

APPENDIX H – FINDINGS

SUNRISE EXPRESSWAY INTERCHANGE MANAGEMENT AREAS

Findings

Statewide Planning Goals

Oregon law created a hierarchy of consistency between local, regional and state plans. The foundation of Oregon's land use planning program is a set of 19 Statewide Planning Goals ([http://www.lcd.state.or.us/LCD/goals.shtml#Statewide Planning Goals](http://www.lcd.state.or.us/LCD/goals.shtml#Statewide_Planing_Goals)) OAR 660-15-0000 (1-15). The goals express the state's policies on land use and related topics, such as citizen involvement, housing, and natural resources.

Oregon's statewide goals are achieved through local comprehensive plans. State law requires each city and county to adopt a comprehensive plan and the zoning and land-division ordinances needed to put the plan into effect. The local comprehensive plans must be consistent with the Statewide Planning Goals. Plans are reviewed for such consistency by the state's Land Conservation and Development Commission (LCDC). When LCDC officially approves a local government's plan, the plan is said to be "acknowledged". It then becomes the controlling document for land use in the area covered by that plan.

Clackamas County's and the City of Happy Valley's Comprehensive Plans have been acknowledged; therefore consistency with the policies and implementation measures of the Comprehensive Plan is considered compliance with the statewide goals. The City of Damascus is currently developing its first Comprehensive Plan. The City of Damascus Comprehensive Plan and Transportation System Plan will need to be consistent with the Rock Creek Interchange Area Management Plan (IAMP). If consistency issues develop during development of the Damascus plans, they will need to be resolved, possibly by amendment of the IAMP.

When a local jurisdiction's Comprehensive Plan is revised, each application for change is reviewed against the requirements of the goals.

This appendix will list and describe the statewide goals reviewed during amendment of a Comprehensive Plans in order to insure that the local government comprehensive plan maintains its consistency with the state planning goals, while being updated through the IAMP process. These goals include: Goal 1 (Citizen Involvement), Goal 2 (Land Use Planning), Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces), Goal 7 (Areas Subject to Natural Hazards), Goal 8 (Recreational Needs), Goal 9 (Economic Development), Goal 10 (Housing), Goal 11 (Public Facilities and Service), Goal 12 (Transportation), and Goal 14 (Urbanization).

Goal 1 (Citizen Involvement)

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

***Finding:** Appendix E of the Sunrise Expressway Interchange Area Management Plans (IAMPs) contains a summary of the public involvement efforts that were undertaken as part of the IAMPs project. These efforts included the following:*

- *Three rounds of open houses/public meetings covered the following topics:*
 - *Winter/Spring 2008 Open Houses: IAMP background, purpose, existing conditions, proposed IAMP areas*
 - *Spring 2009 Community Meeting: Draft IAMPs*
 - *Fall 2009 Open Houses: Final IAMPs*
- *A series of stakeholder briefings and focus group meetings in early 2009 gathered public input on IAMP concepts before taking the Draft IAMPs out to the public in the spring.*
- *A public open house held on April 13, 2008, to discuss the new Rock Creek Junction interchange and the IAMP;*
- *Small group meetings held on May 2-4, 2008, to answer project-specific questions from business owners and residents in the vicinity of the proposed interchange;*
- *A newsletter sent out to individuals near the proposed interchange to provide information and notification of the public involvement events; and*
- *A postcard announcing the small group meetings sent to business and property owners adjacent to the proposed interchange.*

The draft IAMP was made available for public review and comment for a 30-day period in May 2009. Notice of the public review draft was sent via postcard to individuals near the proposed interchange and those who had expressed interest at previous public events. Public comment was accepted via email, mail and telephone.

Public hearings on the proposed changes to the Clackamas County Comprehensive Plan and implementing ordinances were held by the Clackamas County Planning Commission and Board of Commissioners during Summer/Fall of 2010. These hearings provided opportunities for public comment on the proposed changes.

This information demonstrates consistency with Goal 1.

Goal 2 (Land Use Planning) and OAR 660, Division 4

Goal 2, Land Use Planning, and OAR 660, Division 4, require 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. Goal 2 includes several requirements:

It requires planning coordination between those local governments and state agencies, "which have programs, land ownerships, or responsibilities within the area included in the plan." With regard to the Sunrise Expressway IAMPs, Goal 2 requires that ODOT coordinate with Clackamas County, the City of Happy Valley and the City of Damascus, each of which has planning authority over some of the area impacted by the proposed interchange improvements. Coordination is particularly important because development within the county or these cities will impact use of the interchange, and land use decisions could affect future use and operation of the interchange.

Finding: Preliminary tasks for the Sunrise Expressway IAMPs included a thorough review and analysis of all relevant state, regional and local planning documents in order to establish a planning process and policy framework. The following documents were reviewed:

- *Applicable Oregon Statewide Planning Goals;*
- *Oregon Administrative Rule 731, Division 15, Department of Transportation Coordination Rules;*
- *Oregon Transportation Plan (2006);*
- *Oregon Highway Plan (1999);*
- *Oregon Administrative Rule 734-051, Highway Approaches, Access Control, Spacing Standards and Medians;*
- *Metro Regional Urban Growth Goals and Objectives (RUGGOs) (1991);*
- *Metro 2040 Growth Concept (1995);*
- *Metro Regional Transportation Plan (2007);*
- *Clackamas County Comprehensive Plan (2008);*
- *Clackamas County Zoning Ordinance;*
- *Clackamas County Transportation System Plan (2000);*
- *Happy Valley Comprehensive Plan (2009);*
- *Happy Valley Zoning Ordinance;*
- *Happy Valley Transportation System Plan (2008); and*
- *East Happy Valley Comprehensive Plan Update (2009).*

This review identified how the documents influence planning for the proposed Sunrise Expressway interchange.

The Sunrise Expressway IAMPs were prepared jointly by Clackamas County, the cities of Happy Valley and Damascus and ODOT. Coordination between these agencies took place routinely throughout the process. A subgroup of the Sunrise Project Management Team (PMT) was established to guide the IAMP process. The PMT subgroup consisted of representatives from Clackamas County, Happy Valley, Damascus and ODOT. An Access Management Team (AMT) made up of ODOT and Clackamas County staff met to make decisions regarding access. Meetings of these groups are documented in the Access Management Plan section of the IAMP. ODOT staff facilitated and supported the adoption of the IAMPs both by Clackamas County, the cities of Happy Valley and Damascus, and by the Oregon Transportation Commission (OTC). ODOT, Clackamas County, Happy Valley and Damascus will continue to coordinate on development activity and land use actions within the interchange areas.

Goal 2 has a provision that land use decisions and actions be supported by an "adequate factual base." This requirement applies to both legislative and quasi-judicial land use actions and requires that such actions be supported by "substantial evidence." In essence, it requires that there be evidence that a reasonable person would find to be adequate to support findings of fact that a land use action complies with the applicable

review standards.

Finding: *This requirement is met through the technical analysis associated with the IAMPs. Appendices B and C of the IAMPs contain an analysis of the existing and future conditions within the IAMP study areas. These appendices describes the land use and zoning conditions and historic growth patterns in the vicinity of the proposed interchanges, and provide an inventory of existing transportation facilities and their relative functionality. Appendix B also provides a detailed description of the land use scenario that was used, including future household and employment growth and development patterns. The scenario was used for modeling the transportation network and determining where deficiencies may occur over time. A summary of deficiencies and issues is provided based on analysis of current conditions.*

Appendix D provides information and analysis concerning the alternatives considered for the Sunrise Expressway interchanges and refinements to the preferred alternative.

The analysis determined that improvements to the Sunrise Expressway interchange areas were necessary in order to accommodate existing and future traffic.

Appendices A through D offer a factual base to support the Sunrise Expressway Interchange Area Management Plans and provide evidence to demonstrate compliance with the applicable Clackamas County, Happy Valley and Damascus review standards.

Goal 5: (Natural Resources, Scenic and Historic Areas, and Open Spaces)

This goal requires that natural resources, scenic and historic areas and open spaces be protected. The goal states that these elements be inventoried and planned for.

Finding: *The Project Management Team worked closely with resource agencies such as Metro, to develop interchange plans that to the greatest extent possible protect natural resources, scenic and historic areas and open spaces. The preferred interchange designs avoid, to the greatest extent possible Rock Creek and its tributaries. Where avoidance is not possible, the IAMP recommends that mitigation occur within the areas designated for a new interchange.*

In addition, the IAMPs were prepared in conjunction with the Sunrise Project SDEIS/FEIS, which has a section on impacts to natural resources, scenic and historic areas and open spaces. This section compiled an extensive inventory of all cultural and natural resources, which might be affected by the Sunrise project.

Goal 7: (Areas Subject to Natural Hazards)

The purpose of this goal is to protect people and property from natural hazards.

Finding: *While the areas are subject to certain natural hazards, such as landslides and earthquakes, design of the facilities will minimize structural damage from earth movements.*

The interchanges are not in a designated 100-year floodplain.

The design of these structures is part of the design and engineering of the interchange facilities and not applicable to this IAMP.

In addition, the IAMPs were prepared in conjunction with the Sunrise Project SDEIS/FEIS, which has a section on impacts to natural resources, scenic and historic areas and open spaces.

Goal 8 (Recreational Needs)

The purpose of this goal is to satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Finding: *In order to satisfy this goal, the project management team worked closely with the Clackamas County and the Cities of Happy Valley and Damascus. There are no recreational facilities in the immediate areas of the proposed interchanges. The project management team also coordinated with Metro Greenspaces and North Clackamas Parks & Recreation District (NCPRD) to accommodate passage of recreational trails proposed for the Sunrise Corridor, at location of overpasses for local streets and streams. An off-system multi-use trail is designed into the Sunrise project and crossings of interchange ramp terminals and cross streets serving the interchanges are accommodated at intersections with pedestrian crossing accommodations (signals and crosswalks).*

The second half of this goal is not applicable as there are no plans to site a destination resort within the interchange management areas, or in their immediate vicinities.

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.

Finding: *The Sunrise Expressway Interchanges provide a vital function in supporting local and regional economic development goals and plans. Local traffic, including commercial vehicles, must have safe and efficient access to the Sunrise Expressway. The intent of the IAMPs are to protect the function of the interchanges; proposed IAMP policy language illustrates the County's and the Cities' role in preserving capacity and improving operations at the interchanges. Adopting the IAMPs will ensure that transportation improvements will be available to support the planned employment uses in Clackamas County and the Cities of Happy Valley and Damascus, consistent with this economic development goal.*

Goal 10: (Housing)

This goal requires the County's and the Cities' plans provide for the housing needs of citizens of the state.

Finding: *While land in the immediate vicinity of the Sunrise Expressway Interchanges is mostly zoned for Industrial, Commercial, Mixed Employment, and Regionally Significant Industrial use; there is some residentially zoned land. Construction of the*

interchanges will require removal of some existing housing.

The interchanges serve all of West Central Clackamas County, East Happy Valley and West Damascus, including existing and planned residential areas and will help facilitate traffic movements to and from these areas.

Goal 11 (Public Facilities Planning) and OAR 660, Division 11

Goal 11, Public Facilities Planning and OAR 660, Division 11, require 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."

Finding: *Transportation facilities are considered a primary type of public facility. The Sunrise Expressway IAMPs document the current and future transportation needs of the urban, urbanizable, and rural areas in the vicinity of Sunrise Expressway. The analysis of possible alternatives concluded that the grade-separated interchanges are the appropriate facilities to serve planned growth within the urban growth boundary as well as through-transportation needs to other parts of the state.*

The IAMPs contain "Policy Actions" that will guide growth within the vicinity of the interchanges to ensure that development takes place at a rate and density that is compatible with the capacity of the interchanges.

The IAMPs do not affect other public facilities.

Goal 12 (Transportation) and OAR 660, Division 12

Goal 12, Transportation, 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.)

Finding: *The purpose of the Sunrise Expressway interchanges are to improve the safety and efficiency of traffic flow through the area. The objectives of the Sunrise Expressway IAMPs are to protect the functionality of the interchanges and its ability to serve future transportation demands.*

The IAMPs contain a discussion of the transportation analysis that was conducted in order to determine future demand, available capacity, deficiencies and necessary improvements for these interchange areas. The analysis demonstrates that the planned transportation facilities will be adequate to safely and efficiently serve trips generated by future land uses for a period of at least 20 years.

Relevant language of the IAMPs is adopted into the Transportation System Plans of Clackamas County, Happy Valley, and will be incorporated into the Damascus TSP,

when Damascus completes their TSP planning process. Policy and zoning ordinance language, as provided in IAMP Appendix G, is added to the Comprehensive Plans and Zoning Ordinances of Clackamas County, Happy Valley and the Damascus Comprehensive Plans, in order to maintain interchange functions and ensure that development inconsistent with the objectives of the IAMPs does not cause unexpected traffic volumes or create non-conforming access points. The standards reserve capacity at the interchanges so it is not consumed prematurely. IAMP policies provide for coordination between Clackamas County, Happy Valley, Damascus, and ODOT for any land use actions proposed within the IAMP study areas. Local plans must be consistent with state plans. Proposed plan amendments involving land use actions that would exceed standards set forth in the IAMPs first must be approved by the Oregon Transportation Commission.

The Sunrise Expressway IAMPs were jointly developed by ODOT, Clackamas County, Happy Valley, and Damascus. Policy language contained in the IAMPs mandates continued coordination between these agencies for management of the interchange areas. Current and future planned land uses were considered in the design of the interchanges in order to ensure their ability to support future traffic demands. Policies within the IAMPs are intended to manage land uses around the interchanges to avoid unplanned growth and development that may impact the function of the facilities. The policies also require that plan amendments and zone changes within the IAMP study areas must not result in a significant impact on the interchange facilities. If significant impacts are expected, then the IAMPs must be amended and mitigation strategies, including funding plans, must be adopted.

The IAMPs call for construction of interchanges. The IAMPs document the various design alternatives that were considered, the criteria that were used to evaluate the alternatives, and the rationale for selecting the preferred alternatives.

The TPR requires local governments to 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)). This policy is achieved through a variety of measures, including:

- Access control measures which are consistent with the functional classification of roads and consistent with limiting development on rural lands to rural uses and densities;*
- Standards to protect future operations of roads;*
- A process for coordinated review of future land use decisions affecting transportation facilities, corridors or sites;*
- A process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities, corridors or sites;*
- Regulations to provide notice to ODOT of land use applications that require public hearings, involve land divisions, or affect private access to roads; and*

- *Regulations assuring 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. See also OAR 660-012-0060.*

In addition to the measures noted above, the TPR (660-012-0060 Plan and Land Use Regulation Amendments) requires:

- (1) 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 as provided in section (2) of this rule to assure that allowed land uses are consistent with the identified function, capacity and performance standards (e.g. level of service, volume to capacity ratio, etc.) of the facility.
- (4) (A) *Planned interchange means new interchanges and relocation of existing interchanges that are authorized in adopted transportation system plan or comprehensive plan;*

The interchange areas as defined in the Interchange Area Management Plans adopted as an amendment to the Oregon Highway Plan

This is the area in which planning and analysis for the IAMPs takes place locally and is the area in which local governments must comply with interchange-related state access management rules.

The Oregon Land Conservation and Development Commission's (LCDC's) rules implementing Goal 12 do not regulate access management. That is regulated by OAR 734, Division 51.

Goal 14 (Urbanization) and OAR 660, Divisions 14 and 22

Goal 14, Urbanization, requires an orderly and efficient transition from rural to urban land use. This is accomplished through the establishment of Urban Growth Boundaries (UGBs). UGBs and unincorporated community boundaries separate urbanizable land from rural land. Land uses permitted within the urban areas are more urban in nature and higher intensity than in rural areas, which primarily include farm and forest uses. Goal 14 is important because it focuses development within relatively compact boundaries of the UGB and, to a lesser degree, in unincorporated communities. This compact development helps contain the costs of public facilities by reducing the need to expand facilities further out from existing services and population centers. The location, type, and intensity of future development within the management area will impact the function and operational life of the interchange.

Additionally, **ORS 197.298** establishes priorities for including land inside urban growth boundaries. The first (highest) priority for inclusion is land that is designated "urban reserve" land. The second priority is land adjacent to a UGB that is identified as "an exception area or non-resource land." The third priority is land that is designated as "marginal land" pursuant to ORS 197.247. The final (lowest) priority is land that is designated for agriculture, forestry, or both.

***Finding:** The Sunrise Expressway interchange planning areas are located entirely within Portland metropolitan area UGB. The interchanges are needed to serve urban land uses, including residential and employment in their vicinity.*

Goal 3 Agricultural Lands

Goal 4 Forest Lands

Goal 6 Air, Water and Land Resources Quality

Goal 13 Energy Conservation

Goal 15 Willamette River Greenway

Goal 16 Estuarine Resources

Goal 17 Coastal Shorelands

Goal 18 Beaches and Dunes

Goal 19 Ocean Resources

These goals were determined not to be applicable to the development of the IAMPs. Goals 3 and 4 are not applicable because the area within the IAMPs is within the Metro urban growth boundary. Goal 6 is not applicable because no changes to waste and discharge will occur from these plans, and environmental quality will not fall below accepted state or federal standards as a result of the plans. Goal 13 is not applicable as no changes will occur to density of land use nor will it encumber energy conservation efforts in the area of the plans. Goal 15 is not applicable because the Willamette River Greenway is not in or near the interchange areas. Goals 16, 17, 18, 19 are not applicable because no estuarine resources, coastal shorelands, beaches or dunes or ocean resources exist in or near the interchange areas.

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:

Goal 1 – Mobility and Accessibility

POLICY 1.1 - Development of an Integrated Multimodal System

It is the policy of the State of Oregon to plan and develop a balanced, integrated transportation system with modal choices for the movement of people and goods.

***Finding:** The Sunrise Expressway interchanges will facilitate an integrated multimodal system by efficiently separating high-speed through movements from local movements. The interchanges will also facilitate the efficient movement of bicycle and pedestrian traffic by separating them from more high-speed through movements and freight traffic on the Sunrise Expressway.*

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.

***Finding:** Improved bicycle and pedestrian facilities are incorporated into the designs for the interchanges. Any new roadway projects (including local streets) will meet current applicable standards. Pursuant to existing local requirements, 5-foot wide sidewalks will be constructed as part of all collector or local streets planned within the interchange areas, with separate bike lanes required for roadways classified as collectors or above. The Local Street Connectivity Plans include connections for bicycles and pedestrians where street connections are not possible or practical*

The Sunrise Project is planned to include bus service on the facility, including a transit stop at the proposed medical facility near the Sunrise Expressway Rock Creek Junction interchange.

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.

- **STRATEGY 1.3.2** – Develop and manage the transportation network so that local trips can be conducted primarily on the local system, and the statewide facilities can primarily serve intercity movement and interconnect the systems.

***Finding:** The Sunrise Expressway IAMPs provide for improved safety and intercity mobility along the OR 212 and OR 224 corridors. The IAMPs regulate access and land uses in the vicinity of the interchanges to ensure the facilities will operate at levels consistent with established state/regional mobility standards for the 20-year planning horizon and beyond.*

The Sunrise Project has coordinated with local partners in the vicinity of the Sunrise Expressway Interchanges, through their TSPs, to develop/enhance the local street network, to accommodate local access and connectivity. A proposed new local arterial (Rock Creek Blvd.) will provide connectivity between the Rock Creek Junction interchange and SE 162nd Ave. and SE 172nd Ave, in Happy Valley, as will connecting currently stubbed-out streets in Damascus; provide greater connectivity between neighborhoods, and improved access to OR 212. OR 212/224 is planned on becoming a Clackamas County arterial once the entire Sunrise Project is completed.

New connections are also planned in the Midpoint and West interchange areas that will facilitate local traffic through those areas.

Goal 2 – Management of the System

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.

***Finding:** The Sunrise Expressway interchanges will better facilitate the capacity and operational efficiency of connecting roadways (Sunrise Expressway, OR212/224, Rock Creek Blvd.) by separating local traffic movements from through movements.*

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.

- **STRATEGY 2.12** – Protect the integrity of transportation corridors and facilities from encroachment by such means as managing access to state highways and limiting incompatible land use around facilities.
- **STRATEGY 2.1.6** – Support incentives and regulation for locating high traffic generators such as hospitals and mixed use development near fixed route, high frequency public transportation.

***Finding:** The Sunrise Project was developed in response to safety, capacity and operational efficiency issues affecting the OR 212/224 corridor. Short term actions in the IAMPs accomplish these management objectives by minimizing access locations through these sections of OR 212/224, OR 212 and OR 224. The medium-term and long-term actions in the IAMPs protect long-term system capacity by ensuring that the interchanges continue to function at a level that meets the mobility expectations of the state. The IAMPs contain policies that regulate land use in the vicinity of the interchanges by requiring that proposed land use actions must include a review of potential impacts to interchange operations.*

The stated purpose of the IAMPs is to maximize the operational life of the Sunrise Expressway Interchanges, and consequently, protect the State’s investment in the facilities. Specifically, the goal of the IAMPs is to protect the function and operation of the interchanges and the local street networks within the IAMP areas. This includes providing safe and efficient connections between local streets and state highways and minimizing local traffic traveling through the interchanges. The IAMPs require proposed changes to the planned land use system to demonstrate consistency with IAMPs policies protecting the long-term function of the interchange facilities.

Goal 3 – Economic Vitality

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.

- **STRATEGY 3.1.1** - Develop coordinated state, regional and local transportation plans and master plans that address current and future freight needs, issues, and economic strategies.

Finding: *The OR 212/224 corridor serves as a primary connection between I-205 and the Mt. Hood Highway (US 26), and to central and eastern Oregon. The highway is a designated Statewide Freight Route in the Oregon Highway Plan. It serves the Clackamas Industrial Area to the west, the location of major regional distribution centers (Fred Meyer Safeway, USF Reddaway), as well as the newly designated Regionally Significant Industrial Area (RSIA) in Happy Valley, near the Sunrise Expressway Rock Creek Junction Interchange.*

The Sunrise Expressway will become the designated Freight Route upon its construction, and become the principal facility for freight traffic and regional through-trips. This new facility will alleviate the congestion and conflicts of combined local trips and through-trips currently experienced on OR 212/224. The Sunrise Expressway IAMPs provide management tools to ensure the continued safety and efficiency of travel along the Sunrise Corridor, particularly in the vicinity of the new interchanges.

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.

Finding: *The Sunrise Expressway interchanges will serve to connect an inter-regional facility to other inter-regional facilities (OR 212 and OR 224), thus facilitating movement of travelers between OR 212 and OR 224 and I-205 and US 26.*

POLICY 3.4 – Downtowns and Economic Development

This policy is not applicable as there are no downtowns within the Interchange Management Areas.

Goal 4 – Sustainability

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.

Finding: *IAMP policy language protects resource land within the IAMP study area by restricting the location and operation of approach roads in the vicinity of the interchanges consistent with the existing designations in the comprehensive plan. The Sunrise Expressway interchanges will span numerous small waterbodies including Rock Creek, home to threatened and endangered salmonid species. The FEIS for the Sunrise project contains detailed information concerning conservation and protection of natural resources in Chapter 3.*

POLICY 4.2 – Energy Supply

This policy is not applicable.

POLICY 4.3 – Creating Communities

This policy is not applicable.

Goal 5 – Safety and Security

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.

***Finding:** The Sunrise Expressway IAMPs address high crash rates along this section of OR 212/224. The highway improvements minimize access to the highway and the grade-separated interchanges limits conflicts between local and regional trips - a contributing cause for vehicle crashes in the area. The interchange designs, and the specified locations and authorized use of approach roads provide for long-term highway safety.*

The interchanges will also provide for separation of high-speed expressway traffic and slower speed arterial traffic including bicycles and pedestrians.

POLICY 5.2 – Security

This policy is not applicable.

Goal 6 – Funding the Transportation System

POLICY 6.1 – Funding Structure

It is the policy of the State of Oregon to develop a transportation finance structure that addresses the public funding aspects of all modes and reinforces plan strategies. This structure should include provisions for flexibility in the use of new funding sources and new partnerships to achieve system integration while also protecting transportation funds for transportation purposes.

***Finding:** A first phase of the Sunrise project is being constructed with JTA funds. This first phase will not construct any of the interchanges proposed for the Sunrise Preferred Alternative.*

ODOT has worked and will continue to work in partnership with Clackamas County and the Cities of Happy Valley and Damascus to develop acceptable funding packages to implement the Sunrise Expressway Interchange Area Management Plans.

POLICY 6.2 – Achievement of State and Local Goals

It is the policy of the State of Oregon to plan and manage the transportation finance structure to contribute to the accomplishment of state and local environmental, land use and economic goals and objectives.

***Finding:** Through the environmental process and continuing through final design and construction of the Sunrise Expressway interchanges, ODOT and its partner agencies have and will continue to incorporate state and local environmental, land use and economic goals and objectives.*

POLICY 6.3 – Public Acceptability and Understanding

It is the policy of the State of Oregon to use finance mechanisms that have broad public acceptance and are understandable to transportation system users.

***Finding:** The use of JTA funds has been approved in coordination with ODOT and its partner agencies*

POLICY 6.4 – Beneficiary Responsibility

It is the policy of the State of Oregon to examine mechanisms to expand the beneficiary pay concept to reflect the costs and benefits of uses of the transportation system and reinforce the relationship between benefiting from transportation facilities and paying for their benefit, but to retain essential fairness including cost responsibility. This policy recognizes some modes will continue to need subsidies to achieve overall transportation system goals and provide essential services.

***Finding:** Development of the Sunrise Expressway Environmental Impact Statement included an analysis of tolling. Because of the minimal length of the facility and the availability of numerous parallel routes, tolls were not considered a viable option.*

POLICY 6.5 – Triage in the Event of Insufficient Revenue

It is the policy of the State of Oregon to resolve revenue shortfalls by means that maximize public acceptance and that minimize undesirable long-term consequences to the overall transportation system in urban and rural areas.

***Finding:** Because of the potential funding shortfall, the Sunrise Expressway Midpoint and Rock Creek Junction interchanges are projected to be constructed at a later date. Current funding allows for construction of a phase of the Sunrise Expressway, from I-205 to SE 122nd Avenue, as a limited access arterial. As part of this initial project phase, elements of the West interchange will be constructed. The Sunrise Expressway interchanges are in the Financially Constrained Regional Transportation Plan.*

Goal 7 – Coordination, Communication and Cooperation

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.

***Finding:** In addition to close coordination with local jurisdictions in the Sunrise Corridor (Clackamas County, City of Happy Valley, and City of Damascus), Metro, representatives from area tribes (Grande Ronde, Warm Springs, Siletz) were involved in the Sunrise Project SDEIS.*

Strategy 7.1.5

Coordinate tribal, federal, state, regional and local planning to protect transportation facilities, corridors and sites for their identified functions and to facilitate community development. This includes adopting appropriate regulations.

***Finding:** ODOT worked in collaboration with Clackamas County, Happy Valley and Damascus to develop and adopt the IAMPs. Improvements to local street connectivity and access to state facilities within the IAMP area were further coordinated in the development and updating of local jurisdiction TSPs. The IAMPs policy language adopted by these local jurisdictions requires continued coordination between themselves and ODOT to protect the long-term function of the interchange.*

POLICY 7.2 – Public/Private Partnerships

This policy is not applicable.

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.

Strategy 7.3.1

In all phases of decision-making, provide affected Oregonians early, open, continuous, and meaningful opportunity to influence decisions about proposed transportation activities. When preparing and adopting a multimodal transportation plan, modal/topic plan, facility plan or transportation improvement program, conduct and publicize a program for citizen, business, and tribal, local, state and federal government involvement. Clearly define the procedures by which these groups will be involved.

***Finding:** Appendix E provides a summary of the public involvement efforts that took place during development of the IAMPs. Various methods were used to gather public input about the interchange area management plans, including open houses, a series of small group meetings, and a public review and comment period for the draft IAMPs. Press releases to announce the open houses and small group meetings were sent to all local newspapers, as well as local radio and television stations. Input from citizens was used to evaluate alternatives. These opportunities were provided equally to all, regardless of race, culture or income.*

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.

Strategy 7.4.1

Provide equal access to public information and decision-making about transportation planning, financing, construction, operations and maintenance activities.

Finding: *The Final Environmental Impact Statement (Chapter 3, page 109) documents environmental justice populations to ascertain whether any environmental justice populations are being disproportionately impacted by the project. There are no impacts to environmental justice populations that are disproportionately greater than the population of the area as a whole.*

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.

Under Goal 1: System Definition, the following policies are applicable:

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.

Finding: *The Sunrise Expressway is classified as a Statewide Highway and is designed and managed as an Expressway. Interchanges along the expressway carry the same designation. OR 212/224 is also classified as a Statewide Highway. OR 224, south of Sunrise Expressway is classified as a District Highway. The Sunrise Expressway and OR 212/224, west of Sunrise Expressway and OR 212 east of Sunrise Expressway are on the NHS and are Freight routes.*

Policy 1B (Land Use and Transportation) establishes a requirement for the state to coordinate land use and transportation decisions with local jurisdictions to efficiently use transportation investments.

Finding: *Coordination between state and local jurisdictions occurred throughout the preparation of the IAMPs, and in the preparation/updating of local jurisdictions' TSPs. A Project Management Team (PMT) subgroup was formed to inform the IAMP process and included members representing Clackamas County, ODOT, Happy Valley, and Damascus. The PMT subgroup met four times and reviewed draft documents in order to provide consensual revisions. Policy Actions in the IAMPs speak to ongoing coordination between the state and local jurisdictions concerning the efficient use of transportation investments.*

Clackamas County adopted implementing language for the IAMPs into its Comprehensive Plan in August, 2010. The City of Happy Valley adopted implementing language in January, 2011. Because the City of Damascus has no acknowledged Comprehensive Plan, they have provided a Letter of Support for the Rock Creek Junction IAMP.

Policy 1C (State Highway Freight System) states the need to balance the movement of goods and services with other uses and to recognize the importance of maintaining efficient through movement on major truck freight routes.

***Finding:** The Existing Local Circulation and Private Property Approaches section of the Sunrise Expressway IAMPs summarizes the functional classification of roadways within the IAMP study areas. OR 212/224 and OR 212 are classified as Statewide Freight Routes. The Sunrise Project will be constructed as a limited access expressway and is designated as a Freight Route.*

The Sunrise Expressway interchanges improve freight mobility through the area by addressing safety and efficiency issues that have been identified at current intersections and throughout the corridor due to the conflict of combined regional freight movements and local trips. Existing freight distribution centers to the west (Clackamas Industrial Area), and lands zoned as Regionally Significant Industrial Area (RSIA) to the east of the Sunrise Expressway interchanges, will benefit from the construction of a new, limited-access expressway and the Sunrise Expressway interchanges in the corridor.

Policy 1D (Scenic Byways)

This policy is not applicable because the Sunrise Expressway is not designated as a Scenic Byway.

Policy 1E (Lifeline Routes) provides a secure lifeline network of streets, highways, and bridges to facilitate emergency services response and to support rapid economic recovery after a disaster.

***Finding:** The Sunrise Expressway interchanges will provide for quick and easy access to a major medical facility being planned for the northeast quadrant of the Rock Creek Junction interchange. The facilities constructed as part of the interchanges will meet modern seismic standards in place at the time of construction.*

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.

***Finding:** The analysis of existing and future traffic conditions in the vicinity of the Sunrise Expressway Interchanges shows that the existing highway cannot perform at the level expected in the OHP without modernization. Traffic analysis done for the Sunrise Project including the Sunrise Expressway interchanges, demonstrates that the facilities will accommodate the mobility standards of the OHP throughout the 20-year planning horizon.*

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.

Finding: Appendix D summarizes the alternatives that were evaluated for their potential to accommodate existing and future traffic demand at the Sunrise Expressway interchanges. Those alternatives included an evaluation of a 2030 No-Build scenario with retention of at-grade intersection, as well as different Build Alternative roadway alignments and interchange designs. The 2030 No-Build alternative, that did not include grade-separated interchanges, does not provide a solution to the highway capacity and highway safety needs. Therefore, adding capacity is the necessary means for improving safety and efficiency in this highway section.

Policy 1H (Bypasses) Generally they relocate a highway alignment around a downtown, an urban or metropolitan area or an existing highway. The goal of bypass facilities is to effectively serve state and regional traffic trips. It is the policy of the State of Oregon to build bypasses to provide safe, efficient passage for through travelers and commerce.

Finding: The Sunrise Expressway will serve as a bypass of a segment of OR 212/224, between Rock Creek Junction (OR 212/224 split) and I-205. The Sunrise Expressway interchanges will provide the points of access/egress to/from this bypass that have become a bottleneck in the state system and causes inefficiencies in the delivery of freight.

Under Goal 2: System Management, the following policies are applicable:

Policy 2A (Partnerships) It is the policy of the State of Oregon to establish cooperative partnerships to make more efficient and effective use of limited resources to develop, operate, and maintain the highway and road system. These partnerships are relationships among ODOT and state and federal agencies, regional governments, cities, counties, tribal governments, and the private sector.

Finding: ODOT has worked with Federal Highway Administration, Clackamas County and the Cities of Happy Valley and Damascus in the development of the Sunrise Expressway IAMPs. Other state agencies involved with the development of the IAMPs include the Department of Justice and the Department of Land Conservation and Development.

Policy 2B (Off-System Improvements) helps local jurisdictions adopt land use and access management policies. Supports state financial assistance to local jurisdictions to develop, enhance, and maintain improvements on local transportation systems when they are a cost-effective way to improve the operation of the state highway system.

Finding: Both Clackamas County and the City of Happy Valley have access management policies and actions. For the proposed Rock Creek Boulevard, ODOT and the City of Happy Valley jointly developed approach spacing policies designed to facilitate improved access to land uses north of the interchange, including a regionally significant medical facility. The IAMP actions minimize the use of OR 212/224, OR 212, and OR 224 for property access. For most properties, local roads

provide access. Off-system improvements within the Sunrise Expressway IAMP areas were identified in the IAMP process, as well as in the local jurisdiction TSP process.

Policy 2C (Interjurisdictional Transfers) It is the policy of the State of Oregon to consider, in cooperation with local jurisdictions, interjurisdictional transfers that:

- Rationalize and simplify the management responsibilities along a particular roadway segment or corridor;
- Reflect the appropriate functional classification of a particular roadway segment or corridor; and/or
- Lead to increased efficiencies in the operation and maintenance of a particular roadway segment or corridor.

Finding: *ODOT is working with Clackamas County to determine the jurisdiction of the existing OR 212/224 highway once the Sunrise Expressway and all its components are completed.*

Policy 2D: (Public Involvement). This policy ensures that there are sufficient opportunities for citizens, businesses, and local governments to provide input into improvement projects that affect the state highway system.

Finding: *A Policy Committee (PRC) consisting of local government representatives and a Project Advisory Committee (PAC) consisting of local citizens and business representatives were convened as a part of the Sunrise Project SDEIS, and met regularly with the project team on the development of the Sunrise Expressway IAMPs. Summaries of the public meetings are provided in Appendix E of the Sunrise Expressway IAMPs. This effort included the following:*

- *A series of public open houses were held in 2008 and 2009 to discuss the new Sunrise Expressway interchanges and the IAMPs;*
- *Project Advisory Committee meetings held to obtain feedback on a variety of project deliverables, including the purpose and need, evaluation criteria, interchange design concepts and draft IAMPs.;*
- *A newsletter sent out to individuals near the proposed interchange to provide information and notification of the public open house; and*
- *A web site was available to provide information and upcoming open houses.*

Appendix E contains the information for the public involvement of the Sunrise Expressway IAMPs. The IAMPs were jointly developed by Clackamas County and the cities of Happy Valley and Damascus, and ODOT.

The Sunrise Expressway IAMPs have adequately addressed Policy 2D.

Policy 2E (Intelligent Transportation Systems) It is the policy of the State of Oregon to consider a broad range of Intelligent Transportation Systems services to improve system efficiency and safety in a cost-effective manner. Deployment of ITS shall reflect the user service priorities established in the Oregon Intelligent Transportation Systems Strategic Plan. Specifically:

- Incident Management

- En-route Driver Information
- Traffic Control (Arterials and Freeways)
- Route Guidance
- Commercial Vehicle Electronic Clearance
- Pre-trip Travel Information
- Public Transportation Management
- Emergency Notification and Personal Security
- Emergency Vehicle Management
- Commercial Fleet Management

Finding: *Policy 2E is an operational component and not a project design or land use issue.*

Policy 2F (Traffic Safety) It is the policy of the State of Oregon to continually improve safety for all users of the highway system using solutions involving engineering, education, enforcement, and emergency medical services.

Finding: *An important reason for planning for the interchanges is to address safety issues in this section of the highway. The IAMPs protect the safe and efficient operation of the interchanges by regulating access and land use in the vicinity, and through separation of local, regional, and freight movements.*

Policy 2G (Rail and Highway Compatibility)

This policy is not applicable to the Sunrise Expressway IAMPs, as no rail facilities are impacted by the project.

Under Goal 3: Access Management, the following policies are applicable:

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

Finding: *The Sunrise Expressway is a limited access facility. The IAMPs largely adhere to the approach road spacing standards in the OHP. There are three areas within the IAMPs (one in each of the three IAMPs) where access spacing cannot be achieved. One location within the West IAMP is at the existing OR 212/224 (Clackamas) Interchange. This is a pre-existing condition where established land uses and road networks create a situation whereby SE Johnson Road is well within the access spacing requirements of the Southbound I-205 offramps and SE 82nd Drives is well within the access spacing requirements for the northbound ramps. The second location is within the Midpoint IAMP. The intersection of the new extension of SE 122nd Avenue and the existing OR 212/224 is only about 1000' from the eastbound ramp terminals for the Midpoint interchange. The third occurrence is within the Rock Creek Junction IAMP. The last NB right-out exit onto OR 224/connection before the Rock Creek Junction interchange EB on-ramp is approximately 800'. The reasons for deviating from this standard are provided in detail in the Access Management Plan. This deviation is sought to provide access for an existing neighborhood.*

The IAMPs contain short, medium, and long-term access strategies that will be applied within the IAMP planning areas in order to regulate existing and future driveways and other approaches in the vicinity of the interchanges.

Policy 3B (Medians) It is the policy of the State of Oregon to plan for and manage the placement of medians and the location of median openings on state highways to enhance the efficiency and safety of the highways, and influence and support land use development patterns that are consistent with approved transportation system plans.

Finding: *Medians will be placed within the crossroad of the Sunrise Expressway Rock Creek Junction interchange (Rock Creek Boulevard) as appropriate to control traffic movements. SE 82nd Drive will also have medians in the full build-out of the preferred alternative within the vicinity of the existing intersection of OR212/224. Neither of these locations are on the state system.*

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.

Finding: *The purpose of the Sunrise Expressway IAMPs is to effectively manage the OR 212/224, OR 224 and OR 212 interchange areas. The IAMPs provide recommendations for short, medium, and long term implementation and access management actions, as well as land use policies that are intended to protect the interchange into the 20-year planning horizon and beyond.*

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

Findings: *The Access Management Plan component of the IAMPs identifies an access point that will require an access spacing deviation request, and the rationale for the request. Deviations will be requested in accordance with the applicable state procedure.*

Policy 3E (Appeals) It is the policy of the State of Oregon to manage appeals of both denied requests for approach roads and denied requests for deviations from adopted access management standards and policies through an appeals process to ensure statewide consistency.

Finding: *This policy is not applicable.*

Under Goal 4: Travel Alternatives, the following policies are applicable:

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. The Sunrise Express way, OR 212/224, OR 212 and OR 224 highways are designated Freight Routes.

Finding: *Refer to Policy 1C above.*

Policy 4B (Alternative Passenger Modes) It is the policy of the State of Oregon to advance and support alternative passenger transportation systems where travel demand, land use, and other factors indicate the potential for successful and effective development of alternative passenger modes.

***Finding:** With the construction of the Sunrise Expressway interchanges, alternative modes of transportation will be better supported, especially bicycle and pedestrian travel. Bicycle and pedestrians will be able to cross through the interchanges on designated facilities for their use and not have to come in direct conflict with fast-moving through traffic.*

The interchanges will also allow for new bus transit service along the Sunrise Expressway to safely exit the facility and access the regional employment areas near the interchanges.

Policy 4C (High-Occupancy Vehicle (HOV) Facilities) It is the policy of the State of Oregon to utilize HOV facilities to improve the efficiency of the highway system in locations where travel demand, land use, transit, and other factors are favorable to their effectiveness. A systems planning approach shall be taken in which individual HOV facilities complement one another and the other elements of the multimodal transportation system.

***Finding:** The Sunrise Expressway interchanges will be able to facilitate the implementation of HOV facilities.*

Policy 4D (Transportation Demand Management) It is the policy of the State of Oregon to support the efficient use of the state transportation system through investment in transportation demand management strategies.

***Finding:** ODOT in cooperation with Clackamas County and the Cities of Happy Valley and Damascus and local employers located in the Sunrise Expressway Interchange Management Areas will actively pursue TDM strategies designed to alleviate traffic demand on the interchange and supporting road network.*

Policy 4E (Park-and-Ride Facilities) It is the policy of the State of Oregon to encourage the efficient use of the existing transportation system and to seek cost-effective expansion of the highway system's passenger capacity through development and use of park-and-ride facilities.

***Finding:** ODOT in cooperation with Clackamas County and the Cities of Happy Valley and Damascus, TriMet and local employers located in the Sunrise Expressway Interchange Management Areas will actively pursue locating park-and-ride facilities designed to alleviate traffic demand on the interchanges and supporting road network.*

Under Goal 5: Environmental and Scenic Resources, the following policies are applicable:

Policy 5A (Environmental Resources) This policy states that the design, construction, operation and maintenance of the state highway system should maintain or improve the natural and built environment where affected by ODOT facilities.

***Finding:** The Sunrise Expressway IAMPs were done in conjunction with the Sunrise Project SDEIS and the Environmental Impact Statement addresses environmental resources and what actions are to be taken to avoid or mitigate any impacts to both the natural and built environment.*

Policy 5B (Scenic Resources) This policy applies to all state highways and commits the State to using best management practices to protect and enhance scenic resources in all phases of highway project planning, development, construction and maintenance.

***Finding:** Although the Sunrise Expressway largely traverses an industrial corridor with limited scenic resources, this policy was considered as part of the IAMP project, and will be implemented largely by complying with other state and local policies and regulations. No impacts to these resources are anticipated..*

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 assure 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.

This rule identifies transportation facilities, services and improvements which may be permitted on rural lands consistent with Goals 3, 4, 11, and 14 without a goal exception.

These include replacement of an intersection with an interchange, channelization, and medians. The local government must identify reasonable build design alternatives, assess their impacts, and select the alternative with the least impact. In addition TPR Section – 0065states, (5) For transportation uses or improvements listed in subsection (3)(d) to (g) and (o) of this rule within an exclusive farm use (EFU) or forest zone, a jurisdiction shall, in addition to demonstrating compliance with the requirements of ORS 215.296:

- (a) Identify reasonable build design alternatives, such as alternative alignments, that are safe and can be constructed at a reasonable cost, not considering raw land costs, with available technology. The jurisdiction need not consider alternatives that are inconsistent with applicable standards or not approved by a registered professional engineer,
- (b) Assess the effects of the identified alternatives on farm and forest practices, considering impacts to farm and forest lands, structures and facilities, considering the effects on traffic on the movement of farm and forest vehicles

and equipment and considering the effects of access to parcels created on farm and forest lands; and

- (c) Select from the identified alternatives, the one, or combination of identified alternatives that has the least impact on the lands in the immediate vicinity devoted to farm or forest use.

Finding: *The Sunrise Expressway interchanges were jointly developed by ODOT, the City of Happy Valley and Damascus and Clackamas County. Policy language contained in the IAMPs mandate continued coordination between the agencies for management of the interchange areas. Current and future planned land uses were considered in the design of the interchanges in order to ensure their ability to support future traffic demands. Policies within the IAMPs are intended to manage land uses around the interchanges to avoid unplanned growth and development that may impact the function of the facilities. The policies also require that plan amendments and zone changes within the IAMP study areas must not result in a significant impact on the interchange facilities. If a significant impact is expected, then the IAMPs must be amended and mitigation strategies, including funding plans, must be adopted.*

Appendix D of the IAMP describe the alternative development and analysis and the selection of the preferred alternative interchange concepts that address ORS 215.296.

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

OAR 731-015-0065(1) requires ODOT to involve DLCD and affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and other interested parties in the development or amendment of a facility plan. This involvement may take the form of mailings, meetings or other means that the Department determines are appropriate for the circumstances. The Department shall hold at least one public meeting on the plan prior to adoption.

Finding: *731-015-0065 (1) The Sunrise Expressway IAMPs were developed jointly by ODOT, Clackamas County and the Cities of Happy Valley and Damascus, and included coordination with DLCD primarily through requests for review of DRAFT materials. The final public meeting for the Sunrise Expressway IAMPs was held in the Fall of 2009. In addition, a series of twenty-eight public meetings were held from Winter of 2008 to Fall 2009 to discuss the Sunrise Expressway interchanges. A summary of the public involvement process is included in Appendix E.*

(2) The Department shall provide a draft of the proposed facility plan to planning representatives of all affected cities, counties and metropolitan planning organization and shall request that they identify any specific plan requirements which apply, any general plan requirements which apply and whether the draft facility plan is compatible with the acknowledged comprehensive plan. If no reply is received from an affected city, county or metropolitan planning organization within 30 days of the Department's request for a compatibility determination, the Department shall deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan. The Department may extend the reply time if requested to do so by an affected city, county or metropolitan planning organization.

731-015-0065 (2) A final draft of the IAMPs have been provided to Clackamas County and the Cities of Happy Valley and Damascus, The Department of Justice and the Department of Land Conservation and Development, as well as to other units within ODOT, so that any potential conflicts with state or local plans will be jointly resolved, in March 2011.

(3) If any statewide goal or comprehensive plan conflicts are identified, the Department shall meet with the local government planning representatives to discuss ways to resolve the conflicts.

731-015-0065 (3) The Sunrise Expressway IAMPs were developed jointly by ODOT, Clackamas County and the Cities of Happy Valley and Damascus, and included coordination with DLCD primarily through project team meetings. At these meeting the agencies worked to resolve and eliminate conflicts with local comprehensive plans.

(4) The Department shall evaluate and write draft findings of compatibility with acknowledged comprehensive plans of affected cities and counties, findings of compliance with any statewide planning goals which specifically apply as determined by OAR 660-030-0065(3)(d), and findings of compliance with all provisions of other statewide planning goals that can be clearly defined if the comprehensive plan of an affected city or county contains no conditions specifically applicable or any general provisions, purposes or objectives that would be substantially affected by the facility plan.

731-015-0065 (4) Findings of compliance with statewide planning goals and compatibility with local comprehensive plans have been completed and are included here.

(5) The Department shall present to the Transportation Commission the draft plan, findings of compatibility with the acknowledged comprehensive plans of affecting cities and counties and findings of compliance with applicable statewide planning goals.

731-015-0065 (5) Findings of compliance with statewide planning goals and compatibility with local comprehensive plans will be included in materials for presentation to the Oregon Transportation Commission. Adoption of the IAMPs and findings will take place in conformance with this provision. Local plans have been updated to be compliant with the IAMP. Clackamas County adopted new Comprehensive Plan language in August, 2010. The City of Happy Valley adopted new language on January 18, 2011. The City of Damascus does not yet have an acknowledged Comprehensive Plan, but the City has provided ODOT a Letter of Support concerning the Rock Creek Junction IAMP.

(6) The Transportation Commission shall adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties and findings of compliance with applicable statewide planning goals when it adopts the final facility plan.

731-015-0065 (6) The Oregon Transportation Commission will adopt these findings concurrent with adoption of the IAMPs.

(7) The Department shall provide copies of the adopted final facility plan and findings to DLCD, to affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and to others who request to receive a copy.

731-015-0065 (7) Subsequent to OTC adoption of the IAMPs ODOT will provide copies of the IAMPs and facility plans and findings to DLCD, the Cities of Happy Valley and Damascus, Clackamas County, Metro, Department of Justice, Department of Land Conservation and Development, ODOT and Federal Highways and others who request copies.

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.

Specifically, 734-051-0125 states that access management spacing standards for approaches:

1. Be developed no later than the time the interchange is being developed or redeveloped-0155(7)(a.)
2. Identify opportunities to improve operations and safety in conjunction with roadway projects and property development or redevelopment and adopt strategies and development standards to capture those opportunities-0155(7)(b).
3. Include short and long-term actions to improve operations and safety in the interchange area -0155(7)(c).
4. Consider current and future traffic volumes and flows, roadway geometry, traffic control devices, current and planned land uses and zoning, and the location of all current and planned approaches -0155(7)(d).

5. Provide adequate assurance of the safe operation of the facility through the design traffic forecast period, typically 20 years-0155(7)(e).
6. Consider existing and proposed uses of all property in the interchange area consistent with its comprehensive plan designations and zoning -155(7)(f).
7. Be consistent with any applicable access management plan, corridor plan, or facility plan adopted by the OTC. -155(7)(g).
8. Include polices, provisions and standards from local comprehensive plans, transportation system plans, and land use and subdivision codes that are relied upon for consistency and that are relied upon to implement the Interchange Area Management Plan. -155(7)(h).

Finding:

1. *These plans were produced during the planning and design process for the Sunrise Expressway. They are also being adopted in advance of final plans and construction.*
2. *The land use controls and access management elements identified in these plans and incorporated into the project design or identified for implementation with future property redevelopment or project development activities, will constitute significant operational and safety improvements.*
3. *Short and long-term actions to improve operations and safety in the interchange areas have been identified. Short-term actions include those that will occur with construction of the interchanges. Long-term actions are designated in the County and Cities' TSPs for improvements to the local circulation network.*
4. *A full analysis of existing and forecast (2030) operational, geometric, and safety conditions was conducted. Future land use development within Clackamas County and the cities of Happy Valley and Damascus influence areas was identified, as were all affected accesses. These elements led to the plan's transportation improvement project recommendations and detailed access management plans for the interchange study areas.*
5. *The transportation recommendations were developed based on a long-term (2030) forecast traffic operations analysis. The improvement projects described in the IAMPs will ensure the safe and efficient operation of the interchanges through the planning horizon year.*
6. *An analysis of the interchange influence areas and Their long-term development potential was included in the planning effort. This analysis resulted in recommendations for the interchange improvements to ensure the long-term function of the interchange areas.*

7. *The Sunrise Expressway Interchange Area Management Plans are consistent with the 1999 OHP and consistent with the applicable access management polices, principles, and standards.*
8. *The Sunrise Expressway Interchange Area Management Plans contain references to, and are consistent with the polices, operational standards, and access management standards of Clackamas County and the cities of Happy Valley and Damascus, and ODOT.*

The Sunrise Expressway IAMPs have adequately addressed OAR 734, Division 51. Highway Approaches, Access Control, Spacing Standards and Medians.

Metro's Role in Land Use Planning

Metro is responsible for a number of regional land use planning functions, including all adjustments to the UGB and related activities. Metro's land use planning functions support the assumptions behind the UGB and RTP.

Metro's Role in Transportation Planning

Metro is the regional government responsible for regional transportation planning under state law and is the federally-designated metropolitan planning organization (MPO) for the Portland metropolitan area. As the federally designated MPO, Metro guides regional transportation system planning and development in the Portland metropolitan area. Metro is also responsible for developing a regional transportation system plan (TSP), consistent with Oregon Transportation Planning Rule (TPR) requirements and Federal planning rules.

Metro's Regional Framework Plan

The Regional Framework Plan unites all of Metro's adopted land use planning policies and requirements. The Metro Charter directs the agency to address the following subjects in the Plan:

- Management and amendment of the Urban Growth Boundary
- Protection of lands outside the Urban Growth Boundary for natural resource use and conservation, future urban expansion or other uses
- Urban design and settlement patterns
- Housing densities
- Transportation and mass transit systems
- Parks, open spaces and recreational facilities
- Water sources and storage
- Coordination with Clark County, Washington
- Planning responsibilities mandated by state law
- Other issues of metropolitan concern

Metro's Regional Framework Plan can be accessed in its entirety through this link:

<http://www.oregonmetro.gov/index.cfm/go/by.web/id=432>).

Regional Framework Plan Structure

Each chapter of this Plan contains an introduction followed by a list of relevant Fundamentals. Fundamentals are eight value statements adopted by the Metro Council that synthesize the 2040 Growth Concept and regional policies and are listed below:

- Fundamental 1:** Encourage a strong local economy by providing an orderly and efficient use of land, balancing economic growth around the region and supporting high quality education.
- Fundamental 2:** Encourage the efficient use of land within the UGB including buildable industrial and commercial land and focus development in 2040 mixed use centers and corridors.
- Fundamental 3:** Protect and restore the natural environment including fish and wildlife habitat, streams and wetlands, surface and ground water quality and quantity, and air quality.
- Fundamental 4:** Provide a balanced transportation system including safe, attractive facilities for bicycling, walking and transit as well as for motor vehicles and freight.
- Fundamental 5:** Maintain separation between the Metro UGB and neighboring cities by working actively with these cities and their respective counties.
- Fundamental 6:** Enable communities inside the Metro UGB to enhance their physical sense of place by using among other tools, greenways, natural areas, and built environment elements.
- Fundamental 7:** Enable communities to provide diverse housing options for all residents by providing a mix of housing types as well as affordable homes in every jurisdiction.
- Fundamental 8:** Create a vibrant place to live and work by providing sufficient and accessible parks and natural areas, improving access to community resources such as schools, community centers and libraries as well as by balancing the distribution of high quality jobs throughout the region, and providing attractive facilities for cultural and artistic performances and supporting arts and cultural organizations.

These Fundamentals are followed by policies of the Metro Council. Chapters 1 through 6 address substantive planning policies. Chapter 7 addresses how Metro will manage the plan and amendments to the plan. Chapter 8 addresses how the plan policies are to be implemented. Related documents and background information are contained in Appendices.

Policies – Chapter 1, Land Use

- 1.1 Urban Form
- 1.2 Built Environment
- 1.3 Housing Choice
- 1.4 Economic Opportunity

- 1.5 Economic Vitality
- 1.6 Growth Management
- 1.7 Urban/Rural Transition
- 1.8 Developed Urban Land
- 1.9 Urban Growth Boundary
- 1.10 Urban Design
- 1.11 Neighbor Cities
- 1.12 Protection of Agriculture and Forest Resource Lands
- 1.13 Participation of Citizens
- 1.14 School and Local Government Plan and Policy Coordination
- 1.15 Centers
- 1.16 Residential Neighborhoods

***Finding:** The Sunrise Expressway IAMPs contain no policies or actions that would limit Metro from carrying out policies identified in Chapter 1 of the Regional Framework Plan. In fact, the IAMPs contribute positively to many of the land use policies identified in the Regional Framework Plan.*

Policies – Chapter 2, Transportation

- 2.1 Public Involvement
- 2.2 Intergovernmental Coordination
- 2.3 Urban Form
- 2.4 Consistency Between Land Use and Transportation Planning
- 2.5 Barrier-Free Transportation
- 2.6 Interim Job Access and Reverse Commute Policy
- 2.7 Transportation Safety and Education
- 2.8 The Natural Environment
- 2.9 Water Quality
- 2.10 Clean Air
- 2.11 Energy Efficiency
- 2.12 Regional Street Design
- 2.13 Local Street Design
- 2.14 Regional Motor Vehicle System
- 2.15 Regional Public Transportation System
- 2.16 Public Transportation Awareness and Education
- 2.17 Public Transportation Safety and Environmental Impacts
- 2.18 Regional Public Transportation Performance
- 2.19 Special Needs Public Transportation
- 2.20 Regional Freight System
- 2.21 Regional Freight System Investments
- 2.22 Regional Bicycle System Connectivity
- 2.23 Regional Bicycle System Mode Share and Accessibility
- 2.24 Regional Pedestrian System
- 2.25 Regional Pedestrian Mode Share
- 2.26 Regional Pedestrian Access and Connectivity

- 2.27 Transportation System Management
- 2.28 Regional Transportation Demand Management
- 2.29 Regional Parking Management
- 2.30 Peak Period Pricing
- 2.31 Transportation Funding
- 2.32 2040 Growth Concept Implementation
- 2.33 Transportation System Maintenance and Preservation
- 2.34 Transportation Safety

Finding: *The Sunrise Expressway IAMPs contain no policies or actions that would limit Metro from carrying out policies identified in Chapter 2 of the Regional Framework Plan. In fact, the IAMPs contribute positively to many of the transportation policies identified in the Regional Framework Plan.*

Policies – Chapter 3, Nature in Neighborhoods

- 3.1 Inventory of Park Facilities and Identification and Inventory of Regionally Significant Parks, Natural Areas, Open Spaces, Fish and Wildlife Habitat, Trails and Greenways
- 3.2 Protection of Regionally Significant Parks, Natural Areas, Open Spaces, Fish and Wildlife Habitat, Trails and Greenways
- 3.3 Management of the Publicly-Owned Portion of the Regional System of Parks, Natural Areas, Open Spaces, Fish and Wildlife Habitat, Trails and Greenways
- 3.4 Protection, Establishment and Management of a Regional Trails System
- 3.5 Provision of Community and Neighborhood Parks, Open Spaces, Fish and Wildlife Habitat, Natural Areas, Trails and Recreation Programs
- 3.6 Participation of Citizens in Environmental Education, Planning, Stewardship Activities, and Recreational Services

Finding: *Chapter 3 of the Regional Framework Plan is not applicable to the Sunrise Expressway IAMPs. The IAMPs PMT coordinated with Metro Greenspaces staff regarding proposed recreational trails in project area to ensure compatibility with design of Sunrise Expressway, and to avoid severing of planned trails. The IAMPs contain no policies that would preclude Metro from carrying out policies in this chapter for the acquisition of parks and open spaces.*

Policies – Chapter 4, Watershed Health and Water Quality

- 4.1 Water Supply
- 4.2 Overall Watershed Management
- 4.3 Water Quality
- 4.4 Stormwater Management
- 4.5 Urban Planning and Natural Systems

Finding: *Chapter 4 of the Regional Framework Plan is not directly applicable to the Sunrise Expressway IAMPs because the chapter addresses how Metro is to plan for watershed health and water quality. The Sunrise Expressway IAMPs will not prohibit Metro from implementing Policies in Chapter 4 of the Regional Framework Plan.*

Policies – Chapter 5, Regional Natural Hazards

- 5.1 Earthquake Hazard Mitigation Measures
- 5.2 Flood Hazard Mitigation Measures
- 5.3 Landslide Hazard Mitigation Measures
- 5.4 Volcanic Hazard Mitigation Measures
- 5.5 Wildland-Urban Interface Fire Mitigation Measures
- 5.6 Severe Weather Hazard Mitigation Measures
- 5.7 Biological Hazard Mitigation Measures
- 5.8 Other Hazard Mitigation Measures
- 5.9 Natural Disaster Response Coordination

***Finding:** Chapter 5 of the Regional Framework Plan is not directly applicable to the Sunrise Expressway IAMPs because the chapter addresses how Metro is to plan for the future with consideration given to natural hazards.*

Policies – Chapter 6, Clark County

- 6.1 Coordination with Clark County

***Finding:** Chapter 6 of the Regional Framework Plan is not applicable to the Sunrise Expressway interchanges as they are far removed from Clark County, Washington.*

Policies – Chapter 7, Management

- 7.1 Citizen Participation
- 7.2 Metro Policy Advisory Committee and Joint Policy Advisory Committee on Transportation
- 7.3 Applicability of Regional Framework Plan Policies
- 7.4 Urban Growth Boundary Management Plan
- 7.5 Functional Plans
- 7.6 Periodic Review of Comprehensive Land Use Plans
- 7.7 Implementation Roles
- 7.8 Performance Measures
- 7.9 Monitoring and Updating
- 7.10 Environmental Education

***Finding:** Policies contained in Chapter 7 of the Regional Framework Plan are not applicable to the Sunrise Expressway IAMPs as the chapter addresses how the Regional Framework Plan is updated and how conflicts between policies are resolved.*

Policies – Chapter 8, Implementation

- 8.1 Implementation
- 8.2 Regional Funding and Fiscal Policy
- 8.3 Schools
- 8.4 Administration
- 8.5 Enforcement

***Finding:** Policies contained in Chapter 8 of the Regional Framework Plan are not applicable to the Sunrise Expressway IAMPs as the chapter addresses how the Regional Framework Plan is implemented. There are no policies in the IAMPs that contradict policies in Chapter 8 of the Regional Framework Plan.*

Metro Urban Growth Management Functional Plan

The regional policies which are adopted by this Urban Growth Management Functional Plan recommend and require changes to city and county comprehensive plans and implementing ordinances. The purpose of this functional plan is to implement regional goals and objectives adopted by the Metro Council as the Regional Urban Growth Goals and Objectives (RUGGO), including the Metro 2040 Growth Concept and the Regional Framework Plan. The comprehensive plan changes and related actions, including implementing regulations, required by this functional plan as a component of the Regional Framework Plan, shall be complied with by cities and counties as required by Section 5(e)(2) of the Metro Charter. Any city or county determination not to incorporate all required functional plan policies into comprehensive plans shall be subject to the conflict resolution and mediation processes included within the RUGGO, Goal I provisions, prior to the final adoption of inconsistent policies or actions.

The regional policies adopted in this Urban Growth Management Functional Plan are formulated from, and are consistent with, the RUGGOs, including the Metro 2040 Growth Concept. The overall principles of the Greenspaces Master Plan are also incorporated within this functional plan. In addition, the updated Regional Transportation Plan (RTP) , when adopted, will serve as the primary transportation policy implementation of the 2040 Growth Concept. However, early implementation land use policies in this functional plan are integrated with early implementation transportation policies derived from preparation of the 1996 Regional Transportation Plan, and consistent with the Metro 2040 Growth Concept.

The Urban Growth Management Functional Plan is a regional functional plan which contains "requirements" that are binding on cities and counties of the region as well as recommendations that are not binding. Shall" or other directive words are used with requirements. The words "should" or "may" are used with recommendations. In general, the plan is structured so that local jurisdictions may choose either performance standard requirements or prescriptive requirements. The intent of the requirements is to assure that cities and counties have a significant amount of flexibility as to how they meet requirements. Performance standards are included in most titles. If local jurisdictions demonstrate to Metro that they meet the performance standard, they have met that requirement of the title. Standard methods of compliance are also included in the plan to establish one very specific way that jurisdictions may meet a title requirement, but these standard methods are not the only way a city or county may show compliance. In addition, certain mandatory requirements that apply to all cities and counties are established by this functional plan.

There are 13 titles (Chapters) to the Urban Growth Management Functional Plan. They are as follows:

TITLE 1: REQUIREMENTS FOR HOUSING AND EMPLOYMENT ACCOMMODATION

Title 1 directs each city and county in the region to consider actions to increase its capacity and to take action if necessary to accommodate its share of regional growth as specified in this title.

Finding: *The Sunrise Expressway project does remove land from the inventory of land that could be used for additional housing and employment, however, the facilities have been in local and regional plans for more than a decade so the land used to site the interchanges were never in the land inventory to provide for increased housing and employment accommodation.*

TITLE 2: REGIONAL PARKING POLICY (Repealed Ord. 10-1241B, § 6)

TITLE 3: WATER QUALITY and FLOOD MANAGEMENT

To protect the beneficial water uses and functions and values of resources within the Water Quality and Flood Management Areas by limiting or mitigating the impact on these areas from development activities and protecting life and property from dangers associated with flooding.

Finding: *Water resources in the corridor were evaluated in the Sunrise Project SDEIS. The IAMPs for Sunrise Expressway do not conflict with the protection of water resources.*

TITLE 4: INDUSTRIAL AND OTHER EMPLOYMENT AREAS

Title 4 seeks to provide and protect a supply of sites for employment by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs), Industrial and Employment Areas. Title 4 also seeks to provide the benefits of "clustering" to those industries that operate more productively and efficiently in proximity to one another than in dispersed locations. Title 4 further seeks to protect the capacity and efficiency of the region's transportation system for the movement of goods and services and to encourage the location of other types of employment in Centers, Employment Areas, Corridors, Main Streets and Station Communities.

Finding: *The Sunrise Expressway interchanges facilitate and accommodate freight access to a Regionally Significant Industrial Area, as well as the existing Clackamas Industrial Area.*

TITLE 5: NEIGHBOR CITIES AND RURAL RESERVES (Repealed, Ord. 10-1238A, § 4)

TITLE 6: CENTRAL CITY, REGIONAL CENTERS, TOWN CENTERS AND STATION COMMUNITIES

Title 6 intends to enhance Centers by encouraging development in these Centers that will improve the critical roles they play in the region and by discouraging development outside Centers that will detract from those roles.

Finding: Title 6 is not applicable to the Sunrise Expressway IAMPs as there are no Centers located in the vicinity of the interchange management areas.

TITLE 7: HOUSING CHOICE

The intent of Title 7 is to establish and promote voluntary affordable housing production goals.

Finding: The Sunrise Expressway IAMPs do not directly inhibit the cities of Happy Valley and Damascus and Clackamas County from providing affordable housing. The interchanges do remove some land from the land inventory that could otherwise be used to provide for housing.

TITLE 8: COMPLIANCE PROCEDURES

The purpose of this section is to establish a process for determining whether city or county comprehensive plans and land use regulations comply with requirements of the Urban Growth Management Functional Plan.

Finding: This Title is not applicable.

TITLE 9: PERFORMANCE MEASURES

In order to monitor progress in implementation of the Urban Growth Management Functional Plan and to evaluate and improve the plan over time, Metro shall measure and report on progress toward achievement and expected outcomes resulting from the implementation of the functional plan.

Finding: This Title is not applicable.

TITLE 10: FUNCTIONAL PLAN DEFINITIONS

Finding: This Title is not applicable.

TITLE 11: PLANNING FOR NEW URBAN AREAS

The purpose of Title 11 to guide such long-range planning for urban reserves and areas added to the UGB. It is also the purpose of Title 11 to provide interim protection for areas added to the UGB until city or county amendments to land use regulations to allow urbanization become applicable to the areas.

Finding: This Title is not applicable.

TITLE 12: PROTECTION OF RESIDENTIAL NEIGHBORHOODS

The purpose of Title 12 is to help implement the policy of the Regional Framework Plan to protect existing residential neighborhoods from air and water pollution, noise and crime and to provide adequate levels of public services.

Finding: There are residential neighborhoods to the south, west, north and east of the Sunrise Expressway interchanges, however, the interchanges do not impact these residential areas to any extent greater than any other land use. The Sunrise Expressway was planned to reduce impacts to residential neighborhoods so much so

that no residential neighborhoods are bisected by the Sunrise Expressway alignment, or the associated interchanges.

During construction, the project will comply with Clackamas County noise regulations and ODOT Standard Specifications to minimize construction impacts. In addition, seven sound walls are recommended for inclusion in the project.

TITLE 13: NATURE IN NEIGHBORHOODS

The purposes of this program are to (1) conserve, protect, and restore a continuous ecologically viable streamside corridor system, from the streams' headwaters to their confluence with other streams and rivers, and with their floodplains in a manner that is integrated with upland wildlife habitat and with the surrounding urban landscape; and (2) to control and prevent water pollution for the protection of the public health and safety, and to maintain and improve water quality throughout the region.

Finding: *This Title is not applicable.*

Metro's Urban Growth Management Functional Plan can be accessed in its entirety through the following link:

http://library.oregonmetro.gov/files//chap307.reserves.rtfp_clean_eff.090810.02.pdf

Regional Transportation Plan (2007)

According to state law, the Regional Transportation Plan (RTP) serves as the region's TSP. The RTP is the 20-year blueprint that guides investment in the region's transportation system. It must meet federal requirements specific to the metropolitan transportation planning process and also be consistent with state plans and the statewide planning goals. For transportation projects and programs to receive federal – and some state – funding, they must be in the RTP, and local plans must be consistent with the RTP. Clackamas County and the cities of Happy Valley and Damascus coordinate with Metro's other cities, counties and transit providers in regional transportation planning related to the RTP.

The RTP establishes policies and strategies for all modes of travel – motor vehicles, transit, walking and bicycling – as well as the movement of freight and goods. The RTP also addresses street design and the efficient management of the transportation system.

The 2030 RTP update is being conducted as part of the New Look at regional choices to support the land use, economic, environmental and transportation goals of the Region 2040 Growth Concept (see below). The plan identifies goals, objectives, transportation investments and actions needed throughout the region to implement the 2040 Growth Concept and address the impacts of future growth on our transportation system through the year 2030. The update prioritizes transportation investments that best help us reach our 2040 vision for growth, yet remain within expected funding constraints.

Elements of the RTP: Regional Transportation System

Regional multi-modal transportation facilities and services include eight components: Regional Street and Throughway System; Regional Transit System; Regional Bicycle System; Regional Pedestrian System; Regional Freight System; Regional Design System; System Management Strategies and Demand Management Strategies.

Elements of the RTP: Regional Street and Throughway System

The **Regional Street and Throughway System** seeks to apply a regularly spaced street network design to accommodate travel demands of the region. **Throughways** connect major activity centers within the region, including the central city, regional centers, industrial areas and intermodal facilities. They generally span several jurisdictions and often are of statewide importance linking the Metro area with neighboring cities, other parts of the state, and beyond. Throughway interchanges are spaced no less than two miles apart.

***Finding:** The Sunrise Project, which includes the Sunrise Expressway IAMPs, is identified in the RTP, and designated as a Planned Principal Arterial (highway).*

Elements of the RTP: Regional Mobility Corridors

The regional mobility corridor concept is a sub-section of the regional street and throughway network concept that integrates arterial streets and throughways, as well as transit and other modes, into corridors that work together to provide for cross-regional, statewide and interstate travel. This corridor approach considers multiple facilities, modes, jurisdictions, and land uses.

The Sunrise Corridor project (partially overlapping with Highway 212/224) is identified in the RTP, and is illustrated as a regional corridor on the Regional Mobility Corridors map (Figure 4).

***Finding:** The RTP identifies and designates the Sunrise Project as a Regional Mobility Corridor.*

Elements of the RTP: Local Streets Network Concept

Collector and local streets are general access facilities that provide for community and neighborhood circulation. Although they are not part of the regional transportation system, they play an important supporting role to the design and optimization of the regional transportation system.

Local jurisdictions are responsible for defining the network of local streets within a mile-spacing grid of arterial streets. Since the late 1990s, the region has required a maximum spacing of 1/10 mile for local streets, with the goal of encouraging local traffic to use local streets to minimize local traffic on regional arterial streets. Local street connectivity also benefits emergency response.

The local street network concept provides for bicycle and pedestrian travel and provides for direct access from local street systems to community destinations and transit on regional arterial streets. More frequent bike and pedestrian connections are

recommended where collector and local streets cannot be constructed due to existing development or topographic or environmental constraints.

The IAMPs analyzed the local street network, and modifications to the system were proposed.

Finding: *The Sunrise Expressway IAMPs examine how best to integrate the Sunrise Expressway and its interchanges with adjacent local streets, to enhance local access and connectivity in the study area. The IAMP work is coordinated with on-going TSP work in Clackamas County and the cities of Happy Valley and Damascus, to ensure safe and convenient traffic operations in the interchange study areas.*

Elements of the RTP: Regional Freight System

The Regional Freight System identifies the transportation networks and facilities that serve our region and state's freight mobility needs, based on the regional freight concept.

Since the Sunrise Corridor project provides enhanced access to a major freight distribution center, the Regional Freight System standards must be addressed in the IAMP.

Finding: *The Sunrise Project is identified in the RTP, and designated as a Main Roadway Route on the Regional Freight System.*

Elements of the RTP: 2030 RTP Investment Pool

The 2030 RTP Investment Pool describes the projects and programs identified by local agencies, ODOT, TriMet and Metro to address the impacts of future growth on our regional transportation system.

State and Regional Mobility Corridor Investment Strategy focuses on regional mobility corridor investments that leverage the 2040 Growth Concept and improve interstate, intrastate and cross-regional people and goods movement. These corridors are the backbone of the regional transportation system because of their statewide significance and the magnitude of costs associated with providing for people and goods movement in these corridors.

Examples of the types of projects include:

- *Freight access and connections.* Rail and street expansions to maintain access and connections for national and international rail, air and marine freight to reach its destination with limited delay.
- *Throughway expansion.* Major throughway expansions to maintain regional mobility and enhance access to intermodal industrial areas and facilities where goods move from one transportation mode to another.

Finding: *The Sunrise Project is identified in the first round of RTP analysis for a phase of construction: a mainline connection from I-205 to 122nd Avenue. Construction of elements of the West interchange is part of this segment.*

Elements of the RTP: Financially Constrained RTP Project List

The **financially constrained system** is the system of investments that responds to federal planning requirements, and is based on the financial forecast. The Sunrise Expressway interchange is a component of the Sunrise Project, which is on Financially Constrained RTP Project List.

***Finding:** Components of the Sunrise Project, including expressway mainline, interchanges, and associated local street improvements designed to complement the Sunrise Expressway, and enhance local access and connectivity, have been identified in the RTP financially-constrained project list.*

Clackamas County Comprehensive Plan

Clackamas County's Comprehensive Plan, was originally adopted in 1974, with major updates in 1980 and 1992. In addition, revisions to the plan text and maps have been made periodically in response to an opportunity, or a state, federal or regional requirement. The Comprehensive Plan is available on the county's website:

[\(http://www.clackamas.us/transportation/planning/comprehensive/\)](http://www.clackamas.us/transportation/planning/comprehensive/)

Clackamas County's Comprehensive Plan has eleven chapters, roughly organized according to the state goals and guidelines that the plan was developed to implement. Two chapters of the Comprehensive Plan include policy language that must be addressed by the Sunrise Expressway IAMPs:

Chapter 4: Land Use

Chapter 5: Transportation

Chapter 4 of the Comprehensive Plan: Land Use

Chapter 4 lays out Goals and Policies for land use and includes specific policy language for broad categories of land use and specific Comprehensive Plan designations. The following Clackamas County Comprehensive Plan designations are applied within the Sunrise Sunrise Expressway IAMP areas:

- Agriculture
- Low Density Residential
- Medium Density Residential
- Low Density Residential
- Community Commercial
- General Industrial

Appendix B of the IAMP, describes in detail County land uses.

The following Policies are applicable to the Sunrise Expressway IAMPs:

3.0 Land use planning for urban areas shall integrate all applicable policies found throughout the Plan including the following:

- a Locate land uses of higher density or intensity to increase the effectiveness of transportation and other public facility investments.
- b Encourage infilling of Immediate Urban Areas with a minimum of disruption of existing neighborhoods (see infill policies in the Housing Chapter).
- c Enhance energy conservation and transportation system efficiency by locating opportunities for housing near work and shopping areas.
- d Integrate developments combining retailing, office, and medium and high density housing at places with frequent transit service and pedestrian facilities.

Finding: *The proposed interchanges addressed by the IAMPs and the IAMP policies were developed to serve land uses in the vicinity of the interchanges. Because the Sunrise Expressway interchanges are entirely within the UGB, it is likely that remaining agricultural uses in IAMP areas will eventually convert to more urban uses. While agricultural uses still exist within the Rock Creek Junction IAMP, there is no land zoned for agricultural use and the current uses is remnant of former Clackamas County zoning, before the area was brought into the UGB.*

Chapter 5 of the Comprehensive Plan: Transportation (TSP)

Clackamas County Transportation Systems Plan

Clackamas County’s TSP was adopted in 1999 and contains a section of goals and policies for roads, land use and transportation. Policies that are relevant to the Sunrise Expressway IAMPs are addressed below.

Roadways

This sub-section of Chapter 5 addresses roads in the county. Goals in this section that apply to the Sunrise Expressway IAMPs include:

- Create and maintain a safe, continuous County-wide road system that accommodates movement by all travel modes.
- Meet the future transportation demands of the County.
- Complement the transportation networks of cities, other counties and the State.

Finding: *Roadways in the interchange management areas under Clackamas County jurisdiction will be managed according to the County’s Roadway Standards, which govern cross-sections, access spacing, etc.*

Functional Classifications and Roadway Standards

- 9.0 Designate and develop roadways according to the functional classifications and guidelines listed while allowing flexibility to accommodate characteristics of terrain, scenic qualities, and existing development.
- 10.0 Designate freeways, arterials, collectors and connectors as shown in the TSP.
- 11.0 Limit zone change approvals to those that will not require a roadway as planned in the Capital Improvement Plan to be redesigned or increased to a higher functional classification in order to maintain the minimum acceptable performance evaluation

Level-of-Service standard. State transportation facilities shall be evaluated according to the Oregon Highway Plan.

- 12.0 The County shall consider the Regional Street Design Type Guidelines when designing new county roads or redesigning existing county roads prior to construction or reconstruction. Map V-3 shows which roads are designated by each Design Type.
- 13.0 Design arterials and collectors to allow safe and convenient passage of buses in urban areas and, where necessary, rural areas.

Finding: *The “Functional Classification and Roadway Standards” section includes “Table V-4 Regional Street Design Types” which identify regional street classifications and specify design guidelines for each street type. The Sunrise Expressway IAMP areas provide a range of roadway functional classifications, and appropriate roadway standards, to adequately serve travel demand.*

Access Standards

County access policies include:

- 14.0 Plan and control access onto roads within the County, as shown on Table V-5, for urban areas for both new and existing uses, and coordinate with the Oregon Department of Transportation for access control on state highways. Access standards need to be applied in a flexible manner that maintains reasonable access to property when access cannot be denied.

Finding: *The “Access Standards” section includes “Table V-5 Clackamas County Access Requirements by Functional Classification, Urban Areas Only” which identify access guidelines by county functional classification (Table 5). These standards apply to all County road facilities within the interchange management areas. County TSP directs coordination with ODOT for access control on state highways as stated in the policy above.*

Operating Standards

Policies in the “Operating Standards” section include:

- 28.0 All arterials and collectors not in Regional Centers shall be evaluated for performance to Level-of-Service “D” as the acceptable operating standard, except as established below. All capital construction shall be designed to achieve Level-of-Service “D” or better. (4/28/05)
- a. Review of high-employment developments shall use a performance evaluation operating standard of Level-of-Service “E”.
 - b. Review of developments proposed on property with a Comprehensive Plan designation of Business Park, Light Industrial, [or] General Industrial shall use a performance evaluation operating standard of Level-of-Service “E”, except within the Clackamas Industrial Area where no performance evaluation operating standard shall apply.

29.0 Limit zone change approvals to those that will not reduce the Level of Service of a roadway as planned in the Capital Improvement Plan below the minimum acceptable performance evaluation Level-of-Service standard. State facilities shall be evaluated according to the Oregon Highway Plan.

Finding: *TSP identifies acceptable operating standards of LOS “D” and “E” (in high employment areas) for County arterials and collectors, and accepts appropriate LOS standards, as defined in Oregon Highway Plan, for state facilities. Restrictions on zone change approvals to those that will not reduce the LOS below acceptable performance evaluation LOS standards provide further protection to long-term operation of the Sunrise Expressway interchange.*

Building Roads

Policies in the “Building Roads” section include:

32.0 Streets and roads are an allowed use in all zoning districts. All state and County policies relating to roads shall be considered when widening or constructing new roads.

33.0 Consider all types of interchange designs when developing a freeway interchange project to maximize traffic flow, safety and efficiency.

34.0 Consider all transportation modes when building new roads or widening existing roads to maximize efficiency and safety for all users of the road.

Finding: *Multiple interchange designs were evaluated for the Sunrise Expressway IAMPs and in the Sunrise Project FEIS. A complex system interchange with two partial interchanges will facilitate traffic at the West end of the Sunrise Expressway, where it connects to I-205 and the Milwaukie Expressway. An urban diamond interchange was determined to maximize traffic flow, safety and efficiency for the Midpoint and a single-point urban interchange design was determined to maximize traffic flow, safety and efficiency for Rock Creek Junction. Roadway standards for new County, city and State facilities in IAMP areas provide for accommodation of bike and pedestrian modes.*

Transit

A sub-section of the Transportation Chapter of Clackamas County’s Comprehensive Plan addresses Transit as follows:

Transit service is essential for the mobility of many County residents, and provides an attractive option for others who prefer to use it. Tri Met, transit districts in Wilsonville, Molalla and Sandy, and each of the school districts operate buses on County roads, State highways, and city streets within the County. While the County provides no transit service directly, it has some influence over the type of service provided and the way new developments interface with transit and provide amenities for transit riders.

Transit policies that apply to the Sunrise Expressway IAMPs include those shown below.

Please note that Highway 212/224 and SE 82nd Avenue are designated as Planned Primary Bus Routes.

Standards and Criteria for Major Transit Streets and Major Transit Stops

- 15.0 Major Transit Streets, for the purpose of setting standards for orientation of development to transit, shall be those streets planned for High Capacity Transit and Primary Bus as shown on Map V-6, as well as any other street that receives 20 minute or better service at the PM traffic peak.
- 16.0 Major Transit Stops shall be any transit stop along a Major Transit Street where that stop is within 250 feet of the centerline of an intersection with a public or private street. Orientation of buildings to transit at Major Transit Stops shall be accomplished by siting new commercial buildings as close as possible to transit, with a door facing the transit street or side street, and with no parking between the building and front property lines.
- 17.0 Pedestrian access should be provided connecting transit centers or transit stops on bus routes, with centers of employment, shopping or medium to high density residential areas within one-quarter mile of these routes.

Finding: *One bus line currently serves SE 82nd Avenue, (OR 213N) and OR 212/224, through all three Interchange Areas – Route 30, Estacada. Another bus line serves SE 82nd Avenue and SE 82nd Drive – Route 79 Clackamas/Oregon City. The Sunrise Project proposes new express bus service on the Sunrise Expressway, between Clackamas Transit Center and Damascus Town Center. This new express service would run every 15 minutes during the peak hours, and every 60 minutes during the off-peak hours. The routing for this new express bus service on the Sunrise Expressway within the Sunrise Expressway IAMP areas will include a stop at the planned hospital site just north and east of the Rock Creek Junction interchange, near SE 162nd Avenue.*

Pedestrian and Bicycle Facilities

A sub-section of the Transportation Chapter of Clackamas County's Comprehensive Plan addresses pedestrian and bicycle facilities. The policies from this section that apply to the Sunrise Expressway IAMPs are as follows:

- 1.0 Provide networked systems of walkways and bikeways connecting neighborhoods, transit stops, commercial areas, community centers, schools, parks, libraries, employment places, other major destinations, regional bikeways and walkways, and other transportation modes.

Finding: *Roadway standards for new County and State facilities in IAMP areas provide for accommodation of bike and pedestrian modes. While pedestrian and bike access to the Sunrise Expressway will not be provided, a separated multi-use path alongside the Sunrise Expressway will be within the Sunrise Expressway IAMP areas. Local jurisdictional arterials and collectors within the IAMP areas will have sidewalks and bikeways.*

Freight, Rail, Air, Pipelines and Water Transportation

A sub-section of the Transportation Chapter of Clackamas County's Comprehensive Plan addresses freight, rail, air, pipelines and water transportation.

Freight Trucking

The Freight Trucking policies from this section that apply to the Sunrise Sunrise Expressway IAMPs Management Area include:

- 1.0 Maintain a truck circulation plan for movements of freight on arterial roads where minimum impact will occur to neighborhoods, and industrial areas will have the service they need.

The following streets are designated as Urban Area Freight Routes:

Highway 212/224 (OR 212/224)

Highway 212 (OR 212)

Sunrise Corridor

Happy Valley Comprehensive Plan and Development Code Designations

The Happy Valley land use planning system uses a single map system that serves as both the Comprehensive Plan Map and the Zoning Map. Thus, there are no broad comprehensive plan designations such as Residential, Commercial, Institutional, Parks and Open Space, etc. on a separate map – just the comprehensive plan map/zoning map districts that are reflected within the City's Development Code.

Happy Valley has applied the new Rock Creek Mixed Employment (RC-ME) Comprehensive Plan and Development Code designation to the majority of the incorporated IAMP area north of Highway 212 (Figure 6).¹ The RC-ME is an urban employment designation intended to accommodate a proposed medical complex. The RC-ME District is intended to be applied only to the Rock Creek Employment Area, which is located west of SE 162nd Avenue, north of Highway 212 and generally east of Rock Creek. If any other un-annexed property within this area were to seek annexation it would need to apply for a comprehensive plan map amendment/zone change to RC-ME, the only urban zone for which it would be eligible.

The purpose of the RC-ME District is to provide for a mix of land uses that provide stable, family-wage employment within the City. Permitted uses include offices, creative arts, small-scale manufacturing, research and development and medical centers. Commercial uses are limited to those serving the primary uses in the District.

Clackamas County comprehensive plan and zoning designations continue to be in place for those properties annexed by the city of Happy Valley but not included in the initial

¹ At the time of the proposal for the RC-ME designation, the three smaller properties along Highway 212 that are now in Happy Valley had not yet been annexed into the city. These properties will need to apply for a comprehensive plan map amendment/zone change to RC-ME.

area approved for the RC-ME zoning designation.

Properties south of Highway 212 and west of Highway 224 are outside Happy Valley's planned RC-ME area. Several development scenario options exist for properties in this area that have or will annex to Happy Valley: seek a comprehensive plan map amendment/zone change to a city zone; seek to develop/re-develop under the County zone via the City's land use process and development standards; or use an existing County land use approval but process building permits through the City. Currently, all of these parcels still maintain the Clackamas County comprehensive plan and zoning designations.

***Finding:** While the RC-ME zoning district is written broadly to allow a range of commercial, industrial, office/service, and institutional uses, it is primarily intended to allow, and support, a planned regional medical center/hospital in this area. The Sunrise Expressway Rock Creek junction interchange and IAMP are consistent with the land-use zoning designations.*

The RC-ME zoning ordinance has incorporated specific conditions on various commercial uses, to minimize its attraction to high-traffic generator land uses. These conditions include limits on the gross lease area of retail sales and personal service businesses/sites, as well as not permitting drive-thru facilities at restaurants.

Happy Valley Transportation System Plan (TSP), Adopted February 21, 2006

Happy Valley's Transportation System Plan (TSP) addresses existing and future facility needs for Pedestrian, Bicycle, Transit, Motor Vehicles and Other Modes of travel. The TSP also contains a table of transportation improvement needs for the next 20 years. The following elements from Happy Valley's TSP apply to the Sunrise Expressway IAMP Management Areas.

Chapter Five: Pedestrian Plan

The policies for pedestrian facilities are:

- Policy 1b: Encourage pedestrian accessibility by providing safe, secure and desirable pedestrian routes.
- Policy 3b: Sidewalks must be constructed on all streets within Happy Valley (with construction or reconstruction projects). All schools, parks, public facilities and retail areas shall have direct access to a sidewalk.
- Policy 3c: Bicycle and pedestrian plans shall be developed which link to existing and planned recreational trails.
- Policy 3g: Improve pedestrian access to transit as service demands increase in the future.
- Policy 3h: Pursue the expansion of the regional and local trail system with new development.

- Policy 3i: Implement regional alternative mode share targets to reduce the reliance on single-occupancy vehicles.
- Policy 3j: Neighborhoods shall be connected to minimize out of direction travel for pedestrians and bicycles. This is achieved with a well developed local street system and off-street trail system.
- Policy 4b: Safe and secure routes to schools shall be designated for each school and any new residential project shall identify the safe path to school for children.
- Policy 4c: Safe and secure pedestrian and bikeways shall be designed between parks and other activity centers in Happy Valley.
- Policy 6a: Design and construct transportation facilities to meet the requirements of the Americans with Disabilities Act.

Pedestrian Action Plan Projects

The Pedestrian Action Plan identifies projects that are reasonably expected to be funded by 2025, which meet the requirements of the updated TPR. There is one such project in the vicinity of the Sunrise Rock Creek Junction Management Area: SE 162nd Avenue Sidewalks -- construct sidewalks on both sides of the roadway from SE Clatsop Street to Hwy 212.

***Finding:** While no pedestrian access is allowed on the Sunrise Expressway, all local arterials that connect with the Sunrise Expressway interchanges will include sidewalks, as will all local jurisdictional arterials and collectors within the IAMP areas to provide for safe and convenient pedestrian accessibility. Happy Valley is updating its TSP to develop a local street network within the IAMP areas, which will include installation of sidewalks, and connections to proposed trails within the area, and to adjacent schools and parks.*

The policies for bicycle facilities are:

- Policy 3a: Bicycle lanes must be constructed on all arterials and collectors within Happy Valley (with construction or reconstruction projects). All schools, parks, public facilities and retail areas shall have direct access to a bikeway.
- Policy 3c: Bicycle and pedestrian plans shall be developed which link to existing and planned recreational trails.
- Policy 3h: The City will pursue the expansion of the regional and local trail system with new development.
- Policy 3i: Implement regional alternative mode share targets to reduce the reliance on single-occupancy vehicles.
- Policy 3j: Neighborhoods shall be connected to minimize out of direction travel for pedestrians and bicycles. This is achieved with a well developed local street system and off-street trail system.
- Policy 4c: Safe and secure pedestrian and bikeways shall be designed between

parks and other activity centers in Happy Valley.

Bicycle Action Plan Projects

There is one project listed in the Bicycle Action Plan that is located in the vicinity of the Sunrise Expressway Rock Creek junction Interchange Management Area: SE 162nd Avenue Bike Lanes -- construct bike lanes on both sides of the roadway from SE Monner Road to SE Clatsop Street and SE Sunnyside Road to Highway 212.

***Finding:** All local arterials that connect with the Sunrise Expressway interchanges will include bike lanes, as will all local jurisdictional arterials and collectors within the IAMP areas to provide for safe and convenient bicycle accessibility. Happy Valley is updating its TSP to develop a local street network within the IAMP areas, which will include installation of bike lanes on arterials and collectors, and connections to proposed nearby trails, adjacent schools and parks.*

Chapter Seven: Transit Plan

The policies for transit facilities are:

- Policy 3d: The City shall coordinate with Tri-Met to improve transit service in Happy Valley. Fixed route transit will use arterial and collector streets in Happy Valley. Park & Ride lots will be provided to accommodate concentrated transit demands where feasible.
- Policy 3g: Improve pedestrian access to transit as service demands increase in the future.
- Policy 3i: Implement regional alternative mode share targets to reduce the reliance on single-occupancy vehicles.
- Policy 6a: Design and construct transportation facilities to meet the requirements of the Americans with Disabilities Act.

Transit Master Plan Projects

There is one project listed in the Transit Master Plan that is located in the vicinity of the Sunrise Expressway interchange Management Area: Expand Bus Route #10 to serve future transit demand in Pleasant Valley, on SE 172nd Avenue and at the planned major employment center north of Highway 212.

Transit Action Plan Projects

A Transit System Action Plan project list identifies the following three items as those that are reasonably expected to be funded or implemented:

- Bus Stop Enhancements - coordinate with TriMet to provide transit stop amenities including bus shelters and street lighting at all transit stops.
- RTP Designated Major Transit Stops - to meet RTP requirements, amend development code regulations to require new retail, office, and institutional buildings on sites at major transit stops to:

- Locate buildings within 20 feet of or provide a pedestrian plaza at the major transit stops.
- Provide reasonably direct pedestrian connections between the transit stop and building entrances on the site.
- Provide a transit passenger landing pad accessible to disabled persons (if not already existing to transit agency standards).
- Provide an easement or dedication for a passenger shelter and underground utility connection from the new development to the transit amenity if requested by the public transit provider.
- Provide lighting at a transit stop (if not already existing to transit agency standards).

Transit Corridors - direct growth to increase the density of development along transit routes in the Management Area in an effort to support regional transit service goals.

Finding: *The recently annexed Rock Creek Area located south of SE Sunnyside Road between SE 152nd Avenue and SE 172nd Avenue is expected to develop as a major employment center with a need for future transit coverage. Bus route #10 currently provides service from downtown Portland to SE Foster Road at SE 122nd Avenue. An extension of this bus route should be considered further east on SE Foster Road, south on SE 172nd Avenue, west on Highway 212 with a returning loop to SE 172nd Avenue through the major employment center.*

Only one bus line currently serves the Sunrise Expressway IAMP areas on OR 212/224 and OR 224: Route 31, Estacada. However, the Sunrise Project proposes new express bus service on the Sunrise Expressway, between Clackamas Transit Center and Damascus Town Center. This new express service would run every 15 minutes during the peak hours, and every 60 minutes during the off-peak hours. The routing for this new express bus service on the Sunrise Expressway within the Sunrise Expressway IAMP areas will include a stop at the planned hospital site just north and east of the Rock Creek Junction interchange, near SE 162nd Avenue.

Planned bus stop enhancements, and development code regulations that will require new retail, office, and institutional buildings on sites at major transit stops to better accommodate pedestrian and transit rider connections, support modal choices in area.

Chapter Eight: Motor Vehicle Plan

The policies for motor vehicles include:

Strategies

Strategies for meeting automobile facility needs include the following:

Mitigate all Intersections to Level of Service D and V/C of 0.99 in the PM Peak Hour.

Access Management

Several access management strategies were identified to improve local access and mobility in Happy Valley:

- Develop specific access management plans for major and minor arterial streets in Happy Valley to maximize the capacity of the existing facilities and protect their functional integrity.
- Work with land use development applications to consolidate driveways where feasible.
- Construct raised medians to provide for right-in/right-out driveways as appropriate.
- New development and roadway projects located on City street facilities should meet the recommended access spacing standards summarized in Table 8-2. Access points include public streets, private streets, and private commercial or residential driveways. Any deviation to these spacing standards would require an access management plan to be approved by the City engineer. The maximum access spacing listed in this table is consistent with Metro.

Traffic Signal Spacing

A minimum traffic signal spacing of 1,000 feet is required for major arterial, minor arterial and collector facilities.

Local Street Connectivity

Figure 8-2 of the TSP shows the proposed Street Connectivity Plan for Happy Valley. The arrows shown on Figure 8-2 indicate priority for local and neighborhood connections only. Additionally, new development that constructs new streets, or street extensions, must provide a proposed street map that:

- Provides full street connections with spacing of no more than 530 feet between connections except where prevented by barriers.
- Provides bike and pedestrian access ways in lieu of streets with spacing of no more than 330 feet except where prevented by barriers.
- Limits use of cul-de-sacs and other closed-end street systems to situations where barriers prevent full street connections.
- Includes no close-end street longer than 200 feet or having no more than 10 dwelling units.
- Includes street cross-sections demonstrating dimensions of ROW improvements, with streets designed for posted or expected speed limits.

Finding: *Happy Valley Motor Vehicle plan strategies provide for a local street network that enhances connectivity and access, for all modes of travel, within the Sunrise Expressway IAMPs area. Spacing standards for streets, traffic signals, and*

access management ensure multiple connectivity and access opportunities.

Intersection Performance Standards

Policy 5a of the TSP establishes minimum intersection operating standards to be maintained for the City of Happy Valley. The City shall utilize these standards to evaluate land use actions and proposed mitigations. All public facilities shall be designed to meet these standards.

All signalized intersections shall operate at level of service D and V/C ratio of 0.90 or better during the peak hours of analysis. Individual movements must meet level of service E and a V/C ratio of 1.0.

All unsignalized two-way stop controlled intersections shall operate at level of service E or better (based on average approach delay) for all side street approaches during the peak hours of analysis.

All unsignalized all-way stop controlled intersections shall operate at level of service D or better based on average intersection delay during the peak hours of analysis.

***Finding:** TSP identifies acceptable operating standards of LOS “D” and “E” (in high employment areas) for City arterials and collectors. Restrictions on zone change approvals to those that will not reduce the LOS below acceptable performance evaluation LOS standards provide further protection to long-term operation of Sunrise Expressway interchange.*

2025 Priority

The 2025 Priority scenario includes additional transportation improvement projects that do not have an identified funding source and may not be constructed by the year 2025. Table 8-9 identifies the additional capacity improvements that are included in the priority scenario.

The Sunrise Corridor project identified in the priority system would provide a significant extension to the east – a new four-lane facility from the SE 122nd Avenue interchange to US 26 in Gresham. Preliminary plans provided by Clackamas County indicate that access to the facility near the Rock Creek Junction Interchange Management Area would be limited to an interchange at the Sunrise Expressway near the Highway 212/224 split. No direct access to the Sunrise Corridor would be provided from SE 152nd Avenue, SE 162nd Avenue or SE 172nd Avenue. This portion of the Sunrise Corridor, east of SE 172nd Ave. is being evaluated by Clackamas County and Damascus.

***Finding:** Happy Valley TSP identifies the need for construction of the Sunrise Project, as well as further extension of Sunrise Corridor improvements to SE 242nd Ave. and US 26.*

Proposed Roadway Network

The “Rock Creek Area” (bounded by SE Sunnyside Road, Highway 212, SE 152nd Avenue and SE 172nd Avenue) includes moderate housing growth south of SE Sunnyside Road and a major employment center north of Highway 212/224 expected to generate more

than 5,000 jobs in the next 20 years. An arterial and collector roadway system was developed within the Rock Creek Area to accommodate the future motor vehicle demands. The RTP identified Sunrise Expressway project would provide a direct regional connection to this area with the planned Sunrise Expressway interchange to alleviate some of the future demand on SE Sunnyside Road. The proposed Rock Creek Area roadway system is consistent with the conceptual roadway system developed by Clackamas County for the Damascus/Boring Concept Plan.

A new major east-west arterial roadway is recommended through the employment center to connect the Sunrise Expressway Rock Creek Junction interchange to SE 172nd Avenue and Damascus to the east. This would serve local demand from the employment center and provide access to the regional roadway system for trips outside the Management Area.

The extension of SE 162nd Avenue would provide area-wide connectivity between the residential neighborhoods planned north of SE Sunnyside Road and the future residential and employment center planned south of SE Sunnyside Road. This new north-south roadway extension is needed to alleviate future demands on SE 172nd Avenue. The SE 162nd Avenue extension has several geographical challenges including a creek crossing and steep grades.

A supporting collector roadway system was defined within the employment center area to provide local circulation. The collector facilities were planned approximately one-quarter mile apart to establish desirable traffic signal spacing.

The identified roadway network within the Rock Creek Employment Area between Rock Creek and SE 162nd Avenue does not propose specific alignments but rather serves as a guideline for potential roadway connections. A transportation master plan should be developed for the area which considers all reasonable roadway network alternatives combined with future land use proposals to produce a balance between circulation/capacity needs and land use/environmental sensitivities in the Rock Creek Interchange Management Area.

Sunrise Corridor

The 2025 Priority scenario includes the Sunrise Corridor project as a four lane expressway from I- 205 to US 26. The forecasted 2025 Priority scenario volumes on Sunnyside Road between I-205 and SE 172nd Avenue indicate a need for additional east-west capacity in the Management Area. To accommodate future traffic demands, the Sunrise Corridor may require additional lanes. Specific project needs such as cross-section and alignment are determined in the Environmental Impact Statement.

***Finding:** The Happy Valley TSP proposes development of an arterial and collector roadway system within the Rock Creek Area to accommodate the forecast future motor vehicle demand in the IAMP area. This proposed roadway network provides for the efficient coordination and connection among land-uses within the City.*

Motor Vehicle Master Plan

The Motor Vehicle Master Plan combines both improvement projects identified in prior plans (Happy Valley TSP, Clackamas County TSP, Rock Creek Plan, Metro RTP, etc.) and those determined as the outcome of the Happy Valley TSP update analysis. These improvements are shown in Figure 8-10 and listed in Table 8-12. The proposed new roadways/extension projects listed in Table 8-12 have been identified (i.e. Roadway A) to correspond with the labels shown in Figure 8-10.

Motor Vehicle Master Plan Projects

Two projects identified in the Motor Vehicle Master Plan are in the vicinity of the Sunrise Expressway Rock Creek junction IAMP:

- SE 162nd Avenue Widening to a 3-lane collector from Palermo Avenue to Sunnyside Road.
- (Roadway M) Construct a new 5-lane east-west major arterial from SE 177th Avenue to the Sunrise Expressway Rock Creek Junction interchange.

***Finding:** The Sunrise Project, and proposed new roadway network within the Sunrise Expressway IAMP areas intended to complement this new expressway, are clearly identified in the Happy Valley TSP Motor Vehicle Master Plan, and map (Figure 8-10).*

Damascus Planning Requirements – Only applicable to the Rock Creek Junction IAMP

Properties that are within Damascus are governed by the Clackamas County comprehensive plan and zoning designations until the Damascus Comprehensive Plan and map are acknowledged by the Land Conservation and Development Commission (LCDC). The LCDC is currently reviewing the submitted plan and working with the city to confirm the contents of its submittal for hearing before the commission. A date has not been set for the commission to hear the acknowledgement request. Damascus provisionally adopted the Clackamas County ZDO and Comprehensive Plan on January 17, 2005.