Appendix F: Findings

This appendix presents relevant state, regional, and local plans and policies, with information supporting the Hayden Island IAMP's compliance. In reviewing these findings, it is important to recall that the interchange will be built as part of the CRC project, which is still in the planning process. Therefore, these findings will refer to activities performed and information gathered as a part of the CRC process, including pending or future actions meant to achieve compliance. These findings will also refer to activities performed and information gathered as a part of the Hayden Island Plan, as that plan provides the land use component of this IAMP.

Statewide Land Use Goals

Goal 1: Citizen Involvement
Goal 1 requires the development of a citizen involvement program that is widespread, allows two-way communication, provides for citizen involvement through all planning phases, and is understandable, responsive, and funded.

Response:

Public involvement for the CRC project included:

- Convening a Community and Environmental Justice Group, which has met 30 times to date and includes members representing environmental justice communities and neighborhoods in the project area.
- 23 open houses, question and answer sessions, and listening sessions hosted to date
- Over 700 briefings and events attended by project staff to date, resulting in contact with over 21,000 people
- Updates provided at over 25 meetings of Hayden Island associations to date, including HI-NooN, Jantzen Beach Moorage and the Hayden Island Manufactured Home Community.
- Holding 35 meetings on Hayden Island to date to provide project information and gather public feedback.
- Inclusion of Hayden Island residents as members of the following CRC advisory committees: Community and Environmental Justice Group, Portland Working Group and Urban Design Advisory Group.
- Project information, booths, or presentations offered at more than 40 community venues.
- Information distributed to eight media sources, in addition to being made available on the project website.

Public involvement activities for the Hayden Island Plan included:

- Convening an advisory Steering Group, which met 11 times and was composed of 17 residents, 14 local businesses, 2 developers, the Port of Portland, ODOT, and the Portland Audubon Society.
- Holding four public community design workshops and two open houses.
- Conducting an online survey with 144 respondents.
- Scheduling multiple briefings and public hearings with the Portland Planning Commission prior to adoption by the City Council.

The IAMP also involved members of the public in crafting the plan. ODOT created a website that allowed materials to be posted and disseminated. The project team coordinated with previous efforts conducted through the CRC EIS process, and a list of interested parties has been maintained. This group was, and will continue to be, notified of important IAMP events. Thirteen parties directly impacted by potential access changes were each directly consulted at least one time to be able to communicate specific business or community concerns. Broad outreach was used to target those indirectly impacted.

The Citizen Involvement strategy also consisted of using existing venues to accommodate the schedules of those folks interested in participated. Several meetings were combined with pre-existing meetings related to the CRC project. ODOT and the City of Portland conducted an open house prior to an existing meeting of the Hayden Island neighborhood group (HI Noon). Members of that group were consulted about outreach ad the best ways to reach residents prior to developing the strategy.

Goal 2: Land Use Planning
This goal requires that a land use planning process and policy framework be established as a basis for all decisions and actions relating to the use of land. All local governments and state agencies involved in the land use action must coordinate with each other. City, county, state and federal agency and special districts plans and actions related to land use must be consistent with the comprehensive plans of cities and counties and regional plans adopted under Oregon Revised Statues (ORS) Chapter 268.

Response: The Hayden Island IAMP was developed in accordance with the policy framework presented in these findings, with ODOT providing ongoing coordination and collaboration with the CRC project and the City of Portland. The interchange design and circulation and access management plan were coordinated with and meet the needs of the Hayden Island Plan.

Preliminary tasks completed for the Hayden Island IAMP included a review of the following plans, policies, and regulations to determine their influence on the IAMP:

- Statewide Land Use Goals
- Oregon Transportation Plan
- Oregon Highway Plan
- OAR 660 Division 12 Transportation Planning Rule (TPR)
- OAR 731-015-0065 Coordination Procedures for Adopting Final Facility Plans

- OAR 734-051 Highway Approaches, Access Control, Spacing Standards and Medians
- 2035 Metro Regional Transportation Plan (RTP)
- I-5 Transportation and Trade Partnership Strategic Final Plan
- City of Portland Comprehensive Plan
- City of Portland Transportation System Plan (TSP)
- City of Portland Zoning Ordinances
- City of Portland Code Title 17: Public Improvements
- City of Portland Code Title 33: Planning and Zoning
- Hayden Island Plan

ODOT held 13 interagency technical meetings over a ten-month period. ODOT, the CRC project, and the City of Portland formed a Project Management Team (PMT), which established the IAMP planning process, developed and evaluated local circulation and access alternatives, and evaluated the consistency between the IAMP, the Hayden Island Plan, and the CRC project. The IAMP provides for coordination and consultation that will occur between ODOT, the City, and the CRC project as the CRC project moves toward final design, ODOT completes the access management strategy, and private properties in the interchange area undergo redevelopment.

As part of the CRC NEPA process in which the interchange design was developed, the project conducted ongoing coordination with three different agency groups:

- Interstate Collaborative Environmental Process group (InterCEP)
    - National Marine Fisheries Service
    - U.S. Army Corps of Engineers
    - U.S. Environmental Protection Agency
    - U.S. Fish and Wildlife Service
    - Washington State Department of Ecology
    - Washington State Department of Fish and Wildlife
    - Washington State Department of Archaeology and Historic Preservation
    - Oregon Department of Fish and Wildlife
    - Oregon Department of Land Conservation and Development
    - Oregon Department of State Lands
    - Oregon State Historic Preservation Office
    - Oregon Department of Environmental Quality
- Cooperating Agencies:
    - U.S. Army Corps of Engineers
    - U.S. Coast Guard
    - U.S. General Services Administration
    - Federal Aviation Administration
    - Washington State Department of Archaeology and History Preservation
    - National Park Service
- Participating Agencies:
    - City of Vancouver

- Clark County Community Development Department
- Clark Public Utilities
- Confederated Tribes of Grand Ronde
- Cowlitz Indian Tribe
- Portland Bureau of Development Services
- Portland Bureau of Environmental Services
- Portland Bureau of Water Works
- Portland Department of Transportation
- Portland Development Commission
- Portland Fire & Rescue
- Portland Office of Neighborhood Involvement
- Portland Parks and Recreation
- Portland Planning Bureau
- Portland Policy Bureau
- Vancouver Housing Authority
- Washington Department of Natural Resources

The CRC Project also consulted with the following tribal governments (asterisks indicate tribes with treaty rights to the Columbia River):

- Confederated Tribes of Grand Ronde
- Confederated Tribes of Umatilla*
- Confederated Tribes of Warm Springs*
- Cowlitz Tribe
- Nez Perce Tribe*
- Siletz Tribe
- Spokane Tribe
- Yakama Nation*
- Chinook (non-federally recognized)

As described in the Future Land Use and Traffic Operations section (p. 13), the Concept Plan Scenario from the Hayden Island Plan provides the land use component of the IAMP, and the evaluation of IAMP circulation alternatives utilized the traffic estimates associated with the Hayden Island Plan. The Hayden Island Plan was adopted by the Portland City Council in 2009.

Goal 9: Economic Development
This goal requires that local comprehensive plans and policies contribute to a stable and healthy economy in all regions of the state.

Response: Preserving the long-term function of the Hayden Island Interchange supports local, regional, and statewide economic development goals and plans. The island's neighborhood and regional retail centers are located in the interchange area and served by the interchange ring road. The interchange provides the sole link between Hayden Island and the adjacent cities, connecting traffic from Washington and other parts of Oregon to the Hayden Island businesses. The interchange also forms part of the I-5 Trade Corridor, which serves both regional traffic and long-distance freight movement connecting Canada, the United States, and Mexico. The

preferred local circulation alternative and the access management general provisions protect the function of the interchange: serving existing and planned uses on Hayden Island, and ensuring that capacity and operations are safe and adequate in the long-term to support movement on and off the island as well as along the I-5 corridor.

As noted in the CRC DEIS, the CRC project would result in improved economic development conditions for businesses in Portland and Vancouver by reducing congestion (to about 5 hours per day, versus 15 hours with the No-Build Alternative) and improving access and safety. This would support economic growth by improving travel times and travel reliability for freight, commuters, and other vehicles traveling between Portland and Vancouver. Project estimates place job creation/retention as a result of the CRC project at approximately 20,000 FTEs/year.

Goal 10: Housing
This goal requires the City plans provide for the appropriate type, location and phasing of public facilities and services sufficient to support housing development in areas presently developed or undergoing development or redevelopment.

Response: The interchange area contains existing residential development and sections are zoned to permit future residential development to occur. Island residents needing to travel across the island pass through the IAMP area when they do so. The Hayden Island Concept Plan Scenario includes a 238% increase in housing units, with residential density increasing in the interchange area (which will be served by the light rail station and bicycle/pedestrian pathways to be constructed as part of the CRC project). The projected increases in residential units and alternate mode share were taken into account in the traffic analysis of IAMP alternatives. Preserving the function and capacity of the interchange through adoption of the IAMP will benefit travelers to and from the island's residential areas.

Goal 11: Public Facilities and Services
Goal 11 requires cities and counties to plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development. The goal requires that urban and rural development be "guided and supported by types and levels of urban and rural public facilities and services appropriate for, but limited to, the needs and requirements of the urban, urbanizable and rural areas to be served."

Response: The IAMP provides for the build out of a street system to serve the function of the Hayden Island interchange and the needs of the Hayden Island land use plan.

Goal 12: Transportation
Goal 12 requires cities, counties, metropolitan planning organizations, and ODOT to provide and encourage a "safe, convenient and economic transportation system." This is accomplished through development of Transportation System Plans based on inventories of local, regional and state transportation needs. Goal 12 is implemented through OAR 660, Division 12, also known as the Transportation Planning Rule ("TPR"). The TPR contains numerous requirements

governing transportation planning and project development. (See the "OAR 660, Division 12" section of this document for findings of compliance with the TPR.)

Response: The Hayden Island IAMP is relying on the Hayden Island Plan for its land uses. The transportation system in the IAMP is adequate to serve the planned land use and meet OHP mobility standards at the ramp terminals of the I-5: Hayden Island interchange. The IAMP and Hayden Island Plan both encourage a safe, convenient and economic transportation system.

Oregon Transportation Plan (2006)

The Oregon Transportation Plan (OTP) is the state's long-range multimodal transportation plan. The OTP is the overarching policy document among a series of plans that together form the state transportation system plan (TSP). An IAMP must be consistent with applicable OTP goals and policies. Findings of compatibility will be part of the basis for IAMP approval. The most pertinent OTP goals and policies for interchange planning are as follows:

Policy 1.2: Equity, Efficiency and Travel Choices
It is the policy of the State of Oregon to promote a transportation system with multiple travel choices that are easy to use, reliable, cost-effective and accessible to all potential users, including the transportation disadvantaged.

Response: The CRC project will reconstruct the interchange ring road to include improved bicycle and pedestrian facilities, as well as a light rail station. Decisions on the design and location of bicycle and pedestrian facilities are deferred until CRC project final design. This IAMP does not preclude the facility designs proposed in the CRC Draft Environmental Impact Statement (DEIS) or the Hayden Island Plan from consideration.

Policy 1.3: Relationship of Interurban and Urban Mobility
It is the policy of the State of Oregon to provide intercity mobility through and near urban areas in a manner which minimizes adverse effects on urban land use and travel patterns and provides for efficient long distance travel.

Response: The improvements to the interchange and ring road will facilitate intercity mobility along the I-5 corridor, as well as travel between Hayden Island, Portland, and Vancouver. As documented in the IAMP, ODOT worked with the CRC project, City of Portland, and local stakeholders to assess the access and circulation needs associated with the local land uses, including them alongside the needs of the traveling public in the evaluation factors used to assess alternatives. The access management general provisions will allow flexibility for ODOT to make future access management decisions in a manner minimizing adverse effects on urban land use and travel patterns.

Policy 2.1: Capacity and Operational Efficiency

It is the policy of the State of Oregon to manage the transportation system to improve its capacity and operational efficiency for the long term benefit of people and goods movement.

Response: The Oregon Highway Plan sets the standard of volume-to-capacity ratio of 0.85 or better at freeway ramp terminals. As Table 3 (p. 17) shows, in the preferred local circulation alternative, all intersections have a V/C of 0.71 or better. Additionally, traffic analysis conducted by the CRC project found that the preferred local circulation alternative had V/Cs of 0.42 and .43 or better at the ramp terminals. The preferred local circulation alternative also meets Portland City Code performance standards of LOS D or better at signalized intersections and LOS E or better at stop-controlled intersections (Title 17.88.050).

Policy 2.2: Management of Assets
It is the policy of the State of Oregon to manage transportation assets to extend their life and reduce maintenance costs.

Response: The IAMP's general provisions include purchase of the ring road and access control by ODOT. Ownership of the ring road and access control will enable ODOT to protect the long term system capacity of the interchange through ongoing management of the roads that are integral to its function. In order to maximize the operational life of the interchange, the general provisions include a raised median on the ring road, indicate that private approaches to streets other than the interchange ring road are preferred, and indicate that private and local street approaches should be avoided in intersection areas.

Policy 3.1: An Integrated and Efficient Freight System
It is the policy of the State of Oregon to promote an integrated, efficient and reliable freight system involving air, barges, pipelines, rail, ships and trucks to provide Oregon a competitive advantage by moving goods faster and more reliably to regional, national and international markets.

Response: The interchange improvements will increase efficiency and reliability for freight trucks accessing Hayden Island businesses. Hayden Island currently supports approximately 238 businesses employing 2,952 persons, with 350 acres of retail/commercial space and 193 acres of industrial space. While the Hayden Island Plan assumes a 40% decrease in retail square footage and a 10% decrease in industrial square footage, commercial and industrial uses will continue to be an important presence on Hayden Island as future development occurs. The factors used to evaluate local circulation and access alternatives included the efficient and safe movement of freight on locally designated truck access streets. The preferred local circulation alternative requires less out-of-direction travel for freight trucks and provides more direct access to the businesses nearest the interchange area than the other alternatives considered. ODOT, the City, and the CRC project also met with local businesses and property owners for detailed discussions of their access needs related to freight movements, which will be taken into account when developing the access management strategy. Freight modes other than trucks are not significantly affected by the IAMP.

Policy 3.2: Moving People to Support Economic Vitality
It is the policy of the State of Oregon to develop an integrated system of transportation facilities, services and information so that intrastate, interstate and international travelers can travel easily for business and recreation.

Response: As described earlier in these findings (see response to Statewide Land Use Goal 9), the CRC project and the Hayden Island IAMP improve mobility on and off Hayden Island as well as along the I-5 corridor.

Policy 4.1: Environmentally Responsible Transportation System
It is the policy of the State of Oregon to provide a transportation system that is environmentally responsible and encourages conservation and protection of natural resources.

Response: The CRC project has evaluated potential environmental impacts to natural resources, including ecosystems, water quality, wetlands, geology and groundwater, hazardous materials, and air quality. These analyses are described and presented in the Draft Environmental Impact Statement that was published in May, 2007. The DEIS was accompanied by a series of technical reports focused on these specific elements of the environment; these reports provide supporting documentation and detailed discussion of the various analyses that informed the DEIS.

For the portion of the project on Hayden Island, the primary natural resource issue is stormwater. Currently, and under No Build conditions, stormwater from the I-5 interchange flows untreated into the Columbia River. The CRC project would add stormwater treatment to clean the runoff to adhere to local, state, and federal water quality standards.

Policy 5.1: Safety
It is the policy of the State of Oregon to continually improve the safety and security of all modes and transportation facilities for system users including operators, passengers, pedestrians, recipients of goods and services, and property owners.

Response: The Hayden Island IAMP sets a goal of ensuring safe and efficient operations between connecting roadways and protecting the function, operations, and safety of the interchange. While the constrained urban environment on Hayden Island means that it is not possible for the IAMP to meet ODOT access spacing standards, the preferred local circulation alternative moves in the direction of these standards. The general provisions also create a framework for minimizing the number of private approaches to the ring road, with full turning movement generally occurring only at signalized intersections. This will simplify traffic operations on the ring road, reducing potential conflicts between vehicles and also reducing the number of private approaches that pedestrians and bicyclists moving along the ring road will have to cross.

Policy 7.1: A Coordinated Transportation System

It is the policy of the State of Oregon to work collaboratively with other jurisdictions and agencies with the objective of removing barriers so the transportation system can function as one system.

Response: As described earlier in these findings (see response to Statewide Land Use Goal 2), development of this IAMP involved ongoing collaboration with the City of Portland and the CRC project to ensure consistency with the Hayden Island Plan and the CRC project. The local access and circulation alternatives were evaluated for consistency with the transportation system adopted in the Hayden Island Plan. The preferred local circulation alternative focuses interchange traffic on the ring road and off of the locally-designated Main Streets (N Tomahawk Island Dr and Avenue B), preserving their local functions. The access management strategy will seek to balance 1) preserving the safety and mobility of the ring road by minimizing private road approaches, and 2) preserving the multimodal character of the Main Streets, which could be degraded if too much vehicular traffic and/or road approaches are channeled onto those streets. The local circulation alternative also allows for the future construction of the local streets in the Hayden Island Master Street Plan.

Policy 7.3: Public Involvement and Consultation
It is the policy of the State of Oregon to involve Oregonians to the fullest practical extent in transportation planning and implementation in order to deliver a transportation system that meets the diverse needs of the state.

Response: As described earlier in these findings (see response to Statewide Land Use Goal 1), the CRC project, Hayden Island Plan, and IAMP all incorporated public involvement activities including multiple public meetings and events, inclusion of Hayden Island Stakeholders in committees and working groups, and opportunities to offer input at multiple points in the planning process.

Policy 7.4: Environmental Justice
It is the policy of the State of Oregon to provide all Oregonians, regardless of race, culture or income, equal access to transportation decision-making so all Oregonians may fairly share in benefits and burdens and enjoy the same degree of protection from disproportionate adverse impacts.

Response: In addition to the public involvement activities described earlier in the findings (see response to Statewide Land Use Goal 1), the CRC project engaged environmental justice populations through the following activities:

- Convening a Community and Environmental Justice Group, which has met 30 times to date and includes members representing environmental justice communities and neighborhoods in the project area.
- Press releases and project information distributed to publications with high minority readership
- Briefings to housing and social service organizations, minority business associations, and neighborhood organizations that represent low income and minority populations
- Informational booths at ethnic and community festivals and events
- Project folio and fact sheets translated into Spanish, Russian and Vietnamese

- Translated materials posted on project Web site and distributed to organizations that work with low income and minority populations
- Display ads for open houses translated in Spanish
- Translators are available at all open houses, upon request

The community, cultural resource and environmental effects studied in the Draft Environmental Impact Statement (EIS) have been reviewed for potential impacts on Environmental Justice populations. The basic steps in this analysis include:

1. Identify impacts
2. Evaluate the demographics of those populations that would be impacted
3. Consider mitigation and benefits
4. Determine whether the combination of adverse effects, mitigation and benefits would result in disproportionate high and adverse effects on low income or minority populations.

The Draft EIS found that the project would not likely result in disproportionately high and adverse impacts to environmental justice populations. The Final EIS will update this analysis and present findings on the potential of the project to result in disproportionately high and adverse impacts to environmental justice populations.

The IAMP process held public meetings at time when stakeholders and community members could attend. ODOT consulted with representatives of the manufactured homes community as well as the Plaid Pantry, both of which serve Hayden Island's lower income residents. There are no anticipated negative impacts from the IAMP. Other efforts were combined with existing processes set forth in the development of the CRC EIS.

Oregon Highway Plan

The 1999 Oregon Highway Plan (OHP) establishes policies and investment strategies for Oregon's state highway system over a 20-year period and refines the goals and policies found in the OTP. Policies in the OHP emphasize the efficient management of the highway system to increase safety and to extend highway capacity, partnerships with other agencies and local governments, and the use of new techniques to improve road safety and capacity. 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 policies applicable to planning for the Hayden Island interchange improvements are described below.

Policy 1A (Highway Classification) *defines the function of state highways to serve different types of traffic that should be incorporated into and specified through IAMPs.*

Policy 1C (State Highway Freight System) *states the need to balance the movement of goods and services with other uses.*

Response: I-5 is classified as an Interstate Highway and is designated as a Freight Route. The evaluation factors used to assess IAMP alternatives were selected to balance the needs of freight, traffic passing through the I-5 corridor, trips onto and off of Hayden Island, and local trips within the Island itself. By directing freight and interchange traffic onto the ring road, while focusing local movements and private approaches onto the city streets identified in the Hayden Island Plan, the IAMP reduces conflicting use of these facilities by different types of traffic.

Policy 1B (Land Use and Transportation) *recognizes the need for coordination between state and local jurisdictions as well as coordination between land use and transportation decisions to efficiently use public infrastructure investments.*

Response: As described earlier in these findings (see response to Statewide Land Use Goal 2), development of this IAMP involved ongoing collaboration with the City of Portland, and the Hayden Island Concept Plan Scenario and associated traffic analyses were used to guide the development and selection of IAMP local circulation and access alternatives. The IAMP provides for a transportation system that is adequate to serve the planned land use and maintain the function of the interchange.

Policy 1F (Highway Mobility Standards) *sets mobility standards for ensuring a reliable and acceptable level of mobility on the highway system by identifying necessary improvements that would allow the interchange to function in a manner consistent with OHP mobility standards.*

Response: The preferred local circulation alternative in the IAMP has an intersection V/C ratio of .42 and .43, which meets the with on/off-ramp V/C ratios of 0.45 or better, meeting the OHP standard of V/C of 0.80 or better for interstate highways in metropolitan planning organizations (as well as the alternative mobility standard of V/C of 1.1 or better for I-5 between the Marquam Bridge and the Interstate Bridge).

Policy 1G (Major Improvements) *requires maintaining performance and improving safety by improving efficiency and management before adding capacity. ODOT works with regional and local governments to address highway performance and safety.*

Response: The CRC project, which necessitated this IAMP, engaged in a planning process that resulted in the recommendation to add capacity on the I-5 main line, on the Hayden Island Interchange, and on the ring road. The locally preferred alternative reflecting this recommendation emerged out of a planning process that engaged the public as well as the local and regional governments. The IAMP seeks to manage the interchange area in a way that will protect the function of the interchange for the life of the investment, consistent with the hierarchy in OHP Action 1.G.1.

Policy 2B (Off-System Improvements) *helps local jurisdictions adopt land use and access management policies.*

Response: The Hayden Island Plan, which began prior to the IAMP process, has adopted land uses for the island that also provide the land use component of the IAMP. The City of Portland does not have access management policies, and ODOT used the IAMP process as an opportunity to familiarize the City with ODOT's access management standards and the engineering considerations that underlie them as well as incorporate consideration of ODOT Access Management standards in future approach decisions in the IAMP management area.

Policy 2F (Traffic Safety) *improves the safety of the highway system.*

Response: As described earlier in these findings (see OTP Policy 5.1), the IAMP addressed safety by moving in the direction of access spacing standards and establishing access management general provisions that minimize potential traffic conflicts in the interchange area.

Policy 3A (Classification and Spacing Standards) *sets access spacing standards for driveways and approaches to the state highway system.*

Response: As described earlier in these findings (see OTP Policy 5.1), the constrained urban environment on Hayden Island meant that it was not possible for the IAMP to meet ODOT access spacing standards. The preferred local circulation alternative moves in the direction of these standards. The general provisions will guide subsequent access management decisions to move in the direction of meeting access management standards, while allowing ODOT to balance the standards against the access needs of current and future land uses.

Policy 3C (Interchange Access Management Areas) *sets policy for managing interchange areas by developing an IAMP that identifies and addresses current interchange deficiencies and establishes short, medium and long term solutions.*

Response: The IAMP is based upon construction of the interchange improvements that form part of the CRC Project's locally preferred alternative. The general provisions include the purchase of ring road access control by ODOT and encourage the redirection of ring road approaches to local streets in the short term, to reduce potential traffic conflicts on the roads serving the interchange. The provisions also include possible medium- and long-term consolidation of accesses on N Jantzen Drive between N Hayden Island Drive and N Tomahawk Island Drive (the only ring road segment where ODOT will not purchase access control), with alternative access to accommodate development needs. The access management strategy will further identify short-, medium-, and long-term actions to manage access in the interchange area.

Policy 3D (Deviations) *establishes general policies and procedures for deviations from adopted access management standards and policies.*

Response: As described earlier in these findings (see OTP Policy 5.1 and OHP Policies 3A, 3C), the constrained urban environment on Hayden Island requires that

ODOT deviate from access management spacing standards. The Regional Access Management Engineer (RAME) participated in PMT and public involvement meetings for the IAMP. The RAME identified where local circulation and access alternatives would not meet standards, reviewed factors affecting the safety, efficiency, and mobility that deviations would provide, and contributed to the development of the general provisions. The RAME will lead the development of the access management strategy, using the policies on granting deviations to guide decisions regarding private road approaches.

OAR 660 Division 12 Transportation Planning Rule (TPR)

The purpose of the TPR is "to implement Statewide Planning Goal 12 (Transportation) and promote the development of safe, convenient and economic transportation systems that are designed to reduce reliance on the automobile so that the air pollution, traffic and other livability problems faced by urban areas in other parts of the country might be avoided." A major purpose of the Transportation Planning Rule (TPR) is to promote more careful coordination of land use and transportation planning, to ensure that planned land uses are supported by and consistent with planned transportation facilities and improvements. The TPR references OAR 731, Division 15 for ODOT coordination procedures for adopting facility plans and plans for Class 1 and 3 projects.

Section 660-012-0005 through 660-012-0050

Response: These sections of the TPR contain policies for preparing and implementing a transportation system plan. The Hayden Island IAMP is consistent with the City's existing transportation system plan and most of these sections are not applicable. The TPR requires that local governments adopt land use regulations consistent with state and federal requirements "to protect transportation facilities, corridors, and sites for their identified functions (OAR 660-012-0045(2))." The City of Portland recently adopted the Hayden Island Plan which set into place the transportation and land uses for the area.

Section 660-012-0055 – Timing of Adoption and Update of Transportation System Plans

Response: Part 5 of this section requires cities and counties to update their TSPs and implementing measures when a refinement plan has been completed. The IAMP is consistent with the Transportation System Plan element of the Hayden Island Plan.

Section 660-012-0060 – Plan and Land Use Regulation Amendments

Response: Part 1 of this section requires that where an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation would significantly affect an existing or planned transportation facility, the local government shall put in place measures to assure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility. Current and future planned land uses were considered in development of

the CRC Project preferred interchange alternative (as described in the CRC Draft Environmental Impact Statement) in order to ensure the interchange's ability to support future traffic demands. The Hayden Island Plan also demonstrated that the interchange design can accommodate future planned land uses. The IAMP is a new refinement of the OHP and is not a plan amendment subject to 0060

OAR 731-015-0065 Coordination Procedures for Adopting Final Facility Plans

OAR 731-015-0065 regulates ODOT procedure for adopting facility plans. An IAMP is a facility plan. The procedure outlined in OAR 731-015-0065 requires that ODOT coordinate with DLCD and local government agencies during development of the plan and provide a draft of the facility plan to affected cities, counties, and other agencies for comment. The facility plan must be consistent with statewide planning goals and local comprehensive plan policies, and findings of compatibility must be presented to the Oregon Transportation Commission for facility plan adoption.

Response: The Hayden Island IAMP is the result of a collaborative planning effort between ODOT and the City of Portland. Coordination with DLCD will occur during the review process of the the draft plan in Fall of 2009.

Findings addressing statewide goals and requirements, as well as local plan policies, are included in this Exhibit. A final draft of the IAMP will be provided to all affected government and other agencies, and any potential conflicts with state or local plans will be jointly resolved through the OTC adoption process. Findings of compliance with statewide planning goals and local comprehensive plans also will be included in materials.

OAR 734, Division 51. Highway Approaches, Access Control, Spacing Standards and Medians

OAR 734-051 governs the permitting, management, and standards of approaches to state highways to ensure safe and efficient operation of the state highways. OAR 734-051 policies address the following:

- How to bring existing and future approaches into compliance with access spacing standards, and ensure the safe and efficient operation of the highway;
- The purpose and components of an access management plan; and
- Requirements regarding mitigation, modification and closure of existing approaches as part of project development.

Section 734-051-0125, Access Management Spacing Standards for Approaches in an Interchange Area, establishes interchange management area access spacing standards. It also specifies elements that are to be included in IAMPs, such as short-, medium-, and long-range actions to improve and maintain safe and efficient roadway operations within the interchange area.

Section 734-051-0135, Deviations from Access Management Spacing Standards establishes a process for allowing approaches that do not meet spacing standards. It also specifies who has the authority to make certain decisions under certain criteria.

Section 734-051-0155, Access Management Plans, Access Management Plans for Interchanges and Interchange Area Management Plans. This section describes when IAMPs should and must be developed, things to consider and identify in the IAMP, and how they are approved.

Response: The local circulation and access management plan component of the Hayden Island IAMP includes general provisions for how more detailed access decisions will be made both prior and subsequent to construction of the Hayden Island Interchange. The IAMP management area is an existing built environment and the plan moves in the direction of the spacing standards

The current locations of the first signalized intersections and access locations relative to the ramp terminals do not meet standards for spacing from ramp terminal intersections. This plan indicates that ODOT will take ownership of those roads, purchase access control, and provide reservations where safety and operations will not be compromised.

Individual approach locations will be examined during the access strategy component of project development, after the Record of Decision (ROD) has been filed on the CRC EIS. Additional coordination will occur with the City of Portland and affected property owners at that time, after the conceptual project design has been finalized.

The Hayden Island IAMP is required due to it being a significant improvement to an existing interchange. Consistent with OAR 734-051-0155, the IAMP is being developed at the time of design, identifies opportunities to improve operations and safety in the interchange area, includes short and long term actions to improve operations and safety, considers geometry and traffic volumes, considers current and planned land uses, and is consistent with local comprehensive plans and the OHP.

2035 Metro Regional Transportation Plan (RTP)

Response: The CRC project is listed in the financially constrained RTP, and the IAMP and Hayden Island Plan both are consistent with transportation system development principles set forth in the RTP.

Hayden Island Plan

The Hayden Island Plan was initiated to address development on the island and at the congested Interstate 5 (I-5) interchange, as well as to provide guidance for the CRC project. The City of Portland and the Hayden Island community collaborated to develop goals, objectives, a comprehensive plan, zoning changes, and an implementation

strategy to improve the accessibility, livability, and sustainability of Hayden Island over the next 35 years.

Response: The IAMP used the Hayden Island Plan (with its associated comprehensive plan, zoning changes, and development forecasts) as the land use component of this facility plan. ODOT coordinated with the City to evaluate whether the local circulation and access alternatives supported the adopted master street plan and the local street network (a system of classifications and designs which were not adopted but reflected the City and community's intentions for the Island's future development). The preferred local circulation alternative conformed more closely than the other alternatives to the master street plan, while still moving in the direction of meeting ODOT spacing standards. The long-term function of the interchange and ring road improvements were analyzed based on the traffic generated by the land uses associated with the comprehensive plan.

Portland City Code

Title 17: Public Improvements requires that new residential development or development in an existing or future mixed-use area provides for street connections no further apart that 530 feet, and for bicycle and/or pedestrian connections no further apart than every 330 feet, except where prevented by barriers such as topography, railroads, freeways, pre-existing development, or natural features where regulations do not allow construction of or prescribe different standards for streets. Upon redevelopment, property owners must provide improvements as necessary to ensure that properties have direct access by frontage or recorded easement of at least 10 feet in width to a street used for vehicular traffic. The City Code allows the construction of one driveway for each property frontage. An additional driveway is allowed for each 100 feet of property frontage. All driveways are reviewed by the City Engineer to ensure the safe and orderly flow of pedestrian, bicycle and vehicular traffic.

Response: The City of Portland does not have access spacing standards for highway interchanges. I-5 creates a significant physical barrier which made it impossible that City street connection spacing standards be met. Maintaining the safe operations of the highway ramps also required that the distance between ramps and ring road intersections move in the direction of ODOT spacing standards. The preferred local circulation alternative represents a compromise between these two sets of standards, providing for safe and efficient functioning of the interchange and ring road while allowing for a denser grid to be built in the interior of the ring road while redevelopment occurs. Bicycle and pedestrian connections are not established by the IAMP; the CRC project will consult with the City in final design of the ring road to refine the design and location of bicycle and pedestrian facilities. Tension exists between the City Code's allowance of one driveway per 100 feet of property frontage and Division 51, which promotes driveway/approach consolidation. The access management strategy will address this conflict in state regulations and City Code by ensuring that all private properties have reasonable access.

Title 33: Planning and Zoning notes that, in addition to the above maximum distances, through streets and pedestrian connections should generally be at least 200 feet apart. It

states that dead-end streets should generally not exceed 200 feet in length, with turnarounds that accommodate fire vehicles required where dead-end streets exceed 300 feet in length.

Response: All streets altered or constructed as part of the IAMP are at least 200 feet apart. For streets constructed upon redevelopment that may be dead-ended, it will be the responsibility of the property owners constructing the streets to provide turnarounds where needed.