



Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

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September 22, 2023

Adam Hanks, City Administrator
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Matt Rodrigues, Assistant City Manager
City of Eugene
99 W 10th Ave
Eugene, OR 97401

Dan Hurley, Public Works Director
Lane County
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Sandy Belson, Comprehensive Planning Manager
City of Springfield
225 Fifth St
Springfield, OR 97477

By Email: adam.hanks@ci.coburg.or.us, MRodrigues@eugene-or.gov,
lcpwadmn@lanecountyor.gov, sbelson@springfield-or.gov

Subject: Regional Combined Work Program

Dear Administrator Hanks, Manager Rodrigues, Director Hurley, and Manager Belson,

I am writing in response to the region's revised combined work program dated August 1, 2023 for compliance with portions of the Oregon Administrative Rules (OAR) chapter 660, divisions 44 and 12. As provided in OAR 660-012-0012(3)(d), the combined work program is intended to meet the requirements of OAR 660-044-0100 and OAR 660-012-0012(3).

Regional Work Program

The combined work program included a request for the following dates for regional work program tasks as provided in OAR 660-012-0015(2):

- A date of December 31, 2024 for OAR 660-044-0015(2)(a)(B) to prepare and submit a land use and transportation scenario plan as provided in OAR 660-044-0120.
- A date of December 31, 2029 for OAR 660-044-0015(2)(a)(C) to adopt local amendments as provided in OAR 660-044-0130.

OAR 660-044-0015(4)(b) provides for the director to consult with the Oregon Department of Transportation to review proposed work programs. The director may choose to approve the work program or refer the work program to the commission with recommended revisions.

The rule does not provide decision-making criteria for the director, however the rule does provide for factors in OAR 660-055-0015(5)(c) for the commission to make a decision. These factors are:

(c) When considering whether to issue an order, the commission shall consider the following factors using the best available data:

- (A) Greenhouse gas emissions including actual measurements, model estimates, recent trends, and future projections under current adopted plans;
- (B) Local transportation and land use actions that influence greenhouse gas emissions and more equitable outcomes, including adopted plans, recent actions by cities and counties, and development trends;
- (C) Population growth including recent trends and future projections;
- (D) Presence or absence of regional cooperation on greenhouse gas emissions reduction;
- (E) Vehicles miles traveled per capita in the metropolitan area, including actual measurements, model estimates, recent trends, and future projections under current adopted plans; and
- (F) State and local funding available for scenario planning.

Using these factors, the **requested dates for the regional work program are granted**. A summary of this approval is included in Attachment A.

Alternative Dates

The combined work program included a request for the following alternative dates as provided in OAR 660-012-0012(3):

City of Coburg

- An alternative date of June 30, 2025 for OAR 660-012-0012(4)(e) to adopt land use regulations as provided in OAR 660-012-0330.
- An alternative date of June 30, 2025 for OAR 660-012-0012(4)(f) to adopt parking regulations as provided in OAR 660-012-0400 through 0445.

City of Eugene

- An alternative date of December 31, 2026 for OAR 660-012-0012(4)(c) to adopt land use requirements as provided in OAR 660-012-0315.
- An alternative date of December 31, 2029 for OAR 660-012-0012(4)(e) to adopt land use regulations as provided in OAR 660-012-0330.

City of Springfield

- An alternative date of December 31, 2029 for OAR 660-012-0012(4)(b) to adopt transportation performance standards as provided in OAR 660-012-0215.
- An alternative date of December 31, 2026 for OAR 660-012-0012(4)(c) to adopt land use requirements as provided in OAR 660-012-0315.
- An alternative date of December 31, 2029 for OAR 660-012-0012(4)(e) to adopt land use regulations as provided in OAR 660-012-0330.

The combined work program included some requests for alternative dates for deadlines provided in OAR 660-012-0012(5). The rule does not provide for the director to adjust these dates. The commission has directed the department to develop amendments to the rule which could change some of these dates. I expect the commission to consider adoption of these amendments in November 2023.

I have considered each of the criteria in OAR 660-012-0012(3)(e) in granting these alternative dates. The criteria are:

- (e) The director shall review the proposed alternative dates to determine whether the proposed alternative dates meet the following criteria:
 - (A) Ensures urgent action;
 - (B) Coordinates actions across jurisdictions within the metropolitan area;
 - (C) Coordinates with work required as provided in OAR 660-044-0100;
 - (D) Sequences elements into a logical progression; and
 - (E) Considers availability of funding and other resources to complete the work.

I find that the cities meet the criteria in OAR 660-012-0012(3)(e), and therefore the **alternative dates are granted**. A summary of this approval is included in Attachments B through D. The cities of Eugene and Springfield have previously approved alternative dates; these are included in the attachments.

Sincerely,



Brenda Bateman, Ph.D.
Director

CC: Matt Crall, DLCD Planning Services Division Manager
Erik Havig, ODOT Statewide Policy and Planning Manager
Patrick Wingard, DLCD Regional Representative
Naomi Zwerdling, ODOT Region 2 Planning Manager
Theresa Conley, ODOT Transportation Planner
Bill Holmstrom, DLCD Land Use and Transportation Planning Coordinator
Evan Manvel, DLCD Climate Mitigation Planner
Cody Meyer, DLCD Land Use and Transportation Planner
Kelly Clarke, Lane Council of Governments
Megan Winner, City of Coburg Planner
Alissa Hansen, City of Eugene Planning Director
Lydia Bishop, City of Eugene Building and Permit Services Director
Jenifer Willer, PE, City of Eugene City Engineer
Rob Inerfeld, City of Eugene Transportation Planning Manager
Terri Harding, City of Eugene Principal Planner
Sasha Vartanian, Transportation Planning Supervisor
Andrew Larson, City of Springfield Transportation Planner

Attachment A
Regional Work Program Dates – Central Lane

The region has been granted the following dates for regional work program tasks as provided in OAR 660-012-0012(3).

- A date of December 31, 2024 is approved for OAR 660-044-0015(2)(a)(B) to prepare and submit a land use and transportation scenario plan as provided in:
OAR 660-044-0120: Commission Review of a Land Use and Transportation Scenario Plan
- A date of December 31, 2029 is approved for OAR 660-044-0015(2)(a)(C) to adopt local amendments as provided in:
OAR 660-044-0130: Local Amendments to Implement Approved Land Use and Transportation Scenario Plan

**Attachment B
Alternative Dates – City of Coburg**

The city has been granted the following alternative dates as provided in OAR 660-012-0012(3).

- An alternative date of June 30, 2025 is approved for OAR 660-012-0012(4)(e) to adopt land use regulations as provided in:
OAR 660-012-0330: Land Use Requirements
- An alternative date of June 30, 2025 is approved for OAR 660-012-0012(4)(f) to adopt comprehensive plan amendments and land use regulations as provided in:
OAR 660-012-0400: Parking Management
OAR 660-012-0405: Parking Regulation Improvements
OAR 660-012-0415: Parking Maximums and Evaluation in More Populous Communities
OAR 660-012-0420: Exemption for Communities without Parking Mandates
OAR 660-012-0425: Reducing the Burden of Parking Mandates
OAR 660-012-0430: Reduction of Parking Mandates for Development Types
OAR 660-012-0435: Parking Reform in Climate Friendly Areas
OAR 660-012-0440: Parking Reform Near Transit Corridors
OAR 660-012-0445: Parking Management Alternative Approaches

The department approves this with the understanding until that date, the City will not be enforcing parking mandates, per OAR 660-012-0012(4)(f).

Attachment C
Alternative Dates – City of Eugene

The city has been granted the following alternative dates as provided in OAR 660-012-0012(3).

- An alternative date of December 31, 2026 is approved for OAR 660-012-0012(4)(c) to adopt land use requirements as provided in:
 - OAR 660-012-0315: Designation of Climate Friendly Areas

- An alternative date of December 31, 2029 is approved for OAR 660-012-0012(4)(e) to adopt land use regulations as provided in:
 - OAR 660-012-0330: Land Use Requirements

- An alternative date of December 31, 2023 is approved for OAR 660-012-0012(4)(f) to adopt comprehensive plan amendments and land use regulations as provided in:
 - OAR 660-012-0400: Parking Management
 - OAR 660-012-0405: Parking Regulation Improvements
 - OAR 660-012-0415: Parking Maximums and Evaluation in More Populous Communities
 - OAR 660-012-0420: Exemption for Communities without Parking Mandates
 - OAR 660-012-0425: Reducing the Burden of Parking Mandates
 - OAR 660-012-0430: Reduction of Parking Mandates for Development Types
 - OAR 660-012-0435: Parking Reform in Climate Friendly Areas
 - OAR 660-012-0440: Parking Reform Near Transit Corridors
 - OAR 660-012-0445: Parking Management Alternative Approaches
 - OAR 660-012-0450: Parking Management in More Populous Communities

Attachment D Alternative Dates – City of Springfield

The city has been granted the following alternative dates as provided in OAR 660-012-0012(3).

- An alternative date of December 31, 2029 is approved for OAR 660-012-0012(4)(b) to adopt transportation performance standards as provided in:
OAR 660-012-0215: Transportation Performance Standards
- An alternative date of December 31, 2026 is approved for OAR 660-012-0012(4)(c) to adopt land use requirements as provided in:
OAR 660-012-0315: Designation of Climate Friendly Areas
- An alternative date of December 31, 2029 is approved for OAR 660-012-0012(4)(e) to adopt land use regulations as provided in:
OAR 660-012-0330: Land Use Requirements
- An alternative date of December 31, 2023 is approved for OAR 660-012-0012(4)(f) to adopt comprehensive plan amendments and land use regulations as provided in:
 - OAR 660-012-0400: Parking Management
 - OAR 660-012-0405: Parking Regulation Improvements
 - OAR 660-012-0415: Parking Maximums and Evaluation in More Populous Communities
 - OAR 660-012-0420: Exemption for Communities without Parking Mandates
 - OAR 660-012-0425: Reducing the Burden of Parking Mandates
 - OAR 660-012-0430: Reduction of Parking Mandates for Development Types
 - OAR 660-012-0435: Parking Reform in Climate Friendly Areas
 - OAR 660-012-0440: Parking Reform Near Transit Corridors
 - OAR 660-012-0445: Parking Management Alternative Approaches
 - OAR 660-012-0450: Parking Management in More Populous Communities