



Appendix H:

Oregon Highway Plan Findings Of Compliance

Compliance With Statewide Planning Goals

State Agency Coordination (SAC) Program Requirements

ODOT's certified State Agency Coordination (SAC) Program and Oregon Administrative Rules Chapter 31, Division 15, describe the procedures that ODOT will follow when developing and adopting plans to assure that they comply with the statewide planning goals and are compatible with acknowledged comprehensive plans. The SAC Program recognizes that planning occurs in stages and that compliance and compatibility obligations depend on the stage of planning being undertaken. The SAC Program describes the process as follows:

“ODOT's program for assuring compliance and compatibility recognizes the successive stages of transportation planning and establishes a process that coordinates compliance and compatibility determinations with the geographic scale of the plan and the level of detail of information that is available. At each planning stage, some compliance and compatibility issues come into focus with sufficient clarity to enable them to be addressed. These issues shall be resolved at that time. Other issues may be apparent but not seen clearly enough to determine compliance and compatibility. These issues shall be resolved in subsequent planning stages and any plan decisions that depend on their resolution shall be contingent decisions. The result of this successive refinement process shall be the resolution of all compliance and compatibility issues by the end of the project planning stage of the transportation planning program.

“The department's coordination efforts at the transportation policy plan and modal systems plan stages will be directed at involving metropolitan planning organizations, local governments and others in the development of statewide transportation policies and plans. Since these plans have general statewide applicability and since ODOT has the mandate under ORS 184.618 to develop such plans, compatibility with the comprehensive plan provisions of specific cities and counties will not be generally established. However, compatibility

determinations shall be made for new facilities identified in modal systems plans that affect identifiable geographic areas. Compliance with any statewide planning goals that specifically apply will be established at these planning stages.

“The focus of the department’s efforts to establish compatibility with acknowledged comprehensive plans will be at the facility planning and project planning stages of the planning program. At these stages, the effects of the department’s plans are more regional and local in nature, although some statewide effects are also present.”

- At the beginning of the Highway Plan process, the Department organized four policy advisory committees to develop the draft goals and policies. The 54 members of the committees represented ODOT managers, state and federal agencies, Indian tribal governments, metropolitan planning organizations, cities, counties, business and transportation industry users and providers, and environmental and public interest organizations. Each committee met from four to seven times in 1997 and 1998 to formulate the goals, policies and actions that form the Policy Element of the Plan. Each committee was chaired by an ODOT manager and supported by ODOT technical staff and the consulting team.
- The Highway Plan Steering Committee provided direction to the policy and investment strategy development. The Committee, chaired by a Transportation Commission member, included representatives of cities, counties, metropolitan planning organizations, the Governor’s office and highway users, and met 10 times during the plan’s development.
- Public review of the plan included two series of statewide meetings. The public review of the Policy Element in spring 1998 included 12 public meetings, 6 regional workshops for local government officials, and over 30 presentations to government bodies and business and civic organizations. The review of the System Element in September-October 1998 involved 22 public meetings throughout the state. Press releases, ads and newspaper articles publicized the meetings and the issues. Two newsletters outlined the issues for local governments and any interested parties. The staff summarized the written and oral comments received during the public review and recommended changes in the draft policies and investment strategies to the policy advisory committees and Steering Committee.
- The Transportation Commission conducted a public hearing on the draft plan on Wednesday, January 20, 1999. The Commission considered changes to the draft plan based on the public hearing at their meeting on January 21.
- The draft plan and the draft findings of compliance with the applicable statewide planning goals were presented to the Transportation Commission at their meeting on January 21, 1999.

- Findings of compliance with statewide planning goals were adopted as part of the final Highway Plan on March 18, 1999.
- Copies of the adopted Oregon Highway Plan will be distributed to DLCD, cities, counties, metropolitan planning organizations and participating state agencies, as well as to all interested persons and agencies who request copies.

Transportation Planning Rule

The Land Conservation and Development Commission adopted the Transportation Planning Rule (OAR 660-12) to implement Statewide Planning Goal 12 (Transportation) and “to explain how local governments and state agencies responsible for transportation planning demonstrate compliance with other statewide planning goals.”

The Transportation Planning Rule describes transportation planning as follows (Section 010):

“(1) As described in this division, transportation planning shall be divided into two phases: transportation system planning and transportation project development. Transportation system planning establishes land use controls and a network of facilities and services to meet overall transportation needs. Transportation project development implements the Transportation System Plan (TSP) by determining the precise location, alignment and preliminary design of improvements included in the TSP.”

Section 15 of the Transportation Planning Rule recognizes that ODOT’s TSP is composed of a number of elements as described in the Department’s State Agency Coordination (SAC) Program.

“(1)(a) The state TSP shall include the state transportation policy plan, modal systems and transportation facility plans as set forth in OAR 731, Division 15.”

The Oregon Highway Plan is an ODOT modal system/topic plan. The system plan is described in the SAC Program as follows:

“These are the overall plans and policies for each mode of transportation. These plans evaluate system wide needs for transportation services, identify and classify facilities by function and importance to meet the needs, and establish policies for the system and each class of facilities. These policies may cover topics such as prioritization of resources across the system; allocation of resources between maintenance, preservation, operation and modernization; operational goals for classes of facilities; and relationship of facilities categories to land use. Modal Systems Plans are adopted by the Transportation Commission.”

The Highway Plan evaluates system-wide needs, classifies facilities by function, establishes policies for the system, allocates resources, and outlines the relationship of facilities categories to land use.

Section 15 of the TPR describes ODOT planning responsibilities under the statewide planning goals.

“(1) ODOT shall prepare, adopt and amend a state TSP in accordance with ORS 184.618, its program for state agency coordination certified under ORS 197.180, and OAR 660-12-030, 035, 050, 065 and 070. The state TSP shall identify a system of transportation facilities and services adequate to meet identified state transportation needs.”

Following are findings relating to each of the above sections of the TPR that apply to ODOT.

Section 030 - Determination of Transportation Needs

Section 030 identifies the basic requirements for determining transportation needs as follows:

“(1) The TSP shall identify transportation needs relevant to the planning area and the scale of the transportation network being planned including:

(a) State, regional and local transportation needs.

(b) Needs of the transportation disadvantaged.

(c) Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR 660-09 and Goal 9 (Economic Development).”

Since the Oregon Highway Plan is at a statewide scale, it addresses the current status of highway service in the state and identifies system deficiencies to assist ODOT with management priorities and with its forecasts of transportation funding needs.

The determination of transportation needs included in this Plan is appropriate and sufficient for the level of decision-making provided in the Plan. The needs analysis is based on projected traffic volumes, deterioration rates, deficiency analysis, safety analysis and transportation system plans. It includes capacity-adding projects, pavement preservation, bridge preservation, operations and safety improvements, and maintenance and planning needs in the aggregate at the statewide level.

The Plan addresses the needs of the transportation disadvantaged by emphasizing facilities for transit riders, pedestrians and bicyclists in Policy 1B.

The Plan addresses the needs for the movement of goods and services by establishing a state freight system, addressing freight efficiency in Policy 4A, requiring higher highway mobility standards for freight routes in Policy 1F, and calling for investing in thicker pavements on freight routes.

Section 035 - Evaluation and Selection of Transportation System Alternatives

Section 035 contains requirements for evaluating and selecting transportation system alternatives.

“(1) The TSP shall be based upon evaluation of potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology. The following shall be evaluated as components of system alternatives:

- (a) Improvements to existing facilities and services;
- (b) New facilities and services, including different modes or combinations of modes that could reasonably meet identified transportation needs;
- (c) Transportation system management measures;
- (d) Demand management measures; and
- (e) A no-build system alternative required by the National Environmental Policy Act of 1969 or other laws.”

The Major Improvements Policy (Policy 1G) requires evaluation of these alternatives in addressing highway problems.

This section of the TPR also contains the following standards for evaluating transportation system alternatives:

- “(3) The following standards shall be used to evaluate and select alternatives:
- (a) The transportation system shall support urban and rural development by providing types and levels of transportation facilities and services appropriate to serve the land uses in the acknowledged comprehensive plan.
 - (b) The transportation system shall be consistent with state and federal standards for protection of air, land and water quality including the State Implementation Plan under the Federal Clean Air Act and State Water Quality Management Plan.
 - (c) The transportation system shall minimize adverse economic, social, environmental and energy consequences.
 - (d) The transportation system shall minimize conflicts and facilitate connections between modes of transportation.

(e) The transportation system shall avoid principal reliance on any one mode of transportation and shall reduce principal reliance on the automobile. In MPO areas this shall be accomplished by selecting transportation alternatives which meet the requirements in 660-12-035(4).”

The Highway Plan is in line with these standards in several policies:

- The Land Use/Transportation Policy (Policy 1B), Highway Mobility Standards (Policy 1F), and Access Management Policies (Policies 3A, 3B, and 3C) provide types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan.
- Goal 5 for Environmental and Scenic Resources would protect or enhance the natural and built environment throughout the process of constructing, operating, and maintaining the state highway system and emphasizes compliance with state and federal standards for the protection of air, land and water quality.
- While Goal 5 (Environmental and Scenic Resources) and Policy 4D (Transportation Demand Management) specifically address environmental and energy issues, the plan as a whole seeks to enhance system efficiency and safety and minimize adverse economic, social, environmental and energy consequences.
- The Highway Plan addresses problems regarding conflicts between modes and connections between modes in Policies 1B (Land Use/Transportation), 2G (Rail and Highway Compatibility), 4A (Efficiency of Freight Movement), and 4B (Alternative Passenger Modes).
- The Highway Plan is a modal plan that addresses use of the highway, but recognizes the importance of other modes in reducing reliance on the automobile. (See Policies 4A Efficiency of Freight Movement, 4B Alternative Passenger Modes, 4D Transportation Demand Management, 4E Park-and-Ride Facilities.)

ODOT will apply the standards in Section 035 as it develops corridor plans and as it works with local governments to develop local TSPs.

Section 050 - Transportation Project Development

This section contains requirements for transportation project development and references ODOT’s administrative rule for state agency coordination OAR 731 Division 15. The Highway Plan does not refer to any transportation projects.

Section 065 - Transportation Improvements on Rural Lands

This section includes requirements for making transportation improvements on rural lands. The Highway Plan does not identify any specific improvements on rural lands. Access management policies and standards (Policies 3A, 3B, and 3C) are consistent with Section 065. Specific highway improvements will be proposed

through corridor plans or TSPs, and compliance with the TPR provisions will be addressed at that time.

Section 070 - Exceptions for Transportation Improvements on Rural Lands

The Highway Plan does not identify any improvements on rural lands. Specific highway improvements will be proposed through corridor plans or TSPs, and compliance with the TPR provisions will be addressed at that time.

Statewide Planning Goals

Goal 1 (Citizen Involvement) and Goal 2 (Land Use Planning) are addressed by ODOT's SAC Program. ODOT has complied with these goals by following its SAC Program procedures as described above.

The SAC Program describes a process of going from the general to the specific. The Highway Plan is a modal/topic plan which addresses system-wide management strategies and policies. It does not identify specific areas that would be affected by improvements. Accordingly, several land specific goals do not apply. These include:

- Goal 3 (Agricultural Land)
- Goal 4 (Forest Lands)
- Goal 5 (Open Spaces, Scenic and Historic Areas, and Natural Resources)
- Goal 7 (Areas Subject to Natural Disasters and Hazards)
- Goal 15 (Willamette River Greenway)
- Goal 16 (Estuarine Resources)
- Goal 17 (Coastal Shorelands)
- Goal 18 (Beaches and Dunes)

According to the SAC Program, these goals will be addressed during the development of facility plans such as corridor plans and project plans when specific future improvements and geographic impacts are identified.

Two goals have an indirect relationship to the Oregon Highway Plan in that they have some connection to the evaluation of needs. The requirements of these goals, however, have no direct bearing on the Highway Plan. These are:

Goal 8 (Recreational Needs)

Goal 10 (Housing)

A number of goals do affect system-wide planning. These include:

Goal 6 (Air, Water and Land Resources Quality)

Goal 9 (Economic Development)

Goal 11 (Public Facilities and Services)

Goal 12 (Transportation)

Goal 13 (Energy Conservation)

Goal 14 (Urbanization)

These goals are all addressed by TPR requirements.

FINDINGS OF COMPLIANCE WITH THE OREGON TRANSPORTATION PLAN

The Purpose

One of the purposes of the Oregon Highway Plan is to meet the requirements of the Oregon Transportation Plan for a modal/topic plan for the state highway system. It provides more detailed policies, actions and strategies for the state highway system. The Oregon Highway Plan is considered an element of the unified transportation plan as described in the State Agency Coordination Program, December 1990.

The Process: Highway Plan Advisory Committees

The four Highway Plan policy advisory committees and Steering Committee that participated in, and provided guidance to, the Plan's development have been described above under State Agency Coordination Program.

Public Involvement

The development of the Oregon Highway Plan has involved extensive public involvement throughout the process. Newsletters, press releases, newspaper articles, and the Highway Plan Website announced each of the two series of public meetings to review the policies and investment strategies. Public Review Draft One (focusing on the Policy Element), Public Review Draft Two (the Policy and System Elements), and

the Public Hearing Draft were widely circulated to citizens, organizations, regional and local governments and state agencies for their comment. About 1000 people, including ODOT employees, participated in over 50 meetings throughout the state on the Policy Element in the spring of 1998. Six of these meetings were regional workshops for local government officials. About 360 citizens and local governments participated in the review of the plan at 22 public meetings during the fall of 1998. The staff had additional meetings with business and regional and local government groups throughout the planning process.

ODOT staff compiled the oral and written comments made during the public review periods and recommended changes to plan concepts and language to the advisory committees and Oregon Transportation Commission.

The Transportation Commission held a public hearing on the plan on January 20, 1999, and modified the plan in response to written and oral comments.

Oregon Transportation Plan Goals and Policies

The Oregon Highway Plan delineates and expands all of the policies in the Oregon Transportation Plan related to the highway system except for the financial policies (Policies 4A, 4D, and 4F). The Highway Plan does not address these financial policies because it does not advocate a funding package. The following are examples of policies in the Oregon Highway Plan that elaborate OTP policies:

RELATIONSHIP OF OTP AND OHP POLICIES	
OTP Policy	OHP Policies
Policy IA - Balance	Policy 1B - Land Use/Transportation Policy 4B - Alternative Passenger Modes
Policy B - Efficiency	Policy 1G - Major Improvements Policy 4D - Transportation Demand Management
Policy 1C - Accessibility	Policy B - Land Use/Transportation
Policy 1D - Environmental Responsibility	Policy 5A - Environmental Resources
Policy 1E - Connectivity Among Places	Policy 1A - State Highway Classification System Policy 1C - State Highway Freight System
Policy 1F - Connectivity Among Modes	Policy 4A - Efficiency of Freight Movement Policy 4B - Alternative Passenger Modes
Policy 1G - Safety	Policy 2F - Traffic Safety Policy 2G - Rail and Highway Compatibility
Policy 1H - Financial Stability	Investment Policy in System Element
Policy 2A - Land Use	Plan as a whole Policy B - Land Use/Transportation
Policy 2B - Urban Accessibility	Policy 1B - Land Use/Transportation
Policy 2C - Relationship of Interurban & Urban Mobility	Policy B - Land Use/Transportation Policy 1F - Highway Mobility Standards Policy 3A, 3C - Access Management
Policy 2D - Facilities for Pedestrians & Bicyclists	Policy B - Land Use/Transportation
Policy 2E - Minimum Levels of Service Policy 2F - Rural Mobility	Policy IA - State Highway Classification System Policy 1C - State Highway Freight System

RELATIONSHIP OF OTP AND OHP POLICIES cont.	
OTP Policy	OHP Policies
Policy 2G - Regional Differences	Policy 1B - Land Use/Transportation Policy 1F - Highway Mobility Standards
Policy 2H - Aesthetic Values	Policy 5B - Scenic Resources
Policy 3A - Balanced & Efficient Freight System	Policy 4A - Efficiency of Freight Movement
Policy 3B - Linkages to Markets	Policy 1C - State Highway Freight System
Policy 3D - Intermodal Hubs	Policy 4A - Efficiency of Freight Movement
Policy 3E - Tourism	Policy 1D - Scenic Byways Policy 5B - Scenic Resources
Policy 4G - Management Practices	Investment Policy Policy 1G - Major Improvements Policy 4D - Transportation Demand Management
Policy 4M - Private/Public Partnership	Policy 2A - Partnerships
Policy 4N - Public Participation Policy 40 - Public Information & Education	Policy 2D - Public Involvement

The Highway Plan does not address the highway-related Action 2B.2 in the OTP that says “Give preference to projects and assistance grants that support compact or infill development or mixed use projects.” This action can be addressed in Transportation Commission policy beyond the Highway Plan.