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TECH MEMO



DATE: November 3, 2026

TO: Coos County Planning Commission & Board of Commissioners

FROM: Kelly Sandow P.E.
Sandow Engineering

RE: Peppermill Zone Change-Response to Opposition Comments

The following provides a response to opposition testimony from Carla Faganello.

Comment:
"4. Violation of Goal 12 (Transportation): Unmitigated Traffic Safety Hazards on Two Mile Lane
Under the state's Transportation Planning Rule (OAR 660-012-0060), a rezone cannot be approved if it significantly affects an existing transportation facility without mitigation. Two Mile Lane and China Creek Road are narrow, rural corridors built for low-density resource vehicles and existing local homes. They lack the structural framework—such as turn lanes, shoulders, and structural depth—to accommodate the heightened daily vehicle trips generated by a new residential subdivision or commercial zone. Increasing density here directly creates severe traffic safety hazards, particularly at the high-speed intersection where local traffic must merge onto Highway 101. The applicant has failed to provide a Traffic Impact Analysis (TIA) proving that our local road infrastructure can safely absorb this influx of vehicles."

Response:
OAR 660-012-0060 is very specific to the standards and criteria for determining significant affect for zone changes. As per OAR 660-012-0060 (1), significant affect is defined as :

(a) A change in functional classification
(b) A change in the standards implementing a functional classification
(c) Degradation of the performance of an intersection to not meet the adopted standards at the end of the planning period identified in the Transportation System Plan.

As demonstrated in the Transportation Planning Rule Analysis prepared by Sandow Engineering, dated February 20, 2026:

- A majority of vehicle trips to/from the site will be from the new site access to the west to Highway 101.
- The functional classification of Two Mile Lane is Major Collector. As per Coos County's Transportation System Plan, a Major Collector serves

higher traffic demands, serving over 2,500 vehicle trips per day, and serves a variety of vehicle types. Arterial Streets are the only higher-order streets above Major Collector. Arterial Streets are intended to distribute regional traffic between cities and counties with an emphasis on serving through traffic.

- The level of trips that could be generated by the development will not require the change of Two Mile Lane to an Arterial Street and will not require a change in standards for determining the functional classification.
- The intersection of Highway 101 at Two-Mile Lane will meet ODOT's performance standards at the end of the TSP planning period. Additionally, new access connections onto Two-Mile Lane

The criteria of OAR 660-012-0060 for determining significant affect are not met.

As per ODOT criteria, Sandow Engineering provided an additional safety evaluation of the intersection of Highway 101 at Two Mile Lane. The safety evaluation determined:

1) Existing crash patterns and review of geometric conditions do not indicate a safety issue that needs mitigating.
2) Based on the evaluation of queuing a separate southbound left turn lane is recommended on Highway 101, and separate left and right turn lanes on Two Mile Lane are recommended.

The Transportation Planning Rule Analysis provided a comprehensive evaluation of the impacts from the zone change as per OAR 660-012-0060 and additional safety and operational impacts as per ODOT requirements. Based on this evaluation, improvements mitigating impacts from the zone change are recommended and will be constructed at the time of development.