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TECHNICAL MEMORANDUM #1

Pendleton IAMPs: Exit 210

IAMP Definition and Background

Date:	December 10, 2019	Project #: 24043
To:	Technical Advisory Committee, Citizen Advisory Committee	
From:	Nick Foster, AICP, RSP, Matt Hughart, AICP, and Mark Heisinger	

The purpose of this memorandum is to provide an overview of the Interchange Area Management Plan (IAMP) for Exit 210 in Pendleton. Specifically, this memorandum describes the project purpose and background. It also proposes goals, objectives, evaluation criteria, and the study area.

BACKGROUND

The following sections describe the purpose and intent of the IAMP, the IAMP's problem statement, the function of the interchange, and the proposed study area. Further information on previous studies and relevant policies and plans can be found in Attachment "A" to this memorandum.

Purpose and Intent

The I-84 Exit 210 IAMP is intended to be a strategic transportation plan to protect the long-term function of the interchange as the area around it develops. Potential development near the interchange is a primary driving force behind the need for this study. The IAMP will identify land use management strategies, short- and long-term transportation improvements, access management goals, and strategies to fund identified improvements. The intent is a planning effort that results in policies, ordinances, and other provisions that will be adopted into the Pendleton Transportation System Plan (TSP). The IAMP will also be adopted by the Oregon Transportation Commission (OTC) as an amendment to the Oregon Highway Plan (OHP).

Problem Statement

The City of Pendleton's Comprehensive Plan designates the undeveloped area northeast of the interchange as the East Side Mixed-use Opportunity Area (MOA, Reference 1). Development in this area is likely to include a mixture of commercial and residential uses. Access to this area is currently limited. The roads that currently stub into this area are either steep and narrow residential streets (i.e., 6th Street through 11th Street) or are located in close proximity to the I-84 westbound ramp terminal on

OR 11 (i.e., Kirk Avenue, which is less than 250 feet from the I-84 Westbound ramp terminal). This plan will need to evaluate access strategies to the East Side MOA.

View from Kirk Avenue Looking at I-84 WB Ramps

The Nye Avenue corridor on the south side of I-84 also has additional development potential. It is zoned for Tourist and Service Commercial uses. Additional development in this area within the City's Urban Growth Boundary (UGB) is likely.

Finally, similar to Kirk Avenue, Nye Avenue is located less than 250 feet from the I-84 eastbound ramp terminal. Relocating this intersection would be a challenge given existing development and topographical constraints.

Interchange Function

The I-84 Exit 210 interchange is located on the east side of Pendleton. It provides access on the south side of I-84 to multiple highway-oriented uses (e.g., hotels, gas stations, and restaurants) and to residential areas via Nye Avenue. On the north side of I-84, the interchange provides access to OR 11 (Oregon-Washington Highway No. 8). OR 11 is classified by the Oregon Department of Transportation (ODOT) as a Statewide-level Highway (Reference 2). It provides access to downtown Pendleton and is a signed I-84 exit to communities north of Pendleton including (e.g., Milton-Freewater, Athena, and Adams in Oregon, and Walla Walla, Washington).

Interchange Management Study Area (IMSA)

To provide a comprehensive study and to achieve effective results, the IMSA includes developable and re-developable properties and major roadways that could significantly affect the function of the interchange over the next 20 years. At a minimum, the IMSA includes properties, as well as all access points within ½-mile from the existing interchange as defined by the IAMP Guidelines. Figure 1 presents the draft IMSA map.

Operations and Access Study Area

The Operations and Access Study Area includes all access points and intersections within the IMSA and encompasses those key intersections that have the potential to affect traffic operations in the interchange area over the 20-year planning period. These study boundaries identify the area for which operational analysis will be completed and the area that will be considered for the Access Management Plan (although access spacing requirements from the interchange are only ¼-mile). The study intersections include:

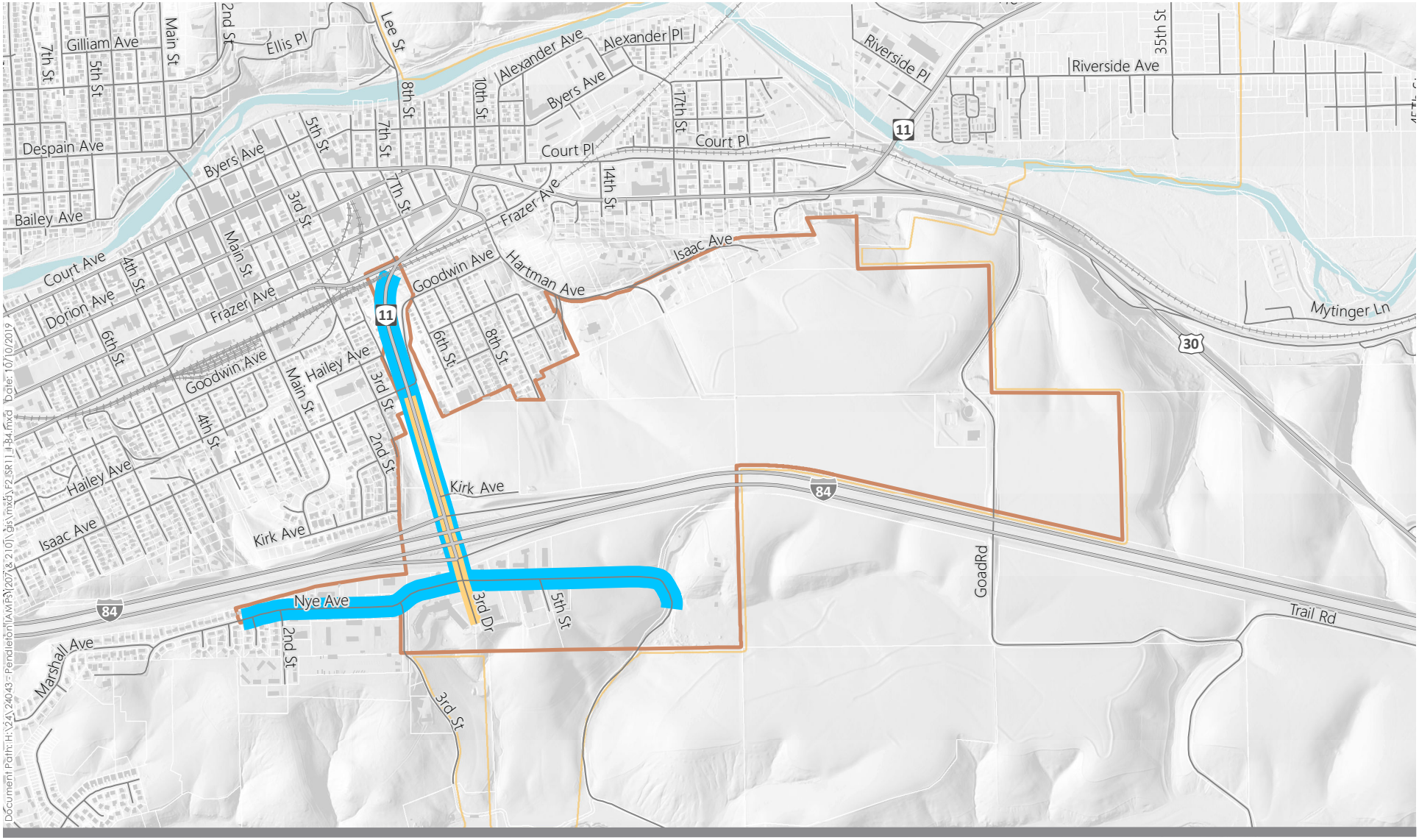

Figure 2

Interchange Management Study Area
Exit 210

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- I-84 Westbound Ramp Terminal/OR 11
- I-84 Eastbound Ramp Terminal/OR 11
- Kirk Avenue/OR 11
- Isaac Avenue/OR 11
- Nye Avenue/3rd Drive

Land Use Study Area

The Land Use Study Area includes all properties located roughly within the Operations and Access Study Area and beyond in order to incorporate developable and re-developable properties that have the potential to significantly affect the interchange functions. Properties identified with potential to affect the interchange include those that are expected to use the interchange as the primary connection to I-84. The Pendleton urban growth boundary and topographical constraints in the area limit the number of vacant parcels that are considered developable.

GOAL, OBJECTIVES, AND EVALUATION CRITERIA

The primary goal of the IAMP process is to protect the function of the interchange for the next 20 years while accounting for changes in land use and traffic patterns. As stated in Policy 3C of the 1999 Oregon Highway Plan, "it is the policy of the State of Oregon to plan for and manage grade-separated interchange areas to ensure safe and efficient operation between connecting roadways." To this end, the following draft objectives have been developed based on this goal and the scope of work for this project:

1. Consider the surrounding contextual land use and roadway network;
2. Provide for efficient connectivity, right-of-way, and access control in the analysis area of the interchange;
3. Refine and prioritize improvements needed to maintain acceptable traffic operations at the interchange while providing safe access to adjacent land uses;
4. Provide plans for improved local street connectivity in the Project area while limiting cul-de-sacs or other non-connected streets;
5. Evaluate existing and potential land use designations, intensities, conditions, and actions that could have favorable effect on the facility or an adverse effect on the facility;
6. Include implementation policies to be adopted into the City and County comprehensive plans, transportation system plans, interchange access standards, and zoning ordinances, as appropriate; and
7. Develop alternatives that consider the surrounding topographical context, environmental impacts, construction cost, and potential phasing strategies.

These objectives will be reviewed with members of the study's Technical Advisory Committee (TAC) and Citizen Advisory Committee (CAC) before they are finalized.

Draft Evaluation Criteria

Based on the goal and objectives, the following draft evaluation criteria were assembled so that potential interchange improvement concepts would be evaluated for consistency with the overall intent of the project. The eight evaluation criteria are outlined in Table 1.

Table 1 Draft Evaluation Criteria

Evaluation Criteria	Description	Relationship to Objectives
Transportation	• Safety • Mobility • Freight mobility	2, 3, 4
Land Use/Economic Development	• Right-of-way impacts • Compatibility with land use • Growth accommodation	1, 2, 3, 5
Environmental	• Environmental impacts	7
Accessibility	• Future access to undeveloped properties • Access spacing requirements	1, 2, 3, 4
Cost	• Cost relative to other improvement concepts	7
Implementation	• Impacts to existing and proposed developments • Topographical challenges • Ability to construct in phases • Fundability	6, 7

NEXT STEPS

This memorandum will be reviewed with the project's TAC and CAC and revised based on their feedback.

REFERENCES

1. City of Pendleton. *Comprehensive Plan Land Use Map*. April 2013.
2. Oregon Department of Transportation. *TransGIS.* https://gis.odot.state.or.us/transgis/. Accessed September 16, 2019.

Attachment A Policy Review

MEMORANDUM

Technical Memorandum #1 Appendix: Policy Review

Task 3.3

Pendleton Interchange Area Management Plans: Exits 207 & 210

DATE	October 17, 2019
TO	Matt Hughart and Nick Foster, Kittelson & Associates
FROM	Darci Rudzinski, Shayna Rehberg, and Emma Porricolo, Angelo Planning Group
CC	Project Management Team

OVERVIEW

Pursuant to the scope of work (Task 3.3), this memorandum presents a review of existing plans, regulations, and policies that affect transportation planning in the study area for the Pendleton Interchange Area Management Plans: Exits 207 & 210 (Pendleton IAMPs). The review explains the relationship between the documents and planning in this area, identifying key issues to track through the IAMP development process.

Documents in this review establish transportation-related standards, targets, and guidelines as well as transportation improvements with which the IAMP shall coordinate and be consistent. Other documents in this review – such as the Pendleton Transportation System Plan (TSP) and Unified Development Code (UDC) – may be subject to future recommended amendments in order to implement the IAMP. Once the IAMPs and implementing ordinances are completed, it is expected that the City will adopt key elements of the IAMP as a refinement to the Pendleton TSP before the IAMP is considered by the Oregon Transportation Commission (OTC) for adoption. Upon adoption by the OTC, the IAMP becomes an amendment to the Oregon Highway Plan (OHP).

Table 1 provides a list of the documents reviewed in this memorandum, the page in the memo where the applicable information can be found, and a summary of the relevance each document has to the Pendleton IAMPs and the Interchange Management Study Areas (IMSAs) specifically.

Table 1. Summary of Documents Reviewed and Project Relevance

Documents	Project Relevance	Page
FEDERAL AND STATE DOCUMENTS		
FHWA Access to Interstate System Policy	The Oregon Department of Transportation (ODOT) is responsible for the submission of access modification requests to the designated FHWA Division office for review. The IAMPs must include all information required for submission under this policy.	5
2018-2021 Statewide Transportation Improvement Program	A result of the IAMP planning process may be recommended projects for inclusion in a future cycle of STIP funding. There is no guarantee that the projects will be included in the next version or future STIPs. Available statewide funding for transit-related improvements includes the Statewide Transportation Improvement Fund (STIF).	5
ODOT Title VI Guidance	Development of the IAMPs will address Title VI and Environmental Justice populations to ensure the planning project complies with related federal requirements. Title VI and Environmental Justice populations have been identified as part of demographic analysis performed for the project; project alternatives will be evaluated for impacts on these populations.	6
ODOT IAMP Guidelines	The project team will use the IAMP Guidelines as a tool during development of the IAMPs, specifically considering the appropriateness of implementation measures identified in the guidelines.	7
Oregon Transportation Plan	The Pendleton IAMPs will seek to maximize performance of the existing transportation system through, for example, the use of technology and system management before considering larger and costlier improvements at the interchanges.	8
Transportation Planning Rule (OAR 660-012)	While OAR 734-051 regulates access management and not the TPR (OAR 660-012), the TPR provides the connection between local development codes and access management, coordinated land use review procedures, and other standards, allowances, and requirements to protect road operations and safety, as well as provide for non-motorized modes of transportation. Planned improvements within the IMSA on local roadways will need to be consistent with Pendleton's adopted transportation requirements. Recommended IAMP implementation measures may entail local code amendments to ensure TPR provisions as well as IAMP recommendations are captured in the code.	8
Access Management Rule (OAR 734-051)	The Pendleton IAMPs will meet compliance with spacing standards in OAR 734-051 and their development will need to be consistent with the applicable criteria established for facility plans and project delivery in the Rule. To be consistent with the direction provided in Senate Bill 408, the development and evaluation of alternatives will acknowledge the impacts and benefits of property access, as measured by adopted local land use designations (allowed uses) and economic development objectives of the property owners. The IAMPs' access management plan should "include level of detail sufficient to inform affected real property owners of the potential for the	9

	modification, relocation or closure of existing private approaches within the area (§4(3)(c)).” The location of local streets that intersect with the state highway system in the vicinity of the subject interchanges will be discussed with the City during the existing conditions phase of the project.	
Oregon Highway Plan	The Pendleton IAMPs will be adopted as an amendment to the OHP; therefore, they must align will all relevant policies summarized above.	12
ODOT Highway Design Manual	The IAMP alternatives will be developed to be consistent with the applicable HDM Standards for interchanges and state highways. Any proposed bicycle or pedestrian improvements associated with the preferred alternatives will also need to be consistent with the HDM.	16
Oregon Bicycle Bill	Facilities for pedestrians and cyclists will be required where plan recommendations include new or reconstructed roadway associated with the state highways or interchange design.	17
Oregon Bicycle and Pedestrian Plan	The IAMP will consider State bicycle and pedestrian goals and strategies through this planning project and their implementation avenues.	18
Oregon State Rail Plan	The planning process will consider the needs of freight movement by rail within the project area through the development of the IAMPs because the presence of rail lines through Exit 207 IMSA.	19
Oregon Freight Plan	Maintaining and enhancing efficiency of the truck and freight system in the study area will be an integrated part of the IAMPs.	19
Oregon Aviation Plan	The Pendleton IAMPs will take into account land use and growth at the Eastern Oregon Regional Airport and how improvements at Exit 207 may impact access and economic development.	20
Oregon Transportation Safety Action Plan	Safety factors will be reflected in IAMP Goals and Objectives and the assessment of project alternatives.	21
Oregon Public Transportation Plan	The IAMP process will coordinate with Kayak, the regional public transit agency, and the City’s transit program to ensure that planning outcomes are consistent with transit planning. A representative from Kayak will be invited to participate on the project advisory committee and will receive copies of each deliverable for review and comment to ensure coordination between the IAMP planning process and outcomes and regional transit operations and long-range planning.	22
LOCAL DOCUMENTS		
Pendleton Comprehensive Plan	The IAMPs will need to be consistent with Comprehensive Plan policies, either existing or as proposed to be modified. Furthermore, the IAMPs will be adopted as an amendment to the City TSP, the Transportation Element of the City’s Comprehensive Plan.	23
Pendleton Unified Development Code	As the IAMP process progresses and recommendations are formed, the UDC will be evaluated to assess if amendments are needed to implement the recommendations of the IAMP.	24

Pendleton Transportation System Plan	The projects recommended in the TSP, either proposed or already constructed within the study area, will be considered in the development of the IAMPs. The IAMPs will be adopted as an amendment to the TSP and therefore will need to be found, or made, consistent with standards and policies in the TSP.	26
Pendleton Capital Improvement Plan	Improvements recommended in the Pendleton IAMPs will be coordinated with projects programmed in the existing CIP and will be incorporated in the future CIP. If there is the potential for coordination with a CIP project that is partially unfunded or funding is currently undetermined, then the IAMP may identify where the opportunity exists to help fund the CIP project.	27
Pendleton Standard Specifications	The Standard Specifications document can guide local street improvements in the IAMP study areas. The current engineering design specifications will be referenced for consistency with the recommendations and improvements identified during the IAMP process. Modifications or exceptions to the specifications may be needed to ensure consistency between them and the IAMPs.	27
Eastern Oregon Regional Airport Master Plan	The current operations and planned expansions of the Eastern Oregon Regional Airport at Pendleton and the Airport Industrial Park will be considered in the development of the IAMPs, particularly with respect to potential impacts to Airport Road and its access to the interchange.	28
Pendleton Active Transportation and Transit Plan	City active transportation/transit objectives and planned projects will be considered in the development of the IAMPs.	29
Pendleton Safe Routes to School Program	Murray Junior High School lies to the west of the Exit 210 IMSA. Evaluation of possible transportation solutions will need to consider the City's SRTS process and outcomes, including recommendations related to non-vehicular access to this school and improvements to enhance the safety of bicycles and pedestrians.	30
Morrow County/Umatilla County Transit Development Strategy	The proposed improvements through the IAMP process will consider the transit facility and services proposed in the plan.	31

FEDERAL AND STATE DOCUMENTS

Federal Highway Administration (FHWA) Access to Interstate System Policy (2017)

The Federal Highway Administration's (FHWA) policy established the federal requirements for new or improved access to the interstate system. The policy states the following:

> *It is in the national interest to preserve and enhance the Interstate System to meet the needs of the 21st Century by assuring that it provides the highest level of service in terms of safety and mobility. Full control of access along the Interstate mainline and ramps, along with control of access on the crossroad at interchanges, is critical to providing such service. Therefore, the Federal Highway Administration's (FHWA) decision to approve new or revised access points to the Interstate System under Title 23, United States Code (U.S.C.), Section 111, must be supported by substantiated information justifying and documenting that decision. The FHWA's decision to approve a request is dependent on the proposal satisfying and documenting the following requirements.*
>
> *1) An operational and safety analysis that have proven the proposed access changes does not have "a significant adverse impact on the safety and operation of the Interstate facility" or connected local street network. The area of analysis should at minimum expand from the interstate to the to the nearest major intersection on either side of proposed change in access.*

2) The proposed access connects to a public road only and will provide for all traffic movements. The report should demonstrate the proposed change meets the current standards of 23 CFR 625.2(a), 625.4(a)(2), and 655.603(d) and mitigation proposed to compensate for the missing movements, including wayfinding signage, impacts on local intersections, mitigation of driver expectation leading to wrong-way movements on ramps, etc.

Project Relevance: The Oregon Department of Transportation (ODOT) is responsible for the submission of access modification requests to the designated FHWA Division office for review. The IAMPs must include all information required for submission under this policy.

2018–2021 Statewide Transportation Improvement Program

The State Transportation Improvement Program (STIP) is the programming and funding document for transportation projects and programs statewide. The projects and programs undergo a selection process managed by ODOT Regions or ODOT central offices. The document covers a period of four

years and is updated every two years. There are no current active STIP (2018-2021) projects proposed within the Pendleton IAMPs study area.[1]

Statewide Transportation Improvement Fund (STIF)

House Bill 2017, Keep Oregon Moving, required that starting in 2019 a new state payroll tax of one-tenth of 1 percent would be enacted to fund public transportation improvements around the state. The new revenue is allocated under the Statewide Transportation Improvement Fund Program (STIF), with a majority of the funds allocated to qualified local entities. The Oregon Transportation Commission awarded over $19 million in Statewide Transportation Improvement Fund (STIF) Discretionary & Intercommunity Program and Statewide Transit Network Program funding during the 2019 grant cycle. Umatilla County will receive STIF funds annually and plans to allocated funds to transit providers across the county, including Kayak Public Transportation System and City of Pendleton Let'er Bus Fixed-Route service.

Project Relevance: A result of the IAMP planning process may be recommended projects for inclusion in a future cycle of STIP funding. There is no guarantee that the projects will be included in the next version or future STIPs. Available statewide funding for transit-related improvements includes the Statewide Transportation Improvement Fund (STIF).

ODOT Title VI Guidance

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs that receive federal funding, including ODOT, MPO, and local government transportation planning, design, construction, and operations activities. Related statutes and policies prohibit discrimination on other bases, such as Executive Order 12898 (Environmental Justice), which requires that minority and low-income populations not be disproportionally subjected to impacts of proposed projects.

Title VI Guidance for Transportation Planning was released by the ODOT Transportation Development Division (TDD) in July 2009. It provides direction to local governments, MPOs, and ODOT staff in annual reporting to the FHWA and Federal Transit Administration (FTA) regarding the compliance of planning, design, and construction activities with Title VI. The guide provides direction for planning activities in particular, with an emphasis on activities related to identifying Title VI populations in planning study areas, developing and conducting targeted outreach to these populations, and documenting activities and findings. The guide essentially provides checklists for local governments, MPOs, and ODOT Region Planning Project Managers, Region Planning Managers,

[1] Note that a draft 2021-2024 STIP will likely be adopted by the OTC before the end of the planning effort. Proposed projects that are within the IMSA will be considered as future solutions for the interchange are developed and evaluated.

TDD Planning Staff, and the Title VI Program Manager for documenting and reporting- reporting that is rolled up into the annual Title VI Accomplishment Report.

Project Relevance: Development of the IAMPs will address Title VI and Environmental Justice populations to ensure the planning project complies with related federal requirements. Title VI and Environmental Justice populations have been identified as part of demographic analysis performed for the project; project alternatives will be evaluated for impacts on these populations.[2]

ODOT Interchange Area Management Plan Guidelines (2013)

The IAMP Guidelines provide guidance in the preparation of IAMPs. The guidelines include background regarding the purpose and regulatory significance of IAMPs and address the following:

- IAMP contents and level of analysis
- Timing
- IAMP process
- Relationship of ODOT and local governments
- Relationship to NEPA
- Schedule, cost and funding.

As part of the "IAMP Process," the guidelines establish local development code, deed restrictions, funding mechanisms, traffic/transportation mechanisms, and access management as IAMP implementation measures. The guidelines identify policy statements, concurrency ordinances, trip capacity/allocation ordinances, trip budgets, overlay districts, and design review and performance standards as specific implementation measures to be pursued through potential local development code amendments.

The 2013 update retained much of the original material in the guidelines and added some new information, including differentiation of access management plans and strategies and expanded explanations related to coordination of IAMPs with project development (NEPA).

Project Relevance: The project team will use the IAMP Guidelines as a tool during development of the IAMPs, specifically considering the appropriateness of implementation measures identified in the guidelines.

[2] See Technical Memorandum #2, Existing Conditions.

Oregon Transportation Plan (2006)

The Oregon Transportation Plan (OTP) is a comprehensive plan that addresses the future transportation needs of the State of Oregon through the year 2030. The primary function of the OTP is to establish goals, policies, strategies and initiatives that guide the development of the State's transportation modal plans, such as the OHP and Oregon Bike and Pedestrian Plan.

The OTP emphasizes the following key initiatives for implementation of the OTP:

- Maintaining and maximizing the assets in place
- Optimizing the performance of the existing system through technology
- Integrating transportation, land use, economic development and the environment
- Integrating the transportation system across jurisdictions, ownerships and modes
- Creating sustainable funding
- Investing in strategic capacity enhancements

Project Relevance: The Pendleton IAMPs will seek to maximize performance of the existing transportation system through, for example, the use of technology and system management before considering larger and costlier improvements at the interchanges.

Transportation Planning Rule (OAR 660-012)

The Transportation Planning Rule (TPR) implements Goal 12 (Transportation) of the statewide planning goals. The TPR contains numerous requirements governing transportation planning and project development. The TPR provides the connection between local development codes and access management, coordinated land use review procedures, and other standards, allowances, and requirements to protect road operations and safety. Recommended implementation measures for the Pendleton IAMPs may entail county code amendments to ensure TPR provisions as well as IAMP recommendations are captured in the code.

Section -0045 This section requires each local government to amend its land use regulations to implement its TSP. It also requires local government to adopt land use or subdivision ordinance regulations consistent with applicable federal and state requirements "to protect transportation facilities, corridors and sites for their identified functions." Local governments also must adopt land use or subdivision regulations for urban areas that provide for safe and convenient pedestrian, bicycle, and vehicular circulation consistent with adopted access management standards and street functional classification.

Local compliance with -0045 provisions is achieved through a variety of measures, including access control measures, standards to protect future operations of roads, and expanded notice requirements and coordinated review procedures for land use applications. Local development

codes should also include a process to apply conditions of approval to development proposals, and regulations ensuring that amendments to land use designations, densities, and design standards are consistent with the functions, capacities, and performance standards of facilities identified in the TSP.

The TPR does not regulate access management. ODOT adopted OAR 734-051 to address access management and this planning project and outcomes will need to be consistent with the Access Management Rule. Requirements include reviewing existing access points within at least one-quarter mile of interchange ramps. See the review of OAR 734-051 in the next section for a discussion of these access management rules.

Section -0060 The 2012 TPR revisions resulted in new language in Section -0060 that allows a local government to exempt a zone change from the "significant effect" determination if the proposed zoning is consistent with the comprehensive plan map designation and the TSP.

Section -0070 This section details the process and requirements for transportation facilities and improvements on rural lands that do not meet the requirements of OAR 660-012-0065 (reviewed above), which require an exception.

Project Relevance: While OAR 734-051 regulates access management and not the TPR (OAR 660-012), the TPR provides the connection between local development codes and access management, coordinated land use review procedures, and other standards, allowances, and requirements to protect road operations and safety, as well as provide for non-motorized modes of transportation. Planned improvements within the IMSA on local roadways will need to be consistent with Pendleton's adopted transportation requirements. Recommended IAMP implementation measures may entail local code amendments to ensure TPR provisions as well as IAMP recommendations are captured in the code.

Access Management Rule (OAR 734-051)

OAR 734-051 defines the State's role in managing access to highway facilities in order to maintain functional use and safety and to preserve public investment. The rule includes spacing standards for varying types of state roadways and criteria for granting right of access and approach locations onto state highway facilities.

Amendments to OAR 734-051 were adopted in early 2012 based on passage of Senate Bill 1024 and Senate Bill 264 in the 2010 and 2011 Oregon Legislature respectively. The amendments were intended to allow more consideration for economic development when developing and implementing access management rules and involved changes to how ODOT deals with approach road spacing, highway improvement requirements with development, and traffic impact analyses requirements for approach road permits.

Senate Bill 408, which passed in the 2013 legislative session and became effective January 1, 2014, addressed three priorities: existing approaches (private driveways) without ODOT's written permission; access management in highway facility plans; and access management in highway project delivery.[3] The legislation provides new requirements for access management in the development of highway facility plans such as interchange area management plans and corridor plans, and requires collaboration with local governments in determining the location of local roads that intersect highways in the planning area. The legislation also directs ODOT to develop an access management strategy for each highway modernization or improvement project. ODOT must develop key principles for each facility plan, which will be used to evaluate how abutting properties may retain or obtain access to the state highway during and after plan implementation. In developing the key principles, the department must also develop a methodology to weigh the benefits of a highway improvement to public safety and mobility against the locally adopted TSP and land uses permitted in the local comprehensive plan, as well as the economic development objectives of affected real property owners who require access to the state highway. If a facility plan identifies the need to modify, relocate or close existing private approaches, the plan must include key principles for managing access to the state highway and a timeline for plan implementation. Each facility plan also must document that there was collaborative discussion and agreement between the department and the affected city regarding the location of city streets that intersect a state highway within the study area.

OAR 734-051-4020 (Standards and Criteria for Approval of Private Approaches)

New spacing standards were established in 2012 for new or modified approaches to statewide highways[4] but spacing standards related to interchanges (spacing of tapers between interchanges, spacing between ramp tapers and approaches or intersections with left-turns) were not amended.[5] The amendments also allow access management plans (AMPs) and IAMPs to establish spacing standards that may take precedence over the highway/approach spacing standards in the rule.[6]

Interchange improvements that are proposed in the IAMPs will need to meet or improve, "by moving in the direction of," the access management spacing standards by means of an access management strategy, plan, or mitigation proposal.[7]

[3] Senate Bill 408 resulted in the adoption of two permanent rules by the OTC: 734-051-1065 Restriction of Turning Movements for Existing Approaches, and 734-051-3015 Presumption of Written Permission for an Existing Private Connection. Additionally, fifteen (15) existing permanent rules were amended, and five previously adopted temporary rules were repealed.

[4] Tables 3-6 in OAR 734-051

[5] Tables 7-10 and Figures 1-4 in OAR 734-051

[6] Pursuant to OAR 734-051-4020(8)(b)(C), spacing standards in AMPs and IAMPS may take precedence only over spacing standards in Tables 3-5 of OAR 734-051.

[7] OAR 734-051-1070(2), (3), and (4)

OAR 734-051-5120 (Access Management in Project Delivery)

Section -5120 of OAR 734-051 requires ODOT to develop an access management strategy during project delivery for modernization and highway improvement projects in the STIP. ODOT must collaborate with cities, counties, and owners of property adjacent to the highway to develop the access management strategy. The strategy must be consistent with the OTP, the OHP, and other modal plans adopted by the OTC, including Bicycle and Pedestrian Plan, Freight Plan, Highway Plan, Public Transportation Plan, and State Rail Plan.

The access management strategy must include methodology that balances the economic development objectives of properties abutting the state highway with the transportation safety, access management objectives, and mobility of state highways, while also being consistent with local transportation system plans and the local comprehensive plans acknowledged under ORS Chapter 197.

Section -5120 provides a detailed outline for the required contents of the access management strategy. Both Section -5120 for Access Management in Project Delivery and Section -7010 Access Management in Highway Facility Plans, described below will apply to the Exit 207 and Exit 210 Interchanges. The strategies required for access management in -5120 and -7010 are the same and reflect the guidance in Senate Bill 408.

OAR 734-051-7010 (Access Management in Highway Facility Plans)

Section -7010 of OAR 734-051 identifies ODOT's responsibilities to address access management during the development of highway facility plans (access management plans and/or IAMPs) for particular sections of a state highway. The IAMP must comply with the following, unless it can be demonstrated that a criterion is not applicable.

- For the public participation process, provide notice and include interested stakeholders in to participate in the planning process. The process must include an opportunity for affected real property owners that abut the highway to review key principals and related methodology.
- Identify the need to modify, relocate, or close one or more existing approaches and how they will retain or obtain access to the state highway during and after plan implementation.
- Balance economic development objectives with transportation safety, access management, and mobility of state highway consistent with local plans.
- Articulate key principals in sufficient detail and include anticipated timeline for implementation.
- The plan must be consistent with the agreed upon local road connections identified in the TSP or during development of the plan and consider implications to state and local roadway networks and greater transportation systems.

The section also states that the methodology may include the following factors:

- How properties abutting state highways can develop or redevelop consistent with local designations, zoning and comprehensive plan.
- The level of direct highway access needed for properties
- Effects of out of direction travel for customers to recognize differences between destination and pass-by uses
- Effect of changing existing connections and circulation
- Safety and operational implications of traffic congestions or speed
- Creation of permanent jobs in the study area
- Community support for the project
- Reduction of vehicle conflict points where possible
- Safety and operation concerns
- Safety planning tools, data, and resources

Project Relevance: The Pendleton IAMPs will meet compliance with spacing standards in OAR 734-051 and their development will need to be consistent with the applicable criteria established for facility plans and project delivery in the Rule. To be consistent with the direction provided in Senate Bill 408, the development and evaluation of alternatives will acknowledge the impacts and benefits of property access, as measured by adopted local land use designations (allowed uses) and economic development objectives of the property owners. The IAMPs' access management plan should "include level of detail sufficient to inform affected real property owners of the potential for the modification, relocation or closure of existing private approaches within the area (§4(3)(c))." The location of local streets that intersect with the state highway system in the vicinity of the subject interchanges will be discussed with the City during the existing conditions phase of the project.

Oregon Highway Plan (1999, last amended 2015)

The OHP is the modal plan of the OTP that guides ODOT's Highway Division in planning, operations, and financing. The Pendleton IAMPs are being developed by ODOT; therefore projects, policies, and regulations proposed as part of the IAMPs will comply with or move in the direction of meeting the standards and targets related to safety, access, and mobility that are established in the OHP. Ultimately, the IAMPs will need to be found consistent with the OHP and will be reviewed by the OTC for adoption. If adopted, it will be one of the many special facility plans that have amended the OHP over the years.

Policies in the OHP emphasize the need to efficiently manage the highway system to increase safety and to extend highway mobility, partner with other agencies and local governments, and use new techniques to improve road safety and mobility. These policies also link land use and transportation, set standards for highway performance and access management, and emphasize the relationship between state highways and local road, bicycle, pedestrian, transit, rail, and air systems. The following policies, in particular, are relevant to the Pendleton IAMPs, specifically to three highways located in the IAMPs study areas – Interstate 84, U.S. Route 30, and Oregon Route 11.

Policy 1A: State Highway Classification System

The OHP classifies the state highway system into four levels of importance: Interstate, Statewide, Regional, and District. ODOT uses this classification system to guide management and investment decisions regarding state highway facilities. The system guides the development of facility plans, such as the Pendleton IAMPs, as well as ODOT's review of local plan and zoning amendments, highway project selection, design and development, and facility management decisions including road approach permits. Both Interstate 84 (I-84), Oregon Route 11 (OR-11), and Highway 30 (US 30) are a part of the National Highway System (NHS). The purpose and management objectives of these highways are provided in Policy 1A, as summarized below.

- **Interstate Highways**, such as I-84, provide connections between major cities in a state, regions of the state, and other states. A secondary function in urban areas is to serve regional trips within the urban area. Their primary objective is to provide mobility and, therefore, the management objective is to provide for safe and efficient high-speed continuous-flow operation in urban and rural areas.
- **Statewide Highways**, such as OR-11, typically provide inter-urban and inter-regional mobility and provide connections to larger urban areas, ports, and major recreation areas that are not directly served by Interstate Highways. A secondary function is to provide connections for intra-urban and intra-regional trips. The management objective is to provide safe and efficient, high-speed, continuous-flow operation. In constrained and urban areas, interruptions to flow should be minimal. Inside Special Transportation Areas (STAs), local access may also be a priority, there are no STAs located in the study area. In addition to the state highway classification system, I-84 is a designated freight route as discussed under Policy 1C.
- **District Highways** are facilities of county-wide significance and function largely as county and city arterials or collectors. They provide connections and links between small urbanized areas, rural centers and urban hubs, as well as serve local access and traffic. US 30 fulfills this role in the vicinity of Exit 207.

Policy 1B: Land Use and Transportation

Policy 1B applies to all state highways. It is designed to clarify how ODOT will work with local governments and others to link land use and transportation in transportation plans, facility and corridor plans, plan amendments, access permitting and project development. Policy 1B recognizes the need to find balance between serving local communities (accessibility) and the through traveler (mobility) on state facilities. This policy recognizes the role of both the state and local governments related to the state highway system and calls for a coordinated approach to land use and transportation planning.

Policy 1C: State Highway Freight System

The primary purpose of the State Highway Freight System is to facilitate efficient and reliable interstate, intrastate, and regional truck movement through a designated freight system. This freight system is made up of the Interstate Highways and select Statewide, Regional, and District Highways and includes routes that carry significant tonnage of freight by truck and serve as the primary interstate and intrastate highway freight connection to ports, intermodal terminals, and urban areas. A primary function of the subject interchanges is to provide safe and efficient freight movements by providing free-flow movement for through traffic. I-84 has this designation and consequently higher highway mobility standards than other statewide highways. I-84 is also a designated "Reduction Review Route," where proposed activities (including those proposed in planning documents approved by a public agency) that will alter, relocate, change or realign these facilities must be reviewed for possible "Reduction of Vehicle-Carrying Capacity." Oregon Administrative Rule 731-012-0010, last revised in 2012, explains the review process and requirements.[8]

Policy 1F: Highway Mobility Policy

Policy 1F sets mobility targets for ensuring a reliable and acceptable level of mobility on the state highway system. The targets are used to assess system needs as part of long range, comprehensive planning transportation planning projects (such as these Pendleton IAMPs), during development review, and to demonstrate compliance with the TPR.

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[8] September 2013 OHP text amendments provide the following explanation: "The 2003 legislature adopted changes to Oregon Revised Statutes (ORS) 366.215. This statute identifies the Oregon Transportation Commission's authority to build and modify state highways. The statute states that that the Commission may not permanently reduce the 'vehicle-carrying capacity' of an identified freight route unless safety or access considerations require the reduction or a local government requests the reduction. In the context of this statute, 'vehicle-carrying capacity' references the vertical and horizontal clearance for larger vehicles. Depending on the size and weight of a truck, oversized vehicles are issued permits on an annual or trip specific basis.

The need to protect existing vertical and horizontal clearance is different from the mobility function of the State Highway Freight System. The designated Reduction Review Routes identify where the Department will apply the OAR 731-012-0010 review of vertical and horizontal clearance."

Significant amendments to Policy 1F were adopted at the end of 2011. The revisions were made to address concerns that state transportation policy and requirements have led to unintended consequences and inhibited economic development. Policy 1F now provides a clearer policy framework for considering measures other than volume-to-capacity (v/c) ratios for evaluating mobility performance. [9] Also as part of these amendments, v/c ratios established in Policy 1F were changed from being standards to "targets." These targets are to be used to determine significant effect pursuant to TPR Section -0060. The mobility targets for state facilities in the IAMP study area are 0.80 v/c for I-84 and 0.85 v/c for Statewide Route (not a Freight Route).

Policy 1G: Major Improvements.

This policy requires maintaining performance and improving safety on the highway system by improving efficiency and management on the existing roadway network before adding capacity. The state's highest priority is to preserve the functionality of the existing highway system. Tools that could be employed to improve the function of the existing interchanges include access management, transportation demand management, traffic operations modifications, and changes to local land use designations or development regulations.

After existing system preservation, the second priority is to make minor improvements to existing highway facilities, such as adding ramp signals, or making improvements to the local street network to minimize local trips on the state facility. The third priority is to make major roadway improvements which could, in the case of interchange improvements, include adding lanes or reconfiguring on- or off- ramps.

Policy 2B: Off-System Improvements

This policy recognizes that the state may provide financial assistance to local jurisdictions to make improvements to local transportation systems if the improvements would provide a cost-effective means of improving the operations of the state highway system. As part of this planning process, improvements to the local road system that support the planned land use designations in the vicinity of the interchanges and that will help preserve capacity and ensure the long-term efficient and effective operation of the interchanges may be identified.

Policy 3A: Classification and Spacing Standards

It is the policy of the State of Oregon to manage the location, spacing, and type of road intersections on state highways to ensure the safe and efficient operation of state highways consistent with the classification of the highways.

[9] The v/c may be the actual or projected rate of flow on a designated lane group during a specific time period (e.g., p.m. peak hour). A v/c ratio over 1.0 indicates the road or intersection is over-capacity; a v/c ratio under 1.0 indicates there is still room to accommodate additional vehicles. Definition from ODOT's *Analysis Procedures Manual*, June 2007.

Action 3A.2 calls for spacing standards to be established for state highways based on highway classification, type of area, and posted speed. Tables in OHP Appendix C present access spacing standards which consider urban and rural highway classification, traffic volumes, speed, safety, and operational needs. As shown on Table 17 in the OHP, the spacing standards for the I-84 interchange requires a distance of 1,320 feet for the following: 1) distance for first approach on the right, right in/right out only; 2) distance to start of first intersection where left turns are allowed; and 3) distance between the last right in/right out approach road and the start of the taper for the on-ramp. However, where the crossroad is a state highway the required distance may be superseded by the Access Management Spacing standards, if they are greater than the requirements.

The access management spacing standards established in the OHP are implemented by access management rules in OAR 734, Division 51, addressed earlier in this report.

Policy 3C: Interchange Access Management Areas

This policy addresses management of grade-separated interchange areas to ensure safe and efficient operation between connecting roadways. Action items include developing interchange area management plans to protect the function of existing interchanges, provide safe and efficient operations between connecting roadways, and minimize the need for major improvements. Consistent with this policy, the Pendleton IAMP planning process will include developing and analyzing alternatives for optimizing the function and capacity of the existing interchanges prior to selecting a package of improvements that will comprise a preferred alternative.

Policy 4A: Efficiency of Freight Movement

This policy emphasizes the need to maintain and improve the efficiency of freight movement on the state highway system. I-84 is a designated Freight Routes. A principal function of the interchanges is to accommodate safe and efficient freight movements by providing free-flow movements for through-traffic on the Interstate system and for traffic accessing existing (and future planned) industrial areas.

Project Relevance: The Pendleton IAMPs will be adopted as an amendment to the OHP; therefore, they must align will all relevant policies summarized above.

ODOT Highway Design Manual (2012)

The Highway Design Manual includes ODOT standards and procedures for the location and design of new construction, major reconstruction, and resurfacing, restoration or rehabilitation (3R) projects. The Highway Design Manual is used for all projects that are located on state highways. Section 9.6, Interchange Design, includes the design standards, guidelines, and processes for designing interchanges for State Highways. ODOT, through the Engineering Services Unit, and FHWA must approve the reconstruction of an interchange on the Interstate system. The proposed interchange design must be prepared on the Standard Interchange Layout Sheet by the Engineering

Services Unit or authorized representative. The approved design is then used for contract plans. Proposed modifications as a result of this planning process to the Pendleton interchanges (Exit 207 and 210) is subject to the standards in 9.6.1, Freeway Interchange Design.

The Highway Design Manual establishes ODOT standards and procedures for the location and design of new construction, major reconstruction, and resurfacing/restoration/rehabilitation projects. The manual is used for all projects that are located on state highways. Design standards for state highways are dependent on the highway's functional classification and the project type.

Chapter 6 addresses urban highway design (non-freeway), applicable to the state highways in the IMSA that are not I-84. Chapter 9 addresses grade-separated interchanges. ODOT, through the Engineering Services Unit, and FHWA must approve the reconstruction of an interchange on the Interstate system. Chapter 13 addresses bicycle and pedestrian facilities on State Highways; detailed standards for ODOT highways and other facilities are found in the Oregon Bicycle and Pedestrian Design Guide (Appendix L of the Highway Design Manual). Chapter 13 standards are applicable to state highways in the IMSAs, excluding I-84.

Project Relevance: The IAMP alternatives will be developed to be consistent with the applicable HDM Standards for interchanges and state highways. Any proposed bicycle or pedestrian improvements associated with the preferred alternatives will also need to be consistent with the HDM.

Oregon Bicycle Bill (1971)

The Oregon Bicycle Bill is codified in ORS 366.514. Pursuant to the bill, the inclusion of facilities for pedestrians and bicyclists is required on new construction or reconstruction of roads, streets, or highways. However, footpaths and trails are not required, where the following exception conditions apply:

1. Where the establishment of such paths and trails would be contrary to public safety;
2. If the cost of establishing such paths and trails would be excessively disproportionate to the need or probable use; or
3. Where sparsity of population, other available ways or other factors indicate an absence of any need for such paths and trails

ORS 366.514 requires funds received from the State Highway Fund in "reasonable amounts" be used to provide necessary footpaths and bicycle trails, including providing improvements such as curb cuts and ramps. The funds may also be used for maintenance of footpaths and trails.

Project Relevance: Facilities for pedestrians and cyclists will be required where plan recommendations include new or reconstructed roadway associated with the state highways or interchange design.

Oregon Bicycle and Pedestrian Plan (2016)

The Oregon Bicycle and Pedestrian Plan (OBPP) provides actions that will assist local jurisdictions in understanding the principals and policies that ODOT follows in providing bike and walkways along state highways. In order to reach the plan's objectives, the strategies for system design are outlined, including:

- Providing bikeway and walkway systems and integrating with other transportation systems.
- Providing a safe and accessible biking and walking environment.
- Developing educational programs that improve bicycle and pedestrian safety.

The OBPP is an element of the OTP. The plan includes nine goal areas that support the vision for "people of all ages, incomes, and abilities can access destinations in urban and rural areas on comfortable, safe, well connected biking and walking route" There are policies and strategies associated with each of the plan's nine goals. The goals are the following:

1. Accessibility and Connectivity
2. Mobility and Efficiency
3. Community and Economic Vitality
4. Equity
5. Health
6. Sustainability
7. Strategic Investment
8. Coordination, Cooperation, and Collaboration

The plan also addresses implementation measures for the plan's policies and strategies. The implementation section also identifies the state, local, and regional stakeholders' roles as "implementation avenues." The implementation avenues are as follows:

- *Planning* - The polices and strategies in the plan provide an overall framework for planning decisions, safety needs and mobility challenges addressed through planning. Considers a holistic approach to planning and considering the needs for walking and biking in the context of the entire transportation system.
- *Programming* - Strategic investment to use limited fund as efficiently as possible.
- *Design* - Design guidelines reflect consideration of various users and contexts.
- *Project Development and Delivery* - A key consideration for Plan implementation will be leveraging opportunities to institutionalize pedestrian and bicycle transportation within the project development and delivery processes. Plan strategies identify the need for developing project check lists, where explicit walking and biking needs are considered in project development or including health criteria into project development processes.

- *Maintenance* - Facility maintenance is important to the functionality and safety of existing and new facilities.

Project Relevance: The IAMP will consider State bicycle and pedestrian goals and strategies through this planning project and their implementation avenues.

Oregon State Rail Plan (2014)

The Oregon Rail Plan (ORP), another modal plan of the OTP, addresses long-term freight and passenger rail planning in Oregon. The plan provides a comprehensive assessment of the state's rail planning, freight rail, and passenger rail systems. It identifies specific policies concerning rail in the state, establishes a system of integration between freight and passenger elements into the land use and transportation planning process, and calls for cooperation between state, regional, and local jurisdictions in planning for rail.

Union Pacific provides rail service through Pendleton and the Exit 207 interchange study area. The railroad is classified as a Class I railroad and provides no passenger service.

Project Relevance: The planning process will consider the needs of freight movement by rail within the project area through the development of the IAMPs because the presence of rail lines through Exit 207 IMSA.

Oregon Freight Plan (2011, Updated 2017)

The Oregon Freight Plan (OFP) is another modal plan of the OTP and implements the state's goals, and policies related to the movement of goods and commodities. Its purpose statement is: "to improve freight connections to local, Native American, state, regional, national and global markets in order to increase trade-related jobs and income for workers and businesses." The objectives of the plan include prioritizing and facilitating investments in freight facilities (including rail, marine, air, and pipeline infrastructure) and adopting strategies to maintain and improve the freight transportation system.

To achieve the purpose statement, the OFP does the following:

- Supports identifying, prioritizing and facilitating investments in Oregon's highway, rail, marine, air and pipeline transport infrastructure to advance a safe, seamless multimodal and interconnected freight system;
- Identifies institutional and organizational barriers to an efficient and effective freight transportation system in Oregon, and develops strategies for addressing issues associated with overcoming these barriers; and
- Adopts strategies for implementation of OTP goals and policies related to the maintenance and improvement of the freight transportation system.

The plan defines a statewide strategic freight network. The Columbia River Corridor, including I-84, is designated as a strategic corridor in the OFP.

Policy and strategic direction provided in the OFP prioritizes preservation of strategic corridors as well as improvements to the supply chain achieved through coordination of freight and system management planning.

> ***Strategy 1.2****: Strive to support freight access to the Strategic Freight System. This includes proactively protecting and preserving corridors designated as strategic.*
>
> ***Action 1.2.1****. Preserve freight facilities included as part of the Strategic Freight System from changes that would significantly reduce the ability of these facilities to operate as efficient components of the freight system unless alternate facilities are identified or a safety-related need arises.*
>
> ***Strategy 2.4****: Coordinate freight improvements and system management plans on corridors comprising the Strategic Freight System with the intent to improve supply chain performance.*

Project Relevance: Maintaining and enhancing efficiency of the truck and freight system in the study area will be an integrated part of the IAMPs.

Oregon Aviation Plan (2007)

The Oregon Aviation Plan (OAP) is a modal plan of the OTP that defines policies and investment strategies for Oregon's public use aviation system for the next 20 years. The plan addresses the existing conditions, economic benefits, and jurisdictional responsibilities for the existing aviation infrastructure. The plan contains policies and recommended actions to be implemented by Oregon Department of Aviation in coordination with other state and local agencies and the Federal Aviation Administration.

The OAP categorizes airports based on functional role and service criteria. The Eastern Oregon Regional Airport at Pendleton is located near Exit 207, approximately 0.8 miles from the interchange, is considered a Category I, Commercial Service Airport. Category I airports support some level of scheduled commercial airline service in addition to supporting a full range of general aviation aircraft activities. See the overview of the Eastern Oregon Regional Airport Master Plan later in this memorandum.

Project Relevance: The Pendleton IAMPs will take into account land use and growth at the Eastern Oregon Regional Airport and how improvements at Exit 210 may impact access and economic development.

Oregon Transportation Safety Action Plan (2016)

An element of the OTP, the Oregon Transportation Safety Action Plan (OTSAP) establishes a safety agenda to guide the investments and actions of ODOT and the State for the next 20 years. As indicated in the name of the plan, the emphasis of the OTSAP is on action and implementation. Actions included in the OTSAP were chosen based on crash data and information provided by transportation safety experts. The OTSAP is guided by six long-term goals:

Goal 1- Improving safety culture,

Goal 2 - Improving infrastructure,

Goal 3 - Facilitating healthy and livable communities,

Goal 4 - Utilizing best available technologies,

Goal 5 - Collaborate and communicate, and

Goal 6 - Strategic investments.

Each of the six major goals include several policies and strategies. Relevant policies related to the Pendleton IAMPs include the following:

- Policy 2.2. - Continually improve and implement design and analysis techniques for safety-related decision-making in transportation planning, programming, design, construction, operations and maintenance for all modes.
- Policy 2.3. - Plan, design, construct, operate, and maintain the transportation system to achieve healthy and livable communities and eliminate fatalities and serious injuries for all modes.
- Policy 4.1. - Actively monitor technological advances and plan, design, maintain, and operate the system in a way that takes full advantage of opportunities to use technology to eliminate fatalities and serious injuries.
- Policy 6.1. - Allocate infrastructure safety funds strategically, considering all modes, to maximize total safety benefits.

The action plan includes emphasis areas as a framework for near-term (5 year) components of the plan. Emphasis areas related to the IAMP process include infrastructure and improved systems, as described below.

- *Infrastructure* - Transportation facilities in Oregon can be constructed or retrofitted to reduce fatal and serious injury crashes, which can be implemented through the inclusion of implementing safety treatments on a site-specific basis or implementing low-cost treatments system-wide. Actions for the infrastructure emphasis area include identified to minimize intersection and roadway departure crashes.

- *Improved Systems* - Opportunities to address and improve transportation safety come in various forms. Improved systems across professions actions starting with safety should be incorporated into responsibilities. Action items include to improve data, support law enforcement and minimize commercial vehicle crashes.

Project Relevance: Safety factors will be reflected in IAMP Goals and Objectives and the assessment of project alternatives.

Oregon Public Transportation Plan (2018)

The Oregon Public Transportation Plan (OPTP) is the OTP modal plan that provides guidance to ODOT and public transportation agencies regarding the development of public transportation systems. The guiding vision is to create:

- A public transportation system that is an integral, interconnected component of Oregon's transportation system that makes Oregon's diverse cities, towns, and communities work.
- Public transportation that is convenient, affordable, and efficient helps further the state's quality of life and economic vitality and contributes to the health and safety of all residents, while reducing greenhouse gas emissions.

The OPTP is designed to respond to trends, opportunities, and challenges that exist today, while providing an adaptable foundation for the future. The policies and strategies advance public transportation as an important piece of the overall transportation system, linking people to destinations, services, and opportunities, as well as to communities in neighboring states.

Project Relevance: The IAMP process will coordinate with Kayak, the regional public transit agency, and the City's transit program to ensure that planning outcomes are consistent with transit planning. A representative from Kayak will be invited to participate on the project advisory committee and will receive copies of each deliverable for review and comment to ensure coordination between the IAMP planning process and outcomes and regional transit operations and long-range planning.

LOCAL DOCUMENTS

Pendleton Comprehensive Plan (Updated 2013)

The City's Comprehensive Plan was originally adopted in 1983. Discrete elements of the Comprehensive Plan were updated during a periodic review work program (2011-2013). Elements that were updated in 2013 include:

- Historic Resource Inventory and historic preservation amendments (Goal 5)
- Commercial Buildable Lands Inventory (Goal 9)
- Residential Buildable Lands Inventory (Goal 10)

Comprehensive Plan map amendments, including Residential and Mixed Use Opportunity Areas

The Comprehensive Plan presents a thorough inventory and description of natural, social, economic, public facilities and services, and land use conditions existing at the time the Comprehensive Plan was developed. The plan was amended in 1999 and 2007 to include an updated set of population and employment growth projections and associated land needs for 2020 and 2026. The plan establishes goals and policies only for housing, transportation, and utilities. Several policies related to these elements were updated through the 2013 process.

The transportation sections in the existing Comprehensive Plan are updated by the City's 2007 TSP (see the City of Pendleton TSP section of this memorandum). The Pendleton Exit 207 and Exit 210 IAMPs will be adopted as an amendment to the City's TSP, which is part of the City's Comprehensive Plan. In terms of land use planning and participation goals, these long-range plans will be developed with citizen participation in committee meetings, public workshops, and public hearings, and will require coordination between the City and ODOT. The plans will be implemented through necessary amendments to the City's Comprehensive Plan policies and Development Code.

Project area Comprehensive Plan land use designations are as follows:

Exit 207

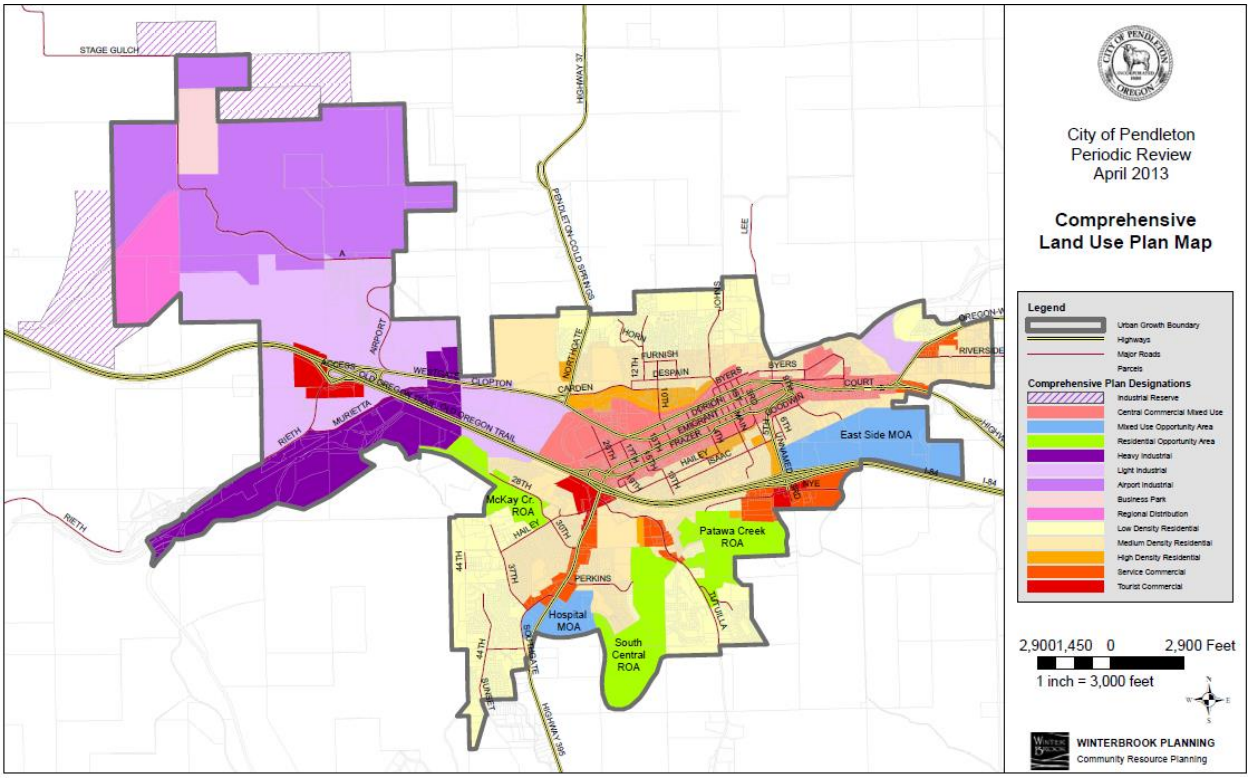
Tourist Commercial surrounding the land just south and north of the interchange. Beyond the Tourist Commercial zone, the Light Industrial zone to the north and south of the interchange, which gives away to Airport Industrial to the north and Heavy industrial to the south. The tourist commercial developments are meant to be areas for the motoring/touring public with uses such as hotels, motels, restaurants, service stations, recreational vacation parks, and information centers.

Exit 210

Comprehensive Plan designations south of highways are Service Commercial and Tourist Commercial. Currently, most of the developable land south of highway is built out but there are a few opportunities for development. North of I-84 there is a Mixed Use Opportunity Area (East Side

MOA) to the east of Oregon Route 11 and High Density Residential to the west. Service Commercial areas are intended to provide service and retail needs to residents. There is potential for development in the East Side MOA, however the topography of the area limits the amount of developable land.

Figure 1. Pendleton Comprehensive Plan Designations



Project Relevance: The IAMPs will need to be consistent with Comprehensive Plan policies, either existing or as proposed to be modified. Furthermore, the IAMPs will be adopted as an amendment to the City TSP, the Transportation Element of the City's Comprehensive Plan.

Pendleton Unified Development Code (Updated 2017)

The City's Unified Development Code (UDC) (Ordinance No. 3845) implements policies established in the City's Comprehensive Plan and regulates development through zoning designations and provisions that apply generally to all development and specifically to land divisions within the city.

Land inside the IAMP study area is designated with the following zoning:

- AA – Airport Activities
- M1 – Light Industrial
- M2 – Heavy Industrial

- C2 – Tourist Commercial
- C3 – Service Commercial
- R3 – High Density Residential
- R2 – Medium Density Residential
- R1 – Low Density Residential

Articles IV through IX of the Zoning Ordinance establish permitted uses and development standards for these zones.

Article XXI addresses amendments to UDC. The code establishes that the City Council, Planning Commission, or a property owner may initiate amendments. The amendments must be consistent with the City's Comprehensive Plan and Land Use Map, or the Comprehensive Plan text or map must be amended.

Article VIII addresses standards applicable in all zones, which includes transportation-related standards. Pedestrian and bicycle access and circulation are addressed in Section 8.05. Section 8.12, Transit Access and Supportive Facilities, regulates improvements at planned or existing transit stops.

Article XI establishes development standards for land divisions. Access to lots or parcels is regulated by Section 9.05. Access spacing standards found in the code are as follows:

- Arterials: 300-500 feet based on speed limit
- Collectors: 100 ft.
- Local Streets: 30 ft.

Joint and cross access requirements are addressed in Section 9.05. Section 9.08 regulates sidewalks, pedestrian and bicycle access ways, multi-use trails, and pathways. Requirements related to the dedication and maintenance of public improvements are found in Section 9.19 and 9.20.

Article XII includes provisions for amending the ordinance (Section 55). As with amendments to the Zoning Ordinance, proposed amendments to the text of the Subdivision and Partition Ordinance must be consistent with the City's Comprehensive Plan and Land Use Map, or an amendment to the Comprehensive Plan text and map is required.

Project Relevance: As the IAMP process progresses and recommendations are formed, the UDC will be evaluated to assess if amendments are needed to implement the recommendations of the IAMP.

Pendleton Transportation System Plan (2007)

The City of Pendleton's currently adopted TSP is essentially made up of transportation needs and policies established in the City's 1983 Comprehensive Plan, related code and policy amendments, and updated roadway, pedestrian facility, bicycle facility, and long-range project maps.

Transportation policies from the 1983 Comprehensive Plan (Part II), adopted as part of the 2007 TSP, apply to the Pendleton IAMPs study area. They include those related to the function of roadways according to functional classification, access, intersections, transportation options, freight, and targeted land uses.

- **Policy 1** establishes the purpose of roadways according to functional classification, including freeways, arterials, and collectors. The freeway and interchange provisions are superseded by, but are consistent with and reinforce, State regulations of these transportation facilities, as primarily documented in the OHP. The road classification section also includes road design standards, which were updated as part of the 2007 TSP update and in Section 9.11 of the UDC.
- **Policy 8** requires intersections to form at right angles and to provide for safe street intersections.
- **Policy 9** requires the City to provide for a range of transportation alternatives and encourages the City to plan transportation facilities and services to be compatible with and support surrounding planned land uses.
- **Policy 12** reinforces Policy 9 in requiring the City to develop and maintain a bicycle system on arterial and collector streets.
- **Policy 16** requires the City to support the expansion of trucking lines.
- **Policy 19** calls for the City to provide transportation facilities to serve industrial parks and industrial uses. With their prime freeway access, interchange areas are often targeted for trucking services in a community and industrial use siting criteria includes easy access to major transportation facilities like freeways and highways. Supporting and maintaining access of industrial areas to major transportation facilities remains a City priority.

Of the policies proposed during the 2007 TSP update, the most relevant policy to the IAMP planning process is the statement of need: "There is a need to adopt and enforce a fair, clear Transportation System Plan Map." Adoption of a preferred alternative for the interchange will include a projects list recommended for adoption and may include amendments to the TSP Map.

Four TSP Maps were prepared as part of the 2007 TSP Update: Pedestrian Facility, Bicycle Facility, Roadway, and Long-Range Project TSP Maps. The roadway projects below are located within or in the vicinity of the IAMPs study area. Pedestrian, bicycle, and transit projects were updated by the 2016 Active Transportation and Transit Plan, addressed later in this memorandum.

- **Roadway Transportation System Plan Map Proposed Roadways**
  - NE A Ave (arterial) continue to the west
  - Extension of SE Kirk Ave (proposed collector) to the east
  - Extensions of SE 11th St (proposed collector) to the south
  - Extension of SE 9th St and SE 8th Street to the south (and road connecting) to meet the extension of SE Kirk Ave
- **Roadway Transportation System Plan Long Range Projects Map**
  - Proposed long range collector, Old Airport Road, an alternative route from Murietta Rd to Airport Rd.
  - Proposed long range collector (unnamed) between SE Nye Ave and I-84 starting from intersection of Nye Ave and SE 6th Ave heading east.

There is no documentation of funding options or a funding plan to supplement the maps.

Project Relevance: The projects recommended in the TSP, either proposed or already constructed within the study area, will be considered in the development of the IAMPs. The IAMPs will be adopted as an amendment to the TSP and therefore will need to be found, or made, consistent with standards and policies in the TSP.

Pendleton Capital Improvement Plan

The City's Capital Improvement Program (CIP) schedules infrastructure improvements for construction over the short term (five years), including transportation improvements. The CIP document specifies the source of funding for these projects. There are no transportation improvements in the current CIP.

Project Relevance: Improvements recommended in the Pendleton IAMPs will be available for inclusion in a future City's CIP and may be coordinated with other programmed projects, where applicable.

City of Pendleton Standard Specifications (Updated 2019)

The City's Standard Specifications provide technical specifications for public works projects. General (narrative) specifications are provided for streets (Section 3:04) and for curbs, gutter, sidewalks, and driveways (Section 3:05). Engineering drawings of street elements are provided in the 200 series of the Standard Plans (dates on the drawings ranging from 1981 to 2019). They include the following drawings:

- Standard Plan 201 – Typical roadway section for Arterial Street, Collector Street,
- Minor Street (industrial), and Minor Street (residential)
- Standard Plan 201A – Minimum typical roadway sections for Collector and

- Minor Streets
- Standard Plan 201B – Minimum typical roadway sections for Arterial Street
- Standard Plan 201C – Minimum typical roadway sections for Industrial Street
- Standard Plan 203 – Standard Cul-de-sac for Residential Streets
- Standard Plans 206-209 and 214-215 – Curb, gutter, and sidewalk details
- Standard Plans 211A-211B – Wheelchair ramp standards
- Standard Plans 212-213 – Driveway approach and standards

Project Relevance: The Standard Specifications document can guide local street improvements in the IAMP study areas. The current engineering design specifications will be referenced for consistency with the recommendations and improvements identified during the IAMP process. Modifications or exceptions to the specifications may be needed to ensure consistency between them and the IAMPs.

Eastern Oregon Regional Airport Master Plan (2018)

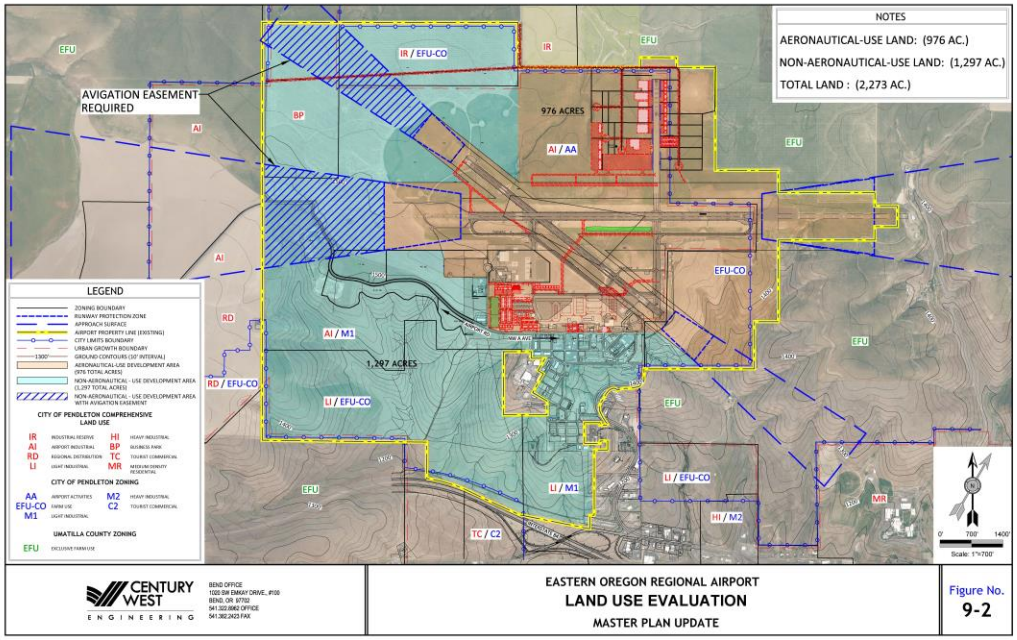
The plan, developed in partnership with the City of Pendleton and the Federal Aviation Administration, defines the current, short-term, and long-term needs of the airport. The airport currently provides the only commercial air service in Eastern Oregon to Portland International Airport (PDX).

The airport site, comprised of 2,200 acres, includes an Airport Industrial Park. The industrial park had 29 tenants as of 2018 and provides convenient and redundant access to I-84 by way of Airport Road. The industrial park has a State Regionally Significant Industrial Area (RSIA) designation, which allows the City to access current and anticipated state funding programs to develop the site in order to promote long-term job creation. The designation also allows for expedited state site reviews and regulatory processes related to development with the RSIA.

The airport site has some topographic constraints, but the developed area within the airport is expected to expand. Airport operations can expand with improvements to the airport infrastructure, the funding for which is expected to come from the industrial park and other developable land on the site.

Additionally, the proposed extension of Barnhart Rd. west of the airport, as proposed in the Transportation System Plan (2007), will provide an additional connection from I-84, at Exit 202, to the Eastern Oregon Regional Airport.

Figure 2. Eastern Oregon Regional Airport Master Plan Land Use Evaluation Map



Project Relevance: The current operations and planned expansions of the Eastern Oregon Regional Airport at Pendleton and the Airport Industrial Park will be considered in the development of the IAMPs, particularly with respect to potential impacts to Airport Road and its access to the interchange.

Pendleton Active Transportation and Transit Plan (2016)

The City of Pendleton Active Transportation and Transit Plan was developed in conjunction with ODOT, a project advisory committee, and community stakeholders. The plan serves as an amendment to the City's 2007 TSP, updating its active transportation (bicycling, walking, and rolling) and transit elements.

The following projects recommended in the plan are located in the Pendleton IAMPs study area or in the immediate vicinity:

- **Pedestrian Projects**
    - Exit 207 IMSA:
        - P 37 – Install either a multi-use pathway along the north side of US 30 or improve the highway to accommodate sidewalks and bike lanes (extends to Airport Road). *Priority – High*
        - P38 – Install sidewalks or a multi-use pathway on the south side of Murrietta Road. *Priority – Medium*

- **Bicycle Projects**
    - Exit 207 IMSA:
        - B22 – Install either a multi-use pathway along the north side of US 30 or improve the highway to accommodate sidewalks and bike lanes. *Priority – High*
    - Exit 210 IMSA:
        - B10 – Perform a refinement study to determine the feasibility of reallocating the four existing travel lanes on OR-11 in order to develop a bicycle lane or multi-use pathway on one side of the highway. *Priority – Low*
- **Transit Capital Projects**
    - Exit 210 IMSA:
        - T12 – Work with Kayak to enhance service, proposed stop at SE Nye Ave and SE 5th St. *Priority – Medium*

Two public transit systems currently operate in Pendleton: Kayak, a regional transit system; and Let'er Bus Transit, a local fixed route transit service. Let'er Bus is operated by the City of Pendleton, which began service in 2018. The Let'er Bus South/West Route crosses both interchanges. Only one stop is located in the IAMP study area, at SE Nye Ave/ SE 3rd Drive.

Kayak Public Transit, which provides four commuter bus routes, is operated by the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), which spans from southeastern Washington to northeastern Oregon. One stop is located in the project area at SE Nye Ave/SE 3rd Ave; the stop is served by the Metro line that runs from west Pendleton to Kayak Transit Hub (located at the Nixyaawii Governance Center). The stop also connects to the Let'er Bus South/West line. The Hopper and Whistler lines provide service to neighboring communities but do not currently have any stops within the study area.

Project Relevance: City active transportation/transit objectives and planned projects will be considered in the development of the IAMPs.

Pendleton Safe Routes to School Programs (Initiated 2019)

"Safe Routes to School" or "SRTS" refers to efforts that improve, educate, or encourage children safely walking (by foot or mobility device) or biking to school.[10] ODOT has two types of SRTS programs: infrastructure and non-infrastructure grants and technical assistance. Infrastructure programs focus on investments for crossings, sidewalks and bike lanes, flashing beacons, etc. Non-

[10] Definition from: https://www.oregon.gov/ODOT/Programs/Pages/SRTS.aspx

infrastructure programs focus on education and outreach, including developing Safe Routes to School Action Plans. In Pendleton, preliminary planning related to Safe Routes to School (SRTS) began in 2019, after the city secured a non-infrastructure grant. The planning will include conducting parent surveys, identifying barriers to walking and biking to school, and developing recommended improvements. A project in the Exit 210 IMSA expected to be on the list of improvements addresses access to Murray Junior High School from residential areas east of OR-11. The existing stairway is currently closed due to safety concerns related to the poor condition of the stairway.

Relevance: Murray Junior High School lies to the west of the Exit 210 IMSA. Evaluation of possible transportation solutions will need to consider the City's SRTS process and outcomes, including recommendations related to non-vehicular access to this school and improvements to enhance the safety of bicycles and pedestrians.

Morrow County/Umatilla County Transit Development Strategy (2018)

This document acknowledges the outcomes of previous transportation planning efforts carried out by ODOT in the region that show how Morrow and Umatilla County are closely integrated from a transportation perspective. Building upon the efforts outlined in the two Coordinated Human Services Transportation Plans, the plan focuses on transit solutions to address the larger inter- and intra-county transportation needs of various populations the two counties.

The plan identifies and evaluates potential transit service strategies and recommends prioritized strategies. The transit solutions assessment provides direction related to transit service within the IMSA(s) including the following:

- Transit Service:
    - Increase the geographic scope of fixed route transit service, including OR-11 corridor between Pendleton and Milton-Freewater/Walla Walla, WA.
    - Consider the special needs of providing transit service to industrial areas and rural employment clusters. With the level of industrial development anticipated for the Airport and greater industrial area, this area could qualify.

Additionally, the plan proposes two regional park-and-ride facilities in the Pendleton area, near the Exit 210 IMSA. Further, the plan proposes a fixed-route transit service from Pendleton to Kennewick (Tri-Cities); however, specific bus stop locations are not identified in the plan.

Project Relevance: The proposed improvements through the IAMP process will consider the transit facility and services proposed in the plan.