Exhibit AAAA

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Kate Brown, Governor

RECEIVED
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Planning Dept.

August 20, 2015

JOHN ADAM, LONG RANGE PLANNING MANAGER
CITY OF MEDFORD PLANNING DEPARTMENT
200 S. IVY, ROOM 240
MEDFORD, OR 97501

Re: Urban Growth Boundary (UGB) Amendment (CP-14-114).

Thank you for the opportunity to review the proposal to amend the Urban Growth Boundary (UGB) for the purpose of providing a twenty-year land supply based on the City's projected need for residential and employment land. The proposed changes include: amending (expanding) the UGB, assigning General Land Use Plan (GLUP) map designations to the areas added to the UGB; amending the Medford Street Functional Classification Plan of the Transportation Element of the Comprehensive Plan to include the expansion areas; and amending some portions of the Urbanization and GLUP Elements of the Comprehensive Plan to accommodate the UGB amendment. The developable acres consist of 884 acres for residential development (783 acres of Urban Low-Density Residential (UR), 18 acres of Urban Medium-Density Residential (UM), and 83 acres of Urban High-Density Residential (UH) and 636 acres for employment uses (222 acres of Service Commercial (SC), 317 acres of Commercial (CM), 90 acres of General Industrial (GI), and 7 acres of Heavy Industrial (HI)).

ODOT staff has reviewed the Planning Commission Report to City Council for a Class-A legislative decision: Comprehensive Plan, Urban Growth Boundary Amendment dated July 21, 2015 and has comments on Exhibit A: Proposed Urban Growth Boundary Amendment (Page 2 of 11), Exhibit B: Findings (Page 36) pertaining to Goal 12 (Transportation), Exhibit B: Findings (Page 37) pertaining to Goal 14 (Urbanization), and Appendix J: Transportation Memo (page 139-142) pertaining to both Transportation Planning and Analysis Unit (TPAU) modeling scenarios and "scoring" blocks of external study areas (ESAs) MD 1 through MD 9.

- Exhibit A: Proposed Urban Growth Boundary Amendment (Page 2 of 11) - Exhibit A shows a Functional Classification Plan map for the City of Medford with proposed future growth areas and associated Future Higher Order Streets. The legend states that Future Higher Order Streets will have "street classification to be determined through future analysis." Will this "future analysis" occur during the update of the City of Medford TSP that is in process now? Upgrades to functional classifications may trigger significant effect under the transportation planning rule (TPR).

- Exhibit B: Findings (Page 36) - ODOT concurs with the following language out of the report pertaining to Goal 12 (Transportation):

"Land added to the UGB through this amendment will remain under the jurisdiction of Jackson County

(Urban Growth Management Agreement will apply) and will retain its current County zoning until it is annexed to the City. Prior to the annexation of any of the land added to the UGB through this amendment, a revised Transportation System Plan (TSP), which includes the areas added through this amendment, must be adopted. The revised TSP will address transportation needs throughout the entire revised UGB. Areas within the UGB but outside the City Limit must go through the annexation and the zone change process before they are assigned a standard city zone and made available for urban-level development. The City, as a criterion for zone change, requires a demonstration of facilities adequacy for transportation prior to approving any zone change that would allow for urban development. OAR 660-024-0020(d) states: "The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary." Since all land added through this amendment will retain the zoning that was assigned prior to inclusion in the boundary, the transportation planning rule does not apply to this amendment. Transportation system needs and transportation system adequacy will be addressed both prior to annexation and through the zone change process.

Work is well underway to complete a revised TSP for the City which will include a comprehensive overhaul of the existing TSP. Work on the TSP cannot be completed until the location of the revised boundary is known."

- Exhibit B: Findings (Page 37) - ODOT does not concur with the following language out of the report pertaining to Goal 14 (Urbanization):

"The proposed UGB expansion area meets the requirements of all Goal 14 factors."

ODOT understands that the Rogue Valley Metropolitan Planning Organization (RVMPO) Policy Committee has affirmed the UGB amendment and is in the process of providing a letter of support to the City of Medford on this proposal. However, the RVMPO Policy Committee would like to see more specific plans for each individual future growth area presented before them at a future date.

  - ODOT recommends that each future growth area be presented individually with more specific analysis included before the Medford City Council for individual adoption as opposed to recommending adoption of all the future growth areas at once as is currently proposed.

- Appendix J: Transportation Memo (Page 139) - Appendix J mentions four different growth scenarios that were requested to be modeled by TPAU. ODOT would like to clarify the following discrepancies within the Transportation Memo:

  - It appears when reading the first two paragraphs of the Transportation Memo that the four TPAU model runs have been completed. The TPAU model runs have not been fully completed at this time. The City of Medford TSP is in the process of being updated.
  - The first paragraph of the Transportation Memo states that the South Stage Road I-5 overpass was included within the TPAU model runs. The potential South Stage Road I-5 overpass is not fiscally constrained and would not be a project funded by ODOT.
  - The first paragraph of the Transportation Memo also states that Springbrook Road was not included as a north-south connection to East Vilas Road within the TPAU model runs. However on page 171 it states that MD-2 was "bumped up

slightly because a Springbrook Road extension to East Vilas Road would provide an alternative to Crater Lake Highway (OR 62).

- MD-5 (3) has the potential to impact the Fern Valley Interchange (Interchange 24) with proposed residential uses. Alternate mobility standards are in place on that interchange that are more restrictive to residential and commercial uses.

- Appendix J: Transportation Memo (Page 139 - 142) - Appendix J explains how City of Medford staff "scored" large blocks of the ESAs on a five-tiered scale. Each of the maps (MD 1 through MD 9) shows each MD with a color coordinated 1 through 5 designation. ODOT has provided the following "letter grades" to MD 1 through MD 9 based on the ability of the State to serve the various areas of the expanded UGB with transportation facilities:

MD	ODOT Letter Grade
1 (Northeast)	F
2 (Northeast	F
3 (Northeast)	F
4 (Southeast)	C
5 - 1(Southeast)	F
5 - 2(Southeast)	F
5 - 3(Southeast)	F
6 (Southwest)	F
7 (Southwest)	F
8 (Southwest)	C
9 (Southwest)	C

You may contact me at 541-774-6399 if you have any further questions or require additional information.

Thank you,

Don Morehouse
Senior Transportation Planner, Development Review

Cc: Mike Baker