DATE: **April 13, 2010**

TO: **Oregon Transportation Commission**

FROM: **Matthew L. Garrett, Director**

SUBJECT: **OR 43: Sellwood Bridge Interchange Area Management Plan**

Requested action:

Adopt the *OR 43: Sellwood Bridge Interchange Area Management Plan* (IAMP) as an amendment to the *Oregon Highway Plan* and adopt the findings in support of this action.

Summary of issues:

The *OR 43: Sellwood Bridge IAMP* has been developed in conjunction with the Sellwood Bridge project, which is currently in the late stages of the environmental review process. The Sellwood Bridge project includes replacement of the Sellwood Bridge and reconstruction of the interchange with OR 43 (SW Macadam Avenue).

The adopted *City of Portland Comprehensive Plan* (2006a) and zoning designations provide the land use component of the IAMP. The IAMP circulation and access management provisions were developed to serve existing and future development as allowed under the *Comprehensive Plan*. The IAMP identifies a local circulation and access management concept for the businesses, residences, and parklands in the interchange area, along with implementation actions.

The *OR 43: Sellwood Bridge IAMP* and all appendices can be found at:
http://www.sellwoodbridge.org/IAMP.aspx

Attachments:

A. Staff report
B. Findings
C. *OR 43: Sellwood Bridge Interchange Area Management Plan*
D. City of Portland Concurrence Letter

Copies with attachments to:
Doug Tindall
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Rian Windsheimer
Lainie Smith
Bob Cortright, DLCD

Attachment A: Staff Report

Background. The *OR 43: Sellwood Bridge Interchange Area Management Plan* (IAMP) was developed in conjunction with the Multnomah County Sellwood Bridge project, which is currently in the late stages of the environmental review process. The Sellwood Bridge project includes replacement of the Sellwood Bridge and reconstruction of the bridgehead interchange with OR 43 (Macadam Avenue).

The Sellwood Bridge connects Oregon 43 (OR 43, SW Macadam Avenue) on the west side of the Willamette River with SE Tacoma Street on the east side of the river. OR 43 runs north-south between the cities of Portland and Oregon City, traveling through Lake Oswego and West Linn. SE Tacoma Street connects with OR 99E (SE McLoughlin Boulevard). The Sellwood Bridge links city of Portland neighborhoods on the east and west side of the river and provides an important connection for the cities of Milwaukie and Lake Oswego.

The function of the Sellwood Bridge/OR 43 interchange (below) is to serve existing land uses on OR 43 between SW Taylors Ferry Road/SW Miles Street and SW Radcliffe Road, as well as local and regional travel markets between east and west Portland; Portland and Washington County; Clackamas County and Washington County; Clackamas County and Portland; and east and west Clackamas County.

The function is not to provide for additional commercial development within the management area beyond what is allowed under current comprehensive-plan and zoning designations.

Issues. The IAMP needed to find a balance between 1) limiting approaches that degrade the safety and mobility of interchange operations, particularly in locations closest to on- and off-ramps; 2) maintaining access important to the local business and residential communities; 3) minimizing impacts to sensitive environmental areas and habitats; and 4) provide access to businesses, residences, parklands, bicycle/pedestrian facilities, and future streetcar facilities within a very small area. The local circulation and access management plan balances these needs.

Public involvement process. A subgroup of the Sellwood Bridge Project Management Team (comprised of representatives from Multnomah County, ODOT, City of Portland, and the Sellwood Bridge project team), was designated to provide leadership to develop the IAMP. This core team conducted interviews with affected private property owners and agencies to identify stakeholder concerns related to existing access to SW Macadam Avenue (OR 43) and changes that could result from the Sellwood Bridge project. After public agency stakeholders developed and refined several circulation and access management concepts, the IAMP core team held individual meetings with affected private property owners to obtain input on these concepts, generate other ideas for access improvements, and get further input on new and refined options emerging from the first round of discussions. In an open house held in the IAMP study area in July 2009, interested parties reviewed the final three options and provided their input. The access concept forming the basis of the IAMP was then presented at a Sellwood Bridge Project open house in September.

The public notification and review periods for the *OR 43: Sellwood Bridge IAMP* began on March 29, 2010, when the draft IAMP was placed on the Sellwood Bridge project website for public review, and State Agency Coordination notification required by OAR 731-015 was provided on April 8, 2010. Project stakeholders receiving notification included affected property and business owners involved during IAMP development, the City of Portland, Multnomah County, the Department of Land Conservation and Development, and attendees of the July 2009 IAMP Open House. Notification was conducted via letters, with information given on how to view and comment on the IAMP. An informational open house has also been scheduled for April 20 for affected property and business owners to review the selected access concept and comment on the IAMP.

ODOT responsibilities. After the Federal Highway Administration (FHWA) issues a Record of Decision selecting the Sellwood Bridge project's preferred alternative, ODOT will develop an Access Management Strategy for the interchange area consistent with the provisions established in the IAMP. The Access Management Strategy will consist of actions that occur within the highway right-of-way that ODOT has the authority to implement, and that will be taken during project construction. ODOT will conduct these activities in consultation with the City of Portland and Multnomah County. After project construction in the interchange area is completed, ODOT will make access

management decisions consistent with the IAMP and OAR 734-051. These specific measures are detailed on page 37 and 38 of the IAMP.

Sellwood Bridge Project responsibilities. The Sellwood Bridge Project will be responsible for:

- Acquiring right-of-way for project construction.
- Constructing changes to private property approaches as documented in the Access Management Strategy.

Local government responsibilities. The IAMP relies on the *City of Portland Comprehensive Plan*. The City of Portland will be responsible for:

- Participating in the development of the Access Management Strategy.
- Coordinating with ODOT through access permitting, building permitting, and land use decision processes in the interchange management area.

Amendments with this action. No policies, standards, actions, appendices, maps, or other exhibits are being amended with this action.

Summary of draft findings. The draft findings (Attachment B) describe the IAMP's compliance with the applicable Statewide Land Use Goals; the Oregon Transportation Plan; the Oregon Highway Plan, OAR 660-012 (the Transportation Planning Rule); OAR 731-015-0065 (Coordination Procedures for Adopting Final Facility Plans); OAR 731-051 (Highway Approaches, Access Control, Spacing Standards and Medians); the 2035 Metro Regional Transportation Plan; the City of Portland Transportation System Plan; the City of Portland Freight Master Plan; local Land Use, and Neighborhood Plans; and the Portland City Code.

As described in the findings (Attachment B), the IAMP complies with applicable OHP policies and actions. The IAMP was developed with evaluation factors reflecting the OHP classification OR 43 as a District Highway. The IAMP was developed by a project team including ODOT, City of Portland, and Multnomah County staff, and it provides for a transportation system that is adequate to serve the planned land uses and maintain the function of the interchange. The IAMP seeks to manage the interchange area in a way that will protect the function of the interchange for the life of the investment and addresses safety by moving in the direction of access spacing standards and establishing access management general provisions that minimize potential traffic conflicts in the interchange area.

Requested action. Adopt the *OR 43: Sellwood Bridge IAMP* as an element of the Oregon Highway Plan and adopt the findings in support of this action.

OR 43: Sellwood Bridge Interchange Area Management Plan

Portland, Oregon

Prepared for

Oregon Department of Transportation

May 11, 2010

Prepared by

CH2MHILL
Portland, Oregon

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Contents

Appendixes

Table

Figures

Acronyms and Abbreviations

DEIS	Sellwood Bridge Project Draft Environmental Impact Statement (Multnomah County et al., 2008)
DLCD	Department of Land Conservation and Development
FEIS	Final Environmental Impact Statement
IAMP	OR 43: Sellwood Bridge Interchange Area Management Plan
IV	Indicator Value
IV_{Freq}	Crash Frequency
IV_{Rate}	Crash Rate
$IV_{Severity}$	Crash Severity
LOS	Level of Service
mph	miles per hour
NEPA	National Environmental Policy Act of 1969
OAR	Oregon Administrative Rule
ODOT	Oregon Department of Transportation
OHP	*Oregon Highway Plan* (ODOT, 1999)
OR 43	Oregon 43
OR 99E	Oregon 99E
OTP	Oregon Transportation Plan
PP&R	Portland Parks & Recreation
project area	Sellwood Bridge project area
RAME	Regional Access Management Engineer
RTP	Regional Transportation Plan
SAS	Senior Agency Staff
SPIS	Safety Priority Index System
study area	smaller area than the Sellwood Bridge project area within which the IAMP solutions are located
TPR	Transportation Planning Rule
TSP	transportation system plan
V/C ratio	volume to capacity ratio

SECTION 1

Introduction

The OR 43: Sellwood Bridge Interchange Area Management Plan (IAMP) has been prepared for the Sellwood Bridge project, which would replace the Sellwood Bridge crossing of the Willamette River in Portland, Oregon. The bridge connects Oregon 43 (OR 43, SW Macadam Avenue) on the west side of the river with Oregon 99E (OR 99E) by way of SE Tacoma Street on the east side of the river. OR 43 runs north-south between the cities of Portland and Oregon City, traveling through Lake Oswego and West Linn. On the east side of the river, the bridge transitions into SE Tacoma Street. At its east end, SE Tacoma Street connects with OR 99E (SE McLoughlin Boulevard). Figure 1 shows the location of the project.

The next closest crossings over the Willamette River are about 2.5 miles north at the Ross Island Bridge and about 8 miles south at the Interstate 205 crossing. The Sellwood Bridge links the Sellwood, Westmoreland, and Milwaukie areas with OR 43 and southwest Portland, downtown Portland, and Lake Oswego.

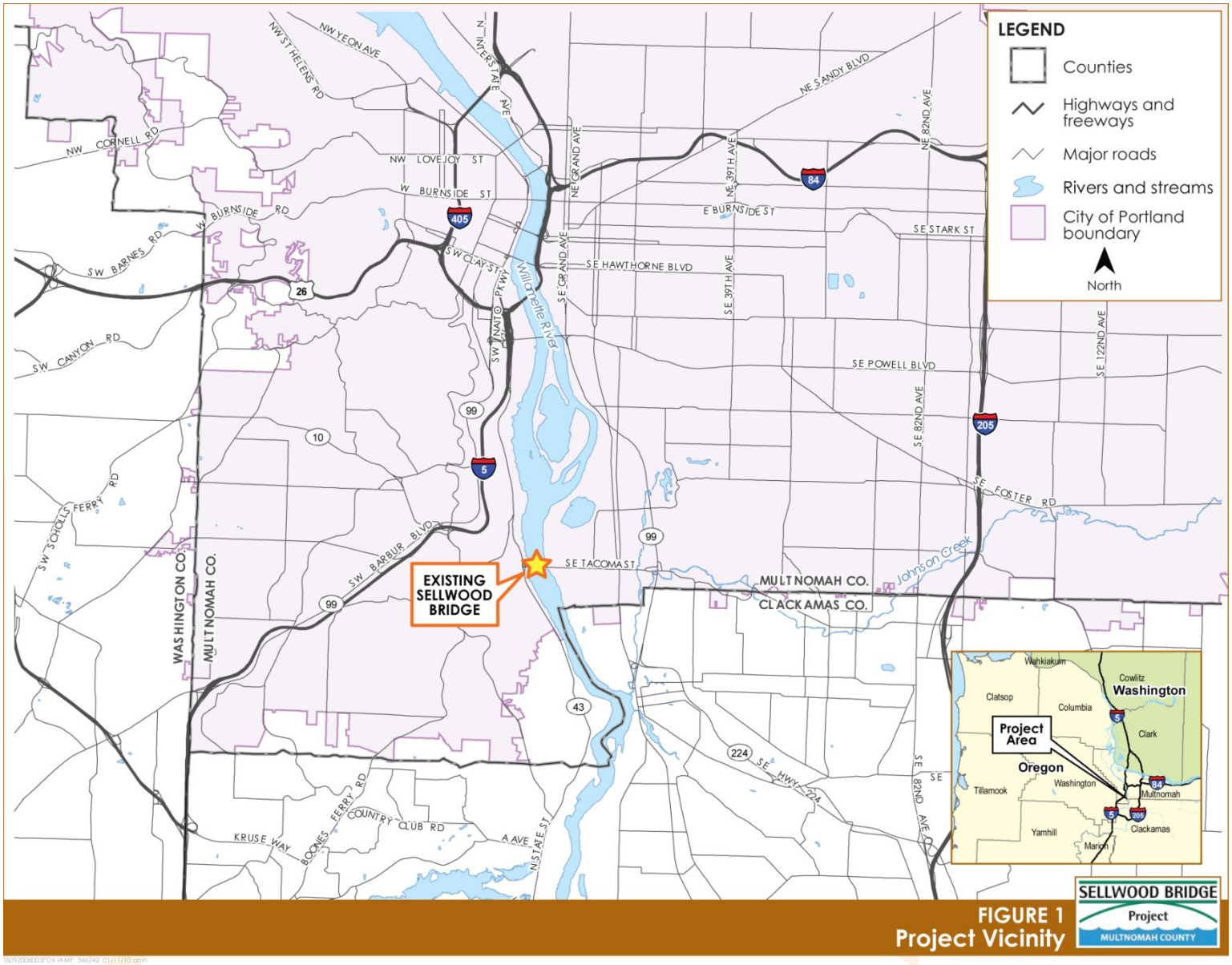
The interchange concept and land use framework in this IAMP are based on work conducted as part of the Sellwood Bridge project. The project included extensive public and agency outreach that led to a consensus recommendation by Multnomah County, Oregon Department of Transportation (ODOT), City of Portland, and Clackamas County on the preferred interchange concept (shown on Figure 2). As a result, the public and agency process associated with this IAMP was focused solely on access management and multi-modal circulation issues related to implementation of the preferred alternative for the Sellwood Bridge project. The Sellwood Bridge Project Draft Environmental Impact Statement (DEIS; Multnomah County et al., 2008) provides complete documentation of the project development.

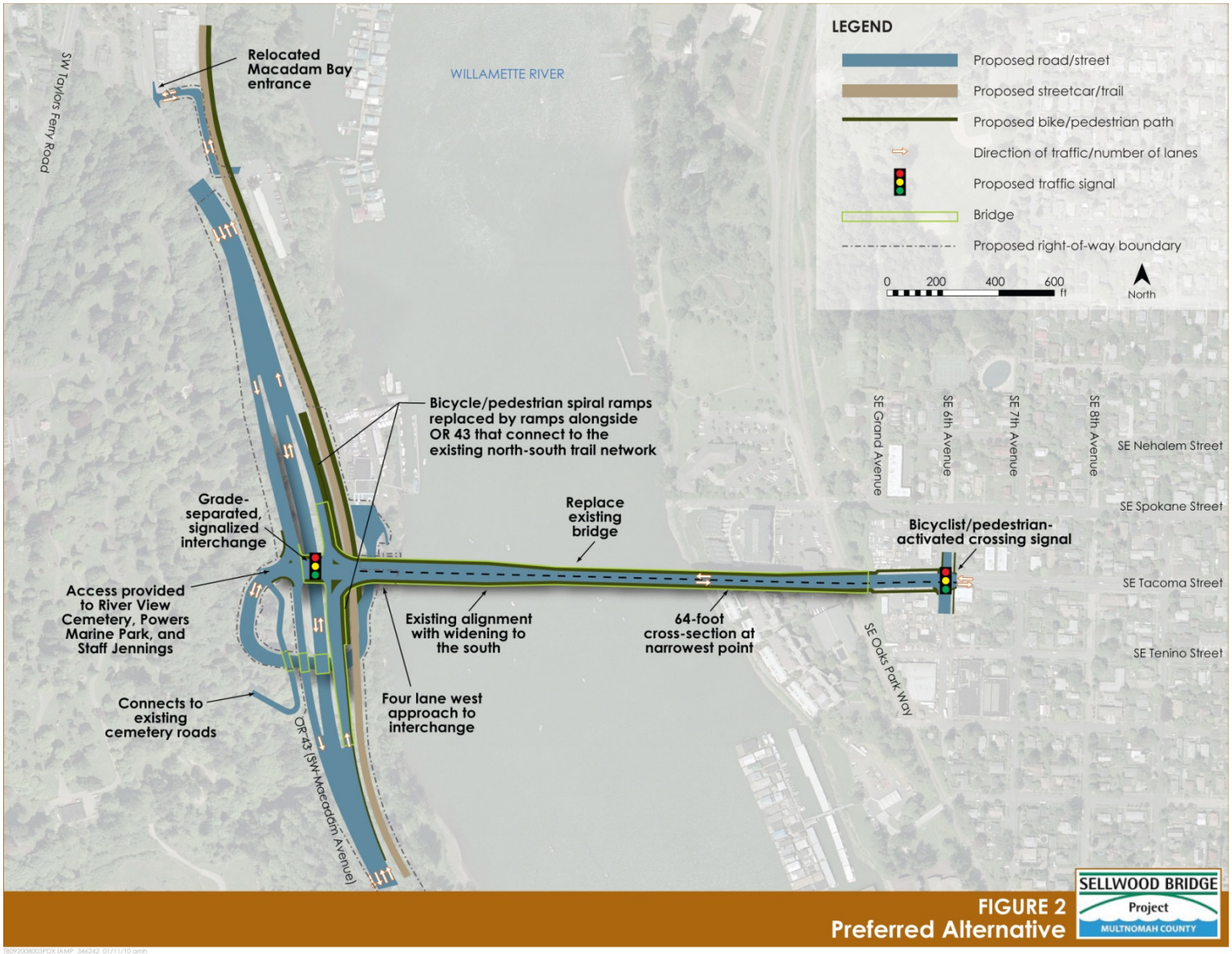
IAMP Purpose and Compliance Criteria

Oregon Administrative Rule (OAR) 734-051-0155 requires that an IAMP be prepared for any new interchange and recommends an IAMP for significant modifications to existing interchanges. The purpose of an IAMP is to ensure safe and efficient operations between connecting roadways, to protect the function of the interchange, and to minimize the need for future major interchange improvements. Because new interchanges are very costly, state and local governments and citizens have an interest in ensuring that they function as intended and for as long a period as possible, while still supporting planned land use.

OAR 734-051-0155 requires an IAMP to comply with the following criteria, unless the plan documents why compliance with a criterion is not applicable:

- Be developed no later than the time an interchange is designed or is being redesigned
- Identify opportunities to improve operations and safety in conjunction with roadway projects and property development or redevelopment and adopt policies, provisions, and development standards to capture those opportunities


LEGEND
Counties
Highways and freeways
Major roads
Rivers and streams
City of Portland boundary
North
EXISTING SELLWOOD BRIDGE
WASHINGTON CO.
MULTNOMAH CO.
CLACKAMAS CO.
Willamette River
Johnson Creek
NW YEON AVE
NW ST HELENS RD
NW CORNELL RD
NW LOVEJOY ST
W BURNSIDE ST
W BURNSIDE RD
SW BARNES RD
SW CANYON RD
SW CLAY ST
SW NAITO PKWY
SW SCHOLLS FERRY RD
SW BARBUR BLVD
N INTERSTATE AVE
NE GRAND AVE
SE GRAND AVE
NE SANDY BLVD
NE 82ND AVE
NE 39TH AVE
E BURNSIDE ST
SE STARK ST
SE HAWTHORNE BLVD
SE 39TH AVE
SE POWELL BLVD
SE 82ND AVE
SE 122ND AVE
SE FOSTER RD
SE TACOMA ST
SE 82ND AVE
SE HWY 224
KRUSE WAY
BOONES FERRY RD
COUNTRY CLUB RD
A AVE
N STATE ST
Project Area
Oregon
Washington
Clatsop
Columbia
Tillamook
Yamhill
Marion
Clackamas
Multnomah
Clark
Cowlitz
Wahkiakum
FIGURE 1
Project Vicinity
SELLWOOD BRIDGE
Project
MULTNOMAH COUNTY


LEGEND
Proposed road/street
Proposed streetcar/trail
Proposed bike/pedestrian path
Direction of traffic/number of lanes
Proposed traffic signal
Bridge
Proposed right-of-way boundary
0 200 400 600 ft
North
WILLAMETTE RIVER
SW Taylors Ferry Road
Relocated Macadam Bay entrance
Bicycle/pedestrian spiral ramps replaced by ramps alongside OR 43 that connect to the existing north-south trail network
Grade-separated, signalized interchange
Replace existing bridge
Bicyclist/pedestrian-activated crossing signal
Access provided to River View Cemetery, Powers Marine Park, and Staff Jennings
Existing alignment with widening to the south
64-foot cross-section at narrowest point
Connects to existing cemetery roads
Four lane west approach to interchange
OR 43 (SW Macadam Avenue)
SE Grand Avenue
SE 6th Avenue
SE 7th Avenue
SE 8th Avenue
SE Nehalem Street
SE Spokane Street
SE Tacoma Street
SE Tenino Street
SE Oaks Park Way
FIGURE 2
Preferred Alternative
SELLWOOD BRIDGE Project
MULTNOMAH COUNTY

- Include short, medium, and long-range actions to improve operations and safety within the designated study area
- Consider current and future traffic volumes and flows, roadway geometry, traffic control devices, current and planned land uses and zoning, and the location of all current and planned approaches
- Provide adequate assurance of the safe operation of the facility through the design traffic forecast period, typically 20 years
- Consider existing and proposed uses of all the property within the designated study area consistent with its comprehensive plan designations and zoning
- Be consistent with any applicable Access Management Plan, corridor plan or other facility plan adopted by the Oregon Transportation Commission
- Include policies, provisions, and standards from local comprehensive plans, transportation system plans, and land use and subdivision codes that are relied upon for consistency and that are relied upon to implement the IAMP

Problem Statement

An inherent tension exists between the effective functioning of the interchange and the access to local businesses, residences, and other land uses in the area. The primary concerns for interchange operations are safety and mobility. These concerns are best served by:

- Minimizing the number of approaches and connections to OR 43 within the interchange influence area, particularly in locations closest to on- and off-ramps
- Developing alternative access through the local street system, where possible

In contrast, local business operators and residents prefer direct access to private property, multi-modal facilities, and frequent connections that minimize the need for out-of-direction travel.

The challenge for this IAMP is to find a balance between limiting approaches that degrade the safety and mobility of interchange operations, and maintaining access important to the local business and residential communities. In addition, it is necessary to provide access to commercial and residential properties, bicycle/pedestrian facilities, and future streetcar facilities within a very small area.

IAMP Goals

The City of Portland and ODOT have committed to work together to accomplish the following OR 43: Sellwood Bridge IAMP goals:

- Protect the function, operations, and safety of the interchange through the design life of the interchange
- Ensure safe and efficient operations of roadways connecting to the interchange

- Provide safe and effective access to land uses adjacent to OR 43 from SW Taylors Ferry Road/SW Miles Street to the Sellwood Bridge
- Pursue opportunities to manage access to OR 43 as properties between the interchange and SW Taylors Ferry Road/SW Miles Street redevelop, subdivide, or partition
- Encourage non-automobile-oriented development and multi-modal facilities, and work to reduce automobile demand along OR 43 in the IAMP study area
- Support the relevant transportation and land use policies, plans, and standards established by the City of Portland and ODOT
- Establish the framework for ODOT and City of Portland coordination related to IAMP implementation

Study Area

The Sellwood Bridge IAMP study area centers on the Sellwood Bridge and OR 43. It is bounded on the north by SW Taylors Ferry Road/SW Miles Street (about a quarter mile north of the bridge), on the south by SW Radcliffe Road (about a mile south of the bridge), on the east by the Willamette River, and on the west by the approximately 265-acre River View Cemetery as shown on Figure 3. SW Taylors Ferry Road/SW Miles Street is the first roadway intersection north of the bridge and SW Radcliffe Road is the first intersection south of the bridge. The study area is located within the larger Sellwood Bridge project area, and was selected because it is the focus for land use and access management issues that affect the current and expected future use of the interchange. The following sections of the IAMP describe land use and transportation conditions in the study area.

FIGURE 3
IAMP Study Area

SECTION 2

Existing and Expected Future Land Use in the IAMP Study Area

The Sellwood Bridge project area encompasses the roadway network that could influence interchange safety and operations. Data related to land use and transportation within the entire project area are included in the DEIS (Multnomah County et al., 2008). However, the IAMP land use and access management issues are focused on the west side of the project study area, along OR 43, shown on Figure 3. The IAMP evaluates local circulation and access management solutions within the study area. This section of the IAMP provides some general information on the entire Sellwood Bridge project area ("project area") to provide context, but provides more detail on the smaller area within which the IAMP solutions are located ("study area"). Figure 4 shows the existing development and resources in the project and study areas.

Existing Land Use

Land use on the east side of the Willamette River in the Sellwood Bridge project area is a mix of single- and multi-family residences along with small neighborhood commercial stores, smaller-scale office uses, condominium developments along the riverfront, and recreational parks and open spaces. Land use on the west side of the Willamette River in the project area is mostly parks and protected open space. This protected open space extends approximately a mile south of the bridge and includes the approximately 265-acre River View Cemetery, which forms the western boundary of the project area.

The *City of Portland Comprehensive Plan* (City of Portland, 2006a) guides future growth and development within the project area, and Title 33 of the Portland Code and Charter governs implementation of the plan through land use and zoning regulations. Figure 5 shows the comprehensive zones for the project area. These zones designate areas suitable for open space, residential, and commercial uses. Figure 6 identifies the locations of Greenway and Environmental overlay zones. These overlay zones, which are designated in areas of special value to the city, include additional land use regulations.

Of particular interest are the land uses with access to OR 43 within the IAMP study area. These land uses currently include the following:

- River View Cemetery (Tax Lots # 1S1E22 200, 1S1E22 300, 1S1E22 400, 1S1E22D 300, and 1S1E27 100) with access from a traffic signal south of the bridgehead and secondary access from SW Taylors Ferry Road.
- Staff Jennings (Tax Lots # 1S1E22DB 700 and 1S1E22DB 800), a former commercial boat dealership with a fuel dock, boathouse, boat storage, and paint shop, located between OR 43 and the Willamette River adjacent to the bridge. Staff Jennings closed in March 2010.

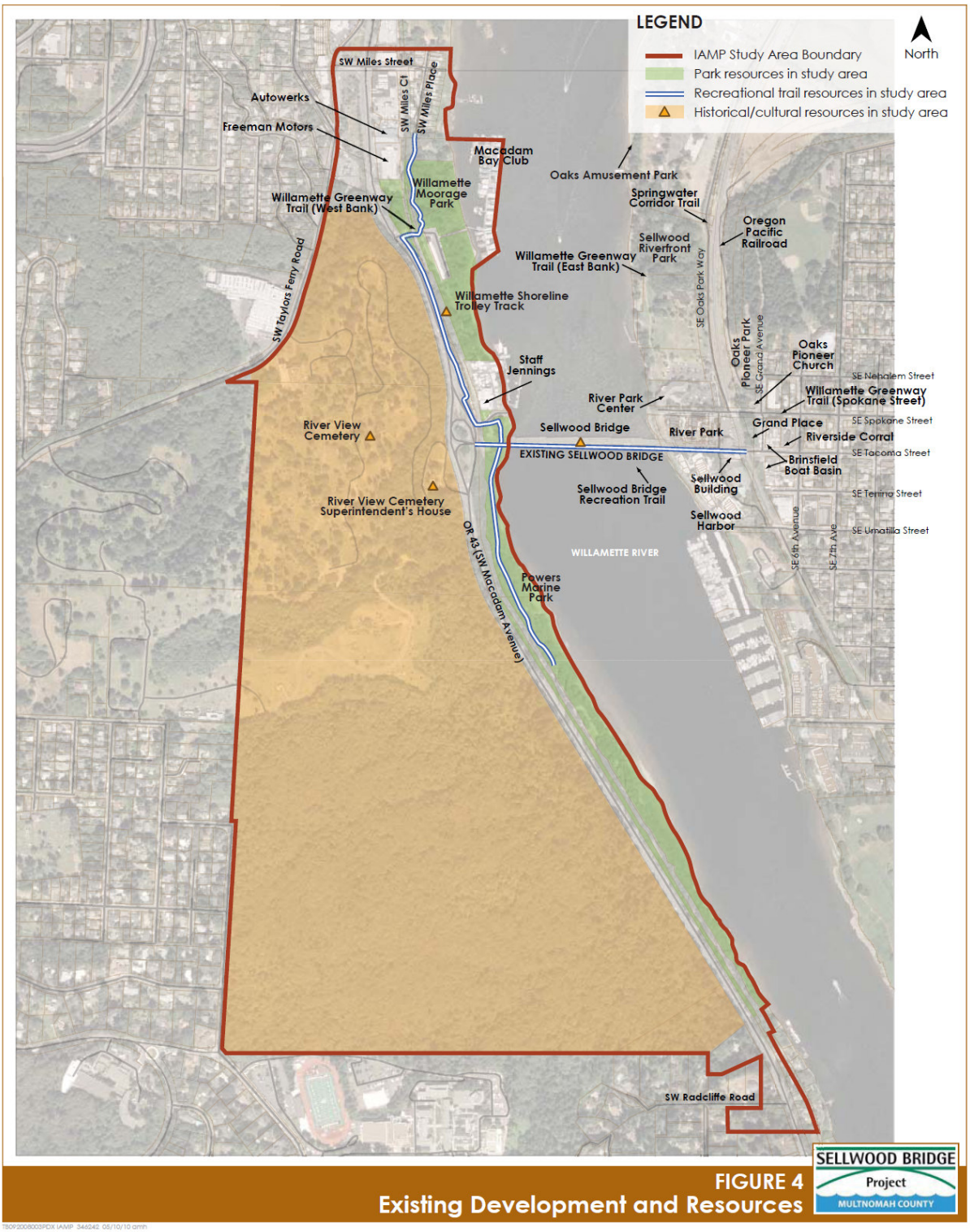


FIGURE 4
Existing Development and Resources

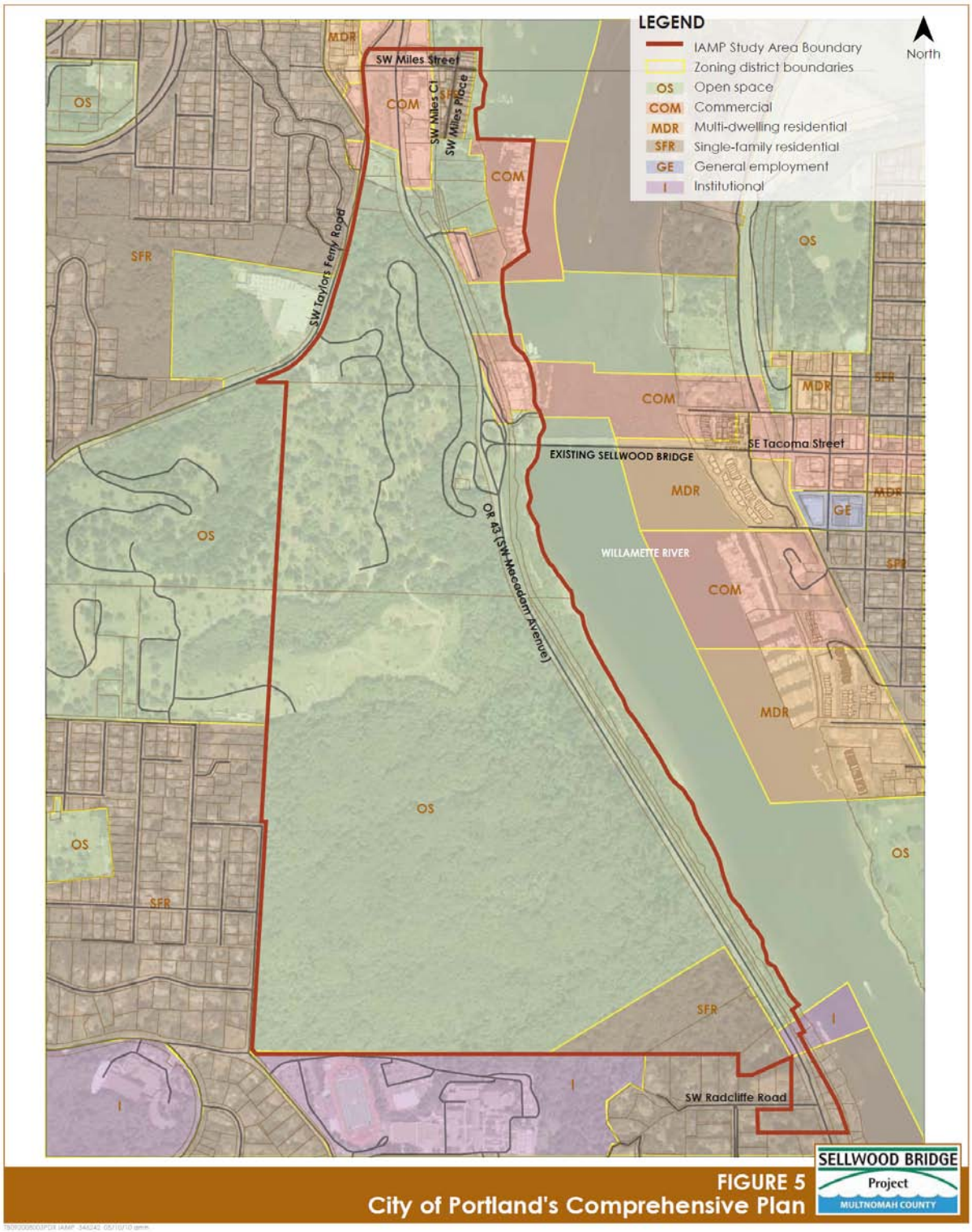


FIGURE 5
City of Portland's Comprehensive Plan

FIGURE 6
Greenway and Environmental Overlay Zones

- Powers Marine Park (Tax Lots # 1S1E22D 200, 1S1E27A 100, 1S1E27A 300, and 1S1E27A 900), a City-owned riverfront park that shares an approach with Staff Jennings, and TriMet-owned parcels adjacent to the park (Tax Lots #1S1E22AC 4700 and 1S1E22D 100).
- Macadam Bay Club (Tax Lots # 1S1E22A 1100 and 1S1E22DB 100), a floating home community with access north of the existing bridgehead from an easement through the City-owned Willamette Moorage Park (Tax Lots # 1S1E22DB 200, 1S1E22AC 5000, 1S1E22AC 4900, 1S1E22AC 4800, 1S1E22DB 500, 1S1E22DB 400, and 1S1E22DB 300).
- An approximately 3.95-acre vacant, residential-zoned parcel owned by River View Cemetery on the west side of OR 43 about a mile south of the bridge (Tax Lot # 1S1E27DA 200).
- Three privately-owned residential parcels south of the cemetery property on the west side of OR 43 near or adjacent to Radcliffe Road totaling about 3.58 acres (Tax Lot # 1S1E26CB 1400, 1S1E26CB 1501, and 1S1E26CB 1600) and a City of Portland-owned parcel in the same area (Tax Lot # 1S1E27DA 100).
- Three small, vacant, institutional-zoned parcels, totaling about 0.6 acre, owned by Lewis and Clark College on the east side of OR 43 about a mile south of the bridge (Tax Lots # 1S1E26CB 100, ES1E26CB 200, and 1S1E26CB 300). A TriMet streetcar easement separates these parcels (Tax Lot # 1S1E27A 200). These parcels are not identified for development in the college's 2008 long-range plan (Walker Macy, 2007).
- Residential parcels south of the Lewis and Clark College owned parcels east of OR 43 (Tax Lots # 1S1E26CB 500, 1S1E26CB 600, 1S126CB 700, 1S1E26CB 900, 1S1E26CB 1100, and 1S1E26CB 1300).
- Freeman Motor Company (Tax Lots # 1S1E22AC 4500 and 1S1E22AC 4600), an automobile dealership with two approaches accessing OR 43 north of the existing bridgehead near the SW Taylors Ferry Road/SW Miles Street intersection.
- Autowerks (Tax Lot # 1S1E22AC 4400), an automobile repair shop with access north of the existing bridgehead near the SW Taylors Ferry Road/SW Miles Street intersection.
- Heuker (Tax Lot # 1S1E22AC 4300), a group of small commercial uses including retail and commercial/industrial services, with two approaches accessing OR 43 north of the existing bridgehead near the SW Taylors Ferry Road/SW Miles Street intersection.
- Commercial property at the northeast quadrant of the Macadam Avenue/Miles Street intersection (Tax Lot # 1S1E22AC 3000).
- Portland General Electric-owned parcels north of River View Cemetery and south of Taylors Ferry Road (Tax Lots # 1S1E22BD 5300, 1S1E22BD 5400, and 1S1E22BD 5500).

- SW Miles Place neighborhood east of OR 43, north and south of SW Miles Street (Tax Lots # 1S1E22AC 4200, 1S1E22AC 4100, 1S1E22AC 4000, 1S1E22AC 3900, 1S1E22AC 3800, 1S1E22AC 3700, 1S1E22AC 3600, 1S1E22AC 3500, 1S1E22AC 3400, 1S1E22AC 3300, 1S1E22AC 3200, 1S1E22AC 3100, 1S1E22AC 3000, 1S1E22AC 2900, 1S1E22AC 2700, 1S1E22AC 2600, 1S1E22AC 2500, 1S1E22AC 2400, 1S1E22AC 2300, 1S1E22AC 2200, 1S1E22AC 2100, 1S1E22AC 2000, 1S1E22AC 1900, 1S1E22AC 1800, 1S1E22AC 1700, 1S1E22AC 1600, 1S1E22AC 1500, 1S1E22AC 1400, 1S1E22AC 1300, 1S1E22AC 1200, 1S1E22AC 1100, 1S1E22AC 1000, 1S1E22AC 900, 1S1E22AC 800, 1S1E22AC 700, 1S1E22AC 600, and 1S1E22AC 500).

Future Land Use

When preparing this IAMP, the City of Portland and ODOT considered the likely future land uses of the properties with direct access to OR 43 within the IAMP study area (River View Cemetery, Staff Jennings, Powers Marine Park, Macadam Bay Club, Freeman Motor Company, Autowerks, and Heuker). The City and ODOT developed a scenario for expected future land use at the end of the 20-year planning period. It was assumed that no changes in zoning would occur, but that an intensification of some of the existing uses could be anticipated. The extent of this redevelopment was projected with an understanding of the considerable constraints imposed by the Greenway and Environmental overlay zones in which all of these properties are located. Because of the zoning provisions within the IAMP study area, the indirect growth in residential and commercial uses described in the DEIS (Multnomah County et al., 2008) as a potential project impact would be expected to occur on the east side of the project area in the Sellwood community.

Specifically, the future land use scenario projected no changes in River View Cemetery, Powers Marine Park, Willamette Moorage Park, Macadam Bay Club, or Freeman Motor Company (which has been recently renovated and upgraded). The three other commercial uses (Staff Jennings, Autowerks, and Heuker) are expected to expand and moderately densify on their existing sites. The City of Portland and Metro estimated the potential future building square footage for each of these three sites based on floor area ratio estimates, setbacks (including assumed setbacks for future street car right-of-way), and parking area needs. It was assumed that future building uses would consist of 65 percent office-related uses and 35 percent retail-related uses. Appendix A describes the future land use and development scenario for the IAMP study area in more detail.

As part of the changes associated with the Sellwood Bridge Project, the existing Willamette Greenway Trail will be reconstructed through the project area. There is a separate planning process going on for a proposed Portland-Lake Oswego streetcar line. The alternatives considered by the IAMP would accommodate both of these facilities.

SECTION 3

Existing Transportation in the IAMP Study Area

Roadway Network

The Sellwood Bridge study area roadway network is shown on Figure 4. It includes the Sellwood Bridge and OR 43 between SW Taylors Ferry Road/SW Miles Street and SW Radcliffe Road. Key intersections include:

- OR 43 at SW Taylors Ferry Road/SW Miles Street
- OR 43 at River View Cemetery approach road (Sellwood Bridge)

Currently, both of these intersections are signalized.

Roadway Operations

In the vicinity of the Sellwood Bridge interchange, OR 43 has two vehicle travel lanes in each direction. Vehicles traveling northbound on OR 43 toward downtown Portland must use a one-lane bypass ramp. The southbound-loop ramp from the Sellwood Bridge to OR 43 is a single-lane one-way ramp that enables westbound bridge vehicles to enter southbound OR 43. The ramp splits off to the right from OR 43, loops under the Sellwood Bridge structure immediately adjacent to the northbound bypass ramp, and reconnects to OR 43's mainline. A traffic signal at this intersection facilitates vehicle movements. The ramp also provides access to northbound OR 43 along the mainline segment, which merges with the northbound bypass.

OR 43 services over 34,000 vehicles each weekday north of the Sellwood Bridge and 26,000 vehicles south of the bridge. During weekdays, northbound traffic volumes on OR 43 are heaviest in the morning, while the highway's southbound traffic volumes are heaviest in the afternoon. During the morning peak hour, north of the Sellwood Bridge, over 2,600 vehicles per hour travel along northbound OR 43 and 1,000 vehicles per hour travel southbound. In the afternoon peak hour, 1,900 vehicles per hour travel southbound on OR 43 and 1,200 vehicles per hour travel northbound (Multnomah County et al., 2008).

During the morning peak hour, vehicles traveling westbound along SE Tacoma Street and the Sellwood Bridge average 9 miles per hour (mph), while those traveling northbound on OR 43 average 18 mph. During the afternoon peak hour, vehicles on southbound OR 43 average 8 mph, while those traveling eastbound on the Sellwood Bridge and SE Tacoma Street average 7 mph (Multnomah County et al., 2008). These speeds reflect the current near-capacity conditions along SE Tacoma Street and at the Sellwood Bridge/OR 43 interchange.

Roadway Safety

Over the 5-year period between January 2001 and December 2005, 18 rear-end crashes were reported along OR 43 in the project area. Vehicle crash rates experienced in this area are higher than the average crash rates of comparable roadway facilities in Oregon. Most of the

reported crashes occurred in locations where substandard geometric conditions exist and during congested periods (Multnomah County et al., 2008).

ODOT has identified OR 43 within the project area as a state highway with potential safety concerns. According to ODOT's Safety Priority Index System (SPIS), OR 43 at the Sellwood Bridge interchange and north of and south of the Sellwood Bridge is in the top 10 percent of statewide SPIS sites. This ranking is based on a combination of crash frequency, severity, and rates. The extent to which crashes in the study area relate specifically to access to properties located between the interchange and SW Taylors Ferry Road/SW Miles Street cannot be accurately determined. For more information about crash history in the study area, refer to the *Sellwood Bridge Project Transportation Technical Report* (CH2M HILL et al., 2008, updated 2010).

All of the approaches to land uses along OR 43 within the IAMP study area are located less than 1,320 feet[1] from the interchange. Most of the approaches also do not meet the 350-foot spacing standard for 35-mph District Highways outside interchange areas. These approaches are key elements in the IAMP alternatives analysis, which the next section discusses.

[1] ODOT has agreed to apply 1,320 feet as the access management spacing standard at this interchange. For the area to the north of the interchange, the typical spacing standard on this type of highway would be 1 mile to the first approach.

SECTION 4

IAMP Alternatives Analysis

This section describes the process used in developing IAMP local street circulation and access management options, presents the three key options considered, provides the results of the analysis, and describes the preferred IAMP option.

IAMP Development Process

A subgroup of the Sellwood Bridge Project Management Team, comprised of representatives from Multnomah County, ODOT, City of Portland, and the CH2M HILL Sellwood Bridge project team, was designated to provide leadership to develop the IAMP. This IAMP core team conducted the following activities:

- Stakeholder interviews
- IAMP option development
- Stakeholder meetings
- IAMP option refinement
- Agency and stakeholder meetings
- A public open house
- Senior Agency Staff consultation
- Refinement of IAMP solution

Stakeholder Interviews

The IAMP core team conducted interviews with private property owners and agencies affected by access management issues in February, 2009. These interviews identified the stakeholders' concerns related to their current access to SW Macadam Avenue (OR 43) and changes that could result from the Sellwood Bridge project. Before these interviews, all of these stakeholders had been involved in the Sellwood Bridge project process and were familiar with the selection of the preferred alternative for the project as a whole.

IAMP Option Development

Based on information from the interviews, the IAMP core team developed seven access management options for the interchange and northern portion of the IAMP study area in March and April of 2009. In May 2009, staff from Multnomah County, City of Portland, Metro, TriMet, and ODOT reviewed and refined these options to:

- Improve roadway/intersection operation and safety
- Reduce impacts to parks and recreation facilities, commercial building right-of-way and access, and residential livability

Part of this work was accomplished during a 2-day design charrette with participants from all of these agencies.

No access management alternatives were considered in the portion of the IAMP study area south of the interchange because existing and expected future conditions and local land use

plans in that area are consistent with ODOT access management and other safety-related standards.

Stakeholder Meetings

In late May and early June of 2009, the IAMP core team met individually with private property owners affected by the access options. The team wanted to obtain input on access management options and generate other ideas for access improvements. Meetings were held with Macadam Bay Club residents; residents of SW Miles Place, SW Miles Street, and SW Miles Court; and the owners of River View Cemetery, Staff Jennings, Freeman Motor Company, Heuker, and Autowerks.

IAMP Option Refinement

In June 2009, based on agency and property owner input, the IAMP core team refined two of the existing options and developed a new option for consideration.

Agency and Stakeholder Meetings

In late June and early July of 2009, the IAMP core team discussed the remaining three options with ODOT, Metro, and City staff, and with the private-property-owner stakeholders.

Public Open House

In an open house held in the IAMP study area in late July 2009, interested parties reviewed the final three options and provided their input.

Senior Agency Staff Consultation

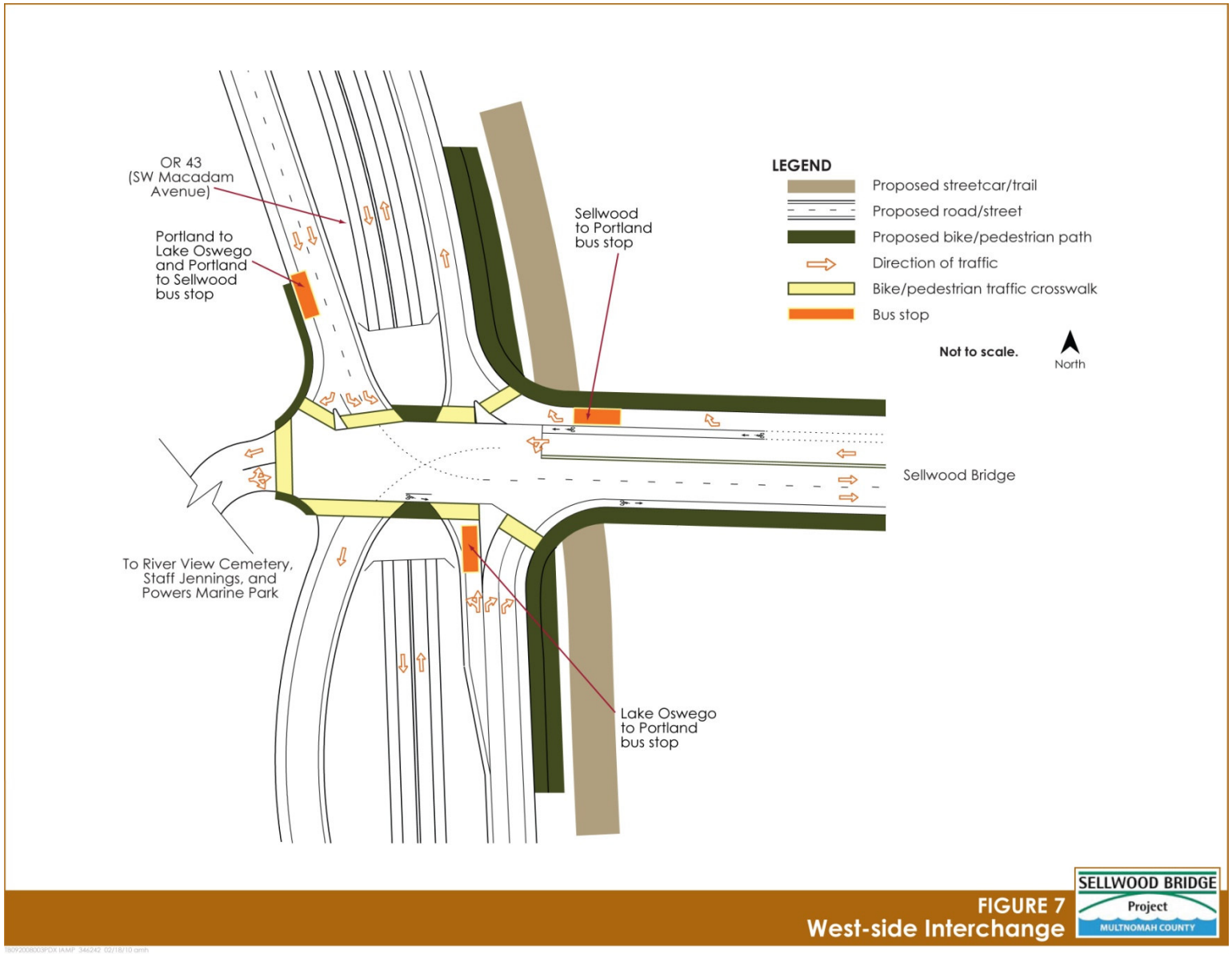
Using the information gathered during the IAMP development process, the IAMP core team presented its findings to senior staff from Multnomah County, Clackamas County, ODOT, Metro, TriMet, City of Portland, and City of Milwaukie. This Senior Agency Staff (SAS) group has actively provided advice on policy and regulatory issues throughout the Sellwood Bridge project process.

Refinement of IAMP Solution

Based on direction provided by the SAS, the IAMP core team defined the details of the IAMP solution presented in the "IAMP Option Evaluation" and "Preferred IAMP Option" sections.

IAMP Options

A combination of local circulation options and driveway modifications (which would be implemented when the interchange was built and over time) were developed to be compatible with the Sellwood Bridge project preferred alternative shown on Figure 2 and detailed on Figures 7 and 8. IAMP Options A, B, and C (the final set of three solution options developed in June 2009) are shown on Figures 9, 10, 11, 12, 13, and 14, and described in the following sections. These options, which refined other concepts prepared for discussion earlier in the process, provided the most effective resolution of issues identified by agency and private-property-owner stakeholders. No individual option satisfied the objectives of all the stakeholders.


OR 43
(SW Macadam
Avenue)
Portland to
Lake Oswego
and Portland
to Sellwood
bus stop
Sellwood
to Portland
bus stop
LEGEND
Proposed streetcar/trail
Proposed road/street
Proposed bike/pedestrian path
Direction of traffic
Bike/pedestrian traffic crosswalk
Bus stop
Not to scale.
North
Sellwood Bridge
To River View Cemetery,
Staff Jennings, and
Powers Marine Park
Lake Oswego
to Portland
bus stop
FIGURE 7
West-side Interchange
SELLWOOD BRIDGE
Project
MULTNOMAH COUNTY

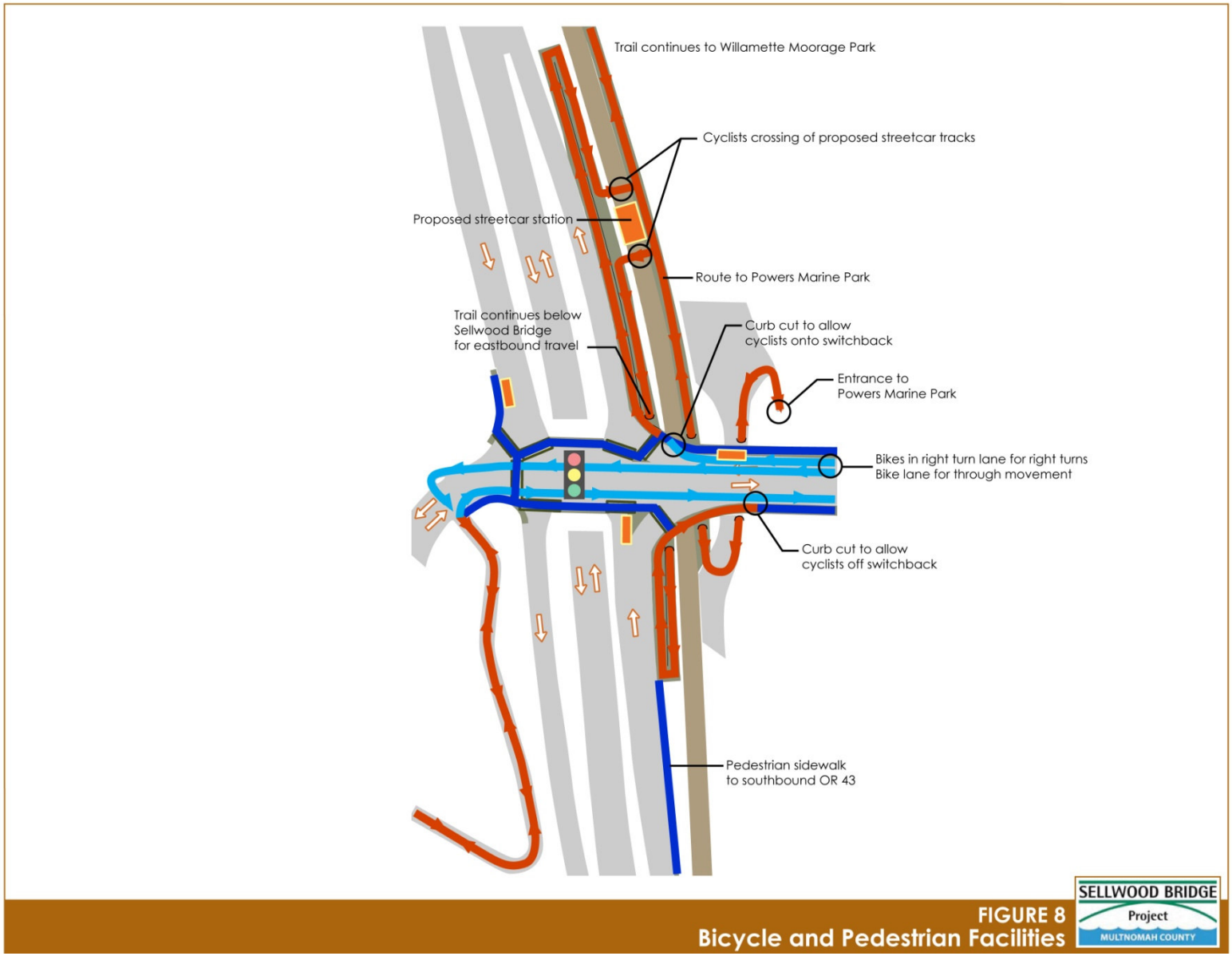
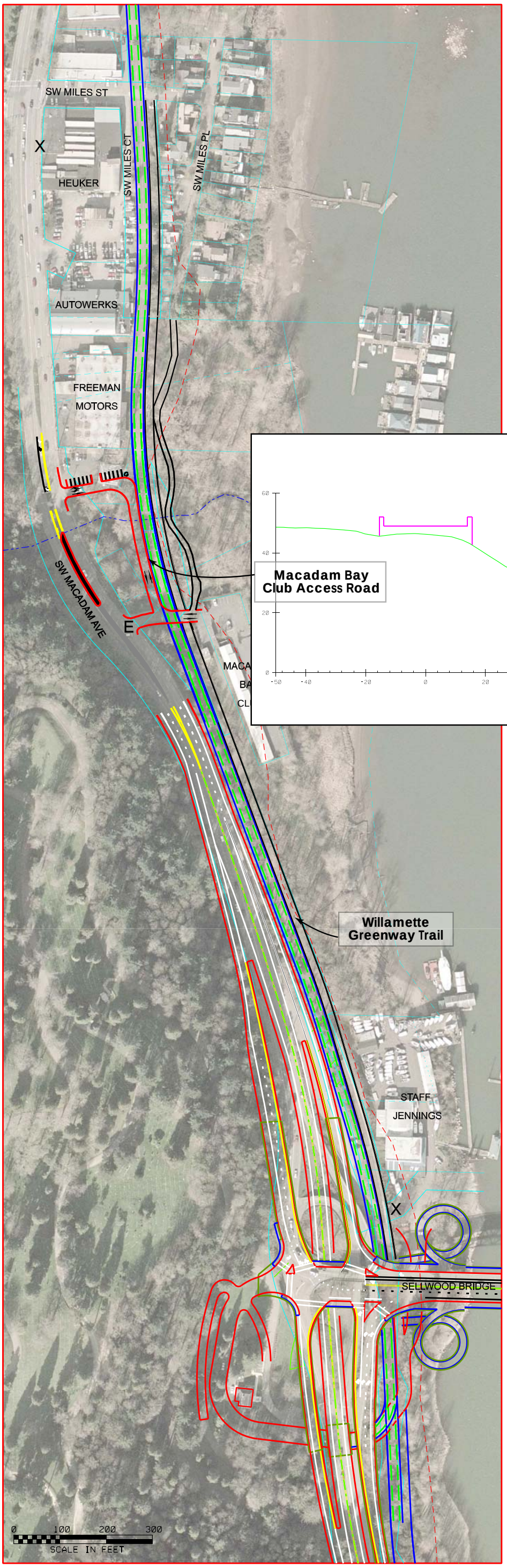


FIGURE 8
Bicycle and Pedestrian Facilities



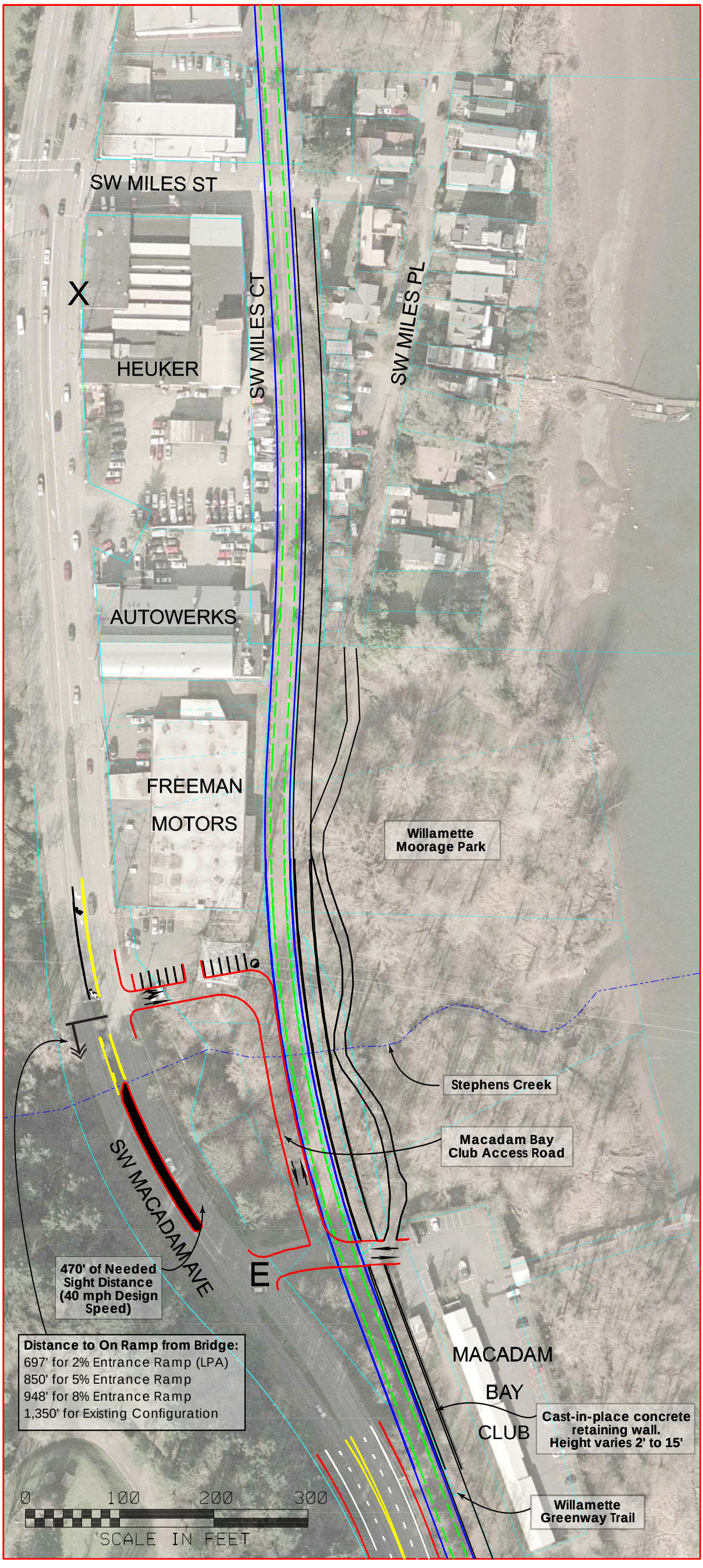
LEGEND

- X — Closed Access
- Property Line
- E — Emergency Access Only
- 26' Wide Double Track Streetcar Only

The Willamette Greenway Trail and the streetcar alignment are shown for illustrative purposes only, and their designs, alignments, and cross-sections are not adopted by the IAMP.

FIGURE 9
Option A—Overview

SELLWOOD BRIDGE Project
MULTNOMAH COUNTY



LEGEND

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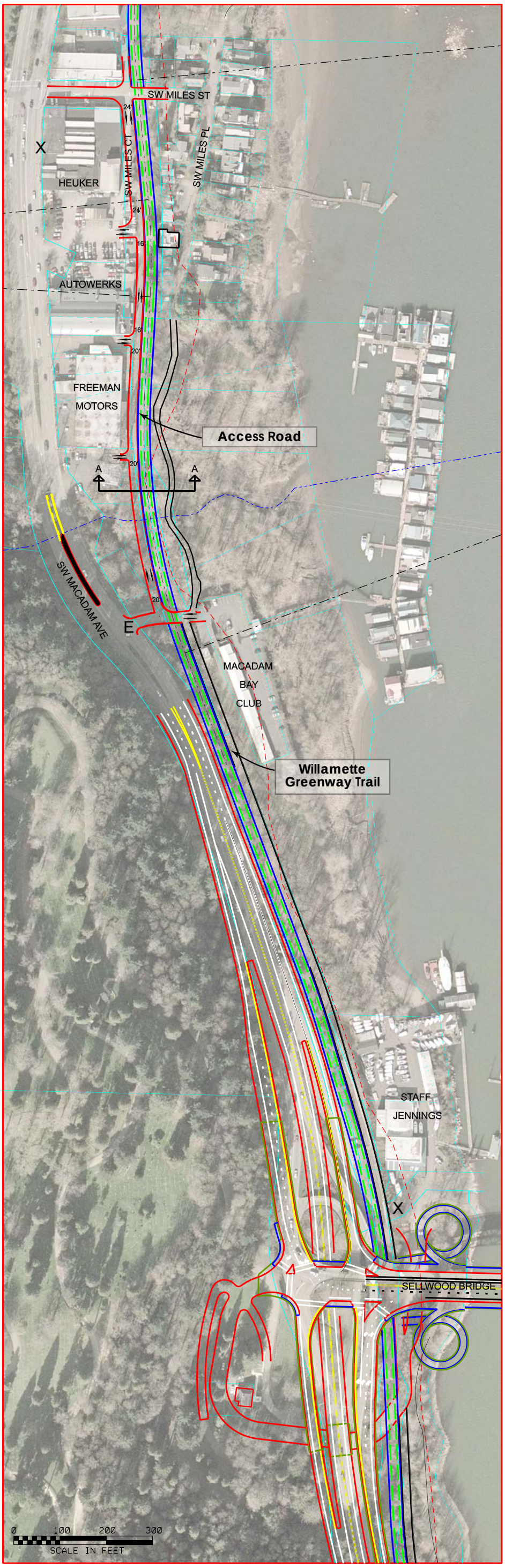
- Property Line
- E — Emergency Access Only
- 26' Wide Double Track Streetcar Only

The Willamette Greenway Trail and the streetcar alignment are shown for illustrative purposes only, and their designs, alignments, and cross-sections are not adopted by the IAMP.

FIGURE 10
Option A—Detail

SELLWOOD BRIDGE Project
MULTNOMAH COUNTY



LEGEND

- X — Closed Access
- Property Line
- E — Emergency Access Only
- 26' Wide Double Track Streetcar Only

The Willamette Greenway Trail and the streetcar alignment are shown for illustrative purposes only, and their designs, alignments, and cross-sections are not adopted by the IAMP.

FIGURE 11
Option B—Overview

SELLWOOD BRIDGE Project
MULTNOMAH COUNTY

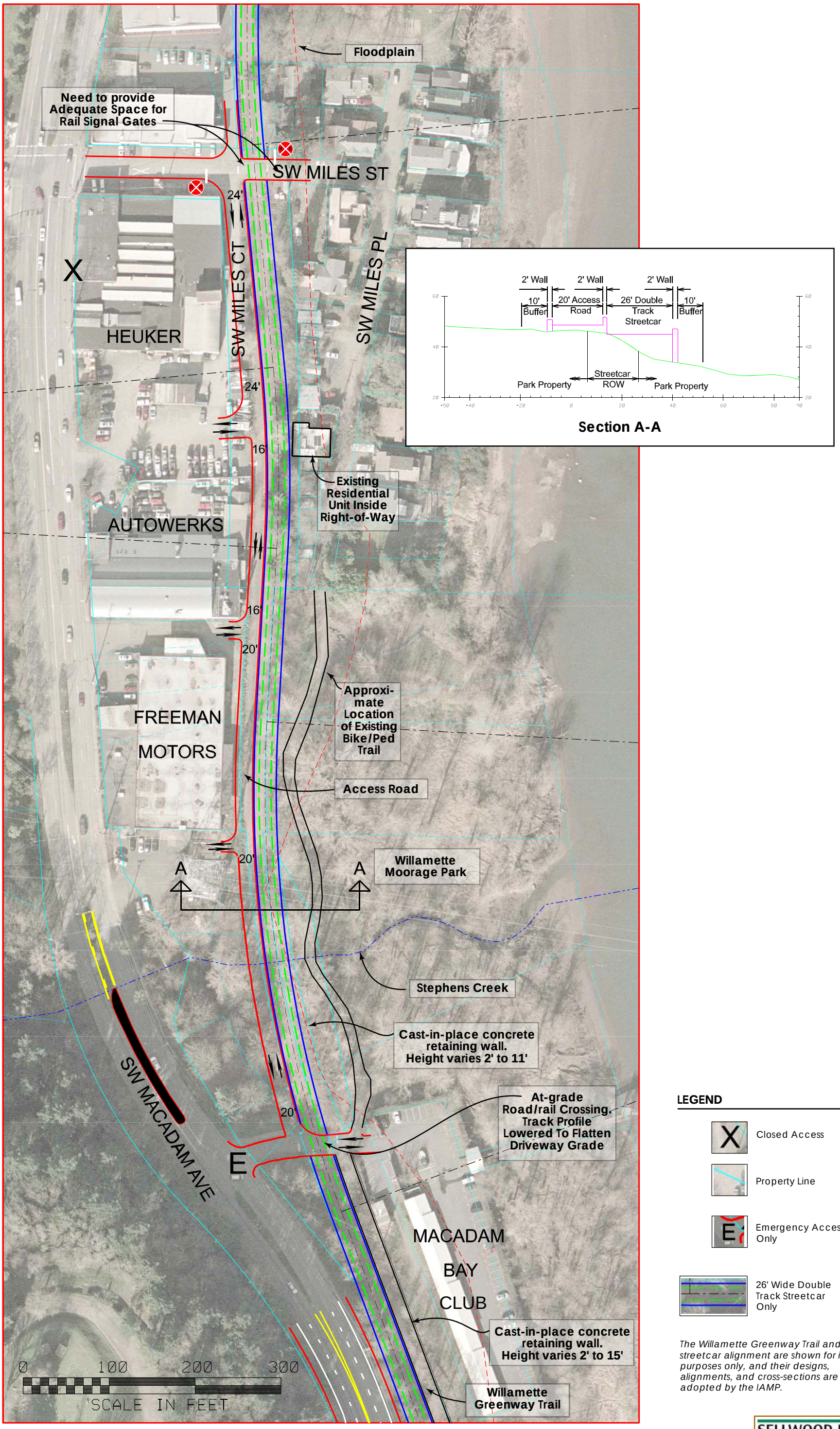
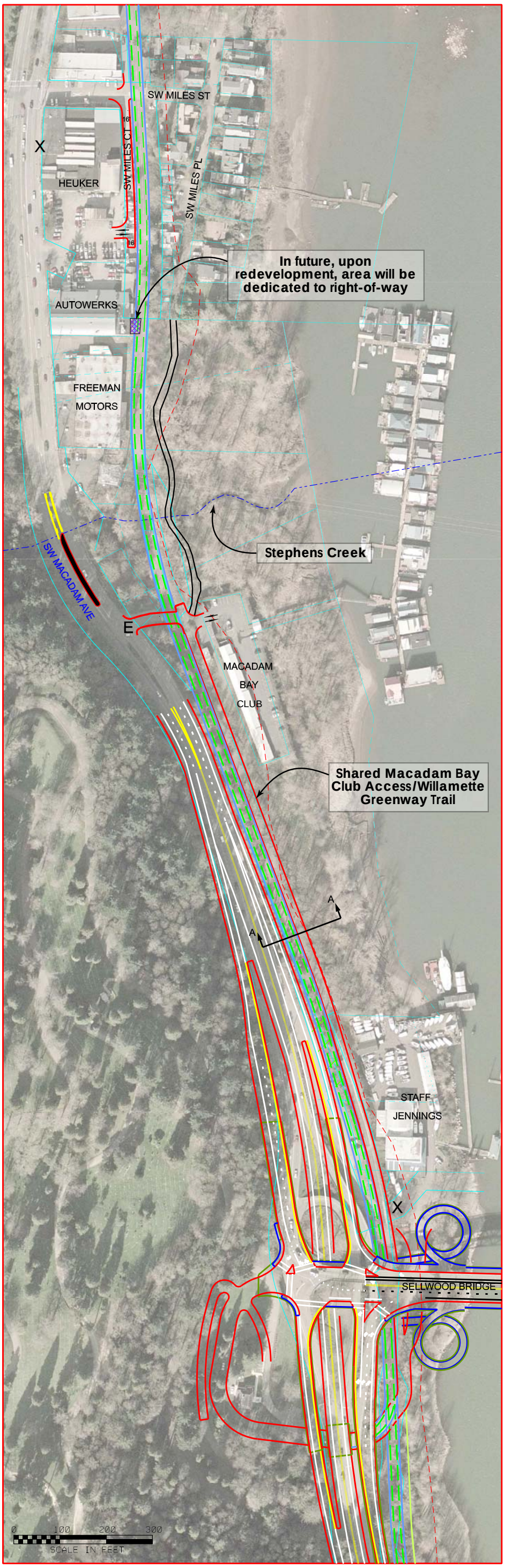


FIGURE 12
Option B—Detail

SELLWOOD BRIDGE Project
MULTNOMAH COUNTY



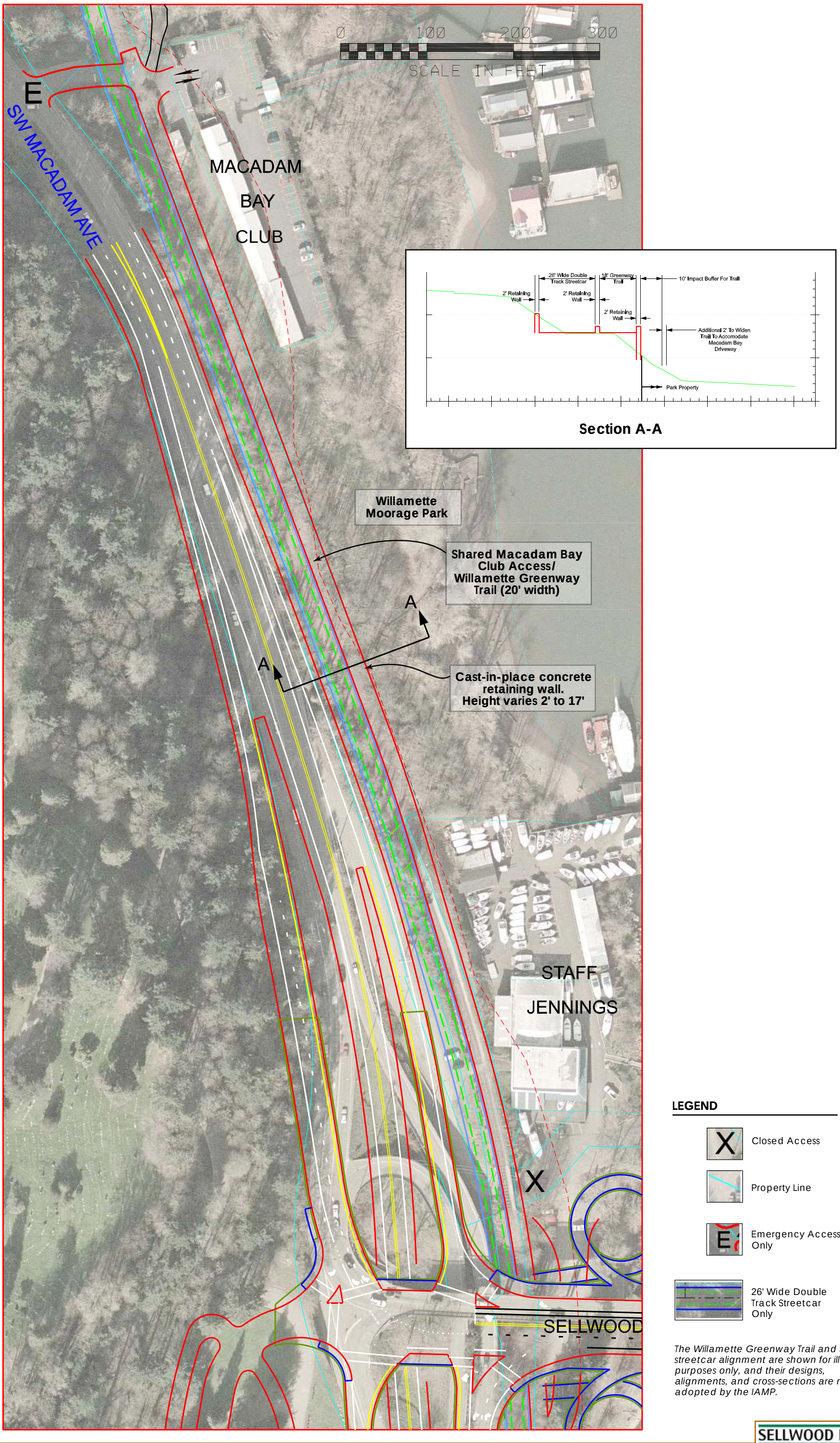
LEGEND

- X — Closed Access
- Property Line
- E — Emergency Access Only
- 26' Wide Double Track Streetcar Only

The Willamette Greenway Trail and the streetcar alignment are shown for illustrative purposes only, and their designs, alignments, and cross-sections are not adopted by the IAMP.

FIGURE 13
Option C—Overview

SELLWOOD BRIDGE Project
MULTNOMAH COUNTY



LEGEND

- X — Closed Access
- Property Line
- E — Emergency Access Only
- 26' Wide Double Track Streetcar Only

The Willamette Greenway Trail and the streetcar alignment are shown for illustrative purposes only, and their designs, alignments, and cross-sections are not adopted by the IAMP.

FIGURE 14
Option C—Detail

SELLWOOD BRIDGE Project
MULTNOMAH COUNTY

IAMP Option A

IAMP Option A would relocate the OR 43 approaches to River View Cemetery, Staff Jennings, and Powers Marine Park to the signalized intersection at the interchange (Figure 9). The Macadam Bay Club approach road would be relocated north with access to OR 43 south of Freeman Motor Company, 850 feet north of the proposed new on-ramp terminus. All direction movements would be permitted at this location. The sight distance would be 470 feet; planned tree removal in a vegetated area to the south would improve visibility (shown on Figure 10). The existing Macadam Bay Club approach road onto OR 43 could be maintained for emergency access only. Three approaches to commercial uses on OR 43 south of SW Miles Street (Freeman Motor Company, Autowerks, and Heuker) would remain open; one approach to the Heuker property would be closed (shown on Figure 10). Figures 7 and 8 show streetcar and bicycle and pedestrian facilities in the interchange area. IAMP Option A would not change existing bicycle/pedestrian facilities north of Macadam Bay Club.

IAMP Option B

IAMP Option B would also relocate the OR 43 approaches to River View Cemetery, Staff Jennings, and Powers Marine Park to the signalized intersection at the interchange (Figure 11). A new backage road (shown on Figure 12) would provide access to businesses south of SW Miles Street (Freeman Motor Company, Autowerks, and Heuker) in addition to three existing approaches from OR 43. The Macadam Bay Club approach road would be integrated into the backage road. The existing Macadam Bay Club approach road onto OR 43 could be maintained for emergency access only. Figures 7 and 8 show streetcar and bicycle and pedestrian facilities in the interchange area. With IAMP Option B, bicyclists and pedestrians would share the backage road with vehicles from Macadam Bay Club and OR 43 commercial uses.

IAMP Option C

IAMP Option C would relocate the OR 43 approach to Staff Jennings and the Macadam Bay Club to the signalized intersection at the interchange (Figure 13). The 18-foot-wide bike/pedestrian path shown on the Sellwood Bridge project preferred alternative (Figure 2) would extend from Macadam Bay Club to the end of the south interchange ramps. For IAMP Option C, this path would be widened by 2 feet from Macadam Bay Club past Staff Jennings to serve as a shared 20-foot-wide bike/pedestrian path and vehicular approach (Figures 13 and 14). The approach would connect to the roadway that passes underneath OR 43, behind the River View Cemetery Superintendent's House (funeral home), and into the interchange. The existing Macadam Bay Club approach road onto OR 43 could be maintained for emergency access only. Figures 7 and 8 show streetcar and bicycle and pedestrian facilities in the interchange area.

IAMP Option Evaluation

The IAMP core team evaluated each of the options in relation to the issues and concerns agency and private-property-owner stakeholders expressed. Table 1 compares the impacts

of the Sellwood Bridge project No Build Alternative and the three IAMP options related to the following:

- Traffic safety impacts
- Traffic operations impacts
- Residential impacts
- Business impacts
- Streetcar impacts
- Willamette Moorage Park impacts
- Water quality management
- Natural resource habitat impacts
- Bicycle/pedestrian facility impacts
- Construction cost
- Public maintenance cost
- Private-property-owner stakeholder preference issues

Appendix B presents more detailed traffic impact analysis data.

Preferred IAMP Option

Based on the evaluation summarized in Table 1, the SAS recommended IAMP Option A if ODOT and the City of Portland could agree on specific measures for short- and long-term implementation. Interagency agreements on the IAMP implementation measures for IAMP Option A are included in the "Circulation and Access Management Plan" section.

TABLE 1
OR 43: Sellwood Bridge IAMP Alternative Evaluation Matrix

Option	Traffic Safety Impacts	Traffic Operations Impacts	Residential Impacts	Business Impacts	Streetcar Impacts	Willamette Moorage Park Impacts	Water Quality Management	Natural Resource Habitat Impacts	Bicycle/ Pedestrian Facility Impacts	Construc-tion Cost (millions)	Public Maintenance Cost	Private-Property-Owner Stakeholder Preference Issues
IAMP No Build Alternative	Retains 6 driveways, including Staff Jennings' driveway 170 feet north of the northbound on-ramp High level of collisions expected to continue	SW Taylors Ferry Road/ SW Miles Street intersection at LOS F, 85.1 seconds of delay, V/C ratio = 1.20 Sellwood Bridge/OR 43 intersection operates at LOS F, 87.8 seconds of delay, V/C ratio = 1.21 Steep grade at Macadam Bay Club approach	No impacts	Business access remains status quo	No relocation of streetcar tracks north of Macadam Bay Club 2 crossings (SW Miles Street and Macadam Bay Club)	No impacts	No change throughout project area	No Stephens Creek crossing for driveway No retaining wall	No change in bike/pedestrian facilities throughout project area	0	Current Macadam Bay Club driveway (130 feet) maintenance	Current Macadam Bay Club driveway steep with poor sight distance
IAMP Option A	Relocates Staff Jennings' approach to signalized intersection at interchange and relocates Macadam Bay Club driveway 850 feet north of proposed new on-ramp Sight distance is 470 feet; ODOT considers sight distance to south Freeman Motor Company approach too short Businesses south of SW Miles Street served with 3 driveways on OR 43	SW Taylors Ferry Road/ SW Miles Street intersection at LOS F, 85.1 seconds of delay, V/C ratio = 1.20 (same as IAMP No Build Alternative) Sellwood Bridge/ OR 43 intersection operates at LOS D, 39.3 seconds of delay, V/C ratio = 0.82	Longer but flatter driveway for Macadam Bay Club residents	Closes not currently used vehicle approach at garage door on Heuker property Other business access remains status quo	No relocation of streetcar tracks north of Macadam Bay Club 3 crossings (SW Miles Street, Macadam Bay Club, and Staff Jennings)	0.29 acre resulting from Willamette Greenway Trail between Macadam Bay Club and Staff Jennings[a] 0.35 acre resulting from Macadam Bay Club approach 0.64 acre total[b]	Swales along approach road within buffer area	Stephens Creek crossing for driveway Tree removal required for adequate sight distance Retaining wall fragments habitat and restricts wildlife movement	No change in bike/pedestrian facilities north of Macadam Bay Club	$1.3	Macadam Bay Club driveway (450 feet) maintenance	Macadam Bay Club residents concerned about impacts to Stephens Creek watershed restoration area Macadam Bay Club residents requested access at traffic signal

TABLE 1
OR 43: Sellwood Bridge IAMP Alternative Evaluation Matrix

Option	Traffic Safety Impacts	Traffic Operations Impacts	Residential Impacts	Business Impacts	Streetcar Impacts	Willamette Moorage Park Impacts	Water Quality Management	Natural Resource Habitat Impacts	Bicycle/ Pedestrian Facility Impacts	Construc-tion Cost (millions)	Public Maintenance Cost	Private-Property-Owner Stakeholder Preference Issues
IAMP Option B	Relocates Staff Jennings' approach to signalized intersection at interchange and incorporates Macadam Bay Club driveway into backage road Backage road serves businesses south of SW Miles Street, along with 3 existing driveways on OR 43 Option B would result in the highest reduction of left-turning movements to/from driveways south of SW Miles Street	Added traffic to SW Taylors Ferry Road/ SW Miles Street intersection slightly worsens LOS F conditions, 87.7 seconds of delay, V/C ratio = 1.21 Sellwood Bridge/ OR 43 intersection operates at LOS D, 39.3 seconds of delay, V/C ratio = 0.82	Noise, vibration, visual, and parking impacts to residents of SW Miles Place, SW Miles Street, and SW Miles Court	Paves backage road currently in use by businesses north of Freeman Motor Company Displaces uses in right-of-way north of Freeman Motor Company (but no permanent structures)	Shifts tracks to the east north of Macadam Bay Club Could slow streetcar 3 crossings (SW Miles Street, Macadam Bay Club, and Staff Jennings) Slight increase in vehicle and bicycle traffic at the SW Miles Street/SW Miles Court intersection adjacent to the streetcar crossing	0.29 acre resulting from Willamette Greenway Trail between Macadam Bay Club and Staff Jennings[a] 0.18 acre resulting from Macadam Bay Club approach 0.35 acre resulting from shift of streetcar alignment to the east 0.82 acre total[b]	Swales along approach road	Stevens Creek crossing for driveway Retaining wall fragments habitat and restricts wildlife movement	Creates trail north of Macadam Bay Club for commuter bicyclists shared with vehicles from Macadam Bay Club and OR 43 commercial uses	$4.0	Macadam Bay Club driveway (1,100 feet) maintenance	Residents of SW Miles Place, SW Miles Street, and SW Miles Court concerned about noise, vibration and visual impacts of new driveway Residents of SW Miles Place, SW Miles Street, and SW Miles Court concerned about commercial parking and "turnarounds" on SW Miles Place and SW Miles Street OR 43 businesses concerned with loss of parking and loading facilities and other business uses in existing right-of-way Macadam Bay Club residents concerned about impacts to Stephens Creek watershed restoration area
IAMP Option C	Relocates Staff Jennings' and Macadam Bay Club's approach to signalized intersection at interchange Adds backage road for 2 properties south of SW Miles Street; both also served with OR 43 driveways Option C would result in a reduction of left-turning movements to/from driveways south of SW Miles Street	Added traffic to SW Taylors Ferry Road/ SW Miles Street intersection slightly worsens LOS F conditions, 87.7 seconds of delay, V/C ratio = 1.21 Sellwood Bridge/ OR 43 intersection slightly worsens LOS D conditions, 39.5 seconds of delay, V/C ratio = 0.82	No impacts to residents of SW Miles Place, SW Miles Street, and SW Miles Court Out-of-direction travel for Macadam Bay Club residents; slower speed because of mixed use of driveway	Closes not currently used vehicle approach at garage door on Heuker property Other business access remains Paves backage road currently in use north of Autowerks to SW Miles Street	No relocation of streetcar tracks north of Macadam Bay Club 2 crossings (SW Miles Street and Staff Jennings)	0.29 acre resulting from Willamette Greenway Trail between Macadam Bay Club and Staff Jennings[a] 0.05 acre resulting from widening Willamette Greenway Trail to accommodate Macadam Bay Club access 0.34 acre total[b]	Water quality filters (CONTECH Stormwater Solutions); swales if Staff Jennings land should become available	No Stephens Creek crossing for driveway Retaining wall fragments habitat and restricts wildlife movement, but not in the Stephens Creek area	Widens trail by 2 feet between Sellwood Bridge and Macadam Bay Club; bikes/ pedestrians share trail with vehicles from Macadam Bay Club Shared bike/ pedestrian/ vehicle use of trail increases conflict potential	$2.2[c]	Macadam Bay Club driveway (1,600 feet) maintenance	Fewest issues with Macadam Bay Club residents and OR 43 businesses Macadam Bay Club residents requested access at traffic signal OR 43 businesses requested continued access on OR 43

TABLE 1
OR 43: Sellwood Bridge IAMP Alternative Evaluation Matrix

Option	Traffic Safety Impacts	Traffic Operations Impacts	Residential Impacts	Business Impacts	Streetcar Impacts	Willamette Moorage Park Impacts	Water Quality Management	Natural Resource Habitat Impacts	Bicycle/ Pedestrian Facility Impacts	Construc-tion Cost (millions)	Public Maintenance Cost	Private-Property-Owner Stakeholder Preference Issues

[a] 0.29 acre would be converted from one park use to another park use for mitigation of the bicycle/pedestrian trail.

[b] Acreage includes 18-foot-wide Willamette Greenway Trail (West Bank), retaining walls, and buffer zone (see cross-section of Section A-A on Figure 14).

[c] This is the incremental cost of widening the Willamette Greenway Trail (West Bank) to a 20-foot width.

LOS = Level of Service; the LOS of a facility is designated with letters A through F, with A representing the best operating conditions and F the worst.

V/C ratio = volume to capacity ratio

SECTION 5

Interchange Area Management Plan

This IAMP consists of an interchange function statement, land use assumptions, and a circulation and access management plan.

Sellwood Bridge/OR 43 Interchange Function Statement

The State Classification System classifies OR 43, State Highway 3 from mileposts 2.20 to 5.79, as a District Highway. District Highways are facilities of county-wide significance that function largely as county and city arterials or collectors. They provide connections and links between small urbanized areas, rural centers, and urban hubs, and also serve local access and traffic. The management objective is to provide for safe and efficient, moderate-to-low-speed traffic flow and for pedestrian and bicycle movements. Mobility and local access objectives are balanced.

The Sellwood Bridge and SE Tacoma Street are designated as "Major Transit Streets" in Portland's *Transportation System Plan* (City of Portland, 2004, updated 2007). Portland's *Freight Master Plan* (City of Portland, 2006b) designates the bridge as a Truck Access Street in recognition of its service as an access and circulation route for the delivery of goods and services to neighborhood-serving commercial and employment land uses.

The function of the Sellwood Bridge/OR 43 interchange is to serve existing land uses on OR 43 between SW Taylors Ferry Road/SW Miles Street and SW Radcliffe Road, as well as local and regional travel markets between east and west Portland; Portland and Washington County; Clackamas County and Washington County; Clackamas County and Portland; and east and west Clackamas County. The function is not to provide for additional commercial development within the management area beyond what is allowed under current comprehensive-plan and zoning designations.

Land Use Assumptions

Land use assumptions for the IAMP were discussed in the "Existing and Expected Future Land Use in the IAMP Study Area" section and detailed in Appendix A. The IAMP provides adequate facilities and access for the existing land uses in the interchange management area, and it is consistent with the planned land uses. No changes to the *City of Portland Comprehensive Plan* (City of Portland, 2006a) or zoning designations are required for consistency with this IAMP.

ODOT is depending upon the *Comprehensive Plan* to implement the land use component of the IAMP. The City will notify ODOT of:

- Proposed changes to the *Comprehensive Plan* or zoning that would affect the IAMP study area
- Proposed changes to site circulation or existing uses of properties requiring City permits in the IAMP study area

Circulation and Access Management Plan

A majority of the members of the SAS group (which included senior staff representatives from ODOT, Multnomah County, Clackamas County, City of Portland, City of Milwaukie, Metro, and TriMet) recommended IAMP Option A as the circulation and access management plan for the Sellwood Bridge/OR 43 interchange area (see Figures 9 and 10). IAMP Option A, which will be implemented as part of new interchange construction, includes a horseshoe-shaped road that will provide access to properties in the immediate vicinity of the interchange to the signalized intersection at the interchange.

The interchange construction project will include modifications to driveways between SW Taylors Ferry Road and the interchange. The intent of these modifications will be to move in the direction of meeting ODOT access management spacing standards while providing reasonable access to existing properties and businesses. Appendix C describes anticipated driveway modifications.

Implementation Process

Short-term. After the Sellwood Bridge Final Environmental Impact Statement (FEIS) has obtained federal approval and as the project enters final design, ODOT will develop the Access Management Strategy for the interchange area consistent with this IAMP. The Access Management Strategy will consist of actions that occur within the highway right-of-way that ODOT has the authority to implement, and that will be taken during project construction. Examples of these actions include issuing permits for existing approaches, closing approaches to the highway, and installing median islands to limit turning movements.

ODOT intends to allow approaches (driveways) to adjacent property as close to IAMP Option A (see Figures 9 and 10; Appendix C) as is safe and feasible. Because the details of project designs will continue to evolve between the adoption of this IAMP and project construction, it will be necessary to evaluate the appropriateness of this access concept during the project final design phase.

ODOT will lead development of the Access Management Strategy. The process will include the following activities:

- ODOT will conduct an evaluation of the traffic operations and safety factors for anticipated driveway modifications identified in IAMP Option A/Appendix C to ensure that, in the context of project final designs, they are the most appropriate measures for meeting safety, operations, and business/residential access objectives.
- If it is determined that driveway modifications identified in IAMP Option A/ Appendix C are not appropriate measures for meeting safety, operations, and business/residential access objectives, ODOT will conduct one-on-one meetings and other communication with affected property owners to discuss property access needs and how those needs can be safely and adequately met.
- ODOT will conduct these activities in consultation with the City of Portland and Multnomah County.

The Access Management Strategy will document the locations, designs, and turning movements to be provided. The strategy will be implemented in the following manner:

- ODOT will issue access permits and establish reservations of access as needed to enact the strategy. ODOT will issue written notifications to all property owners whose access will be modified or closed as part of the project.
- Property owners whose permitted approaches are being modified or closed will have the opportunity to appeal the decision in a Region Review and/or Contested Case Hearing.[2]
- During construction, the Sellwood Bridge Project will make changes to private property approaches in accordance with the Access Management Strategy.

Medium- and long-term. After project construction in the interchange area is completed, ODOT will make access management decisions consistent with the IAMP and OAR 734-051 and issue permits. The following measures will also be implemented:

- As properties in the IAMP study area redevelop, the City will require, as legally feasible, development of an alley, easement, or tract adjacent to the eastern boundary of all properties on the east side of OR 43 Tax Lots # 1S1E22AC 4600, 1S1E22AC 4500, 1S1E22AC 4400, and 1S1E22AC 4300 (between the Freeman Motor Company and SW Miles Street). This alley, easement, or tract would be provided for supplemental or alternative access to these properties. In the event that land use or zoning changes are proposed for these properties that would require the development of such an alley, public notification of the proposed action will be provided and review procedures will be conducted as required in the Portland Zoning Code (Title 33).
- If land use changes at Tax Lots # 1S1E22A 1100 and 1S1E22DB 100 (Macadam Bay Club) that have potential for increasing trip generation to and from the site are proposed, the conditional use permit applicant will conduct a traffic impact analysis as part of a conditional use permit process. The conditional use permit applicant will need to demonstrate the safety of traffic operations related to property access, and both the City and ODOT would need to approve the application. In addition to City approval of the conditional use permit, ODOT may need to approve an access permit.
- If at any point in the future ODOT determines that there is a safety problem in the area between Tax Lots # 1S1E22AC 4500 and 1S1E22AC 4600 (the Freeman Motor Company property) and SW Taylors Ferry Road/SW Miles Street (that is, the area is identified to be in the top 10 percent of statewide SPIS sites as defined in Appendix D or by another objective method developed following consultation with the City), ODOT will analyze the cause of the safety risk and consult with the City to develop a range of solutions to reduce the safety problems. For example, solutions could include placement of a median

[2] A Region Review provides an opportunity for an applicant to present their case for review by committee members with expertise in access management policies, roadway design standards, right-of-way, and traffic engineering (including at least one professional engineer), with the ODOT Region Manager making the final decision. An applicant may also request a collaborative discussion as part of this process. A Contested Case Hearing provides an opportunity for an applicant to present their case before an Administrative Law Judge. Procedures for requesting a Region Review and/or Contested Case Hearing are found in OAR 734-051-0345 and OAR 734-051-0355.

island on OR 43 to prevent left turns to and from the subject properties. The development and evaluation of solutions will:

  - Consider the needs of and impacts to motor vehicle, transit, and bicycle/pedestrian modes
  - Be designed to avoid creation of safety or congestion problems on the local street network
  - Be proportional to the level of safety problems observed
  - Be considered in a public process commensurate to the scale of the proposed measures, including involvement of affected businesses and residents

- At any point in the future, property owners wishing to construct a new approach or modify, relocate, remove restrictions from, or change the use of an existing approach road may apply to ODOT to do so. ODOT decisions regarding these applications will be consistent with this IAMP and Division 51 and can be appealed at a Region Review and/or Contested Case Hearing in the same manner as described on the preceding page.

IAMP Compliance with Plans and Policies

Appendix E presents state, regional, and local plans and policies as they relate to OR 43: Sellwood Bridge IAMP compliance.

SECTION 6

References

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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				Year 2035 Project Conditions			
SW Macadam Ave/SW Taylors Ferry Rd–SW Miles St				***SW Macadam Ave/SW Taylors Ferry Rd–SW Miles St***			
Movement	**V/C**	**Delay (sec)**	**LOS**	**Movement**	**V/C**	**Delay (sec)**	**LOS**
EB Left-Thru	1.14	141.4	F	EB Left-Thru	1.14	141.1	F
EB Right	0.86	25.8	C	EB Right	0.86	25.9	C
WB Left-Thru-Right	0.53	38.6	D	WB Left-Thru-Right	0.53	38.6	D
NB Left	1.27	166.6	F	NB Left	1.27	166.6	F
NB Thru-Right	0.38	7.6	A	NB Thru-Right	0.38	7.6	A
SB Thru-Right	1.18	115.0	F	SB Thru-Right	1.18	115.0	F
Overall	***1.20***	***85.1***	***F***	***Overall***	***1.20***	***85.1***	***F***
SW Macadam Ave/Autowerks Property				***SW Macadam Ave/Autowerks Property***			
Movement	**V/C**	**Delay (sec)**	**LOS**	**Movement**	**V/C**	**Delay (sec)**	**LOS**
WB Left-Right	0.55	95.1	F	WB Left-Right	0.55	95.1	F
SB Left	0.07	1.4	A	SB Left	0.07	1.4	A
SW Macadam Ave/Freeman Motor Company North Approach				***SW Macadam Ave/Freeman Motor Company North Approach***			
Movement	**V/C**	**Delay (sec)**	**LOS**	**Movement**	**V/C**	**Delay (sec)**	**LOS**
WB Left-Right	0.29	167.8	F	WB Left-Right	0.29	167.8	F
SB Left	0.01	14.9	B	SB Left	0.01	14.9	B
SW Macadam Ave/Freeman Motor Company South Approach				***SW Macadam Ave/Freeman Motor Company South Approach***			
Movement	**V/C**	**Delay (sec)**	**LOS**	**Movement**	**V/C**	**Delay (sec)**	**LOS**
WB Left-Right	0.02	17.0	C	WB Left-Right	0.02	17.1	C
SB Left	0.01	14.8	B	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.

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

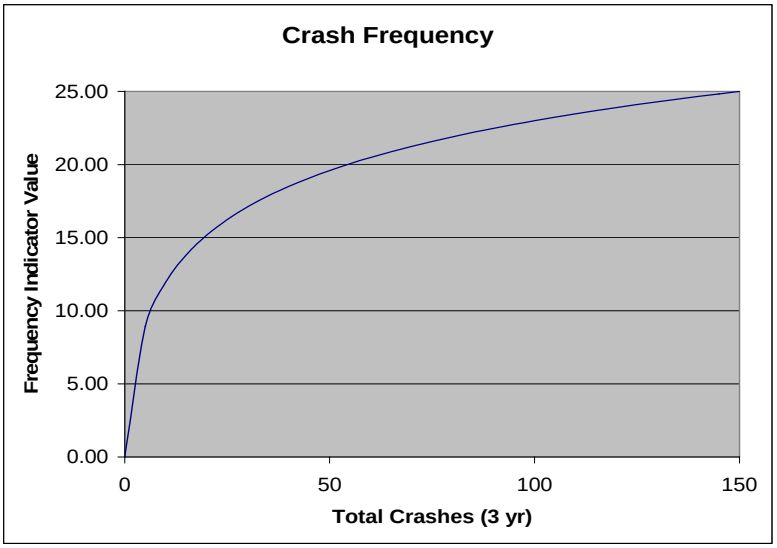

FIGURE D-1. Crash Frequency

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.

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

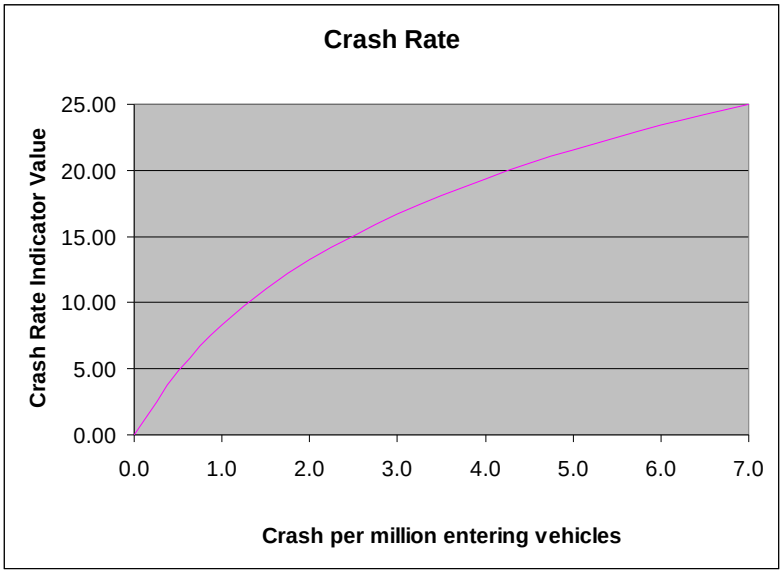

FIGURE D-2. Crash Rate

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.

Summary of Changes to Final IAMP

After the *OR-43: Sellwood Bridge Interchange Area Management Plan* was submitted for OTC review on 4/20/2010, the following changes were made:

- **Existing Land Use** (p. 7-12): This section was edited to correct errors in the descriptions of the Staff Jennings property and the Heuker property, and to add tax lot information for parcels in the SW Miles Place neighborhood that had been accidentally omitted. Figure 5 (p. 9) was retitled to indicate that it shows City of Portland Comprehensive Plan designations, not existing zoning.
- **Future Land Use** (p. 12): This section was edited to change the phrase "zoning restrictions" to "zoning provisions," and to incorporate the Willamette Greenway Trail and the proposed Portland-Lake Oswego streetcar line.
- **IAMP Alternatives Analysis:**
    - Notes were added to Figures 9-14 (p. 19-30) to clarify that the IAMP does not adopt the designs, cross-sections, or alignments of the Willamette Greenway Trail or streetcar line. The descriptions
    - Figure 10 (p. 21) was corrected to show the Willamette Greenway Trail ending at SW Miles Street (rather than crossing it and continuing to the north).
    - The descriptions of Options B and C have been edited to maintain the existing Macadam Bay approach road for emergency access.
    - The entry for IAMP Option B in Table 1: OR 43: Sellwood Bridge IAMP Alternative Evaluation Matrix (p. 34) has been edited to include the slight increase in vehicle and bicycle traffic at the SW Miles Street/SW Miles Court intersection adjacent to the streetcar crossing
- **Implementation Process: Medium- and Long-Term** (p. 39-40): This section was edited to add the following sentence:
    - "In the event that land use or zoning changes are proposed for these properties that would require the development of such an alley, public notification of the proposed action will be provided and review procedures will be conducted as required in the Portland Zoning Code (Title 33)."
- **Appendix C: Anticipated Driveway Modifications** (p. C-1): This section was edited to clarify that the Sellwood Bridge Project, with cooperation of the City of Portland, will be responsible for tree clearing.
- **Appendix E: Findings:**
    - OTP Policy 2.2 (E-7) was edited to reflect that an alley, tract, or easement will be required if justified by redevelopment, change in land use, or change in safety conditions.
    - OHP Policy 5.1 (E-8) was edited to begin "if commercial properties in the area redevelop," rather than "as commercial properties in the area redevelop."
    - Local Transportation, Land Use, and Neighborhood Plans (E-14) was edited to add the Macadam Plan District to the list of plans that had been reviewed and would not be negatively impacted by the IAMP.
- The entire document was updated to correctly distinguish between SW Miles Street, SW Miles Court, and SW Miles Place.

Sellwood Bridge Interchange Area Management Plan:

Summary of Comment Received on the 3/29/2010 Public Review Draft and ODOT Responses

Prepared 5/10/2010

This matrix presents a summary of comments received on the public review draft of the Sellwood Bridge IAMP, along with ODOT responses. Stakeholder letters of comment are attached and unedited as part of this record. Where an individual stakeholder has raised a similar issue in multiple comments, the matrix includes one representative comment with ODOT's response. Responses also describe anticipated actions to be taken by ODOT, the City of Portland, and the Sellwood Bridge Project (Project) to respond to the issues raised by stakeholders.

Comment	Source(s)	Date	Response
The City of Portland requests that Appendix C: Anticipated Driveway Modifications be edited to clarify that the Sellwood Bridge Project will clear trees with the cooperation of the City of Portland.	City of Portland	4/29/2010	This change has been made.
The City of Portland requests that the Future Land Use section refers to "zoning provisions" rather than "zoning restrictions."	City of Portland	4/29/2010	This change has been made.
The City of Portland suggests the following language be added to the "medium and long-term implementation" section of the IAMP: "In the event land use or zoning changes are proposed for these properties that requires the development of such an alley then public notification of the proposed action will be provided and review procedures will be conducted as required in the Portland Zoning Code (Title 33)."	City of Portland	4/29/2010	This language has been added.

"Figure 9: Option A Overview and Figure 10: Option A Detail both show a new Willamette Greenway Trail running parallel to the streetcar R.O.W. However, Figure 9 shows it ending at SW Miles Street, while Figure 10 shows it extending north, running through my yard, and cutting off access from my property to the street."	Dowd, Mike	4/1/2010	Figure 9 is correct. Figure 10 has been corrected to show the trail stopping at SW Miles Street. The Greenway Trail is shown for illustrative purposes only, and its design and cross-section are not adopted by this IAMP. The Project will be responsible for finalizing Greenway Trail designs.
"The streetcar and pedestrian path […] are really shown for reference only, since they are a separate project outside the IAMP. Whatever form they ultimately take will be determined in that project's own design process."	Dowd, Mike	4/3/2010	This commenter is correct that the streetcar and bicycle/pedestrian path are being addressed in design processed outside of the IAMP. The Willamette Green Trail will be redesigned and replaced as part of the Sellwood Bridge Project. The potential future Portland-Lake Oswego Streetcar is currently under development in its own Draft EIS, and the NEPA process requires consistency between the two projects. The two project teams have been coordinating during development of both projects and will continue to do so. A note has been added to Figures 9-14 to clarify that the IAMP does not adopt the streetcar and path designs or alignments.
"Options B and C are also shown, but Option A is the one that was preferred by the SAS group. But that isn't an ultimate, final approval of Option A, as the IAMP states, and not a guarantee that Option A is what will ultimately be constructed."	Dowd, Mike	4/3/2010	There is a commitment in the IAMP to the Option A concept. The reason that the IAMP does not commit to providing Option A exactly as shown is that IAMPs are written as policy level documents and do not adopt decisions on private property approaches. During Project final designs, there will be an evaluation of traffic operations and safety factors under Option A -- this is a standard part of development of an access management strategy, as relatively small changes in the Project and approach designs can significantly affect safety and operations. As the IAMP states, the Project would provide as close to Option A as is safe and feasible.

Commenter notes that in discussing the commercial properties in the IAMP study area, the IAMP omits the businesses on the north side of SW Miles Street and also omits discussion of possible impacts to these businesses.	Dowd, Mike	4/30/2010	The northern end of the study area boundary had been set as SW Miles Street, as approaches to OR-43 located between the Sellwood Bridge interchange and the first full-movement intersection are those with the most critical impacts on interchange safety and operations. The actions constructed by the Sellwood Bridge project under IAMP Option A are not expected to have negative impacts to the businesses on the north side of SW Miles Street. If there are future changes proposed to the SW Miles Street area (including potential construction of an alley, tract, or easement), impacts to these businesses will be considered and they will be engaged in any public involvement processes.
Commenter suggests it is inaccurate to refer to the uses on the Heuker property as "'a group of small retail shops' rather than as having significant amounts of industrial service and other non-retail uses (general contractor, painting contractor, hoop manufacturer, etc.)."	Dowd, Mike	4/30/2010	The text has been changed to describe the Heuker property as "a group of small uses including retail and commercial/industrial services."
Commenter questions the future traffic projections associated with the commercial parcels on SW Macadam, as the IAMP "state[s] that current non-retail uses--such as those same substantial amounts of the Heuker property, and ALL of Autowerks—are assumed to remain over time, in order to make the future use assumptions seem reasonable. But then, in those same assumptions, [the future uses] entirely replace[s] those uses with office and retail uses, which have much higher trip generation numbers."	Dowd, Mike	4/30/2010	To determine whether proposed transportation improvements will be adequate to support future land uses over a long-range planning horizon (in this case 20 years), plans typically include traffic generation estimates based upon a reasonable worst-case scenario. This is based on assumptions about future development that take into account local land use plans; zoning restrictions on type, size, and density of development; as well as market factors and other considerations that may influence development in the area. In the case of the commercial parcels on SW Macadam, the estimates were developed through collaboration between ODOT and the City of Portland. ODOT recognizes that the property owners and businesses on SW Macadam have expressed no intention of selling, moving, or substantially changing the use of these properties in the foreseeable future.

Commenter notes that Miles Street, Miles Place and Miles Court are used "interchangeably throughout the IAMP, even though they are three distinct streets."	Dowd, Mike	4/30/2010	The IAMP has been edited to correct the use of these street names where errors were made.
Commenter notes the IAMP maps do not include "the City's new pump station in the R.O.W. at that same corner, [which would conflict] with the trail as shown in Option B, and would have dramatically increased the cost of that option to deal with that."	Dowd, Mike	4/30/2010	The map element the commenter refers to is not a trail, but a driveway meant to preserve existing access to the properties on the north side of SW Miles. Option B was not expected to impact the pump station, as it preserves the current driveway in that location.
Commenter notes that the IAMP sections on Existing Land Use and Future Land Use "leave out all mention of the proposed streetcar line connecting Lake Oswego to Portland—even though that is the single most significant future use in the area--and the associated bike/pedestrian trail."	Dowd, Mike	4/30/2010	The Future Land Use section has been changed to incorporate the Portland-Lake Oswego streetcar line and Willamette Greenway Trail.
Commenter criticizes the IAMP future traffic generation projections for the commercial parcels on SW Macadam, for not taking into account vehicle trip reductions associated with the proximity of these sites to a future streetcar line and bicycle/pedestrian trail.	Dowd, Mike	4/30/2010	Should future redevelopment occur at those sites, availability of non-auto travel options is typically considered when assessing possible traffic impacts and identifying any appropriate mitigation measures.

Commenter criticizes the IAMP for failing to acknowledge potential safety conflicts associated with redirecting vehicle access onto SW Miles Court behind the commercial properties on OR-43/SW Macadam, in close proximity to the bicycle/pedestrian trail and the streetcar crossing.	Dowd, Mike	4/30/2010	The matrix entries for Option B have been updated to include the slight increase in vehicle traffic (mixed with bicycle and pedestrian traffic) near the streetcar crossing on SW Miles Street. However, very few peak hour vehicle trips are expected to use the approach road along SW Miles Court. Options A and C do not provide additional parcels with approaches to SW Miles Court, and do not include Project-constructed closure of approaches from the commercial parcels to OR-43 (except one approach that is not currently in use). Therefore, Options A and C are not expected to redirect vehicle trips to the intersection of SW Miles Court and SW Miles Street. Should future access changes be identified as needed for these properties, the multimodal traffic impacts will be analyzed at that time.
Commenter criticizes the omission of the boundaries of the Macadam Plan District from the Existing Land Use map and the text of the IAMP.	Dowd, Mike	4/30/2010	The findings in the IAMP have been updated to address the Macadam Plan District. The IAMP is consistent with the plan district's regulations. The development restrictions set by the District were taken into account in the projections of likely future land uses.
Commenter makes various assertions regarding the IAMP's inconsistency with state and local laws, regulations, guidance, and codes.	Dowd, Mike	4/30/2010	ODOT does not agree with the interpretation of these laws, regulations, guidance, and codes that the commenter relies on in his other comments. The commenter's unedited letters have been made available for review as part of this record of comment.
Commenter asserts that redirecting vehicle approaches to the rear of the commercial sites along SW Macadam will conflict with various City Code requirements regarding building orientation and site design.	Dowd, Mike	4/30/2010	Should a property owner submit a permit application for redevelopment or a change of use that would require construction of an alley, tract, or easement to mitigate traffic impacts, the City of Portland will assist the property owner in balancing the various City Code requirements.

"The IAMP states, “The IAMP core team conducted interviews with private property owners and agencies affected by access management issues in February, 2009”. The core team then developed access options in March and April. In May, project staff refined these options. But it was not until nearly June that I and other Miles Street residents were notified of the plan (and even then, not directly), and even at that meeting we were not allowed to see the schemes that had been available since March. [...] Even after some property owners had had months of private meetings with the project team, residential neighbors still didn’t get even a postcard!"	Dowd, Mike	4/30/2010	The public involvement process occurred in phases, beginning with interviews to gather information from stakeholders whose property access could be directly affected by the IAMP. ODOT, the Sellwood Bridge Project, and the City of Portland then spent several months developing and refining IAMP options. Once the agencies had jointly developed a set of access options that were technically feasible, minimized environmental impacts, and addressed agency needs, the IAMP core team contacted the residents of the SW Miles neighborhood and other stakeholders in the IAMP study area to gather input on these options. ODOT attempted to contact all property owners in the IAMP study area (based on property records) and apologizes if any property owners or residents did not receive IAMP information.
"My third concern is that the information in the IAMP, as well as what has been shown to the public, has not made those provisions [regarding potential dedication of an alley, tract, or easement behind the businesses along SW Macadam, and potential restrictions to the OR-43 approaches from those businesses] clear or evident. Specifically, they have never appeared on any drawing of the project, or in descriptions of anticipated driveway modifications, either in the IAMP, or in any previous project materials or presentations."	Dowd, Mike	4/30/2010	During the public involvement efforts for the IAMP, ODOT gathered input from property owners on all aspects of IAMP Options A, B, and C, including the possibility of an alley, tract, or easement behind the SW Macadam commercial parcels. The IAMP core team and SAS considered public input when making the decision to select Option A as the preferred alternative, with the potential for requiring an alley, tract, or easement if warranted by future conditions.

Commenter criticizes Figure 2: Preferred Alternative, due to its inclusion of portions of the IAMP study area "far below the Miles Street/Place neighborhood, to give the impression that there will be no impacts in it," and also criticizes this figure for omitting "any mention or indication of driveway closures on Macadam, or redirection of traffic onto Miles Street."	Dowd, Mike	4/30/2010	The visual extent of Figure 2 was set to show the roadway changes expected to be constructed by the Sellwood Bridge Project. It does not include all portions of the study area. The IAMP does not identify any driveways that the Project will close as part of Option A, other than the northernmost unused driveway to the Heuker property, or any other measures for the Project to take to redirect traffic onto SW Miles. Should future redevelopment conditions warrant changes to property access, the City of Portland will involve the public through its notification and review procedures. Should future safety condition warrant changes to property access, ODOT will provide a public process.
Commenter criticizes the IAMP for "show[ing] a proposal for redirecting traffic onto Miles Street—the creation of a new street--on another option (B) but stat[ing] that this option is not designated to be carried forward, to give the impression that the redirection of the traffic onto Miles Street has been dropped from consideration.	Dowd, Mike	4/30/2010	Option B was not identified as the preferred alternative. As described above, should future redevelopment or safety conditions warrant changes to property access near SW Macadam and SW Miles, the City of Portland and/or ODOT will provide a public process as changes are being considered.
Dowd, Mike notes possible confusion regarding "some red lines that could be interpreted as traffic redirection on the third scheme (Option C)," which are not included in the figure legend.	Dowd, Mike	4/30/2010	The solid red lines on Figures 9-14 outline roadway changes to be constructed under those options, not traffic redirection.
Commenter criticizes the IAMP for "in all options, show[ing] the Macadam driveways as being kept active, then bury[ing] ODOT's interest in removing them in the text at the end of the report"	Dowd, Mike	4/30/2010	As described above, none of the IAMP options identify driveways that the Project will close other than the northernmost unused approach to the Heuker property. Should future redevelopment or safety conditions warrant changes to property access near SW Macadam and SW Miles, the City of Portland and/or ODOT will provide a public process as changes are being considered.

Commenter criticizes the IAMP for not addressing impacts or costs associated with potential future development of an alley, tract, or easement behind the commercial parcels on SW Macadam.	Dowd, Mike	4/30/2010	Potential future development of an alley, tract, or easement is not a change to be made by the Project under Option A, so any impacts resulting from it are not included in the matrix. Should future redevelopment or safety conditions warrant changes to property access near SW Macadam and SW Miles, impacts of possible changes will be assessed at that time.
Commenter asserts that "that the required alley/easement directing traffic from the commercial properties onto Miles Street is illegal for Autowerks to use, as mentioned already, and may not even be legal for Freeman Motors to use, since it's businesses includes a prohibited use (vehicle repair) as an accessory use."	Dowd, Mike	4/30/2010	This is a misinterpretation of City Code regarding what land uses are permitted in the Macadam Plan District. Autowerks is an existing use in this location. City Code restricts the addition of new vehicle repair land uses in the Macadam Plan District, but does not require the removal of existing uses. If changes are made to the roads near Autowerks, the inclusion of vehicle repair as part of this business will not in any way limit whether that business can legally be served by those roads.
"I am requesting in it that the IAMP's provisions for redirecting traffic onto Miles Street [through potential future development of an easement, tract, or alley] be made an option, rather than a requirement, that would be considered in a public process in which all relevant impacts would be considered."	Dowd, Mike	4/30/2010	There is no guarantee that conditions will ever warrant the construction of an alley, tract or easement behind the commercial parcels on SW Macadam or other changes redirecting their access to SW Miles. Even with a change in safety conditions or redevelopment of these parcels, there is no guarantee that an alley, tract, easement, or OR-43 driveway closures would be the appropriate mitigation measure. If development, land use, or safety changes significantly enough to warrant changes to property access, there will be a public process which will consider the impacts of possible changes to nearby stakeholders.
"The 1100'-long street in Option B would violate Fire Code regulations that limit dead ends to 300'."	Dowd, Mike	4/30/2010	The description of Options B and C has been changed to reflect that, like Option A, they would maintain the existing Macadam Bay approach for emergency access.

Commenter notes that in discussing the residential properties in the IAMP study area, the IAMP omits "ALL 14 houses on Miles Place on the water, and ALL 4 additional houses on the north side of Miles Street, for a total of 18 out of 25 omitted."	Dowd, Mike	4/30/2010	The Existing Land Use section has been updated to incorporate the missing tax lot IDs.
Commenter states that it is an error to show on the "zoning map that the part of the neighborhood closest to the new route is zoned for commercial--not residential."	Dowd, Mike	4/30/2010	Figure 5 had been inaccurately labeled as "Existing Zoning." It is a map of the City of Portland Comprehensive Plan designations for land within the study area. The name of Figure 5 has been corrected.
The Macadam Bay HOA expresses concerns regarding the enviromental impacts of the proposed Madacam Bay approach road to the recently restored Steven's Creek watershed, the Willamette Moorage Natural Area, the South Portland Riverbank Area, and the mature trees, including firs and cedars, that will be cut down to construct the road.	Fairbanks, Jean	4/8/2010	The restored sections of the Steven's Creek watershed are located just east of the sections impacted by the proposed approach road and are not expected to be altered by it. The Sellwood Bridge Project has been coordinating with Portland Parks and Recreation (PPR), the Portland Bureau of Environmental Services (BES), the Oregon Department of Fish and Wildlife (ODFW), and the Portland Bureau of Development Services (BDS) to develop plans to replace the existing culverts where they will be impacted by the project with designs that will improve opportunities for fish passage. The Project will work with Portland Parks and Recreation to mitigate any loss of tree canopy due to project construction. There will be water quality treatment included to manage run-off from the new approach road. Other environmental impacts, if identified, will be addressed by the Sellwood Bridge Project.

"The problem of entrance to Macadam Bay could be solved be putting an “on demand” stop light on Macadam Avenue."	Fairbanks, Jean	4/8/2010	The Macadam Bay HOA first made this request to ODOT in a letter on 5/12/2009. As ODOT explained at stakeholder meetings in summer 2009 and in a letter sent on 8/24/2009, the installation of an on-demand stoplight at the current Macadam Bay approach to OR-43 is not considered to be a safe option. Adding a signal at that location would replicate the conditions found at the locations on Oregon's highway system with the highest crash rates. These conditions include a short distance between the ramp taper and the location of the existing approach, roadway curvature affecting sight distance, and the higher likelihood that highway motorists will run the red light at a signal that is rarely red.
"We [the Macadam Bay Homeowners Association] feel, and we have expressed ourselves at every opportunity, that the proposed entrance to our homes has SERIOUS SAFETY ISSUES. Asking us to enter/exit from Macadam Avenue, on a curve, with no light, and reconstruction of a large interchange on Macadam, is DANGEROUS !"	Fairbanks, Jean	4/8/2010	ODOT recognizes that the Macadam Bay HOA has expressed concerns about the safety of Option A. When the Project reaches final design, ODOT will conduct an evaluation of the traffic operations and safety factors for anticipated driveway modifications identified in IAMP Option A to ensure that they are the most appropriate measures for meeting safety, operations, and business/residential access objectives. If it is determined that Option A does not safety, operations, and business/residential access objectives, ODOT, the City of Portland, and the Sellwood Bridge project will engage stakeholders in a public process to determine how these objectives can be safely and adequately met.
"The proposed new entrance [approach road to Macadam Bay] demands two additional sharp turns, making it more difficult to enter."	Fairbanks, Jean	4/8/2010	The turns are wide enough to accommodate passenger vehicles, passenger vehicles towing trailers, and large vehicles such as garbage trucks. The new approach road will also have significantly less challenging grades when compared to the current access.

"The proposed new entrance would have to be wide enough to allow for commercial trucks, fire trucks, etc. The current entrance is only 20’ wide at the trolley tracks, which would demand significant re-construction of the current entrance."	Fairbanks, Jean	4/8/2010	Turnaround opportunities under Option A will be equivalent to existing conditions. ODOT and the Project will also consider turnaround opportunities during final design.
"The proposed entrance would be less direct, and could have a negative effect on our continued security problems."	Fairbanks, Jean	4/8/2010	The Macadam Bay HOA has not previously informed ODOT of any security problems occurring at their entrance. ODOT encourages the Macadam Bay HOA to provide this information to both ODOT and the Project, so that it can be considered during the development of final designs.
"There is simply not enough space to build [the approach road to Macadam Bay shown in Option A] (that will fit garbage and fire trucks)."	Fairbanks, Jean	4/16/2010	The existing Macadam Bay driveway will be preserved for emergency access. The technical staff working on the IAMP have reviewed the design with garbage truck turning templates to ensure their ability to access the site using the new approach road.
"One section leaves open to optionally use that easement that would run through our building if Autowerks were to lose that portion of its property contemplated for an easement by means of dedication or condemnation, it will effectively cause Autowerks to close down its business."	Lawrence, Denise	4/30/2010	It is unlikely the construction of an alley, tract, or easement would be required without significant changes to the development, land use, or traffic safety conditions at these parcels. The owner of the Autowerks property would not be required to dedicate and construct an alley unless the property underwent redevelopment or a change of use that substantially increased the vehicle traffic to this site. ODOT considers it unlikely that Autowerk's continued operation in its current use would trigger this requirement. If safety problems occur and ODOT, after following the process outlined on p. 37-38 of the IAMP, determines that establishing the alley, tract, or easement is necessary to address the safety problem, it will be ODOT's responsibility to purchase right-of-way and mitigate impacts to businesses and property owners. If the alley, tract, or easement is warranted due to redevelopment or a safety concern, there will be a public process conducted by the City of Portland and/or ODOT.

"It is not clear from the IAMP what action(s)if any will be taken to replace the culverts [along Steven's Creek]."	Springer, Dick	4/16/2010	As described in the response to Fairbanks (4/8/2010), the Project is working with other public agencies to replace any affected culverts with designs that improve opportunities for fish passage.
"Can you please identify who represented ODFW and DSL in the discussions that led to the IAMP?"	Springer, Dick	4/16/2010	All Project environmental issues, including those associated with the IAMP, are being addressed through the Project's National Environmental Policy Act (NEPA) process. ODFW and DSL have been involved in every NEPA milestone as part of Collaborative Environmental and Transportation Agreement for Streamlining (CETAS) group.
"As far as the 'few unavoidable impacts to natural resources' described on page E-8 (policy 4.1) -- none of which are described, there is only cursory reference to 'improvements' to 'unnamed streams' and 'wildlife-friendly retaining wall' in Willamette Moorage Park -- whatever that means. This is wholly inadequate to inform the general public about what is proposed or traded-off, and I doubt most citizens are able to access or decipher the DEIS technical reports."	Springer, Dick	4/16/2010	As described in the above response, all Project environmental issues, including those associated with the IAMP, are being addressed through the Project's NEPA process. Through coordination between Multnomah County, BES, and PPR, the Project will continue to investigate and identify mitigation for environmental impacts in the project area. Detailed questions regarding Project environmental impacts should be directed to Project staff.
"The Goal 15: Willamette River Greenway section is also cursory & insufficient for a project with an over-all scope that includes several MILES of relatively natural riverfront plus cumulative impacts at various segments from N. Macadam to Lake Oswego including the Tryon Creek Watershed and confluence."	Springer, Dick	4/16/2010	The findings in the IAMP are meant to address only those impacts associated with the preferred access and local circulation alternative selected by the IAMP. Other than the proposed approach road to be constructed to Macadam Bay, there are no IAMP elements expected to have environmental impacts. Project environmental impacts are addressed in the Project NEPA documents.

CITY OF PORTLAND BUREAU OF TRANSPORTATION

Sam Adams
Mayor

Susan D. Keil
Director

May 6, 2010

Jason Tell, ODOT Region 1 Manager
Oregon Department of Transportation
123 NW Flanders St,
Portland OR 97209

Dear Mr. Tell:

We are writing this letter to show our support for the adoption of the Sellwood Bridge IAMP as an element of the *Oregon Highway Plan*, based on the IAMP's consistency with the City of Portland's *Comprehensive Plan* and *Transportation System Plan*.

The Sellwood Bridge IAMP was developed through collaboration between ODOT, the City of Portland, and the Sellwood Bridge project, with ongoing involvement of residents, property owners, and business owners living in the interchange area. During the IAMP process, ODOT worked closely with its partners to resolve conflicting stakeholder needs and preferences while accommodating multimodal transportation facilities in a very constrained and environmentally sensitive area.

We appreciate ODOT's efforts to respond to the City of Portland's interests and concerns, incorporating input from multiple city bureaus into the refinement and evaluation of circulation and access management alternatives. The IAMP identifies and supports the alternative that best meets the City's vision for the Sellwood Bridge interchange area.

We thank you and your staff for working closely with the City of Portland on the Sellwood Bridge IAMP.

Regards,
Susan D. Keil, Director
Bureau of Transportation
City of Portland

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Oregon
Theodore R. Kulongoski, Governor

Department of Land Conservation and Development
635 Capitol Street, Suite 150
Salem, OR 97301-2540
(503) 373-0050
Fax (503) 378-5518
www.lcd.state.or.us

May 6, 2010

Ms. Talia Jacobson
Region Planner, ODOT Region 1
123 NW Flanders Street
Portland, OR 97209

Regarding: Sellwood Bridge Interchange Area Management Plan

Dear Talia:

Thank you for providing us notice of proposed adoption by the Oregon Transportation Commission of the Sellwood Bridge interchange area management plan (IAMP). Our department supports OTC approval of this IAMP. While our involvement in this IAMP has been limited we do have comments for your consideration.

As you know, our department is primarily interested in IAMPs at freeway interchanges in urbanizing and rural areas where expanded roadway capacity can trigger unintended land use changes. In these situations, we are interested in assuring that IAMPs include measures to protect the planned function of the interchange, support planned development and protect agricultural land. Because the Sellwood Bridge is in a developed urban area and because the proposed bridge replacement and related improvements do not create substantial new roadway capacity we do not have detailed comments on this aspect of the IAMP.

We do note that the bridge replacement involves a significant land use issue in that it requires an exception to Willamette River Greenway Goal (Statewide Planning Goal 15). A goal exception is needed because the city of Portland's plan and ordinances implementing Goal 15 establish a relatively broad setback, which applies to all structures, including bridge support structures. In September 2009, we submitted comments to the city indicating that we believe the criteria for approving an exception were met in this case. We understand the Portland City Council has recently approved a goal exception which will allow the bridge replacement to proceed.

Again, we appreciate receiving notice and the opportunity to comment.

Sincerely,

Robert Cortright,
Transportation Planning Coordinator

From: Gillam, John [John.Gillam@portlandoregon.gov]
Sent: Thursday, April 29, 2010 10:24 AM
To: JACOBSON Talia
Subject: Sellwood IAMP Language

Talia: Here is recommended language to address the concern of the neighbor at the Sellwood IAMP open house. I suggest it be located as part of and at the end of the first bullet under "Medium- and long-term" of the Implementation Process (page 37).

In the event land use or zoning changes are proposed for these properties that requires the development of such an alley then public notification of the proposed action will be provided and review procedures will be conducted as required in the Portland Zoning Code (Title 33).

John M. Gillam, Supervising Planner
Policy & Systems Planning
Portland Bureau of Transportation
1120 SW 5th Avenue, Rm. 800
Portland, Oregon 97204
503-823-7707
john.gillam@portlandoregon.gov

This is a new e-mail address.
Please update your contact info.

From: Gillam, John [John.Gillam@portlandoregon.gov]
Sent: Thursday, April 29, 2010 10:41 AM
To: JACOBSON Talia; 'EATON Michael J'
Cc: Gray, John
Subject: Revise Tree Clearing and Zoning Restrictions Language

For the final as-submitted version of the IAMP we request that the following language be changed for the 4th bullet in Appendix C – Anticipated Driveway Modifications (page 37) regarding the clearance of trees to improve site distance.

1st sentence:
"With the cooperation of the City of Portland, the Sellwood Bridge Project will clear trees…."

Last sentence:
"The Sellwood Bridge Project will conduct the tree clearing…."

This activity should be a project responsibility. Exactly how this will be done, and by whom, when, can be defined in the MOU.

We also request that the term "zoning restrictions" be changed to "zoning provisions" at the bottom of page 11 under the discussion of Future Land Use.

John M. Gillam, Supervising Planner
Policy & Systems Planning
Portland Bureau of Transportation
1120 SW 5th Avenue, Rm. 800
Portland, Oregon 97204
503-823-7707
john.gillam@portlandoregon.gov

This is a new e-mail address.
Please update your contact info.

From: Michael Dowd [email address redacted]
Sent: Thursday, April 01, 2010 6:35 PM
To: JACOBSON Talia
Subject: Sellwood Bridge IAMP question

Talia:

In the OR 43: Sellwood Bridge Interchange Area Management Plan, Figure 9: Option A Overview and Figure 10: Option A Detail both show a new Willamette Greenway Trail running parallel to the streetcar R.O.W. However, Figure 9 shows it ending at SW Miles Street, while Figure 10 shows it extending north, running through my yard, and cutting off access from my property to the street. It shows it then continuing north along the west edge of Willamette Park, where it would destroy the entire row of trees that buffer the park from Oregon Public Broadcasting loading areas and parking garage.

Since both figures are illustrating the same scheme, why is the trail not identical in both? Is the extension of the trail in Figure 10 a mistake, or is it based on something that is actually being considered? And if it is not a mistake, can you give me contact information for someone I can discuss it with? As it would require condemnation of my property, obviously it concerns me.

Mike

Michael Dowd, AIA, President
Dowd Architecture Inc.
[contact information redacted]

From: Michael Dowd [email redacted]
Sent: Saturday, April 03, 2010 9:01 PM
To: JACOBSON Talia
Subject: IAMP question

Talia:

I have gone through the IAMP and want to make sure I am correctly understanding it. So could you confirm the following?:

--In Option A, the houseboat access has been kept to the south of Freeman Motors. Since that is true, the only other IAMP impacts to my property or to the other Miles Street/Place residents look like they would be related to the streetcar and pedestrian path, which ARE near our houses. However, those are really shown for reference only, since they are a separate project outside the IAMP. Whatever form they ultimately take will be determined in that project's own design process.

--Options B and C are also shown, but Option A is the one that was preferred by the SAS group. But that isn't an ultimate, final approval of Option A, as the IAMP states, and not a guarantee that Option A is what will ultimately be constructed.

Does this all sound correct?

Mike

Michael Dowd, AIA, President
Dowd Architecture Inc.
[contact information redacted]

From: Michael Dowd [email address redacted]
Sent: Friday, April 30, 2010 4:55 PM
To: JACOBSON Talia
Subject: sellwood bridge IAMP comments

Attachments: IAMP comments summary dowd.doc; sellwood bridge IAMP comments dowd april 30 rev.doc

Talia:

Attached are two documents. One is a summary of my concerns about the IAMP. To sum it up, I am requesting in it that the IAMP's provisions for redirecting traffic onto Miles Street be made an option, rather than a requirement, that would be considered in a public process in which all relevant impacts would be considered.

The second, longer document is one I wrote prior to the April 20th open house (with a short preface from today) which describes the problems I see with the IAMP. It is very harsh. If I had been responding to the efforts of you and the other project team members, or of your descriptions of how the project will be likely to unfold, I would not have been nearly as harsh. However, I was responding to the IAMP document itself, and I still believe it deserves the criticism. I am submitting it so it is also on the record.

I do want to thank you for discussing all of this at the open house. You certainly took my concerns seriously, and responded thoughtfully to them. I believe that if I sat down with you, the two Mikes from the County, and John Gray from the City Transportation Office to discuss this project thoroughly (and I think we pretty much did that at the open house!) I would either be able to convince you of my points of view--since you are all open to hearing what I have to say--or else you'd be able to convince me to change some of my thinking.

Mike

Michael Dowd, AIA, President
Dowd Architecture Inc.
[contact information redacted]

April 30, 2010

Talia Jacobson
OR 43: Sellwood Bridge IAMP
Oregon Department of Transportation, Region 1
123 NW Flanders Street
Portland, Oregon 97209

Re: OR 43: Sellwood Bridge IAMP

Dear Talia:

This summarizes my concerns about the Sellwood Bridge IAMP.

1. My overriding concern is that the IAMP has provisions (through the requirement that an alley/easement/tract be created to provide access onto Miles Street for the commercial properties on Macadam between the Sellwood Bridge and Miles Street, and associated provisions that allow future restrictions on those properties' Macadam driveways) that will increase traffic on Miles Street, with negative impacts to me and others.
2. My related concern is that the IAMP states safety benefits of redirecting traffic from those properties onto SW Miles Street, but does not give a fair or accurate depiction of the negative impacts in regard to safety—on both Macadam and Miles Street—as well as residential livability, commercial viability, and neighborhood property values.
3. My third concern is that the information in the IAMP, as well as what has been shown to the public, has not made those provisions clear or evident. Specifically, they have never appeared on any drawing of the project, or in descriptions of anticipated driveway modifications, either in the IAMP, or in any previous project materials or presentations. I believe many people would object to these provisions if they knew about them, and I am concerned that the lack of objections will be viewed in the future as acceptance or support for the provisions.

The change to the IAMP that would best address my concerns would be to change the provisions for redirecting traffic onto Miles Street through the creation of an "alley/easement/tract" from something that is "required as legally feasible" to something that is an *option*. Specifically, the provisions should state that if the three commercial properties along Macadam between the Sellwood Bridge and SW Miles Street redevelop, the creation of an alley/easement/tract to provide alternative access to SW Miles Street for those three properties should be an option that may be considered through a reasonable public process that will consider the impacts of that access in regard to safety on SW Miles Street as well as on Macadam, plus residential livability, commercial viability and any other concerns that may arise.

This change was suggested by one of the participants at the IAMP open house—John Gray of the City of Portland Office of Transportation, I believe. It makes sense. As we all discussed at the open house, nobody knows how those properties will develop over time. Yet the IAMP makes the alley/easement/tract onto SW Miles Street a **requirement** if legally feasible. In other words, the IAMP is mandating today a solution that may make no sense in the future. By making the changes I describe above, the access onto SW Miles Street remains an option if it makes sense in regard to the future development, and in consideration of all of its associated impacts.

My impression from the April open house is that this change is in keeping with the desires of the project team. It is certainly also in keeping with ODOT's own stated goals (from the ODOT website) of considering safety, livability and commercial viability in its projects.

Furthermore, the change I request will help make up for the many shortcomings in the IAMP (my second and third concerns) in regard to its many factual and analytical flaws—the IAMP completely ignores many negative impacts of redirecting traffic onto SW Miles Street—and in regard to its burying of the alley/easement/tract provision so that it is almost invisible. Remember, there has **never** been any public presentation or discussion of the IAMP's alley/easement/tract provision, because that provision never was shown or described in any public meeting prior to me bringing it up at the April open house, and as I understand it was never even incorporated into the project until it appeared in the IAMP draft, and after all previous public meetings.

Sincerely,

Michael Dowd
[address redacted]

Date: April 19, 2010
Re: Flaws in <u>OR 43: SELLWOOD BRIDGE INTERCHANGE AREA MANAGEMENT PLAN</u> (March 17, 2010)
By: Michael Dowd
[contact information redacted]

Preface—April 30, 2010:
The following are comments I wrote prior to the IAMP Open House of April 20th. I discussed many of the issues below with project staff. Rather than re-writing these comments based on the open house discussion, I would like to insert the following comments:

--My comments below point out that the IAMP's proposed "alley/easement/tract" requirement for redirecting traffic onto Miles Street would be illegal under the zoning code in certain situations. I do understand that the requirement is proposed to be triggered only if the properties "redevelop" and that project staff views that as creating entirely new development on any site. I also understand that the provision would only be required "as legally feasible". However, my objections still remain, because it is not illegal under all scenarios.
--I wrote that the 1100'-long street in Option B would violate Fire Code regulations that limit dead ends to 300'. I was told that Option B would allow fire trucks to use the current houseboat driveway, so that dead end limit would not be an issue. However, the Option B illustrations and descriptions do not show that the houseboat driveway would be available for fire access, so I had no way of knowing that the illustrations or descriptions were incorrect. Also, since the existing houseboat driveway would be available ONLY for emergency access, the other negative impacts I describe of creating an 1100'-long dead end would still remain.
--Some of the comments below are harsh, and would be overly harsh if I were commenting on the efforts or opinions of the project team. However, I was commenting on the IAMP document itself, and my opinion of it is no better after the open house than it was before.

INTRODUCTION

I own, live in and work at 0753 SW Miles Street. The Sellwood Bridge project initially had no direct impacts on me or my neighbors. That changed drastically last year, when only after the bridge's initial design phase was complete, ODOT raised concerns about conflicts between traffic on SW Macadam, and driveways serving properties between the bridge and SW Miles Street. So, after our chance to comment on the initial bridge design was over, we were suddenly faced with a whole new set of design proposals full of damaging impacts to our neighborhood (and beyond) in regard to safety, traffic, noise, property values, commercial viability and livability.

The IAMP attempts to describe the process, issues, and options that were developed to address ODOT's access concerns. But it is deeply flawed, from its initial botched problem and goal statements, to dozens of factual and analytical errors. As a result, it misstates the process, fails to clearly or accurately convey information, fails to acknowledge or describe the negative impacts of its various design options, fails to accomplish the IAMP's own goals, fails to meet the requirements of IAMPs mandated by state law, fails to meet ODOT's own agency goals, and sabotages its usefulness as a tool for carrying the project forward.

The negative impacts that are of most concern to me—and to many other nearby residents and businesses--are those that would result from redirecting traffic generated by the commercial properties between the Sellwood Bridge and Miles Street to the rear of those properties, and then

out to Miles Street, rather than keeping it at the existing driveways on Macadam. In other words, redirecting highway traffic off the highway, and into the neighborhood. These impacts would be made even worse if the Macadam driveways were restricted (with no-left-turn medians, for example) and yet worse if they were closed, because that would make the Miles Street connection the **only** access for those properties.

Option B, which proposed doing exactly this by creating a road parallel to the rail tracks, was strongly opposed by me and my neighborhood, and rejected by the Senior Agency Staff group. When the SAS group chose to carry forward Option A--which did not alter the Macadam driveways, or redirect traffic onto Miles Street--it was a relief to me and every commercial and residential neighbor that I know.

But this IAMP puts the redirection of traffic onto Miles Street back into the project! Not openly, as in Option B, but through provisions—hidden in most of the IAMP—that allow ODOT to restrict or close off the commercial properties' Macadam driveways, and force those properties to create a joint eastern access "alley" that almost exactly recreates the street that was so strongly opposed! In other words, highway traffic is once again proposed to be directed off the highway and into the neighborhood, and the Preferred Option, which was supposedly based on Option A, now is in effect much closer to the rejected Option B!

If the IAMP eliminated this redirection of traffic onto Miles Street, it would closely match Option A, and I would have no objections to it. But I object strongly to its inclusion, to the fact that it was inserted after the public, and perhaps even other agencies, were led to believe that it had been rejected, and to the fact that the IAMP does not acknowledge the many negative impacts that it will have—including impacts on safety and traffic flow that were the whole justification for its being snuck back in.

THE IAMP HAS BEEN MANIPULATED TO FAVOR ODOT'S GOAL OF REDIRECTING HIGHWAY TRAFFIC OFF THE HIGHWAY AND INTO THE NEIGHBORHOOD

It has been clear to me and many people that restricting and even closing the driveways of the Macadam commercial properties between the Sellwood Bridge and SW Miles Street, and redirecting their traffic onto Miles Street, has been a goal of ODOT's in this project. Earlier schemes, supported by ODOT, proposed **exactly** that.

But there are many reasons why this goal is wrong, which would be clear to anyone seeing a clear, objective, factual analyisis, which this IAMP should be, but isn't. Speaking hypothetically for the moment, **if ODOT wanted to manipulate the IAMP to support its goal of removing highway traffic from the highway, what kind of errors or manipulations of facts or analysis would be helpful? Here are SIXTY-NINE possibilities in several categories:**

In regard to the IAMP's Problem Statement:

--define the "Problem" so narrowly that it obliterates almost all the IAMP approval criteria mandated by state law. List "access" as the ONLY issue of concern to properties within the Study Area. That way, nobody will notice that under the approval criteria required by law, issues such as livability, impacts on neighboring properties, are extremely relevant.

(Comment: No wonder so many people have felt that ODOT has shortchanged their concerns related to noise, increased traffic, safety, parking, livability and commercial viability—according to the Problem Statement, those categories of concern do not exist! Even if ODOT did agree that those are legitimate concerns that the IAMP should address, the fact that only "access" is mentioned is telling of ODOT's focus. Based on this IAMP, ODOT clearly has misunderstood its legal duty to consider these concerns.)

In regard to the IAMP's Goal Statement:

--write the IAMP Goals to narrow its focus from the approval criteria required by state law, so that objections to impacts such as livability, property values, and other factors beyond simple traffic access, are not part of this project
--include an inane, "red herring" factor in the goals—the subdivision and partitioning of the commercial properties on Macadam between the bridge and Miles Street. There are three ownerships there. Two (Freeman Motors and Autowerks) have single buildings on them that occupy almost their entire sites. The third (Heuker) is not large for a commercial site. There is no incentive to those owners, or logical reason at all, to ever partition or subdivide them. This factor was obviously inserted to justify the creation of a back access to the sites that redirects traffic onto Miles. There is no other possible logical reason for including it.
--at the same time that the inane factor is included, don't specifically state goals that should be important, such as addressing access issues without harming commercial viability or residential livability, because these goals don't support redirecting traffic onto Miles Street
--don't mention that one of ODOT's three own agency goals—listed on the front page of its own website—is "Improve Oregon's livability and economic prosperity", because redirecting traffic onto SW Miles Street contradicts this goal

In regard to project facts:

--understate the number of residences in the neighborhood, giving the impression that fewer people will be negatively impacted
--make a list of the houses in the neighborhood (in the Existing Land Use section) but "forget" to list **ALL 14** houses on Miles Place on the water, and ALL 4 additional houses on the north side of Miles Street, for a total of 18 out of 25 omitted!) again giving the impression that fewer people will be impacted. Hope that nobody notices that anyone who can read a tax map should have got this right
--in the same section, don't even mention the businesses on the north side of Miles Street that would have severe impacts to them if traffic on Miles Street increases, not the least of which could include (by the project team's own descriptions, not mentioned in the IAMP) losing most of their parking and loading
--show on a zoning map that the part of the neighborhood closest to the new route is zoned for commercial--not residential—use, to downplay the impacts of increased traffic
--use outdated aerial maps to show that that same lot is vacant rather than developed with a new $1.5 million two-unit residential project, to downplay the impacts of redirecting traffic onto SW Miles Street next door to that lot
--leave off any indication of the City's new pump station in the R.O.W. at that same corner, because it conflicts with the trail as shown in Option B, and would have dramatically increased the cost of that option to deal with that

--leave off the Existing Zoning map that the project falls within the Macadam Plan District, because that would call attention to the fact that redirecting traffic onto Miles Street conflicts with the district's goals and policies. To help make sure nobody notices this oversight, make sure not to mention the Macadam Plan District in the entire IAMP!
--on the Existing Development and Resources map, incorrectly show the Willamette River Greenway Trail stopping at the south end of SW Miles Place, rather than continuing through SW Miles Place and northward through the park. That way, when people figure out that adding traffic on Miles Street also will lead to parking changes that will force commercial traffic onto Miles Place to turn around, they won't realize that they'll be doing that in the middle of one of the city's main pedestrian/bicycle trails
--in the IAMP sections on Existing Uses and Future Uses**, leave out all mention of the proposed streetcar line connecting Lake Oswego to Portland**—even though that is the single most significant future use in the area--and the associated bike/pedestrian trail. This will downplay the fact that there will be negative impacts to these caused by redirecting traffic onto Miles Street, including drastically increasing vehicle crossings over the tracks, and dumping traffic onto the street that is a main bicycle and pedestrian connection to the Willamette Trail from the neighborhood to the west

(Comment: if the IAMP can't even get simple facts right, how can it be trusted in the more complicated job of accurately stating the impacts of the various options? The fact that so many of the errors involve the residential neighborhood seems to indicate that either the neighborhood has not been important to ODOT, or that presenting the facts correctly could present problems for ODOT.)

<u>In regard to describing public outreach and involvement:</u>

--write the Development Process description to give the impression that the residential neighbors were made fully aware of the access issues from the start, and that the options were the outcome of a fair, inclusive process. The IAMP states, "The IAMP core team conducted interviews with private property owners and agencies affected by access management issues in February, 2009". The core team then developed access options in March and April. In May, project staff refined these options. But it was not until nearly June that I and other Miles Street residents were notified of the plan (and even then, not directly), and even at that meeting we were not allowed to see the schemes that had been available since March.
--give the impression that residential stakeholders were treated equally to commercial ones in regard to notification and involvement, even though they were not. Don't mention that even after some property owners had had months of private meetings with the project team, residential neighbors still didn't get even a postcard!
--don't' mention that even when I and my neighbors asked ODOT staff in July how long ago the access issues had been identified, we were told "a few weeks ago", rather that actual five months!
--leave off from the list of properties in the Study Area the businesses on SW Miles Street that will bear some of the most extreme impacts of the traffic changes. By not mentioning them, it is less likely that people will notice that they will be negatively impacted, or be reminded that they received almost no attention during the entire process
--beyond leaving those properties off the list, ignore the businesses there during the entire project process, even to the point of not informing them of it, or inviting them to meetings
--**don't mention that the information shown in the public outreach process has been so inaccurate and biased (it had the same factual mistakes and analytical flaws that are in the IAMP) that much of it was worthless, and that fact tainted the public input, *and probably even the agency input.*** For example, when the public was shown a scheme but not told of its

negative aspects (such as the safety issues of Option B's 1100'-long street that fails to meet the Fire Code) then the fact that the public didn't object is meaningless. (Oops—bad example. That scheme was so flawed the public rejected it anyway. A better example would be this current IAMP, in which not only are the negative impacts of the Preferred Option's alley/easement not discussed, the alley/easement provision itself doesn't even appear in any of the diagrams!)
--leave out the fact that the idea of accomplishing the redirection of traffic out of the Macadam properties through requirements for easements/alleys etc. (that is, via any method than Options B's new street) was NEVER mentioned to me or anyone I know during the entire year-long process. In fact, commercial property owners didn't know of the easement/alley requirement until *I* told them earlier this month!

<u>In regard to the illustrations and descriptions of the options:</u>

--In Figure 2: Preferred Alternative, cut the map off far below the Miles Street/Place neighborhood, to give the impression that there will be no impacts in it, and by all means don't include on that Figure any mention or indication of driveway closures on Macadam, or redirection of traffic onto Miles Street. It is important that the ODOT proposal to redirect traffic onto Miles Street be as inconspicuous as possible in the IAMP, since there has been so much public opposition to it in the past
--In Figures 9 and 10, illustrating Option A, which was chosen as the preferred alternative, leave out all graphics or notes mentioning the intended traffic redirection and driveway closures, so people viewing them will get the impression that those aren't in the plan
--In Figure 10, show a colossal mistake—an extension of the trail through my property on SW Miles Street and into Willamette Park, that would force condemnation of my house, and remove ALL the magnificent trees that buffer the park from the rail R.O.W. and OPB's parking garage and loading areas--so people will focus on that, rather than dig deep into the details of the text to find out about the re-routing of traffic onto Miles Street
--**do** show a proposal for redirecting traffic onto Miles Street—the creation of a new street--on another option (B) but state that this option is not designated to be carried forward, to give the impression that the redirection of the traffic onto Miles Street has been dropped from consideration. And even it that option, don't show any indication that the Macadam driveways may be closed in the future
--show some red lines that could be interpreted as traffic redirection on the third scheme (Option C) but don't label or explain them on the diagram, or in the option description, so that people will overlook them, but then will not be able to claim later that that option didn't show or encourage any traffic redirection
--Use Miles Street, Miles Place and Miles Court interchangeably throughout the IAMP, even though they are three distinct streets, just to confuse people
--in all options, show the Macadam driveways as being kept active, then bury ODOT's interest in removing them in the text at the end of the report

<u>In regard to the written description of driveway modifications:</u>

--include a section titled "Anticipated Driveway Modifications" which describes in detail the modifications to driveways elsewhere in the project area, but mentions only one of the several driveways serving Autowerks and the Heuker property, and make no reference to ODOT's interest in restricting the others, or in redirecting traffic through a new Miles Street driveway serving *several acres* of commercial uses. That way, people interested in seeing which driveways

will be modified will think that by reading the section entitled "Anticipated Driveway Modifications" they will learn which driveways are anticipated to be modified

In regard to future traffic projections:

--describe the Heuker property as "a group of small retail shops" rather than as having significant amounts of industrial service and other non-retail uses (general contractor, painting contractor, hoop manufacturer, etc.). That way, it will seem less bizarre that the IAMP bases its future traffic assumptions on 100% retail and office uses. Incidentally, retail uses have much higher traffic generation than non-retail uses, so this has the benefit to ODOT of giving it additional ammunition for its ultimate goal of redirecting traffic onto Miles Street
--in conjunction with this, state that current non-retail uses--such as those same substantial amounts of the Heuker property, and ALL of Autowerks—are assumed to remain over time, in order to make the future use assumptions seem reasonable. But then, in those same assumptions, entirely replace those uses with office and retail uses, which have much higher trip generation numbers, again giving additional ammunition for redirecting traffic onto Miles Street
--once you've misled people by calling non-retail space retail, and by saying that you're assuming that Autowerks will remain, but then categorizing it an office/retail use, don't give those sites any traffic reduction credit for being next to the proposed streetcar, or the enhanced bus service that would be its alternative. Instead, base your vehicle trip figures only on the standard "Institute of Transportation Engineer's trip generation raters for general office building and specialty retail center". In fact, don't mention the streetcar or enhanced bus service anywhere in the entire IAMP as affecting traffic projections, to lessen the chance that people will notice that they weren't factored into traffic counts. But hope that the Lake Oswego-to-Portland Transit Project team doesn't notice this, because I think they're hoping that the streetcar might eliminate at least a couple vehicle trips to and from these sites!
--don't mention the bike trail as having any impact on traffic reduction, either!
--don't mention the obvious disconnect in logic between assuming on the one hand that the entire site will be redeveloped as retail and office, and on the other that access over time to the entire area will be restricted on Macadam, and redirected onto Miles Street. In other words—especially in regard to the retail use—assume a use that is completely dependent on people being able to find out how to get to it, and then make it nearly impossible to find the access. Hope that nobody reading this IAMP is a real estate developer, who might argue that office and especially retail sites don't get developed if it's clear that people won't be able to figure out how to get from the street to the parking lot.
--don't mention bicycle or pedestrian traffic as a form of traffic, because people may notice that Miles Street is a major, officially-marked public bicycle and pedestrian access route to the Willamette trail, and that if the trail improvements proposed as part of the Lake Oswego-to-Portland Transit project happen, that pedestrian and bicycle traffic on Miles Street will increase dramatically, which means that dumping a bunch of new car and truck traffic onto Miles Street is a particularly bad idea, and certainly not a "safety enhancement"!

In regard to compliance with zoning regulations:

--ignore, as mentioned previously, that the required alley/easement directing traffic from the commercial properties onto Miles Street is **illegal** for Autowerks to use, as mentioned already, and may not even be legal for Freeman Motors to use, since it's businesses includes a prohibited use (vehicle repair) as an accessory use

--leave out the fact that the commercial properties' zoning requires that they orient their entrances towards Macadam, so redirecting vehicular access to them onto Miles Street and to the rear of the sites creates an unresolvable conflict---entrances oriented to the front, customers arriving from the rear—that will force future development into serious compromises to the detriment of the whole area
--leave out that City design policies also encourage and/or require, in addition to orienting entrances towards Macadam, providing ground-floor windows, and creating pleasant, pedestrian-friendly facades along Macadam, so anything that encourages customers to enter from the rear—as does the alley/easement requirement of the Preferred Option—directly contradicts that
--leave out the fact that the Planning staffperson position for this project was eliminated, and that nobody on the entire project team seems to really have any idea of whether it complies with zoning regulations or policies at all. That is one of the reasons that ODOT and the City Transportation office are pursuing a traffic redirection strategy that is so contrary to the Zoning Code that it is not even legal!
--ignoring the issue of whether the "alley/easement/tract" that dumps Macadam traffic onto Miles Street is even legal, ignore that any such "solution" would still have to meet zoning regulations in terms of width, landscape buffer requirements, setbacks from it, pedestrian accommodations, etc. These could substantially eat into the width required for it, further impacting the commercial properties. I understand that the proposed "alley/easement/tract" does carry an "as legally feasible" clause, but isn't it important to know whether it even is "legally feasible"? Hope that nobody brings up this issue!

<u>In regard to project costs:</u>

--leave out cost of tearing out and relocating BES's pump station on Miles Street—work that could be necessary if traffic is redirected onto Miles Street. In fact, leave the pump station's entire existence out of the IAMP, since these relocation costs would be in at least the hundreds of thousands of dollars, and would make the cost projections higher
--don't include any money associated with rebuilding the Miles Street/Macadam intersection to include a signalized left turn lane, which the project team stressed would be required if additional traffic is redirected onto Miles Street. Leave out the fact that they even brought this up as well.
--don't include the costs of rebuilding Miles Street to add new sidewalks on both sides, which the project team also stressed would also be necessary if traffic is increased substantially
--don't include any realistic cost increases to the streetcar or bike path that could result from this project (such as increases caused by forcing the rail alignment eastward as a result of creating a new street under Option B)
--don't ever mention anywhere in the IAMP that the traffic redirection would have significant costs for the residential properties—in reduced property values, and need for buffering from noise, headlights, etc.
--especially do not mention that to get traffic from Freeman Motors past the east end of Autowerks, as the plan calls for, a large chunk of Autowerks' building would have to be torn down. The same goes for several small structures on the Heuker property, as well as the entire back portion of the main building. These costs could be in the millions of dollars. Use the logic that these are private rather than public costs, so they don't exist. Also, don't mention the cost magnitude—or even the size—of the land the commercial properties would be required to give up create the "alley/easement/tract" that would redirect highway traffic onto SW Miles Street. Also be sure to neglect to consider that in the event the easement/alley is considered a "taking" that the costs would become public anyway
--on the matter of "takings", don't consider the issues relative to one property owner being required to give up land so that another private property owner can use it

In regard to the Evaluation Matrix and other analyses of impacts:

--include a "Stakeholder Preference Issues" column in the matrix, but fail to mention many of the stakeholders' main concerns, such as commercial property owners' concerns that their customers won't be able to find how to get to their businesses under Option B, or under the Preferred Option if their driveways on Miles Street are restricted
--mention impacts that are less significant than one that are not mentioned. For instance, mention maintenance as an issue with Option B's 1100'-long driveway, but no the extreme safety dangers of creating that long of a dead end for emergency access
--mention safety benefits of removing driveways but do not mention any of the corresponding safety drawbacks. For instance, mention the reduction of left turns on Macadam, but not the danger of dumping increased traffic onto Miles Street right next to the streetcar crossing, and amidst bicycle and pedestrian traffic
--state specifically in Option A that, even though it (the scheme, not the matrix) includes ODOT's plan to redirect traffic onto Miles Street, and gives ODOT the option over time to redirect ALL traffic from the commercial sites onto Miles, that the traffic impacts will be absolutely zero ("same as the no-build option")!
--again in Option A, show that there will be absolutely no impacts on the Miles Street/Place neighborhood, even though it includes the traffic redirection requirement. Just to be sure, leave mention of it out of both the "Traffic Impacts" and the "Stakeholder Issues" section (or am I confused from the IAMP's completely confusing description of what is Option A, what is the Preferred Option, and what is the difference between them?)
--in Option B, leave out from "Residential Impacts" any mention of increased traffic on Miles Street and Miles Place caused by forcing all Miles Street businesses' traffic onto Miles Street and Place to turn around, and leave off from the "Streetcar Impacts" that this adds two vehicle crossings over the streetcar tracks for dozens of additional vehicles per day
--very important!—leave out any discussion of exactly how people driving to any of the businesses on Macadam could actually figure out how to get to them in the absence of left turns or even of driveways. After all, the fact that the access to those properties could be hidden from view from Macadam would be an embarrassing negative, as would the fact that people heading south would need to know to turn onto Miles Street to access businesses that at that point would be so far ahead of them as to be invisible. Leave out how people driving down Taylor's Ferry Road would need to know to get in the left-hand lane to go down Miles Street, rather than the right-hand lane to head south to the Macadam businesses, even before they could see those businesses, and even before they could see Macadam! Leave out how long a sign would have to be just to list the businesses that occupy those sites, let alone provide directions on how to get to them
--leave out any mention that if anybody heading south on Macadam to any business without left turn access--or even driveways--missed turning onto Miles Street (necessary before being able to see the business) to access it, the next available turnaround route is **several miles** down the road, in downtown Lake Oswego! I'm sorry, that's an exaggeration—people could also go across the Sellwood Bridge and back, or turn around in Dunthorpe, or simply do an illegal U-turn
--leave out the safety ramifications of the illegal U-turns above, as well as of people slowing down and becoming confused as they search for where to turn to get to the businesses. Don't mention that this safey impact could be worse than any safety impacts caused by keeping the driveways as is
--don't mention under "Streetcar Impacts" any safety issues caused by creating what is basically a new intersection right next to the Miles Street streetcar crossing

--don't' mention that Miles Street is a major bike/pedestrian connector between the Willamette Trail and neighborhoods west of Macadam, because that might suggest that adding substantial auto and truck traffic on Miles Street has negative impacts on those uses
--don't mention **that the 1,100'-long new street shown in Option B is more than triple the length of the 300' maximum length allowed under the Fire Code for dead ends, and as such is illegal and cannot be approved no matter who wants it.** And under "Traffic Safety Impacts" don't mention the safety issue of directing all that traffic onto SW Miles Street, when that is the only emergency access for our neighborhood—it might scare people if they realize that a single double-parked vehicle could cut off emergency access for a huge number of people. *(Comment--This is a fatal flaw in Option B, and one that the project team is well aware of —I sent them a letter on it months ago after confirming the regulations with Fire Bureau staff.)*
--also don't mention that Option B's 1100'-long dead end lacks a Fire Code-compliant turnaround at the end, so would be illegal even if it were 799' shorter
--don't mention that the required turnaround is so large, that if provided it would remove a substantial portion of the houseboats' parking lot
--also don't mention a second fatal flaw in the dead end--that since there is no turnaround, and no room for it to be located on public property, that any vehicle entering it by mistake, or entering when the houseboats' parking gates are closed, would need to either trespass onto private properties to turn around, or **drive 1100' backwards**, then **back out** onto SW Miles Street. And certainly don't mention any safety impacts due to this!
--don't mention that since Option B requires the streetcar tracks to be moved east, it would eliminate much of the buffer space between the streetcar tracks and the neighborhood, and require massive retaining walls
--don't mention the impacts to businesses on Miles Street of losing most of their on-street parking, and most or all of their loading access, which the project team said would be required to accommodate additional traffic on Miles Street if traffic is redirected onto it. To make sure that people overlook this, don't even include those businesses in the matrix or anywhere else in the entire IAMP
--in Option C, which also includes redirecting traffic onto Miles Street, including paving the "backage road" to encourage its use, state that there are "No impacts to SW Miles Ct. (sic) residents". Bolster this by showing in the stakeholder issues column that we have no concerns about that, even though redirecting traffic onto Miles Street is the single most objectionable part of this entire project to many residents here
--also under Option C, list the increased traffic on SW Miles Street (misnamed "Court") as a safety enhancement (!) rather than a drawback
--leave out any mention in the entire IAMP that vehicle service is a **PROHIBITED** use in the Macadam Plan District, and that by redirecting traffic from Autowerks off of Macadam and onto Miles Street via another site, the scheme expands the area of--and increases the impact on the residential neighborhood--of one of the larger vehicle repair businesses in the City. This makes Option B, as well as the Preferred Option's requirement for creation of an easement/alley, **ILLEGAL**
--in regard to impacts on the businesses, don't list as a negative impact the alley/easement requirement, which would require those properties to give up a portion of their land, and in the case of Autowerx and Heuker, tear off the ends of their buildings!
--don't list anywhere the bizarre unfairness of requiring Autowerks to someday tear off the back of their building and grant an easement to build a driveway that it would be illegal for Autowerks itself to use!
--in Appendix E: Compliance, restate that redirecting traffic onto Miles Street will enhance the project's safety, without mentioning the many safety problems it will create on Miles Street and even on Macadam. Just out of hubris, add that this "will greatly enhance the safety of bicycle and pedestrian facilities" even though what the driveway will do is to take traffic that is currently

confined to the highway, and not only redirect it alongside the new bicycle and pedestrian path, but also direct it onto Miles Street, which is a major connector between that path and the neighborhood to the west

--continually mention throughout the IAMP the number of accidents in the study area and focus on those between the bridge and Miles Street, to build up the relationship between accidents and driveways. But do not mention that many of the accidents in the study area were at the Miles/Macadam/Taylor's Ferry intersection—the same intersection at which the alley/easement of Option A, or the new street of Option B, proposes to significantly ***increase*** traffic. And don't mention that last summer, I contacted the project team to tell them that trees were so overgrown along Macadam near the houseboat driveway that their branches were actually touching the street, drastically cutting sight distances, or that a new street tree has been planted directly between the same driveway and oncoming traffic from the north, or that cutting a few trees north of that same driveway could also dramatically improve sightlines, and could have been done years ago, instead of **just blindly collecting accident statistics and proposing immensely costly and ill-considered access changes**. And don't mention that the entire side of Macadam between the bridge and the houseboat driveway is lined with solid concrete barriers, which make it very difficult to see the driveway, and give drivers the impression that they are on a stretch of highway that has no traffic entering it. **Changing any of these conditions could have made this stretch of Macadam much safer, and reduced the accident numbers which are now so precious to ODOT.**

CONCLUSION

I just listed **sixty-nine** errors and manipulations of facts and analysis in the IAMP. I'm not asserting that any particular one of these items above was done intentionally. On the other hand, every single one does just happen to support ODOT's interest in redirecting highway traffic off of Macadam and onto SW Miles Street. None of the IAMP's flaws skew it the other way. Therefore, it is impossible for me NOT to believe that the IAMP was manipulated intentionally to support that ill-advised strategy. This is a strong accusation, but on the other hand, it is entirely consistent with the impression that ODOT has given people throughout this project.

Plus, even if it is entirely by chance—rather than intentional--that the IAMP contains so many flaws that make it easier to justify rerouting highway traffic off the highway and into the neighborhood, that doesn't excuse it, or mean that the IAMP should not be corrected, and the proposal to redirect traffic onto Miles Street dropped.

I am the only person I know of outside any government agency who has read the IAMP. Even those who have read it—including agency staff--are unlikely to know how bad the impacts would be of redirecting traffic onto Miles Street, because the IAMP is so flawed in regard to facts and analysis. For that matter, the IAMP does such a good job of hiding its provisions for redirecting traffic onto Miles Street, that anything less than a word-for-word reading of it gives no clue that the provisions even exist!

By adding the provisions for redirecting traffic onto Miles Street back into the project, the access solution bears almost no resemblence to Option A on which it is alledgedly based. Redireciting highway traffic off the highway and onto a small local street flies in the face of virtually every City and regional land use and transportation policy. The negative impacts have not been considered in the IAMP, as is required by state law.

In fact, using the same analysis measures of the IAMP, making Macadam one-way northbound, and redirecting southbound traffic onto SW Corbett, would make sense! All the left-turn conflicts on Macadam would be eliminated, and taffic could speed up greatly. It would be a disaster for the Corbett neighborhood, but as has been the case in this IAMP, effects on livability, or safety or traffic OFF of the highway would not show up as negative impacts, or even as issues!

Finally, this project needs to acknowledge Macadam Avenue's role as much more than a through route. Macadam Avenue has hundreds of driveways, intersecting streets, and stoplights between the Sellwoood Bridge and downtown. This project must acknowledge that the Macadam neighborhood starts at the Sellwood Bridge, not at SW Miles Street, and that if there are access issues south of Macadam, that the solution cannot be to simply close or restrict driveways and dump the extra traffic onto SW Miles Street.

FINALLY

The IAMP's Circulation and Access Management Plan section's introduction says it all—and correctly (maybe):

Sentence one of the Circulation and Access Management Plan on page 36 states:

"A majority of the members of the SAS group…recommended IAMP Option A as the circulation and access management plan for the Sellwood Bridge/OR 43 interchange area (see Figures 9 and 10)." *(Note: Figures 9 and 10 illustrate a scheme that has nothing in the diagram or notes mentioning any restrictions to any driveways serving the commercial properties on Macadam—excepting the one serving an unused garage door that is not in dispute—or any sort of new, increased or altered access from those properties onto Miles Street)*

Sentence two states:

"IAMP Option A, which will be implemented as part of the new interchange construction…"

Sentence three states:

"The interchange construction project will include modifications to driveways between SW Taylors Ferry Road and the interchange. The intent of these modification will be to move in the direction of meeting ODOT access management spacing standards while providing reasonable access to existing properties and businesses. Appendix C describes anticipated driveway modifications." *(Note: Appendix C lists all the driveways modifications anticipated for the project, and makes no mention of any restrictions on the driveways serving the Macadam businesses—again with the exception of the unused garage driveway, nor does it make any mention of redirecting traffic onto Miles Street..)*

Putting this all together, there is only one conclusion, based on direct, un-manipulated quotes. The SAS group recommended Option A. Option A will be implemented. Option A does not propose any changes or restrictions to the commercial properties' driveways on Macadam. The result of this will be to provide REASONABLE access to existing properties and businesses.

So, if the specified intent of the project is to implement a scheme that contains no redirection of traffic onto Miles Street, and no changes to the Macadam businesses' driveways, and that solution is deemed "reasonable" then why is the IAMP straying so far from that by trying to pursue the redirection of traffic onto Miles Street?

Or, conversely, if the intent of the project really is to implement redirecting highway traffic onto SW Miles Street, why is the above section written to say exactly the opposite? At the minimum, it shows that the IAMP is poorly written, because it uses "Option A" and "Preferred Option" interchangeably.

From: Jean Fairbanks [email redacted]
Sent: Thursday, April 08, 2010 11:52 AM
To: JACOBSON Talia
Subject: Sellwood Bridge

Hello Talia Jacobson, The enclosed is a copy of the letter that was sent to ODOT, from the Macadam Bay Homeowners Association. Our floating home moorage, consists of 35 houses, located on the Willamette river, just north of the Sellwood Bridge. We feel, and we have expressed ourselves at every opportunity, that the proposed entrance to our homes has SERIOUS SAFETY ISSUES. Asking us to enter/exit from Macadam Avenue, on a curve, with no light, and reconstruction of a large interchange on Macadam, is DANGEROUS ! We invite you to visit our homes, and help us to be able to safely enter and exit our community. We feel that our SAFETY has not been considered. Sincerely, Jean Fairbanks

Regarding the proposal to relocate the entrance/drive into Macadam Bay Moorage
We have serious concerns regarding the relocation.

Stephen's Creek watershed restoration project, has cost a half a million and has taken over 2 years in planning and over six months to complete, via the Bureau of Environmental Services. It is a testimony to the City's commitment to restore Stephen's Creek. The proposed city relocation of our entrance would cover Stephen's Creek directly adjacent to the just completed restoration!

The proposed roadway would be built on the Willamette Moorage Natural Area and the South Portland Riverbank Area.. This small but significant property cannot be replaced, as it is one of the last undeveloped riparian habitats left in Portland.

We are concerned that mature trees and numerous viable cedars and firs would be cut down, replaced by a cement road.

The visibility of the proposed road is dangerous, as visibility to the south is obstructed by a curve. The proposed new entrance demands two additional sharp turns, making it more difficult to enter, which could negatively effect the value of our houses.

The proposed new entrance would have to be wide enough to allow for commercial trucks, fire trucks, etc. The current entrance is only 20' wide at the trolley tracks, which would demand significant re-construction of the current entrance.

The proposed entrance would be less direct, and could have a negative effect on our continued security problems.

We would like to offer a simple proposal of our own, in hopes that you would seriously consider it, as we believe it offers the best solutions.

The problem of entrance to Macadam Bay could be solved be putting an "on demand" stop light on Macadam Avenue. There are other such lights on Macadam Avenue ! This simple solution would be the most cost effective, would not destroy park, or trees or creeks and represents the best plan for the residents of Macadam Bay. (After all the proposed new entrance would necessitate an on demand light, as there would be no visibility to the south.)

From: Jean Fairbanks [email address redacted]
Sent: Friday, April 16, 2010 3:08 PM
To: JACOBSON Talia
Subject: RE: Sellwood Bridge

Hi Talia, I think the problem that I am having, is that I look at the plan and then I walk to where a "new entrance" is going to be built, and for the life of me, it will not fit. There is simply not enough space to build a road (that will fit garbage and fire trucks). It may look good on paper but....is it at all possible that some ODOT person could actually come out and put some stakes in the ground, to show us how it will look??? I think I wouldn't have so much opposition if I could believe it would fit between the trolley tracks (will you build a bridge over Stephen's creek (did you know there was a deep gully there?) thanks, Jean Fairbanks

From: Denise Lawrence [email address redacted]
Sent: Friday, April 30, 2010 4:43 PM
To: JACOBSON Talia
Subject: Sellwood bridge project comments

Talia -

Here are a few comments I have about the IAMP and the several sections in it that effect Autowerks NW:

One section leaves open to optionally use that easement that would run through our building if Autowerks were to lose that portion of its property contemplated for an easement by means of dedication or condemnation, it will effectively cause Autowerks to close down its business. That easement would remove a portion of our building that would remove one of our paint booths and our entire detail department. Due to the restrictive zoning laws affecting auto body shops in the City of Portland, there is no other site of comparable quality as the current Autowerks site available to conduct its business. Therefore, in balance, the harm to Autowerks far out ways the benefit to the County and the Bridge improvement project. Lastly, I will fight this very strenuously both in the public forum aspect of the process and, if necessary, through the legal process.

Thanks,

Denise Lawrence

Autowerks NW, Inc.
[contact information redacted]

From: Springer, Dick - Portland, OR [dick.springer@or.nacdnet.net]
Sent: Friday, April 16, 2010 12:50 PM
To: JACOBSON Talia
Cc: 'emily.hicks@ci.portland.or.us'
Subject: Portland BES West Side Streams Water Quality report

Dear Ms. Jacobson -- Thanks for sending a printed copy of the OR 43 Sellwood Bridge IAMP. There are several comments I'd like to offer initially. I have corresponded earlier with Ms. Emily Roth with Portland Parks and have copied Ms. Hicks with Commissioner Fish's office. Referenced above is a 36-pg document I just received which describes the current status and recent extensive and expensive restoration work on Stephens Creek.

As you know, this is the watershed and confluence that will be heavily impacted by Hwy 43 re-build plus expanded two-track rail right of way, bike-ped lane AND a new access road -- alongside and on top of already culvert-limited T & E fish passage due to the existing highway, single-track rail line and bike-ped path on fills/ culvert vs. bridge structure.

It is not clear from the IAMP what action(s)if any will be taken to replace the culverts.

Can you please identify who represented ODFW and DSL (public owner of submerged/submersible lands up to the high water line) in the discussions that led to the IAMP? If there are written comments from these agencies, it would be helpful to review them. This study area is within the Willamette River Greenway, and is critical habitat for many T & E species -- I doubt any private developer would enjoy the same latitude or discretion that the public agencies have given to themselves.

As far as the 'few unavoidable impacts to natural resources' described on page E-8 (policy 4.1) -- none of which are described, there is only cursory reference to 'improvements' to 'unnamed streams' and 'wildlife-friendly retaining wall' in Willamette Moorage Park -- whatever that means. This is wholly inadequate to inform the general public about what is proposed or traded-off, and I doubt most citizens are able to access or decipher the DEIS technical reports.

As I mentioned in an earlier conversation, this IAMP is different I suspect from any other done in that it is attempting to meld & to integrate three very different combined project agenda -- (1) rebuild the bridge, (2) re-build the Hwy 43 interchange to accommodate increased commuter car traffic to and from Clackamas county, particularly Lake Oswego & West Linn, and (3) re-design the bridge & interchange project(s) to provide streetcar access plus greatly expanded bike/ped trail access.

The Goal 15: Willamette River Greenway section is also cursory & insufficient for a project with an over-all scope that includes several MILES of relatively natural riverfront plus cumulative impacts at various segments from N. Macadam to Lake Oswego including the Tryon Creek Watershed and confluence.

The above-reference report can be found at the following URL. Thanks for your assistance and kind consideration.

http://www.portlandonline.com/bes/index.cfm?c=30938&a=292285

Very Truly Yours,

Dick Springer, Manager
West Multnomah Soil & Water
Conservation District
2701 NW Vaughn St., Suite 450
Portland, Or 97210
dick@wmswcd.org
(503) 238-4775 x106
cell (503) 349-7496

fax (503) 326-3942

RE: Portland BES West Side Streams Water Quality reportFrom: Springer, Dick - Portland, OR [dick.springer@or.nacdnet.net]
Sent: Friday, April 16, 2010 3:09 PM
To: JACOBSON Talia
Subject: RE: Portland BES West Side Streams Water Quality report

Hey Talia – Thanks for your prompt response and any additional info you might share. Like most citizens, I've lost track of the number of consultants and how much of the work they are doing compared to in-house staff, and how that perspective and approach may impact the parameters recommended to elected decision-makers. There was a time when most highway & bridge work was pay-as-you-go and most pre-engineering, design & construction management was done in-house – in the past 10-15 years, the trend appears to be more bonded debt and privatization. I'm not sure if that qualifies as progress. Best, Dick