



# 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

### NOTICE OF ADOPTED AMENDMENT

July 11, 2007



TO: Subscribers to Notice of Adopted Plan  
or Land Use Regulation Amendments

FROM: Mara Ulloa, Plan Amendment Program Specialist

SUBJECT: Umatilla County Plan Amendment  
DLCD File Number 002-07

The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. A copy of the adopted plan amendment is available for review at the DLCD office in Salem and the local government office.

Appeal Procedures\*

### **DLCD ACKNOWLEDGMENT or DEADLINE TO APPEAL: July 24, 2007**

This amendment was submitted to DLCD for review 45 days prior to adoption. Pursuant to ORS 197.830 (2)(b) only persons who participated in the local government proceedings leading to adoption of the amendment are eligible to appeal this decision to the Land Use Board of Appeals (LUBA).

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

**\*NOTE: THE APPEAL DEADLINE IS BASED UPON THE DATE THE DECISION WAS MAILED BY LOCAL GOVERNMENT. A DECISION MAY HAVE BEEN MAILED TO YOU ON A DIFFERENT DATE THAN IT WAS MAILED TO DLCD. AS A RESULT YOUR APPEAL DEADLINE MAY BE EARLIER THAN THE ABOVE DATE SPECIFIED.**

Cc: Gloria Gardiner, DLCD Urban Planning Specialist  
Bob Cortright, DLCD Transportation & Growth Management Coordinator  
Darren Nichols, DLCD Community Services Division Manager  
Jon Jinings, DLCD Regional Representative  
Tamra Mabbott, Umatilla County

<paa> ya/



**FORM 2** Notice of Adoption

THIS FORM **MUST BE MAILED** TO DLCD  
**WITHIN 5 WORKING DAYS AFTER THE FINAL DECISION**  
PER ORS 197.610, OAR CHAPTER 660 - DIVISION 18

DATE  
STAMP  
DEPT OF  
JUL 05 2007  
LAND CONSERVATION  
AND DEVELOPMENT

Jurisdiction: Umatilla County Local file number: P-091; C-1110-07  
Date of Adoption: 6-21-07 Date Mailed: 7-3-07  
Date original Notice of Proposed Amendment was mailed to DLCD: 1-31-07

- Comprehensive Plan Text Amendment
- Land Use Regulation Amendment
- New Land Use Regulation
- Comprehensive Plan Map Amendment
- Zoning Map Amendment
- Other: Conditional Use Permit

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached".  
Exception to Goal 3 to allow a new roadway to  
be constructed on EFU zoned lands

Describe how the adopted amendment differs from the proposed amendment. If it is the same, write "SAME".  
If you did not give Notice for the Proposed Amendment, write "N/A".  
SAME

Plan Map Changed from: N/A to: \_\_\_\_\_  
Zone Map Changed from: N/A to: \_\_\_\_\_  
Location: Pendleton Regional Airport to Burdick Rd. Acres Involved: 3.9 miles/50 Acres  
Specify Density: Previous: N/A New: \_\_\_\_\_  
Applicable Statewide Planning Goals: Goal 3, 2, 1, 11, 5  
Was and Exception Adopted?  YES  NO

DLCD File No.: 002-07(15848)



Did the Department of Land Conservation and Development receive a Notice of Proposed Amendment.....

Forty-five (45) days prior to first evidentiary hearing?  Yes  No

If no, do the statewide planning goals apply?  Yes  No

If no, did Emergency Circumstances require immediate adoption?  Yes  No

Affected State or Federal Agencies, Local Governments or Special Districts:

City of Pendleton, OPOT, FHWA, Umatilla County Public  
works, Dept of Agriculture, DLCD

Local Contact: Tamra Mabbott Phone: (503) 278-6246 Extension: \_\_\_\_\_

Address: 216 S.E. 4<sup>th</sup> St. City: Pendleton

Zip Code + 4: 97801 - Email Address: tamra@co.umatilla.or.us

## ADOPTION SUBMITTAL REQUIREMENTS

This form **must be mailed** to DLCD **within 5 working days after the final decision**  
per ORS 197.610, OAR Chapter 660 - Division 18.

1. Send this Form and TWO (2) Copies of the Adopted Amendment to:

**ATTENTION: PLAN AMENDMENT SPECIALIST  
DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT  
635 CAPITOL STREET NE, SUITE 150  
SALEM, OREGON 97301-2540**

2. Submit **TWO (2) copies** the adopted material, if copies are bounded please submit **TWO (2) complete copies** of documents and maps.

3. Please Note: Adopted materials must be sent to DLCD not later than **FIVE (5) working days** following the date of the final decision on the amendment.

4. Submittal of this Notice of Adoption must include the text of the amendment plus adopted findings and supplementary information.

5. The deadline to appeal will not be extended if you submit this notice of adoption within five working days of the final decision. Appeals to LUBA may be filed within **TWENTY-ONE (21) days** of the date, the Notice of Adoption is sent to DLCD.

6. In addition to sending the Notice of Adoption to DLCD, you must notify persons who participated in the local hearing and requested notice of the final decision.

7. **Need More Copies?** You can copy this form on to 8-1/2x11 green paper only; or call the DLCD Office at (503) 373-0050; or Fax your request to: (503) 378-5518; or Email your request to [mara.ulloa@state.or.us](mailto:mara.ulloa@state.or.us) - ATTENTION: PLAN AMENDMENT SPECIALIST.



RECEIVED

JUN 06 2007

UMATILLA COUNTY  
RECORDS

THE BOARD OF COMMISSIONERS OF UMATILLA COUNTY

STATE OF OREGON

RECEIVED

JUN 22 2007

UMATILLA COUNTY  
PLANNING DEPARTMENT

In the Matter of Amending	)	
Comprehensive Plan to Include	)	ORDINANCE NO. 2007-08
Goals Exception for Barnhart	)	
Road and Airport Road	)	
Connection for City of	)	
Pendleton	)	

WHEREAS the Board of Commissioners has adopted a Comprehensive Plan for Umatilla County;

WHEREAS the City of Pendleton is proposing the construction of a new route between the Eastern Oregon Regional Airport and other properties located on Airport Road, to Barnhart Road and Interstate 84, to improve access to the properties;

WHEREAS the new connector road will be located on rural land, approval of the new road will require an exception to the applicable Statewide Planning Goals pursuant to ORS 197.732(1)(c) and OAR 660-12-0070;

WHEREAS the City of Pendleton submitted its Airport Connection to Barnhart Interchange Goal Exception, dated January 31, 2007, proposing Exceptions be taken to Statewide Planning Goals 3, 11 and 14;

WHEREAS the Umatilla County Planning Commission held a public hearing on May 17, 2007 to review the application and the proposed amendment to the Umatilla County Comprehensive Plan and recommended that the Board of Commissioners adopt the amendments;

WHEREAS the Board of Commissions held a public hearing on June 6, 2006, to consider the proposed amendments, and voted to approve the exceptions and the amendments to the comprehensive plan.

NOW, THEREFORE the Board of Commissioners of Umatilla County ordains that the Umatilla County Comprehensive Plan is amended to add the following as a part of Chapter XV, at page XV-6:

An exception is justified to Oregon State Land Use Goals 3 (Agricultural Lands), 11 (Public Facilities and Services), and 14 (Urbanization) for a new 3.9 mile long frontage road on the north side of I-84 between the



existing paved section of Stage Gulch Road and Barnhart Road near the Interstate 84 Interchange 202 that will cross approximately 3.5 miles of rural land (zoned EFU) outside of Pendleton's UGB. The road route is selected to provide direct, level Interstate access while minimizing impacts to existing land uses and that can be built within the available funding allocation. There are no sensitive environmental, economic, social or energy impacts associated with the proposed connector road.

The connection of Stage Gulch Road to Barnhart Road is needed as a secondary access to the Eastern Oregon Regional Airport. The EORA provides commercial air services to Northeast Oregon. The majority of the city's buildable industrial land is located around the airport. A second, at grade airport/interstate access is needed for emergency response to natural disasters, CSEPP and Homeland Security events. The existing Airport Road does not provide a safe and efficient route between US 30 and the airport. This road is located on a steep side slope that would not allow Pendleton to reduce the road grade or remove the sharp curves. During the winter months, the existing access can be shut down during and after winter storms. This effectively blocks all traffic to the EORA and industrial area. The other need is based upon the recent evaluation of the functionality and capacity of the Highway 30 and Airport Road intersection. The Airport Road and Highway 30 intersection will exceed capacity prior to build out of the industrial park.

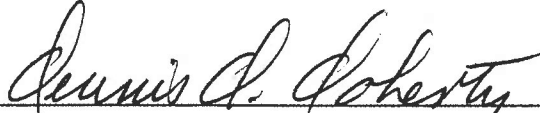
To minimize potential development on EFU lands along the proposed alignment, future access to the new road will be prohibited for non-farm access to the road except within the City's Urban Growth Boundary. An Interchange Area Management Plan has been adopted to protect the function of this new road as a limited access roadway, protect the operation of the interchange, and protect the farmland adjacent to this new road.

FURTHER by unanimous vote of those present, the Board of Commissioners deems this Ordinance necessary for the immediate preservation of public peace, health, and safety; therefore, it is adjudged and decreed that an emergency does exist in the case of this Ordinance and it shall be in full force and effect from and after its adoption.

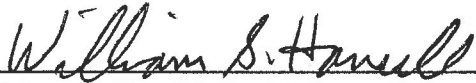


DATED this 6th day of June, 2007.


UMATILLA COUNTY BOARD OF COMMISSIONERS

  
\_\_\_\_\_

Dennis D. Doherty, Chair

  
\_\_\_\_\_

William S. Hansell, Commissioner

  
\_\_\_\_\_

W. Lawrence Givens, Commissioner

ATTEST:  
OFFICE OF COUNTY RECORDS

  
\_\_\_\_\_

Records Officer





**Final Findings of Fact  
Umatilla County Board of Commissioners**

**Comprehensive Plan Text Amendment #P-091 and  
Conditional Use Request #C-1110-07**

**Applicant:** City of Pendleton  
500 SW Dorion Avenue, Pendleton, OR 97801

**Owners:**

**Tax Lot 200 of Assessor's Map 2N 31 and Tax Lot 5800 of  
Assessor's Map 3N 31: A & B Pinkerton, Inc.  
5000 Airport Road, Pendleton, OR 97801**

**Tax Lot 300 of Assessor's Map 2N 31 and Tax Lot 300 of  
Assessor's Map 3N 31: Kenneth H. Coppinger  
1225 Second Avenue Hammond, Oregon 97121**

**Request:** To approve an exception to Statewide Planning Goal 3 to allow a new roadway across lands zoned Exclusive Farm Use and to approve a Conditional Use Request to allow for the construction of the new roadway.

**Background:** The application from the City of Pendleton showed the land use and legal justification to support the goal exception to allow the City of Pendleton to construct a new road between the Eastern Oregon Regional Airport (EORA) and Interstate-84. Construction of the new road will:

- Minimize impact to Exclusive Farm Use Zoned Lands
- Provide secondary, direct, at-grade Interstate access to the Regional Airport for regional emergency response
- Provide alternate access to the Regional Airport and Pendleton Industrial Park to address the declining level of service at existing Hwy 30/Airport Road intersection
- Provide a more level and safe roadway for transporting people, goods, and services between the Regional Airport and Pendleton Industrial Park and I-84
- Be completed within the available Congressional Funding Allocation

Justification to comply with applicable criteria is detailed in the document entitled Proposed Airport Connection to Barnhart Interchange, Goal Exception Land Use Application, dated January 31, 2007, filed by the City of Pendleton. A number of conditions were adopted by the Board of Commissioners to address concerns about protecting farmland and access along the preferred new road route. The preferred alternative described throughout the application

document and the record is Alternative 5, a connector road between Stage Gulch Road and Interstate 84, near Exit 202.

### **History of Project:**

In 2002, David Evans and Associates, Inc. (DEA) assisted the City of Pendleton and a Technical Advisory Committee (TAC) consisting of staff from the City, Umatilla County, Oregon Department of Transportation (ODOT), and Department of Land Conservation and Development (DLCD) in preparing a draft application. In addition, the Eastern Oregon Community Solutions Team (CST) assisted in providing support, information, and direction for the goal exception application. Based on the review of an early draft application, the CST requested a number of additions to improve the final application. This land use application was updated in 2003, based on more detailed research and analysis by DEA and economic development information provided by the Oregon Economic and Development Department.

In 2005, the City received notice of a Federal Transportation allocation to construct the proposed road. The city is currently in the process of working with consultants to design the road and designate a specific alignment. The City and ODOT are working on the required Environmental Assessment of the project. Additionally ODOT, City and County are working with Kittelson & Associates to develop an Interchange Area Management Plan (IAMP) for the intersection of Interstate Exit 202 and Barnhart Road. (See appendix J)<sup>1</sup>

Although a portion of the preferred new road route is outside the Pendleton Urban Growth Boundary (UGB), the city is submitting this goal exception and comprehensive plan amendment to the Umatilla County Planning Commission and Board of Commissioners for review and approval. As part of this application, the city proposes conditions that are intended to address potential concerns with protecting farm land and restricting urban development adjacent or near to the new road. Additionally, the city is willing to re-zone lands in the UGB to mitigate the net loss of farm land. This mitigation proposal is described in more detail later in this report.

## **1.0 Project Description**

A section of road is proposed to be constructed establishing a new route between the EORA and Interstate 84. This roadway would extend from Stage Gulch Road to Interstate 84 at Exit 202. A portion of the preferred route would be constructed on agricultural land, parallel to I-84 Interstate Right-of-Way and adjacent to land currently under wheat production. Except for the terminus on the east and west, the route road goes through Exclusive Farm Use (EFU) zoned agricultural land. The east terminus will be constructed on a parcel zoned Rural Light Industrial, owned by Woodpecker Truck and Equipment, Inc. Figure 2.1 provides a general location of Pendleton, Umatilla County, and Northeast Oregon.

At present, the EORA and Pendleton Industrial Park are accessed by Airport Road, a steep (6% Grade) and winding route from US Highway 30 and I-84 Interchange 207. Airport road is in poor condition and lacks defined travel lanes, curbs, gutter, and sidewalks. Driveways of existing businesses accessing Airport Road are not defined along the existing Airport route.

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<sup>1</sup> All references to Appendix in these findings refer to appendices of the Proposed Airport Connection to Barnhart Interchange, Goal Exception Land Use Application, dated January 31, 2007.



Over the years it has been difficult for the City of Pendleton to keep up maintenance on this road and keep Airport Road open during bad winter weather conditions. Some winters, Airport Road closes down completely during snow and ice storms. During the winter months it is difficult for general and commercial air services users and existing businesses to access this area.

For more than 20 years, the City of Pendleton has planned for the construction of a second road between the EORA and I-84 to improve access during the winter months and encourage additional Airport and Pendleton Industrial Park use. A proposed route, extending west from Stage Gulch Road at the west end of the EORA to Barnhart Road/I-84 Interchange 202, has been identified in the City of Pendleton Comprehensive Land Use Plan, EORA Master Plan, City and County Transportation System Plans (TSP). This new road would be constructed across a fairly level route that follows the ridge between the Airport and I-84.

In 2005, the United States Congress appropriated approximately \$5.5 million requiring a local match of about \$400,000 for the specific purpose of building a connector road between the Airport industrial area and Barnhart Road near I-84 Interchange 202. Alternative 2 was the original preferred alternative. Due to the available amount of funding and relative costs of construction, Alternative 5 is now the preferred alternative because it is the most feasible to construct. Both of these alternatives utilize nearly the same alignment across EFU zoned lands outside the City's UGB.

The proposed connector road between Stage Gulch Road and Barnhart Roads would provide a much needed second access to the Regional Airport and Pendleton Industrial Park. The new route would provide a secondary access for National Guard response to Homeland Security events in North Eastern Oregon and addresses the concerns regarding the current steepness of the access road that were raised during FEMA's site evaluation of the airport as a "Mobilization Center" for Eastern Oregon. The development of an at grade access also enables Pendleton and Umatilla County to increase general and commercial air service use of the regional Airport and recruit new industrial businesses to the area. This new road would provide a safe and more direct route that would allow Airport and Pendleton Industrial Park users to bypass the existing Airport Road and the congestion near I-84 Interchange 207. Trucks accessing Pendleton Industrial Park from the west would be able to bypass a steep grade of I-84 by using this new access road route. Current access from eastbound truck traffic requires trucks to come to a complete stop at Interchange 207, prior to negotiating the steeply sloped Airport Road. AASHTO studies of heavy truck traffic have determined that 20 mph is the maximum speed a truck can reach from a dead stop on a 6% slope. It is expected that this more level route would also be more likely to remain open during and after winter storm events. In addition, construction of this new road would improve the overall traffic circulation around the Airport and Pendleton Industrial Park. The current update of Pendleton's Transportation Plan identifies the declining functionality of the existing intersection at Airport Road and Hwy 30 and predicts that it will fall to an "F" level of service with the build-out of the industrial lands currently within the Urban Growth area at the airport.

As proposed, the Stage Gulch to Barnhart extension route (Alternative 5) would be constructed to Federal Highway (AASHTO) road design standards. The city and county have tentatively agreed to transfer ownership of the roadway and designation of ROW access control to the city

after it is constructed. Therefore, the City of Pendleton is taking the lead in requesting the goal exceptions to allow for a portion of this new road to be constructed outside the Pendleton UGB across agricultural land zoned for exclusive farm use.

Although the City of Pendleton is in the process of performing a Goal 9 analysis of the 20 year supply of industrial lands, this exception is based upon the current need to provide adequate transportation to the existing regional airport and industrial park. The existing transportation needs are twofold. First, there is the need to provide a more level and direct access from the Interstate to the Regional Airport and Industrial properties. Second, there is the need to develop an alternative to address declining functionality of the Highway 30-Airport Road intersection near Interchange 207. See Technical Memo 4 (Appendix J) by Marc Butorac, Kittelson & Associates, written as part of the analysis and development of the Interchange Area Management Plan.

Any expansion of the Urban Growth Boundary west of the EORA will be done independently of this proposed exception. **The City's sole purpose in proposing this new road is to improve access to properties within the UGB at the Regional Airport and Pendleton Industrial Park. The City of Pendleton will limit future access to this new road by prohibiting non-farm access to the road except within the City's Urban Growth Boundary and as required by the Interchange Access Management Plan (IAMP).**

In developing this goal exception application, multiple routes were identified and considered to improve the access to the EORA and Pendleton Industrial Park. The transportation routes considered included improving the existing substandard Airport Road and other alternatives connecting the Airport/Pendleton Industrial Park to I-84 (Figures 4.1 to 4.7). The seven alternatives considered in this goal exception application are shown below and fully detailed in Section 4. The alternatives include:

- Alternative 1      Improve Existing Airport Road
- Alternative 2      NW 'A' Avenue Extension (Frontage Road)
- Alternative 3      NW 'A' Avenue Extension (Direct Route)
- Alternative 4      Improve Stage Gulch Road
- Alternative 5      Modification of Alternative 2 (Stage Gulch/Barnhart Frontage Rd)
- Alternative 6      Construct a new I-84 Interchange & access road
- Alternative 7      Construct a route north & east of the airport to Highway 37

Alternative 5, a frontage road between Stage Gulch and Barnhart, is the preferred route selected by the City of Pendleton and Umatilla County. Alternative 5 is a modification of Alternative 2 that reflects the road alignment of an interstate connector road to the airport that can be constructed with the 2005 Congressional appropriation of \$5.5 million (with an additional \$0.4 million local match) while minimizing impacts to EFU zoned land. Alternative 5 has been prepared for both the existing and projected traffic volumes to the airport properties. The evaluation of Alternatives 1 through 3 was part of the original scope of work and was covered by the traffic analysis performed in 2001. Alternative 4, the improvement of Stage Gulch Road, was added in 2002 at the request of the CST. Alternatives 6 and 7 were identified during the City's current TSP update. Full traffic analysis was not performed of these alternatives.



In order to advance the future construction of the preferred alternative through the conceptual planning stage and into preliminary design and construction, the City of Pendleton must receive approval for exceptions from Statewide Planning Goals. Pendleton is required to secure exceptions to Statewide Planning Goal 3 (Agricultural Lands), Goal 11 (Public Facilities and Services), and Goal 14 (Urbanization) from Land Conservation and Development Commission (LCDC). A goal exception for the proposed roadway is a requirement of the Transportation Planning Rule (TPR [Oregon Administrative Rule Chapter 660 Division 12]) because a portion of the new road would traverse land zoned for EFU located outside of the Pendleton UGB. Section 3.0 (Goal Exception Requirements) provides more detailed information about the requirements in OAR 660-012-0070 governing goal exceptions. Compliance of the preferred alternative with the applicable Oregon Administrative Rules is detailed in Section 10 (Findings of Fact).

A section on the economic benefits of this new road to Pendleton, Umatilla County, and the region has been added based on the direction of the CST Directors. Although economic need is not one of the specific approval criteria for this goal exception, it is important for this application because this new road will enable Pendleton and Umatilla County to increase use of the EORA and help in recruiting new industrial businesses to Eastern Oregon and is the rationale accepted and approved for the Federal funding allocation to construct the road. A primary need for this new road is to assist in improving access to encourage increased use of the Airport and economic expansion of vacant and under developed industrial properties around the Airport. The economic benefits that this new road will provide are detailed in Section 9 (Economic Development Analysis).

In order for the City of Pendleton to meet compliance with the goal exception criteria, a number of conditions have been proposed to help Umatilla County protect the farmland in the vicinity of this new road after it has been constructed. In addition, an Interchange Area Management Plan (IAMP) for I-84 Interchange 202/Barnhart Road is currently being developed as part of this new road project. The IAMP will be adopted by Umatilla County and will serve as additional safeguard to protect farm ground and the existing roadway infrastructure.

### **Description of Project: Proposed New Transportation Access**

The City of Pendleton is proposing to construct a new road between the Airport and the Barnhart Road/I-84 Interchange to provide a much needed second access that is safe and convenient to both general and commercial air service users and industrial businesses. The much discussed and preferred route of the City of Pendleton would be to extend Stage Gulch Road west to connect with Barnhart Road near the I-84 (Exit 202) Interchange (Alternative 5). This route would allow for the construction of a fairly level access road for moving people, goods, and services between the Airport and Pendleton Industrial Park to I-84. In addition to providing an improved safe route, this new access road would allow for large eastbound trucks to avoid the steep grades of both I-84 and the existing Airport Road. The City of Pendleton and Umatilla County are willing to adopt measures to restrict access along this new road outside the Pendleton UGB to EFU uses. As proposed, this new road would become a city street after it was constructed.



The preferred road extension (Alternative 5) would require goal exceptions because a portion of this route crosses over EFU zoned land outside the Pendleton UGB. In considering the merits of the preferred route and conformance with state land use regulations, six other alternatives were also considered in this goal exception application. Alternative 1 would involve the improvement of the existing Airport Road within the City Limits of Pendleton and would not require a goal exception. Alternatives 2, 3, 6 & 7 would also require goal exceptions because portions of these routes would be built on EFU zoned land outside of Pendleton's UGB. Alternative 4 would involve the improvement of the existing Stage Gulch Road north and west of the EORA. Although a portion of Alternative 4 is also outside the UGB, it would not require goal exceptions because this alternative would be an improvement to an existing road. Alternate 4, however, requires additional right-of-way width and area for alignment of curves, resulting in removal of more land from agricultural use than Alternates 2, 5, 6 & 7.

## **2.0 Goal Exception Requirements**

The seven transportation alternatives detailed in Section 4 were identified and evaluated. All Alternatives, with the exception of 1 and 4, would each require exceptions to Statewide Planning Goals because a portion of each route would be constructed on EFU land outside the UGB. The goal exception for the preferred alternative requires approval by Umatilla County, which has land use jurisdiction of the EFU lands outside of the UGB.

Although Alternative 1 (Airport Road Improvement) would not require goal exceptions because the entire route is located within the Pendleton city limits and the UGB, it does not provide a second interstate access and is steeply sloped. Likewise, Alternative 4, Stage Gulch Road Improvement, would not require goal exception since Stage Gulch Road is an existing road and right-of way, it does not provide direct interstate access, is steeply sloped and impacts the second greatest amount of farm land of all the alternatives.

The Transportation Planning Rule, (TPR) in 660-012-0070, established the criteria for exceptions to transportation projects on rural lands. New transportation projects are not allowed except where a land use application can demonstrate compliance with OAR 660-012-0070. The construction of preferred Alternative 5 requires exceptions to the following goals:

- Goal 3: Agricultural Lands
- Goal 11: Public Facilities
- Goal 14: Urbanization

Justification for exceptions to Goals 3, 11 and 14 will be demonstrated in Section 7 below, Findings of Fact. Exceptions to Goals 3, 11 and 14 will be validated by demonstrating compliance with OAR 660-12-0070.

## **3.0 Land Use Analysis**

### **3.1 Existing Land Use and Zoning**

The county zoned EFU land that would be impacted by each of the transportation alternatives is shown on Figure 6.1. The Airport and neighboring uses include land with zoning designations

AA (Airport Activities), M-1 (Light Industrial), and EFU (Exclusive Farm Use) (City of Pendleton Ordinance Number 3251). Property located within the Airport boundary is zoned AA, lands to the south and west that include Pendleton Industrial Park are zoned M-1. There is also an approximately 100-acre area that is now included within the City's UGB (since April 2000). This area retains its EFU zoning designation, but will eventually be rezoned to M-1 like other nearby areas (Urban Fringe Land Use Study, Phase II; The Benkendorf Assoc. Corp.).

There are a total of 513 acres in the AA zone, of which 21.5 acres are currently leased and 10.4 acres are open for lease. Building coverage in this zone is 2.4 acres, or 103,673 square feet. The total acreage in the M-1 zone is 694 acres, of which the City of Pendleton owns 532 acres and 162 acres are privately owned. Of the 532 acres owned by the City, 44.6 acres are currently leased and the building coverage is 4.6 acres, or 201,247 square feet. Of the 162 acres that are privately owned, the building coverage is 6.5 acres, or 283,576 square feet.

The Airport's general vicinity supports a mix of residential and commercial uses; however, the City of Pendleton is actively converting the residential properties into more compatible industrial uses. Approximately 11.1 acres of industrial development occupies the approximately 532-acre Pendleton Industrial Park south of the Airport. The remaining residential areas (mostly low and medium residential uses) occur on land zoned M-1 and occur mainly to the south of the Airport. Outside of the Pendleton UGB, City-owned land is primarily zoned EFU.

Parcels near the I-84/Barnhart Road interchange are designated rural zones which allow for lower intensity uses. The zones include Rural Light-industrial (RLI) and Rural Tourist Commercial (RTC). There are several small businesses in the vicinity of the interchange. The largest is the Woodpecker Truck & Equipment, Inc., which sells and repairs semi-trucks. This interchange area is currently under study as a component of the IAMP work required for allocation of the Federal funding appropriation. The balance of the intersection is in the Exclusive Farm Use (EFU) zone.

The extension of NW 'A' Avenue (Alternatives 2 and 3) or the proposed connector road between Stage Gulch Road (Alternative 4) would impact County zoned EFU land. The amount of EFU land that would be taken out of agricultural production is shown in Table 3.1. In calculating the amount of EFU land removed from production, an initial assumption was made that either Alternative 2 or 3 would have a right-of-way width of 60 feet. The proposed acreages for Alternate 2 have been updated to reflect the requirements for allocation of the Federal funding appropriation and reflect the minimum area required for right-of-way width. An assumption was made that an additional 20 feet of new right-of-way would be needed to bring Stage Gulch Road up to County road design standards. EFU land impacts were calculated by multiplying the right-of-way width by the length of each road segment. Slope fill areas were included for those portions of the alignments that either crossed major drainages or involved elevated ramps (Alternate 6).

**Table 3.1: Impacts to County Zoned EFU Land**

Alternative	Total Length in Miles	City/UGB Length in Miles	County EFU Length in Miles	County EFU Impacts in Acres
1	1.8	1.8	n/a	n/a



2	4.8	1.3	3.5	50 to 60
3	4.1	1.2	2.9	90 to 100
4	8.1	1.1	7.0	60 to 75
5	3.9	0.4	3.5	50 to 60
6	2.6	1.4	1.2	20 to 35
7	9.3	5.3	4.0	25 to 40

### 3.2 Statewide Planning Goals

Statewide Planning Goals express the state's policies on land use and related topics. Most of the goals are accompanied by "guidelines," which are suggestions about how a goal may be applied. As noted in Goal 2: Land Use Planning, guidelines are not mandatory. Oregon's statewide goals are achieved through local comprehensive planning, which requires that each city and county to adopt a comprehensive plan and the zoning and land-division ordinances needed to put the plan into effect. The local comprehensive plans must be consistent with the statewide planning goals.

Alternatives 2, 3, 5, 6 & 7 would require an exception to Goal 3, which requires agricultural lands to be preserved and maintained for farm uses. These alternatives would also require exception to Goal 11, which protects rural areas by limiting the extension of public facilities from urbanized to rural areas, except where appropriate to serve the needs of rural areas, and Goal 14, which prohibits urban uses outside of an UGB. Alternative 1, the improvement of Airport Road, would not require goal exceptions because the entire length is within the City limits and UGB. Likewise, Alternative 4, the improvement of Stage Gulch Road, would not require goal exceptions because it is an existing road. ORS 215.283 (L) allows for the reconstruction or modification of public roads on EFU land that do not to include the addition of travel lanes or the displacement of buildings. Improving Stage Gulch Road to AASHTO road design standards would not include additional travel lanes or displace any buildings. However, as shown in Table 6.1, and described in Section 4, Alternatives 4 & 7 would impact an additional 60 to 75 acres EFU acres of property.

### 3.3 Umatilla County Comprehensive Plan

The Umatilla County Comprehensive Plan (Umatilla County Planning Department) was acknowledged in 1983 and revised in minor sections since then. The Comprehensive Plan identifies the portion of the project area between the Pendleton UGB and Barnhart Road as EFU (as established in ORS 215.203). It has a special designation as a part of the North/South County Agricultural Region. Generally, this region is designated for commercial farming and agriculture, and requires a minimum parcel size of 160 acres. Any Alternative selected (with the exception of Alternate 1) would reduce the amount of available farmland by the amounts shown in Table 3.1 above. If a goal exception were approved, the comprehensive plan would need to be modified to reflect the exemption for a new road on EFU zoned land.

### 3.4 Umatilla County and City of Pendleton Transportation System Plans

The Umatilla County and City of Pendleton (Kittelson & Associates, Inc., 1996) TSPs describe current and future conditions and needs for the County transportation system. The proposed extension of NW 'A' Avenue, between the EORA and the Barnhart Road/I-84 Interchange, is identified as a future transportation project in both the City of Pendleton and Umatilla County TSPs. Although this new road is identified as a project by both the city and county, it is not yet



identified in the Capital Improvements Program for either TSP. Upon approval of the exception, the City and County TSPs will be amended to include the new extension as a part of the CIPs.

### **3.5 Future Conditions**

The “Pendleton Urban Fringe Land Use Study” (Benkendorf Associates Corporation, 1999) included a buildable lands inventory and calculation of the total land needs for projected population and employment growth within the next twenty years. The Study determined that there will be significant shortage of industrial land within the next 20 years and that much of the existing vacant industrial land is not really available because of steep slopes, it is located within the flood plain, or has other physical constraints. For this reason, and also because four large parcels near the Airport are available on a lease-only basis, the study recommended modifying the UGB to make more buildable industrial land available. One of these sites is the area zoned EFU near the Airport. Pendleton has undertaken an analysis to assure an adequate 20 year supply of industrial lands. Any expansion of the Urban Growth Boundary west of the EORA will be done independently of this proposed exception.

According to the Pendleton TSP, which was prepared in 1996, the total employment in the City of Pendleton was forecast to increase from 6,971 in the year 1995 to 9,445 in the year 2015, representing an average annual growth rate of 1.53 percent (See Table 4-3 on Page 4-7 of the TSP). This is an average for all types of employment (e.g., industrial, retail, and service) and for the entire City. However, the TSP includes data that is more specific to the area around the Airport, which likely has a higher percentage of industrial jobs than the City as a whole.

The travel forecasts in the TSP are based on a travel demand forecasting model, in which population and employment data are desegregated into Transportation Analysis Zones (TAZs). A map of the TAZs used in the TSP is included in Appendix D of the transportation analysis report (DEA 2002) prepared in support of this goal exception report (Appendix A). As shown on the TAZ map, four of the TAZs, Numbers 15, 16, 17, and 18, encompass the industrial lands in the AA and M-1 zones in the vicinity of the Airport. According to the data in Tables E1 and E2 of the City’s TSP, employment in these zones is forecast to increase at an average annual growth rate of 3.88 percent from the years 1995 to 2015.

Because the forecast growth rate of 3.88 percent is more site-specific to the study area than the 1.53 percent growth rate for the entire City, the growth rate of 3.88 percent per year was used for industrial development in this study. As described earlier, currently the AA and M-1 zones are developed with 588, 496 sq. ft. of industrial development. To estimate the year 2021 industrial development, the existing development was increased at a rate of 3.88 percent per year for 20 years, to arrive at an estimate of 1,260,034 sq. ft. of industrial development. This is a “Base Case” or “No Build” forecast, i.e., a forecast for the scenario in which the NW ‘A’ Avenue extension is not constructed. As described in Section 3.0 (Alternatives) of this report, Alternative 1 (improving the existing Airport Road) can be considered a “No Build” alternative. Therefore, the estimate of 1,260,034 square feet of industrial development in the year 2021 was used in the analysis of Alternative 1.

A higher estimate of industrial development was made for the two “Build” alternatives. Alternative 2 would consist of constructing an I-84 frontage road between Interchange 202 and

'A' Avenue, and Alternative 3 would consist of constructing a direct route between Interchange 202 and 'A' Avenue. Construction of either alternative is expected to result in an increase in industrial development by attracting development that would not locate in the area if the only access were Airport Road. For this study, an average annual growth rate of 5.00 percent for industrial development was used for the two "Build" alternatives in which the NW Avenue 'A' extension is constructed. Therefore, the estimate of 1,561,455 sq. ft. of industrial development in the year 2021 was used in the analysis of Alternatives 2 and 3. Although the improvement of the existing Stage Gulch Road would not provide a direct link between the EORA and I-84, it was determined to be similar to Alternatives 2 and 3 in attracting industrial development.

## 4.0 Transportation Analysis

I-84/Barnhart Road Interchange Area Management Plan (IAMP) – Technical Memorandum #4 was prepared by Kittelson & Associates, Inc. in November 2006 as a series of technical memorandums being prepared for the I-84/Barnhart Road IAMP. This memorandum is attached as Appendix J.

The memorandum documents the existing and future traffic conditions as well as possible land use scenarios in the vicinity of the I-84 Interchange 202 and the Airport industrial areas as they relate to I-84 Interchange 207. Based on these land use scenarios, an assessment of future year 2025 "No-Build" (without a connector roadway) and "Build" (with a connector roadway) forecasts are provided for the connecting the airport industrial areas to Barnhart Road near I-84 Interchange 202. The remainder of the memorandum summarizes the land use, regional traffic growth, and traffic reassignment assumptions. As well as the forecasted year 2025 traffic operation.

This section of the goal exception land use application will summarize the more detailed information found in the technical memorandum.

### 4.1 Existing Conditions

The study area is bordered on the north by the airport, on the south by I-84, on the east by Airport Road and I-84 Interchange 207, and on the west by I-84 Interchange 202. Almost all of the traffic accesses the Airport via Westgate Avenue (Hwy 30) and I-84 Interchange 207. Some traffic accesses the Airport via Stage Gulch Road and Snyder Road. These are County gravel roads and do not provide direct access from the interstate. Airport Road has an average grade of 6%, which is an issue for heavy truck traffic. AASHTO has identified that truck traffic carrying a full load can only manage about 20 mph when beginning from a dead stop and climbing a 6% grade. This, along with inclement weather, makes Airport Road unattractive for light industrial development in the Airport industrial area.

The attributes of the existing street network within the study area are shown in Table 4.1:

**Table 4.1: Street Characteristics**

Street	Classification	Lanes	Width	Speed	Curbs	Sidewalks	Bikeways	On-Street Parking
I-84	Interstate Highway	4	Divided Highway	65 mph	None	None	8-foot Shoulder	None



Westgate Avenue (Hwy 30)	Major Arterial	2	32 feet	40 mph	None	None	4-foot Shoulder	None
Airport Road	Minor Arterial	2	34 feet	35 mph	None	None	None	None
NW A Avenue	Minor Arterial	2	28 feet	30 mph	None	None	None	None
Barnhart Road	Local Road	2	24 feet	None Posted	None	None	None	None

## 4.2 Year 2025 Future Year Conditions

Year 2025 “No-Build” and “Build” traffic assessments were completed as part of the I-84 Interchange 202 IAMP. These assessments are described below.

### 4.2.1 Year 2025 “No-Build” Traffic Assessment

Year 2025 “No-Build” (without the connector road) traffic volume forecasts for intersection turning movements and street segments were developed in order to analyze the effects of traffic growth on I-84 Interchange 202 and the surrounding transportation system that serve adjacent urban and rural land uses. For this assessment, a year 2025 “No-Build” scenario was developed based on the currently adopted Umatilla County and City of Pendleton comprehensive plans.

Year 2025 “No-Build” Scenario was developed considering the following three types of traffic growth:

- Future traffic growth related to development and redevelopment of the Umatilla County rural light industrial and rural tourist commercial exception land in the vicinity of I-84 Interchange 202;
- Future traffic growth related to the development and redevelopment of the land located currently within the Pendleton UGB in the immediate vicinity of the Airport; and
- Future traffic related to regional growth focusing on the increased use of Hwy 30 (Westgate Avenue) and I-84 corridors for intercity and interstate travel.

The specific assumptions used in each of these traffic growth components are summarized in Appendix J.

Future year 2025 “No-Build” weekday am and pm peak hour traffic volumes were determined by increasing the traffic on Highway 30 (Westgate Avenue) by 2.84% per year and adding full build-out trip generation estimates for I-84 Interchange 202 and the Airport industrial areas to the existing 2006 traffic volumes. The Airport Road / I-84 Interchange 207 intersection fails to meet operational standards during the weekday am and pm peak hour because of the high southbound left-turn demand created by build-out of the remaining industrial zoned properties within the Airport industrial area existing UGB. This level of traffic would likely require signalization of the Airport Road / Highway 30 (Westgate Avenue) and the development of either dual southbound left-turn lanes and the widening of the highway to five lanes or possible new secondary connection from the area into downtown Pendleton. *These mitigation needs are based on 1,582,000 square-feet of new industrial development within the Airport industrial area. This*

*development level is based on complete build-out and a 40% coverage rate that may or may not be realized by year 2025.*

#### **4.2.2 Year 2025 “Build” Traffic Assessment**

Three year 2025 “Build” traffic volume forecasts were developed in order to provide a better understanding of the operating conditions under the following three land use scenarios that may likely occur over:

- Scenario 1: This scenario is identical to the “No-Build” forecast as it relates to development and growth assumptions; however, it assumes that the I-84 Interchange 202 and Airport industrial area connector road is in place. As a result of the connection, it was assumed that 20% of the traffic created by new development with the Airport industrial area would utilize the new connector road to gain access to I-84 to travel to/from the west of Pendleton. In addition, it was assumed that 50% of the traffic currently traveling to/from the west via Airport Road would be re-routed to the connector roadway.
- Scenario 2: This scenario builds on Land Use Scenario 1 and includes 330 acres of future industrial development projected by the City as a result of a UGB expansion around the existing Airport industrial area.
- Scenario 3: This scenario includes all the land use assumptions in the prior two scenarios and includes the potential designation of 34-acres of isolated EFU zoned land that may be created by the connector road in the area of I-84 Interchange 202. This would be the maximum isolation of EFU zoned land based on the alternatives studied under the IAMP.

The specific assumptions used in each of these traffic growth components are summarized in Appendix J.

Land Use Scenario 1: All study intersections are expected to operate acceptably with the proposed connector roadway in place, except for the I-84 Interchange 202 EB terminal during the weekday am peak hour and the Airport Road / I-84 Interchange 207 intersection during both the weekday am and pm peak hours. These identified operational deficiencies, and the possible mitigation, are described below.

*I-84 Interchange 202 EB Terminal fails to meet operation standards during the weekday am peak hour due to the relatively high eastbound left-turn demand created by the build-out of the interchange and Airport industrial area. This deficiency could be effectively mitigated through the installation of a traffic signal at the I-84 Interchange 202 EB terminal. This mitigation need is based on 330,000 square-feet of new industrial development within the I-84 Interchange 202 rural industrial area and 1,582,000 square-feet of new industrial development within the Airport industrial area. This development level is based on complete build-out and a 40% coverage rate that may or may not be realized by year 2025.*



*Airport Road / Hwy 30 (Westgate Avenue) Intersection* fails to meet operation standards during weekday am and pm peak hour because of the high southbound left-turn demand created by build-out of the remaining industrial zoned properties within the Airport industrial area's current UGB. This level of traffic, although less than the Year 2025 "No-Build" scenario, would likely require signalization of the intersection and the development of either dual southbound left-turn lanes and the widening of the highway to 5 lanes or possibly a new secondary connection from the area to downtown Pendleton. *These mitigation needs are based on 1,582,000 square-feet of new industrial development within the Airport industrial area. This development level is based on complete build-out and a 40% coverage rate that may or may not be realized by year 2025.*

Land Use Scenario 2: All study intersections are expected to operate acceptably with the proposed connector roadway in-place, except for Clark Lane / Barnhart Road intersection during the weekday pm peak hour, the I-84 Interchange 202 EB and WB terminals and Airport Road / Hwy 30 (Westgate Avenue) and Old Airport Road / Hwy 30 (Westgate Avenue) intersections during the weekday am and pm peak hours. These identified operational deficiencies, and possible mitigation solutions, are described below.

*Clark Lane / Barnhart Road Intersection* fails to meet operation standards during the weekday pm peak hour due to the relatively high through volume on the connector road. This operation deficiency could be effectively mitigated through either the installation of a traffic signal at the Clark Lane / Barnhart Road intersection or through development of additional access points to the industrial properties located immediately north of the interchange. *This mitigation need is based on 330,000 square-feet of new industrial development within the I-84 Interchange 202 industrial area and 5,264,000 square-feet of new industrial development within the Airport industrial area. This development level is based on complete build-out and a 40 coverage rate that may or may not be realized by year 2025.*

*I-84 Interchange 202 EB Terminal* fails to meet operation standards during the weekday am and pm peak hours due to the increased traffic volumes on the connector road created by the build-out of the interchange and Airport industrial area. This operational deficiency could be effectively mitigated through the installation of a traffic signal at the I-84 Interchange 202 EB terminal. *This mitigation need is based on 330,000 square-feet of new industrial development within the I-84 Interchange 202 rural industrial area and 5,264,000 square-feet of new industrial development within the Airport industrial area. This development level is based on complete build-out and a 40% coverage rate that may or may not be realized by year 2025.*

*I-84 Interchange 202 WB Terminal* fails to meet operation standards during the weekday am and pm peak hours due to the increased traffic volumes on the connector road created by the build-out of the interchange and Airport industrial area. This operational deficiency could be effectively mitigated through the installation of a traffic signal at the I-84 Interchange 202 WB terminal. *This mitigation need is based on 330,000 square-feet of new industrial development within the I-84 Interchange 202 rural industrial area and 5,264,000 square-feet of new industrial development within the Airport industrial area. This development level is based on complete build-out and a 40% coverage rate that may or may not be realized by year 2025.*

*Airport Road / Hwy 30 (Westgate Avenue) Intersection fails to meet operation standards during weekday am and pm peak hour because of the high southbound left-turn demand created by build-out of the remaining industrial zoned properties within the Airport industrial area's expanded UGB. This increased level of traffic would likely require signalization of the intersection and the development of either dual southbound left-turn lanes and the widening of the highway to 5 lanes and a new secondary connection from the area to downtown Pendleton. These mitigation needs are based on 5,264,000 square-feet of new industrial development within the Airport industrial area. This development level is based on complete build-out and a 40% coverage rate that may or may not be realized by year 2025.*

*Old Airport Road / Hwy 30 (Westgate Avenue) Intersection fails to meet operational standards during weekday am and pm peak hours because of the high volume of traffic on Hwy 30 (Westgate Avenue). Mitigation of this operational deficiency is not required due to the relatively low side street volumes present on Old Airport Road.*

Land Use Scenario 3: All study intersections are expected to operate acceptably with the proposed connector roadway in-place, except for Clark Lane / Barnhart Road intersection during the weekday pm peak hour, the I-84 Interchange 202 EB and WB terminals and Airport Road / Hwy 30 (Westgate Avenue) and Old Airport Road / Hwy 30 (Westgate Avenue) intersections during the weekday am and pm peak hours. These identified operational deficiencies are similar to those identified under Land Use Scenario 2 and do not warrant any additional mitigation beyond that previously identified.

#### **4.2.3 Summary of Year 2025 Future Year Conditions**

Year 2025 "No-Build" and "Build" forecasts and analysis resulted in the following findings:

- Reasonable worst-case development of existing properties that are likely to redevelop and vacant properties within the I-84 Interchange 202 and Airport industrial areas will result in approximately 2,100,000 square-feet of industrial space and several service related uses per the adopted Umatilla County and City of Pendleton comprehensive plans.
- All study area intersections operate acceptably under the year 2025 "No-Build" forecast with the exception of the Airport Road / Hwy 30 (Westgate Avenue) intersection. This intersection would likely require signalization and the development of either dual southbound left-turn lanes and the widening of the highway to 5 lanes or possible new secondary connection from the area into downtown Pendleton.
- Three year 2025 "Build" (with a connector road in place) land use scenarios were considered in this evaluation, including:
  - Scenario 1: This scenario is identical to the year 2025 "No-Build" forecast and assumes the development of approximately 2,100,000 square-feet of industrial space and several service related uses in the I-84 Interchange 202 and Airport industrial areas per the adopted Umatilla County and City of Pendleton comprehensive plans.



- Scenario 2: This scenario builds on Land Use Scenario 1 and includes approximately 3,682,000 square-feet of additional industrial development as a result of UGB expansion around the existing Airport industrial area.
- Scenario 3: This scenario includes all the land use assumptions associated with Land Use Scenarios 1 and 2 and also includes the potential designation of 34 acres of isolated EFU land created by the most northerly alignment of the connector road in the vicinity of I-84 Interchange 202. This additional industrial land would result in approximately 173,000 square-feet of industrial space.

Land Use Scenario 2 and 3 would require additional land use actions beyond the purview of the IAMP. However, these scenarios have been provided for a better understanding of the implications of a connector road and those roadways and accesses within the IAMP study area.

- All three year 2025 total traffic forecasts indicate a two-lane connector will be sufficient enough to accommodate the estimated 4,000 to 10,000 daily trips. It should be noted that the roadway will likely require a median (turn lane) within the I-84 Interchange 202 and Airport industrial areas to facilitate left-turn movements; however, no turn lanes will be necessary along the section accessing EFU lands.
- A connector road (secondary access) to the Airport industrial area via the interstate will provide relief to the forecasted failure of the Airport Road / Hwy 30 (Westgate Avenue) intersection under the year 2025 “Build” land use scenarios.

### **4.3 Accident History**

A review of accident data in the study area was conducted in 2002 to determine whether historic accident patterns indicate any safety problems in the vicinity. ODOT provided accident data for I-84 Interchanges 202 and 207 and for Airport Road between Hwy 30 (Westgate Avenue) and the Airport for the period of January 1998 to 2000. During the three-year study period, there were a total of six accidents.

At I-84 Interchange 202 there were four accidents, which all occurred during icy or snowy conditions. The cause for all four accidents was listed as driving too fast.

At I-84 Interchange 207 there was one accident, which also occurred during icy or snowy conditions. The cause of this accident was also listed as driving too fast.

On Airport Road there was one accident where the driver ran into a ditch during dry pavement conditions.

These six accidents during the three-year period do not indicate that there is a specific safety deficiency in the study area. Based on this study information and discussions with City of Pendleton Police Chief in regards to more recent accident and safety concerns, no additional study was warranted.

#### **4.4 Committed or Planned Roadway Improvements**

In 2005, the United States Congress appropriated approximately \$5.5 million requiring a local match of about \$400,000 for the specific purpose of building a connector road between the Airport industrial area and Barnhart Road near I-84 Interchange 202. Alternative 2 was the original preferred alternative. Due to the available amount of funding and relative costs of construction, Alternative 5 is now the preferred alternative because it is the most feasible to construct. Both of these alternatives utilize nearly the same alignment across EFU zoned lands outside the City's UGB.

Current City of Pendleton TSP and Airport Master Plan have identified a connector road from I-84 Interchange 202 to the Airport industrial area as desirable. The TSP has also identified other improvements in the study area. These include a traffic signal at Airport Road / Hwy 30 (Westgate Avenue) intersection and upgrades to pedestrian facilities along Airport Road.

Concurrent with this application, the City is in the process of updating their TSP. In addition to the items above, the updated TSP will be acknowledging the need for an additional connector road from the Airport industrial area to downtown Pendleton via Old Airport Road. A 60-foot ROW is already in place, but a portion of this roadway will be outside the existing UGB and cross EFU zoned land; thus, may require an additional Goal 3 exception application and approval.

#### **4.5 Summary of Engineering Factors**

Each of the seven alternatives was considered using engineering factors based on:

- Design requirements meeting Federal Highway Administration and City of Pendleton requirements. Both entities reference the American Association of State Highway Transportation Officials (AASHTO) highway design standards.
- ROW consisting of a minimum of 80-feet to accommodate two 11-foot travel lanes, two 6-foot shoulders, future center median (left turn), future dedicated right turn lane, and future utilities.
- Grade consideration of less than 4% for an arterial connector road. A 6% grade is only considered for connectivity to existing roadways.
- Initial capacity for 400 to 1500 vehicles per day. This establishes the minimum roadway cross-section for AASHTO design standards to consist of 12-inches of base material with 6-inches of pavement.
- Design speed for posting rural highway arterial speeds at 55 miles per hour. This requires designing the roadway for a minimum 65 mph speed consideration. Vertical and horizontal curves, along with sight distance considerations for starting, stopping, and turning movements have to be addressed at the minimum design speed consideration.

##### **4.5.1 Alternative 1 – Improve Airport Road (Figure 4.1)**

This alternative would consist of improvements to the existing Airport Road and NW A Avenue, beginning at the junction with Hwy 30 (Westgate) and ending at NW 56<sup>th</sup> Drive. This route is



approximately 1.8 miles long and would have no effect on EFU zoned lands. The improvements associated with this alternative would include repaving and widening the road surface to AASHTO standards, and adding curbs, gutters, and sidewalks. Because Airport Road is constructed up a steep side slope, it would be very difficult and costly to reduce the sections of steep grade measured at 6.3%, 6.5%, and 5.9% along sections of Airport Road.

Alternative 1 is generally intended to increase safety for motor vehicles, bicycles, and pedestrians. This alternative does not address a secondary, flat access to the overall Airport industrial area.

#### **4.5.2 Alternative 2 – Extend NW A Avenue via Frontage Road (Figure 4.2)**

This alternative would consist of constructing a frontage road on the north side of I-84 between NW A Avenue near NW 56<sup>th</sup> Drive and Barnhart Road near the I-84 Interchange 202. If constructed, this new roadway would be a City-owned and access controlled, two-lane arterial road, approximately 4.8 miles long and constructed to AASHTO standards. About 3.5 miles of this route would be on EFU zoned land located west of the City's UGB. One major drainage crossing would be necessary within the EFU zoned land. With a road ROW of 80-feet (33.5-acres) and cut/fill slopes, a total of about 50- to 60-acres of EFU zoned land would be directly affected. To minimize impacts to farm operations, a portion of this route would be located adjacent to I-84.

This connector road would allow vehicles to bypass the 6% downgrade on I-84 and the 6% upgrade on Airport Road for traffic traveling to the Airport from areas west of I-84 Interchange 202. This connector road would reduce traffic on Airport Road and I-84 Interchange 207 and increase traffic on I-84 Interchange 202.

#### **4.5.3 Alternative 3 - Extend NW A Avenue via Direct Route (Figure 4.3)**

This alternative would consist of constructing a new road from NW A Avenue near NW 56<sup>th</sup> Drive directly to Barnhart Road near the I-84 Interchange 202. If constructed, this new roadway would be a City-owned and access controlled, two-lane arterial, approximately 4.1 miles in length and constructed to AASHTO standards. About 2.9 miles of this route would be on EFU zoned land located west of the City's UGB. Five major drainage crossings would be necessary within the EFU zoned land. With a road ROW of 80-feet (28.1-acres) and cut/fill slopes, about 90- to 100-acres of EFU zoned land would be directly affected. Approximately 2.0 miles of this alternative lies on the same alignment as Alternative 2 located at the eastern end of the proposed new alignment.

**Similar to Alternative 2, this connector road would bypass the 6% downgrade on I-84 and the 6% upgrade on Airport Road for traffic traveling to the Airport from areas west of I-84 Interchange 202. This connector road would reduce traffic on Airport Road and I-84 Interchange 207 and increase traffic on I-84 Interchange 202.**

#### **4.5.4 Alternative 4 - Improve Stage Gulch Road (Figure 4.4)**

Based on the request of the CST, the improvement of the existing Stage Gulch Road from the Airport near NW 56<sup>th</sup> Drive to the Barnhart Road near the I-84 Interchange 202 was added as an alternative to this goal exception application. About 1.1 miles of Stage Gulch Road is paved and 7.0 miles is a gravel road used by area wheat farmers to access their fields. About 6.9 miles of this route would be on EFU zoned land located west and north of the City's UGB. This route would require expanding the County road ROW from 50-feet to 80-feet within the EFU zoned land. With increasing the road ROW from 50-feet to 80-feet (24.9-acres), cut/fill slopes, and realignment of sections with curves at or greater than 90 degrees, about 60- to 75-acres of EFU zoned land would be directly affected. Although this road does provide an existing connection between the Airport and the I-84 Interchange, it would require significant improvements for it to provide access for large freight trucks. Most of the Barnhart Road portion of this alignment is greater than 6% slope and is not conducive to truck traffic. Overall, this route is just over 8.0 miles in length and requires a significant amount of out of direction travel for vehicles to travel between the EORA industrial area and I-84.

For purposes of this goal exception land use application analysis, the assumption was made that Stage Gulch Road, between NW 'A' Avenue near NW 56<sup>th</sup> Drive, and Barnhart Road, near the I-84 Interchange 202, would be improved to City arterial road design standards (AASHTO). The required improvement would include widening and paving this entire road route. A portion of this route, at the intersection of Barnhart and Stage Gulch Road, would need to be completely reconstructed to allow for truck turning movements and travel along this corridor. This connector road would also provide the same downgrade and upgrade issues presented by the 6% downgrade on I-84 and the 6% upgrade on Airport Road for traffic traveling to the Airport from areas west of I-84 Interchange 202.

#### **4.5.5 Alternative 5 – Extend Stage Gulch Road via Frontage Road (Figure 4.5)**

This alternative would consist of constructing a frontage road on the north side of I-84 between the existing paved section of Stage Gulch Road and Barnhart Road near the I-84 Interchange 202. This alternative has a similar alignment to Alternative 2 effecting EFU zoned land. If constructed, this new roadway would be a City-owned and access controlled, two-lane arterial road, approximately 3.9 miles long and be constructed to AASHTO standards. Just over 3.5 miles of this route would be on EFU zoned land located west of the City's UGB. One major drainage crossing would be necessary within the EFU zoned land. With a road ROW of 80-feet (34.2-acres) and cut/fill slopes, a total of about 50- to 60-acres of EFU zoned land would be directly affected. In comparison to the alignment for Alternative 2, the additional affected EFU zoned land is about 0.7-acre for this alignment. A portion of this route would be located adjacent to I-84 to minimize impacts to farm operations and Exclusive Farm Use (EFU) zoned land.

This connector road would allow vehicles to bypass the 6% downgrade on I-84 and the 6% upgrade on Airport Road for traffic traveling to the Airport from areas west of Interchange 202 on I-84. This connector road would reduce traffic on Airport Road and Interchange 207 and increase traffic on I-84 Interchange 202.

#### **4.5.6 Alternative 6 – New Interchange (Figure 4.6)**



This alternative would consist of constructing a new road from NW A Avenue near NW 56<sup>th</sup> Drive to I-84 and include a new diamond interchange between the I-84 Interchange 202 and 207. This alternative is similar to Alternative 5 and Alternative 2, but eliminates the frontage road by providing a diamond interchange where the alignment meets I-84. If constructed, the new roadway would be a City-owned and access controlled, two-lane arterial road, approximately 2.6 miles long and be constructed to AASHTO standards to the diamond interchange. Just over 1.2 miles of this route would be on EFU zoned land located west of the City's UGB. With a road ROW of 80-feet (11.6-acres), cut/fill slopes, and the diamond interchange configuration, a total of about 20- to 35-acres of EFU zoned land would be directly affected. The new diamond interchange would include an overpass structure and approximately 1.4 miles of ramps. They would be an ODOT-owned and controlled improvement. A recently completely ODOT diamond interchange in the ODOT Region 5 near Ontario, Oregon, cost about \$20 million to complete.

**This alternative does not meet Federal Highway and ODOT spacing requirements for interstate interchanges. In accordance with the Oregon Highway Plan, the minimum interchange spacing for urban areas is 3 miles and for rural areas is 6 miles. For this alternative, it would be classified as a rural interchange application.**

#### **4.5.7 Alternative 7 – Improve Stage Gulch Road and Snyder Road to Hwy 37 (Figure 4.7)**

This alternative would consist of widening and improving Stage Gulch Road and Snyder Road to the north and east of the Airport industrial park from NW 56<sup>th</sup> Drive to Hwy 37 (Northgate). This alignment would allow vehicles to utilize Hwy 37 (Northgate) and Hwy 30 (Westgate) to I-84 Interchange 207. If constructed, this new roadway would be a City-owned and access controlled, two-lane arterial road, approximately 5.1 miles long and constructed to AASHTO standards. About 4.0 miles of this route would be on EFU zoned land located west and north of the City's UGB. This route would require expanding the County road ROW from 50-feet to 80-feet within the EFU zoned land. With increasing the road ROW from 50-feet to 80-feet (14.4-acres), cut/fill slopes, and realignment of sections with curves at or greater than 90 degrees, about 25- to 40-acres of EFU zoned land would be directly affected. Most of this route is located in County EFU and is a gravel road used by area wheat farmers to access their fields.

It would require significant improvements and additional ROW effecting EFU zoned land for it to provide access for large freight trucks. The overall route is slightly more than 9.3 miles in length and requires a significant amount of out of direction travel for vehicles to travel between the industrial area and I-84 Interchange 207.

#### **4.6 Transportation Improvement Costs**

For the purpose of evaluating the seven transportation alternatives, cost estimates have been calculated. In calculating these costs, assumptions were made regarding the expected cost of reconstructing existing roads and construction of new ones.

For reconstructing Airport Road and NW A Avenue to NW 56<sup>th</sup> Drive, this work would require several items to be assessed. The existing base material on both Airport Road and NW A Avenue needs to be assessed. The pavement on Airport Road needs to be milled and overlaid.

Assuming the base will be insufficient, the overall cost of reconstructing this alternative is similar to the cost for constructing a new road at \$1,500,000 per mile.

For several of the alternatives, the first 1.1 miles of Stage Gulch Road from NW 56<sup>th</sup> Drive would require a new alignment; thus, is considered as a new road. It is assumed that the cost for constructing a new road which requires ROW, design, and construction is \$1,500,000 mile. This assumes a fairly flat at-grade road. For roads crossing drainages, additional fill material for extended slopes, ROW purchase, and culvert consideration for drainage are a factor. For comparison purposes, a factor of 1.3 times the cost of a new road was applied for each drainage crossing to account for the additional expense. For alternatives using existing ROW and a presently gravel roads, a factor of 0.9 was applied to account for a decrease in the expense of construction. It was also assumed that the cost of a new diamond interchange was about \$20 million.

The cost estimates for the seven alternatives are shown in Table 4.2.

**Table 4.2: Summary of Transportation Cost Estimates**

Alternative	Total Mileage	Total Cost
1	1.8	\$ 2,700,000
2	4.8	\$ 7,200,000
3	4.1	\$ 7,990,000
4	8.1	\$11,100,000
5	3.9	\$ 5,850,000
6	2.6	\$23,900,000
7	9.3	\$ 7,050,000

## 5.0 Economic Development Analysis

The City of Pendleton has identified the need to improve transportation access to the EORA and Pendleton Industrial Park to increase economic development opportunities at the Airport and vacant industrial lands. Based on the direction of the CST, research has been conducted to detail the importance of access to encourage increased economic development activity. This has included an evaluation of other commercial airports in the northwest, research by both the Oregon Economic and Community Development Department and the consultant team, and information provided by the City of Pendleton.

The current access to the EORA and Pendleton Industrial Park is from Airport Road. This road follows a steep and winding route from a connection to US Highway 30 up to the Airport. The City of Pendleton has been notified by potential industrial businesses that this route is not adequate for transporting industrial products between I-84 and Pendleton Industrial Park. See the letters from businesses regarding access (Appendix G). In addition, businesses have expressed concern that this one existing road does not allow for access during storm events because the steep grade is difficult to keep open during certain times in the winter months. Letters from business regarding Airport Road are included in this application as Appendix G.



## **5.1 Airport Access**

Most airports in the Northwest of similar size to the EORA have at least two major access points. Multiple access points are important for providing safe and efficient traffic circulation and to limit conflicts between Airport and Pendleton Industrial Park users. Access from more than one road is very important at commercial airports with adjacent industrial uses. Conflicts can develop when both commercial air users and industrial businesses must use a single road. This is the case in Pendleton where only Airport Road serves both commercial air and industrial business uses. The evaluation of the importance of multiple airport accesses is more fully detailed in Section 11.

## **5.2 OECDD Information**

At the request of the City of Pendleton, Jill Miles, Regional Development Officer with the Oregon Economic and Community Development Department, submitted a letter describing the importance of access for communities recruiting industrial businesses. A copy of this letter is attached as Appendix F. In her letter of November 14, 2002, Ms. Miles describes the importance transportation access has in industrial business recruitment. Citing her professional experience and communication with other economic development experts, she details how businesses consider access to major transportation facilities very important in their siting decisions. Pendleton is considered by economic specialists to have great potential for distribution/warehouse types of businesses given its location along I-84 and proximity to major markets in the Northwest. In her letter, Ms. Miles cites the opinion of several economic development experts on the importance of transportation access in recruiting new industries.

A new route between the EORA/Pendleton Industrial Park and I-84, in the opinion of the economic development experts, would enable Pendleton to market their available industrial lands. This new route would provide a much needed second access to the Airport and Pendleton Industrial Park and would provide a much more direct route for large trucks to access I-84. Currently, the State of Oregon is working on hiring a distribution industry specialist to help Northeast Oregon communities to recruit distribution/warehouse businesses. For the City of Pendleton, Umatilla County, and the State of Oregon, adequate access is key to being successful in recruiting these types of businesses to the Airport area.

## **5.3 Economic Development Research**

DEA has also conducted research on the importance of transportation access for encouraging the expansion and development of new industrial businesses. Research was conducted of both national and regional publications, with particular emphasis on industrial type businesses. The economic development information, provided by Jill Miles and DEA, to support this transportation goal exception application is detailed below:

### **1. Jill Miles, OECDD, Letter Dated 11/14/02 (Appendix F)**

In her letter, Ms. Miles provides technical economic development information she gathered from her own experience as a development officer, conversation with other professionals, and information provided to OEDD from businesses seeking industrial land for development. In evaluating this information, it was made clear that Pendleton is in a good position to attract

distribution type industries based on their location near I-84 and availability of vacant industrial land that has most of the needed infrastructure. The development of a new road connection between the EORA and Pendleton Industrial Park to I-84 will help the City in recruiting new businesses to Pendleton and Umatilla County.

OEDD supports this goal exception application to provide a better transportation access for general and commercial air services users, and to encourage new distribution type businesses to develop facilities and create jobs in Pendleton. The other economic development experts, cited in her letter, all concurred that there are opportunities for the distribution to locate new facilities in Eastern Oregon, and that interstate highway access is critical for new distribution industries locating new facilities. Ms. Miles also has provided siting information collected by OEDD on distribution type businesses looking to locate in Oregon. All of these inquiries stated that adequate transportation access is one of the important factors in their location analysis.

## **2. Linking Transportation System Improvements to New Business Development in Eastern Washington, William R. Gillis, The Gillis Group, 1994.**

This report was prepared for the Eastern Washington Intermodal Transportation Study to help shape the multimodal transportation network necessary for the efficient movement of freight and people throughout Eastern Washington. The paragraph excerpted from this report sums up the importance of good access for industrial development.

*“Because of its central importance, public highway investments which facilitate the efficient operation of truck motor freight will likely have the greatest impact on the development of new business and industry. Examples of investments important to truck movement include: ... providing trucks with the opportunity for efficient bypass of congested urban segments, constructing local access roads as needed to provide convenient truck access to ports, rail reloading facilities, airports, industrial parks, shopping centers and other truck destinations...”*

Although this report was prepared for the Eastern Washington region, the key points are also valid for Pendleton and Eastern Oregon. The proposed goal exception will enable Pendleton and Umatilla County to construct a new road that will allow for convenient access for air service users and freight trucks and enable cars and trucks to bypass the existing inadequate Airport Road route. The proposed extension of NW ‘A’ to I-84 will provide for a more direct, safe, and level route between the EORA/Pendleton Industrial Park and the freeway. In addition, this new route would allow large freight trucks to bypass the steep grade of the section of I-84 between Exits 202 and 207.

## **3. Professional Real Estate Development, The ULI Guide to Business, Richard Peiser, 1992.**

This economic development guide provides detailed information on what industries need for siting new facilities. This guide explains that it is important to site new businesses close to freeways. This reinforces the information provided by Jill Miles as it relates to distribution centers.



#### **4. Business Park and Industrial Development Handbook, ULI, 2001.**

This ULI handbook was specifically prepared to provide technical information to help in siting business and industrial parks. Business and industrial parks need adequate access to freeways and major road networks for the efficient and safe movement of people, goods, and services. This report states that industrial businesses should evaluate the transportation system in a community early in siting process.

All of the economic development information provided by OED and through DEA research supports the construction of a new road between the Airport and I-84. Airport Road is not adequate to provide efficient, safe, or reliable access to the industrial lands around the EORA. Distribution type businesses are dependent on having good access to roads with easy access to state highways. Even with improvements, the existing Airport Road would not be adequate for distribution type businesses that generate heavy truck traffic, to locate around the Airport. The extension of Stage Gulch (Alternatives 2, 3 or 5) would provided the needed access for a large volume of truck traffic.

### **6.0 Evaluation of Transportation Alternatives**

An evaluation has been made of the seven transportation improvement alternatives formulated for this goal exception land use application. Each of the alternatives has been evaluated based on the following criteria:

- Minimize impact to Exclusive Farm Use Zoned Lands
- Provide secondary, direct, at-grade Interstate access to the Regional Airport for regional emergency response
- Provide alternate access to the Regional Airport and Pendleton Industrial Park to address the declining level of service at existing Hwy 30/Airport Road intersection
- Provide a more level and safe roadway for transporting people, goods, and services between the Regional Airport and Pendleton Industrial Park and I-84
- Be completed within the available Congressional Funding Allocation
- Compliance with adopted city and county land use, transportation, and economic development plans.

The evaluation of each of the seven alternatives is summarized in Table 6.1 and detailed below.

#### **Alternative 1: Improve Airport Road**

Improvements would include repaving, and the addition of curbs, gutters, and sidewalks. This alternative is generally intended to increase safety for motor vehicles, bicycles, and pedestrians. This alternative does not address a second, at-grade emergency access to the overall Airport area.

Upgrades included with this alternative are a long-term recommendation of the City's TSP. A technical memorandum prepared by David Evans & Associates, (Appendix E) provides an engineering analysis of Airport Road and the improvements the City should consider in the future. Additional analysis of the Airport Road/Hwy 30 Intersection by Kittleson & Associates (Appendix L) identifies improvements required to avoid failure of the intersection functionality.

As detailed in this report, certain improvements can be made to Airport Road to bring it up to City standards. However, these improvements would not reduce the steepness and sharp curves of this route. Because Airport Road was constructed up a steep side slope, it would not be possible to significantly reduce the steep grades or curves. It is also difficult to keep open during and after winter storms. This existing route is not adequate for distribution type businesses that Pendleton and Umatilla County want to attract to the industrial lands around the Airport.

This alternative does provide for a direct interstate access route as identified in the Pendleton Comprehensive Plan, Airport Master Plan, and the City & County TSPs, but does not address slope challenges or provide secondary access.

**Alternative 2:           Extend NW ‘A’ Avenue (Frontage Road)**

This alternative was formulated to allow for construction of a second access to the airport and industrial park to I-84. The intent of the frontage road option, running parallel along a section of I-84, was to limit impacts to existing farm uses in the area west of the airport. This alternative does provide for a direct interstate access route as has been identified in the Pendleton Comprehensive Plan, Airport Master Plan, and the City & County TSPs. The frontage road route would have the less impact to existing field patterns and lower construction costs than Alternative 3 and 6.

This route would allow for a near level, safe access road to be constructed between the EORA and Pendleton Industrial Park to the Barnhart Road/I-84 Interchange, bypassing the 6% downgrade on I-84 and the 6% upgrade on Airport Road for traffic traveling to the Airport from areas west of I-84 Interchange 202. This connector road would reduce traffic on Airport Road and I-84 Interchange 207 and increase traffic on I-84 Interchange 202. It is expected that this new connector road would stimulate industrial development in the Airport industrial area. A technical memorandum prepared by Kittelson & Associates, Inc., (Appendix J) provides an engineering analysis describing the benefits of a connector road.

This alternative could not be constructed within the available Congressional Funding Allocation and was revised as reflected in Alternative 5 below.

**Alternative 3:           Extend NW ‘A’ Avenue (Direct Route)**

Alternative 3 would consist of extending NW ‘A’ Avenue west from the EORA to Barnhart Road near the I-84 Interchange (Exit 202). This alternative would provide a direct route for construction of a second Airport emergency access to Interstate I-84, as identified in the Pendleton Comprehensive Plan, Airport Master Plan and the City & County TSPs.

This connector road would reduce traffic on Airport Road and I-84 Interchange 207 and increase traffic on I-84 Interchange 202. It is expected that this new connector road would stimulate industrial development in the Airport industrial area. A technical memorandum prepared by Kittelson & Associates, Inc., (Appendix J) provides an engineering analysis describing the benefits of a connector road.



Five major drainages ravines would need to be crossed in order to provide a near level access road between the EORA/Pendleton Industrial Park and I-84. Although the overall road length is less than either frontage road alternative (Alternatives 2 & 5) and follows the same alignment at its easterly end, the proposed alignment has the greatest impact to existing field patterns between EORA/Pendleton Industrial Park and I-84. The amount of EFU zoned land impacted would be the greatest of all three alternatives.

**The costs associated with either bridging or filling the drainage areas is greater than with either Alternative 2 or Alternative 5, and cannot be completed with the available Congressional Funding Allocation.**

#### **Alternative 4: Improve Stage Gulch Road**

This alternative would require that an 8.1-mile section of the existing Stage Gulch Road be improved to AASHTO design standards to provide access between the EORA/Pendleton Industrial Park to the Barnhart Road/I-84 Interchange. According to information provided by Jon Jinings at DLCD, this alternative would not require goal exceptions because it is an existing road. ORS 215.283 (L) allows public roads on EFU land to be reconstructed or modified so long as these improvements do not include additional travel lanes or displace buildings. However, in order to bring this route up to AASHTO standards, 60-75 acres of EFU land would be lost under this alternative.

This connector road would reduce traffic on Airport Road and I-84 Interchange 207 and increase traffic on I-84 Interchange 202. However, this new connector road is not expected to stimulate industrial development in the Pendleton Industrial Park as it would require a significant amount of out of direction travel for EORA/Pendleton Industrial users and emergency responders traveling between the airport and I-84.

This alternative does not provide a direct route for a second Airport access to Interstate I-84, as identified in the Pendleton Comprehensive Plan, Airport Master Plan and the City and County TSPs.

Most of the Barnhart Road portion of this alignment is greater than 6% slope and is not conducive to truck traffic as it travels north to the Stage Gulch drainage. This alternative will not provide a flat, ready access from the interstate to the Airport and industrial area as identified in the Pendleton Comprehensive Plan, Airport Master Plan and the City & County TSPs.

#### **Alternative 5 – Extend Stage Gulch Road via Frontage Road**

This alternative is a revision of the Alternative 2 Frontage Road, which shortens the overall length and realigns the eastern connection at Stage Gulch Road. It does allow for construction of a second access to the airport and industrial park to I-84 and limits impacts to existing farm use field patterns in the area west of the airport. This alternative does provide for a direct interstate access route as has been identified in the Pendleton Comprehensive Plan, Airport Master Plan, and the City & County TSPs.

In comparison to the alignment for Alternative 2, the additional affected EFU zoned land is about 0.7 acre for this alignment. A portion of this route would be located adjacent to I-84 to minimize impacts to farm operations and Exclusive Farm Use (EFU) zoned land.

This connector road would allow vehicles to bypass the 6% downgrade on I-84 and the 6% upgrade on Airport Road for traffic traveling to the Airport from areas west of Interchange 202 on I-84. This connector road would reduce traffic on Airport Road and Interchange 207 and increase traffic on I-84 Interchange 202. It is expected that this new connector road would stimulate industrial development in the Airport industrial area. The technical memorandum prepared by Kittelson & Associates, Inc., (Appendix J) provides an engineering analysis describing the benefits of a connector road.

This alternative can be constructed within the available Congressional Funding Allocation.

**Alternative 6 – New Interchange**

Although this alternative does provide the most direct connection with the least impacts on EFU zoned lands, it does not meet Federal Highway and ODOT spacing requirements for interstate interchanges. In accordance with the Oregon Highway Plan, the minimum interchange spacing for urban areas is 3 miles and for rural areas is 6 miles. For this alternative, it would be classified as a rural interchange application. The existing I-84 interchanges are spaced 5 miles apart; thus, no new interchange is allowed and access must be derived from the existing interchanges. Additionally, costs associated with construction of a new interchange exceed the available Congressional Funding Allocation.

**Alternative 7 – Improve Stage Gulch Road and Snyder Road to Hwy 37**

This alternative would require construction of 5.1 mile road, of which approximately 4.0 miles would be on EFU zoned land located west and north of the City’s UGB and directly affect about 25- to 40-acres of EFU zoned land.

This alternative does not provide a direct route for a second Airport access to Interstate I-84. It is slightly more than 9.3 miles in length and requires a significant amount of out of direction travel between the industrial area and I-84 Interchange 207.

This connector road is not expected to reduce traffic at the Airport Road/I-84 Interchange 207 where traffic will travel Westgate to access I-84. This alternative is not expected to stimulate industrial development in the Pendleton Industrial Park as it would require a significant amount of out of direction travel between the airport and I-84.

The proposed route is not identified in either the City or County Transportation Systems plans.

**Table 6.1: Summary of Alternatives**

Alternative	Total Length in Miles	City/UGB Length in Miles	County EFU Length in Miles	County EFU Impacts in Acres	Cost
1	1.8	1.8	n/a	n/a	\$ 2,700,000
2	4.8	1.3	3.5	50 to 60	\$ 7,200,000
3	4.1	1.2	2.9	90 to 100	\$ 7,990,000



4	8.1	1.1	7.0	60 to 75	\$11,100,000
5	3.9	0.4	3.5	50 to 60	\$ 5,850,000
6	2.6	1.4	1.2	20 to 35	\$23,900,000
7	9.3	5.3	4.0	25 to 40	\$ 7,050,000

## 6.1 Preferred Alternative

Based on this evaluation, the City of Pendleton has selected Alternative 5, Stage Gulch to Barnhart (Frontage Road) as the preferred route. It was selected because it will provide a much needed second access, and best complies with the long-term goals of the City of Pendleton Comprehensive Plan, the City and County TSP, City Airport Master Plan, and City economic development plans. It was also selected, because this direct level route had the lowest cost of any of the three new build alternatives and minimized impact to EFU Zoned land. The preferred alternative will require exceptions to Statewide Planning Goals before it can be constructed. Findings to support the Alternative 5 exceptions are detailed in the following section.

## 7.0 Findings of Fact

The connector between Stage Gulch and Interstate 84, otherwise known as Alternative 5 will cross approximately 3.5 miles of rural land (zoned EFU) outside of Pendleton's UGB, requiring an exception to Oregon State Land Use Goals 3 (Agricultural Lands), 11 (Public Facilities and Services), and 14 (Urbanization). As noted above, findings to demonstrate compliance with OAR 660-12-070 will also demonstrate compliance with criteria to justify an exception to Goals 3, 11 and 14.

The Transportation Planning Rule, (TPR) in 660-012-0070, established the criteria for exceptions to transportation projects on rural lands. New transportation projects are not allowed except where a land use application can demonstrate compliance with OAR 660-012-0070. The construction of preferred Alternative 5 requires exceptions to the following goals:

- Goal 3: Agricultural Lands
- Goal 11: Public Facilities
- Goal 14: Urbanization

Justification for exceptions to Goals 3, 11 and 14 will be demonstrated in Section 10 below, Findings of Fact. Exceptions to Goals 3, 11 and 14 will be validated by demonstrating compliance with OAR 660-12-0070. The OAR criteria are shown below in *italic* followed by a finding of compliance in standard text.

### 7.1 Compliance with OAR 660-12-070: Exceptions for Transportation Improvements on Rural Land

*OAR 660-12-0070(1): Transportation facilities and improvements which do not meet the requirements of OAR 660-012-0065, require an exception to be sited on rural lands.*

The proposed construction of the connector road between Stage Gulch Road and Barnhart Road does not meet the requirements of OAR 660-012-0065. Therefore, this OAR is applicable. Approximately 3.5 miles will be constructed in an Umatilla County EFU zone.

*OAR 660-12-0070(1)(a) A local government approving a proposed exception shall adopt as part of its comprehensive plan findings of fact and a statement of reasons that demonstrate that the standards in this rule have been met. A local government denying a proposed exception shall adopt findings of fact and a statement of reasons explaining why the standards in this rule have not been met. However, findings and reasons denying a proposed exception need not be incorporated into the local comprehensive plan.*

*OAR 660-12-0070(1)(b) The facts and reasons relied upon to approve or deny a proposed exception shall be supported by substantial evidence in the record of the local exceptions proceeding*

This exception document provides the findings of fact and reasons demonstrating compliance with the applicable exception standards required by Goal 2 and ORS 197.732. In addition to the findings contained in this document, there is also other supporting information addressing the need for the new access. These include letters of support from potential businesses interested in locating near the Airport and support from local and state planning staff familiar with the issues relating to the Airport's existing deficient access route.

*OAR 660-12-0070(3): An exception shall, at minimum, decide need, mode, function, and general location for the proposed facility of improvement*

Umatilla County will recognize the connector road based in part with findings of need, mode, function and general location of the preferred alternative as follows

- **Need:** The connection of Stage Gulch Road to Barnhart Road is needed as a secondary access to the EORA and Pendleton Industrial park. The EORA provides commercial air services to Northeast Oregon. The majority of the city's buildable industrial land is located around the airport. A second, at grade airport/interstate access is needed for emergency response to natural disasters, CSEPP and Homeland Security events. The existing Airport Road does not provide a safe and efficient route between US 30 and the airport. This road is located on a steep side slope that would not allow Pendleton to reduce the road grade or remove the sharp curves. During the winter months, the existing access can be shut down during and after winter storms. This effectively blocks all traffic to the EORA and industrial area.

The other need is based upon the recent evaluation of the functionality and capacity of the Highway 30 and Airport Road intersection. See attached Technical Memo #4 from Mark Butorac, Kittelson and Associates. That memo shows that the Airport Road and Highway 30 intersection will exceed capacity prior to buildout of the industrial park.

- Industrial businesses have declined to locate at the airport industrial park because of the lack of a more direct route to I-84. The city and county believe the road is essential for economic development to be fully realized. DLCD staff has indicated that economic development is not, in itself sufficient justification of need. Therefore, the above dual justification of need sufficiently established the record of need and the application is in compliance with this standard.



- **Mode:** The proposed connector road will provide access for motor vehicles, truck and freight trucks traveling between the EORA and industrial park and I-84. This new road will be constructed to Federal Highway Standards (AASHTO) as described in the Section 7.
- **Function:** The proposed connector road will be a multi-function vehicle and truck arterial road as well as a freight route.
- **General Location:** The preferred alignment (Alternative 5) is a 3.9 mile long frontage road on the north side of I-84 between the existing paved section of Stage Gulch Road and Barnhart Road near the I-84 Interchange 202.

*OAR 660-12-0070(3)(a): The general location shall be specified as a corridor within which the proposed facility or improvement is to be located, including the outer limits of the proposed location. Specific sites or areas within the corridor may be excluded from the exception to avoid or lessen likely adverse impacts. Where detailed design level information is available, the exception may be specified as a specific alignment.*

The preferred alignment (Alternative 5) is a frontage road, within an 80 foot wide right-of-way, on the north side of I-84 between the existing paved section of Stage Gulch Road and Barnhart Road near the I-84 Interchange 202. It is 3.9 miles long and follows the route described in Section 4.5 and illustrated in Figure 4.5 of this document. Impacted EFU area calculations are shown in Table 6.1.

An Interchange Area Management Plan (IAMP) is being prepared as a component of the engineering design of the westerly terminus of the proposed roadway at Barnhart Road/I-84 Interchange 202. Preparation and adoption of the IAMP will help to protect the function of this new road as a limited access roadway, protect the operation of the interchange, and protect the farmland adjacent to this new road. The IAMP will be adopted by Umatilla County, and ODOT.

*OAR 660-012-0070(3)(b): The size, design and capacity of the proposed facility or improvement shall be described generally, but in sufficient detail to allow a general understanding of the likely impacts of the proposed facility or improvement and to justify the amount of land for the proposed transportation facility. Measures limiting the size, design or capacity may be specified in the description of the proposed use in order to simplify the analysis of the effects of the proposed use.*

The preferred roadway alignment (Alternative 5) will be an 80 foot wide arterial street extending from the EORA at Stage Gulch Road to near Barnhart Road. It will include two 11-foot wide travel lanes and two 6-foot wide shoulders within the 80-foot wide right-of-way. It will be designed to conform with Federal Highway (AASHTO) road design standards. As shown in the transportation impact report, this new road will have adequate capacity over the next 20 years.

*OAR 660-012-0070(3)(c): The adopted exception shall include a process and standards to guide selection of the precise design and location within the corridor and consistent with the general description of the proposed facility or improvement.*

The City of Pendleton is requesting these Statewide Planning Goal Exceptions to allow for the extension of Stage Gulch Road between the EORA to Barnhart Road near the I-84 Interchange. Because this new road is funded through a Congressional allocation the road will be designed to AASHTO design standards, as a requirement of the federal funding. The City of Pendleton is taking the lead in obtaining the land use approval and will then proceed with the design and construction phases of the project.

*OAR 660-012-0070(3)(d): Land use regulations implementing the exception may include standards for specific mitigation measures to offset unavoidable environmental, economic, social or energy impacts of the proposed facility or improvement or to assure compatibility with adjacent uses.*

An Environmental Assessment of the preferred alignment is currently being prepared as a requirement of the Federal funding of the proposed roadway. The mitigation measures identified are being addressed in the design of the roadway. The environmental, economic, social and energy impacts (ESEE Analysis) for this goal exception land use application is detailed in Section 7.2. It has been determined through the ESEE analysis, that there are no sensitive environmental, economic, social or energy impacts associated with the proposed connector road. As part of this significant transportation project, Umatilla County and ODOT will adopt an Interchange Area Management Plan for the intersection at Barnhart Road and Interstate 84 at Exit 202. Adjacent farm land will be protected to preserve continued farm use by limiting the development of non-farm uses.

*OAR 660-12-0070(4): To address Goal 2, Part II(c)(1) the exception shall provide reasons justifying why the state policy in the applicable goals should not apply. Further, the exception shall demonstrate that there is a transportation need identified consistent with the requirements of OAR 660-012-0030 which cannot reasonably be accommodated through one or a combination of the following measures not requiring an exception:*

- (a) Alternative modes of transportation;*
- (b) Traffic management measures; and*
- (c) Improvements to existing transportation facilities.*

- **Alternative modes of transportation.**

This land use application has provided the technical information to show the need for construction of a new road between the EORA and I-84. This new road will provide improved access for motor vehicles between the Airport and Pendleton Industrial Park to the interstate highway system.

There are no alternative modes available to accommodate the movement of people, goods and services at-grade between the airport area to I-84. Additionally, there are no alternative modes that can provide a second interstate access for emergency response. No alternative modes have



been identified to address Airport Road/Highway 30 intersection exceeding its design capability prior to full build out of the industrial park.

*(a) Traffic management measures*

There are no traffic management measures available to provide a second improved access to the airport. The new road is needed to address safety, improved access and circulation and improve economic development opportunities. The goal exception purpose can not be addressed with traffic management measures.

*(b) Improvements to existing transportation facilities*

The improvement of Airport Road (Alternative 1) was considered in this land use application. Although some improvements are possible, the steep and winding route can not be improved to address safety, road closures, and access issues. Because of its location along a side slope, the existing Airport Road route can be improved to reduce the radius of sharp curves or reduce the steep grade. In addition, the improvement of Airport Road will not meet the needs of Pendleton and Umatilla County to provide a much needed second access.

In addition, the improvement of Stage Gulch Road (Alternatives 4 & 7) were considered in this land use application. Because these routes would require significant out of direction travel and steeply sloped grades they were determined not to comply with adopted city and county land use, transportation, and economic development plans. These long routes would be difficult to improve and maintain and not be suitable for improved travel between the EORA and I-84.

*OAR 660-012-0070(5) To address Goal 2, Part II(c)(2) the exception shall demonstrate that non-exception locations cannot reasonably accommodate the proposed transportation improvement or facility. The exception shall set forth the facts and assumptions used as the basis for determining why the use requires a location on resource land subject to Goals 3 or 4.*

As noted in Section 4 above, seven alternatives were considered. The preferred Alternative 5 was selected for a number of reasons, as follows:

*OAR 660-012-0070(6) To determine the reasonableness of alternatives to an exception under sections (4) and (5) of this rule, cost, operational feasibility, economic dislocation and other relevant factors shall be addressed. The thresholds chosen to judge whether an alternative method or location cannot reasonably accommodate the proposed transportation need or facility must be justified in the exception.*

Within the UGB and City Limits all alternative routing alignments, to connect I-84 and the EORA/Pendleton Industrial Park, are limited by slopes in excess of 6%. Direct interstate access cannot be routed along existing County road alignments, due to significant out of direction travel and slope limitations exceeding 6%. All remaining alternative alignments must cross EFU Zoned land to the west, north and east.

Alternative 5 is the only alternative which provides a secondary, direct, at-grade access to the EORA and Pendleton Industrial Park reduces traffic impacts on the Airport Road/Hwy 30 intersection, minimizes impacts to EFU Zoned land, and can be constructed with the available Congressional funding allocation.

*OAR 660-012-0070(6)(a) In addressing sections (4) and (5) of this rule, the exception shall identify and address alternative methods and locations that are potentially reasonable to accommodate the identified transportation need.*

There are no alternative modes available to accommodate the movement of people, goods and services at-grade between the airport area to I-84. Additionally, there are no alternative modes that can provide a second interstate access for emergency response. No alternative modes have been identified to address Airport Road/Highway 30 intersection exceeding its design capability prior to full build out of the industrial park.

Alternative 5 is the only alternative which provides a secondary, direct, at-grade access to the EORA and Pendleton Industrial Park reduces traffic impacts on the Airport Road/Hwy 30 intersection, minimizes impacts to EFU Zoned land, and can be constructed with the available Congressional funding allocation.

*OAR 660-012-0070(6)(c) Detailed evaluation of specific alternative methods or locations identified by parties during the local exceptions proceedings is not required unless the parties can specifically describe with supporting facts why such methods or locations can more reasonably accommodate the identified transportation need, taking into consideration the identified thresholds.*

The existing Airport Road does not provide a safe and efficient route between US 30 and the airport. This road is located on a steep side slope that would not allow Pendleton to reduce the road grade or remove the sharp curves. During the winter months, the existing access can be shut down during and after winter storms. This effectively blocks all traffic to the EORA and industrial area.

Within the UGB and City Limits all alternative routing alignments, to connect I-84 and the EORA/Pendleton Industrial Park, are limited by slopes in excess of 6%. Direct interstate access cannot be routed along existing County road alignments, due to significant out of direction travel and slope limitations exceeding 6%. All remaining alternative alignments must cross EFU Zoned land to the west, north and east.

Alternative 5 is the only alternative which provides a secondary, direct, at-grade access to the EORA and Pendleton Industrial Park reduces traffic impacts on the Airport Road/Hwy 30 intersection, minimizes impacts to EFU Zoned land, and can be constructed with the available Congressional funding allocation.

**OAR 660-12-070(7) To address Goal 2, Part II(c)(3), the exception shall:**

*(a) Compare the economic, social, environmental and energy consequences of the proposed location and other alternative locations requiring exceptions. The*



*exception shall describe the characteristics of each alternative location considered by the jurisdiction for which an exception might be taken, the typical advantages and disadvantages of using the location for the proposed transportation facility or improvements, and the typical positive and negative consequences resulting from the transportation facility or improvement at the proposed location with measures designed to reduce adverse impact;*

The environmental, economic, social and energy impacts (ESEE Analysis) for this goal exception land use application is detailed in Section 7.2. It has been determined through the ESEE analysis, that there are no sensitive environmental, economic, social or energy impacts associated with the proposed connector road. As part of this significant transportation project, Umatilla County and ODOT will adopt an Interchange Area Management Plan for the intersection at Barnhart Road and Interstate 84 at Exit 202. Adjacent farm land will be protected to preserve continued farm use by limiting the development of non-farm uses.

*(b) Determine whether the net adverse impacts associated with the proposed exception site, with mitigation measures designed to reduce adverse impacts, are significantly more adverse than the net impacts from other locations which would also require an exception. A proposed exception location would fail to meet this requirement only if the affected local government concludes that the impacts associated with it are significantly more adverse than the other identified exception sites. The exception shall include the reasons why the consequences of the needed transportation facility or improvement at the proposed exception location are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed location. Where the proposed goal exception location is on resource lands subject to Goals 3 or 4, the exception shall include the facts used to determine which resource land is least productive; the ability to sustain resource uses near the proposed use; and the long-term economic impact on the general area caused by irreversible removal of the land from the resource base; and*

As stated in Section 4.5 and shown in Table 6.1, Alternative 5 has the least impact to existing field patterns by routing the alignment along the existing I-84 right-of-way and impacts the least amount of EFU Zoned land (see Figure 6.1) of any direct, at-grade access to the Interstate from the EORA/Pendleton Industrial Park. An Interchange Area Management Plan (IAMP) is being prepared as a component of the engineering design of the westerly terminus of the proposed roadway at Barnhart Road/I-84 Interchange 202. Preparation and adoption of the IAMP will identify measures to protect the function of this new road as a limited access roadway while protecting the farmland adjacent to this new road. The IAMP should be adopted by Umatilla County, and ODOT.

*(c) The evaluation of the consequences of general location or corridors need not be site specific, but may be generalized consistent with the requirement of section (3) of this rule. Detailed evaluation of specific alternative locations identified by parties during the local exceptions proceeding is not required unless such locations are specifically described with facts to support the assertion that the locations have*

*significantly fewer net adverse economic, social, environmental and energy impacts than the propose exception location.*

There are no alternative modes available to accommodate the movement of people, goods and services at-grade between the airport area to I-84. Additionally, there are no alternative modes that can provide a second interstate access for emergency response. No alternative modes have been identified to address Airport Road/Highway 30 intersection exceeding its design capability prior to full build out of the industrial park.

There are no traffic management measures available to provide a second improved access to the airport. The new road is needed to address safety, improved access and circulation and improve economic development opportunities. The goal exception purpose can not be addressed with traffic management measures.

The goal exception purpose cannot be addressed within the UGB/City Limits due to severe slopes south of the airport. ODOT and Federal Highway spacing requirements do not allow placement of an I-84 Interchange closer to the UGB/City Limits of Pendleton.

**OAR 660-012—0070(9) *To address Goal 2, Part II(c)(4), the exception shall:***

- (a) Describe the adverse effects that the proposed transportation improvement is likely to have on the surrounding rural lands and land uses, including increased traffic and pressure for nonfarm or highway oriented development on areas made more accessible by the transportation improvement;*

The City of Pendleton and Umatilla County are willing to adopt measures to restrict access along this new road outside the Pendleton UGB to EFU uses. As proposed, this new road would become a city street after it was constructed.

- (b) Demonstrate how the proposed transportation improvement is compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts. Compatible is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses; and*

The alignment of preferred Alternative 5 will would be located adjacent to I-84 to minimize impacts to farm operations and Exclusive Farm Use (EFU) zoned land. The proposed roadway design will identify access for farm operations on EFU Zoned land and the IAMP will identify access for County Industrial/Commercial properties.

- (c) Adopt as part of the exception, facility design and land use measure which minimize accessibility of rural lands from the proposed transportation facility or improvement and support continued rural use of surrounding lands.*

The City of Pendleton and Umatilla County are willing to adopt measures to restrict access along this new road outside the Pendleton UGB to EFU uses. As proposed, this new road would become a city street after it is constructed.



**OAR 660-012-0070(10)**

*An exception taken pursuant to this rule does not authorize uses other than the transportation facilities or improvements justified in the exception.*

*(a) Modifications to unconstructed transportation facilities or improvements authorized in an exception shall not require a new exception if the modification is located entirely with the corridor approved in the exception*

The requested exception is for the Congressionally funded frontage road to connect I-84 and the EORA/Pendleton Industrial Park. The requested exception is limited to the actual right-of-way width to construct the facility with its associated slope and fill areas and identified access points to AASHTO standards.

*(b) Modifications to constructed transportation facilities authorized in an exception shall require a new exception, unless the modification is permitted without an exception under OAR660-012-0065(3)(b)-(f). For purposes of this rule, minor transportation improvements made to a transportation facility or improvement authorized in an exception shall not be considered a modification to a transportation facility or improvement and shall not require a new exception.*

Not applicable where this application is for a new transportation facility.

*(c) Notwithstanding subsections (a) and (b) of this section, the following modifications to transportation facilities or improvement authorized in an exception shall require new goal exceptions:*

*(A) New intersections or new interchanges on limited access highways or expressways, excluding replacement of an existing intersection with an interchange.*

An Interchange Area Management Plan (IAMP) is being prepared for the westerly terminus of the proposed roadway at Barnhart Road/I-84 Interchange 202. Preparation and adoption of the IAMP will identify new intersections with this new road while protecting the farmland adjacent to this new road. The IAMP will be adopted by Umatilla County, and ODOT.

*(B) New approach roads located within the influence area of an interchange.*

An Interchange Area Management Plan (IAMP) is being prepared for the westerly terminus of the proposed roadway at Barnhart Road/I-84 Interchange 202. Preparation and adoption of the IAMP will limit access roadway while protecting the farmland adjacent to this new road. The IAMP will be adopted by Umatilla County, and ODOT.

*(C) Modifications that change the functional classification of the transportation facility.*

Upon approval of this exception, the City and County TSPs will be amended to include the new facility as a limited access City Arterial Street.

*(D) Modifications that materially reduce the effectiveness of facility design measures or land use measures adopted pursuant to subsection (8)(c) of this rule to minimize accessibility to rural lands or support continued rural use of surrounding rural lands, unless the area subject to the modification has subsequently been relocated inside an urban growth boundary.*

The City of Pendleton and Umatilla County are willing to adopt measures to restrict access along this new road outside the Pendleton UGB to EFU uses. As proposed, this new road would become a city street after it was constructed.

## **7.2 ESEE Analysis**

### **7.2.1 Economic Consequences**

#### ***Acreage Requirements and Impacts to Existing and Planned Land Uses***

All Alternative alignments assume construction of a 34-foot-wide paved AASHTO standard arterial road with two 11-foot-wide lanes and 6-foot-wide shoulders, within an 80-foot right-of-way. All Alternative alignments, with the exception of Alternative 1, would require acquisition of EFU Zoned land as shown in Table 6.1. Within the City UGB these alternatives would have the same alignment and require approximately 11.2 acres of land zoned M-1. Outside of the City, Alternative 2, 3 and 5 would have the same alignment at the westerly terminus at Barnhart Road. The actual westerly alignment and acreage will be determined through the IAMP process.

Within the UGB, the adverse economic impacts of any alternative would be the same because they would use the same alignment, which is essentially an extension of NW 'A' Avenue/Stage Gulch Road. There would be no commercial or residential displacements, and access from the existing street system would not be affected. Right-of-way requirements would require a few landowners to sell a portion of their property for the new alignment, although in general terms, the overall impacts to the parcels would be minor considering the size of Pendleton Industrial Park.

Outside of the UGB, all alternatives would impact parcels that are currently used to grow wheat. Alternative 6 would have the least adverse impact (20-35 acres) because it is the shortest route. Alternatives 2 and 5 would follow along I-84 as a frontage road for approximately 2 miles before connecting with the I-84/Barnhart Road Interchange and would impact (50-60 acres) of farmland, but minimize disruption of existing field patterns. Alternative 3 would have the greatest adverse impact (90-100 acres) because it traverses directly across farmland for the entire alignment. Alternatives 4 & 7 follow existing County Roads and require additional acreage (60-75 acres and 25-40 acres respectively) for right-of-way width and realignment of curves. No alternative would displace or encroach on any commercial or residential uses.

Alternatives 2, 3, 5 & 6 would have a positive impact on the EORA/Pendleton Industrial Park by providing a direct at-grade Interstate access. Both passengers and goods are expected to increase now that the nearby Umatilla Weapons Disposal Facility, Union Pacific's Hinkle Rail Yard, Wal-Mart Distribution Center, and Two Rivers State Correctional Facility are now completed. New development in Pendleton Industrial Park would also have a positive impact on the Airport



and surrounding community. These alternatives add a second access road to the Airport that would be at a much lower grade (approximately 1.5 percent) than the existing access via Airport Road (six percent). Current access via Airport Road is sited as a determining factor why businesses have chosen not to relocate to Pendleton Industrial Park, preferring other sites with more level access often not in the vicinity.

A survey of other similar-sized airports in Oregon and Washington revealed that the Pendleton Airport has fewer access routes than other airports surveyed (Table 7.1). The proposed alternatives would give the Airport a second access route in the event that the other is blocked by an accident or natural event, such as the frequent snow and ice storms the Pendleton area experiences during the winter. These occasions would prevent emergency vehicles from accessing the Airport. An alternative route, one that is less windy and a lower-grade would also reduce the risk of accidents involving large trucks coming from Pendleton Industrial Park.

**Table 7.1: Number of Approaches at Other Airports**

Airport Name	Location	Number of Access Routes
Eastern Oregon Regional Airport	Pendleton, OR	1
Grant County International Airport	Moses Lake, WA	2
Hillsboro Airport	Hillsboro, OR	More than 3
LaGrande/Union County Airport	LaGrande, OR	1
Roberts Field	Redmond, OR	2
Rogue Valley International Airport	Medford, OR	3
Skagit Valley Airport	Anacortes, WA	1
Tri Cities Airport	Pasco, WA	2

Alternatives 2, 3, 5 & 6 would have a positive impact to the area by providing Pendleton Industrial Park with a needed access route for trucks carrying goods to and from Pendleton Industrial Park. The City of Pendleton and Airport leaders view developing Pendleton Industrial Park as essential to the well-being of the community, which as stated before, is currently lacking suitable commercial and light industrial sites. The City and Airport have done extensive improvements to public facilities and buildings in recent years, hoping to attract new businesses. To prevent urban development outside of the Pendleton's UGB, the City would own right-of-way, thereby limiting any accesses and preventing any further loss of farmland.

Alternative 2 and 5 would fragment the farmland less than Alternative 3 because they would be located next to I-84 for a portion of the alignments, and would convert less EFU land than Alternative 3 because of the more level topographic routing. The current landowners are participating in the ongoing IAMP process, have consented to this application and appointed the City as their agent.

Alternatives 2, 3 and 5 would not have any discernable adverse social impacts, either inside or outside of the UGB. There would be no commercial or residential displacements, nor would there be any discernable impacts to existing access for nearby uses.

These alternatives would have a positive social impact on the area by providing an interstate connection for emergency response to natural disasters and Homeland Security events and enhancing the potential viability of the Pendleton Industrial Park as a location for businesses who need access to a regional airport and a source of employees. According to the US Census (U.S. Census Bureau, 1990), Umatilla County and Pendleton have maintained steady growth rates over the last ten years with the County growing even faster than Pendleton.<sup>2</sup>

The region is ripe for attracting new development, with many companies already locating to the area. In 1998, Umatilla County had the highest increase in the number of jobs of any county outside of a metropolitan area (OED, 2000). The economy now offers more diversified job opportunities, led by service-oriented jobs. Census 2000 data shows that Pendleton is similar to the County, with the highest number of the jobs in the service industries followed by wholesale and retail trade. Pendleton does still have a high number of manufacturing jobs, possibly relating to a few large industries still remaining in the City. Although current data for Pendleton are not available, it is likely that the more recent County data also reflects changes in Pendleton's economy because it is the largest city in the County and one of the primary commercial centers. Alternatives 2, 3 & 5 could foster additional commercial growth in an area where the Airport and the City would like to see it occur and be a strong catalyst for further diversifying the economy. Some areas within Pendleton are also rapidly developing, but as stated earlier, there is a lack of prime commercial and industrial sites. Alternatives 4 & 6 lack the direct, level Interstate access required to facilitate the industrial growth that would serve as a positive social impact.

There is little difference between Alternatives 2, 3 and 5 in the degree of social impact. These alternatives would facilitate emergency access to the Interstate and carry the same number of trucks, and potential for job creation in Pendleton Industrial Park would likely be the same.

### **7.2.2 Environmental Consequences**

The Umatilla County Comprehensive Plan (Umatilla County Planning Department, 1983) identifies the project area as EFU (as established in ORS 215.203) and, with a special designation as a part of the North/South County Agricultural Region. Generally, this region is designated for commercial farming and agriculture, and requires a minimum parcel size of 160 acres.

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<sup>2</sup> Overall, Census data indicate that the population in Pendleton grew between 1970 and 1990 with a 0.69 percent average annual growth rate, and has increased in the last decade from a population of 15,142 to 16,354, with an annual average growth rate of 0.77 percent. Umatilla County has also grown, but most of that growth occurred in the 1970's, when it added 13,938 individuals between 1970 and 1980 followed by much slower growth between 1980 and 1990 (added only 338 individuals). Overall, the County had a 1.39 percent per year increase in population between 1970 and 1990. Umatilla County is again experiencing faster growth at 1.76 percent per year between 1990 and 2000. Overall, Umatilla County has experienced similar rates of growth as the state (Oregon Employment Department [OED], 2000).



### **7.2.3 Wetlands and Wildlife Habitat**

National Wetlands Inventory Maps were used to determine, where, if any, wetlands or wetland resources are located within the project area (USFWS, 1991a and 1991b). There is an area to the north of the Barnhart Road/I-84 interchange identified as plastron emergent temporarily flooded (PEMA). Alternatives 3, 4 & 7 could possibly cross the area, but the new road could be constructed to minimize impacts to the stream. In the event of any stream impacts, the project design and construction would coordinate with local and state agencies to ensure minimization of any impacts to the stream. Alternatives 2, 5 & 6 do not directly impact the identified wetland resource, but will be further studied in the on-going Environmental Assessment associated with the Federal funding.

The Umatilla County Comprehensive Plan (Umatilla County Planning Department, 1983) and accompanying resource document identify and inventory wetlands, wildlife habitat, and other natural resources such as threatened or endangered species. The resources inventory does not list any natural resources within the project area. Discussions with County planning staff confirmed that to the best of their knowledge, the Comprehensive Plan inventory still accurately represents the natural resources within the project area.

### **7.2.4 Noise**

Development within the portion of the study area that encompasses the conceptual alignments of Alternatives 2, 3 and 5 are limited to one rural residential property that straddles the section line between the southeast corner of Section 35, Township 3 North, Range 31 East and the northeast corner of Section 2, Township 2 North, Range 31 West. FHWA and ODOT acknowledge that traffic noise impacts to residences begin to occur when predicted traffic noise levels are 2 dBA<sup>3</sup> below the noise abatement criterion<sup>4</sup> of 65 dBA for residences. Traffic noise impacts can also occur when the future predicted noise levels substantially exceed the existing noise levels. A substantial increase in noise is 10 dBA or more.

No noise analysis was conducted for this project. However, it is anticipated that existing and future noise levels with or without a new two-lane roadway through the study area would remain substantially below the noise abatement criteria levels. Under either of the build alternatives, the projected traffic volumes would be too low to result in traffic noise impacts using FHWA and ODOT standards. The proposed alignments shown for Alternative 2, 3 and 5 indicates that the new roadway would be located greater than one half mile from the rural residential property identified above.

### **7.2.5 Air Quality**

An air quality impact occurs if a violation of the National Ambient Air Quality Standards (NAAQS) or State Ambient Air Quality Standard (SAAQS) is projected for a project. Air quality has not historically been an issue in the Pendleton region, and the year 2021 intersection and link volumes projected to occur under the proposed alternatives are substantially lower than those that typically cause air quality violations. With regard to air quality impacts, there is no

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<sup>3</sup> "A-weighted" decibel (dB)

<sup>4</sup> Table 1 in 23 CFR 772

measurable difference between Alternative 2, 3 and 5, and there is no indication that violation of the NAAQS or SAAQS would occur as a result of any of these potential alternatives.

### 7.2.6 Soils

Alignments for alternatives 2, 3, 5, 6 and 7 would potentially cross several different soil types. The route for Alternative 5 is identical to Alternative 2 on the west end, and deviates only on the east end where it connects to the existing county road (Stage Gulch Road). Estimates of the impacts to soils are approximate, the eventual alignment may not affect the same soil types. Alternatives 2, 3 and 5 would potentially affect four soil types. Alternative 7 would potentially affect only two soil types, but all alignments impact "prime" agricultural soils. (Table 7.2)

**Table 7.2: Soils in the Project Area**

Soil Type	Alt. 2&5	Alt. 3&6	Alt. 7	Capability	Prime
Anderly silt loam, 1 to 7 percent slopes (6B)	✓			III	
Anderly silt loam, 7 to 12 percent slopes (6C)	✓	✓	✓	III	
Walla Walla silt loam, 1 to 7 percent slopes (114B)	✓	✓	✓	II	✓
Walla Walla silt loam, 7 to 12 percent slopes (114C)	✓	✓		III	
Walla Walla silt loam, 12 to 25 percent slopes (115D)		✓		IV	

Source: SCS, 1988.

Anderly silt loams (6B and 6C) are moderately deep, well drained soils on broad summits, and are suited to non-irrigated grain crops. This soil type also supports grazing, although it should be managed to protect the desired plant communities. Walla Walla silt loams (114B and 114C) are characterized by deep, well-drained soils on broad summits. Most soil of this type is non-irrigated and is used for wheat, other grain crops, and rangeland. Walla Walla silt loams are sometimes irrigated, usually with sprinkler type systems. Like Anderly silt loams, Walla Walla silt loams have a moderate hazard of water erosion. Walla Walla silt loam (115D) resembles other Walla Walla soils, however, it is found on much steeper slopes and has greater likelihood of water erosion. This soil type is often used for growing winter and spring small grains and peas. Some areas are used for range land and wildlife habitat.

Soils are further classified into prime and unique soils. Prime soils, as defined by the U.S. Department of Agriculture, are "soils that are best suited to producing food, seed, forage, fiber, and oilseed crops. Such soils have properties that are favorable for the production of sustained high yields of crops" (SCS, 1988). Walla Walla silt loam (114B) is considered prime farmland. This soil type is the predominant soil type that would be affected by Alternatives 2, 3, 5, 6 or 7. These Alternatives would not affect any unique soil types.

### 7.2.7 Cultural Resources

The Umatilla County Comprehensive Plan (Umatilla County Planning Department, 1983) and accompanying resource documents do not list any historic or archeological resources within the project area. An environmental assessment of the preferred route is required as a condition of funding by the Federal Highway.



### **7.2.8 Energy Consequences**

There is no significant discernible difference in energy impacts between Alternatives 2, 3 and 5. All alternatives would establish a two-lane, limited access arterial that would improve access to Pendleton Industrial Park and create an alternate access road to the Airport for emergency vehicles. Motorized vehicles traveling along any of the alternative routes would consume gasoline. The alternatives are similar in length and grade, so vehicles would use the same amount of fuel. A lower-grade access road, such as Alternative 2, 3 or 5, compared to steeper grades found along Alternatives 4 & 7, would help conserve fuel by avoiding the wasteful burning of fuel at intersections and during steeper climbs.

### **7.2.9 Overall Assessment of the Consequences**

Based on the above information, Alternatives 2 & 5 are the only proposed alignments that provide direct, level Interstate access while minimizing impacts to existing land uses. Alternative 3 would require approximately 55% to 65% more land than either Alternatives 2 or 5, would divide the existing field patterns, and have increased construction impacts upon field drainages. Alternatives 4 & 7 do not provide the at-grade access to the Interstate. The only difference between the alternatives 2 and 5 is the increased road costs associated with construction. Only Alternative 5 can be built within the available funding allocation.

*OAR 660-12-0070(8): To address Goal 2, Part II(c)(4), the exception shall:*

- (a) Describe the adverse effects that the proposed transportation improvement is likely to have on the surrounding rural lands and land uses, including increased traffic and pressure for nonfarm or highway oriented development on areas made more accessible by the transportation improvement;*
- (b) Adopt as part of the exception, facility design and land use measures which minimize accessibility of rural lands from the proposed transportation facility or improvement and support continued rural use of surrounding lands.*

#### **Response:**

Adjacent uses are described in detail in Section 3.1. The Airport's general vicinity has a mix of commercial uses, with a few remaining residential areas that are being converted into more compatible industrial uses. The remaining residential areas (mostly low and medium residential uses) occur on land zoned M-1 and occur mainly to the west of the Airport.

Outside of the Pendleton UGB, the land is used for growing wheat. Property near the I-84/Barnhart Road interchange are zoned for higher intensity uses and include primarily light-industrial (LI) areas, with the southeast corner of I-84/Barnhart Road interchange zoned tourist-commercial (TC). There are several small businesses in the vicinity of the interchange.

To minimize potential development on EFU lands along the proposed alignment, the City of Pendleton is prepared to limit future access to this new road by prohibiting non-farm access to the road except within the City's Urban Growth Boundary. This will prevent any new accesses and limit development without first acquiring access from Umatilla County. Additionally, preparation and adoption of the IAMP will help to protect the function of this new road as a limited access roadway, protect the operation of the interchange, and protect the farmland adjacent to this new road. The IAMP will be adopted by Umatilla County, and ODOT.

## **8.0 Economic Development Benefits**

At the request of the CST directors', research and analysis has been conducted to show the economic benefit of constructing a new road between the Airport/Pendleton Industrial Park and Barnhart Road/I-84 Interchange. Economic development information for this analysis was provided by research of the DEA team and technical information provided by Oregon Economic and Development Department.

## **9.0 Goal Exception Summary**

The Findings support the City of Pendleton's request for a goal exception and Comprehensive Plan Amendment to the Umatilla County Comprehensive Plan. The new roadway will provide a much needed second access to the EORA and adjacent industrial lands, will facilitate emergency response to regional natural disaster and security-based events, will enable the city and county to promote general and commercial air service use and enhance the recruitment of new industries to Pendleton. The new roadway will aid in addressing declining intersection functionality at the intersection of Highway 30 and Airport Road.

It has been shown that the preferred alternative 5 complies with the applicable Statewide Planning Goal exception criteria. The alternative analysis of seven different transportation improvements showed that Alternative 5 most closely complied with adopted City and County plans and is mostly likely to meet economic development objectives.

The City of Pendleton and Umatilla County have tentatively agreed to transfer ownership of the roadway and designation of ROW access control to the city after it is constructed. It is recommended that this goal exception application be approved with a condition that the IAMP be adopted by the City, County and ODOT.

## **10.0 Conditional Use Criteria (EFU Zone)**

### **UCDO §152.060 Conditional Uses Permitted**

*In an EFU Zone the following uses may be permitted conditionally via administrative review (§153.769), subject to the requirements of this section, the applicable criteria in §§152.010 through 152.617 and §§152.545 through 152.562. A zoning permit is required following the approval of a conditional use pursuant to §152.025. Existing uses classified as conditional uses and listed in this section may be expanded subject to administrative review and subject to the requirements listed Oregon Administrative Rules, Chapter 660, Division 033.*

*(U) Construction, reconstruction, or widening of highways, roads, bridges or other transportation projects that are: (1) not improvements designated in the Transportation System Plan or (2) not designed and constructed as part of a subdivision or planned development subject to site plan and/or conditional use review, shall comply with the Transportation System Plan and applicable standards, and shall address the following*



*criteria. For State projects that require an Environmental Impact Statement (EIS) or EA (Environmental Assessment), the draft EIS or EA shall be reviewed and used as the basis for findings to comply with the following criteria:*

- (1) *The project is designed to be compatible with existing land use and social patterns, including noise generation, safety and zoning.*

Yes – See ESEE Analysis in Section 7.2

- (2) *The project is designed to minimize avoidable environmental impacts to identified wetlands, wildlife habitat, air and water quality, cultural resources, and scenic qualities.*

Yes – See ESEE Analysis in Section 7.2

- (3) *The project preserves or improves the safety and function of the facility through access management, traffic calming, or other design features.*

Yes – The new road way will improve safety and access.

- (4) *The project includes provision for bicycle and pedestrian circulation as consistent with the comprehensive plan and other requirements of this ordinance.*

Yes – The proposed road design criteria includes shoulders on each side to meet the rural standard for bicycle and pedestrian use.

#### **UCDO §152.061 Standards for all Conditional Uses**

*The following limitations shall apply to all conditional uses in an EFU zone. Uses may be approved only where such uses:*

- (A) *Will not force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; and*  
(B) *Will not significantly increase the cost of accepted farm or forest practices on lands devoted to farm or forest use.*

The application complies with these standards by taking an exception to Goal 3. Access to exiting agricultural parcels will be provided and therefore will not negatively impact farm practices.

### **11.0 Conditions of Approval**

The following goal exception application conditions are recommended to allow for the construction of preferred alternative 5, extension of Stage Gulch Road to I-84 Interchange 202.

#### **1. Agreement Amendment**

Umatilla County and City of Pendleton will promulgate an intergovernmental agreement (IGA) for City ownership of the new connector right-of-way, along with operation and maintenance language, for the section that is not within ODOT jurisdiction.

## **2. Interchange Area Management Plan (IAMP)**

An IAMP has been prepared for the Barnhart Road/I-84 Interchange 202 and the new road extending to the EORA/Pendleton Industrial Park, an adopted by Umatilla County as part of its Transportation System Plan and Comprehensive Plan. The IAMP includes measures to restrict access to right-of-way along the new connector roadway and protect current uses in the area. The IAMP and Access restrictions to right-of-way shall be adopted by the City of Pendleton, Umatilla County and ODOT. Acquisition of right of way and roadway construction may not occur until the IAMP is adopted.

## **3. Access Management**

Access to the new road along the entire new road route between the Airport and the Barnhart Road/I-84 Interchange 202 shall be limited, within the EFU segment, to only approved farm uses.

*ODOT will have access control of the new connector road right-of-way within approximately the first 1,320-feet from the interchange ramps and the City of Pendleton will have access control for the remaining right-of-way located outside the existing urban growth boundary (UGB) and inside the existing UGB. That portion of the new connector roadway inside the City's UGB will have access permitted as per the City's Transportation System Plan.*

*Proposed access limitations to the new connector road within the IAMP area are described in the IAMP. Proposed access limitations to the new connector road right-of-way between the IAMP boundary and the City's UGB are shown in Figure 14.1 attached to these findings. These consist of two access points:*

- 1) access for an existing driveway to the storage bins shown in Figure 14.1, including farm-use access across the new connector road at the same location for access to the land between I-84 and the new connector road;*
- 2) farm-use access across the new connector road at about the mid-point between I-84 and Stage Gulch Road for access to and from land on the north and south of the new connector road;*

*Also, one additional access will be for farm-use access to the Coppinger property across the new connector road, located between NA 5, IAMP Figure 6-1, and the eastern boundary of the Coppinger property.*

*In the IAMP area, farm-use access to the Coppinger property will be at NA4, IAMP Figure 6-1, and full access (without any use restrictions) at NA5.*

## **4. Transportation System Plan Amendment**

UMATILLA COUNTY will amend it's Transportation System Plan as follows:

*Airport Connector Road from I-84 Interchange 202 to Stage Gulch Road-*

*The following policies implement the Goal Exception adopted by Umatilla County to authorize extension of a new connector road across agricultural lands. These policies guide and apply to subsequent land*



use decisions by Umatilla County related to the new connector road and adjoining properties affected by the new connector road shown on the attached Figure 14.1. In addition to articulating policy, the following paragraphs shall be directly applicable to land use proposals or other requests under the purview of Umatilla County and the City of Pendleton involving the new connector road and any adjacent and nearby lands.

1. In 2007, the county adopted a comprehensive plan amendment and goal exception authorizing construction of a new connector road from I-84 Interchange 202 to the Eastern Oregon Regional Airport. The new connector road provides for a new roadway consisting of two 11-foot travel lanes with six-foot shoulders residing within a minimum 80-foot right-of-way with additional right-of-way width for necessary cut / fill slopes.

2. The sole function of the new connector road as it crosses EFU lands is to provide access between I-84 Interchange 202 and properties within the Pendleton UGB at the Regional Airport and Pendleton Industrial Park. Use of Barnhart Road for access to adjoining farmlands for farm uses only is consistent with the function of this roadway.

3. Access to EFU zoned lands along the Barnhart Road Extension shall be limited to access for "farm use" as that term is defined in ORS 215.203. Umatilla County or other road authorities acquiring rights of way for the new connector road across lands zoned for exclusive farm use shall also acquire "other than farm use" access rights consistent with this policy.

4. The presence of the new connector road does not irrevocably commit lands currently protected for farm use to other uses and shall not act as a basis for a comprehensive plan amendment and zone change to other uses pursuant to OAR 660-004-0028 or OAR 660-014-0030.

5. The presence of the new connector road shall not serve as a basis to convert lands subject to an existing Goal 3 exception and located at the I-84 Interchange 202 to other uses or higher intensities of uses.

6. Ownership of the new connector road will be transferred from Umatilla County to the City of Pendleton.

## **5. Limited Access to New Connector Road**

Access to the new connector road may only be allowed for "farm use" as that term is defined in ORS 215.203 for the portion of the new connector road located in EFU land and not inside the City of Pendleton UGB. Access to the new connector road within the EFU lands is not permitted for other uses.

## **6. City of Pendleton Ordinance Adoption**

The City of Pendleton shall adopt the following ordinance:

### An ordinance regulating city ownership of the Barnhart Road Extension

1. In addition to streets within the city limits and urban growth boundary, the City of Pendleton plans to acquire right of way, construct, operate and maintain a new connector road that extends outside the UGB connecting the Pendleton airport area to within approximately 1,320-feet of Interstate 84 Interchange 202.

2. This ordinance regulates city decisions related to the portion of the connector road outside of the city's urban growth boundary, including decisions to acquire or convey rights of way and rights of access or to otherwise authorize access to the connector road from or across lands outside of the city's urban growth boundary. The city adopts these policies to guide its decisions about acquisition of right of way, and rights of access and subsequent ownership and management of the road right of way in order to implement and be consistent with the Umatilla County comprehensive plan and the adopted goal exception authorizing the connector road.

3. The connector road is authorized by adoption of a goal exception and an amendment to the Umatilla County plan as provided for in the Statewide Planning Goals and relevant administrative rules - including the Transportation Planning Rule (OAR 660-012-0070). The provisions of the administrative rule and the county's adopted goal exception specify the function, general location and design of the new connector road. The requirements of the goal exception and county plan also require that limited access be allowed from the connector road to adjoining properties that are zoned by Umatilla County for Exclusive Farm Use.

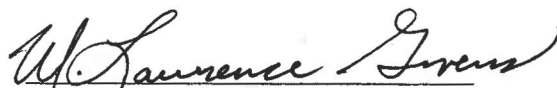
4. It is the policy of the City of Pendleton to construct, manage and operate the connector road and associated right of way consistent with the applicable provisions of the Umatilla County Comprehensive Plan and the adopted goal exception. Consistent with the provisions of the Umatilla County Comprehensive Plan and the adopted goal exception it is the policy of the City of Pendleton to acquire and retain ownership of rights of access to properties along the connector road zoned by the county for Exclusive Farm Use and not to allow driveways or other access to or across adjoining properties except that the city may grant access to adjoining property owners for access for "farm use" as that term is defined in ORS 215.203

**BASED ON THE ABOVE FINDINGS AND CONCLUSIONS, THE UMATILLA COUNTY BOARD OF COMMISSIONERS VOTED 3 TO 0 TO APPROVE THE EXCEPTION AND CONDITIONAL USE REQUEST.**

UMATILLA COUNTY BOARD OF COMMISSIONERS.

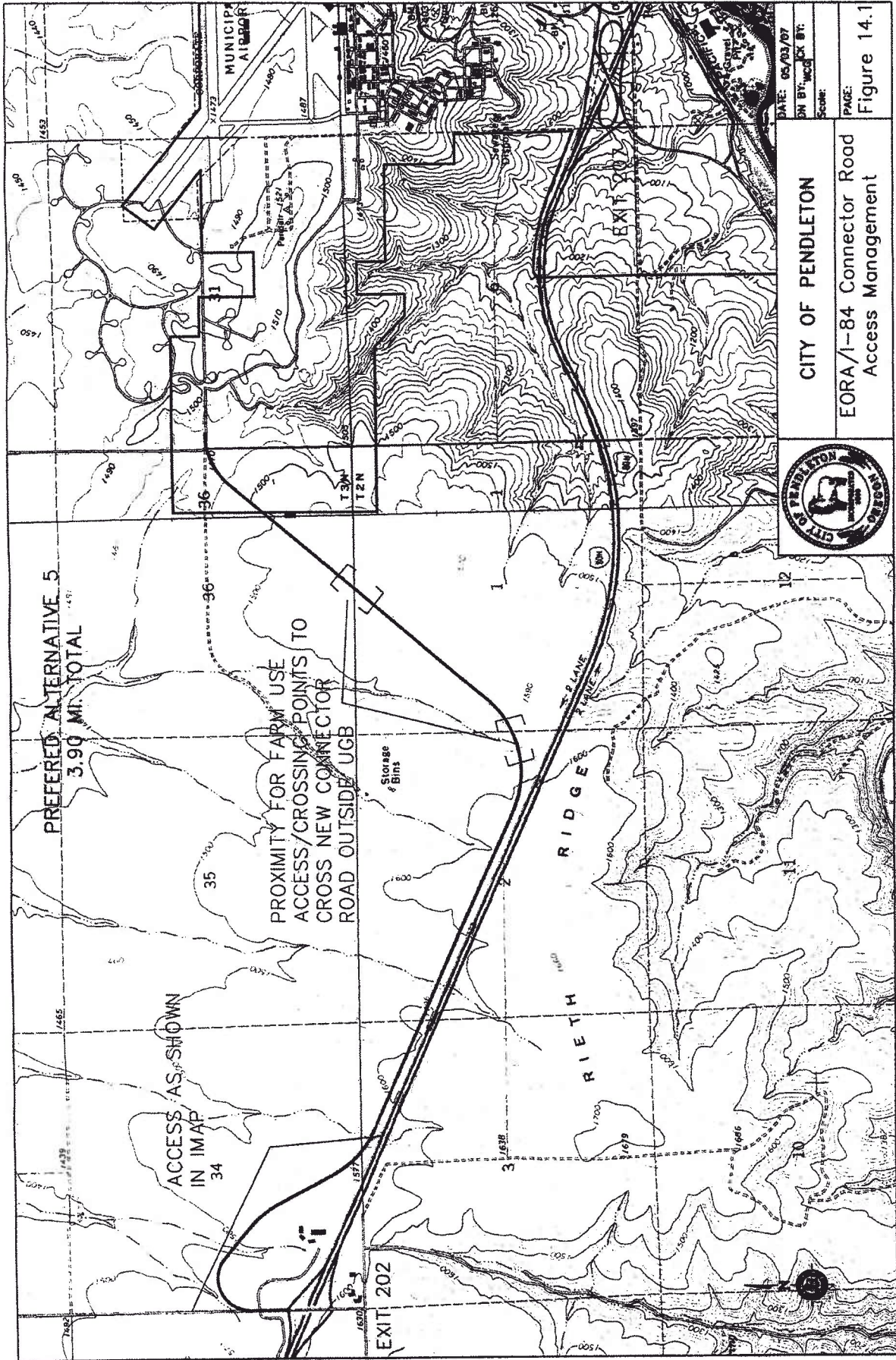
  
Dennis D. Doherty, Chair

  
William S. Hansell, Commissioner

  
W. Lawrence Givens, Commissioner

June 21, 2007  
Date





PREFERRED ALTERNATIVE 5  
3.90 MI. TOTAL

ACCESS AS SHOWN  
IN MAP  
34

PROXIMITY FOR FARM USE  
ACCESS/CROSSING POINTS TO  
CROSS NEW CONNECTOR  
ROAD OUTSIDE UGB

EXIT 202

RIETH RIDGE

MUNICIPAL AIRBOR



CITY OF PENDLETON

EORA/1-84 Connector Road  
Access Management

DATE: 05/03/07  
BY: [signature]  
SCORE:

PAGE:  
Figure 14.1