APPENDIX A

Land Uses and Vehicle Trip Generation

APPENDIX A

Land Uses and Vehicle Trip Generation

Traffic counts were conducted during the 4:00 to 6:00 PM afternoon/evening peak period at driveways along SW Macadam Avenue (OR 43) between SW Taylors Ferry Road/SW Miles Street and just south of the Sellwood Bridge. Table A-1 shows the highest one-hour traffic volumes to and from each of the sites along this segment of SW Macadam Avenue during this peak period.

TABLE A-1
Existing PM Peak Hour Vehicle Trip Generation

Site	Inbound	Outbound	Total
7400 and 7520 SW Macadam Avenue (Heuker and Autowerks)[a]	14	25	39
7524 SW Macadam Avenue (Freeman Motor Company)	10	13	23
7720 SW Macadam Avenue (Macadam Bay Club)	9	1	10
8240 SW Macadam Avenue (Staff Jennings)	3	8	11
8421 SW Macadam Avenue (River View Cemetery)	4	18	22

[a] Sites share driveway on SW Macadam Avenue. Trip generation includes trips through OR 43/SW Miles Street intersection (8 inbound/12 outbound).

The City of Portland and Metro estimated existing and potential future building square footage for each of the sites based upon floor area ratio estimates, setbacks (including assumed setbacks for potential future streetcar right-of-way), and parking area needs (Table A-2). It was assumed that future building uses would consist of 65 percent office-related uses and 35 percent retail-related uses, where appropriate.

TABLE A-2
Existing and Potential Land Uses

Site	Existing Square Feet	Potential Future Square Feet[a]		
		Maximum	Office	Retail
7400 SW Macadam Avenue (Heuker)	25,010	103,000	66,950	36,050
7520 SW Macadam Avenue (Autowerks)	14,935	46,700	30,355	16,345
7524 SW Macadam Avenue (Freeman Motor Company)	24,796	24,796	16,117	8,679
7720 SW Macadam Avenue (Macadam Bay Club)	n/a	n/a	n/a	n/a
8240 SW Macadam Avenue (Staff Jennings)	15,690	61,250	39,813	21,438
8421 SW Macadam Avenue (River View Cemetery)	n/a	n/a	n/a	n/a

[a] City of Portland and Metro provided estimates based on floor area ratio estimates, setbacks, and parking area needs. Potential future building uses assume 65% office-related uses and 35% retail-related uses.

Potential future vehicle trip generation for the afternoon/evening peak hour at driveways along SW Macadam Avenue between SW Taylors Ferry Road/SW Miles Street and just south of the Sellwood Bridge was estimated based upon future assumed land uses and application of standard trip generation rates, as well as potential building size increases (Table A-3).

TABLE A-3
Existing and Future Potential PM Peak Hour Vehicle Trip Generation

Site	Existing Vehicle Trip Generation			Future Vehicle Trip Generation		
	Inbound	Outbound	Total	Inbound	Outbound	Total
7400 and 7520 SW Macadam Avenue (Heuker and Autowerks)[a]	14	25	39	112	165	277
7524 SW Macadam Avenue (Freeman Motor Company)[b]	10	13	23	10	13	23
7720 SW Macadam Avenue (Macadam Bay Club)[c]	9	1	10	9	1	10
8240 SW Macadam Avenue (Staff Jennings)[d]	3	8	11	12	31	43
8421 SW Macadam Avenue (River View Cemetery)[c]	4	18	22	4	18	22

[a] Future vehicle trip generation was estimated based on (1) the average of the Institute of Transportation Engineer's trip generation rates for general office building and specialty retail center, and (2) factoring existing vehicle trips by potential building size increases.

[b] Assumes Freeman Motor Company property does not redevelop because the site recently went through a major upgrade.

[c] Assumes no change in use or number of vehicle trips.

[d] Future vehicle trip generation estimated by factoring existing vehicle trips by potential building size increase.

APPENDIX B
Traffic Operations

APPENDIX B

Traffic Operations

Year 2035 PM peak hour intersection and driveway performance was evaluated for No Sellwood Bridge project (No Project) conditions and Sellwood Bridge project (Project) conditions. Table B-1 summarizes intersection and driveway volume to capacity (V/C) ratios, average motorist delays (in seconds), and corresponding Levels of Service (LOS). The results were obtained by using Synchro and SimTraffic, software applications for performing capacity analysis and microsimulation of vehicular traffic, respectively. The delay and LOS results shown in Table B-1 are based on *Highway Capacity Manual* (Transportation Research Board, 2000) methods.

Project conditions would consolidate driveways and reduce conflict points along SW Macadam Avenue (OR 43), and would provide an interchange with the Sellwood Bridge. The interchange would provide access to River View Cemetery, Staff Jennings, and Powers Marine Park. The interchange's grade-separated signalized ramp intersection would operate with a V/C ratio of 0.82. Through movements along SW Macadam Avenue would not be impeded because of the grade separation.

Under No Project conditions, the existing at-grade signalized intersection just south of the Sellwood Bridge would operate with a V/C ratio of 1.21 and would affect through movements along SW Macadam Avenue.

The Oregon Department of Transportation's mobility standard for District Highways such as OR 43 is a V/C ratio of no greater than 0.85 (ODOT, 1999).

As shown in Table B-1, the project would not affect operations at the SW Macadam Avenue/Taylors Ferry Road-Miles Street intersection.

TABLE B-1
Year 2035 No Project vs. Project Intersection and Driveway Performance Conditions

Year 2035 No Project Conditions

SW Macadam Ave/SW Taylors Ferry Rd–SW Miles St

Movement	V/C	Delay (sec)	LOS
EB Left-Thru	1.14	141.4	F
EB Right	0.86	25.8	C
WB Left-Thru-Right	0.53	38.6	D
NB Left	1.27	166.6	F
NB Thru-Right	0.38	7.6	A
SB Thru-Right	1.18	115.0	F
Overall	***1.20***	***85.1***	***F***

SW Macadam Ave/Autowerks Property

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.55	95.1	F
SB Left	0.07	1.4	A

SW Macadam Ave/Freeman Motor Company North Approach

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.29	167.8	F
SB Left	0.01	14.9	B

SW Macadam Ave/Freeman Motor Company South Approach

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.02	17.0	C
SB Left	0.01	14.8	B

Year 2035 Project Conditions

SW Macadam Ave/SW Taylors Ferry Rd–SW Miles St

Movement	V/C	Delay (sec)	LOS
EB Left-Thru	1.14	141.1	F
EB Right	0.86	25.9	C
WB Left-Thru-Right	0.53	38.6	D
NB Left	1.27	166.6	F
NB Thru-Right	0.38	7.6	A
SB Thru-Right	1.18	115.0	F
Overall	***1.20***	***85.1***	***F***

SW Macadam Ave/Autowerks Property

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.55	95.1	F
SB Left	0.07	1.4	A

SW Macadam Ave/Freeman Motor Company North Approach

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.29	167.8	F
SB Left	0.01	14.9	B

SW Macadam Ave/Freeman Motor Company South Approach

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.02	17.1	C
SB Left	0.02	15.0	B

TABLE B-1
Year 2035 No Project vs. Project Intersection and Driveway Performance Conditions

Year 2035 No Project Conditions

SW Macadam Ave/Macadam Bay Club Approach

Movement	V/C	Delay (sec)	LOS
WB Left-Right	0.00	16.9	C
SB Left	0.01	14.9	B

SW Macadam Ave/Staff Jennings Approach

Movement	V/C	Delay (sec)	LOS
WB Left-Right	1.77	>500.0	F
SB Left-Thru	0.00	0.0	-

SW Macadam Ave/River View Cemetery Approach

Movement	V/C	Delay (sec)	LOS
EB Left-Thru-Right	0.28	46.3	D
NB Thru	0.80	19.2	B
NB Right	0.41	1.2	A
SB Left-Thru-Right	1.20	115.5	F
SW Left-Right	1.35	210.6	F
Overall	***1.21***	***87.8***	***F***

Year 2035 Project Conditions

SW Macadam Ave Interchange (Staff Jennings and River View Cemetery)

Movement	V/C	Delay (sec)	LOS
EB Left-Thru	0.47	44.2	D
EB Right	0.02	0.0	A
WB Left-Thru	0.90	43.6	D
WB Right	0.59	10.0	A
SB Left	0.91	36.9	D
SB Right	0.00	17.7	B
NB Left	0.05	39.8	D
NB Right	0.41	19.0	B
Overall	***0.82***	***39.3***	***D***

EB = eastbound

LOS = Level of Service, designated with letters A through F, with A representing the best operating conditions and F the worst

NB = northbound

SB = southbound

sec = seconds

SW = southwest

V/C = volume to capacity ratio

WB = westbound

APPENDIX C

Anticipated Driveway Modifications

APPENDIX C

Anticipated Driveway Modifications

During preparation of this OR 43: Sellwood Bridge Interchange Area Management Plan (IAMP), the City of Portland and the Oregon Department of Transportation (ODOT) developed the following set of anticipated driveway modifications to implement the IAMP Circulation and Access Management Plan (Option A). ODOT anticipates implementing the following modifications in the Access Management Strategy, provided traffic analysis of Sellwood Bridge project final designs shows that they will operate safely and adequately:

- The Sellwood Bridge Project will relocate OR 43 approach roads to Tax Lots # 1S1E22 200, 1S1E22 300, 1S1E22D 300, and 1S1E27 100 (River View Cemetery); Tax Lots # 1S1E22DB 700 and 1S1E22DB 800 (Staff Jennings); and Tax Lots # 1S1E22D 200 and 1S1E27A 100 (Powers Marine Park) to the signalized intersection at the interchange.
- The Sellwood Bridge Project will eliminate the approach road to Tax Lots # 1S1E22A 1100 and 1S1E22DB 100 (Macadam Bay Club) for general traffic use. ODOT will allow use of the existing approach road for emergency access and pedestrian and bicycle use, if needed.
- The Sellwood Bridge Project will consolidate the primary approach road for Tax Lots # 1S1E22A 1100 and 1S1E22DB 100 (Macadam Bay Club) with the south approach to Tax Lots # 1S1E22AC 4500 and 1S1E22AC 4600 (Freeman Motor Company). The property owners and City of Portland support the provision of full directional turning movements at this access point because of land use and business operation benefits. ODOT recognizes this preference and will use traffic impact analysis conducted during project final design to determine what turning movements can be provided safely at this location.
- With the cooperation of the City of Portland, the Sellwood Bridge Project will clear trees adjacent to the east side of OR 43 south of Tax Lot # 1S1E22AC 4600 (the Macadam Bay Club/south Freeman Motor Company approach road point) in response to sight-distance concerns. The Sellwood Bridge Project will conduct the tree clearing to achieve a minimum clear sight distance of 470 feet.
- ODOT will eliminate the northernmost approach point closest to the signalized intersection at OR 43 and SW Taylors Ferry Road/SW Miles Street in Tax Lot # 1S1E22AC 4300. Currently, this approach is not used regularly.

Although the City of Portland and ODOT have agreed to these anticipated modifications in principle, they will be revisited during interchange final design to assure they meet safety needs, as well as business and residential access needs.

APPENDIX D

Safety Priority Index System Formulation

APPENDIX D

Safety Priority Index System Formulation

The Safety Priority Index System (SPIS; Oregon Department of Transportation [ODOT], 2009) is a method of identifying for further investigation potential locations that have exhibited high instances of crash activity. Locations that exhibit a high number of crashes may or may not have remedies to reduce the frequency of crashes. A careful investigation is required to determine the causes or root problem of the crashes and, even then, a relatively high occurrence of crashes may only be because of the sporadic nature of the crashes. The goal of investigating these locations is to systematically investigate sites where there is a potential to reduce the risk, occurrence, and/or severity of crashes and apply limited funds allocated for transportation safety to produce the highest benefit.

The SPIS score, which is based on 3 years of crash data, considers crash frequency, crash rate, and crash severity. A roadway segment becomes an SPIS site if a location has three or more crashes **or** one or more fatal crashes over the 3-year period. SPIS sites are 0.10-mile (0.16-kilometer) sections on the state highway system. The priority index has three parameters and associated Indicator Values (IVs) (Table D-1).

TABLE D-1
Safety Priority Index System Indicators

Indicator Value	Abbreviation	Percentage of SPIS Score
Crash Frequency	IV_{Freq}	25%
Crash Rate	IV_{Rate}	25%
Crash Severity	$IV_{Severity}$	50%

IV = Indicator Value

The crash frequency indicator value (IV_{Freq}) is a value between 0 and 25 determined using a logarithmic distribution based on total crashes in a 3-year period (Figure D-1). The ***maximum*** indicator value of 25 percent is obtained when the total number of crashes reaches 150 crashes on the same 0.10-mile segment (0.16-kilometer) over a 3-year period.

$$IV_{Freq} = \left[\frac{LOG(TotalCrashes + 1)}{LOG(150 + 1)}\right](25)$$

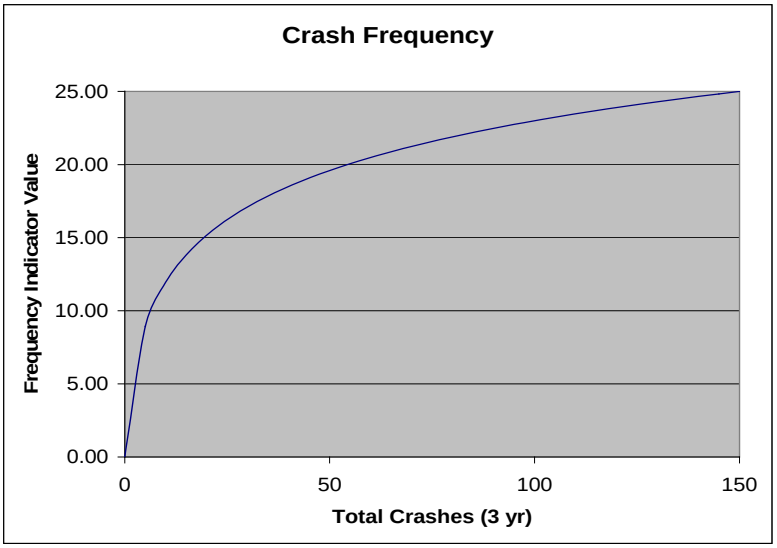

FIGURE D-1. Crash Frequency

The crash rate indicator (IV_{Rate}) is a value between 0 and 25, also determined by using a logarithmic distribution based on the following crash rate calculations (Figure D-2). Again, the ***maximum*** indicator value of 25 percent is obtained when the crash rate reaches seven crashes per million entering vehicles.

$$IV_{Rate} = \left[\frac{LOG\left(\left(\frac{(TotalCrashes)(1{,}000{,}000)}{(3yr)(365days)(ADT)} \right) + 1 \right)}{LOG(7+1)} \right](25)$$

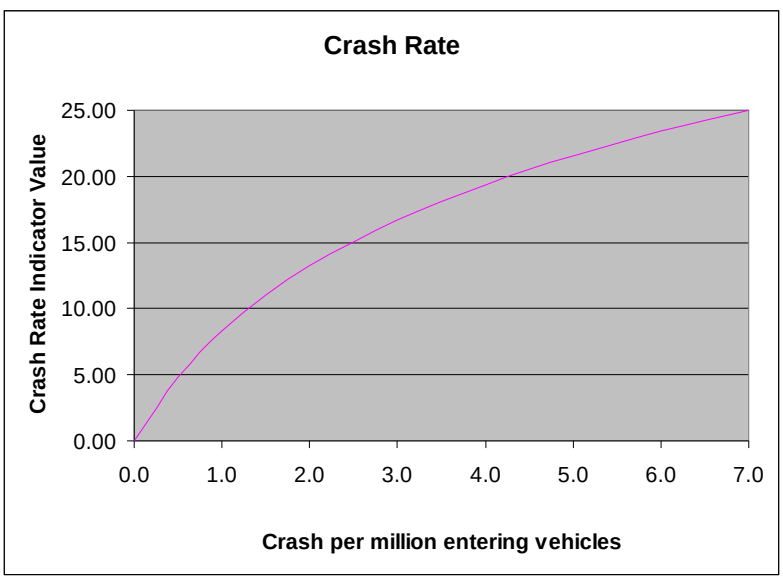

FIGURE D-2. Crash Rate

The crash severity indicator ($IV_{Severity}$) is a value between 0 and 50 that is determined by using a linear distribution from the following calculation. The formula considers severity values between 0 and 300 only. Therefore, severity products above 300 are assigned the maximum value, to match the maximum indicator value of 50 percent.

$$IV_{Severity} = \left[\frac{100(FATAL + INJ_A) + (10)(INJ_B + INJ_C) + (PDO)}{(300)} \right](50)$$

Where:

FATAL = the number of fatal crashes

INJ_A = the number of severe injury crashes (Class A)

INJ_B = the number of moderate injury crashes (Class B)

INJ_C = the number of minor injury crashes (Class C)

PDO = the number of "property damage only" crashes

Note: ***The severity rating for a crash is the severity of the most severe injury received.***

The SPIS value is the sum of the above indicator values (IV_{Freq}+IV_{Rate}+$IV_{Severity}$) for 0.10-mile (0.16-kilometer) sections of urban and rural roads, shifted by 0.01 mile (0.16-kilometer) for each new section.

The advantages of the SPIS formulation are that:

- It overcomes the problems with any one measure alone (for example, crash rates are high when volumes are low or frequencies are higher on higher volume roads or one multiple vehicle crash may skew priorities).
- It allows for a fair comparison of different functional classes or volumes (for example, interstates vs. two-lane rural state highways.
- The SPIS cut-off values for the top 5 percent or the top 10 percent can serve as a fair surrogate for a performance measure.

Disadvantages of the SPIS formulation are that:

- A high SPIS does not always indicate a roadway deficiency or a location where a fix can be accomplished.
- SPIS gives no clue to the real problem or root cause of the high occurrence of crashes.
- SPIS is only as good as the crash records that feed the system. In Oregon, because submittal of crash report forms is the primarily responsibility of the individual driver, the crash data cannot be guaranteed to represent all qualifying crashes nor can assurances be made that all details pertaining to a single crash are accurate.

APPENDIX E
Plan and Policy Compliance

APPENDIX E

Plan and Policy Compliance

This appendix presents information about the following relevant state, regional, and local plans and policies with information supporting the OR 43: Sellwood Bridge Interchange Area Management Plan (IAMP) compliance:

- Statewide Planning Goals
- Oregon Transportation Plan
- Oregon Highway Plan
- OAR 660 Division 12: Transportation Planning Rule
- Oregon Administrative Rules
- Metro Regional Transportation Plan
- City of Portland Transportation System Plan
- City of Portland Freight Master Plan
- Local Transportation, Land Use, and Neighborhood Plans
- Portland City Code

In reviewing these findings, it is important to recall that the Sellwood Bridge/OR 43 interchange would be built as part of the Sellwood Bridge project, which is still in the planning process. Therefore, these findings refer to activities performed and information gathered as a part of the Sellwood Bridge project process, including pending or future actions meant to achieve compliance.

Statewide Planning Goals

Oregon law requires transportation plans to comply with Oregon's statewide planning goals.

Goal 1: Citizen Involvement

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

Public involvement for the Sellwood Bridge project included:

- A Community Task Force comprised of representatives from neighborhoods; representatives of local and regional business groups; advocates for different bridge user groups, and representatives of natural resource, historic resource, and aesthetic interests. This group met 24 times, and made recommendations at each decision point throughout the project development process.

- Six public open houses and workshops throughout the project development process. These venues provided project information and gathered public feedback. On average, 150 individuals participated in each meeting, with a total meeting attendance of approximately 800 persons. A total of 260 comment forms were collected.

- An interactive project Web site with monthly project information updates. The Web site had approximately 31,800 hits, with a total of 821 comments.
- Five on-line surveys, one at each decision point in the project development process. These surveys gathered public opinions related to key project decisions. On average, 1,500 individuals participated in each survey, with a total number of 8,415 responses. Approximately 35 percent of the responders resided in the neighborhoods adjacent to the project site. The remainder of the respondents were predominately from inner and outer southeast Portland, with varying representation from Clackamas County and the rest of the Portland area.
- Five project newsletters, each to 23,000 area households. These households included 767 residences in the project vicinity and 1,323 parties who requested inclusion in the project mailing list. In addition, the newsletters and open house reminders were emailed to over 5,000 individuals who requested notification.
- Nearly 100 meetings of community organizations interested in the project.
- Twenty-eight press releases distributed to media sources. Major news media outlets covered the project in approximately 70 articles/broadcasts in 2009, 24 articles/ broadcasts in 2008, 42 articles/broadcasts in 2007, and 6 articles /broadcasts in 2006.

Public involvement activities for the OR 43: Sellwood Bridge IAMP included:

- Interviews with private property owners and agencies affected by IAMP access management and land use issues. These interviews identified their concerns.
- Individual meetings with private-property-owner stakeholders (Macadam Bay Club residents; residents of SW Miles Place, SW Miles Street, and SW Miles Court; and owners of River View Cemetery, Staff Jennings, Freeman Motor Company, Heuker, and Autowerks). These meetings obtained their input on initial access management options and generated other ideas for access improvements.
- Meetings with agencies and private property owners. These meetings discussed revised IAMP options.
- A public open house, which obtained public input on the final three IAMP options.

Goal 2: Land Use Planning

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

The OR 43: Sellwood Bridge IAMP was developed in accordance with the policy framework presented in these findings. For this IAMP, ODOT provided ongoing coordination and collaboration with the Sellwood Bridge project and the City of Portland. The interchange design and circulation and access management plans were coordinated with, and are consistent with, the City of Portland land use and transportation plans.

When preparing the *Sellwood Bridge Project Land Use Technical Report* (CH2M HILL, 2008a, updated 2010) and the *Sellwood Bridge Project Transportation Technical Report* (CH2M HILL et al., 2008, updated 2010) for the Sellwood Bridge Project Draft Environmental Impact Statement (DEIS; Multnomah County et al., 2008), the following plans, policies, and regulations were reviewed to determine their influence on the project and this IAMP:

- Statewide Planning Goals Oregon Transportation Plan
- Oregon Highway Plan
- OAR 660, Division 12: Transportation Planning Rule
- OAR 731-015-0065: Coordination Procedures for Adopting Final Facility Plans
- OAR 734, Division 51: Highway Approaches, Access Control, Spacing Standards and Medians
- Metro 2040 Growth Plan
- Metro Regional Framework Plan
- Metro Regional Transportation Plan
- Metro South Willamette River Crossing Study
- City of Portland Comprehensive Plan
- City of Portland Code and Charter (Zoning Code)
- City of Portland Transportation System Plan
- City of Portland Tacoma Main Street Plan
- City of Portland Corbett-Terwilliger-Lair Hill Policy Plan
- City of Portland Sellwood-Moreland Neighborhood Plan
- City of Portland Southwest Community Plan
- City of Portland Freight Master Plan
- City of Portland Parks 2020 Vision
- City of Portland Pedestrian Master Plan
- City of Portland Bicycle Master Plan
- City of Portland Scenic Resources Protection Plan
- City of Portland Willamette Greenway Plan and River Plan
- City of Portland Willamette River Bridges Accessibility Project
- City of Portland Willamette River Concept Plan
- City of Portland Zoning Code
- Multnomah County Bicycle Master Plan

The land use analysis conducted for the DEIS (CH2M HILL, 2008a, updated 2010) and reviewed during preparation of this IAMP concluded that the preferred alternative for the Sellwood Bridge project and this IAMP comply with the relevant portions of these plans and policy documents.

As part of the Sellwood Bridge project National Environmental Policy Act of 1969 (NEPA) process in which the interchange design was developed, the project provided ongoing coordination with cooperating and participating agencies at the local, state, and federal levels. These agencies included the following:

- **Federal Agencies.** Federal Emergency Management Agency, National Marine Fisheries Service, U.S. Coast Guard, U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Agency

- **Tribal Governments.** Confederated Tribes of Siletz
- **State Agencies.** Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, Oregon Department of Land Conservation and Development, Oregon Division of State Lands, Oregon State Historic Preservation Office
- **Local Agencies.** City of Milwaukie, City of Portland, Clackamas County, Metro, TriMet

As described in Appendix A, the *City of Portland Comprehensive Plan* (City of Portland, 2006a) and Portland's zoning code provided the land use component of this IAMP. A core management team comprised of representatives of the City of Portland, ODOT, and Multnomah County developed the IAMP circulation and access management plan options. Evaluation of IAMP options used the traffic estimates generated by the Metro and City of Portland traffic models.

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

This goal requires local governments to adopt programs that will protect natural resources and conserve scenic, historic and open space resources for present and future generations.

This goal includes the following resources affected by the Sellwood Bridge project—riparian corridors, wildlife habitat, natural areas, recreational trails, and cultural areas. Impacts to these resources are discussed in the *Sellwood Bridge Project Biological Resources Technical Report* (CH2M HILL, 2008b, updated 2010) and the *Sellwood Bridge Project Cultural Resources Technical Report* (CH2M HILL, 2008c, updated 2010).

The Sellwood Bridge project would remove 12.3 acres of Lowland Conifer-Hardwood Forest and 0.5 acre of Riparian vegetation. In addition, the project would disturb 11.7 acres of wildlife habitat. Mitigation measures to address these impacts have been agreed to by Portland Parks & Recreation (PP&R; owner of open space areas) and ODOT. These measures include the purchase of additional open space to replace lost natural resource values and stream restoration within the project area. PP&R has determined the preferred alternative (including mitigation measures) would result in a "net benefit" to the open space area.

The Sellwood Bridge project would require relocation of 0.3 linear mile of the existing Willamette Greenway Trail on the west side of the river, but would reconstruct this trail with a wider facility located away from OR 43.

The Sellwood Bridge project would adversely affect the historic Sellwood Bridge (it would be replaced by a new bridge), the setting of the historic River View Cemetery, and the setting of the Superintendent's House in the cemetery. Mitigation measures to address these impacts have been agreed to by the State Historic Preservation Office and ODOT, and are documented in the Sellwood Bridge Project Final Environmental Impact Statement. The preferred alternative would have the same impacts as the other Build alternatives considered in the DEIS (Multnomah County et al., 2008).

Goal 9: Economic Development

This goal requires that local comprehensive plans and policies contribute to the stable and healthy economy in all regions of the state.

The nearly 100 businesses with about 860 employees located in the Sellwood Bridge project area rely on the Sellwood Bridge/OR 43 interchange to provide access for their customer base. These businesses serve needs of nearby residents on the east and west sides of the Willamette River, customers from outside the area on both sides of the river who have targeted particular businesses for shopping or dining, and pass-by customers who use the Sellwood Bridge en route to destinations outside Sellwood. The interchange supports regional travel markets, with 52 percent of the vehicle trips between Clackamas County and Portland, 17 percent between the east side of Portland and the west side of Portland, 13 percent between Clackamas County and Washington County, 11 percent between Portland and Washington County, and 7 percent between the east side of Clackamas County and the west side of Clackamas County.

The IAMP circulation and access management plan protects the function of the interchange by serving existing and planned uses in the area, and ensuring that capacity and operations are safe and adequate for the long term. Preserving the long-term function and safety of the Sellwood Bridge/OR 43 interchange supports local and regional economic development goals and plans.

Goal 11: Public Facilities and Services

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

This IAMP provides for replacement of a substandard interchange facility with no shoulders, horizontal curve deficiencies, and inadequate bicycle and pedestrian crossing facilities. These attributes are related to the frequency of crashes, particularly during periods of congested traffic. By providing standard geometric design, the new interchange will better serve planned large truck, bus, streetcar, and bicycle and pedestrian uses.

Goal 12: Transportation

Goal 12 requires cities, counties, metropolitan planning organizations, and ODOT to provide and encourage a "safe, convenient and economic transportation system." This is accomplished through development of Transportation System Plans based on inventories of local, regional and state transportation needs. Goal 12 is implemented through the Transportation Planning Rule (TPR) that contains numerous requirements governing transportation planning and project development. The following paragraphs discuss findings of compliance with the TPR.

The Sellwood Bridge project is consistent with Goal 12 because the project is a recommendation of the City of Portland's Transportation System Plan. The transportation system incorporated into this IAMP is adequate to serve the planned land uses and to meet *Oregon Highway Plan* (ODOT, 1999) mobility standards at the ramp terminals of the Sellwood Bride/OR 43 interchange. This IAMP encourages a safe, convenient, and economic transportation system.

Goal 15: Willamette River Greenway

Goal 15 requires the protection, conservation, enhancement, and maintenance of the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

The Sellwood Bridge project would be constructed within the Willamette River Greenway and must receive a Greenway Goal Exception from the City of Portland to allow fill to be placed in the Greenway. An application has been filed and is expected to be approved. The Federal Highway Administration requires approval of the goal exception before it will issue a Record of Decision that provides final environmental approval of the Sellwood Bridge project.

Other Statewide Planning Goals

The following Statewide Planning Goals were reviewed and found not to apply to this IAMP:

- Goal 3: Agricultural Lands
- Goal 4: Forest Lands
- Goal 6: Air, Water, and Land Resources Quality
- Goal 7: Areas Subject to Natural Hazard
- Goal 8: Recreational Needs
- Goal 10: Housing
- Goal 13: Energy Conservation
- Goal 14: Urbanization
- Goal 16: Estuarine Resources
- Goal 17: Coastal Shorelands
- Goal 18: Beaches and Dunes
- Goal 19: Ocean Resources

Oregon Transportation Plan

The Oregon Transportation Plan (OTP) is the state's long-range multi-modal 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 following paragraphs discuss the most pertinent OTP goals and policies for interchange planning.

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.

The Sellwood Bridge project will replace the interchange to include improved bicycle and pedestrian facilities, to accommodate streetcar and bus transit, and to provide a hub for transfer among all the modes. Without the project, streetcar and bus transportation cannot use the interchange because of load restrictions on the Sellwood Bridge.

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.

The improvements to the interchange will facilitate intercity mobility along the OR 43 and OR 99E corridors. The access management provisions will allow flexibility for ODOT to make future access management decisions that minimize adverse effects on urban land use and travel patterns while protecting the safety of highway users.

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 efficient for the long term benefit of people and goods movement.

The *Oregon Highway Plan* (ODOT, 1999) sets the standard of volume to capacity (V/C) ratio of 0.85 or better at freeway ramp terminals. As shown in Appendix B, the grade-separated ramp terminal intersection is expected to operate with a V/C ratio of 0.82. Based on estimated motorist delay, the intersection would operate at Level of Service (LOS) D conditions (average delay of 39 seconds per motorist), which would meet City of Portland standards.

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.

Implementation of this IAMP will enable ODOT to protect the system capacity of the interchange through ongoing management of the roads that are integral to its function. To maximize the operational life of the interchange and to protect the safety of its users, the long-term provisions of this IAMP call for the creation of an alley, easement, or tract to provide alternate access to properties adjacent to OR 43 south of SW Miles Street if justified by redevelopment, change in land use, or change in safety conditions.

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.

Portland's *Freight Master Plan* (City of Portland, 2006b) designates SW Tacoma Street as a Truck Access Street in recognition of its service as an access circulation route for the delivery of goods and services to neighborhood-serving commercial and employment land uses. However, large trucks have been precluded from using the bridge and the interchange since the introduction of a 10-ton weight restriction on Sellwood Bridge in 2003. Interchange improvements coupled with replacement of the Sellwood Bridge will enable reintroduction of large trucks into the corridor, reducing or eliminating existing out-of-direction travel. On a daily basis, about 1,600 heavy trucks (three-axle, single-unit trucks and larger) are expected to use the interchange. Freight modes other than trucks are not affected by this IAMP.

Policy 3.2: Moving People to Support Economic Vitality

It is the policy of the State of Oregon to develop an integrated system of transportation facilities, services and information so that intrastate, interstate and international travelers can travel easily for business and recreation.

Although the interchange does not substantially support intrastate, interstate, or international travel, it does support regional commuter travel, as described in the response to Statewide Planning Goal 9: Economic Development. The Sellwood Bridge/OR 43 travelshed is critical for the efficient movement of employees to and from their jobs in the region.

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.

The Sellwood Bridge project has evaluated potential environmental impacts to natural resources including fish, wildlife, terrestrial resources, wetlands, water quality, geology, groundwater, hazardous materials, and air quality. These analyses, which are presented in the technical reports prepared to inform the DEIS, are summarized in the DEIS (Multnomah County et al., 2008).

- The Sellwood Bridge project will not affect wetlands.
- Stormwater from the existing interchange flows untreated into the Willamette River. To clean the runoff, the Sellwood Bridge project will add stormwater treatment that will adhere to local, state, and federal water quality standards.
- The few unavoidable impacts to natural resources will be mitigated through improvement to fish and terrestrial habitats at Stephens Creek and to several other unnamed streams in the project area, and through design of a wildlife-friendly retaining wall in Willamette Moorage Park.

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.

Goals of the Sellwood Bridge IAMP include ensuring safe and efficient operations between connecting roadways and protecting the function, operations, and safety of the interchange. While the constrained urban environment in the IAMP study area creates conditions that preclude this IAMP from meeting ODOT access spacing standards, the local circulation and access management plan moves in the direction of these standards. The long-term provisions also create a framework for minimizing the number of private approaches with direct access to OR 43. If commercial properties in the area redevelop and an alley, easement, or tract behind the properties adjacent to OR 43 south of SW Miles Street is created, the number of potential conflicts between vehicles at non-signalized intersections will be reduced. The interchange design will greatly enhance the safety of bicycle and pedestrian facilities, and reduce the substandard geometric elements for motorized vehicles.

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.

As described earlier in these findings (see response to Statewide Planning Goal 2: Land Use Planning), development of this IAMP involved ongoing collaboration with the City of Portland and Multnomah County. The local circulation and access management plan options were evaluated for consistency with City, Metro, and Multnomah County transportation and land use plans. The preferred access management strategy seeks to balance preservation of the safety and mobility of the interchange with preservation of the existing commercial and residential uses in the corridor. The Macadam Bay Club approach will be moved farther from the interchange ramps, and one private commercial approach with direct access to OR 43 will be closed.

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.

As described earlier in these findings (see response to Statewide Planning Goal 1: Citizen Involvement), both the Sellwood Bridge project and this IAMP incorporated public involvement activities. These activities included multiple public meetings and events for the general public and stakeholders affected by this IAMP. Opportunities to offer input were provided at multiple points in the planning process.

Policy 7.4: Environmental Justice

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

The *Sellwood Bridge Project Environmental Justice Technical Report* (CH2M HILL, 2008d, updated 2010) was prepared in support of the DEIS (Multnomah County et al., 2008). The technical report documented that the percentage of minority and low-income populations in the project area is smaller than those in the Portland-Vancouver Primary Metropolitan Statistical Area. Interviews were conducted with medical, housing, and education service providers and with representatives of neighborhood associations to determine potential impacts to these populations from the Sellwood Bridge project alternatives. The environmental justice study concluded that it is unlikely the Sellwood Bridge project will result in disproportionately high and adverse effects on minority and/or low-income populations. Restoration of transit service on the bridge and through the interchange, and improvement of the bicycle and pedestrian facilities could benefit the low-income population to a greater extent than the population as a whole.

Oregon Highway Plan

The *Oregon Highway Plan* (OHP) (ODOT, 1999) establishes policies and investment strategies for Oregon's state highway system over a 20-year period and refines the OTP goals and policies. OHP policies 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 transportation systems. The following paragraphs describe the policies applicable to the OR 43: Sellwood Bridge IAMP.

Policy 1A: Highway Classification

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

The State Classification System classifies OR 43 as a District Highway (as described in Section 5, Interchange Area Management Plan of this IAMP).

Policy 1B: Land Use and Transportation

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

As described earlier in these findings (see response to Statewide Planning Goal 2: Land Use Planning), development of this IAMP involved ongoing collaboration with the City of Portland and Multnomah County. In addition, the Metro and City traffic models were used to guide the development and selection of the IAMP local circulation and access management plan options. This IAMP provides for a transportation system that is adequate to serve the planned land uses and maintain the function of the interchange.

Policy 1F: Highway Mobility Standards

Policy 1F 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.

ODOT's mobility standard for District Highways such as OR 43 is a V/C ratio of no greater than 0.85 (ODOT, 1999). Under No Project conditions in 2035, the signalized at-grade intersection along OR 43 and just north of the Sellwood Bridge would operate with a V/C ratio of 1.21, failing to meet ODOT's mobility standard and affecting through traffic on OR 43. Under Project conditions in 2035, this at-grade intersection would be removed and a grade-separated interchange would be provided. This interchange would enable unimpeded movement along OR 43. The signalized intersection at the grade-separated interchange would have a V/C ratio of 0.82, which would meet ODOT's mobility standard.

Policy 1G: Major Improvements

Policy 1G requires maintaining performance and improving safety by improving efficiency and management before adding capacity.

The Sellwood Bridge project (which necessitated this IAMP) engaged in a planning process. The result of that process was a preferred alternative that would not add capacity for motorized vehicles. It would maintain the same number of through-traffic lanes that are currently on the bridge and in the interchange. The conceptual design provides two additional lanes on the west end of the bridge to separate northbound and southbound

movements and to provide for queuing. The alignment of the OR 43 portion of the project is designed to accommodate expansion to four lanes in the future without major expense. The capacity additions to the project are provided solely through improved bicycle and pedestrian facilities, and the reintroduction of transit services. (Currently, transit services are precluded from the bridge because of a 10-ton weight restriction.) In addition, the project has been designed to accommodate future streetcar projects, both from Portland to Lake Oswego and across the Sellwood Bridge.

Policy 2B: Off System Improvements

Policy 2B helps local jurisdictions adopt land use and access management policies.

This IAMP used the *City of Portland Comprehensive Plan* (City of Portland, 2006a) and City Zoning Code as the basis for land use assumptions underlying development and selection of a preferred local circulation and access management plan. The City of Portland does not have access management policies. This IAMP incorporates consideration of ODOT access management standards in future City decisions affecting land use in the IAMP study area.

Policy 2F: Traffic Safety

Policy 2F relates to improving safety of the highway system.

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

Policy 3A: Classification and Spacing Standards

Policy 3A sets access spacing standards for driveways and approaches to the state highway system.

As described earlier in these findings (see response to OTP Policy 5.1: Safety), the constrained urban environment in the OR 43: Sellwood Bridge IAMP study area precluded this IAMP from meeting ODOT access spacing standards. The preferred local circulation and access management plan moves in the direction of these standards. The plan provisions will guide subsequent access management decisions to move further toward meeting the access management standards, while allowing ODOT and the City to balance the standards against the access needs of current and future land uses.

Policy 3C: Interchange Access Management Areas

Policy 3C requires development of IAMPs to identify and address current interchange deficiencies and establish short, medium and long term solutions.

This IAMP was prepared in compliance with this policy. This plan identifies deficiencies in the OR 43: Sellwood Bridge IAMP study area and sets out short- and long-term solutions to move toward meeting ODOT standards now and in the future.

Policy 3D: Deviations

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

As described earlier in these findings (see responses to OTP Policy 5.1: Safety, OHP Policy 3A: Classification and Spacing Standards, and OHP Policy 3C: Interchange Access Management Areas), the constrained urban environment in the Sellwood Bridge/OR 43 interchange area requires that ODOT deviate from access management spacing standards. The Regional Access Management Engineer (RAME) participated in IAMP meetings. The RAME identified where local circulation and access management options would not meet standards; reviewed factors affecting the safety, efficiency, and mobility that deviations would provide; and contributed to the development of these IAMP provisions.

OAR 660, Division 12: Transportation Planning Rule

The purpose of the Transportation Planning Rule (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 may be avoided." A major purpose of the TPR is to promote more careful coordination of land use and transportation planning, to ensure that planned land uses are supported by and are consistent with planned transportation facilities and improvements. The TPR references OAR 731, Division 15, for ODOT coordination procedures related to adopting facility plans and plans for Class 1 and 3 projects.

Sections 660-012-005 through 660-012-0050

Sections 660-012-005 through 660-012-0050 of the TPR contain policies for preparing and implementing a transportation system plan.

The OR 43: Sellwood Bridge IAMP is consistent with the City's existing transportation system plan and other plans that set into place the transportation and land uses for the study area. Part 5 of Section 660-012-005 requires that cities update their TSPs and implement measures when a refinement plan has been completed. This IAMP is consistent with the City's TSP, so the City's TSP does not have to be updated.

Section 660-012-0060

Part 1 of Section 660-012-0060 requires that, where an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation would significantly affect an existing or planned transportation facility, the local government must put into place measures to assure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility.

When developing the Sellwood Bridge project and this IAMP, current and future planned land uses were considered to ensure the interchange's ability to support future land uses and traffic demands. Although this IAMP refines the OHP, it is not a plan amendment subject to this TPR element.

Oregon Administrative Rules

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

This statute regulates ODOT procedures for adopting facility plans. An IAMP is a facility plan. These procedures require that ODOT coordinate with the Oregon Department of Land Conservation

and Development (DLCD) and local government agencies during development of the plan and provide a draft of the facility plan to affected cities, counties, and other agencies for comment. The facility plan must be consistent with the statewide planning goals and local comprehensive plan policies, and findings of compatibility must be presented to the Oregon Transportation Commission for facility plan adoption.

The OR 43: Sellwood Bridge IAMP is the result of a collaborative planning effort of ODOT, the City of Portland, and Multnomah County. In addition, staff from Metro, TriMet, City of Milwaukie, and Clackamas County were involved in developing and reviewing the local circulation and access management options. Coordination with DLCD will occur during the review process of the draft plan early in 2010. Findings addressing statewide goals and requirements, as well as local plan policies, are included in this Plan and Policy Compliance appendix.

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

This statute governs the permitting, management and standards of approaches to state highways to ensure safe and efficient operation of the state highways. Policies address:

- How to bring existing and future approaches into compliance with access spacing standards
- The purpose and components of an access management plan
- Requirements regarding mitigation, modification, and closure of existing approaches as part of project development

The local circulation and access management plan component of the OR 43: Sellwood Bridge IAMP includes provisions for short- and long-term access decisions to be made prior and subsequent to reconstruction of the interchange. The current locations of the first signalized intersections and approach locations relative to the ramp terminals do not meet ODOT standards for spacing from ramp terminal intersections. However, the IAMP study area is an existing built environment, and the plan moves in the direction of the spacing standards. As land uses in the study area are redeveloped, IAMP provisions establish mechanisms for providing supplemental or alternative access to properties adjacent to OR 43 that will more closely meet spacing standards.

Metro Regional Transportation Plan

The Sellwood Bridge project is listed in the financially constrained Regional Transportation Plan (RTP; Metro 2004), and this IAMP is consistent with transportation system development principles included in the RTP.

City of Portland Transportation System Plan

The Sellwood Bridge project and this IAMP are consistent with the following *City of Portland Transportation System Plan* (City of Portland, 2006b) provisions:

- The TSP recommends replacing the existing Sellwood Bridge

- The project would allow transit service to resume across the bridge, thereby connecting SW Tacoma Street (a "transit access street" with SW Macadam Avenue (a "major transit priority street")
- The project would provide improved bicyclist and pedestrian facilities over the Willamette River

City of Portland Freight Master Plan

Replacement of the Sellwood Bridge/OR 43 interchange would improve roadway operations for large trucks by:

- Removing existing geometric deficiencies of the existing interchange
- Reducing travel time on OR 43 during peak hours
- Reducing or eliminating out-of-direction travel to and from southeast Portland neighborhoods by reinstating heavy truck use on the Sellwood Bridge (which ends on SE Tacoma Street)

Local Transportation, Land Use, and Neighborhood Plans

The circulation and access management plans of this IAMP are consistent with policies of local transportation and land use plans reviewed while preparing the *Sellwood Bridge Project Land Use Technical Report* (CH2M HILL, 2008a, updated 2010). The Sellwood Bridge project would positively impact or have no impact on applicable objectives of the following:

- Macadam Plan District
- Corbett-Terwilliger-Lair Hill Policy Plan
- Southwest Community Plan
- Sellwood-Moreland Neighborhood Plan
- Tacoma Main Street Plan
- Willamette Greenway Plan
- Willamette River Concept Plan
- South Willamette Crossing Study
- Willamette River Bridges Accessibility Project
- Parks 2020 Vision
- Bicycle Master Plans (City of Portland and Multnomah County)

Portland City Code

Title 17: Public Improvements

Title 17 requires that new residential development or development in an existing or future mixed-use area provides for street connections no further apart than 530 feet, and for bicycle and/or pedestrian connections no further apart than every 330 feet, except where prevented by barriers such as topography, railroads, freeways, pre-existing development, or natural features where regulations do not allow construction or prescribe different standards. Upon redevelopment, property owners must provide improvements as necessary to ensure that properties have direct access by frontage or recorded easement of at least 10 feet in width to a street used for vehicular traffic. The City Code

allows the construction of one driveway for each property frontage. All driveways are reviewed by the City Engineer to ensure the safe and orderly flow of pedestrian, bicycle, and vehicular traffic.

The Sellwood Bridge/OR 43 interchange is located in a natural area protected by Environmental and Greenway overlay zones. These zones severely restrict future development. Most of the land adjacent to the interchange and OR 43 in the study area is in park and cemetery use, both of which are managed for natural resource values. For these reasons, the street connection provisions of this title, for the most part, do not apply.

The City of Portland and ODOT have agreed that, as commercial properties on the east side of OR 43 between the Freeman Motor Company site and SW Miles Street redevelop, the City of Portland will require property owners to dedicate land for development of an alley, easement, or tract adjacent to their eastern boundaries for supplemental or alternative access to these properties providing that it can be demonstrated both that the dedication is justified from a public safety standpoint and that the contribution being asked of the property owners is "roughly proportional" to the impact caused by the redevelopment of the property. Absent such a showing, the City of Portland could require dedication of the alley, easement, or tract as a property "taking," if funding for property owner compensation costs is available or is provided by ODOT or another entity.

Any new approaches will meet the 10-foot-width requirement, and the alley, easement, or tract provided for alternate access will be wide enough to meet City of Portland standards, including accommodation of stormwater treatment requirements.

Continuous bicycle/pedestrian facilities will be provided throughout the IAMP study area in conjunction with construction of the Sellwood Bridge project.

Title 33: Planning and Zoning

Title 33 provides requirements related to notification of property owners affected by potential land use actions.

The IAMP framework provides for the City to notify ODOT of any proposed changes to the *Comprehensive Plan* or zoning that would affect the IAMP area. It further provides for the City to notify ODOT of any proposed changes to site circulation or existing uses of the properties ***requiring permits*** north of the interchange and south of SW Miles Street.

Under Portland's Code, land use actions, including plan and zoning amendments and actions like conditional use permits or site review, require notification to property owners within 400 feet of the subject property. Although ODOT does not own the land under OR 43, the City still notifies ODOT of land use applications because, to access the highway, the property owners must first obtain an approach permit from ODOT. Under OAR 734-051-0045(2), a change of use of an approach occurs, and an application must be submitted to ODOT, when one of seven "actions or events" results in one of five "effects" set out in the rule. The seven "actions or events" that could trigger an "effect" are:

- Zoning or plan amendment designation changes;
- Construction of new buildings;
- Floor space of existing buildings increases;
- Division or consolidation of property boundaries;
- Changes in the character of the traffic using the approach;

- Internal site circulation design or inter-parcel circulation changes; or
- Reestablishment of a property's use after discontinuance for two years or more

The five "effects" from these actions that would require permits are:

- Site traffic volume generation increases by more than 250 average daily trips or 25 peak hour trips;
- Operational problems occur or are anticipated;
- The approach does not meet sight distance requirements;
- The approach is not consistent with the safety factors set forth in OAR 734-051-0080(9): road character, traffic character, geometric character, environmental character, and operational character, or
- Use of the approach by vehicles exceeding 20,000 pound gross weight increases by 10 vehicles or more per day.

Given ODOT's safety concerns in the IAMP area, it is likely that one or more of these effects would come into play whenever these types of actions occur on the commercial or residential properties adjacent to OR 43 north of the interchange and south of SW Miles Street in the IAMP study area.

In addition to notifying ODOT concerning land use applications requiring public notice, the City routinely notifies ODOT when a proposal that would not require public notice would impact access to a state highway. These actions include applications for building permits or for a change in site circulation. To ensure that these notifications take place, as part of the IAMP implementation, the City will take the extra step of establishing a "tracking system" that places a mark on identified properties. This mark would alert City staff to inform permit applicants that they should notify ODOT about their proposals. This system will take effect when the proposal involves an outright permitted use not otherwise subject to City notification requirements.

APPENDIX E

Plan and Policy Compliance

This appendix presents information about the following relevant state, regional, and local plans and policies with information supporting the OR 43: Sellwood Bridge Interchange Area Management Plan (IAMP) compliance:

- Statewide Planning Goals
- Oregon Transportation Plan
- Oregon Highway Plan
- OAR 660 Division 12: Transportation Planning Rule
- Oregon Administrative Rules
- Metro Regional Transportation Plan
- City of Portland Transportation System Plan
- City of Portland Freight Master Plan
- Local Transportation, Land Use, and Neighborhood Plans
- Portland City Code

In reviewing these findings, it is important to recall that the Sellwood Bridge/OR 43 interchange would be built as part of the Sellwood Bridge project, which is still in the planning process. Therefore, these findings refer to activities performed and information gathered as a part of the Sellwood Bridge project process, including pending or future actions meant to achieve compliance.

Statewide Planning Goals

Oregon law requires transportation plans to comply with Oregon's statewide planning goals.

Goal 1: Citizen Involvement

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

Public involvement for the Sellwood Bridge project included:

- A Community Task Force comprised of representatives from neighborhoods; representatives of local and regional business groups; advocates for different bridge user groups, and representatives of natural resource, historic resource, and aesthetic interests. This group met 24 times, and made recommendations at each decision point throughout the project development process.

- Six public open houses and workshops throughout the project development process. These venues provided project information and gathered public feedback. On average, 150 individuals participated in each meeting, with a total meeting attendance of approximately 800 persons. A total of 260 comment forms were collected.

- An interactive project Web site with monthly project information updates. The Web site had approximately 31,800 hits, with a total of 821 comments.
- Five on-line surveys, one at each decision point in the project development process. These surveys gathered public opinions related to key project decisions. On average, 1,500 individuals participated in each survey, with a total number of 8,415 responses. Approximately 35 percent of the responders resided in the neighborhoods adjacent to the project site. The remainder of the respondents were predominately from inner and outer southeast Portland, with varying representation from Clackamas County and the rest of the Portland area.
- Five project newsletters, each to 23,000 area households. These households included 767 residences in the project vicinity and 1,323 parties who requested inclusion in the project mailing list. In addition, the newsletters and open house reminders were emailed to over 5,000 individuals who requested notification.
- Nearly 100 meetings of community organizations interested in the project.
- Twenty-eight press releases distributed to media sources. Major news media outlets covered the project in approximately 70 articles/broadcasts in 2009, 24 articles/ broadcasts in 2008, 42 articles/broadcasts in 2007, and 6 articles /broadcasts in 2006.

Public involvement activities for the OR 43: Sellwood Bridge IAMP included:

- Interviews with private property owners and agencies affected by IAMP access management and land use issues. These interviews identified their concerns.
- Individual meetings with private-property-owner stakeholders (Macadam Bay Club residents, SW Miles Place residents, and owners of River View Cemetery, Staff Jennings, Freeman Motor Company, Heuker, and Autowerks). These meetings obtained their input on initial access management options and generated other ideas for access improvements.
- Meetings with agencies and private property owners. These meetings discussed revised IAMP options.
- A public open house, which obtained public input on the final three IAMP options.

Goal 2: Land Use Planning

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

The OR 43: Sellwood Bridge IAMP was developed in accordance with the policy framework presented in these findings. For this IAMP, ODOT provided ongoing coordination and collaboration with the Sellwood Bridge project and the City of Portland. The interchange design and circulation and access management plans were coordinated with, and are consistent with, the City of Portland land use and transportation plans.

When preparing the *Sellwood Bridge Project Land Use Technical Report* (CH2M HILL, 2008a, updated 2010) and the *Sellwood Bridge Project Transportation Technical Report* (CH2M HILL et al., 2008, updated 2010) for the Sellwood Bridge Project Draft Environmental Impact Statement (DEIS; Multnomah County et al., 2008), the following plans, policies, and regulations were reviewed to determine their influence on the project and this IAMP:

- Statewide Planning Goals Oregon Transportation Plan
- Oregon Highway Plan
- OAR 660, Division 12: Transportation Planning Rule
- OAR 731-015-0065: Coordination Procedures for Adopting Final Facility Plans
- OAR 734, Division 51: Highway Approaches, Access Control, Spacing Standards and Medians
- Metro 2040 Growth Plan
- Metro Regional Framework Plan
- Metro Regional Transportation Plan
- Metro South Willamette River Crossing Study
- City of Portland Comprehensive Plan
- City of Portland Code and Charter (Zoning Code)
- City of Portland Transportation System Plan
- City of Portland Tacoma Main Street Plan
- City of Portland Corbett-Terwilliger-Lair Hill Policy Plan
- City of Portland Sellwood-Moreland Neighborhood Plan
- City of Portland Southwest Community Plan
- City of Portland Freight Master Plan
- City of Portland Parks 2020 Vision
- City of Portland Pedestrian Master Plan
- City of Portland Bicycle Master Plan
- City of Portland Scenic Resources Protection Plan
- City of Portland Willamette Greenway Plan and River Plan
- City of Portland Willamette River Bridges Accessibility Project
- City of Portland Willamette River Concept Plan
- City of Portland Zoning Code
- Multnomah County Bicycle Master Plan

The land use analysis conducted for the DEIS (CH2M HILL, 2008a, updated 2010) and reviewed during preparation of this IAMP concluded that the preferred alternative for the Sellwood Bridge project and this IAMP comply with the relevant portions of these plans and policy documents.

As part of the Sellwood Bridge project National Environmental Policy Act of 1969 (NEPA) process in which the interchange design was developed, the project provided ongoing coordination with cooperating and participating agencies at the local, state, and federal levels. These agencies included the following:

- **Federal Agencies.** Federal Emergency Management Agency, National Marine Fisheries Service, U.S. Coast Guard, U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Agency

- **Tribal Governments.** Confederated Tribes of Siletz
- **State Agencies.** Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, Oregon Department of Land Conservation and Development, Oregon Division of State Lands, Oregon State Historic Preservation Office
- **Local Agencies.** City of Milwaukie, City of Portland, Clackamas County, Metro, TriMet

As described in Appendix A, the *City of Portland Comprehensive Plan* (City of Portland, 2006a) and Portland's zoning code provided the land use component of this IAMP. A core management team comprised of representatives of the City of Portland, ODOT, and Multnomah County developed the IAMP circulation and access management plan options. Evaluation of IAMP options used the traffic estimates generated by the Metro and City of Portland traffic models.

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

This goal requires local governments to adopt programs that will protect natural resources and conserve scenic, historic and open space resources for present and future generations.

This goal includes the following resources affected by the Sellwood Bridge project—riparian corridors, wildlife habitat, natural areas, recreational trails, and cultural areas. Impacts to these resources are discussed in the *Sellwood Bridge Project Biological Resources Technical Report* (CH2M HILL, 2008b, updated 2010) and the *Sellwood Bridge Project Cultural Resources Technical Report* (CH2M HILL, 2008c, updated 2010).

The Sellwood Bridge project would remove 12.3 acres of Lowland Conifer-Hardwood Forest and 0.5 acre of Riparian vegetation. In addition, the project would disturb 11.7 acres of wildlife habitat. Mitigation measures to address these impacts have been agreed to by Portland Parks & Recreation (PP&R; owner of open space areas) and ODOT. These measures include the purchase of additional open space to replace lost natural resource values and stream restoration within the project area. PP&R has determined the preferred alternative (including mitigation measures) would result in a "net benefit" to the open space area.

The Sellwood Bridge project would require relocation of 0.3 linear mile of the existing Willamette Greenway Trail on the west side of the river, but would reconstruct this trail with a wider facility located away from OR 43.

The Sellwood Bridge project would adversely affect the historic Sellwood Bridge (it would be replaced by a new bridge), the setting of the historic River View Cemetery, and the setting of the Superintendent's House in the cemetery. Mitigation measures to address these impacts have been agreed to by the State Historic Preservation Office and ODOT, and are documented in the Sellwood Bridge Project Final Environmental Impact Statement. The preferred alternative would have the same impacts as the other Build alternatives considered in the DEIS (Multnomah County et al., 2008).

Goal 9: Economic Development

This goal requires that local comprehensive plans and policies contribute to the stable and healthy economy in all regions of the state.

The nearly 100 businesses with about 860 employees located in the Sellwood Bridge project area rely on the Sellwood Bridge/OR 43 interchange to provide access for their customer base. These businesses serve needs of nearby residents on the east and west sides of the Willamette River, customers from outside the area on both sides of the river who have targeted particular businesses for shopping or dining, and pass-by customers who use the Sellwood Bridge en route to destinations outside Sellwood. The interchange supports regional travel markets, with 52 percent of the vehicle trips between Clackamas County and Portland, 17 percent between the east side of Portland and the west side of Portland, 13 percent between Clackamas County and Washington County, 11 percent between Portland and Washington County, and 7 percent between the east side of Clackamas County and the west side of Clackamas County.

The IAMP circulation and access management plan protects the function of the interchange by serving existing and planned uses in the area, and ensuring that capacity and operations are safe and adequate for the long term. Preserving the long-term function and safety of the Sellwood Bridge/OR 43 interchange supports local and regional economic development goals and plans.

Goal 11: Public Facilities and Services

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

This IAMP provides for replacement of a substandard interchange facility with no shoulders, horizontal curve deficiencies, and inadequate bicycle and pedestrian crossing facilities. These attributes are related to the frequency of crashes, particularly during periods of congested traffic. By providing standard geometric design, the new interchange will better serve planned large truck, bus, streetcar, and bicycle and pedestrian uses.

Goal 12: Transportation

Goal 12 requires cities, counties, metropolitan planning organizations, and ODOT to provide and encourage a "safe, convenient and economic transportation system." This is accomplished through development of Transportation System Plans based on inventories of local, regional and state transportation needs. Goal 12 is implemented through the Transportation Planning Rule (TPR) that contains numerous requirements governing transportation planning and project development. The following paragraphs discuss findings of compliance with the TPR.

The Sellwood Bridge project is consistent with Goal 12 because the project is a recommendation of the City of Portland's Transportation System Plan. The transportation system incorporated into this IAMP is adequate to serve the planned land uses and to meet *Oregon Highway Plan* (ODOT, 1999) mobility standards at the ramp terminals of the Sellwood Bride/OR 43 interchange. This IAMP encourages a safe, convenient, and economic transportation system.

Goal 15: Willamette River Greenway

Goal 15 requires the protection, conservation, enhancement, and maintenance of the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

The Sellwood Bridge project would be constructed within the Willamette River Greenway and must receive a Greenway Goal Exception from the City of Portland to allow fill to be placed in the Greenway. An application has been filed and is expected to be approved. The Federal Highway Administration requires approval of the goal exception before it will issue a Record of Decision that provides final environmental approval of the Sellwood Bridge project.

Other Statewide Planning Goals

The following Statewide Planning Goals were reviewed and found not to apply to this IAMP:

- Goal 3: Agricultural Lands
- Goal 4: Forest Lands
- Goal 6: Air, Water, and Land Resources Quality
- Goal 7: Areas Subject to Natural Hazard
- Goal 8: Recreational Needs
- Goal 10: Housing
- Goal 13: Energy Conservation
- Goal 14: Urbanization
- Goal 16: Estuarine Resources
- Goal 17: Coastal Shorelands
- Goal 18: Beaches and Dunes
- Goal 19: Ocean Resources

Oregon Transportation Plan

The Oregon Transportation Plan (OTP) is the state's long-range multi-modal 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 following paragraphs discuss the most pertinent OTP goals and policies for interchange planning.

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.

The Sellwood Bridge project will replace the interchange to include improved bicycle and pedestrian facilities, to accommodate streetcar and bus transit, and to provide a hub for transfer among all the modes. Without the project, streetcar and bus transportation cannot use the interchange because of load restrictions on the Sellwood Bridge.

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.

The improvements to the interchange will facilitate intercity mobility along the OR 43 and OR 99E corridors. The access management provisions will allow flexibility for ODOT to make future access management decisions that minimize adverse effects on urban land use and travel patterns while protecting the safety of highway users.

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 efficient for the long term benefit of people and goods movement.

The *Oregon Highway Plan* (ODOT, 1999) sets the standard of volume to capacity (V/C) ratio of 0.85 or better at freeway ramp terminals. As shown in Appendix B, the grade-separated ramp terminal intersection is expected to operate with a V/C ratio of 0.82. Based on estimated motorist delay, the intersection would operate at Level of Service (LOS) D conditions (average delay of 39 seconds per motorist), which would meet City of Portland standards.

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.

Implementation of this IAMP will enable ODOT to protect the system capacity of the interchange through ongoing management of the roads that are integral to its function. To maximize the operational life of the interchange and to protect the safety of its users, the long-term provisions of this IAMP call for the creation of an alley, easement, or tract to provide alternate access to properties adjacent to OR 43 near SW Miles Street as those properties redevelop and land uses expand.

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.

Portland's *Freight Master Plan* (City of Portland, 2006b) designates SW Tacoma Street as a Truck Access Street in recognition of its service as an access circulation route for the delivery of goods and services to neighborhood-serving commercial and employment land uses. However, large trucks have been precluded from using the bridge and the interchange since the introduction of a 10-ton weight restriction on Sellwood Bridge in 2003. Interchange improvements coupled with replacement of the Sellwood Bridge will enable reintroduction of large trucks into the corridor, reducing or eliminating existing out-of-direction travel. On a daily basis, about 1,600 heavy trucks (three-axle, single-unit trucks and larger) are expected to use the interchange. Freight modes other than trucks are not affected by this IAMP.

Policy 3.2: Moving People to Support Economic Vitality

It is the policy of the State of Oregon to develop an integrated system of transportation facilities, services and information so that intrastate, interstate and international travelers can travel easily for business and recreation.

Although the interchange does not substantially support intrastate, interstate, or international travel, it does support regional commuter travel, as described in the response to Statewide Planning Goal 9: Economic Development. The Sellwood Bridge/OR 43 travelshed is critical for the efficient movement of employees to and from their jobs in the region.

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.

The Sellwood Bridge project has evaluated potential environmental impacts to natural resources including fish, wildlife, terrestrial resources, wetlands, water quality, geology, groundwater, hazardous materials, and air quality. These analyses, which are presented in the technical reports prepared to inform the DEIS, are summarized in the DEIS (Multnomah County et al., 2008).

- The Sellwood Bridge project will not affect wetlands.
- Stormwater from the existing interchange flows untreated into the Willamette River. To clean the runoff, the Sellwood Bridge project will add stormwater treatment that will adhere to local, state, and federal water quality standards.
- The few unavoidable impacts to natural resources will be mitigated through improvement to fish and terrestrial habitats at Stephens Creek and to several other unnamed streams in the project area, and through design of a wildlife-friendly retaining wall in Willamette Moorage Park.

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.

Goals of the Sellwood Bridge IAMP include ensuring safe and efficient operations between connecting roadways and protecting the function, operations, and safety of the interchange. While the constrained urban environment in the IAMP study area creates conditions that preclude this IAMP from meeting ODOT access spacing standards, the local circulation and access management plan moves in the direction of these standards. The long-term provisions also create a framework for minimizing the number of private approaches with direct access to OR 43. As commercial properties in the area redevelop and an alley, easement, or tract behind the properties adjacent to OR 43 near SW Miles Street is created, the number of potential conflicts between vehicles at non-signalized intersections will be reduced. The interchange design will greatly enhance the safety of bicycle and pedestrian facilities, and reduce the substandard geometric elements for motorized vehicles.

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.

As described earlier in these findings (see response to Statewide Planning Goal 2: Land Use Planning), development of this IAMP involved ongoing collaboration with the City of Portland and Multnomah County. The local circulation and access management plan options were evaluated for consistency with City, Metro, and Multnomah County transportation and land use plans. The preferred access management strategy seeks to balance preservation of the safety and mobility of the interchange with preservation of the existing commercial and residential uses in the corridor. The Macadam Bay Club approach will be moved farther from the interchange ramps, and one private commercial approach with direct access to OR 43 will be closed.

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.

As described earlier in these findings (see response to Statewide Planning Goal 1: Citizen Involvement), both the Sellwood Bridge project and this IAMP incorporated public involvement activities. These activities included multiple public meetings and events for the general public and stakeholders affected by this IAMP. Opportunities to offer input were provided at multiple points in the planning process.

Policy 7.4: Environmental Justice

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

The *Sellwood Bridge Project Environmental Justice Technical Report* (CH2M HILL, 2008d, updated 2010) was prepared in support of the DEIS (Multnomah County et al., 2008). The technical report documented that the percentage of minority and low-income populations in the project area is smaller than those in the Portland-Vancouver Primary Metropolitan Statistical Area. Interviews were conducted with medical, housing, and education service providers and with representatives of neighborhood associations to determine potential impacts to these populations from the Sellwood Bridge project alternatives. The environmental justice study concluded that it is unlikely the Sellwood Bridge project will result in disproportionately high and adverse effects on minority and/or low-income populations. Restoration of transit service on the bridge and through the interchange, and improvement of the bicycle and pedestrian facilities could benefit the low-income population to a greater extent than the population as a whole.

Oregon Highway Plan

The *Oregon Highway Plan* (OHP) (ODOT, 1999) establishes policies and investment strategies for Oregon's state highway system over a 20-year period and refines the OTP goals and policies. OHP policies 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 transportation systems. The following paragraphs describe the policies applicable to the OR 43: Sellwood Bridge IAMP.

Policy 1A: Highway Classification

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

The State Classification System classifies OR 43 as a District Highway (as described in Section 5, Interchange Area Management Plan of this IAMP).

Policy 1B: Land Use and Transportation

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

As described earlier in these findings (see response to Statewide Planning Goal 2: Land Use Planning), development of this IAMP involved ongoing collaboration with the City of Portland and Multnomah County. In addition, the Metro and City traffic models were used to guide the development and selection of the IAMP local circulation and access management plan options. This IAMP provides for a transportation system that is adequate to serve the planned land uses and maintain the function of the interchange.

Policy 1F: Highway Mobility Standards

Policy 1F 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.

ODOT's mobility standard for District Highways such as OR 43 is a V/C ratio of no greater than 0.85 (ODOT, 1999). Under No Project conditions in 2035, the signalized at-grade intersection along OR 43 and just north of the Sellwood Bridge would operate with a V/C ratio of 1.21, failing to meet ODOT's mobility standard and affecting through traffic on OR 43. Under Project conditions in 2035, this at-grade intersection would be removed and a grade-separated interchange would be provided. This interchange would enable unimpeded movement along OR 43. The signalized intersection at the grade-separated interchange would have a V/C ratio of 0.82, which would meet ODOT's mobility standard.

Policy 1G: Major Improvements

Policy 1G requires maintaining performance and improving safety by improving efficiency and management before adding capacity.

The Sellwood Bridge project (which necessitated this IAMP) engaged in a planning process. The result of that process was a preferred alternative that would not add capacity for motorized vehicles. It would maintain the same number of through-traffic lanes that are currently on the bridge and in the interchange. The conceptual design provides two additional lanes on the west end of the bridge to separate northbound and southbound

movements and to provide for queuing. The alignment of the OR 43 portion of the project is designed to accommodate expansion to four lanes in the future without major expense. The capacity additions to the project are provided solely through improved bicycle and pedestrian facilities, and the reintroduction of transit services. (Currently, transit services are precluded from the bridge because of a 10-ton weight restriction.) In addition, the project has been designed to accommodate future streetcar projects, both from Portland to Lake Oswego and across the Sellwood Bridge.

Policy 2B: Off System Improvements

Policy 2B helps local jurisdictions adopt land use and access management policies.

This IAMP used the *City of Portland Comprehensive Plan* (City of Portland, 2006a) and City Zoning Code as the basis for land use assumptions underlying development and selection of a preferred local circulation and access management plan. The City of Portland does not have access management policies. This IAMP incorporates consideration of ODOT access management standards in future City decisions affecting land use in the IAMP study area.

Policy 2F: Traffic Safety

Policy 2F relates to improving safety of the highway system.

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

Policy 3A: Classification and Spacing Standards

Policy 3A sets access spacing standards for driveways and approaches to the state highway system.

As described earlier in these findings (see response to OTP Policy 5.1: Safety), the constrained urban environment in the OR 43: Sellwood Bridge IAMP study area precluded this IAMP from meeting ODOT access spacing standards. The preferred local circulation and access management plan moves in the direction of these standards. The plan provisions will guide subsequent access management decisions to move further toward meeting the access management standards, while allowing ODOT and the City to balance the standards against the access needs of current and future land uses.

Policy 3C: Interchange Access Management Areas

Policy 3C requires development of IAMPs to identify and address current interchange deficiencies and establish short, medium and long term solutions.

This IAMP was prepared in compliance with this policy. This plan identifies deficiencies in the OR 43: Sellwood Bridge IAMP study area and sets out short- and long-term solutions to move toward meeting ODOT standards now and in the future.

Policy 3D: Deviations

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

As described earlier in these findings (see responses to OTP Policy 5.1: Safety, OHP Policy 3A: Classification and Spacing Standards, and OHP Policy 3C: Interchange Access Management Areas), the constrained urban environment in the Sellwood Bridge/OR 43 interchange area requires that ODOT deviate from access management spacing standards. The Regional Access Management Engineer (RAME) participated in IAMP meetings. The RAME identified where local circulation and access management options would not meet standards; reviewed factors affecting the safety, efficiency, and mobility that deviations would provide; and contributed to the development of these IAMP provisions.

OAR 660, Division 12: Transportation Planning Rule

The purpose of the Transportation Planning Rule (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 may be avoided." A major purpose of the TPR is to promote more careful coordination of land use and transportation planning, to ensure that planned land uses are supported by and are consistent with planned transportation facilities and improvements. The TPR references OAR 731, Division 15, for ODOT coordination procedures related to adopting facility plans and plans for Class 1 and 3 projects.

Sections 660-012-005 through 660-012-0050

Sections 660-012-005 through 660-012-0050 of the TPR contain policies for preparing and implementing a transportation system plan.

The OR 43: Sellwood Bridge IAMP is consistent with the City's existing transportation system plan and other plans that set into place the transportation and land uses for the study area. Part 5 of Section 660-012-005 requires that cities update their TSPs and implement measures when a refinement plan has been completed. This IAMP is consistent with the City's TSP, so the City's TSP does not have to be updated.

Section 660-012-0060

Part 1 of Section 660-012-0060 requires that, where an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation would significantly affect an existing or planned transportation facility, the local government must put into place measures to assure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility.

When developing the Sellwood Bridge project and this IAMP, current and future planned land uses were considered to ensure the interchange's ability to support future land uses and traffic demands. Although this IAMP refines the OHP, it is not a plan amendment subject to this TPR element.

Oregon Administrative Rules

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

This statute regulates ODOT procedures for adopting facility plans. An IAMP is a facility plan. These procedures require that ODOT coordinate with the Oregon Department of Land Conservation

and Development (DLCD) and local government agencies during development of the plan and provide a draft of the facility plan to affected cities, counties, and other agencies for comment. The facility plan must be consistent with the statewide planning goals and local comprehensive plan policies, and findings of compatibility must be presented to the Oregon Transportation Commission for facility plan adoption.

The OR 43: Sellwood Bridge IAMP is the result of a collaborative planning effort of ODOT, the City of Portland, and Multnomah County. In addition, staff from Metro, TriMet, City of Milwaukie, and Clackamas County were involved in developing and reviewing the local circulation and access management options. Coordination with DLCD will occur during the review process of the draft plan early in 2010. Findings addressing statewide goals and requirements, as well as local plan policies, are included in this Plan and Policy Compliance appendix.

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

This statute governs the permitting, management and standards of approaches to state highways to ensure safe and efficient operation of the state highways. Policies address:

- How to bring existing and future approaches into compliance with access spacing standards
- The purpose and components of an access management plan
- Requirements regarding mitigation, modification, and closure of existing approaches as part of project development

The local circulation and access management plan component of the OR 43: Sellwood Bridge IAMP includes provisions for short- and long-term access decisions to be made prior and subsequent to reconstruction of the interchange. The current locations of the first signalized intersections and approach locations relative to the ramp terminals do not meet ODOT standards for spacing from ramp terminal intersections. However, the IAMP study area is an existing built environment, and the plan moves in the direction of the spacing standards. As land uses in the study area are redeveloped, IAMP provisions establish mechanisms for providing supplemental or alternative access to properties adjacent to OR 43 that will more closely meet spacing standards.

Metro Regional Transportation Plan

The Sellwood Bridge project is listed in the financially constrained Regional Transportation Plan (RTP; Metro 2004), and this IAMP is consistent with transportation system development principles included in the RTP.

City of Portland Transportation System Plan

The Sellwood Bridge project and this IAMP are consistent with the following *City of Portland Transportation System Plan* (City of Portland, 2006b) provisions:

- The TSP recommends replacing the existing Sellwood Bridge

- The project would allow transit service to resume across the bridge, thereby connecting SW Tacoma Street (a "transit access street" with SW Macadam Avenue (a "major transit priority street")
- The project would provide improved bicyclist and pedestrian facilities over the Willamette River

City of Portland Freight Master Plan

Replacement of the Sellwood Bridge/OR 43 interchange would improve roadway operations for large trucks by:

- Removing existing geometric deficiencies of the existing interchange
- Reducing travel time on OR 43 during peak hours
- Reducing or eliminating out-of-direction travel to and from southeast Portland neighborhoods by reinstating heavy truck use on the Sellwood Bridge (which ends on SE Tacoma Street)

Local Transportation, Land Use, and Neighborhood Plans

The circulation and access management plans of this IAMP are consistent with policies of local transportation and land use plans reviewed while preparing the *Sellwood Bridge Project Land Use Technical Report* (CH2M HILL, 2008a, updated 2010). The Sellwood Bridge project would positively impact or have no impact on applicable objectives of the following:

- Corbett-Terwilliger-Lair Hill Policy Plan
- Southwest Community Plan
- Sellwood-Moreland Neighborhood Plan
- Tacoma Main Street Plan
- Willamette Greenway Plan
- Willamette River Concept Plan
- South Willamette Crossing Study
- Willamette River Bridges Accessibility Project
- Parks 2020 Vision
- Bicycle Master Plans (City of Portland and Multnomah County)

Portland City Code

Title 17: Public Improvements

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

The Sellwood Bridge/OR 43 interchange is located in a natural area protected by Environmental and Greenway overlay zones. These zones severely restrict future development. Most of the land adjacent to the interchange and OR 43 in the study area is in park and cemetery use, both of which are managed for natural resource values. For these reasons, the street connection provisions of this title, for the most part, do not apply.

The City of Portland and ODOT have agreed that, as commercial properties on the east side of OR 43 between the Freeman Motor Company site and SW Miles Street redevelop, the City of Portland will require property owners to dedicate land for development of an alley, easement, or tract adjacent to their eastern boundaries for supplemental or alternative access to these properties providing that it can be demonstrated both that the dedication is justified from a public safety standpoint and that the contribution being asked of the property owners is "roughly proportional" to the impact caused by the redevelopment of the property. Absent such a showing, the City of Portland could require dedication of the alley, easement, or tract as a property "taking," if funding for property owner compensation costs is available or is provided by ODOT or another entity.

Any new approaches will meet the 10-foot-width requirement, and the alley, easement, or tract provided for alternate access will be wide enough to meet City of Portland standards, including accommodation of stormwater treatment requirements.

Continuous bicycle/pedestrian facilities will be provided throughout the IAMP study area in conjunction with construction of the Sellwood Bridge project.

Title 33: Planning and Zoning

Title 33 provides requirements related to notification of property owners affected by potential land use actions.

The IAMP framework provides for the City to notify ODOT of any proposed changes to the *Comprehensive Plan* or zoning that would affect the IAMP area. It further provides for the City to notify ODOT of any proposed changes to site circulation or existing uses of the properties ***requiring permits*** north of the interchange and south of SW Miles Street.

Under Portland's Code, land use actions, including plan and zoning amendments and actions like conditional use permits or site review, require notification to property owners within 400 feet of the subject property. Although ODOT does not own the land under OR 43, the City still notifies ODOT of land use applications because, to access the highway, the property owners must first obtain an approach permit from ODOT. Under OAR 734-051-0045(2), a change of use of an approach occurs, and an application must be submitted to ODOT, when one of seven "actions or events" results in one of five "effects" set out in the rule. The seven "actions or events" that could trigger an "effect" are:

- Zoning or plan amendment designation changes;
- Construction of new buildings;
- Floor space of existing buildings increases;
- Division or consolidation of property boundaries;
- Changes in the character of the traffic using the approach;
- Internal site circulation design or inter-parcel circulation changes; or
- Reestablishment of a property's use after discontinuance for two years or more

The five "effects" from these actions that would require permits are:

- Site traffic volume generation increases by more than 250 average daily trips or 25 peak hour trips;
- Operational problems occur or are anticipated;
- The approach does not meet sight distance requirements;
- The approach is not consistent with the safety factors set forth in OAR 734-051-0080(9): road character, traffic character, geometric character, environmental character, and operational character, or
- Use of the approach by vehicles exceeding 20,000 pound gross weight increases by 10 vehicles or more per day.

Given ODOT's safety concerns in the IAMP area, it is likely that one or more of these effects would come into play whenever these types of actions occur on the commercial or residential properties adjacent to OR 43 north of the interchange and south of SW Miles Street in the IAMP study area.

In addition to notifying ODOT concerning land use applications requiring public notice, the City routinely notifies ODOT when a proposal that would not require public notice would impact access to a state highway. These actions include applications for building permits or for a change in site circulation. To ensure that these notifications take place, as part of the IAMP implementation, the City will take the extra step of establishing a "tracking system" that places a mark on identified properties. This mark would alert City staff to inform permit applicants that they should notify ODOT about their proposals. This system will take effect when the proposal involves an outright permitted use not otherwise subject to City notification requirements.