

**Oregon Department of Land Conservation and Development
Order Approving Land Use and Transportation Scenario Plan Submitted by
Eugene, Springfield, Coburg, and Lane County**

DLCD Order 001957

September 25, 2025

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I. Decision

The Oregon Department of Land Conservation and Development (DLCD or department) approves the land use and transportation scenario plan submitted by the City of Eugene, the City of Springfield, the City of Coburg, and Lane County on June 27, 2025 (the “Plan”). For the reasons explained in this order, the department has determined that the Plan meets the requirements in Oregon Administrative Rule (OAR) chapter 660, division 44.

II. Review Procedures and Criteria

OAR 660-044-0120 provides for the review of land use and transportation scenario plans.

OAR 660-044-0120(2) provides for the director to make a determination of completeness upon submission of the land use and transportation scenario plan. If the land use and transportation scenario plan is not complete, the rule provides for the director to notify the submitter and for the submitter to send additional information.

OAR 660-044-0120(2)(b) provides for the department to post a copy of the land use and transportation scenario plan on the department website and for the director to provide notice and opportunity to provide comment regarding the submitted land use and transportation scenario plan.

OAR 660-044-0120(2)(c) provides for the director to either issue an order approving the submittal, with responses to any objections submitted; or refer the submittal to the commission for review and action.

OAR 660-044-0120(3) provides for the director to send an approval order to the cities and counties, post on a public website using the Internet or a similar electronic method, and provide a copy of the order to the commission at its next regular meeting. The approval order must include information on the process to appeal the director’s order as described in this rule.

OAR 660-044-0120(4) provides for a person who has filed an objection to appeal the director’s approval order to the commission. An appeal must be submitted within 30 days of the date of the commission meeting(s) at which the commission received the order. An appeal must clearly identify an alleged deficiency in the submittal based on the requirements in the rules.

OAR 660-044-0120(5) provides for the commission to hold a hearing on a submittal referred by the director under OAR 660-044-0120(2) or appealed under OAR 660-044-0120(4). The commission may either remand the submittal with specific directions for needed changes consistent with the requirements of the division or approve the submittal.

OAR 660-044-0120(6) provides for the director to issue an order of the commission’s decision to the cities and counties and to all participants in the hearing.

III. Overview of Requirements for a Land Use and Transportation Scenario Plan

A. Applicable Rules

OAR 660-044-0015 provides the compliance schedule for the cities and counties in each Oregon metropolitan area.

OAR 660-044-0015(2) provides the compliance schedule for the cities and counties within the Central Lane Metropolitan Planning Organization: Eugene, Springfield, Coburg, and Lane County.

OAR 660-044-0015(2)(a)(A) provides for the cities and county to submit a work program containing all of the elements provided in OAR 660-044-0100 for the department to review by June 30, 2023.

OAR 660-044-0015(2)(a)(B) provides for the cities and county to prepare a land use and transportation scenario plan as provided in OAR 660-044-0110 and submit it for review by the department as provided in OAR 660-044-0120 by December 31, 2023 or another date in the approved work program.

OAR 660-044-0015(2)(b) allows the cities and county to use the preferred scenario submitted to the commission and legislature in 2015 as required by Oregon Laws 2010, chapter 865, as the basis for the land use and transportation scenario plan.

OAR 660-044-0015(2)(b)(A) allows the cities and county to rely on prior work that produced the 2015 preferred scenario.

OAR 660-044-0015(2)(b)(B) provides that the cities and county produce additional elements that build on the 2015 preferred scenario to prepare a complete transportation and land use scenario plan, as provided in OAR 660-044-0110(3) and 660-044-0110(9) through (10).

B. Contents of Land Use and Transportation Scenario Plan

OAR 660-044-0110 provides the required contents of a land use and transportation scenario plan.

OAR 660-044-0015(2)(b)(B) requires that Eugene, Springfield, Coburg, and Lane County produce additional elements that build on the 2015 preferred scenario to prepare a complete transportation and land use scenario plan. Those elements are provided in OAR 660-044-0110(3) and 660-044-0110(9) through (10).

OAR 660-044-0110(3) provides for a land use and transportation scenario plan to include policies and strategies intended to achieve the applicable greenhouse gas emissions reduction target in OAR 660-044-0025.

OAR 660-044-0110(9) provides for a land use and transportation scenario plan to include policies, performance measures, and methodologies that cities and counties will use to report on implementation of the preferred land use and transportation scenario, including:

- (a) Regional performance measures to determine whether outcomes are progressing to achieve the projected reductions in greenhouse gas emissions. The regional performance measures must include actual performance for the data elements used to project greenhouse gas emissions as described in OAR 660-044-0030.

(b) Local implementation performance measures to determine whether cities and counties are taking the actions necessary to implement the preferred land use and transportation scenario.

(c) Equity performance measures to determine whether implementation of the preferred land use and transportation scenario is improving equitable outcomes for underserved communities.

OAR 660-044-0110(10) provides for the performance measures in section (9) to include:

- (a) A set of performance measures including methods, details, and assumptions to calculate the value;
- (b) Baseline current data, or historical data, for each performance measure;
- (c) A reporting schedule repeating every four or five years through the planning period;
- (d) A target for each performance measure for each reporting point; and
- (e) Best available demographic information for underserved populations.

IV. Director's Review

A. Jurisdiction

The director and, if appealed, the commission have authority to review land use and transportation scenario plans as provided in OAR 660-044-0120 and Oregon Revised Statutes (ORS) 197.040. See also ORS 197.012.

B. Scope of Review

The relevant review criteria are set forth in Section II (above).

C. Director Evaluation

The director reviewed the Plan, as well as objections to that Plan, to determine which finding to make.

The director finds that the Plan satisfies the applicable criteria. The cities of Eugene, Springfield, Coburg, and Lane County will need to make significant changes to their comprehensive plans, land use regulations, and transportation system plans to be consistent with and implement the approved land use and transportation scenario plan. In addition, the cities of Eugene, Springfield, and Lane County will need to demonstrate progress towards meeting the performance targets of the approved land use and transportation scenario in their major reports to the department.

1. 2015 Central Lane Scenario Plan

The cities of Eugene, Springfield, Coburg, and Lane County submitted the Central Lane Scenario Plan to the department in January 2015 and the Oregon State Legislature in June 2015.

2. Division 44 Work Program

The cities of Eugene, Springfield, Coburg, and Lane County submitted the Central Lane Work Program as required by OAR 660-044-0015(2) to the department on June 30, 2023. The department approved the work program on September 23, 2023. The cities and county requested an extension for the submission of the land use and transportation scenario plan on October 25, 2024, and the department approved the request on December 16, 2024. The approved date for preparing a land use and transportation scenario plan as provided in OAR 660-044-0110 and to submit it for review by the commission as provided in OAR 660-044-0120 was June 30, 2025.

3. Land Use and Transportation Scenario Plan

The cities of Eugene, Springfield, Coburg, and Lane County the Plan on June 27, 2025. The department determined that the Plan was complete. The department delivered notice to provide comment regarding the Plan as provided in OAR 660-044-0120(2) on July 28, 2025. The notice provided for objections to be submitted by August 11, 2025.

The Plan includes the 2015 Central Lane Scenario Plan submitted to the Land Conservation and Development Commission and Oregon State legislature in 2015 as required by Oregon Laws 2010, chapter 865.

The Plan also includes additional elements that meet the requirements in OAR 660-044-0110(3). The Plan includes strategies for achieving the preferred scenario (page 15), an assessment of policies taken to implement the preferred scenario since 2015, and additional policies needed to achieve the greenhouse gas emissions reduction target (page 38, “Future areas of focus”).

The Plan also includes additional elements that meet the requirements in OAR 660-044-0110(9). The Plan includes performance measures and methodologies that cities and counties will use to report on implementation of the preferred land use and transportation scenario (page 38). These include regional performance measures, local implementation performance measures, and equity performance measures.

The Plan includes additional elements that meet the requirements in OAR 660-044-0110(10). The Plan includes performance measures that include methods to calculate the value for each measure, baseline data for each measure, reporting schedules, a target for each measure, and best available demographic information on underserved populations (page 38).

V. Objections Received

The department delivered notice and solicited objections within a 14-day period as provided in OAR 660-044-0120(2)(b). The department received one set of objections from Bob Cortright, dated August 10, 2025 (“Objections”). The Objections argue that the Plan should be returned to local jurisdictions to “(1) revise the [P]lan to include policies which commit local jurisdictions to adopt plan amendments and take other actions needed to achieve VMT reductions and (2) provide modeling and analysis of [Plan] policies that demonstrates [Plan] policies will achieve VMT reduction targets.” In support of this requested relief, the Objections make four sub-objections, which are summarized below with analysis by the department.

A. The land use and transportation scenario plan does not include and adopt required policies.

Objection Summary: The first sub-objection (Objections, page 1) states that the Plan does not include the required policies and strategies as provided in OAR 660-044-0110(3). The sub-objection claims that the Plan only includes strategies, performance measures, and targets that do not commit to or implement the plan, and that the local governments need to develop and adopt policies that will commit them to implementing the plan.

Department Analysis: The implementation chapter of the Plan (Implementing the Preferred Scenario, page 38) includes strategies from the preferred scenario, assessment of current local policies (Appendix A), and “Future areas of focus.” These strategies and future areas of focus satisfy OAR 660-044-0110(3)’s requirement that the Plan include “[p]olicies and strategies intended to achieve the applicable greenhouse gas emissions reduction target in OAR 660-044-0025.”

The Objection correctly states that the cities and counties must adopt policies to implement the land use and transportation scenario. OAR 660-044-0130(1) requires that after the department approves the land use and transportation scenario plan, then local governments must “amend comprehensive plans, land use regulations, and transportation system plans to be consistent with and implement relevant portions of the land use and transportation scenario plan.” Local governments would make these amendments to their local plans after the director’s approval of the Plan.

Therefore, the director rejects this sub-objection.

B. The land use and transportation scenario plan does not achieve required greenhouse gas reduction targets.

Objection Summary: The second sub-objection (Objections, page 3) states that the Plan does not satisfy OAR 660-044-0110(3) because the Plan does not provide evidence that it would achieve the greenhouse gas reduction target in OAR 660-044-0025. The sub-objection asserts that the modeling used to develop the Plan assumes more extensive and effective actions than is included in the Plan’s policies and strategies. The sub-objection concludes that the Plan needs to be amended to add policies that adopt the actions assumed in the modeling.

Department Analysis: OAR 660-044-0110(3) requires “Policies and strategies intended to achieve the applicable greenhouse gas emissions reduction target in OAR 660-044-0025.” The Plan includes elements that satisfy the requirements in OAR 660-044-0110(3). The Plan includes strategies for achieving the preferred scenario (page 15), an assessment of policies taken to implement the preferred scenario since 2015, and additional policies needed to achieve the greenhouse gas emissions reduction target (page 38 -“Future areas of focus”). While the sub-objection includes examples of strategies in the Plan that are alleged to be deficient in achieving the levels of ambition included in the modeling, it does not show that the Plan’s policies and strategies fail to satisfy the rule’s requirements.

Therefore, the director rejects this sub-objection.

C. The land use and transportation scenario plan is inconsistent with requirements for walkable, mixed use/climate-friendly areas.

Objection Summary: The third sub-objection (Objections, page 5) states that the Plan does not meet OAR 660-044-0110(3) because the estimates of vehicle miles travelled is inconsistent with ODOT's Statewide Transportation Strategy and Climate-Friendly and Equitable Communities rules that direct local governments to plan for 30% of all housing in walkable, mixed use/climate-friendly areas. The sub-objection claims that the Plan will result in less than 15% of the region's housing in highly walkable mixed-use areas. The sub-objection concludes that the Plan needs to be amended to include strategies and policies to accommodate 30% of all housing in climate-friendly areas.

Department Analysis: OAR 660-012-0315 includes specific requirements for certain cities and counties to designate areas sufficient to accommodate at least 30% of their current and future housing needs in walkable mixed-use areas. ODOT's Statewide Transportation Strategy includes a strategy that 30% of all urban households will be within compact, mixed-use neighborhoods by 2050. OAR 660-044-0015(2)(b) provides if the cities and county submit the 2015 Central Lane Scenario Plan submitted to the Land Conservation and Development Commission and Oregon State legislature in 2015 as required by Oregon Laws 2010, chapter 865, they are only required to produce the additional elements in OAR 660-044-0110 sections (3), (9), and (10). The submittal from the cities and county includes the 2015 land use and transportation scenario plan; therefore, only sections (3), (9), and (10) of OAR 660-044-0110 apply to the evaluation of the Plan.

OAR 660-044-0110(3) does not require the Plan to account for 30% of all housing in walkable mixed use areas. Instead, the rule requires only that a land use and transportation scenario plan include "policies and strategies intended to achieve the applicable greenhouse gas emissions reduction target." There may be many scenarios and associated policies and strategies that would meet the target. The rules provide flexibility for cities and counties to select any scenario that meets the target. There is no requirement in OAR 660-044-0110(3) that a land use and transportation scenario plan to include the climate friendly areas in OAR 660-012-0315 or be consistent with the land use strategies or policies as included in the Statewide Transportation Strategy.

Therefore, the director rejects this sub-objection.

D. The land use and transportation scenario plan is inconsistent with requirements for parking pricing.

Objection Summary: The fourth sub-objection (Objections, page 6) asserts that the Plan does not meet OAR 660-044-0110(3) because strategies for parking pricing are inconsistent with ODOT's Statewide Transportation Strategy. The sub-objection claims that the Plan includes only a minimal increase in parking management which is unlikely to result in vehicle miles traveled reduction. The sub-objection concludes that the Plan needs to be updated to include parking pricing strategies consistent with the Statewide Transportation Strategy.

Department Analysis: OAR 660-044-0110(3) provides a requirement that a land use and transportation scenario plan include "policies and strategies intended to achieve the applicable greenhouse gas emissions reduction target." As discussed above, there may be many scenarios

and associated policies and strategies that would meet the target, and the rules provide flexibility for cities and counties to select any scenario that meets the target. There is no requirement in division 44 that a land use and transportation scenario plan be consistent with the parking strategies or policies as included in the Statewide Transportation Strategy.

Therefore, the director rejects this sub-objection.

In summary, the director finds that the Objection raised relevant questions about the Plan submitted to the department in meeting the requirements in division 44. The Objection did not, however, provide adequate evidence that the Plan does not meet the applicable requirements of OAR 660-044, and the director therefore rejects the Objection.

VI. Conclusion

The Plan submitted by Eugene, Springfield, Coburg, and Lane County addresses the requirements as provided in OAR 660-044-0015(2) and OAR 660-044-0110. The director therefore approves the Plan, as provided in OAR 660-044-0120(2)(c).

Signed this 25th day of September 2025



Brenda Bateman, Ph.D.
Director, Oregon Department of Land Conservation and Development

VII. Appeal of this Order

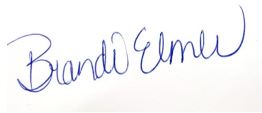
This order may be appealed to the commission as provided in OAR 660-044-0120(4). Only parties who submitted objections to the Plan may appeal this order. Any appeal must be received within 30 days of the date of the commission meeting at which the commission received the director's approval order.

As provided in OAR 660-044-0120(5), the compliance hearing will provide an opportunity for Eugene, Springfield, Coburg, and Lane County, and any persons who submitted comment to provide written and oral testimony to the commission.

VIII. Certificate Of Service

I certify that on September 25, 2025, I served the attached "Department of Land Conservation and Development Order Approving Land Use and Transportation Scenario Plan Submitted by Eugene, Springfield, Coburg, and Lane County" to the addresses listed below by email and by mailing in a sealed envelope with first-class postage prepaid.

Party	Email	US Postal Service
Eugene	MRodrigues@eugene-or.gov	Matt Rodrigues, Assistant City Manager City of Eugene 99 W 10th Ave Eugene, OR 97401
Springfield	sbelson@springfield-or.gov	Sandy Belson, Comprehensive Planning Manager City of Springfield 225 Fifth St Springfield, OR 97477
Coburg	adam.hanks@ci.coburg.or.us	Adam Hanks, City Administrator City of Coburg 91136 N Willamette St Coburg, OR 97408
Lane County	lcpwadm@lanecountyor.gov	Dan Hurley, Public Works Director Lane County 3040 N. Delta Hwy Eugene, OR 97408
Bob Cortright	23cort@gmail.com	Bob Cortright 373 Summercrest Ave NW Salem, OR 97304



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