is not an exception statement, the purpose is to provide a record of background information and facts regarding the alternatives considered for the West Eugene Parkway (WEP). Specifically, why those alternatives cannot accommodate the project need. The basis of this paper is the Draft SEIS with additional research and information added as necessary. This document considers the following topics:

Background

- Purpose and Need – description of basic premise of the project
- Project History – discussion includes general evolution of the project to date and planning context
- Decision Criteria – constraints, goals, and objectives

Project Context

- System Assumptions -- fundamental assumptions related to the transportation system

- Base Case and Existing Conditions – description of physical east – west facilities in West Eugene

Alternatives Considered

- Evaluation Factors
- Comparison of Alternatives

List of Appendices

- A. Purpose and Need
- B. Transportation Operations
- C. Summary of Alternatives Dismissed
- D. Evaluation Framework
- E. Related Projects
- F. Reference List

Background

Purpose and Need

The purpose and need for the WEP has not changed from the Supplemental Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, chapter 1, page 1 (see Appendix A). The West Eugene Parkway Supplemental Needs Analysis of September 1994 demonstrates a continuing need for the project. The transportation issues are improvement of mobility and access, relief from congestion, and safety improvement.

Without the West Eugene Parkway, numerous intersections in the vicinity of West 11th Avenue would operate with levels of service greater than F and volume to capacity ratio in excess of 1.0 for peak hour traffic (see “No Build” level of service in Appendix B). In addition, the intersections of 6th and 7th Avenue (Hwy 99W, MP 121.7 to 122.4) with Garfield Avenue have an accident rate of 9.41 vehicle crashes per 1 million miles traveled compared to a statewide average of 3.83 vehicle crashes per 1 million miles traveled for urban arterials for the period from 1996 through 1998.

Project History

As Eugene’s population grew from about 36,000 in 1950 to an estimated 125,000 people today, development continued to expand to the west in accordance with plans. During this period, the City of Eugene steadily annexed lands to the west. The current urban growth boundary (UGB) extends west to Green Hill Road. The West Eugene area is one of the city’s areas of existing and future industrial land supply.

A 1960 Highway Study for the years 1980-85 [the *Eugene-Springfield Area Transportation Study Interim Report (E-SATS)*] identified a need for a limited access facility serving West Eugene. The Roosevelt Freeway was conceived to link I-5 with Highway 126. It was planned to be a loop expressway to avoid the central business district and run parallel to and north of the railroad through the Bethel-Danebo region. The connection with Highway 126 was to be the completion of the Roosevelt Freeway to carry traffic from I-5, River Road, and Highway 99 through congested areas westward.

In 1961, Eugene voters adopted a City Charter provision that required a vote of the electors before freeway planning could be undertaken by the City. The 1961 Charter provision was repealed by the Eugene voters in 1964.

Early plans extended I-105 across the Willamette River to connect with the Roosevelt alignment through West Eugene, but construction of the Valley River Center in the late 1960s blocked that route. By the early 1970s, planning for the Roosevelt Freeway was completed and some right-of-way was purchased by the state.

Community opposition to negative impacts on the Willamette River Greenway and the Whiteaker and Roosevelt neighborhoods resulted in changes to the Roosevelt Freeway proposal in the late 1960s and early 1970s. In 1972, Eugene voters amended the City Charter to require a city-wide vote on any future limited access arterial proposed within the city.

Meanwhile, due to changing community attitudes, the adoption of the T-2000 Plan in 1978 replaced the Roosevelt Freeway with a new corridor in the alignment of 6th and 7th Avenues extending westward. Subsequent development precludes this corridor from further consideration for a limited access controlled transportation facility.

Several alternatives were considered over the next 8 years. In 1984, a Citizens Advisory Committee (CAC) recommended two alternatives for study in the DEIS. The DEIS, released for public review in October 1985, evaluated the two alternatives and a No-Build alternative. A Supplemental DEIS was issued in June 1986 and examined five alternatives between Seneca Road and Highway 99. A FEIS was released in early 1990. The FEIS identified the Approved Design as the selected alternative. Avoiding segmentation of industrial lands was one of the reasons for the selection of the preferred alternative. The approved design in the FEIS included 4.5 acres of agricultural land outside the urban growth boundary that required and received an exception to Goals 3 and 5 in 1986.

Because the understanding of existing conditions had changed substantially since issuance of the FEIS, the Modified Project was developed to address concerns related to these changed conditions, and to provide an update of the WEP's potential impacts to these and other resources. After discovery and inventory of a concentration of wetlands in western Eugene in 1987, the City of Eugene undertook a formal planning work program in January 1989 to develop the *West Eugene Wetland Plan (WEWP)*. Lane Council Of Governments (LCOG) managed the development of the *WEWP* in a process separate and concurrent to the development of the WEP.

West Eugene Wetland Plan -- The *WEWP* development process took place from 1989 to 1992. Lane County, LCOG, City of Eugene, Youth Conservation Corps, and Nature Conservancy coordinate the development and implementation of the plan through a signed coordination agreement. The approach for the development of the *WEWP* included a comprehensive work program including technical analyses, agency coordination, and public involvement to consider a range of alternatives. Of the eight alternatives evaluated, the selected alternative consists of a balanced development and wetland protection program.

The purpose of the *WEWP* is multi-faceted and includes the following factors:

- Protection and restoration of wetland and waterway system
- Protection of natural diversity (referring to plants)
- Development opportunities and certainty (remove cloud for property owners)
- Define wetland protection measures
- Mitigation and banking
- Stormwater management

- Water quality improvements
- Improved flood control
- Improved plant and animal habitats
- Recreation, education, and research
- Corridors and connections
- System management
- Financing protection, restoration, and management

A major reason for undertaking the West Eugene Wetlands Study was to solve the issue of how the City might recoup some of the remaining capacity for over \$12,000,000 worth of existing infrastructure already extended into the west Eugene region. There are other examples where projects are currently moving forward under the premise of planned growth, with the WEP as an integral component of local plans.

The WEP was incorporated into the WEWP from the beginning. The plan diagram referred to as Map No. 3 in the WEWP, shows the Approved FEIS Alignment as "Wetlands to be Developed". Appendix B (p. 73) of the WEWP contains the list of protection and development criteria. The "Revised Alternatives Analysis, Chapter VII, West Eugene Wetlands Special Area Study Technical Report", 1993 includes justification for development sites in Chapter J. The decision-making criteria included #2, p. 126: "need for a public project (i.e., the West Eugene Parkway)".

In 1992, the WEWP was adopted as an element of the local comprehensive plans of Lane County and City of Eugene. In September of 1994, DSL approved the WEWP with conditions and the Army Corps of Engineers did likewise in November of 1994, with EPA approval following before the end of the year. In the approval order and final decision document, the WEP portion of the WEWP was not approved because ODOT and key federal agencies had agreed to examine other alternatives to the FEIS alignment in part to respond to new information about rare species and wetland impacts (DSL condition #6, p.11). The Corps decision document adopted the DSL conditions.

In the WEWP planning area, there are 1,307 acres of wetlands of which 600 have been designated as industrial use in the comprehensive plan. Implementation of the WEWP will result in protection of 1,019 acres of wetlands of which 485 acres are designated as industrial use. This leaves 115 acres of the original 600 acres of lands designated for industrial use as developable. There are 2,271 acres of designated industrial use elsewhere within the City of Eugene UGB.

The decision structure for the plan consists of policy, implementation and management, and monitoring level responsibilities. WEWP is an element of the local comprehensive plan. The Wetland Executive Team (WET) manages plan implementation and ongoing coordination chaired by City of Eugene Public Works Director. City Public Works is responsible for a comprehensive monitoring and maintenance program (CMMP) as defined in the WEWP. Subsequent agreements have been made where BLM has responsibility for monitoring rural lands and Public Works urban lands.

Over \$7 million of federal funding has been invested in the implementation of the WEWP to date. In addition to the federal funding, there is considerable investment from private property owners located in the area west of Beltline, north of West 11th, and south of the railroad tracks. Private investment was made in good faith that the plan would preserve properties for development as shown in the plan. ODOT and BLM coordinated property

acquisition activities where parcels along the Approved FEIS Alignment were deeded to ODOT for the purposes of transportation. ODOT and BLM discontinued this arrangement when the NEPA process was reopened to give consideration of the Modified Project alignment north of the railroad tracks.

The *WEWP* has received national acclaim as a prototype for wetland banking and an exemplary case demonstrating how environmental protection and industrial development can co-exist in a coordinated implementation and management plan. Property has been acquired, projects have been developed, and built with the *WEWP* and *WEP* in mind. Specifically, the 11-35 Project developed cooperatively by the US Army Corps of Engineers and City of Eugene was designed to accommodate the alignment of the Modified Project by not including the properties to north of the railroad tracks or the Modified Project. See Appendix E for a more complete listing of related projects.

According to City of Eugene's Planning Director, a plan amendment would be required for the Modified (Northern) Alignment. Lane County and City of Eugene locally elected officials make policy level decisions including plan amendments. The City has been waiting for the ROD and closure of the NEPA process to begin the amendment process to shift the alignment from the Approved FEIS Alternative to the Modified Project.

By 1995, recommended changes to the Approved Design were developed to improve traffic operations and to reduce impacts to the western pond turtle, wetlands, and rare plants. A supplement Draft SEIS was prepared in 1997 and Public Hearing held to report new data, compare impacts of the two alternatives and to update the environmental analysis. The Supplemental Draft Environmental Impact Statement disclosed potential environmental impacts for two alternatives:

The Approved Design (Approved FEIS Alternative), was selected in the 1990 Final Environmental Impact Statement. It involves constructing the *WEP* on a new alignment, creating an 8.9-kilometer (5.5-mile) extension of the 6th and 7th Avenue Couplet. The western limit of the Approved Design is west of the City of Eugene, west of the intersection of Highway 126 and Goble Lane near Oak Hill. The roadway would travel on a new alignment generally eastward to a terminus at Highway 99 and Garfield Street. As explained in the FEIS, the Approved Design combines the best features of Alternative 1, Modified At Grade, and Alternative 1B, as described in the DEIS.

The Modified Project (Northern Alternative), encompasses design options that reduce biological impacts and improve traffic operations. These include moving the West Eugene Parkway to the north side of the railroad tracks between the west end of the project and Terry Street, and construction of a new flyover at the West Eugene Parkway's intersection with Highway 99, to eliminate congestion associated with at-grade left turns across Highway 99. To accommodate projected traffic volumes, several modifications would be made to the intersections of 6th and 7th avenues with Garfield Street. Sixth Avenue would widen from four lanes at Grant Street (two blocks east of Garfield Street) to six lanes at Garfield. That widening is likely to occur within the existing right-of-way. Approaching Garfield, 6th would have two left-turn lanes, three through lanes, and one combination through/right turn lane. As Garfield approaches 6th from the north, it would be widened to four lanes. Garfield would be widened to five lanes between 6th and 7th, with two through lanes in each direction and a center left turn lane at 6th and 7th.

To reduce wetland and rare plant impacts, an alignment shift is recommended that would locate the *WEP* along the north side of the Central Oregon and Pacific Railroad alignment

west of Terry Street, rather than along the south side as proposed in the Approved Design. This would be accomplished with a grade-separated crossing over the tracks and the Amazon Channel near Terry Street, and would also require that the project be lengthened about 400 meters (1,300 feet) on the west end at its connection with Highway 126. In order to meet an acceptable level of service at the WEP connection with Highway 99, a northbound to westbound separated grade was added.

When the results of the Public Hearing open comment period favored the Modified Project, a review of non-exception alternatives was undertaken because a new goals exception would be required. All but the 'Southern Alternative Corridor (Options 1 and 2)' failed to meet satisfactory transportation operational requirements (see Appendix C for descriptions of alternatives). The Southern Alternative was evaluated at a corridor level for prudence and feasibility.

The Southern Alternatives were evaluated for feasibility at a corridor level. For the Southern Alternatives east of Danebo, the alignment is the same as the Modified Project. From Danebo Avenue to the west there are significant differences between the Modified and Southern Alternatives. In general, the alignment shifts to the south through the industrial lands reconnecting with West 11th prior to the intersection of Green Hill Road. The alignment would bisect the Green Hill Technology Park and other parcels designated in the WEWP as developable lands. West 11th would be rerouted. Westbound along West 11th would continue straight to the intersection of Crow Road and Green Hill Road rather than curving to the right. Upon review of site conditions, modifications to the alignment were made to reduce impacts to natural resources.

Southern Alternative, attempts to avoid goal exception lands, minimize wetland impacts, and impacts to federally listed T&E species. However, the alignment is within close proximity to a patch of lupine, so would pose a greater risk to fender's blue butterfly (which will also soon be federally listed). The modified alignment was created as a refinement and to optimize costs and impacts.

Southern Modified Alternative provides greater buffer distance from Kincaid's Lupine, host plant to the Fender's blue butterfly (federally proposed endangered) than the Southern Alternative. Overall impacts and implementation costs were reduced from the Southern Alternative. The Southern Modified is further north and has more impacts to wetlands and T&E, including direct impacts to the Willamette Valley daisy (which will soon be federally listed) which make it unacceptable based on the federal Endangered Species Act.

Both of the Southern Alternatives were determined to be unreasonable on the basis of combined impacts to the natural and social environments and cost as will be shown in greater detail in following sections of this document. The impacts to industrial properties of the Southern Alternative are similar to Alternative 2 and 2A considered and dismissed by the CAC during the mid-1980s in the development and selection of the Approved FEIS Alternative.

Decision Criteria

During the development of alternatives for the October 3, 1985 DEIS, there was a Technical Advisory Committee (TAC) and a Citizens Advisory Committee (CAC) in place. The TAC and CAC identified constraints, goals, and objectives. The goals and objectives have been used in the decision process for evaluating and screening alternatives. At a February 14, 1983 meeting, the project TAC identified the following constraints:

- Avoiding Bertelsen Slough
- Avoiding West Lawn Memorial Park
- Keeping intact large parcels of land with commercial/industrial development potential
- Avoiding existing substantial commercial/industrial development

Project goals and objectives were formalized by the CAC at their April 12, 1983 meeting. The goals were:

- Move traffic east to west
- Relieve traffic on West 11th Avenue
- Facilitate future development (in the UGB)
- Provide access to the extent this is possible and practical

The objectives were:

- To disturb existing businesses as little as possible
- To closely follow property lines and thus not divide large parcels
- To respect the Bertelsen natural areas
- To miss the existing cemetery on Danebo

This decision criterion was developed through public and agency participation and applied consistently as development of the WEP evolved over time. Appendix D shows the evaluation framework used for evaluating alternatives.

Project Context

The purpose of this section is to describe the system assumptions and the base case and existing conditions. The system assumptions addresses general planning data, mode split trends, transportation demand management (TDM), and Public Transit including land use and transportation system management (TSM).

System Assumptions

The local transportation-planning document (*TransPlan*) has been in an update process for some time. The *Draft Revised TransPlan* is currently in the process of public review prior to being adopted. Preliminary indications are that there will be revisions to the plan before it is finally adopted. For the WEP, the NEPA process is predicated on adopted local plans and not draft or proposed plans. However, there has been significant technical analysis and public participation in elements of the plan update process in order to bring the current plan into compliance with TPR. LCOG operates the land use/transportation model that was used for travel demand forecasting and traffic operations analysis for the WEP and has also provided technical assistance to the update process of *TransPlan*. While the current plan must be used in the NEPA process, there are a number of results from prior studies that provide additional support and justification of the WEP. The focus of this section is to extract general data, TDM, and public transportation findings that are necessary in addressing the purpose and need of the WEP and TPR.

For planning purposes, the region is considered to be the Eugene Springfield area within the Urban Growth Boundary (UGB). *TransPlan* shows the region is expecting a population growth of 34% from 224,100 in 1995 to 301,400 in 2015 and employment growth of 43% from 106,900 in 1995 to 153,000 in 2015. A forecast of trends during the planning period show that travel behavior would lead to an increase in per capita vehicle miles traveled (VMT) and congestion without a balanced

approach to land use/transportation supply and demand solutions. *TransPlan* strategies applied in West Eugene include TDM Programs and Public Transportation. The Draft Revised *TransPlan* expands TDM programs, includes Bus Rapid Transit (BRT) and nodal development, and in addition, roadway projects that benefit pedestrians, bicyclists, and motorists.

As part of the update to *TransPlan* process, LCOG developed strategies for improving the transportation system were divided into three categories: Transportation Demand Management (TDM), Transportation System Improvements (TSI), and Land Use Measures (LUM). Citizen task forces were formed to study and evaluate strategies in each of these categories based generally on appropriateness and feasibility in Eugene/Springfield. On the basis of these evaluations, groups of TDM strategies combine LUM and TSI strategies to form plan scenarios and eventually a transportation plan. The *Draft Revised TransPlan* proposes to implement a balance or equal emphasis of TDM strategies, Land Use Measures, and System Improvements. Table 1 reports the associated modal splits.

TABLE 1 MODE SPLIT COMPARISON

Performance Measures	1995 Existing Conditions	2015 Trends	2015 unconstrained scenario (1)	2015 financially constrained scenario (1)
Walk	8.6%	7.8%	9.3%	9.4%
Bike	3.6%	3.2%	3.4%	3.5%
Transit	1.8%	1.8%	2.7%	2.7%
2 or more person Carpool	42.3%	42.9%	43.0%	42.9%
SOV	43.7%	44.3%	41.6%	41.6%
Person trips per auto trip	1.59	1.61	1.7	1.7

(1) Note: Future scenarios factor in the 10 percent vehicle trip rate reduction allowed in the TPR amendments for mixed-use pedestrian friendly areas. This reduction has been applied to nodal development areas identified in the Draft TransPlan

Transportation Demand Management (TDM)

In a period from 1994 through 1996, LCOG conducted a study and analysis of the potential for TDM in the Eugene-Springfield Area. There were a number of reports and studies published related to this effort. This section attempts to report the findings in an incremental presentation format concluding with the maximum benefit in VMT reduction associated with publicly acceptable TDM strategies.

TDM is relatively inexpensive and can be implemented in the short term to help postpone the need for more extensive investments. LCOG facilitated a task force to prioritize preferences of TDM strategies and identify opportunities for application of these preferences for additional evaluation. TDM Task Force evaluated and prioritized strategies into three groupings; high preference, medium preference, and low preference. The Task Force Final Report records the following listing priorities based on appropriateness

- High preference list – Family car incentive, marketing/public education, Bike/Ped Policy, rideshare matching (voluntary program), transportation allowance, group transit pass (voluntary program), parking management, employee transportation coordinator, special event TDM programs/plans, transit use subsidy (voluntary program), special user fees, and insurance pricing at the pump.
- Medium preference list – networking groups, park and ride lots, trip reduction ordinances, and shuttle services.
- Low preference list – voluntary no-drive days, high occupancy vehicle lanes, special taxes, and congestion pricing.

Home based work trips account for a relatively small percentage of total trips. However, the work commute trip heavily influences the choice of departure time, mode and destination for other trips.

Work related trips are approximately 25% of all trips and represents a significant concentration of trips during a narrow window of facility demand or peak period. This opportunity for trip reduction was examined in greater detail by the task force.

Two types of employer based TDM strategies were modeled by LCOG on five sub-areas in the Eugene-Springfield region. The strategies were grouped by employer support strategies and employer incentive strategies. Each strategy or package of strategies was modeled twice, once as a voluntary strategy and once as a mandatory strategy. Voluntary and mandatory refer to the implementation conditions. The selection of either voluntary or mandatory determines the participation rates of employers in the TDM strategy or program. Rates were based on actual program results documented elsewhere from around the country.

Employer support strategies were packaged into two complete programs. The two programs considered for study were:

- Modest Employer Support Package – Rideshare (carpool and transit) information activities tied in with area-wide matching, and a ¼ time transportation coordinator. Rates range from a low of 0.1% for voluntary to a high of 0.4% trip reduction in work trip VMT by sub-area.
- Strong Employer Support Package – In-house rideshare matching and information services, preferential parking for ride sharers, flexible schedules, a guaranteed ride home program, and a full-time transportation coordinator. Rates range from a low of 2.4% for voluntary to a high of 10.5% trip reduction in work trip VMT by sub-area.

Employer incentive strategies involve changes in the cost per day (in parking or fare) to single-occupant vehicles (SOVs), carpools, vanpools, and transit users. For example, a reduction in transit fare of \$0.75 and an increase in parking of \$1.00 would have double affect on SOV.

- Transit Fare Reduction – Rates range from a low of 0% for voluntary to a high of 0.4% trip reduction in work trip VMT by sub-area.
- Parking Pricing Increase – Rates range from a low of 0.2% for voluntary to a high of 6.0% for trip reduction in work trip VMT by sub-area.

While work related trips are one segment of VMT, there are additional strategies that were evaluated for broader application and corresponding benefit to VMT reduction. Several TDM strategies were considered and evaluated by the task force to go beyond work related VMT reduction. The findings of the TDM Task Force resulted in the following:

- Mandatory Employer Support Programs – 2.5% reduction in total VMT, assuming strong employer package as defined above.
- Trip-reduction Ordinances – not supported by the Task Force
- Transit Strategies – 1% reduction in total VMT, assumes a \$0.75 trip fare reduction.
- Parking Price Increases – 2.5% reduction in total VMT, assumes SOV increase in the downtown area of \$2.00 and carpool fee were increased by \$0.40.
- HOV Lanes – 1% reduction in total VMT, assumes some shift from transit to carpool.
- Fuel Price Increases – 0.3% reduction in total VMT, assumes an increase of \$0.06 per gallon that was being contemplated by the legislature.
- Telecommuting – voluntary 0.5% and mandatory 2.1%, assumes strategy would only affect work related trips.

The conclusions from TDM Task Force and LCOG study efforts show that a reduction of approximately of just under 10% reduction in total VMT can be justified with a relatively high level of acceptance.

The model runs used in 1996 to conduct the transportation operational analysis shown in Appendix B include TDM Programs. Revisions to the model associated with proposed expansion of TDM Programs from 1996 levels are not considered to be detectable within the precision and accuracy of the model according to Bud Reiffs, LCOG's principle modeler. It is clear that TDM provides a benefit to the overall transportation system and improve overall operations. The marginal improvement is not significant enough to negate the need for the WEP.

Public Transit

In August of 1997, LCOG conducted an analysis on the potential for Public Transportation in Eugene-Springfield Area. This study consisted of a market analysis, system analysis, and findings and conclusions. The following paragraphs address the public transit findings and direction being established for future system development.

Due to growth in the area and increasing demand for faster, more convenient transit service, Lane Transit District (LTD) has proposed development of Bus a Rapid Transit system (BRT). The BRT system is based on light-rail transit principles, but instead of the required capital investment in trains and track, it utilizes buses in service that is integrated with key components of the existing automobile transportation infrastructure, such as roads and rights-of-way, intersections, and traffic signals.

The BRT system would be used as a complementary element to regular Public Transit service. The West 11th/West 18th Avenues (Eugene) – Main Street (Springfield), as identified in Draft Revised *TransPlan*. Service frequencies would be similar to regular services with 10-minute headways, weekday daytime and 20-minute headways, evenings and weekends. Regular service would default to 20-minute headways off-peak. BRT would employ several features to decrease travel times including; exclusive bus lanes, transit priority treatments (e.g. preferential traffic signal timing and queue-jumpers), extended stop spacing, enhanced shelters and boarding areas, and barrier free fare system.

Findings from the analysis conclude that BRT and mixed-use nodal development patterns are complementary strategies. The actual analysis was conducted in coordination with TDM strategies, land use measures, and transportation system improvements. The analysis strategies included existing conditions, base case, TDM emphasis, land use emphasis, system changes emphasis, and equal emphasis. The range of percent transit modal share excluding external trips ranged from a low of 2.10% for 1995 conditions, 2.23% for 2015 base case, up to the highest with 4.03% with 2015 equal emphasis. The cost to implement BRT ranges from a low end of \$27 million to a high end of \$102 million depending upon the degree to which a pure BRT system can be implemented. There will be tradeoffs made between BRT and a comparable fixed route system. The *Draft Revised TransPlan* proposes to implement a variation of the equal emphasis scenario.

It is clear from the numbers generated from these studies that increases in investment in Public Transportation and changes in land use will have an affect on improving transportation operations. The marginal improvement is not significant enough to negate the need for the WEP.

System Improvements – The proposed system improvements are likely to be revised prior to approval of *TransPlan*. The *Draft Revised TransPlan* proposes the following improvements to east-west facilities in the West Eugene Vicinity:

- Improve Royal Avenue from Green Hill Road to Terry Street to urban standards.
- Improve Roosevelt Blvd. from Danebo to Beltline to urban standards as part of the Beltline Project from Royal Avenue to Central Oregon and Pacific Railroad.

- Plans include nodal development areas including commercial, employment, or neighborhood centers as well as future capacity improvements from the UGB to Danebo along West 11th Avenue. This route has been identified as a “pilot test case” as a bus rapid transit corridor.
- West 18th Avenue has been identified as a study route due to the apparent conflict between function and adjacent uses. Traffic volumes are higher than desirable for the adjacent land uses.
- Implement Unit 1A of the West Eugene Parkway.

Base Case and Existing Conditions

The purpose of this section is to highlight existing characteristics of the east-west arterial system in West Eugene. The following discussion includes a description of general setting, physical facilities, and statement of the out of direction travel required for east-west through trips as an alternative to the WEP.

Royal Avenue – Royal Avenue is north of West 11th Avenue approximately 1.4 miles and functions as an east-west minor arterial through residential properties primarily. In addition, the route is adjacent to Peterson Park and Fairfield Elementary School. From west of the UGB to Terry Street, the typical section consists of a two-lane facility with a painted fog line with a posted speed of 45 mph with a four-way stop control at Green Hill Road. From Terry Street to Bertelsen, Royal Avenue is a three-lane section with bike lanes and no parking with a posted speed of 35 mph. From Bertelsen to Highway 99, Royal narrows to two lanes with bike lanes and no parking. Accesses are typical of residential streets. Without the WEP, using Royal Avenue require an average out of direction of approximately 2 miles per trip.

Roosevelt Blvd – Roosevelt Blvd. is north of West 11th Avenue approximately 1.1 miles and functions as a minor arterial from Terry Street to Highway 99. Roosevelt Blvd. has not been fully constructed along this route. Roosevelt currently starts at the west end as a ‘Round About’ intersection with Terry Street and continues to Danebo as a two lane street with a large drainage (A3 Channel), industrial lands, and prefabricated housing to the south. Affordable ‘stick built’ residential is located to the north along this section. There is no street from Danebo to Beltline at this time. From Beltline to Bertelsen, Roosevelt Blvd. is a 3 lane section with bike lanes, heavy industrial to the south and a mixture of mobile homes and manufactured housing to the north. From Bertelsen to Seneca, Roosevelt Blvd. continues as a three lane section with a concrete barrier, ditch, and residential to the north and industrial to the south. From Seneca to Highway 99, Roosevelt Blvd. is a 5-lane section with bike lanes and industrial properties north and south.

Without the WEP, using Roosevelt Avenue would require an average out of direction travel of approximately 2.0 miles. For through travel, Royal Avenue would need to be used to the north. Terry Street is a limited connector for truck traffic and a percentage of other vehicles due to the traffic calming features that are currently under construction or recently completed along Terry Street.

West 11th Avenue – West 11th Avenue currently serves as the extension of Highway 126 into Eugene as far as Garfield Street from the west, where West 11th becomes one-way westbound. West 11th is classified as a principal arterial. West 11th Avenue is a 2-lane facility to Danebo with left turn lanes at Green Hill and Terry Street. From Danebo to the east, West 11th is a 5 lane section without parking and bike lanes. West 11th Avenue has no access control with an average spacing of one driveway per 75 feet from Beltline Road to Garfield Street and with a posted speed of 45 mph. Without the WEP, out of direction travel would be less than Roosevelt, Royal, and West 18th Avenues. However, travel times would be delayed due to congestion.

West 18th Avenue – West 18th is located approximately 0.6 miles south of West 11th Avenue and is classified as a minor arterial. West 18th connects to Willow Creek Road to the west extending past Garfield to the east to Agate Street. The section from Willow Creek Road to Bertelsen is currently being reconstructed to urban standards. From Bertelsen to Bailey Hill, West 18th is a two lane facility with bike lanes and parking on both sides through a residential section posted at 40 mph. From Bailey Hill to Garfield, West 18th is a three lane section with bike lanes, no parking through a mixture of residential, financial, churches, and five schools with a posted speed of 30 mph. The vertical and horizontal alignments may be designed for running speeds less than the posted speed.

Without the WEP, using West 18th as an alternative route would require an average out of direction travel distance of approximately 1.2 miles. In addition travel speeds would be reduced and there are a significant number of schools and associated crossings where pedestrian/vehicle conflicts exist translating to potential safety problems.

West Eugene Parkway – WEP is proposed to function as a limited access controlled facility. As such, the facility would serve primarily through trips while other parallel facilities would primarily serve local trips and facilitate access to lands in the West Eugene vicinity. Table 2 reports the percent of through trips not originating in or destined for the West Eugene corridor defined as Royal Avenue to the north, West 18th to the south, Green Hill Road to the west, and River Road to the east. The function of the WEP will be to primarily carry through trips. The purpose of other nearby facilities will be to carry local travel trips. The total through trips entering/exiting the WEP west of Greenhill amounts to over 42% of total trips exiting/entering the WEP at Highway 99. This indicates that there is a significant demand for this facility for purposes other than access to properties in West Eugene.

TABLE 2: PERCENT THROUGH TRIPS

West to East Section	Roosevelt Avenue	WEP	West 11 th Avenue
Western termini to Green Hill		78%	74%
Green Hill to Danebo	34%	85-75%	4-17%
Danebo to Bertelsen	0-24%	72-75%	13-19%
Bertelsen to Bailey Hill	19-24%	54-58%	13-19%
Bailey Hill to Seneca	19-24%	54-58%	18-23%
Seneca to Garfield		49-58%	23%

Alternatives Considered

The purpose of this section is to address alternatives considered for the purposes of state land use planning goals. Numerous other alternatives have been considered over the years and are documented elsewhere in the project record. This section includes a discussion of the evaluation

factors leading to the Modified Project (Northern Alternative) being recommended as the preferred alternative with justification presented as to why other alternatives are deemed unreasonable.

Evaluation Factors

In the development of the WEP, there were an extensive number of alternatives and options considered and evaluated. The TPR requires a determination of reasonableness be identified and justified for affecting exception lands outside of the UGB. The factors identified in the TPR include operational feasibility, cost and economic dislocation. Many corridors, alternatives, and options were considered and rejected outright on a qualitative or comparative basis due to unfeasibility from an engineering standpoint and/or negative impacts to the natural environment. A summary of these alternatives is shown in Appendix C with a written description of design and operational features that make them unreasonable.

Transportation operational feasibility factors include application of Oregon's transportation plans, policies, and standards (design, level of service, safety, etc.). These factors include safe engineering design, capacity to reasonably accommodate future travel demand, and constructability. The WEP would be designed and constructed to comply with ODOT standards for an urban, statewide, limited access facility according to; *Oregon Highway Plan* (ODOT 1999), *Metric Highway Design Manual* (ODOT 1993), *A Policy on Geometric Design of Highways and Streets* (AASHTO 1994), *Roadside Design Guide* (AASHTO 1996), *Standard Specifications for Highway Construction* (ODOT 1996), and *Supplemental Standard Specifications for Highway Construction* (ODOT 1996). A public hearing process occurred prior to the adoption of the *Oregon Highway Plan* and the classification of facilities.

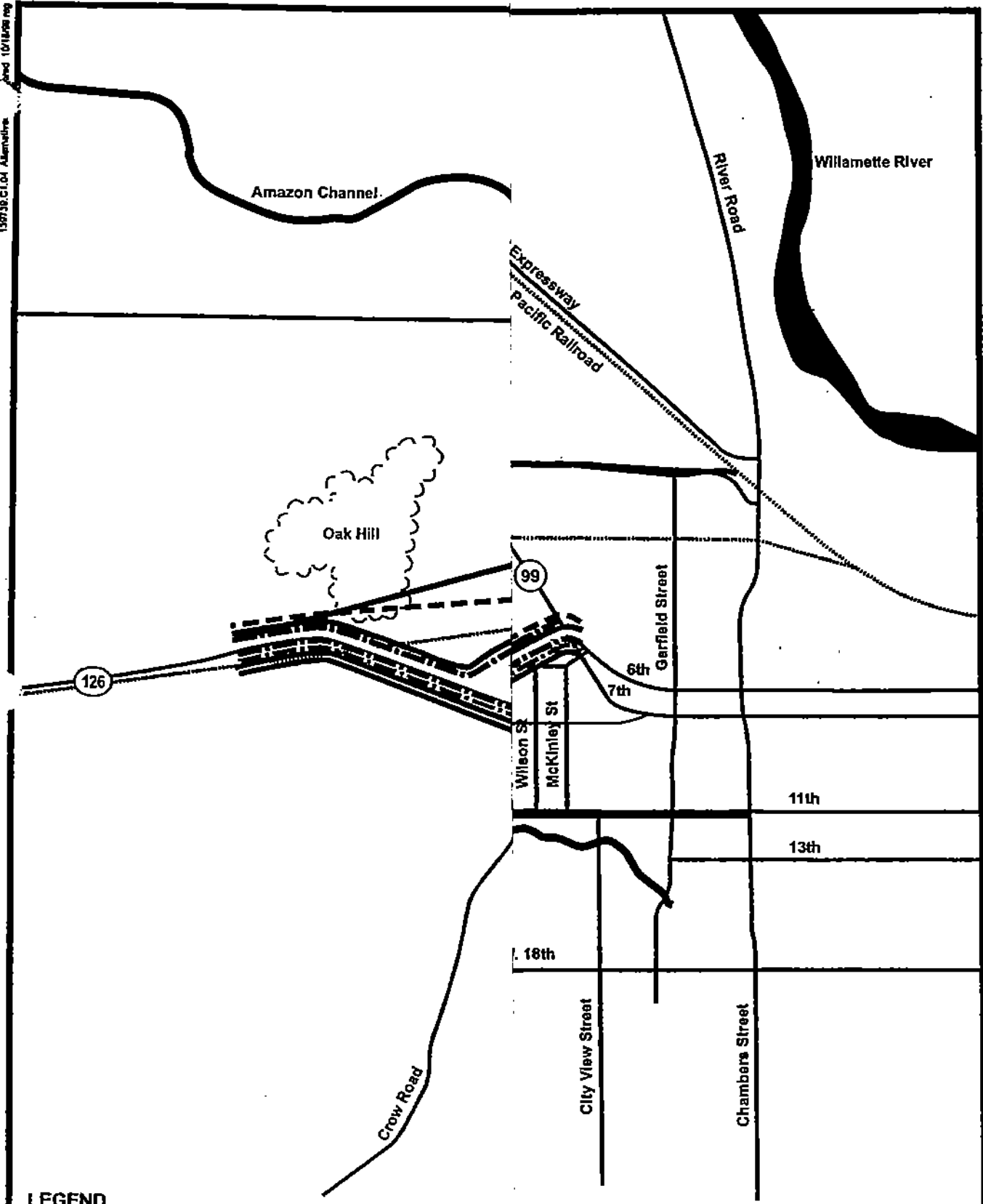
Cost factors include costs for right of way acquisition and relocation rights, sub-grade preparations, drainage features, surfacing, structures, and roadside amenities. Precise values are normally determined at the time of right of way acquisition and construction. Transportation financing in Oregon has not kept pace with inflation during the 1990s. Therefore, costs are critical due to the limited resources available. Safety, pavement conditions, and bridge sufficiency ratings are not meeting minimum service levels and are declining according to presentations made by ODOT to the Oregon Legislature of 1999. While costs alone cannot be the determining factor, relative savings represents potential system improvements to existing facilities elsewhere on the transportation network.

Other relevant factors include reasonableness of alternatives to carry out project goals and objectives, plan consistency, and protection of natural resources.

Comparison of Alternatives

The focus of this section is to consider alternatives that affect non-exception lands, existing exception lands, and exception lands with least impacts that meet transportation operational requirements. This section reports facts about the three most promising alternatives, the southern having two options, from a transportation operations perspective. Figure 1 displays the four most promising alternatives listed below and as previously described in more detail as well as other alternatives described in Appendix C.

- Approved FEIS Alternative, the alignment of which lies south of the railroad tracks west of Danebo Avenue. This alternative does not provide flyover from northbound Highway 99 to westbound WEP. Alignment has received approved use of agricultural lands through goal exceptions adopted in 1986.



LEGEND

- | | |
|--|-------------------------------|
| Recommended Alternative | Alternatives Dismissed |
| — Modified Project Alternative | — EPA and EPA Op |
| Alternatives Considered and Dismissed | — Green Hill Altern |
| — Approved Design Alternative | — Green Hill Altern |
| — Southern Alternative | — West 11th Altern |
| — Southern Modified | — Roosevelt Extent |

Figure 1
Alternatives Considered
 WEST EUGENE PARKWAY
 West 11th Avenue-Garfield Street
 Florence-Eugene Highway

- Northern Alternative (called the Modified Project in the SEIS) which lies north of the railroad tracks west of Danebo Avenue. This alternative provides the flyover at the Highway 99/WEP connection. Alignment is located on exception lands.
- Southern Alternative which reconnects with West 11th Avenue east of Green Hill Road. The alternative provides the flyover at the Highway 99/WEP connection. Alignment does not require goal exceptions.
- Southern (Modified) Alternative, an alignment variation of the Southern Alternative that lies somewhat to the north of the other Southern Alternative and connects with West 11th Avenue slightly west of the other Southern Alternative but east of Green Hill Road. This alternative provides the flyover at the Highway 99/WEP connection. Alignment does not require goal exceptions.

The Southern and Southern (Modified) Alternatives are assumed to have acceptable level of service (LOS) and volume to capacity ratio (V/C) characteristics base upon comparisons between Alternative 1 and Alternatives 2 and 2B in the 1985 DEIS compared with current calculations for the Approved FEIS and Northern Alternatives.

Figure I
Alternatives Considered

Costs and Economic Dislocation:

Table 3 reports a comparison of costs and economic dislocation summary for the four alternatives. ODOT staff collected R/W preliminary estimate information to compare the alternatives. This estimate is based upon new information that details potential costs west of Beltline Highway. Staff performed less new analysis for the areas east of Beltline Highway because the Southern Alternatives do not change the design in this area; for the purposes of this report, costs already developed for the east of Beltline Highway were updated by factoring in general marketplace trends.

Some properties have already been acquired for the WEP. They have been purchased at various times – as long ago as during the Roosevelt Freeway acquisition and as recently as voluntary sales related to coordination of the West Eugene Parkway/Beltline Highway purchases and in coordination with BLM for the implementation of *WEWP*. The cost of these properties is not factored into the estimates provided herein. Rather, the costs shown are estimates of what would be required to complete R/W acquisition under each alignment scenario.

TABLE 3: COSTS AND ECONOMIC DISLOCATION SUMMARY

	Approved FEIS	Northern	Southern	Southern Modified
Residential displacements	0	1 to 3	8 to 10	7 to 9
Business displacements	5 to 10	11 to 14	13 to 14	12 to 14
Estimated No. of R/W Files	25	23	52	57
1998 R/W Cost	\$8,700,000	\$14,780,000	\$30,280,000	\$25,180,000
Construction Costs	\$63,655,465	\$74,006,809	\$85,282,394	\$85,282,394
Total Costs	\$72,355,465	\$88,786,809	\$115,562,394	\$110,462,394
% of Approved FEIS Total Costs	100%	122.7%	159.7%	152.7%

The WEP is designed as a limited access facility to move traffic through the west side of Eugene as part of Highway 126. The existing route follows West 11th Avenue which has been so highly developed with accesses to various businesses that it is very inefficient as a route for through traffic. To avoid similar failure problems, the limited access proposal for the WEP does not allow direct access to individual ownerships.

The West Eugene industrial market is fairly strong after a long lull due in part to developers' concerns over wetland mitigation procedures. The influence of the building of a large Hyundai manufacturing plant in this area, and the advent of the wetland banking process have provided the stimulus to increased development activity. Based on general discussions with local realtors, appraisers and assessors the market is currently experiencing an increase of approximately 6% per year in industrial land prices. This is subject to change at any time because of swings in the

influencing economic market climates. Based on very preliminary data, smaller industrial lots appear to now be selling in the range of \$2.50 to \$3.00/sq. ft. and larger tracts in the \$1.00 to \$1.50/sq. ft. range. Individual properties can fluctuate within this range for a number of reasons, including but not limited to, location, access, utilities, size and availability.

The "Southern Alternative" proposals bisect a large industrial development property, the Green Hill Technology Park, which has been subdivided into industrial lots ranging in size from roughly 4 to 8 acres. These lots have developed street access and all utilities available. The major R/W cost complication comes from landlocking a large portion of the developable land in this park and also landlocking an adjoining large industrial tract to the west due to limiting access to the WEP. Two industrially zoned parcels, 17043200TL #600, containing 78.90+/- acres and 17043212 TL #100, containing 43.23+/- acres, are rendered landlocked by both the Southern and Southern (Modified) alternatives. Remainder parcels on the Southern Alternative consisting of 17043212 TL #200, #300, #400 & #500 and 17043213 TL #200, #400 & #700 are damaged because of lack of access.

Remainder parcels on the Southern (Modified) Alternative consisting of 17043212 TL #200, #300, #500 & 17043213 TL #200 are damaged because of lack of access. These damages amount to large additional costs of millions of dollars for both of these alternatives. A preliminary estimate of the dollar amount these damages contribute to the overall alignment R/W cost estimates given above is in the neighborhood of \$6,200,000 for the Southern (Modified) Alternative and \$7,400,000 for the Southern Alternative, and substantial acreage impacts. In addition, damages could be considered to the Green Hill Technology Park on the south side of the realignment proposals because of shape deficiencies of the impacted lots and the necessity to reconstruct the existing roadways and utility layouts. These damages cannot even begin to be fully analyzed until a formal appraisal of the property could be done.

Other major cost impacts of these alignment alternatives occur in several places. Damages occur under both Southern alignments because of access restriction to the Chevron service station at the corner of Green Hill and West 11th. These restrictions would cause the entire purchase of this property and displacement of the business. The additional land, improvements and business relocation costs would likely put the acquisition of this property alone well over \$1,000,000. This does not include any possible cleanup costs for potential hazardous materials frequently associated with gas stations. The connection of the north end of Terry Street, the necessary access restrictions in the area of the West 11th /Green Hill intersection area and the widening of West 11th to the west of Green Hill to handle the increased traffic load would cause several residential relocations with both Southern alternatives.

It is estimated that there would be six single-family residential relocations necessary because of the Southern (Modified) Alternative and seven because of the Southern Alternative. The residential properties impacted are as follows: 17042823 TL# 11600, 17043100 TL #300, 17043114 TL #300 & #400 (former lots 1704310000407 & 00412), 17043100 TL #500, 17043114 #200 (formerly 1704310000700), and 17043100 TL #1600. The residence on the property at 17043100 TL#1600 would be displaced, but this is a large 99+/- acre parcel that would not necessitate the damaging and buying out of the entire remainder parcel as was necessary with the other smaller lot residences that were impacted.

The additional residential relocation on the South Alignment is anticipated because of impacts to the residence to the east of the Bunks Plus Store on W 11th, located on 17043200 TL# 200. Although ODOT would likely purchase the old store/residence property at the southwest corner of Green Hill and W 11th due to access restriction, it is currently unoccupied and would not be counted as a business or residential relocation. The other business that is estimated to be impacted to the point of

relocation is the Bunks Plus business mentioned above. This relocation would be necessary only under the Southern Alternative.

Other concerns for potential unforeseen residential relocations revolve around how much widening is done along some of the connector roads to handle the off line traffic circulation necessary to make the design options function. Of special concern is the area along West Crow Road (which runs east-west south of W. 11th to the east of Green Hill). There appear to be several wells that are close enough to the road now that they could be impacted depending on final design. If these wells are impacted, they could cause additional relocations.

Estimates of land, improvement, damages, relocation, demolition, labor and legal contingency costs are considered and included in the final estimates to give a better idea of total costs that will be incurred. At the current estimated 6% land appreciation rate, close to a million dollars would need to be added to the estimate by this time next year. Additional millions could be added as the Green Hill Technology Park development starts to add buildings that will be impacted by the project. Construction has begun in some areas of the park already. Based on a rough total build out estimate by Russ Royer, Real Property Officer, with the City of Eugene, total buildout of the park by the time of acquisition could add about \$30 million to the costs in today's dollars.

The best Southern Alternative is 30% higher than the Modified Project. In a transportation revenue constrained environment, this represents approximately 90 intersection safety improvements or 60 miles of rural pavement preservation.

Other Factors:

Table 4 reports a comparison of other factors for the four alternatives. Other relevant factors include reasonableness of alternatives to carry out project goals and objectives, plan consistency, and protection of natural resources. On this basis, the Southern Alternative is not a reasonable alternative for consideration.

It should be noted that Section 4(f) impacts are comparable for all alternatives. The prior determination of BLM properties being classified as Section 4(f) has been reversed by FHWA on the basis of the property not functioning primarily as a park, recreation area, or wildlife or waterfowl refuge. An error was made in the previous determination where all BLM properties were categorically classified as Section 4(f).

TABLE 4: SUMMARY OF OTHER FACTORS

	Approved FEIS	Northern	Southern	Southern Modified
Project Goal consistency	High	High	Low	Low
Plan consistency	High	High to Moderate	Low	Low
Natural Resource Impacts (Wetlands, T&E Plants, T&E Animals)				
High value wetlands, in	11.27	6.39	4.75	5.33

hectares				
% of Approved FEIS High value	100%	56.7%	41.7%	47.0%
Total wetlands, in hectares	13.33	14.40	9.08	9.95
T&E Plants	Willamette Daisy, 22 plants White-topped Aster, 17 clumps	White-topped Aster, 3 clumps	None	Willamette Daisy, 19 plants White-topped Aster, 12 clumps
Nearby T&E plants	Willamette Daisy, 32 w/in 15m White-topped Aster, 8 w/in 15 m	Bradshaw's lomatium, 1 plant w/in 15m Willamette Daisy, 5 w/in 15m White-topped Aster, 8 w/in 15m	Willamette Daisy, >60 w/in 15m Kincaid's Lupine, >235 w/in 50m	Willamette Daisy, >60 w/in 15m White-topped Aster, 1 w/in 15m
Fender's Blue Butterfly (Fed proposed endangered)	None directly; nectaring sources would be reduced	None directly; nectaring sources would be reduced	None directly; Larvae and larval plant 18m south of impact area	None directly; Larvae and larval plant 50m south of impact area
Western Pond Turtle (Fed specie of concern; state sensitive-critical)	Eliminates habitat	Temporary construction impacts	Temporary construction impacts	Temporary construction impacts

For the following additional reasons, both options of the Southern Alternative are deemed unreasonable:

- Natural Disasters and Hazards** – Each of the alternatives will be designed to utilize measures that avoid or minimize damage or loss of life. These measures will include the installation of barriers for protection from steep slopes and large objects and use of temporary and permanent traffic control features (e.g. signs, striping, temporary concrete barrier, raised pavement markers, etc.). However, for the Southern Alternative options, the flooding and Amazon Channel characteristics require spanning the entire length of the floodway. The floodplain is likely to be raised from 1 to 2 feet as a result of implementation of the WEWP. The topography is flat and uncertainty of floodway boundary is high. The structure costs contribute significantly to the overall costs.
- Land Use** – The Southern Alternative is inconsistent with the transportation concept identified in the WEWP where the transportation corridor parallels the railroad tracks. The Southern Alternative bisects remaining developable industrial lands within the WEWP area without providing access to remnant parcels making unavailable a substantial amount of the land designated for development in the plan..

- **Socio-Economic** – This alternative disrupts a social contract or agreement to protect development opportunities as well as protect the natural environment. The WEWP has received national acclaim as a prototype partnership between industry and environmental interests in the development of a comprehensive plan that satisfies regulatory requirements while preserving development opportunity. There has been over \$7 million federal funds invested in the implementation of the *WEWP* as well as private funds. EPA has contributed about \$300,000 in support of the development of the WEWP as a national case study in accommodating wetlands protection and economic development in an urban setting (EPA Nonpoint Source News-Notes, October 1990, Issue #8). EPA also allocated \$100,000 by 1993 for helping other communities adopt the Eugene plan (Nature Conservancy Report 2, September/October 1993). In addition, there is higher risk of costs to acquire property appreciating faster than the Northern Alternative due to potential delays in construction.
- **Hazardous Materials** – There are two additional gas stations impacted located in the NE and SW quadrants of the intersection of Green Hill Road and West 11th Avenue with potentially contaminated soils.
- **Biology** – The Southern Alternative is located in the proximity of the Fender's Blue Butterfly host plant, Kincaid's Lupine. The Fender's Blue Butterfly is federally proposed endangered species. Kincaid's Lupine is federally proposed threatened and state listed threatened species. A recent survey identified egg masses of the Fender's blue butterfly on these lupine plants. USFWS indicated in September 1999 that they expect both species to be federally listed soon. If the WEP were located on either option of the Southern Alternative, it would have a negative affect on the Fender's Blue Butterfly according to regulatory agencies. On the Southern Modified, there are 19 Willamette Valley daisies directly impacted and USFWS expects those plants to be federally listed as endangered very soon eliminating the Southern Modified as a viable alternative.

Appendix A – Purpose and Need

The overall purpose and need for the West Eugene Parkway (WEP) has not changed since issuance of the *1985 Draft Environmental Impact Statement (DEIS)* and *1990 Final Environmental Impact Statement (FEIS)* for the project. The primary purposes of the WEP are to:

- Provide a major access-controlled east-west connecting arterial for intra- and inter-regional and citywide travel through the western half of the City of Eugene, between Highway 126 to the west and the I-5/I-105 corridor to the east
- Improve access to the West Eugene industrial area via direct connections with only strategic crossroads, thereby supporting orderly and planned growth
- Better link West Eugene residential areas with downtown, thereby supporting orderly and planned growth
- Implement an important part of the area-wide roadway system as envisioned in the *Eugene-Springfield Metro Area Transportation Plan (TransPlan)*
- Relieve congestion and improve safety on West 11th Avenue, by removing most intra- and inter-regional and some local traffic from the busiest and most hazardous section of West 11th Avenue

These improvements are needed because of deficiencies in the east-west roadway system, which is failing to support efficient and safe local, citywide, and regional movement of people, goods, and services through West Eugene. West 11th Avenue from the Oak Hill area and as far east as Garfield Street includes numerous features that impede safe and efficient travel, including:

- Numerous signals and intersections
- Extensive commercial development with direct access to the facility
- A complicated connector between West 11th Avenue and the 6th and 7th Avenue Couplet by way of Garfield Street, including two signals and two 90-degree turns
- Highly congested conditions, especially during peak traffic hours, with key intersections experiencing volume to capacity ratios exceeding 1.0 and level of service F conditions

Presently, existing access linkage to the West Eugene industrial area is circuitous. Access problems also apply to links between existing and developing residential areas in West Eugene and downtown Eugene.

The need for an east-west connector in West Eugene has been long recognized. The LCDC acknowledged *TransPlan*, which guides transportation planning in the metropolitan area, and even the *Eugene-Springfield T-2000 Plan*, which preceded *TransPlan*, includes the connector as an important part of the area-wide roadway system envisioned for West Eugene.

Appendix B – Transportation Operations

TABLE B: 2015 LEVEL OF SERVICE (LOS) AND VOLUME TO CAPACITY (V/C RATIO)

Intersection	No Build with TDM (1)	Approved FEIS (2)	Modified (Northern) Alternative (3)	Green Hill @ Grade (4)	Green Hill with Flyover (4)	EPA (5)
		LOS (V/C)	LOS (V/C)	LOS (V/C)	LOS (V/C)	LOS (V/C)
Green Hill/WEP		F	B (0.63)	D/E (86%)	B	
Hwy 99W/WEP		F (1.27)	B (0.57)			
Terry/WEP		A (0.52)	B (0.58)			
Bellline/WEP		F (1.34)	C/D (0.77)			E (0.91)
Bertelsen/WEP		D (0.83)	D (0.78)			
Bailey Hill/WEP		C/D (0.76)	C (0.70)			
Seneca/WEP		F (1.07)	C/D (0.75)			
Green Hill/W 11 th	F (1.05)	B (0.56)	B (0.54)	F (130%)	A	F (1.11)
Danebo/W 11 th	F (1.47)	D (0.80)	C (0.68)			F (1.84)
Bellline/W 11 th	F (1.50)	E (0.96)	C/D (0.77)			F (2.40)
Bertelsen/W 11 th	F (1.29)	F (1.06)	D (0.79)			
Bailey Hill/W 11 th	F (1.21)	D/E (0.88)	D (0.85)*			
Seneca/W 11 th	F (1.21)	E (0.90)	D (0.82)			
99W/Wilson			B (0.62)			
Garfield & 6 th	F (1.36)		D (0.76)			
Garfield & 7 th	F (1.29)		D/E (0.89)			

(1) Note: No Build is defined to include widening for Bellline from West 11th Avenue to NCL (Eugene), Stage 2. The remainder of Bellline and WEP are not included. Reference: *Bud Reiff/LCOG e-mail to Roxann Rivord/ODOT*, September 3, 1999.

(2) Note: *WEP/Bellline Interchange Traffic Analysis Report*, February 19, 1997, Roxann Rivord/ODOT.

(3) Note: Table 2 Level of Service and Volume to Capacity (Design Year 2015) West Eugene Parkway Build Alternatives, August 19, 1999, Roxann Rivord/ODOT

(4) Note: *Green Hill Alternative Traffic Analysis Report*, January 21, 1997, Roxann Rivord/ODOT (for a written description, see Appendix C)

(5) Note: *EPA Alternative Traffic Analysis Report*, January 2, 1997, Roxann Rivord/ODOT and *EPA Alternative Traffic Analysis Report*, July 8, 1998, Roxann Rivord/ODOT (for a written description, see Appendix C)

Appendix C – Summary of Alternatives Dismissed

Goals Exceptions Avoidance Alternatives

An exception to the Statewide Planning Goals was adopted for the Approved Design in 1986. The exception provided the basis for identifying the WEP in the *TransPlan*. Because the Modified Project includes a preliminary alignment lying outside the WEP corridor that was approved through the exception, a new exception is required for the that alternative. The Statewide Planning Goals exception process requires evaluating alternatives to determine their “reasonableness.” A number of alternatives were reviewed in a screening process and failed to pass a basic level of evaluation. The following alternatives are unreasonable on the basis of proven engineering and planning principles.

Transportation System Plan Alternative

The Draft Revision to *TransPlan* incorporates a balanced approach to the use of Transportation Demand Management (TDM), Land Use Measures (LUM), and Transportation System Improvements (TSI) in order to achieve significant improvements over the base case or future trend scenario. TDM implementation relies on voluntary and employer supported programs. LUM includes extensive implementation of mixed use nodal development along corridors that have been designated for development of Bus Rapid Transit (BRT). TSI includes expansion of standard public transit in addition to BRT. This alternative without the WEP is unreasonable because of the extent of continued deterioration of the transportation system in the project vicinity.

Absent the WEP, levels of service (LOS) and volume to capacity ratios (V/C) are in excess of standards. The ‘No Build’ modeling runs include voluntary TDM and V/C ratios exceed 1.0 at numerous intersection locations. In fact, continued degradation of the system amounts to a difference of two LOS grades or more at seven intersections. TDM is expected to affect demand almost 4 times greater than public transportation. Therefore, the combined affect of TDM with transit is virtually no difference in the transportation operations numbers shown for the No-Build with TDM.

West 11th Alternative

This alternative, the widening of West 11th Avenue, could not reasonably meet the need for an access-limited parkway in West Eugene without substantial socioeconomic disruptions, as described below.

Since the 1960s, development along and near West 11th Avenue has proceeded based on land use plans assuming a new east-west transportation corridor would be constructed, at which time West 11th Avenue would serve primarily local travel needs and the commercial and industrial establishments along its length. Consequently, the land use pattern for development along the West 11th corridor focused on commercial and light industrial businesses primarily oriented toward the street.

Beginning in the 1960s, the City of Eugene has completed several successive improvements along West 11th to improve operating conditions (such as safety and capacity) and to bring it up to urban level of service for a major city arterial. In 1993, construction was completed, widening the section between Garfield Street and Tyinn Street by 8 feet to accommodate a turn lane and pedestrian access, thus improving signalization timing, and incorporating access consolidations. These modifications involved substantial right-of-way acquisition. Although studied, widening the road to three lanes

(each direction) was found to be infeasible because of the amount of unacceptable right-of-way acquisition.

Additional roadway safety and capacity improvements are planned in the near future between Danebo Avenue and Green Hill Road. These past and future improvements have been incorporated into the traffic modeling for the project that show a need for the WEP.

As the primary link between Highway 126 to the west and the I-5/I-105 corridor to the east and also a principle street serving local travel, West 11th Avenue from the Oak Hill area to Garfield Street includes numerous features that impede efficient expressway travel, including:

- Numerous signals and intersections
- Traffic flow would be disrupted with short traffic weaving sections causing drivers to move vehicles across lanes at sharp angles thereby increasing the severity of potential crashes
- Transportation operations would function very inefficiently because the forecasted traffic volumes on West 11th make it almost impossible to time signals for optimal vehicle progression
- Over 100 existing commercial enterprises with direct access to West 11th
- An inefficient connection between West 11th Avenue and the 6th and 7th Avenue couplet by way of Garfield Street, including two signals and two 90-degree turns.

Under this minimization alternative, these conditions would all need to be rectified by one or a combination of the following measures:

- Elimination of most direct access to West 11th Avenue through construction of frontage roads or rearrangement of access to other roadways
- Construction of interchanges at strategic intersections serving regional and/or local travel, such as at WEP/Beltline Highway, or construction of elevated crossings at cross streets
- Construction of a complicated, if not impossible, connection between West 11th Avenue and Highway 99 in the Garfield Street area

Each of these actions would require extensive right-of-way modifications to West 11th Avenue and/or other existing or new roads, resulting in adverse effects including:

- Displacement and/or extensive access changes to over 100 commercial and light-industrial businesses immediately adjacent to West 11th, Garfield Street, and 6th and 7th avenues. The changes would require extensive alteration of the overall land use pattern established in the last 25 to 30 years. These actions would severely impact the commercial land base of the city, and also substantially impact local employment, business income, and tax base.

Combined, these impacts would be of such magnitude to render this alternative unreasonable.

Environmental Protection Agency (EPA) Alternative

This alternative proposes a “no-build” condition from the Oak Hill area to Beltline Highway. Nonetheless, the segment of the Modified Project from Beltline Highway to Highway 99 would be constructed. Traffic west of the Beltline/WEP intersection would use West 11th Avenue and Beltline

Highway to access the WEP. The EPA Alternative does not comply with bicycle and pedestrian requirements of the Transportation Planning Rule (TPR).

This alternative fails to meet the project purpose and need because it would not meet the operational requirements of an expressway using only intersections and existing rights-of-way. Numerous intersections fail to meet mobility standards of LOS D or better for signalized and LOS E or better for unsignalized intersections.

- Traffic at the intersection at West 11th and Beltline would be 240 percent over capacity
- Traffic at the intersection at West 11th and Danebo would be 184 percent over capacity
- Traffic at West 11th and Green Hill would be 111 percent over capacity

These congestion problems cause this alternative to be unsafe and inefficient and therefore, unreasonable.

EPA Optimized Alternative

This alternative generally would follow the same concept of the EPA Alternative, except the facility would be designed to meet the level of service requirements of a parkway to the western terminus near Oak Hill. This alternative would potentially require interchanges at WEP/Beltline Highway, Beltline Highway/West 11th Avenue, and West 11th Avenue/Terry Street, and frontage roads along much, if not all, of the section west of Beltline in order to achieve acceptable operating conditions. To address additional capacity requirements and provide for safe operations there would need to be the following changes to the transportation system:

- Added east to west connections between Danebo Avenue and Beltline Highway,
- Closure of the Danebo Avenue/West 11th intersection,
- Extension of Terry Street to West 11th Avenue, and
- Substantial widening (potentially up to a total of 8 lanes along portions) of West 11th Avenue.

Project design engineers and planners have determined that this alternative is not reasonable. There simply is not enough room between Terry Street and the proposed WEP/Beltline Highway interchange (inclusive) to place the three interchanges needed and meet the design requirements of the project. Moreover, any design that would remotely approach meeting the geometric design requirements would:

- Displace substantial property associated with the West Lawn Memorial Park cemetery and/or the Lane Memorial Gardens cemetery
- Displace several commercial or industrial properties in the vicinity of the West 11th Avenue/Terry Street and Beltline/West 11th Avenue interchanges including the Baxter RV Center, and businesses along Arrowsmith Street and Terry Street.

Green Hill Road Alternative

This alternative would use the Modified Project alignment between Highway 99 and Green Hill Road, extending the roadway improvements south of the railroad tracks to the western terminus of the WEP via two optional alignments.

At-Grade (at West 11th Avenue & WEP) Option

For this option, the western end of the new WEP facility would terminate at Green Hill Road with an intersection. Additional capacity improvements would need to be extended south along Green Hill Road. This alternative would impact sensitive species and wet prairie wetlands south of the railroad. A sweeping curve to connect the Green Hill Road and West 11th Avenue leg of the alternative would extend west to the project terminus. Double lefts and double rights would be required at each of the intersections of West 11th Avenue and WEP with Green Hill Road. To the east, the alignment would follow the Modified Project or Northern Alternative to minimize impacts to T&E listed plants. Other features of this alternative include a frontage road to provide local access for properties between the existing Nielsen Road and Green Hill Road as well as an at grade railroad crossing.

For this alternative, driver expectations would be violated creating a condition where the probability of creating a high accident location at the intersection of the WEP with Green Hill Road is unavoidable. Driving conditions from the east to west would be along a high speed access controlled facility where traffic must nearly come to a stop in order to negotiate the curve from the WEP onto Green Hill Road and immediately cross a railroad crossing. There is a high likelihood that the design would result in a high percentage of violent crashes resulting in fatalities and debilitation injuries. Traffic volumes across the railroad track would increase to an excess of 26,000 vehicular crossings per day increasing the number of train/auto conflicts significantly. The proximity of the intersection of the WEP @ Green Hill Road to the railroad crossing conflicts with railroad safety standards.

Consequently, this alternative would be operational unfeasible and unreasonable environmentally.

Flyover (at RR tracks and Approved FEIS) Option

This option would include a flyover grade separation structure over-crossing of Green Hill Road and the railroad tracks, realigning with the Approved FEIS Design corridor along the alignment with an existing goal exception. This option requires using substantial fill south of the tracks and extending to the WEP's western project terminus. Unlike the Approved Design, this option would not include direct access from the WEP onto Green Hill Road.

Adding a new elevated structure to cross the railroad with reversing curves would result in additional safety hazards due to rotating opposite super-elevation rates. Erratic vehicle operation could result as drivers attempt to negotiate the curves, especially at night and during wet and icy pavement conditions. Potential ponding of highway run-off resulting from non-standard design would also present a hazard.

Approximately 4.25 hectares (10.5 acres) of additional fill south of the tracks would occur in Willamette Wet Prairie wetland, which is identified as a very important ecological resource in the *WEWP*. The fill would fragment a large patch of wet prairie wetlands, cutting the surface hydrology connection that now exists. This effective

isolator would be very detrimental to the local ecosystem, especially in the long term. The fill would also impact considerably more rare and protected plant species than the Modified Project.

This option would be operationally unfeasible and unreasonable because of overall operational problems and impacts to rare species and wetlands.

Goals Exceptions Alternative

Roosevelt Extension Alternative

This alternative would include widening Roosevelt Boulevard between Highway 99 and its current terminus, and extending it southwest across open space areas to the proposed WEP terminus. The widening would require additional right-of-way either to the north or south of the existing roadway between Highway 99 and its current terminus at Terry Street. Additional design features would include interchanges at Roosevelt Boulevard/Highway 99 and Roosevelt Boulevard/Beltline Highway, an extensive modification of the Terry Street intersection, and a new intersection at Roosevelt Boulevard/Green Hill Road. Although geometrically this alternative may be feasible, it is not prudent because it would likely result in substantial impacts to the natural and human environment, including:

- Displacement of several commercial businesses at the Roosevelt Boulevard/Highway 99 interchange
- Displacement of numerous residential units and disruption to neighborhood identity/cohesion adjacent to the north side of Roosevelt Boulevard, and/or of numerous commercial/light industrial businesses adjacent to the south side of Roosevelt Boulevard between Highway 99 and Beltline Highway, depending on the placement of the right-of-way.
- Displacement of either additional housing units and disruption to neighborhood identity/cohesion, or use of potential hazardous substances site near the Roosevelt Boulevard/Beltline Highway interchange
- Removal of valuable wetlands and wildlife habitat in and around the Danebo Ponds at the Roosevelt Boulevard/Beltline Highway interchange
- Displacement or loss of numerous features between Beltline Highway and Terry Street through widening the roadway to four lanes, including:
 - Piping the A-3 channel, resulting in loss of important values associated with the existing wildlife habitat corridor; or, relocating the channel, resulting in additional rights-of-way impacts
 - Maintain the A-3 channel and consequently displace up to 25 residential units north of the roadway, plus close three roadways connecting Teralee Street and Roosevelt Boulevard thereby denying access to an estimated 60 residential units (or provide alternative new roadways for their access, which would also displace residential units), resulting in substantial adverse impacts to the affected neighborhood's identity/cohesion
 - Several residential units, and substantially disrupt neighborhood cohesion, in the vicinity of the Roosevelt Boulevard/Terry Street intersection due to the poor

intersecting angle of the roads, thereby further increasing the adverse impacts to the affected neighborhood's identity/cohesion

- Substantial impacts between Terry Street and western project terminus, including:
 - Roadway placement within the Amazon Channel floodway, including areas within the 2-year floodway being considered for floodplain widening under the Army Corps of Engineers' 1135 project
 - Crossing approximately 1.3 km (0.8 mile) of Section 4(f) properties owned by the BLM or City of Eugene for protection/restoration purposes, including bisection of habitats, and displacement of two wetland/ponds/vernal pools between the current end of Roosevelt Boulevard and the Amazon Channel
 - Potential direct or indirect impacts to ESA-listed species located in the vicinity of the Roosevelt/Green Hill Road intersection

Combined, these impacts would be of such magnitude to commercial land inventory, employment, local income and tax base, community cohesion, and protection of habitat areas included in the West Eugene Wetlands Plan area, as to render this alternative not prudent.

Appendix D – Evaluation Framework

The following information was extracted from project records. Over the course of the project, concepts and alternatives have been evaluated using this framework in one format or another. For the purposes of evaluating the consistency of decision making, the framework was developed as a guideline for selecting the Modified Project as the preferred alternative.

Transportation Operational Feasibility

Constraints:

- Level of Service Standards
- Safety Design Standards
- Limited Access Urban Expressway Access Management Classification

Project Goals:

- Move through traffic east to west
- Relieve traffic on West 11th Avenue
- Provide access to the extent this is possible and practical

Project Objectives:

- LOS D or better for signalized intersections
- LOS E or better for unsignalized intersections
- Public road access for at grade/interchanges at ½ to 1 mile minimum spacing
- Private drive access is limited to right in/right out on 800' spacing
- Partial median control will be used to preserve transportation operations
- ODOT Highway Design Manual
- Design speed of 60 mph is used for determining safety design standards

Performance Measures:

- Mobility expressed as V/C Ratio and/or LOS
- Cost expressed in dollars
- Access and constructibility expressed qualitatively

Natural Resources Factors

Constraints:

- Willamette River – Greenway Goal of Statewide Planning Goals
- Agricultural Lands – Statewide Planning Goals
- Biological – federal Endangered Species Act
- West Lawn Memorial Park & Cemetery – these are not 4(f) resources
- Amazon Channel – Floodway/Flood Plain FEMA
- Wetlands – WEWP, DSL, and ACE

Goals:

- Avoiding Bertelsen Slough
- Avoid regulated floodplain
- Avoid, minimize, and mitigate impacts to wetlands
- Avoid impacts to threatened and endangered species.

Objectives:

To respect the Bertelsen natural areas

Performance Measures:

Area and quality of wetland plant communities affected
T&E listing status and avoidance of impacts to listed species
Acceptance of mitigation
Issuance of 404 Permit

Economic Dislocations - Social/Economic/Cultural Factors

Constraints:

Keeping intact large parcels of land with commercial/industrial development potential
Avoiding existing substantial commercial/industrial development

Goals:

Facilitate future development (in the UGB)

Objectives:

To disturb existing businesses as little as possible
To closely follow property lines and thus not divide large parcels
To miss the existing cemetery on Danebo

Performance Measures:

Neighborhood impacts/City Charter Amendments
Residential and business dislocations

Appendix E – Related Projects

One major reason for undertaking the West Eugene Wetlands Study was to solve the issue of how the City might recoup some of the remaining capacity for over \$12,000,000 worth of existing infrastructure already extended into the west Eugene region. There are other examples where projects are currently moving forward under the premise of planned growth, with the WEP as an integral component of local plans. In recent years, projects have been developed not only to accommodate the WEP. Specifically, the 11-35 Project developed cooperatively by the US Army Corps of Engineers and City of Eugene was designed to accommodate the alignment of the Modified Project for the segment north of the railroad tracks.

Beltline Highway

Phase 1, stage 1 of this project is constructed. Phase 1, stage 2 is scheduled for a construction bid submittal in November 1999. The interchange at the crossing of WEP and Beltline is not currently programmed for funding and scheduled for construction, but has been completed through the NEPA process. The final configuration will provide four lanes with full access control from West 11th Avenue to Highway 99 (North City Limits) and construction of a grade separated interchange at the crossing of the WEP.

West Eugene Development

The urban growth boundary (UGB) in the West Eugene area generally extends to Green Hill Road. All of the development projects described below are consistent with the long-range planning designations for the West Eugene area. While projects such as Hyundai (Willow Creek area) have been envisioned in Eugene planning documents, their development is much more of a certainty. Hyundai will generate additional support businesses in the West Eugene area, and will soon place demands upon housing supply.

Pacific Scanning Systems Expansions

The Pacific Scanning Systems site accesses West 11th Avenue via Terry Street. Additional expansions of this facility have been under discussion, but no current activity is underway.

Green Hill Technology Park

The technology park's subdivision has been approved and the infrastructure for the first phase is constructed, including a loop road off West 11th Avenue west of Terry Street. The technology park's approved subdivision includes 17 lots ranging in size from approximately 1.6 hectares (approximately 4 acres) to 6.9 hectares (17 acres), consistent with Campus Industrial zoning (light industrial). Rosen Products completed their first phase and by September 1999 employed over 200 workers. Approximately 15 hectares (37 acres) of agricultural wetland will be filled by the technology park development. Wetland mitigation has occurred on properties north of the CORP railroad tracks and west of Danebo Avenue.

Barger/Beltline Commercial/Residential Development

Vacant land in the northeast quadrant of the Beltline/Barger intersection is being developed. This area is nearing buildout with a Winco Store, AM-PM mini-market/gas station,

McDonalds and a couple of other businesses. At buildout, this area is anticipated to have 15 acres of Commercial, and 77 acres of Medium and High Density Residential. (This development area lies beyond that shown in Figure 2-6 of the Draft SEIS.)

Royal/Danebo Commercial/Residential Development

A planned mixed-use development node at this location includes 10 acres of Commercial, and 30 acres of Medium Density Residential. The property is vacant, and there is no proposal to develop the property.

West Bethel-Danebo Commercial/Residential Development

Located on the north side of Royal between Terry and Green Hill, 5 acres of Commercial and 20 acres of Medium Density Residential is planned. The property is vacant, and there is no proposal to develop the property.

Willow Creek Area

The Hyundai electronics manufacturing facility, in the 83 hectare (205 acre) Willow Creek Industrial Park, is located south of the project vicinity near the intersection of 18th Avenue and Willow Creek Road.

Development of the Hyundai semiconductor manufacturing facility includes filling 10.4 acres of wetlands located within the Willow Creek drainage with possibly another 11 acres being filled if Phase III is implemented. The overall density of workers per acre approved for the Hyundai facility is consistent with planned uses for the Willow Creek area.

Additional industrial and residential development will be occurring south of West 11th.

West Eugene Wetlands

Within the approximately 8,000-acre West Eugene Wetlands Study Area considered in the *WEWP*, approximately 1,800 acres of wetlands are likely to be preserved/developed, interspersed with residential, commercial, and industrial development.

Amazon Creek Enhancement Project

This project was completed in 1998 and involves creek widening and development of a bike path south of the WEP alignment between Bailey Hill Road and the UPRR tracks near Terry. It is funded through the Intermodal Surface Transportation Efficiency Act (ISTEA).

11-35 Project

This project is under construction where removal of dikes and restoration of the floodplain is planned by the U.S. Army Corps of Engineers (COE) just north of the project area between Terry Street and Green Hill Road. BLM, City of Eugene, and COE designed the project in coordination with the location of the alignment associated with the Modified Project of the WEP by leaving the area open for development as a new transportation corridor.

Tax Lot 600 Mitigation Site

The Tax Lot 600 wetlands mitigation site is located northwest of Terry and the WEP's north alignment option. The Terry Street connection has been moved east to avoid impacting this mitigation site. The Tax Lot 600 project mitigates Green Hill Technology Park development.

Terry Street Extension

This City of Eugene project was completed in 1999, as used in modeling for the WEP project, would improve and extend Terry Street from the WEP north to Royal Avenue. It would eventually extend to Barger Boulevard similar to that proposed as project number 242 in *TransPlan*. The project would not improve and extend Terry Street between the Central Oregon and Pacific railroad and West 11th Avenue.

Appendix F – Reference List

Supplemental Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, August 1997, ODOT

West Eugene Parkway Supplemental Needs Analysis, September 1994, Lane Council of Governments

Analysis and Findings on the Potential for Public Transportation in the Eugene-Springfield Area, August 29, 1997, Lane Council of Governments

Draft Revised TransPlan The Eugene-Springfield Transportation System Plan, May 1999, Lane Council of Governments

Table 2: Level of Service and Volume to Capacity (Design Year 2015), West Eugene Parkway Build Alternatives, August 19, 1999, Roxann Rivord/ODOT

Transportation Demand Management Task Force Final Report, June 1994, Lane Council of Governments

TransPlan Update Transportation Demand Management Strategies: Technical Evaluation and Model Results, July 1995, Lane Council of Governments

Analysis of the Suitability and Effectiveness of TDM Strategies in Selected Areas, TGM Grant, No date shown, Lane Council of Governments

Interview with Steve Reed/ODOT, SPIS Support, September 2, 1999

Need for 4 Lanes west of Beltline E-mail, May 8, 1997, Roxann Rivord/ODOT

Southern Alternative Traffic Analysis Report, December 1997, Roxann Rivord/ODOT

Green Hill Alternative Traffic Analysis Report, January 21, 1997, Roxann Rivord/ODOT

WEP/Beltline Interchange Traffic Analysis Report, February 19, 1997, Roxann Rivord/ODOT

WEP/Beltline Interchange Timing Requirement E-mail, January 3, 1997, Roxann Rivord/ODOT

EPA Alternative Traffic Analysis Report, January 2, 1997, Roxann Rivord/ODOT

EPA Alternative Traffic Analysis Report, July 8, 1998, Roxann Rivord/ODOT

West Eugene Wetland Plan, 1992, City of Eugene and Lane Council of Governments

Draft West Eugene Wetlands Plan Treatment of the West Eugene Parkway FEIS Alignment, December 3, 1998, Lane Council of Governments

West Eugene Wetlands Special Area Study, Draft Technical Report, April 1991, Lane Council of Governments

Wetland Executive Team (WET) Statement of Partnership, Revised 1996, City of Eugene, Bureau of Land Management, The Nature Conservancy, Youth Conservation Corps, and Army Corps of Engineers

Proposed Order and Conditions to City of Eugene, 1994, Division of State Lands

Data Matrix for Alternatives Analysis – West Eugene Parkway Technical Memorandum, November 17, 1998, Dave Mayfield/USR Greiner Woodward Clyde, Wetland Areas by Mike Shippey

Section 4(f) Applicability Determination Memorandum, June 30, 1999, Hank Honeywell, FHWA Division Administrator

Wetland Delineation Verification Report: West 11th Street – Garfield Street, Florence-Eugene Highway (West Eugene Parkway) Unit 2, Fishman Environmental Services

Biological Evaluation of the Effects West 11th – Garfield Street (West Eugene Parkway), Lane County Oregon on the Western Pond Turtle, Fishman Environmental Services 1994

Incompatible Adjacent Land Uses in the WEP Project Area

PREPARED FOR: Mark Greenfield
PREPARED BY: Sheryl Christensen
DATE: July 30, 1999

Introduction

This technical memorandum addresses incompatible land uses that are adjacent to the proposed West Eugene Parkway (WEP) northern alignments (Approved Design and Modified Project). This information is intended to support a Statewide Planning Goal Exceptions statement. Therefore, land uses are evaluated for the Exception area, which includes lands adjacent to the proposed alignment outside of the urban growth boundary (UGB).

The following information was obtained by reviewing relevant plans and documents, conducting a half-day field survey, and corresponding with the Lane County Assessor's Office, Lane County Land Management Division, and property owners in the project area.

Definitions

The "project area" includes properties outside the UGB (Greenhill Road) that border the proposed alternatives being considered in the Statewide Planning Goals Exception Statement for the proposed WEP project, and is the focus of this memorandum (See Figure 1).

The "properties" referenced in this technical memorandum include tax lots as identified by the Lane County Assessor's Office. These do not necessarily correspond to legal parcels as defined by property deeds. Some property owners divide their legally deeded properties into two or more tax lots.

Table 1 illustrates a parcel identification index for the "properties" within the area directly being considered under the Planning Goals Exception process for the proposed WEP project. Throughout this technical memorandum, reference to these property numbers are derived from this index. Property and/or acreage figures provided are based on estimates provided by the Lane County Assessor's Office.

Alternatives Descriptions

The proposed West Eugene Parkway (WEP) would provide a 8.9 to 9.4-kilometer (5.6-to 5.8-mile) limited access roadway with bike lanes from the Oak Hill area west of Eugene in Lane County (on Highway 126) to Highway 99W and Garfield Street in Eugene.

The Approved Design involves constructing WEP on a new alignment, creating an 8.9 kilometer (5.5-mile) extension of the 6th and 7th Avenue Couplet. The western limit of the Approved Design would be west of the intersection of Highway 126 and Goble Lane near Oak Hill. It would have four 3.6 meter (12-foot) wide travel lanes, a 4.4-meter (14-foot) wide median, and 2.4-meter (8 foot) wide shoulder/bike lanes.

Several modifications have been proposed for the Approved Design, resulting in the Modified Project, which is a 9.3-kilometer (5.8-mile) long alignment. This would be located along the north side of the Central Oregon and Pacific Railroad (CORP) alignment west of Terry Street, rather than along the south side as proposed in the Approved Design. This would be accomplished with a grade-separated crossing over the tracks and the Amazon Channel near Terry Street, and would also require that the project be lengthened about 400 meters (1,300 feet) on the west end at its connection with Highway 126. Like the Approved Design, the Modified Project would have four 3.6-meter (12-foot) wide travel lanes with 2.4-meter (8-foot) wide shoulders on the outside of the lanes. The center median would vary in width from 3.6 to 4.4 meters (12 to 14 feet). See Figure 1 for location of both alternatives in the project area.

In general, both alternatives would improve accessibility to points west of the WEP, including Veneta and other nearby communities. Improved access would contribute to the liveability of the area and influence future development.

Planning Context

The project area is located outside the UGB and would therefore primarily be under the land use jurisdiction of Lane County. The Approved Design would be in Lane County from its western terminus to Greenhill Road, where it would cross into Eugene. The Modified Project would be subject to Lane County land use jurisdiction from the western end to Terry Street, where it would cross Eugene's city limits.

Although the Lane County Rural Comprehensive Plan guides future land uses outside the Metro planning area, future land uses in much of the project area will also be influenced by special wetland protection and development provisions of the West Eugene Wetlands Plan (WEWP). The WEWP is a refinement of the Eugene-Springfield Metropolitan Area General Plan, 1987, a guiding document for public decisions affecting the metropolitan region.

As identified in the WEWP, the West Eugene Wetlands Study Area extends approximately 1.3 kilometers (.8 miles) west of Greenhill Road into the project area. Within this part of the project area, wetlands are identified (Palustrine Emergent, Scrub-Shrub & Prairie Grasslands) to be protected, developed, or enhanced for mitigation credit. Further information regarding wetlands and T&E species can be found in the following documents:

FES. 1994. Alternatives Analysis for the West Eugene Parkway, West 11th Street-Garfield Street, Florence-Eugene Highway, South Alternative vs. North Alternative, Highway 126 to Danebo Road. Fishman Environmental Services, Portland, Oregon.

FES. 1996. Biological Assessment on the Effects of the West 11th Street-Garfield Street West Eugene Parkway on Bradshaw's Lomatium, *Lomatium bradshawii*. Fishman Environmental Services, Portland, Oregon.

FES. 1994. Biological Evaluation. Effects of the West 11th Street-Garfield Street West Eugene Parkway on the Western Pond Turtle (*Clemmys marmorata*). Fishman Environmental Services, Portland, Oregon.

Galen, C. 1995. Threatened and Endangered botanical Surveys for West 11th St. -Garfield St., Florence-Eugene Highway, Lane County Project (West Eugene Parkway). Fishman Environmental Services, Portland, Oregon. Memorandum.

LCOG. 1991 West Eugene Wetlands Special Study Area. Lane [County] Council of Governments, Eugene, Oregon. Technical Report.

LCOG. 1992. West Eugene Wetlands Plan. Lane [County] Council of Governments, Eugene, Oregon.

FHWA and ODOT. 1985. Draft Environmental Impact Statement. West 11th-Garfield, Florence-Eugene Highway. Lane County Federal Highway Administration and Oregon Department of Transportation, Salem, Oregon.

Powers, R. 1983. Biology Technical Report: W 11th-Garfield, 6th-7th Street Extension, Lane County, Oregon. Oregon Department of Transportation, Salem, Oregon.

Testa, Nicholas. 1996. Technical Report-Biology-West Eugene Parkway (Northern Design Option), West 11th Street-Garfield Street Project, Lane County, Oregon. Key #07996. Oregon Department of Transportation, Salem, Oregon.

An Urban Reserve Area extends approximately 1.1 kilometers (.7 miles) outside the UGB, past Greenhill Road into the project area. This area has been identified, based on current trends and policies, as an area for future urban development. Urban level services will not be extended to this urban reserve area until it is included within the urban growth boundary through future amendments or updates. There are no plans to amend or update the UGB in the near future. Until it is added to the urban growth boundary, this Urban Reserve Area will be designated to protect natural resource values.

Land Uses of the Project Area

The entire project area is designated Exclusive Farm Use (EFU) or E40-acre minimum lot size. In addition, most of the project area is classified as either prime farmland by the NRCS or high-value farmland according to the Lane County Soil Ratings for Forestry and Agriculture. Consequently, this area is subject to the farmland preservation objectives of Statewide Planning Goal 3, and would be expected to maintain the land base for farm enterprises and preservation of natural resources.

However, there are two specific exceptions to continuation of this overall rural land use pattern within this E40-zoned area, as follows:

- Preservation and restoration of wetlands
- Development of WEP

The Bureau of Land Management (BLM) and Oregon Department of Transportation (ODOT) are currently in the process of purchasing property for wetland mitigation and wetland/upland restoration efforts, respectively. ODOT has already purchased approximately 14 hectares (35 acres). Nearly all of the properties west of Greenhill Road to the western project terminus on the north and south side of the railroad are owned by ODOT, thereby restricting their development potential. The BLM has not acquired any lands in the project area to date.

Although the Lane County Rural Comprehensive Plan states that agriculture will continue to be the predominant land use west of Greenhill Road, the current public ownership of the properties for primarily open space (vacant) and/or wetland mitigation uses is expected to preclude future use of the properties for agricultural production.

Currently, in addition to vacant ODOT lands, the project area is primarily characterized by rural single family residences and small farms. Most of the farms in the project area do not provide a primary source of income to the farm operators/owners. They are more typical of hobby farms. Many of the parcels include timber lots or open pasture areas, some of which could be called small-scale farms insofar as their primary use is residential and any farming does not produce a primary source of income for residents. Portions of some of these properties are not farmed and contain patches of forested or other unused areas.

The only large scale farming operations include a 51 hectare (126-acre) cattle operation (170431 1500 and 1600), a 61 hectare (151-acre) grass seed farm (170536 400), and a 40 hectare (100-acre) hay pastures, which is considered a low-productivity agricultural use (See Table 1 for details). There is also a horse breeding, training and boarding business along West 11th Avenue (170431 403), and several smaller (10- to 20-acre) hay fields.

There is no commercial use occurring in the project area, and one public facility, the BPA Lane Substation, is located south of Highway 126, near the west end of the project. Immediately west of the project area there are Rural Residential 5-acre minimum and 10-acre minimum designations (north of Highway 126), and the United States Fish and Wildlife (USFWS) Fern Ridge Wildlife Area (south of Highway 126).

The following table lists tax lots, property owners, total acres, and the type of use occurring on each property adjacent to the proposed project.

Location Township, Range, Section	Tax Lot	Owner	Acres	Existing Land Use
17 04 30	1402	Chernecki, Eddy O & Carol A.	1.02	Driveway Hay pasture
	1405	Bishop, Dean & Vicki L.	5.57	Residence
	1406	Wentz, Fred N & Audrey E	3.07	Residence, horses, calves
	1409	Nolte Richard	4.99	Residence, sheep
	1600	Fleer, Billy A & Lois L	1.95	Residence
	1800	Harvel, Ervin R TE	42.51	Residence, hay pastures
	1801	ODOT	1.05?	Vacant
	1900	Oregon State Land Board	2.47	Vacant
	2200	Jorgensen Kurt D & Laura K	8.71	Residence (?)
	2201	ODOT	24.65	Vacant
	2202	Oregon State Highway Commission	19.6	Vacant
	2204	O'Reilly Patrick Timothy TE	1.52	Vacant
	2300	Goldsmith Robert E	2.1	Residence
	2400	Southern Pacific Co.	1.62	Vacant
17 04 31	100	ODOT	4.93	Vacant
	101	Eugene Water & Electric Board	1.15	Vacant-plans to build an electrical substation in the next few years.
	200	MBM Group LLC	33.2	Vacant
	201	ODOT	1.15	Vacant
	202	ODOT	2.14	Vacant
	203	ODOT	0.68	Vacant
	204	ODOT	0.59	Vacant
	205	ODOT	<1.0	Vacant
	300	Tredgold, Donald W.	4.7	Residence, car restoration
	400	YI Kenneth K S	21.76	Hay pasture, blueberries
403	Ware, Robert P. and Gayle S.	10	Residence, horses, hay	

Location Township, Range, Section	Tax Lot	Owner	Acres	Existing Land Use
17 04 31 (continued)	405	Purvis, Margaret M.	5.44	Vacant
	500	Hayes, Dale R ay and Beth e B	5.09	Residence, vacant fields
	1100	Southern Pacific Co.	9.61	Vacant
	1400	Robertson Marilyn M	3.15	Vacant residence
	1500	Allendar John	26.11	Residence, cattle, hay
	1600	Allendar, John	99.4	“ “ “ “
17 05 25	2400	Kleingartner, Evelyn, Skoog, John E.	84.08	Hay pasture
	2401	Meduna, Joseph & Evelyn	18.5	Vacant (?)
	2402	Skoog, John & Florence	17.0	Hay pasture
17 05 36	100	Skoog John E., and Kleingartner, Evelyn	2.25	Vacant
	200	Robertson Marilyn M	22.0	Vacant
	300	Scnchina Paul & Patricia A	6.65	Residence
	400	Estergard P E & B K 1-2	150.92	Grass seed
	401	USACE	81.83	BPA Lane Substation

Set out below is a more detailed description of the project area by property ownership.

Chernecki Property (1704301402)

This 1-acre property is a driveway providing access to five properties.

Bishop Property (1704301405)

This approximately 5.6 acre property contains a house (28335 West 11th Avenue) and open field.

Wentz Property (1704301406)

This approximately 3-acre property is used primarily for raising horses and calves (hobby farm). The property contains a house (28333 West 11th Avenue), outbuildings, and pasture.

Nolte Property (1704301409)

This approximately 5-acre property is used primarily for raising sheep (hobby farm). The property contains a house (28329 West 11th Avenue).

Fleer Property (1704301600)

This approximately 2-acre property contains a house (28275 West 11th Avenue) and open field.

Harvel Property (1704301800)

This approximately 42.5 acre property contains two residences, for one family (28473 Goble Lane), outbuildings, an orchard, and hay pastures. The orchard contains approximately 24 trees that produce cherries, pears, apples, and plums (for personal consumption). There are two hay pastures, totaling approximately 20 acres. The Harvels do not earn any income off their land; they hire a person to process the hay for fire safety. However, in the future, the Harvels may plant and sell cottonwoods for a secondary income. They also may partition and sell a 5 to 8 acre piece of land (just north of the railroad tracks), but are concerned about this land being impacted by the WEP.

ODOT Properties (1704301801, 1704302201, 170431100, 170431201-205)

These properties total approximately 35.2 acres adjacent to the proposed alignments, and have been acquired over the years in anticipation of the WEP project. These lands are all vacant.

Oregon State Land Board Property (1704301900)

This approximately 2.5 acre property is currently vacant.

Jorgensen Property (1704302200)

This approximately 8.7 acre property contains a house (28579 Goble Lane), barn, and several outbuildings. It is a small farm operation providing secondary income with horses, pigs and chickens.

Oregon State Highway Commission Property (1704302202)

This approximately 19.6 acre property is vacant.

O'Reilly Property (1704302204)

This approximately 1.5 acre property is vacant.

Goldsmith Property (1704302300)

This approximately 2.1 acre property contains a house (28573 Goble Lane) and barn for horses.

Southern Pacific Company Properties (1704302400, 1704311100)

These properties total approximately 11.2 acres that are currently vacant.

Eugene Water & Electric Board Property (170431101)

This approximately 1.2 acre property is vacant. They have plans to build an electrical substation in the next few years. Transmission lines are already in place.

MBM Group Property (170431200)

This approximately 33.2 acre property is currently vacant.

Tredgold Property (170431300)

This approximately 4.7 acre property contains a house (28614 West 11th Avenue), chicken coops for egg production, and old cars that are restored. In the past, they have also had EMU's on their property.

Yi Property (170431400)

This approximately 21.8 acre property contains a hay pasture and blueberries. The hay pasture is approximately 19 acres and there are approximately 200 blueberry plants on nearly 2 acres. There is no residence or buildings on the property. Mr. Yi is interested in developing most of this land as an RV Park, but needs to get a zone change before this can happen.

Ware Property (170431403)

This approximately 10 acres contains a house (28690 West 11th Avenue), horses, "Field of Dreams Training and Boarding Facility and Breeders of Norwegian Fjord Horses". Nearly 9 acres of this property provides hay pasture for their horses.

Purvis Property (170431405)

This approximately 5.4 acre property is vacant.

Hayes Property (170431500)

This approximately 5.1 acre property contains a house (88130 Greenhill Road), and vacant fields.

Robertson Properties (1704311400, 170536200)

These properties total approximately 25.5 acres, containing a vacant house (28295 K R Nielsen Road) and vacant field.

Allendar Properties (1704311500, 1704311600)

These properties total approximately 125.51 acres, on which there is a house (28536 West 11th Avenue), cattle operation and hay pastures. Mr. Allendar owns property on both sides of West 11th Avenue. It does not appear as though this property owner transports cattle to the north field. It used to be an orchard but appears to be no longer in use.

Kleingartner/Skoog Properties (1705252400, 170536100)

These properties total approximately 86.3 acres used primarily as hay pasture.

Meduna Property (1705252401)

This approximately 18.5 acre property is used as hay pasture.

Skoog Property (1705252402)

This approximately 17-acre property is used as hay pasture.

Senchina Property (170536300)

This approximately 6.7 acre property contains a house (27299 K R Nielsen Road).

Estergard Property (170536400)

This approximately 151-acre property is used to grow grass seed.

USACE Property (170536401)

This approximately 81.8 acre property contains the Bonneville Power Administration (BPA) Lane Substation.

Summary of Impacts

Land use impacts usually associated with roadway projects in rural lands include:

- Displacements of houses and buildings
- Acreage losses from roadway rights-of-way and/or uneconomic remnants
- Parcelization, resulting in more complicated farming practices
- Complication of access to properties
- Visual modifications to the rural setting
- Potential induced (incompatible) development

Displacements of houses and buildings

Neither alternative would displace any residences or outbuildings in the project area.

Acreage losses from roadway rights-of-way and/or uneconomic remnants

As mentioned previously, the BLM and ODOT have plans to purchase adjacent lands for wetland mitigation and wetland/upland restoration efforts, respectively. ODOT has already purchased a significant portion of adjacent lands. WEP would not result in acreage losses of the three large farm operations in the project area; Allendar (170431 1500 and 1600), Estergard (170536 400) and Kleingartner/Skoog (170525 2400). Additionally, there would not be any uneconomic remnants as a result of the project.

Parcelization, resulting in more complicated farming practices

The Approved Design would create several parcels between West 11th Avenue and the CORP railroad tracks. However, this land is all in ODOT ownership. Neither alternative would result in the parcelization of any agricultural properties.

Complication of access to properties

Both alternatives could impact access to the five residential properties on Goble Lane.

Visual modifications to the rural setting

With any road improvement project, visual modifications are inevitable. However, existing Highway 126 already dissects this rural area, thereby increasing urban character. WEP would also increase urban character of the area.

Potential Induced development

WEP could expedite urban development in the Urban Reserve Area, and may result in increased rural residential development, particularly near the western project terminus designated Rural Residential 5-acre minimum lot size (RR5) and Rural Residential 10-acre minimum lot size (RR10). These uses are not incompatible with existing plans and designations.

Conclusion

The WEP would not have any major impacts on land uses in the project area. In general, it is compatible with adjacent uses. This is due to several factors:

- Many of the adjacent lands are currently owned by ODOT
- Adjacent lands are in the process of being purchased by ODOT and the BLM for wetland mitigation and preservation purposes
- The remaining adjacent properties are primarily single family residential with unused land or small hobby farms.

Lands within project right-of-way are either vacant, unused by property owners, or used to grow hay crops, which is considered a low-value agricultural use. The three large scale farm operations in the project area would not be negatively impacted by the project.

One Final Note:

A few property owners were concerned about losing land and/or rural character of the area (i.e., visual changes, increase in traffic noise). However, the majority of property owners viewed WEP as very positive.