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January 26, 2012

VIA HAND DELIVERY

Planning Commission Members and
Transportation Commission Members
c/o Mike Faught, Public Works Director
City of Ashland
51 Winburn Way
Ashland, OR 97520

RE: City of Ashland Transportation System Plan Update
Joint Planning & Transportation Commission Meeting 01/26/2012
Further Commissioner Discussion of Preferred and
Financially Constrained TSP Amendment Updates
Road Project R25 - Washington St. Extension to Tolman Crk.Rd.

Dear Planning and Transportation Commission Members:

Thank you for entertaining my comments offered, on behalf of our clients, IPCO and the Brombacher family (collectively "IPCO"), during the public forum portion of your previous November 7th and November 29th joint meetings concerning City's proposed updates to its Transportation System Plan.

IPCO owns the property between Tolman Creek Road and Washington Street, as indicated on the attached aerial map. *See attached "B" depicting IPCO Property.*

Two Washington Street Extension alternatives are offered in the Plan documents (Roadway Project # R25 and Roadway Project #R29). As suggested during the previous joint Commission meetings on November 7, 2011 and November 29, 2011, joint meetings of the Planning and Transportation Commissions, we hoped that your recommendation to Council concerning any future extension of Washington Street could include adoption of Roadway Project **#R29** (Washington Street extension to Benson Way) **as**

an alternative to Roadway Project #R25 (Washington Street extension to Tolman Creek Road). See: attached Exhibit "A" (Summary of Project # R-25 and Project # R-29).

Our hope is that the joint Commission members will recommend adoption of the proposed future Washington Street Extension reflected in Project #R-29, and abandon the alternative Washington Street Extension through IPCO's property to Tolman Creek Road (Project # R-25). See attached Exhibit "A".

First, Tolman Creek Road is a one-lane collector street which is already overburdened by traffic.

Second, the proposed Washington Street Extension to Tolman Creek Road is clearly depicted in the Report (Project # R25) as bisecting IPCO's property with a new "Neighborhood Collector Commercial" street, with a Right-of-Way width being taken from IPCO in a 57' to 63' wide swath, for the entire length of the proposed R25 Washington Street extension.

Third, A few years ago IPCO paid roughly \$50,000 for its share of the LID improvements to Tolman Creek Road. During that time, IPCO also committed substantial additional investment by "stubbing out" various utilities for future development of IPCO's property, as directed by City officials at the time.

Fourth, IPCO's property would in no way be benefitted by the proposed new public street from Washington Street to Tolman Creek Road, which is depicted on attached **Exhibit "A"** as bisecting IPCO's property for its entire width. Again, IPCO already paid a substantial amount for the LID improvements to Tolman Creek Road, completed just a few years ago. These improvements were designed to accommodate full build-out of IPCO's property.

Fifth, IPCO is extremely concerned about the effect of "condemnation blight" on the value and marketability of its property (described in the

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City of Ashland Planning and Transportation Commissions
January 26, 2012

Endnote to my letter previously submitted at the November 7, 2011 meeting).

Lastly, IPCO again respectfully voices its strenuous objection to the proposed Washington Street Extension to Tolman Creek Road (Project # R25), and requests the Joint Commission instead recommend the Benson Way extension alternative for Washington Street (Project # R29).

Sincerely,

DAVIS, HEARN, BRIDGES & ANDERSON, P.C.



CHRISTIAN E. HEARN

chearn@davishearn.com

Enclosures: ***Exhibit "A": Attachment "A", Pg. 24, Project # R25;
and Pg. 28, Project # R29.***

And,

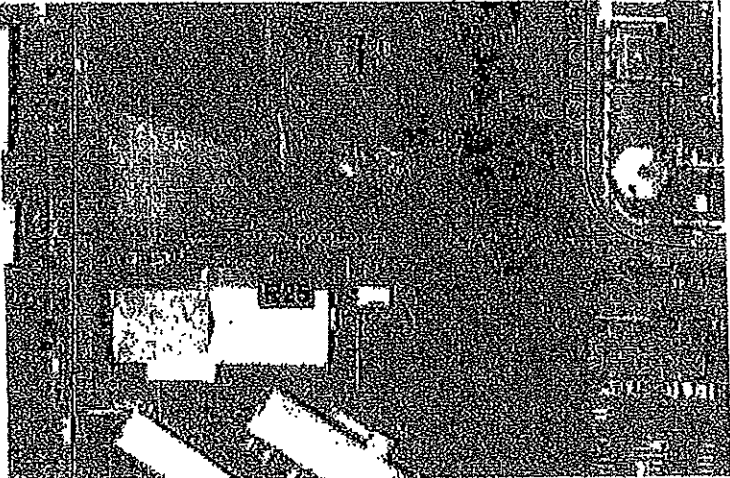
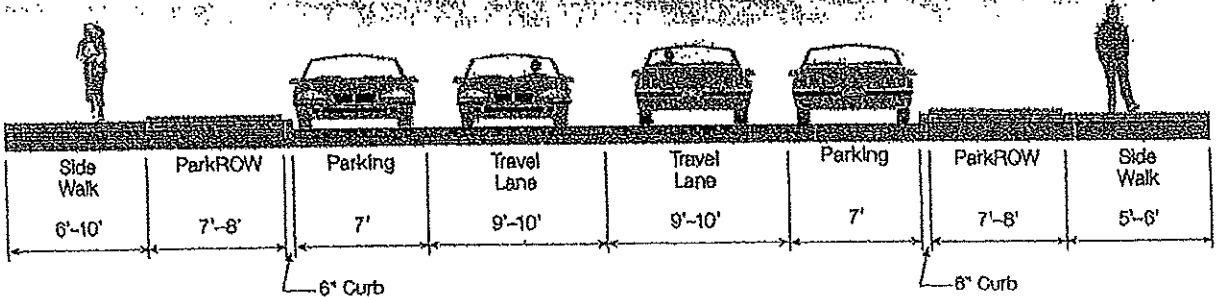
Exhibit "B": IPCO Property

EXHIBIT "C": IPCO SITE PLAN

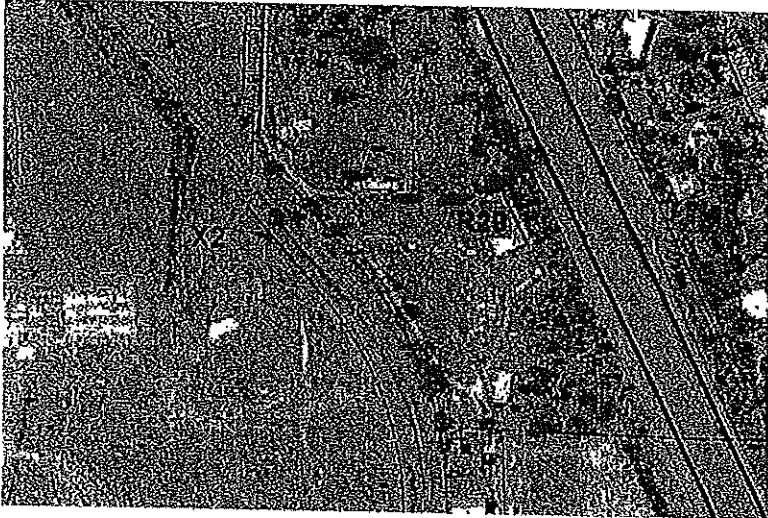
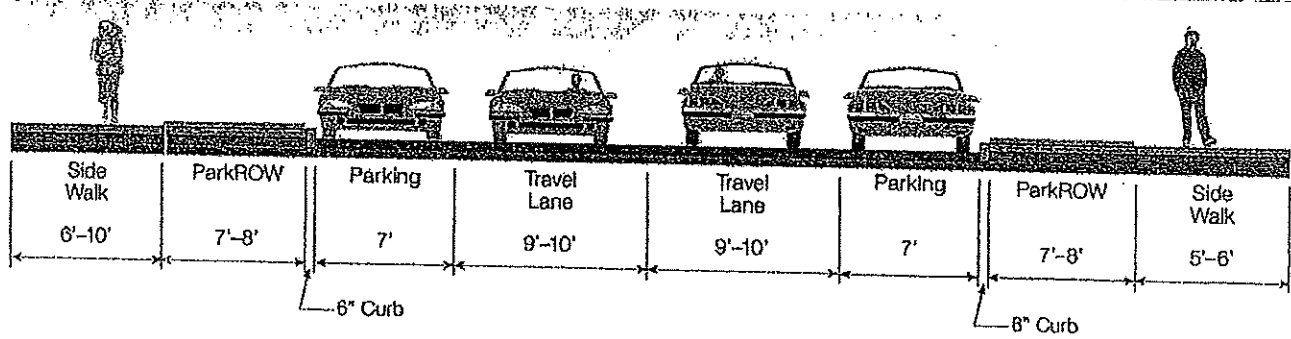
cc: Clients

Attachment A
Project Prospectus Sheets
Intersection and Roadway Projects

Exhibit ^{" "}A
Page 1 of 3



Project #: R25		Washington Street Extension to Tolman Creek Road			
Description: Extend Washington Street to Tolman Creek Road. Coordinate project with IAMP Exit 14 Access Management on Ashland Street (OR 66) and surrounding development. Right-of-way costs are not included in the cost estimate.					
Category: Roadway	Functional Classification: Neighborhood Collector	Time Frame: Development & Access Management Driven	Engineering and Construction Cost: \$1,015,000		
Project Goals Met:					
Create a Green Template <input type="checkbox"/>	Improve Safety <input type="checkbox"/>	Facilitate Economic Growth and Maintain Small Town Character <input checked="" type="checkbox"/>	Balance Mobility and Access <input checked="" type="checkbox"/>		
Project Location:					
Project Image:					
Neighborhood Collector Commercial (Parallel Parking on Both Sides) ROW 57' - 63'					

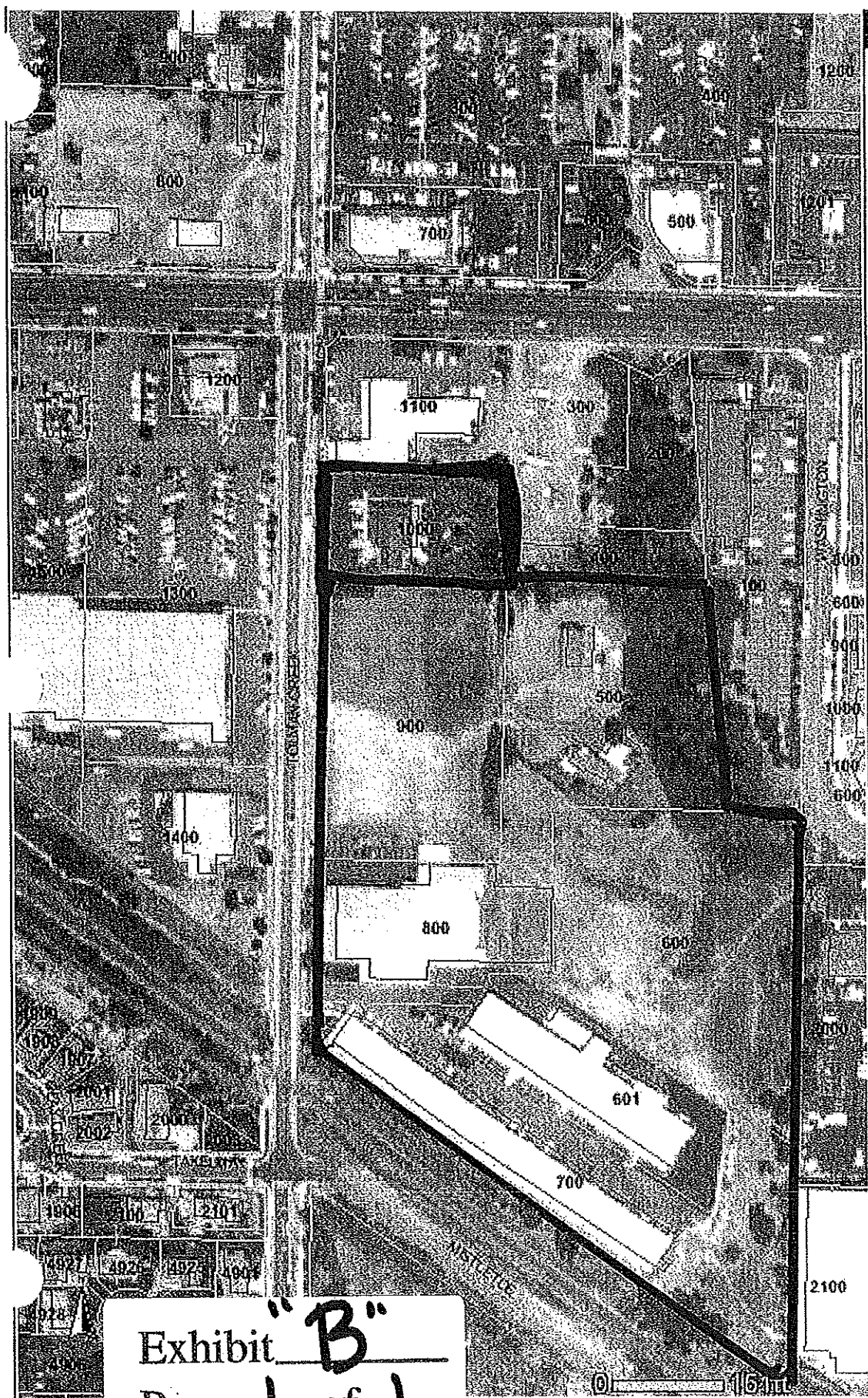
"A"
Exhibit
Page 2 of 3

Project #: R29	Washington Street Extension to Benson Way		
Description: Extend Washington Street to Benson Way. Right-of-way costs are not included in the cost estimate.			
Category: Roadway	Functional Classification: Neighborhood Collector	Time Frame: Development Driven	Engineering and Construction Cost: \$1,153,000
Project Goals Met:			
Create a Green Template <input type="checkbox"/>	Improve Safety <input type="checkbox"/>	Facilltate Economic Growth and Maintain Small Town Character <input checked="" type="checkbox"/>	Balance Mobility and Access <input checked="" type="checkbox"/>
Project Location:			
Project Image:			
Neighborhood Collector Commercial (Parallel Parking on Both Sides) ROW 57' - 63'			

Map Maker Application

Front Counter Legend

-  Highlighted Feature
-  Tax Lot Outlines
-  Tax Lot Numbers
-  Buildings
-  Countywide Color Aerial Photos 2005



IPCO
PROPERTY



This map is based on a digital database compiled by Jackson County from a variety of sources. Jackson County cannot accept responsibility for errors, omissions, or positional accuracy. There are no warranties, expressed or implied.

Created with MapMaker Map created on 7/26/2011 5:31:03 PM using web.jacksoncounty.org

Exhibit "B"
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