NOTICE OF ADOPTED AMENDMENT

03/01/2011

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

FROM: Plan Amendment Program Specialist

SUBJECT: City of Gresham Plan Amendment

DLCD File Number 007-10

The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. Due to the size of amended material submitted, a complete copy has not been attached. 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: Wednesday, March 16, 2011

This amendment was submitted to DLCD for review 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 Acknowledgment or 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. NO LUBA Notification to the jurisdiction of an appeal by the deadline, this Plan Amendment is acknowledged.

Cc: Katherine Kelly, City of Gresham
    Gloria Gardiner, DLCD Urban Planning Specialist
    Jennifer Donnelly, DLCD Regional Representative

<paa> YA
### Notice of Adoption

This Form 2 must be mailed to DLCD within 5-Working Days after the Final Ordinance is signed by the public Official Designated by the jurisdiction and all other requirements of ORS 197.615 and OAR 660-018-000.

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<table>
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<th>City of Gresham</th>
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<tr>
<td>Date of Adoption:</td>
<td>2/15/2011</td>
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<tr>
<td>Local file number:</td>
<td>CPA 10-26000267</td>
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**Was a Notice of Proposed Amendment (Form 1) mailed to DLCD?**
- Yes □ No □ Date: 11/26/10

**Comprehensive Plan Text Amendment** □
**Land Use Regulation Amendment** □
**New Land Use Regulation** □

**Summarize the adopted amendment. Do not use technical terms. Do not write “See Attached”**.

Established a refined alignment of the Springwater Interchange and updated the Transportation System Plan (Volume 4 of the Comprehensive Plan) to reflect the new alignment in the Springwater Plan Area.

**Does the Adoption differ from proposal? Please select one**

The adoption does not differ from the proposal.

**Plan Map Changed from:** NA  □
**Zone Map Changed from:**  □

**Location:**

**Specify Density:**

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**Acres Involved:**

**Applicable statewide planning goals:**

|   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |

**Was an Exception Adopted?** □ YES □ NO

**Did DLCD receive a Notice of Proposed Amendment...**

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 □

**DLCD file No:** 007-10 (18585) [16527]
Please list all affected State or Federal Agencies, Local Governments or Special Districts:

ODOT, Multnomah County, Metro

Local Contact: Katherine Kelly, Principal Planner
Address: 1333 NW Eastman Parkway
City: Gresham
Katherine.Kelly@GreshamOregon.gov

ADOPTION SUBMITTAL REQUIREMENTS

This Form 2 must be received by DLCD no later than 5 days after the ordinance has been signed by the public official designated by the jurisdiction to sign the approved ordinance(s) per ORS 197.615 and OAR Chapter 660, Division 18

1. This Form 2 must be submitted by local jurisdictions only (not by applicant).
2. When submitting the adopted amendment, please print a completed copy of Form 2 on light green paper if available.
3. Send this Form 2 and one complete paper copy (documents and maps) of the adopted amendment to the address below.
4. Submittal of this Notice of Adoption must include the final signed ordinance(s), all supporting finding(s), exhibit(s) and any other supplementary information (ORS 197.615).
5. Deadline to appeals to LUBA is calculated twenty-one (21) days from the receipt (postmark date) of adoption (ORS 197.830 to 197.845).
6. In addition to sending the Form 2 - Notice of Adoption to DLCD, please also remember to notify persons who participated in the local hearing and requested notice of the final decision. (ORS 197.615).
7. Submit one complete paper copy via United States Postal Service, Common Carrier or Hand Carried to the DLCD Salem Office and stamped with the incoming date stamp.
8. Please mail the adopted amendment packet to:

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

9. Need More Copies? Please print forms on 8½ -1/2x11 green paper only if available. If you have any questions or would like assistance, please contact your DLCD regional representative or contact the DLCD Salem Office at (503) 373-0050 x238 or e-mail plan.amendments@state.or.us.

http://www.oregon.gov/LCD/forms.shtml

Updated December 16, 2010
ORDINANCE NO. 1703

AN AMENDMENT TO CHAPTER 9 OF VOLUME 4, TRANSPORTATION SYSTEM PLAN, OF THE GRESHAM COMMUNITY DEVELOPMENT PLAN RELATING TO SPRINGWATER TRANSPORTATION SYSTEM PLAN

THE CITY OF GRESHAM DOES ORDAIN AS FOLLOWS:

Section 1. Chapter 9 of Volume 4, Transportation System Plan, of the Gresham Community Development Plan is amended as shown in Exhibit A attached hereto.

Section 2. Chapter 9 of Volume 4, Transportation System Plan, of the Gresham Community Development Plan is amended to adopt "Attachment A: Access to the Springwater Community Interchange Area Management Plan" attached hereto as Exhibit B.

First reading: January 18, 2011

Second reading and passed: February 15, 2011

Yes: Bemis, Fuhrer, Echols, Stegmann, Warr-King, Kilian

No: None

Absent: Widmark

Abstain: None

City Manager

Approved as to Form:

Senior Assistant City Attorney

Mayor
CERTIFICATION OF MAILING

FILE NO.: CPA 10-267

PROJECT: City of Gresham-Springwater Interchange Area Management Plan

I, [Signature], certify that I have mailed the attached Notice of Decision to the following parties:

DLCD
Plan Amendment Specialist
635 Capitol Street, NE #150
Salem, OR 97301-2540

Metro
Growth Management
600 NE Grand
Portland OR 97232-2736

Richard Crampton
8217 SE 267th Avenue
Gresham OR 97080

Max Strasburg
7616 SE 267th
Gresham OR 97080

Michael Partovi
8225 SE Kane Road
Gresham OR 97080

SIGNATURE: [Signature]

DATE OF MAILING: 2/23/2011
NOTICE OF FINAL DECISION

February 23, 2011

On February 23, 2011, the Gresham City Council Approved the application of City of Gresham (Council Order No. 629 and Ordinance No. 1703) amending the Gresham Community Development Plan – Transportation System Plan – regarding the Springwater Interchange Area Management Plan.

The record for this project is maintained at Gresham City Hall, City of Gresham File No. CPA 10-267, and may be reviewed at the City’s Urban Design & Planning office or the Transportation Planning office Monday through Friday, 8:00 AM to 5:00 PM.

An appeal of this decision may be filed with the Land Use Board of Appeals (LUBA) within 21 days of this Notice of Decision. LUBA has the jurisdiction to review all governmental land use decisions. An appeal of a land use decision must conform to the procedures and requirements of LUBA. They may be contacted in Salem at:

LUBA
550 Capitol Street, NE – Suite #235
Salem, Oregon 97301-2552
(503) 373-1265
TRANSPORTATION SYSTEM ALTERNATIVES ANALYSIS

Transportation networks were developed for the three land use alternatives developed during the concept planning process. At that time, the peak hour trips generated with full development of the Springwater area were estimated to range from 9,200 for Alternative A up to 10,800 vehicle trips for Alternative C. These estimates assumed nominal transit services for this area, and could be further reduced with improved transit services or travel demand management programs.

The general features of the initial circulation networks for the three scenarios included:

- **Alternative A**: A central grade-separated interchange on US 26, with two parallel highway overcrossings roughly collinear with Orient Drive-Butler Road and Rugg Road-Stone Road. The local street patterns maintained the north-south grid layout commonly observed in built neighborhoods to the north.

- **Alternative B**: Two at-grade connections on US 26, with one grade-separated overcrossing near Stone Road. The local street grid rotated 45 degrees to mirror the orientation of US 26.

- **Alternative C**: A northern grade-separated interchange on US 26, roughly collinear with Orient Drive, with a new connection along Telford Road to Hogan Drive. Two parallel highway overcrossings to US 26 were located further southeast.

These networks formed the basis for the model networks with the year 2025 travel forecasts. The nature of traffic controls for the at-grade intersection and ramp terminals was not specifically evaluated for each of the scenarios.

**Future Traffic Forecasts**

Metro’s regional 2025 travel demand forecast model (recently used for the RTP update) was determined to be the most appropriate model for this project at the time the alternatives were developed. The Financially Constrained model scenario was adjusted to reflect the mid-level land use alternative for Springwater (Alternative B), and then Metro modeling staff re-ran the trip distribution model to update new travel patterns in the Springwater area. In addition, the model was refined to provide a greater level of street network detail in the Springwater area for a future base condition as well as the three conceptual street networks (with their associated land use patterns). The land use assumptions applied in the travel demand forecasts for Springwater are summarized for households (HH), retail employment (RET) and other employment (OTH), as shown in Table 5.

---

1 The Concept Planning process and the three Concept Plan scenarios are described in more detail in the Springwater Community Plan Report Summary (Springwater Community Plan Volume I)
functionality of the on-site circulation system. Therefore, it was recommended that a hybrid circulation system be developed to support the preferred land use plan that incorporates the best parts of the circulation alternatives. Some general observations that were considered in formulating the preferred alternative circulation system include:

- Alternative A provides only one east-west arterial, while Alternatives B and C each provide two. Typically arterials are spaced at approximately one-mile intervals. The core portion of the Springwater study area is about one-mile in the north-south direction and about 2 1/2 miles in the east-west direction. Either one or two east-west arterials could function adequately, given the density and location of development within Springwater.

- Alternative C locates the interchange with US 26 toward to the north end of Springwater, providing highway access closer to the urban area where demand is anticipated. Alternative A provides US 26 interchange access centrally located to Springwater, but does not functionally serve urban development further north.

- Alternative B does not include interchange access with US 26, thereby slowing traffic (e.g., roundabouts) or stopping traffic (e.g., traffic signals) on US 26 as it heads south out of the study area.

- Regardless of the alternative, additional capacity is needed for north-south travel through Gresham and East County, either in the form of widening existing facilities (i.e., US 26) or by providing additional capacity through access control and/or new routes.

- Since so much traffic is traveling to and from the south, additional inter-regional capacity is needed between Springwater and areas south (i.e. Damascus-Boring).

RECOMMENDED TRANSPORTATION SYSTEM PLAN

Motor Vehicle Plan

The motor vehicle plan for Springwater connects employment and residential neighborhoods to the regional arterial and highway facilities to provide safe and convenient access for future residents and workers. The existing arterial facilities such as Palmquist Road, Orient Drive, and 242rd Avenue form the framework for travel around and through this area. A new arterial is recommended to provide east-west circulation within the community, and to provide access to US 26.

The new arterial route begins along existing Orient Drive, then bends south to form a new four-way intersection within Springwater. This functional change will help to reduce travel speeds on Orient Drive to be more compatible with existing residential uses. A new arterial would continue south then southwesterly across US 26 to connect to Rugg Road and 242nd Avenue. This new arterial route is expected to be the primary link for employment circulation within Springwater, and it is also expected to serve regional traffic for connections to and from US 26. The other new arterial collector crosses US 26 to the north, and connects to Telford and McNutt Roads and the middle of the Village Center area west of 252nd Avenue.

The new residential neighborhoods east of 242nd Avenue include the Village Center area opposite to Butler Road. This area will be served by a series of collector streets and one neighborhood connector, as shown in Figure 1. The looping neighborhood connector alignment reduces the number of stream crossings, and still provides convenient connections from the residential neighborhoods to 242nd Avenue and the Village Center. The proposed functional classifications are consistent with the adopted Gresham Transportation System Plan

Transportation System Plan
Council Bill No. 04-11 Exhibit A

Springwater Community Plan
1-18-2010
Council Bill 04-11 Exhibit A – Amendment to Chapter 9 of Volume 4, Transportation System Plan, of the Gresham Community Development Plan

Transportation System Plan. The exception is the designated Neighborhood Connector route, which has the same design profile as a Community Street, but allows for future traffic calming measures to be deployed, as the need arises.
Funding program needs for the City of Gresham and the addition of transportation improvements to the project list.

These elements are described in more detail later in this TSP.

New or modified street connections to County facilities (e.g., 242nd Avenue, 282nd Avenue) will require compliance with appropriate spacing and design standards. One specific consideration for streets on the Urban Growth Boundary edge, especially 282nd Avenue, is that urban improvements will be built on the Springwater site only. The rural edge of these street facilities will be left intact on the side fronting the rural protect lands.

US26 Improvements

This section summarizes findings from the Springwater US 26 Concept Design and Access Study (CDAS) was prepared-completed in 2005 under a separate planning document (included in the Reference Documents). The study focused on alternative access concepts to US 26 to support Springwater as it develops over the next twenty years. The development assumptions and travel forecasting process were coordinated with the Springwater Master Plan development process so that the same assumptions and methods were applied for both studies. The 2025 travel forecasts were made using the same Metro model that was applied for Springwater. More detail was provided to describe the various network alternatives used in this study, but, overall, the same base model was applied. A wide range of alternative highway connections were investigated for Springwater, including at-grade intersections controlled by traffic signals, and several variations of grade separated interchanges. The alternatives were developed with consideration of applicable mobility, safety and design standards that are adopted by ODOT and the City of Gresham. One of the critical elements of this concept design process considered the minimum spacing between adjacent traffic signals or interchanges and the proximity to major environmental constraints, so that the proposed alternatives were consistent with standards and generally considered feasible to construct. The concept design alternatives were evaluated using 2025 traffic conditions to assess how successful they performed relative to the applicable automobile and freight mobility standards. A comparative matrix evaluation showed the relative merits and impacts for each alternative, in terms of compliance with standards, performance and potential impacts to the environment.

Based on the CDAS, the recommended plan alternative for Springwater was a new US 26 interchange at the southern arterial, which connects to Rugg Road on the west and Orient Drive on the east. Prior to the construction of the major interchange such as the one recommended via the CDAS, an Interchange Area Management Plan (IAMP), is required. That process includes coordination between the Oregon Department of Transportation (ODOT) and local agencies to address transportation and land use needs within the interchange area. It evaluates multiple interchange design concepts and recommends one interchange design concept for further engineering design. In 2007 a US26 Springwater IAMP team was formed. The team included stakeholders from ODOT, the Cities of Gresham and Damascus, as well as Clackamas and Multnomah counties. Following an inventory of existing conditions, the project purpose and need plus goals and objectives were developed. Additionally, interchange alignments were conceptualized and screened against selection criteria that had been developed. Public outreach was conducted throughout this process. In September 2010 the Project Management Team selected a preferred alternative. Attachment A, the IAMP, provides detailed information about the process and preferred alternative for access from US 26 to Springwater, the necessary environmental reviews, facilities design and approval and project funding need to be completed.

The initial concept design will be further refined to address any identified impacts or issues identified through these further studies. Interim steps for access and circulation to and from US 26 in the
Springwater area were identified in the following phases. Where appropriate, potential thresholds for development triggers in Springwater have been identified, however, a specific evaluation will be required at the time of development application to confirm the need and timing of interim improvements.

**POTENTIAL US 26 CORRIDOR CONSTRUCTION PHASING**

The potential construction phasing of improvements to the US 26 corridor and Springwater roadway network must support the transportation demand as the Springwater community develops. In general the US 26 corridor will be developed from north to south, as shown in Figure 5-6 and will tentatively utilize Proposed Collector A as a temporary connection to US 26 until the transportation demand support building the Proposed Arterial-B interchange as the permanent connection to US 26. However, development of the Proposed Arterials A and B plus the Overcrossing and Interchange, may happen before development of the local road system due to federal and state funding opportunities. Figure 5-6 illustrates the following potential construction phasing for the recommended US 26 corridor concept that is described in more detail in this section:

- **Phase I A:** Stop Control at Proposed Collector A
- **Phase I B:** Traffic Signal at Proposed Collector A
- **Phase 2 A:** Build Proposed Arterial-B Interchange
- **Phase 2 B:** Build Proposed Collector A Overcrossing

The phasing of access improvements to US 26 will need to be addressed at a higher level of detail in the NEPA process and preliminary engineering. This additional analysis may lead to changes in the phasing shown in this report. **Phase 1 A: Stop Control at Proposed Collector A**

Phase 1 A includes the following potential construction elements:

- Construct Proposed Collector A, including a bridge over Johnson Creek, as an at-grade intersection with US 26 just south of the wide median on US 26. This also includes an at-grade intersection with Telford Road and the Springwater Trail.
- Install stop signs on the Proposed Collector A approaches to the US 26/Proposed Collector A intersection.
- Use the lane configuration illustrated in Figure 5-6, which includes one dedicated left and right turn lane and two through lanes on both US 26 approaches as well as one dedicated left turn lane and one shared through/right lane on both Proposed Collector A approaches. An additional dedicated left turn lane and through lane should be added to both Proposed Collector A approaches for the installation of a traffic signal (see Phase 1 B) since this geometry will maximize the life span of the intersection.
- Install underground electrical conduit to accommodate the installation of a traffic signal at the US 26/Proposed Collector A intersection (see Phase 1 B).
- Close the US 26/267th Avenue intersection upon the completion of the US 26/Proposed Collector A intersection.
- Keep the US 26/Hillyard Road and US 26/Stone Road intersections open.

**Phase 1 B: Traffic Signal at Proposed Collector A**

Phase 1 B includes the following potential construction elements:

- Construct a traffic signal at the US 26/Proposed Collector A intersection. Maintain the lane geometry constructed during Phase 1 A and open the additional dedicated left turn lane and through lane on both Proposed Collector A approaches.
- Construct visual indicators on US 26 to cue motorists to the presence of a traffic signal. Specific design elements will be determined by ODOT during the design of the traffic signal and may include vertical elements such as raised curbs and roadway illumination that provide a more urban feel.
- Keep the US 26/Hillyard Road and US 26/Stone Road intersections open.
Council Bill 04-11 Exhibit A – Amendment to Chapter 9 of Volume 4, Transportation System Plan, of the Gresham Community Development Plan

**Phase 2A: Build Proposed Arterial B Interchange**
Phase 2A includes the following potential construction elements:

- Construct Proposed Arterial B and the interchange at US 26. This also includes grade-separation at Telford Road and the Springwater Trail and a bridge at Johnson Creek. Install traffic signals at the ramp terminals if they are warranted within three years of the interchange completion. Install stop signs at the ramp terminals if traffic signals are not warranted.
- Keep the US 26/Stone Road intersection open during construction of the interchange for as long as feasible.
- Keep the US 26/Hillyard Road intersection open during this phase.
- Maintain the traffic signal at the US 26/Proposed Collector A intersection.

**Phase 2B: Build Proposed Collector A Overpass**
Phase 2B includes the following potential construction elements:

- Close the US 26/Proposed Collector A, US 26/Hillyard Road, and US 26/Stone Road intersections at the completion of Phase 2A. These intersections will no longer meet access spacing standards once the interchange is operational.
- Remove the traffic signal at US 26/Proposed Collector A.
- Realign southbound US 26 at the north end of Springwater to reduce the median separation between southbound and northbound US 26 to 16 feet, which is the current ODOT standard for US 26. By saving this realignment until the last phase it provides more flexibility for detours, lane closures, or construction staging during the earlier phases.
- Construct the Proposed Collector A overcrossing at US 26.

It will be important for development to recognize the shift in access over time within Springwater. During the early years, primary access will be to and from the northern Collector; however, eventually, this connection to US 26 will be close (Phase 3), and these circulation replaced by the new interchange located at the southern Arterial.

**Amendment to Street Functional Class Map and Plan Designations**

The city street designations in the Gresham Transportation System Plan were applied to the Springwater Master Plan area. The street design type designations and cross-section elements were taken from the Pleasant Valley Plan area, since it is the most recent new development that incorporates Green Street components into new street designs. The proposed Street Functional Class Plan for the Springwater Master Plan area was illustrated in Figure 1.

The key arterial connections for Springwater include US 26, 242nd Avenue, Orient Drive, Kane Road and Rugg Road. The existing alignment of Orient Drive changes to create a new four-way intersection just east of 267th Avenue. This change is intended to separate urban travel to and from
For all phases, estimated construction cost for the ultimate US 26 connection improvements was $24.5 million. Cost estimates will be re-evaluated as part of the City of Gresham’s TSP Update between 2010 and 2012. Once the preferred US 26 improvement project has been adopted, the specific nature and expected construction costs should be incorporated into the Gresham TSP, the updated TSP and the Metro RTP as appropriate.

Several existing streets bordering Springwater require improvements in the long-term to support planned growth. These include the projects numbered 27 through 30 shown in Table 8. Of these, Telford Road is the only street that traverses the planning area; the other streets border the site. The total estimated cost for improvements on these facilities is $38 million. Most of these projects will be constructed in a 6-20 year timeframe; however some would be required to support likely initial development in the northern part of the study area adjacent to US 26 and Telford Road. These are shown as occurring in a 1-5 year timeframe. All of the recommended improvements for Springwater are eligible for funding using system development charges (SDCs), however the City should investigate opportunities to obtain federal, state, or private funding to augment local funding of transportation improvements.

Outstanding Issues

The improvements identified above do not address the off-site system improvements required to service long-term travel demands, particularly in the north-south arterial corridors. The North/South Transportation Study (also known as the East Metro Area Telecommunications and Transportation Assessment) is evaluating the need for enhanced services or new facilities. A Metro region corridor refinement plan, the East Metro Connections Plan (EMCP), is scheduled to be complete by the end of 2013. That plan and subsequent regional studies are to address recommended capacity, mobility, and access improvements through and within the jurisdictions of Gresham East Multnomah County (including additional needs associated with Springwater and Damascus development). Preliminary findings from that study show the need for substantially more north-south carrying capacity, which could include upgrading existing arterials to higher quality of service, and implementing a high-capacity transit solution between Damascus and Interstate 84. The implications for Springwater potentially include a much higher level of traffic for the connector between 242nd Avenue and US 26 (Projects 2 and 3), and potentially a wider right-of-way requirement on 242nd Avenue (or other parallel north-south route) for high-capacity transit service. Based on this study, the outcomes of the EMCP, the City’s Transportation System Plan update and Metro’s Regional Transportation Plan update provide forums to continue to address off-site improvements beyond the Springwater Plan TSP will be updated to reflect necessary improvements, including any necessary improvements in the Springwater area.

Local Street Connectivity Map

Overall, local street planning for Springwater incorporates the on-site circulation requirements to support the intended land use development schemes, and is designed to provide key connections for low volume circulation between neighborhoods for automobiles, bicycles and pedestrians alike. A better connected street and trail system helps to reduce out-of-direction travel for all modes of transportation, and it also complies with requirements as described in Title 6 of the Regional Transportation Plan.

The local street network in Gresham bordering the Springwater area is developed along the northern face, on either side of US 26, and portions of the western face along 242nd Avenue, north of Butler Road. The southern and eastern faces of the Springwater planning area border the Urban Growth Boundary and local street extensions are not expected with the current designations. Development of local streets within Springwater will be consistent with standards adopted by the City of Gresham for spacing, sight distance
Council Bill 04-11 Exhibit A – Amendment to Chapter 9 of Volume 4, Transportation System Plan, of the Gresham Community Development Plan

Table 9 (Continued): Springwater TSP Projects

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Total Transportation Projects

$190,303,000

Grant Funding

Grant funding could be used to offset the cost of transportation improvements. Over the past 10 years, the City of Gresham has averaged approximately $1 million per year in transportation capital grants from various sources. A specific estimate has not been made as to how much grant funding will be available to offset the cost of transportation improvements.

Developer Exactions

Developer exactions are applied to transportation improvements (usually frontage improvements) that developers are required to construct in order to develop their land. These most often apply to internal local streets.

TSP IMPLEMENTATION ACTIONS

The following actions are required to implement the Springwater TSP:

1. Continue to participate with other regional service providers to advance concepts from the North/South Transportation Plan regional and local plans to fully develop alternatives, develop a recommended plan, and identify and execute implementation measures to improve access between Springwater and major transportation routes such as I-205 and I-84.
2. Refine the Green Street concepts from this TSP and the Stormwater Master Plan as required to fully implement Green Street development in Springwater.
3. Implement a Transportation Impact Fee to adequately fund growth-related improvements in Springwater.
4. Continue to work with the Oregon Department of Transportation to develop plans for improved access to US 26 through Springwater.
5. Consider including conduit with future roadway improvements in Springwater to serve telecommunication needs in the area.
Access to the Springwater Community Interchange Area Management Plan

PREPARED FOR
Oregon Department of Transportation, Region 1
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Portland, OR 97209

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DRAFT
NOVEMBER 2010
US 26: Access to the Springwater Community Interchange Area Management Plan
DRAFT

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ACKNOWLEDGEMENTS

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Kathy Majidi, Watershed Division
Jean Harrison, Graphic Information
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City of Damascus
Steve Gaschler, Public Works Director

Parametrix
Jason Franklin, Project Manager
Quinn Fahey, Planner

Kittelson & Associates, Inc.
Wade Scarbrough, Traffic and Transportation Engineer
## TABLE OF CONTENTS

### SECTION 1: INTERCHANGE AREA MANAGEMENT PLAN

- Introduction .................................................. 7
- Project Background ............................................ 7
- IAMP Purpose and Intent .................................... 8
- Need for the Springwater Interchange .................... 8
- Interchange Function ......................................... 9
- IAMP Goals and Criteria .................................... 9
- Springwater Management Area .............................. 11

### SECTION 2: IAMP DECISIONS

- Existing Land Use ........................................... 12
- Planned Land Use ............................................ 12
- Existing Traffic Performance .............................. 19
- Future (2030) No-Build Traffic Performance ........... 21
- Planned Transportation Network .......................... 21
- Alternative C-2 Interchange ............................... 22
- Local Street Network ........................................ 24
- Local Access and Circulation Plan ....................... 24

### SECTION 3. IMPLEMENTATION AND ADOPTION

- IAMP Adoption .................................................. 33

### SECTION 4. CONSISTENCY WITH GOALS AND CRITERIA

- 35

### SECTION 5. COMPATIBILITY AND COMPLIANCE

- City of Gresham ............................................... 36
- Multnomah County .......................................... 36
- Transportation Planning Rule .............................. 36

### SECTION 6. MONITORING AND UPDATES

- 37
TABLE OF CONTENTS (CONTINUED)

LIST OF EXHIBITS
Exhibit 1. Management Area ........................................................... 11
Exhibit 2. Map of Alternative C-2 .................................................. 13
Exhibit 3. Map of Interim Alternative C-2 ...................................... 15
Exhibit 4. Current Zoning ............................................................... 17
Exhibit 5. Planned Zoning ............................................................... 18
Exhibit 6. Measured Peak Season Average Daily Traffic (Seasonally Adjusted) .................................................. 15
Exhibit 7. US 26 Crash History by Type and Severity (2005–2009) .................................................. 20
Exhibit 9. Intersection Analysis Results, 2030 No-Build Design Hour Traffic Condition .............. 21
Exhibit 10. Intersection Analysis Results, Projected 2035 Design Hour Traffic Condition ........... 23
Exhibit 11. Minimum Spacing Standards Applicable to Freeway Interchanges with Multi-Lane Crossroads (OHP Table 19) .................................................. 24
Exhibit 12. Measurement of Spacing Standards ................................ 25
Exhibit 13. City of Gresham Minimum Access Spacing Standard ................................................. 25
Exhibit 14. Proposed Local Circulation Plan ..................................... 31

APPENDICES (NOTE: THESE DOCUMENTS ARE AVAILABLE UPON REQUEST AND A COPY IS LOCATED IN THE CITY HALL COUNCIL OFFICE).

A  Environmental Criteria Technical Memorandum
B  Evaluation Matrix
C  Alternatives Analysis
C-2  Map of Alternative A
C-3  Map of Alternative B
C-4  Map of Alternative C-2
C-5:  Stone Road Memo
D  Existing and Planned Management Area Zoning
E  Existing Conditions Traffic Memorandum
F  Alternative C-2 Traffic Analysis
G  Review of Plans and Policies
H  Public and Stakeholder Involvement
SECTION 1. INTERCHANGE AREA MANAGEMENT PLAN

INTRODUCTION

The Springwater Community Plan Area (Springwater area) contains over 1,000 acres of land that the City of Gresham plans to develop into an industrial employment center, eventually attracting thousands of jobs. In order to serve this new employment center, the City and the Oregon Department of Transportation (ODOT) embarked on a process to design an interchange to provide better access to the Springwater Area. Three interchange alternatives were developed, along with three interim improvement options that would allow for some development if full funding is not initially available for the ultimate interchange. After extensive public involvement and evaluation, Alternative C-2 was selected as the preferred alternative. The alternative is an urban diamond interchange configuration that will provide safer and more efficient traffic movements to the Springwater area. Interim improvements would be phased with an overcrossing of US 26 extending to Telford Road, with connections between the overcrossing and US 26. In addition, Alternative C-2 includes an elevated crossing of the Springwater Corridor Trail, a regionally significant multi-use trail.

PROJECT BACKGROUND

In December 2002, Metro brought the approximately 1,200-acre Springwater area into the Metro area Urban Growth Boundary (UGB). The area is currently under Multnomah County jurisdiction and is planned to eventually be annexed into and urbanized by the City of Gresham. The intent of the Springwater expansion was to bring high-value, family-wage jobs to the City of Gresham by developing industrial/high-tech campuses and attracting businesses that would bring an infusion of thousands of new jobs. The City also planned for a village center with mixed retail and housing, and quality, low-density residential development in the Springwater area.

As required by state planning laws, the City of Gresham developed the Springwater Community Plan between 2003 and 2005 in partnership with residents and property owners, area stakeholders, and other jurisdictions. The Springwater Transportation System Plan (TSP) is a component of the Springwater Community Plan, which was adopted by the Gresham City Council in 2005. In the Springwater TSP, the City of Gresham recommended a new interchange with US 26 and proposed enhancements to the local street network to provide safe and efficient access to the planned Springwater area while preserving the expressway function of US 26. Included in the Springwater Community Plan is an annexation strategy that guides urbanization and the provision of infrastructure, including the Springwater interchange.

This Interchange Area Management Plan (IAMP) identifies the type and location of the preferred interchange alternative, including:

1) A collector street that connects roughly SE 252nd Avenue to a new arterial road connecting to SE Orient Drive;

2) A new arterial road that connects along SE Rugg Road in the vicinity of SE 252nd Avenue and over US 26 via an interchange to SE Orient Drive; and
3) An interchange facility at US 26 and approximately SE 267th Avenue.

Additionally, the IAMP describes access management requirements and outlines guidelines for implementation.

**IAMP PURPOSE AND INTENT**

The purpose of the Springwater IAMP is to address existing and future safety needs, improve access to the existing transportation system, and provide for a future transportation network that will efficiently accommodate the planned development in the Springwater area, while preserving the function of US 26.

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

OAR 734-051-0155(7) requires an IAMP to comply with the following criteria, unless the plan documents explain why compliance with a criterion is not applicable:

a. Be developed no later than the time an interchange is designed or is being redesigned.

b. Identify opportunities to improve operations and safety in conjunction with roadway projects and property development or redevelopment, and adopt policies, provisions, and development standards to capture those opportunities.

c. Include short, medium, and long-range actions to improve operations and safety within the designated management area.

d. Consider current and future traffic volumes and flows, roadway geometry, traffic control devices, current and planned land uses and zoning, and the location of all current and planned approaches.

e. Provide adequate assurance of the safe operation of the facility through the design traffic forecast period, typically 20 years.

f. Consider existing and proposed uses of all the property within the designated management area consistent with its comprehensive plan designation and zoning.

g. Be consistent with any applicable access management plan (AMP), corridor plan, or other facility plan adopted by the Oregon Transportation Commission (OTC).

h. Include policies, provisions, and standards from local comprehensive plans, transportation system plans, and land use and subdivision codes that are relied upon for consistency and that are relied upon to implement the Interchange Area Management Plan.

In addition to the IAMP, other work products related to the Springwater interchange include environmental technical memoranda, an AMP, design work, and an analysis of local circulation patterns. This project will result in updates to the Gresham TSP.

**NEED FOR THE SPRINGWATER INTERCHANGE**

Traffic volumes on US 26 are projected to nearly double by 2035 due to development in the Springwater area as well as other growth and development in the region. This additional demand will further compromise the already poor conditions at the SE 267th Avenue and SE Stone Road at-grade intersections.
with US 26. The Springwater area requires improved access to US 26 and improvements to the surrounding transportation network to support planned urban land uses.

**INTERCHANGE FUNCTION**

The objective of the Springwater IAMP is to address existing and future safety needs, improve access to the existing transportation system, and provide for a future transportation network that efficiently accommodates the planned development in the Springwater area, while preserving the function of US 26. US 26 is a divided, multi-lane expressway from the southern city limits of Gresham to the city limits of Sandy. The highway is classified in the Oregon Highway Plan (OHP) as a highway of statewide importance and is part of the national highway system in addition to being an identified freight route. Its function is to provide inter-urban and inter-regional mobility and provide connections to larger urban areas, ports, and major recreation areas that are not directly served by interstate highways. A secondary function is to provide connections for intra-urban and intra-regional trips.

The Springwater interchange will be located in proximity to SE 26th Avenue intersection. Its transportation function is to provide statewide and regional access to new industrial land uses in Springwater. The interchange is a service interchange, providing connections from US 26 to local arterials.

With respect to land use and development, the function of the Springwater interchange is to serve planned land uses in the Interchange Management Area. It is not the function of the interchange to facilitate further urbanization of resource lands or land that is not otherwise identified for future development in existing comprehensive plans, as listed above. It is not the function of the Springwater IAMP to facilitate development that is not identified in the Gresham Comprehensive Plan.

**IAMP GOALS AND CRITERIA**

The Project Management Team (PMT), consisting of representatives from ODOT, City of Gresham, City of Damascus, Multnomah County, and consulting firms Parametrix and Kittelson & Associates, Inc., first met in 2007 to draft the project’s purpose and intent. Using the project’s purpose and intent statement as guidance, the PMT then developed goals, criteria, and measures to score project alternatives.

Over the course of about two years, the PMT added, deleted, and refined the goals, criteria, and measures to ensure that the evaluation process accurately and fairly compared the alternatives against one another. The PMT sought input on the goals from numerous stakeholders, including residents, realtors, the East Metro Economic Alliance, Johnson Creek Watershed Council (JCWC), Audubon Society of Portland, Portland Parks and Recreation, Metro.

After meeting with these groups, the PMT made substantive changes to the environmental (Goal 3) and development/livability (Goal 4) goals. Based on input from the JCWC and Audubon Society, the PMT, along with consulting firm Pacific Habitat Services and scientists from Parametrix, revised and added environmental measures to assess impacts to streams, wetlands, riparian resources, water quality, and habitat within the project area. A technical memorandum describing the environmental analysis and impacts is located in Appendix A. Based on input from residents, the PMT altered a measure to address potential impacts to existing neighborhoods.

The project goals and their corresponding criteria are listed below. For a complete matrix, including the scoring measures, please see Appendix B.

**GOAL 1: Improves access and capacity for all modes of transportation in the Springwater area.**

Improves connectivity to the existing and planned bicycle, pedestrian, trail, and street networks

---

1 The meeting with Portland Parks and Recreation was held to discuss implications of the project for the Springwater Trail; Portland Parks and Recreation owns the stretch of trail that runs through the management area.
Improves transportation safety
Crossroads meet state spacing standards
Provides adequate capacity

GOAL 2: Maintains mobility for statewide movements along US 26.
Interchange meets state spacing standards
Provides adequate capacity

GOAL 3: Minimizes impacts to the natural environment and provides opportunities for enhancement.
Adheres to the restoration goals of the Springwater Community Plan, while avoiding or reducing
impacts to wetlands, streams, and the natural environment

GOAL 4: Increases the viability of development within the Springwater area while supporting community
livability.
Supports transportation and land use objectives articulated in adopted plans
Maintains developable parcels

GOAL 5: Ensures financial feasibility of the interchange and local circulation options.
Supports lower cost projects while providing a safe and efficient facility.

SPRINGWATER MANAGEMENT AREA
The IAMP management area is the area where access and circulation may influence the safety and
operation of the interchange. Within the management area, local circulation and access are evaluated for
impacts.

The management area for the Springwater IAMP is bounded to the north by SE Palmquist Road, to the
east generally by SE Orient Drive and SE 282nd Avenue, to the south generally by SE Stone Road and SE
Rugg Road, and to the west by SE 252nd Avenue and SE Palmblad Road (Exhibit 1). The management
area includes 1,311 acres.

The planned location for the interchange is southeast of the existing US 26/SE 267th Avenue intersection
and northwest of the existing US 26/SE Stone Road intersection. As part of the planned interchange, a
new east-west arterial is also proposed for the Springwater area, connecting the areas on the east and west

The management area spans four jurisdictions. A small segment of the northern portion of the
management area is within Gresham city limits; a majority of the management area is outside of city
limits in Multnomah County; a small area in the southwest portion is within the City of Damascus; and a
small area in the southeast is within Clackamas County. The portion in Multnomah County is planned for
incorporation into the City of Gresham to implement the urbanization of the plan area.
SECTION 2. IAMP DECISIONS

The PMT first met in 2007 to draft the project’s purpose and intent, and later, the project’s goals, criteria, and measures. With the project’s foundation established, the PMT held a design workshop to discuss several options for interchange locations and designs along US 26. This effort resulted in seven different alternatives.

Once the seven alternatives were developed, the PMT screened the alternatives to determine which options best satisfied the project’s purpose and intent. Three alternatives then advanced to the evaluation phase: Alternative A, Alternative B, and Alternative C-2, with Alternative C-2 emerging as the preferred alternative. For more information on the alternatives screening and analysis process, please see Appendix C.

Alternative C-2 is an urban diamond configuration (Exhibit 2). The Springwater Trail would be elevated above the proposed arterial once the arterial is constructed with five lanes. If funding is not available to build the complete interchange, Alternative C-2 would be phased with an overcrossing of US 26 extending to SE Telford Road, with connections between the overcrossing and US 26 (Exhibit 3).

EXISTING LAND USE

When evaluating land uses, the management area can be broken into two parts: the developed, urban portion within the City of Gresham, and the rural portion within Multnomah and Clackamas Counties and the City of Damascus. The urban portion within Gresham is primarily zoned as Residential, with some Commercial. The Multnomah and Clackamas County portion is mainly zoned as Multiple Use Agriculture and Exclusive Farm Use. The City of Damascus zoning is primarily Rural Residential Farm, with some Timber. Please see Exhibit 4 for a map of current zoning in the management area and Appendix D for a description of all zones within the management area. The zones represented in Exhibit 4 were simplified for the purposes of the map (i.e., Low Density Residential-7 is referred to as Residential in the map), but are explained in detail in Appendix D.

Johnson Creek and its associated riparian area and tributaries are in the south central portion of the management area. The regional Springwater Trail also runs through the management area adjacent to SE Telford Road, near US 26.

PLANNED LAND USE

The City of Gresham prepared the Springwater Community Plan in 2005 to address development and transportation needs in the Springwater area. The focus of the plan is to develop industrial/high-tech campuses and to attract businesses that will bring an infusion of new jobs to the Springwater area. To augment the mixed-use theme of the area, a village center with mixed retail and housing, and quality, low-density residential development are also planned for areas too steep for industrial use. Sustainable development and preservation of the natural environment will also be emphasized, giving the area a unique character. Future land use zones in the management area include Environmentally Sensitive/Restoration Areas, Townhouse Residential, Neighborhood Commercial, and Research/Technology Industrial. Please see Exhibit 5 for a map of planned land uses in the management area. These planned land uses will be realized when the Springwater area is incorporated into the City of Gresham. This page intentionally left blank.

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2 Alternative C-2 is named so because it was the second version of Alternative C.
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Exhibit 3
Springwater IAMP
Interim Alternative C-2
Gresham, Oregon
EXISTING TRAFFIC PERFORMANCE

Traffic data were collected during May 2007 on US 26, approximately 300 feet south of SE 267th Avenue. The data included turning movement counts at the study intersections, as well as a 7-day tube count.

Highways serving tourist and recreational destinations are often prone to seasonal fluctuations in traffic volumes. In the case of US 26, skiing and other recreational activities in the Mount Hood area create peaks in the traffic volumes during the winter and summer months. Using the methodology outlined by ODOT’s Transportation Planning Analysis Unit, a seasonal adjustment factor of 1.05 was calculated for the mid-May traffic count data. The adjustment factor was applied to the collected tube count data and turning movement count data on US 26 to represent the 30th highest hour yearly volume, or the design hour volume. Exhibit 6 summarizes the peak season weekday and weekend average daily traffic (ADT) with the seasonal adjustment.

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Direction</th>
<th>Weekday ADT (veh/day)</th>
<th>Weekend ADT (veh/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 26</td>
<td>Westbound (Northbound)</td>
<td>13,900</td>
<td>11,900</td>
</tr>
<tr>
<td></td>
<td>Eastbound (Southbound)</td>
<td>13,200</td>
<td>10,800</td>
</tr>
</tbody>
</table>

The following key transportation findings are based on the Springwater IAMP Existing Transportation Conditions Technical Memorandum (Appendix E). The analysis resulted in the following findings:

- Current pedestrian and bicycle facilities along US 26 are consistent with the rural expressway character of the highway. Many of the arterials and collector roadways in the Springwater area do not currently have continuous pedestrian or bicycle facilities. As these existing rural areas transition to urbanized areas, pedestrian and bicycle facilities will be required for the surrounding arterial and collector streets.

- All study intersections are currently operating acceptably during the weekday a.m. and p.m. peak periods, with the exception of the US 26/SE 267th Avenue intersection. The existing deficiency at this intersection occurs at the minor street approach, which has a volume-to-capacity (V/C) ratio of 1.42 (exceeding ODOT’s standard of 0.95).

- Based on a review of intersection geometry and operational performance, freight mobility on US 26 within the management area is sufficient.

- The traffic safety analysis indicates that there may be a trend or pattern of rear-end crashes at the US 26/OR 212 interchange (in particular, the eastbound US 26 ramp terminal), while the remaining study intersections did not exhibit any apparent crash patterns. None of the intersections or highway segments in the management area were identified on ODOT’s Five Percent Report, based on the 2010 Safety Priority Index System (SPIS).

- There are two locations along US 26 that do not meet access spacing standards defined in the 1999 OHP and the OAR 734-051 Division 51 rules. These locations are the US 26/SE 11th Street intersection to the US 26/SE Palmquist Road intersection, and the US 26/SE Haley Road intersection to the US 26/OR 212 interchange. All other accesses to US 26 meet the applicable spacing standards.
Crash Data

Crash data for the segment of US 26 that extends from SE 11th Street to the OR 212 interchange were analyzed for potential safety issues. Exhibit 7 summarizes the severity and type of crashes over a five-year analysis period.

Exhibit 7.
US 26 Crash History by Type and Severity (2005–2009)a

<table>
<thead>
<tr>
<th>Segment</th>
<th>Number of Crashes</th>
<th>Collision Type</th>
<th>Severity</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 26 from SE 11th</td>
<td>116</td>
<td></td>
<td></td>
</tr>
<tr>
<td>St to OR 212</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>23</td>
<td>Turning</td>
<td></td>
</tr>
<tr>
<td></td>
<td>34</td>
<td>Rearend</td>
<td></td>
</tr>
<tr>
<td></td>
<td>14</td>
<td>Angle</td>
<td></td>
</tr>
<tr>
<td></td>
<td>45</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td></td>
<td>55</td>
<td>PDO</td>
<td></td>
</tr>
<tr>
<td></td>
<td>60</td>
<td>Injury</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Fatality</td>
<td></td>
</tr>
</tbody>
</table>

This information is from January 1, 2005 through December 31, 2009.
 PDO = Property Damage Only.

A more detailed investigation of the crash data from 2005 to 2009 showed the highest frequency of crashes occurred at the SE Palmquist Road/US 26 intersection (34 total crashes), the US 26 Eastbound Ramps/OR 212 intersection (13 crashes), and the US 26 Westbound Ramps/OR 212 intersection (12 crashes). All other study intersections had ten or fewer crashes over the five-year period. The one fatality occurred at the US 26/SE 26th Avenue intersection. There were 19 crashes with fixed objects between intersections along the study segment of US 26. Further review of the data found there were no predominant locations or causes of these crashes.

Exhibit 8 shows the crash rate for the same segment noted above and compares this crash rate to the statewide average.

Exhibit 8.
US 26 Crash Rate (2005–2009)

<table>
<thead>
<tr>
<th>Segment</th>
<th>Number of Crashes</th>
<th>Crashes Per Year</th>
<th>MVMa/Year</th>
<th>Crashes/MVM</th>
<th>Statewide Average Crashes/MVM</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 26 from SE 11th</td>
<td>116</td>
<td>23.8</td>
<td>50.99</td>
<td>0.47</td>
<td>0.61</td>
</tr>
<tr>
<td>St to OR 212</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

MVM = million vehicle miles.

For comparison purposes, the statewide average in year 2009 for expressways in urban areas and for Non-Interstate Freeways in rural areas was 0.61 crashes/MVM and 0.78 crashes/MVM, respectively. As shown in Exhibit 8, the crash rate for the US 26 segment within the management area is less than the statewide average for similar facilities.

2009 State Highway Crash Tables, Oregon Department of Transportation.
FUTURE (2030) NO-BUILD TRAFFIC PERFORMANCE

An analysis of future traffic volumes at the Springwater interchange and intersections within the management area was performed for projected 2030 conditions (Exhibit 9). One objective of this analysis was to determine how many lanes would be required at the interchange to meet future traffic demand levels. Additionally, the analysis would provide insight into local circulation improvements that are needed so that intersections in the management area provide adequate capacity for future demand.

Based on the future traffic analysis and the Springwater TSP, ODOT designed the arterial road, which crosses over US 26, as a five-lane facility. This configuration includes two eastbound lanes, two westbound lanes, and one turning lane.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Control</th>
<th>V/C Ratio</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 26 / SE 11th St</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>US 26 / SE Palmquist Rd</td>
<td>Signalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>US 26 / SE Hillyard Rd</td>
<td>Unsignalized</td>
<td>0.29</td>
<td>E</td>
</tr>
<tr>
<td>US 26 / SE 267th Ave</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>US 26 / SE Stone Rd</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>US 26 / SE Haley Rd</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>US 26 Westbound Ramps / OR 212</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>US 26 Eastbound Ramps / OR 212</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>SE 257th Dr / SE 11th St</td>
<td>Signalized</td>
<td>0.85</td>
<td>B</td>
</tr>
<tr>
<td>SE Orient Dr / SE Palmquist Rd</td>
<td>Signalized</td>
<td>&gt;1.0</td>
<td>D</td>
</tr>
<tr>
<td>SE Orient Dr / SE 267th Ave</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>SE Orient Dr / SE 282nd Ave</td>
<td>Signalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>SE Orient Dr / SE Haley Rd</td>
<td>Unsignalized</td>
<td>0.21</td>
<td>C</td>
</tr>
<tr>
<td>SE 267th / SE Hillyard Rd</td>
<td>Unsignalized</td>
<td>0.04</td>
<td>B</td>
</tr>
<tr>
<td>SE 252nd Ave / SE Hillyard Rd</td>
<td>Unsignalized</td>
<td>0.15</td>
<td>A</td>
</tr>
<tr>
<td>SE 267th / SE Stone Rd</td>
<td>Unsignalized</td>
<td>0.70</td>
<td>D</td>
</tr>
<tr>
<td>SE Telford Rd / SE Stone Rd</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
<tr>
<td>SE Hogan Rd / SE Rugg Rd</td>
<td>Unsignalized</td>
<td>0.18</td>
<td>D</td>
</tr>
<tr>
<td>SE 282nd Ave / SE Haley Rd</td>
<td>Unsignalized</td>
<td>&gt;1.0</td>
<td>F</td>
</tr>
</tbody>
</table>

a V/C = Volume-to-Capacity.
b LOS = Level of Service.

PLANNED TRANSPORTATION NETWORK

The future transportation network assumed in the regional model was based on the recommended network from the Springwater TSP. Key transportation improvements within the Springwater area are as follows:

- A new five-lane arterial would be constructed from the SE Hogan Road/SE Rugg Road intersection on the west to SE Orient Drive on the east.
- A new interchange on US 26 would be provided at the new arterial road.
A new three-lane collector road would extend from the SE Hogan Road/SE Butler Road intersection on the west to the new arterial on the east. The collector would cross US 26 via a new overpass structure.

- SE Hogan Road would be improved to a five-lane arterial.
- SE Orient Drive would be improved to a five-lane arterial from SE Palmquist Road to SE 282nd Avenue.
- Provisions for either on-street bicycle lane facilities or parallel off-street trails would be made for all community streets, collector streets, and arterials within the Springwater area.

ALTERNATIVE C-2 INTERCHANGE

Recommended Lane Configurations and Traffic Control for Alternative C-2

The project team conducted operational analyses under the projected 2035 traffic volumes to identify recommended lane configurations and traffic control measures at the study intersections for the preferred Alternative C-2 (Appendix F). Traffic signal warrant analyses were conducted at the key intersections to determine whether the intersections would meet signal warrants under the future traffic conditions.

Based on the analysis results, a number of additional capacity improvements are recommended at several study intersections. These network improvements, which would be beyond those included in the Springwater TSP, are as follows:

- On SE Orient Drive, the dominant travel pattern is for traffic to stay on SE Orient Drive, rather than turning onto the proposed arterial. Therefore, the existing alignment of SE Orient Drive should be preserved to maintain the continuity for through traffic. The proposed arterial street should connect to SE Orient Drive at a 90-degree “T” intersection. This intersection configuration would be a change from the adopted TSP.

- The projected travel demand volume on SE Hogan Road results in the need for three southbound through lanes within the management area. However, capacity constraints north of the management area along SE 242nd Avenue would likely limit these traffic flows and may prevent the projected demand from being fully realized. Further study of the SE Hogan Road (SE 242nd Avenue) corridor is needed and should be coordinated with the ongoing planning efforts for the City of Damascus.

- Significant capacity improvements (including a total of four southbound through lanes, three northbound through lanes, and multiple new turn lanes) will be needed at the US 26/SE Palmquist Road intersection to address the future traffic demand. Similar to SE Hogan Road, the actual traffic growth at this intersection will likely be limited by upstream capacity constraints. However, the City of Gresham and ODOT should anticipate the need for future improvements and consider further evaluation of this intersection area.

Analysis Results for Alternative C-2

The analysis of future traffic conditions under preferred Alternative C-2 is shown in Exhibit 10. The study intersections will all operate acceptably under the recommended lane configurations, with the exception of three unsignalized intersections. The US 26/SE 11th Street intersection, the US 26/SE

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4 At project initiation, traffic data for 2030 were available and were used to analyze future no-build traffic performance. During the course of project development, Metro updated the regional traffic model for a future year of 2035. Therefore, the traffic analysis for the alternatives evaluation was conducted using 2035 data. Based on a review of the 2030 and 2035 data, there is no significant difference between the 2030 and 2035 no-build analysis results.
Hillyard Road intersection, and the SE Orient Drive/SE 267th Avenue intersection are expected to operate at Level of Service (LOS) “F” by 2035. Additional turn restrictions may be appropriate at these intersections to address delays at the minor street approaches. These intersections will not influence the design or performance of the proposed interchange alternative.

The analysis shows the proposed arterial street (with a five-lane basic cross section) and the proposed collector (with a three-lane basic cross section) are expected to function acceptably through the 2035 design year, with additional capacity to last beyond 2035.

### Exhibit 10.
Intersection Analysis Results, Projected 2035 Design Hour Traffic Condition

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Intersection Control</th>
<th>V/C Ratio</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>US 26 / SE 11th St</td>
<td>Unsignalized</td>
<td>1.38</td>
<td>F</td>
</tr>
<tr>
<td>US 26 / SE Palmquist Rd</td>
<td>Signalized</td>
<td>0.88</td>
<td>D</td>
</tr>
<tr>
<td>US 26 / SE Hillyard Rd</td>
<td>Unsignalized</td>
<td>0.44</td>
<td>F</td>
</tr>
<tr>
<td>US 26 Westbound Ramps / Proposed Arterial</td>
<td>Signalized</td>
<td>0.76</td>
<td>D</td>
</tr>
<tr>
<td>US 26 Eastbound Ramps / Proposed Arterial</td>
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<td>0.79</td>
<td>D</td>
</tr>
<tr>
<td>SE 257th Dr / SE 11th St</td>
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<td>0.74</td>
<td>B</td>
</tr>
<tr>
<td>SE Orient Dr / SE Palmquist Rd</td>
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<td>0.85</td>
<td>C</td>
</tr>
<tr>
<td>SE Orient Dr / SE 267th Ave</td>
<td>Unsignalized</td>
<td>0.94</td>
<td>F</td>
</tr>
<tr>
<td>SE Orient Dr / Proposed Arterial</td>
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<td>0.74</td>
<td>B</td>
</tr>
<tr>
<td>SE Orient Dr / SE 282nd Ave</td>
<td>Signalized</td>
<td>0.82</td>
<td>C</td>
</tr>
<tr>
<td>SE 267th / SE Hillyard Rd</td>
<td>Unsignalized</td>
<td>0.04</td>
<td>A</td>
</tr>
<tr>
<td>SE 267th / Proposed Collector</td>
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<td>B</td>
</tr>
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<td>Proposed Collector / Proposed Arterial</td>
<td>Signalized</td>
<td>0.43</td>
<td>A</td>
</tr>
<tr>
<td>SE Telford Rd / Proposed Collector</td>
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<td>Signalized</td>
<td>0.79</td>
<td>C</td>
</tr>
<tr>
<td>SE 252nd Ave / SE Hillyard Rd</td>
<td>Unsignalized</td>
<td>0.13</td>
<td>C</td>
</tr>
<tr>
<td>SE 252nd Ave / Proposed Collector</td>
<td>Signalized</td>
<td>0.66</td>
<td>B</td>
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<td>SE 252nd Ave / Proposed Arterial</td>
<td>Signalized</td>
<td>0.58</td>
<td>A</td>
</tr>
<tr>
<td>SE Hogan Rd / SE Butler Rd</td>
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</tr>
<tr>
<td>SE Hogan Rd / SE Rugg Rd</td>
<td>Signalized</td>
<td>0.81</td>
<td>B</td>
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</tbody>
</table>

### Alternative C-2 Interim Improvement Findings

The project team conducted a traffic analysis of the interim improvements for Alternative C-2. Comparing the existing traffic volumes and the 2035 build-out projections, the team developed estimates of interim year traffic conditions to evaluate the expected performance of the interim improvements. The analysis resulted in the following findings:

- The interim improvements for Alternative C-2 could operate acceptably through the year 2020, assuming approximately a 50 percent build-out of the Springwater area.
- By 2025, the right-in/right-out access points on US 26 at SE 267th Avenue would be over capacity. Constructing right-turn acceleration lanes on US 26 could potentially extend the intersection capacity beyond 2025.
- By 2025, the intersection of the new arterial and SE Telford Road would be over its capacity.
The interim arterial bridge over US 26 for the interim improvements should be constructed with a three-lane cross section (with the capacity to add two lanes in the future).

Closing the existing SE Stone Road/US 26 intersection would likely result in increased traffic on SE Hillyard Road. To avoid negative impacts to SE Hillyard Road and other residential streets, the new arterial should be connected to SE Orient Drive, or other alternative connections to SE 282nd Avenue prior to closing the SE Stone Road/US 26 intersection.

LOCAL STREET NETWORK
Based on the Springwater Community Plan, ODOT developed local street network recommendations or options that would enable the local system within the management area to meet project demand in 2035. Those options include the following:

- The existing alignment of SE Orient Drive should be preserved to maintain the continuity for through traffic.
- The arterial should connect to SE Orient Drive at a 90-degree "T" intersection.
- The intersection at SE Orient Drive should be designed to discourage eastbound traffic from Springwater to reduce impacts to rural areas to the east.
- SE Hogan Road should have three southbound through lanes and two northbound lanes within the management area, although capacity constraints north of the management area along SE 242nd Avenue would likely limit these traffic flows and may prevent the projected demand from being fully realized.

LOCAL ACCESS AND CIRCULATION PLAN
To prepare the Local Access and Circulation Plan, the PMT evaluated future access locations and public street connections for properties and streets within the management area. The intent of the Local Access and Circulation Plan is to identify goals that will guide the design of site-access driveways and internal circulation routes for properties located within the management area that are likely to be developed at some point in the future. For those properties that may not be redeveloped by the time the new interchange is constructed, the plan will also be useful for evaluating how access to those sites should continue to be served. Given that construction of the interchange is not likely to occur for at least several years and the layout of future development is unknown, this AMP focuses on general access spacing guidelines for each of the project area roads.

Access Management Plan
Access locations will be guided by ODOT's Division 51 Access Management standards, the guidelines set forth in Policies 2(c) and 3C of the 1999 OHP, and the City of Gresham’s access spacing standards. Spacing standards associated with a Fully Developed Urban Interchange Management Area are shown in Exhibit 11 with a graphic of spacing standards in Exhibit 12.

Exhibit 11. Minimum Spacing Standards Applicable to Freeway Interchanges with Multi-Lane Crossroads (OHP Table 19)

<table>
<thead>
<tr>
<th>Type of Area</th>
<th>Spacing Dimension</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban</td>
<td>A = Distance between the start and end of tapers of adjacent interchanges</td>
</tr>
<tr>
<td></td>
<td>Y = Distance to first intersections where left turns are allowed</td>
</tr>
<tr>
<td></td>
<td>1 mile</td>
</tr>
</tbody>
</table>

*An Urban Interchange Management Area is within a UGB and is not a Fully Developed Urban Interchange Management Area (1999 Oregon Highway Plan).*
The spacing standards outlined in Exhibit 13 represent minimum distances between driveways and/or adjacent intersections within the City of Gresham. In addition, the access management principles outlined in Gresham’s Development Code (Section A5.503) and ODOT’s Access Management Manual should be applied when considering and reviewing the site access and development plans of individual properties as they are developed.

### Exhibit 13. City of Gresham Minimum Access Spacing Standard

<table>
<thead>
<tr>
<th>Roadway/Access Type</th>
<th>Commercial/Industrial</th>
<th>Residential</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arterial</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minimum distance from ramp terminal to first access point</td>
<td>1,320 ft</td>
<td>1,320 ft</td>
</tr>
<tr>
<td>Minimum distance between subsequent access points</td>
<td>100 ft</td>
<td>100 ft</td>
</tr>
<tr>
<td>Collector</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SE Telford Rd</td>
<td>100 ft</td>
<td>45 ft</td>
</tr>
<tr>
<td>SE 242nd Avenue</td>
<td>100 ft</td>
<td>45 ft</td>
</tr>
<tr>
<td>SE 252nd Avenue</td>
<td>100 ft</td>
<td>45 ft</td>
</tr>
<tr>
<td>SE 267th Avenue</td>
<td>100 ft</td>
<td>45 ft</td>
</tr>
<tr>
<td>SE Orient Drive</td>
<td>100 ft</td>
<td>100 ft</td>
</tr>
<tr>
<td>SE Stone Road</td>
<td>100 ft</td>
<td>45 ft</td>
</tr>
<tr>
<td></td>
<td>45 ft</td>
<td>45 ft</td>
</tr>
</tbody>
</table>

**Deviations to ODOT Access Management Standards**

For preferred Alternative C-2, two intersections on the proposed arterial do not meet the 1,320-foot access spacing requirement from the ramp terminals, as identified in ODOT’s Division 51 standard. In addition, the spacing from the SE Hillyard Road/US 26 intersection to the proposed on/off ramps does not meet the ODOT minimum standard of 1 mile. Therefore, deviations are required under the provisions of OAR 734-51-0135 as described below, and have been reviewed by the ODOT Region 1 Access Management Engineer.
Amendment to GCDP Volume 4 - Transportation System Plan: Springwater Transportation System Plan

US 26: Access to Springwater-Interchange Area Management Plan (ODOT)

Under the provisions of OAR 734-51-0135(3), the ODOT Region Access Management Engineer may approve a deviation if:

(a) Adherence to spacing standards creates safety or traffic operation problems;
(b) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway;
(c) The applicant demonstrates that existing development patterns or land holdings make joint use approaches impossible;
(d) Adherence to spacing standards will cause the approach to conflict with a significant natural or historic feature including trees and unique vegetation, a bridge, waterway, park, archaeological area, or cemetery;
(e) The highway segment functions as a service road;
(f) On a couplet with directional traffic separated by a city block or more, the request is for an approach at mid-block with no other existing approaches in the block or the proposal consolidates existing approaches at mid-block; or
(g) Based on the Region Access Management Engineer’s determination that:
   (A) Safety factors and spacing significantly improve as a result of the approach; and
   (B) Approval does not compromise the intent of these rules as set forth in OAR 734-051-0020.

Further, under the provisions of OAR 734-51-0135(5), the Region 1 Access Management Engineer may approve a deviation for an approach located in an interchange access management area if:

(a) A condition of approval, included in the Permit to Operate, is removal of the approach when reasonable alternate access becomes available;
(b) The approach is consistent with an AMP for an interchange that includes plans to combine or remove approaches resulting in a net reduction of approaches to the highway;
(c) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway; or
(d) The applicant demonstrates that existing development patterns or land holdings make utilization of a joint approach impracticable.

These provisions are addressed below for each of the three intersections.

**SE Telford Road at the Proposed Arterial**

A deviation to the 1,320-foot access spacing requirement identified in OAR 734-051-0125 is required at the proposed arterial/SE Telford Road intersection, located approximately 1,100 feet southwest of the proposed US 26 eastbound ramp terminal intersection. Under the provisions of OAR 734-51-0135(3), the ODOT Region Access Management Engineer may approve a deviation for a public approach that is identified in a local comprehensive plan and provides access to a public roadway if:

The provisions of OAR 734-51-0135(3) and OAR 734-51-0135(5) are addressed as follows:

(3)(a) Adherence to spacing standards creates safety or traffic operation problems.

Response: Not applicable (NA)

(3)(b) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway.

Response: SE Telford Road is a public collector road providing access to numerous neighborhoods, developments, and local streets. The proposed AMP would reduce the need for future access points
on the proposed arterial between the interchange and SE Telford Road. Furthermore, the proposed Local Circulation Plan would realign SE 262nd Avenue to intersect SE Telford Road approximately 500 feet north of the proposed arterial. In this way, the plan removes existing approaches and reduces the need for potential future approaches within the interchange area.

(3)(c) The applicant demonstrates that existing development patterns or land holdings make joint use approaches impossible.

Response: NA

(3)(d) Adherence to spacing standards will cause the approach to conflict with a significant natural or historic feature including trees and unique vegetation, a bridge, waterway, park, archaeological area, or cemetery.

Response: SE Telford Road is located immediately east and adjacent to the Springwater Corridor Trail, which is immediately east and adjacent to Johnson Creek. Shifting the alignment of SE Telford Road to the west to meet the access spacing standard would have significant impacts to the trail and Johnson Creek as well as the wetland and riparian areas surrounding them. The alternatives evaluation process considered a design alternative in which the proposed arterial crossed over SE Telford Road on a new overpass structure with a jughandle connection to the west that would meet the access spacing standard. However, this alternative was ultimately dismissed by the PMT because it provided lower overall value with respect to the project's goals, criteria, and measures.

(3)(e) The highway segment functions as a service road.

Response: NA

(3)(f) On a couplet with directional traffic separated by a city block or more, the request is for an approach at mid-block with no other existing approaches in the block or the proposal consolidates existing approaches at mid-block.

Response: NA

(3)(g) Based on the Region Access Management Engineer's determination that: (A) Safety factors and spacing significantly improve as a result of the approach; and (B) Approval does not compromise the intent of these rules as set forth in OAR 734-051-0020.

Response: The proposed design, which provides a spacing of approximately 1,100 feet from the ramp terminal intersection, is not expected to compromise the safety of the transportation system.

(5)(a) A condition of approval, included in the Permit to Operate, is removal of the approach when reasonable alternate access becomes available.

Response: NA

(5)(b) The approach is consistent with an AMP for an interchange that includes plans to combine or remove approaches resulting in a net reduction of approaches to the highway.

Response: The proposed AMP would reduce the need for future access points on the proposed arterial between the interchange and SE Telford Road. Furthermore, the proposed Local Circulation Plan would realign SE 262nd Avenue to intersect SE Telford Road approximately 500 feet north of the proposed arterial. In this way, the plan reduces approaches from the interchange management area.

(5)(c) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway.

Response: See response to (3)(b) above.

(5)(d) The applicant demonstrates that existing development patterns or land holdings make utilization of a joint approach impracticable.

Response: NA
Realigned SE Jeanette Street at Proposed Arterial

A deviation to the 1,320-foot access spacing requirement identified in OAR 734-051-0125 is required at the proposed arterial/realigned SE Jeanette Street intersection, located approximately 1,200 feet northeast of the proposed US 26 eastbound ramp terminal intersection. The provisions of OAR 734-51-0135(3) and OAR 734-51-0135(5) are addressed as follows:

(3)(a) Adherence to spacing standards creates safety or traffic operation problems.

Response: NA

(3)(b) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway.

Response: The proposed Local Circulation Plan would realign SE Jeanette Street on the southeast side of the proposed arterial, and it would extend and realign SE Anderson Road on the northwest side to form a single intersection with the proposed arterial. SE Jeanette Street and SE Anderson Road would have full access to the arterial. As such, the planned network combines local street approaches and will provide access to multiple properties on both sides of the proposed arterial.

(3)(c) The applicant demonstrates that existing development patterns or land holdings make joint use approaches impossible.

Response: NA

(3)(d) Adherence to spacing standards will cause the approach to conflict with a significant natural or historic feature including trees and unique vegetation, a bridge, waterway, park, archaeological area, or cemetery.

Response: The proposed intersection has been located as far as possible from the ramp terminal intersection without creating conflicts to the North Fork of Johnson Creek. Shifting the intersection further northeast to meet the spacing standard would result in impacts to the North Fork of Johnson Creek and surrounding riparian area.

(3)(e) The highway segment functions as a service road.

Response: NA

(3)(f) On a couplet with directional traffic separated by a city block or more, the request is for an approach at mid-block with no other existing approaches in the block or the proposal consolidates existing approaches at mid-block.

Response: NA

(3)(g) Based on the Region Access Management Engineer’s determination that: (A) Safety factors and spacing significantly improve as a result of the approach; and (B) Approval does not compromise the intent of these rules as set forth in OAR 734-051-0020.

Response: The proposed design, which provides a spacing of approximately 1,200 feet from the ramp terminal intersection, is not expected to compromise the safety of the transportation system.

(5)(a) A condition of approval, included in the Permit to Operate, is removal of the approach when reasonable alternate access becomes available.

Response: NA

(5)(b) The approach is consistent with an AMP for an interchange that includes plans to combine or remove approaches resulting in a net reduction of approaches to the highway.

Response: SE Jeanette Street and the proposed local street connection (directly opposite SE Jeanette Street) on the northwest side of the proposed arterial will provide access to the parcels along the...
arterial. As such, the subject intersection will reduce the need for future access points on the arterial within the interchange management area.

(5)(c) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway.

Response: See response to (3)(b) above.

(5)(d) The applicant demonstrates that existing development patterns or land holdings make utilization of a joint approach impracticable.

Response: NA

**SE Hillyard Road at US 26**

The following deviation to the 1-mile access spacing requirement identified in OAR 734-051-0125 is required at the Hillyard Road/US 26 intersection, located approximately 3,200 feet north of the end of the ramp tapers for the proposed new interchange. The provisions of OAR 734-51-0135(3) and OAR 734-51-0135(5) are addressed as follows:

(3)(a) Adherence to spacing standards creates safety or traffic operation problems.

Response: NA

(3)(b) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway.

Response: SE Hillyard Road is a city street providing access to many properties, including neighborhoods on both the east and west sides of US 26.

(3)(c) The applicant demonstrates that existing development patterns or land holdings make joint use approaches impossible.

Response: NA

(3)(d) Adherence to spacing standards will cause the approach to conflict with a significant natural or historic feature including trees and unique vegetation, a bridge, waterway, park, archaeological area, or cemetery.

Response: NA

(3)(e) The highway segment functions as a service road.

Response: NA

(3)(f) On a couplet with directional traffic separated by a city block or more, the request is for an approach at mid-block with no other existing approaches in the block or the proposal consolidates existing approaches at mid-block.

Response: NA

(3)(g) Based on the Region Access Management Engineer’s determination that: (A) Safety factors and spacing significantly improve as a result of the approach; and (B) Approval does not compromise the intent of these rules as set forth in OAR 734-051-0020.

Response: The intersection at SE Hillyard Road and US 26 is an existing at-grade intersection with turning movements currently restricted to right-in, right-out, and left-in movements. Disconnecting Hillyard Road from US 26 would cause significant added travel distance for drivers accessing this neighborhood. It would also result in 50–100 additional turn movements at the Palmquist/US 26 intersection, which is projected to operate well over capacity in the future. The previous safety analysis found there have been only two crashes at the Hillyard/US 26 intersection over the five-year period between 2002 and 2006. With the construction of the new interchange, the safety at the
Hillyard intersection is not expected to be compromised. Therefore, preserving the existing Hillyard/US 26 intersection is expected to provide a higher level of safety and efficiency for the overall transportation system.

(5)(a) A condition of approval, included in the Permit to Operate, is removal of the approach when reasonable alternate access becomes available.

Response: NA

(5)(b) The approach is consistent with an AMP for an interchange that includes plans to combine or remove approaches resulting in a net reduction of approaches to the highway.

Response: The IAMP includes removing the existing at-grade intersection at SE Stone Road and US 26 while replacing the existing at-grade intersection at SE 26th Avenue and US 26 with an interchange. As such, the overall number of access points on US 26 will be reduced.

(5)(c) The applicant provides a joint approach that serves two or more properties and results in a net reduction of approaches to the highway.

Response: See response to (3)(b) above.

(5)(d) The applicant demonstrates that existing development patterns or land holdings make utilization of a joint approach impracticable.

Response: NA

Local Circulation Plan

Exhibit 14 illustrates the proposed Local Circulation Plan for the management area. As shown in Exhibit 14, the plan maintains the existing local street network where possible, and creates a number of new local street connections to the new and existing arterial and collector facilities. To achieve ODOT’s access management standards, all local streets within the immediate vicinity of the ramp terminal intersections would be realigned to intersect with SE Telford Road or the collector road. Additional realignments and modifications to existing local streets are needed to provide appropriate spacing of intersections, allow for proper intersection geometry, and maintain access to existing parcels. In particular, SE Stone Road and SE Haley Road will be closed at their intersections with US 26 upon construction of the interchange.

5 SE Haley Road is outside of the management area, but within the minimum spacing standards applicable to non-freeway interchanges with multi-lane crossroads.
SECTION 3. IMPLEMENTATION AND ADOPTION

ODOT and the City of Gresham will be jointly responsible for adopting and implementing the Springwater IAMP. A set of implementing policies adopted as part of the Springwater Community Plan guide how ODOT and the City work together to implement the Springwater IAMP. The City of Damascus will not be impacted by interchange improvements within its jurisdiction, and therefore no adoption or implementation policies will be required from that City. Although the SE Haley Road intersection will be closed within Clackamas County’s jurisdiction, no adoption or implementation policies will be required.

The sections below describe the implementing actions for which each jurisdiction is responsible. ODOT and the City of Gresham will implement the AMP element of this document through the access control measures listed below.

IAMP ADOPTION

Just as ODOT and the City of Gresham jointly prepared the Springwater IAMP, both will be responsible for adopting the IAMP. The City of Gresham will be the first to adopt the Springwater IAMP by amending the Springwater TSP to reflect the IAMP. Following the City’s adoption of the Springwater IAMP, the OTC will adopt the IAMP as a facility plan. The ODOT Region Planner will be responsible for preparing findings for the OTC to adopt the IAMP as a facility plan that specifies ODOT and the City of Gresham’s responsibilities.

ODOT/State of Oregon Implementing Actions

ODOT’s responsibilities for implementing the Springwater IAMP include:

- Adopting the Springwater IAMP as a facility plan and amending the OHP.
- Design and construction of the Springwater interchange. This includes the portion of the proposed arterial (including the overcrossing) within 1,320 feet east and west of US 26 and the interchange ramps.
- Seeking and providing funding for the interchange.
- Purchasing access control from private properties.
- Relocating or closing access points.
- Regulating the use of access points through establishment of deed restrictions.
- Developing traffic control devices.

City Implementing Actions

The City of Gresham will be responsible for the following implementing actions:

- Amending the Springwater TSP to include identified local street improvements and the location and design of the recommended alternative.
- Amending the Springwater TSP to include identified access management policies.
- Annexing the Springwater area in the vicinity of the interchange, prior to development of the interchange and its related transportation elements. All parcels affected by the interchange and interim transportation elements will be annexed into the City prior to construction.
- Seeking and providing funding for the interchange and identified local street improvements.

Should funding only allow for the construction of the interim C-2 alignment, the City shall develop an ordinance to restrict development once the interim C-2 alignment reaches capacity (Concurrency Ordinance), until such a time as funding is provided to implement the full C-2 interchange design.
Developing supporting local roadway connections.

**Multnomah County Implementing Actions**

Multnomah County Board of Commissioners accepted, by resolution, the *Springwater Community Plan* as the concept plan for urbanizing the Springwater area, required by Metro. Urbanization, including the transportation facilities identified in the *Springwater TSP*, will only occur in areas that are incorporated into the City of Gresham. Multnomah County does not have land use or transportation jurisdiction within the City of Gresham; therefore, no County implementing actions are required for the IAMP. Multnomah County continues to support Gresham’s implementation of the *Springwater Community Plan*. The Multnomah County Board of Commissioners can act on a resolution to accept the City of Gresham’s amendments to the *Springwater Community Plan* that incorporates the IAMP.

**ODOT and City Implementing Policies**

The following policies guide how ODOT and the City of Gresham will continue to coordinate on future issues affecting the investment in the Springwater interchange. Examples of possible future issues include zoning changes in the Springwater area, changes to the local circulation network, or amendments to adopted plans.

- ODOT will continue to coordinate with local governments and state agencies, through the plan amendment and development review process, to keep land use protections in place. ODOT will also monitor and comment on any future actions that would amend the UGB.

- If future circumstances in the IAMP management area result in the need for changes to the IAMP, the local government and ODOT shall jointly prepare amendments to the IAMP management actions and an accompanying funding plan to implement those actions.

- The City of Gresham recognizes the importance of US 26 in the movement of people and goods to and from the region and is committed to protecting the function of the highway and the interchange as defined in the IAMP.

- The City of Gresham will coordinate with ODOT in evaluating land use actions that could affect the function of the interchange.

- The City of Gresham will coordinate with ODOT prior to amending its comprehensive plan (including the TSP), land development ordinances or UGB, or proposing transportation improvements that could affect the function of the interchange. The City of Gresham will ensure that any such amendments are consistent with the function of the interchange as defined in the IAMP.
SECTION 4. CONSISTENCY WITH GOALS AND CRITERIA

Based on the screening and evaluation processes, the recommended alternative, C-2, meets the intent of the project purpose and intent and is also consistent with the project goals and criteria. Unlike other alternatives screened, the recommended alternative is consistent with the Springwater TSP because the interchange is in the same general location as the interchange area shown in adopted plans. Additionally, Alternative C-2 includes a collector road connecting SE Orient Drive to SE Hogan Road over US 26 just north of the interchange.

Following the screening process, the alternatives that successfully passed through the screening process went through an evaluation process. The purpose of the evaluation process was to ensure that the alternatives met the intent of the project goals and criteria. Additionally, the evaluation process determined if the alternatives were financially feasible in comparison to other alternatives. As stated above, Alternative C-2 is the recommended alternative due to its comparatively low impact on the natural environment, low cost, and moderate residential displacements.
SECTION 5. COMPATIBILITY AND COMPLIANCE

CITY OF GRESHAM

The project is compatible with the City of Gresham's land use planning regulations. As described, the Springwater Community Plan specifically identifies an interchange near the intersection of US 26 and SE 267th Avenue as a future transportation project.

MULTNOMAH COUNTY

Currently, unincorporated areas within the Springwater management area are subject to land use and transportation policies in Multnomah County's West of Sandy River Transportation and Land Use Plan. Land use and development in the unincorporated area is regulated by the Multnomah County Zoning Code. Multnomah County has accepted the Springwater Community Plan as consistent with the Intergovernmental Agreement between the County and City of Gresham for the urbanization of the Springwater area. Urbanization, including the construction of the interchange and interim transportation facilities, will occur within and under the jurisdiction of the City of Gresham. Therefore, Multnomah County policies do not apply to the implementation of the Springwater IAMP.

TRANSPORTATION PLANNING RULE

The Transportation Planning Rule (OAR 660, Division 12) contains several requirements governing transportation planning in Oregon. With regards to the Springwater IAMP, the Transportation Planning Rule specifically authorizes the replacement of an intersection with an interchange (OAR 660-012-0065 (3)(e)).
SECTION 6. MONITORING AND UPDATES

This section discusses the need to update the IAMP, and identifies those changes that may trigger an update over time. There are four such instances:

If an adjacent interchange is added or significantly modified, an update to this IAMP may be required.

When the City of Gresham’s TSP is updated, the IAMP should be reviewed and updated if necessary.

If a change to the current City of Gresham Comprehensive Plan Map or Zoning Map land use designation is initiated, the applicant will be required to undertake a legislative process to amend and update the Springwater IAMP in order to demonstrate that the proposed amendment is consistent with the planned improvements in the Springwater IAMP. Proposed Comprehensive Plan and Zoning Map land use designation changes can be initiated by any party with jurisdiction in the area, such as Multnomah County, City of Gresham, Clackamas County, or City of Damascus. A property owner or developer could also initiate a land use change. If the proposed change would result in the need for additional capacity at the interchange, the initiating party shall propose amendments to the IAMP and shall prepare a funding plan for ODOT and local jurisdiction review. Proposed IAMP amendments shall be coordinated with ODOT and local jurisdiction staff, and the revised IAMP and funding plan shall be submitted to the local jurisdiction and the OTC for approval and adoption.

AMP Modifications. Recommended actions in the AMP are based on property configurations, development application approvals, and ownership existing at the time of the Springwater IAMP’s adoption. Lot consolidation and other land use actions may necessitate an amendment to the AMP. Modifications to the AMP may occur through agreement by the City of Gresham and ODOT and require an amendment to the Springwater IAMP. Such modifications will be allowed only if the proposed modifications meet, or move in the direction of meeting, the adopted access management spacing requirements in the Springwater IAMP.

ODOT will monitor and comment on any future amendments to the jurisdictional boundaries if those amendments could result in levels of travel that would exceed mobility standards adopted for the Springwater interchange.
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BEFORE THE CITY COUNCIL OF THE
CITY OF GRESHAM

IN THE MATTER OF AMENDMENTS TO CHAPTER 9 OF VOLUME 4 OF THE GRESHAM COMMUNITY DEVELOPMENT PLAN AS IT RELATES TO THE TRANSPORTATION SYSTEM PLAN FOR THE SPRINGWATER COMMUNITY PLAN ) Order No. 629 CPA 10-267

On January 18, 2011, the City Council held a public hearing to take testimony on amendments to Volume 4 of the Gresham Community Development Plan to as it relates to the transportation system plan for the Springwater Community Plan.

The hearing was conducted under Type IV procedures. Council President David Widmark presided at the hearing.

The Council closed the public hearing at the January 18, 2011 meeting, and a final decision was made at the February 15, 2011 meeting.

A permanent record of this proceeding is to be kept on file in the Gresham City Hall, along with the original of the Order.

The Council orders that these amendments are approved, adopts the standards, findings and conclusions as stated in the attached Planning Commission Recommendation Order and staff reports.

Dated: February 15, 2011

City Manager

Mayor
A public hearing was held on December 13, 2010, upon an application to consider proposed amendments to Volume 4, Transportation System Plan, of the Gresham Community Development Plan related to the Springwater Interchange Area Management Plan.

The Commission closed the public hearing at the December 13, 2010 meeting, and a final recommendation to Council was made at the December 13, 2010 meeting.

William Bailey, Chairperson, presided at the hearing.

A permanent record of this proceeding is to be kept on file in the Gresham City Hall, along with the original of this Type IV Recommendation Order.

The Planning Commission recommends APPROVAL of the proposed Community Development Plan amendments to the City Council, and adopts the findings, conclusions and recommendations contained in the attached staff report with the following exceptions, additions and/or changes:

No Changes
MEMORANDUM
URBAN DESIGN & PLANNING

STAFF REPORT

TYPE IV HEARING—COMPREHENSIVE PLAN AMENDMENT

SPRINGWATER TRANSPORTATION SYSTEM PLAN AMENDMENTS

To: Gresham Planning Commission
From: John Dorst, Deputy Director, Environmental Services
        Katherine Kelly, Transportation Planning Manager

Hearing Date: December 13, 2010
Report Date: December 3, 2010
File: CPA 10-267

Proposal: To adopt comprehensive plan amendments to Volume 4 (Springwater Transportation System Plan or “TSP”) of the Gresham Community Development Plan. The purpose of these amendments to adopt refinements to the TSP that incorporate a Springwater Interchange Area Management Plan (IAMP).

Exhibits: ‘A’ – Draft amendments to Volume 4 of the Community Development Plan, the Springwater Transportation System Plan.

Recommendation: Staff recommends adoption of the proposed Comprehensive Plan amendments to the City Council.
Staff Report Organization and Contents
• Section I is an Executive Summary of the project that provides an overview of proposed amendments to Volume 4 of the Community Development Plan.
• Section II identifies the current Goals and Policies identified in Volume 2 of Community Development Plan Goals and Policies that apply to the proposal.
• Section III identifies applicable Development Code procedures that apply to the proposal.
• Section IV identifies the applicable Statewide Planning Goals that apply to the proposal.
• Section V contains findings of fact that indicate how the proposal is consistent with Sections II, III, and IV:
  o Subsection A is findings of fact for the Community Development Plan Goals and Policies.
  o Subsection B identifies applicable Development Code procedures that apply to the proposal.
  o Subsection C is findings of fact for the Statewide Planning goals.
• Sections VI and VII summarize staff conclusions and recommendations.
• Exhibit ‘A’ includes proposed amendments to Volume 4 of the Community Development Plan.

SECTION I
EXECUTIVE SUMMARY

Background
The project is part of the 2010 Council Work Plan and supports an update to the City of Gresham Transportation System Plan (TSP). In 2005 an amendment to the City of Gresham TSP was adopted and consisted of an addendum titled “Springwater Transportation System Plan”. This project proposes amendments to the Springwater TSP.

The proposed amendments to the Springwater TSP consist of refinements in the transportation network that will enhance safety and access to the Springwater Plan Area, and which will support the Springwater Comprehensive Plan’s development of industrial land uses. More specifically, the amendments: 1) define a preferred alternative for a new interchange on US 26 near 267th Avenue, 2) reconfirm the Springwater Comprehensive Plan’s location for a collector road to connect SE 252nd Avenue and Orient Drive and a new arterial road to connect SE Rugg Road in the vicinity of SE 252nd Avenue and over US 26 via an interchange to SE Orient Drive.

The amendments consist of proposed text changes in the TSP and the addition of a new attachment to the TSP, titled the Springwater Interchange Area Management Plan (hereafter referred to as the “IAMP”). Oregon Administrative Rule (OAR) 734-051-0155 requires that an IAMP be prepared for any new interchange and recommends an IAMP for significant modifications to existing interchanges.

A benefit to adopting the IAMP, which includes the preferred alternative for a new interchange at US 26 and 267th (hereafter referred to as the “Springwater interchange”), is that it allows the City of Gresham and the Oregon Department of Transportation to collectively begin the process to apply for federal funds to design and construct the interchange when they are available. At this time there are no federal funds allocated for this project. Cost estimates to acquire rights-of-way, design, engineer, and construct the interchange are estimated at $24.5 million.

Proposed Comprehensive Plan Amendments Overview
Text changes to Community Development Plan, Volume 4 are proposed. The format of the attached Exhibit ‘A’ is a strikethrough/underline version with those revisions shown in red font. The overview provided below summarizes the changes:

The following amendments are proposed to support adoption of the IAMP and to comply with applicable State of Oregon Administrative Rules for Transportation (OAR 660-012-0500):
• Adding language in the “US26 Improvements” section to an update on the process identify a preferred alternative for access from US 26 to Springwater.
• Deleting text in the "Potential US 26 Corridor Construction Phasing" section to eliminate previously identified alternatives to review as part of an IAMP. This text is deleted because the IAMP process has been completed.

• Revising text in the "Outstanding Issues" section to reflect a new study that is currently underway, the Metro-led corridor refinement plan, the East Metro Connections Plan. That Plan will review and identify north-south connections between I-84 and US 26. These changes are included in this update of the Springwater TSP because improvements to access Springwater from US 26, as identified in the IAMP, will inform this new study.

• Incorporating the IAMP report, prepared by the Oregon Department of Transportation and Parametrix, as Attachment A to the Springwater TSP.

• Additional minor formatting changes are proposed throughout the TSP.

SECTION II
APPLICABLE COMMUNITY DEVELOPMENT PLAN GOALS & POLICIES

Section 10.014: Land Use Planning, Land Use Policies and Regulations and Community Design
Section 10.100: Citizen Involvement
Section 10.320: Transportation System
Section 10.800: Springwater Plan District

SECTION III
APPLICABLE COMMUNITY DEVELOPMENT CODE PROCEDURES

Section 11.0200: Classification of Applications
Section 11.0600: Type IV Procedure – Legislative
Section 11.1100: Public Hearings

SECTION IV
STATEWIDE PLANNING GOALS

Goal 12: Transportation

SECTION V
FINDINGS OF FACT

The proposed Community Development Plan amendments attached as Exhibit “A” (Springwater TSP and Attachment A to that document, US 26: Access to the Springwater Community Interchange Area Management Plan) are consistent with all applicable Procedures, Goals and Policies of the Community Development Plan, Community Development Code Procedures, and Statewide Planning Goals as indicated in the following findings.
A. COMMUNITY DEVELOPMENT PLAN GOALS AND POLICIES (VOLUME II)

This section identifies the applicable Community Development Plan Goals and Policies. The text (italicized) of the Policy is followed by corresponding findings and conclusions. The applicable Policies are grouped by general categories.

1. General Goals & Policies

Section 10.014 Land Use Policies and Regulations
Goal: Maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham's land use program.

Policy 6: The City shall, consistent with applicable laws, ensure that all required public facilities and services are available or committed prior to development approval and are constructed or provided concurrently with development or prior to development occupancy.

Policy 14: The City’s public facility plan and its other facility master plans shall be coordinated with the requirements of projected growth within its urban services boundary and those Urban Growth Boundary Areas that may be added to the City at a future date.

Policy 21: Council may, upon finding it is in the overall public interest, initiate legislative processes to change the Comprehensive Plan text and Community Development Plan Map(s) and Development Code.

Policy 23: Gresham shall coordinate the development, adoption and amendment of its land use related goals, policies and implementing measures with other affected jurisdictions, agencies and special districts.

Findings
These general Goal and Policies establish the City's intent to use its Comprehensive Plan (Gresham Community Development Plan [GCDP]) as the basis for appropriate planning processes and resulting land use plans. The above goal and applicable policies are met as follows:

Policy 6: The proposed amendments provide a preferred alternative for public facilities that will allow adequate transportation capacity and safety concurrent or prior to development in Springwater.

Policy 14: The proposed amendments for new public facilities were developed using regionally forecasted travel demand volumes. The new facilities are within the Urban Growth Boundary in an area proposed for annexation into the City of Gresham.

Policy 21: The proposed amendments were requested by the Gresham City Council to help determine the location of new transportation facilities as adopted in the Springwater Transportation System Plan. The City Council initiated the project on Dec. 15, 2009, by adopting it in its 2010 Work Plan.

Policy 23: These proposed amendments were developed in coordination with the State of Oregon Department of Transportation, Multnomah County, City of Damascus, and the residents of the Springwater Plan Area. Their recommendations have been incorporated as noted in the Springwater Interchange Area Management Plan, which is an attachment to the Springwater TSP.

Conclusion
The proposed amendments are part of the Transportation System Plan project, which was initiated by Council as part of its 2010 Work Plan. They conform to State and regional law and Gresham's Community Development Plan, as described in Sections II, III, IV and V of this staff report.

The proposal is consistent with the applicable general goals and policies listed in this section.
2. Citizen Involvement Goals & Policies

Section 10.100 Citizen Involvement

Goal: The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.

Goal: The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.

Policy 1: The City shall ensure the opportunity for citizen participation and input when preparing and revising policies, plans and implementing regulations.

Policy 2: The City shall consider the interests of the entire community and the goals and policies of the Comprehensive Plan when making decisions.

Policy 10: The City shall ensure the opportunity for the public to be involved in all phases of planning projects and issues.

Policy 11: The City shall ensure that the public has complete and timely access to all public information concerning land use projects and issues. This includes private development proposals once they are in the formal application process.

Findings

The public involvement goals and policies establish the City's intent that its citizens have opportunities throughout a planning project to be informed and to affect proposals.

The key stakeholders who have been involved in the development of a preferred alternative for the IAMP include the Springwater community, the Transportation Subcommittee, and the Johnson Creek Watershed Council. All three primary groups in addition to a Project Management Team consisting of staff from the Oregon Department of Transportation, Multnomah County, and the City of Damascus have been involved in the project. Their involvement has included development of criteria to select a preferred alternative as well as final selection of a preferred alternative. Their suggestions have been incorporated as described in the Attachment A of the Springwater TSP, the US 26: Access to the Springwater Community Interchange Area Management Plan, or IAMP.

The following measures were taken to inform citizens and involve them in this project:

- 2/12/2009: Interested Parties Meeting to receive input on initial concept alternatives for the IAMP.
- 3/25, 5/5, and 7/20/2010: Three Stakeholder Focus Group Meetings (Attendees included Springwater residents, development groups, Mt. Hood Neighborhood Association, East Metro Economic Alliance, and Johnson Creek Watershed Council members, among others).
- 6/8/2010: City Council Work Session to discuss three final alternatives plus draft evaluation criteria to select a preferred alternative.
- 7/27/2010: Public Open House to receive input on three final alternatives plus draft evaluation criteria to select a preferred alternative.
- 10/25/2010: Planning Commission Work Session to review preferred alternative.
- 11/2/2010 and 11/9/2010: Focus Group meetings with property owners who may be directly impacted by preferred alternative.
- 2009-2010: Project updates provided at the regularly-scheduled Transportation Subcommittee meetings.

A project website has been publicly accessible since 2008. The website is accessed via the City of Gresham’s website, at: http://greshamoregon.gov/city/city-departments/environmental-
Conclusion
The Citizen Involvement Goal and its policies are met by the combination of Project Management Team meetings, Transportation Subcommittee meetings, public workshops, individual and small group meetings with Springwater residents, a presentation to City Council and the Planning Commission, and providing information on the proposal on the Oregon Department of Transportation and City of Gresham web sites.

The proposal is consistent with the applicable citizen involvement goals and policies listed in this section.

3. Transportation System Plan Goals and Policies

Section 10.320 – Transportation System Plan

Goal: Plan, implement, and maintain an efficient transportation system.

Policy 1: The City shall coordinate transportation projects, programs, and investment strategies with land use planning, economic development, noise reduction, air quality, water quality, land resource quality and wetlands and stream corridor preservation to implement other Comprehensive Plan goals and policies.

Findings
Goal: The preferred alternative for three major transportation facilities as identified in the IAMP will allow the City to apply for funds to implement a new facility that supports a more efficient and safe transportation system.

Policy 1: Several proposed alternatives for the preferred alternative and the IAMP were considered. The criteria to select a preferred alternative and IAMP included land use, economic development, noise reduction, air quality, water quality, land resource quality, and wetlands and stream corridor preservation factors and weighted them against each other. The criteria are described in further detail in Attachment A of the Springwater TSP, the US 26: Access to the Springwater Community Interchange Area Management Plan, or IAMP.

Conclusion
The Transportation System Plan Goal is supported by the proposed amendments because they will enable the City to attain funds to implement a preferred alternative. Policy 1 is met because the preferred alternative was developed with these factors considered.

4. Springwater Plan District

Section 10.805 – Transportation

Goal: The Springwater Community will encompass a well-planned transportation system that supports the Springwater Community Plan, while promoting transit, walking, and bicycling. The road and trail network will provide good connectivity within Springwater, with existing neighborhoods, and with the regional trail network.

Policy 19: Identify improvements to Highway 26 that enhance access and mobility to and through the Springwater Community Plan are to support industrial and employment development. Design elements are to be supportive of the Springwater Community Plan.

Findings
Goal: The proposed amendments support a well-planned transportation network that provides enhanced access for vehicles as well as pedestrians and bicyclists. The preferred alternative includes an overpass of US 26 to enhance safe crossing of freight, pedestrians, and bicyclists that will connect existing and planned communities on the east and west sides of the Springwater Plan Area.
Policy 19: The preferred alternative and IAMP enhance access and mobility by eliminating an at-grade crossing of US 26 and a new arterial and new collector road to link to the existing and planned street and trail networks as well as the Springwater Corridor Trail. The improvements as proposed will support future Springwater industrial and employment development.

Conclusion
The Transportation Goal of the Springwater Plan District is supported by the proposed amendments because the proposed amendments connect employment areas, support industrial and employment development, and eliminate an unsafe at-grade crossing of US 26. The preferred alternative concept design has been developed to accommodate multi-modal traffic.

B. COMMUNITY DEVELOPMENT CODE PROCEDURES

1. Section 11.0200 - Initiation and Classification of Applications. This section requires that an amendment to the Community Development Code and the Community Development Plan be a legislative action under the Type IV Procedure pursuant to this section. This section applies to this proposal, as it is an amendment to the Community Development Code and the Community Development Plan.

2. Section 11.0600 - Type IV Legislative Procedures. This section requires the Planning Commission to hold a public hearing and make a recommendation to the Council. The Council holds another public hearing and makes a final decision. Interested persons may present evidence and testimony relevant to the proposal. The Planning Commission and Council make findings for each of the applicable criteria. The section also provides for a hearing process consistent with Section 11.0300. Both the Planning Commission and the City Council, at public hearings in conformance with provisions of this section, will consider this proposal. Findings are made for the applicable criteria in this report or as revised in the record.

3. Section 11.1000 - Public Hearings. For a Type IV Comprehensive Plan Amendment this section requires that hearings be scheduled, a notice published in a newspaper of general circulation in the City and a copy of the decision be mailed to those required to receive such notice. Required notice of public hearing for these proposed text amendments were published in the Gresham Outlook on December 1, 2010, as required by this section. The Planning Commission will make a recommendation and the Council will make a decision that will be based on findings of fact contained in this report and in the hearings record and a decision will be sent to those who participated in the hearings. A decision shall be made accompanied by findings and an order.

C. STATEWIDE PLANNING GOALS

This section identifies applicable Statewide Planning goals for this Comprehensive Plan Amendment.

Statewide Planning Goal 12: Transportation Planning

Findings
Statewide Planning Goal 12 requires local governments to plan and develop transportation facilities and services in close coordination with urban and rural development.

Oregon Administrative Rules (OARs) interpret and implement State laws and policies such as the Statewide Planning Goals. OAR 600-012-0000 is that part of the Goal 12 OARs which apply to preparation and coordination of Transportation System Plans. It has requirements that must be addressed in the City's Community Development Plan Volume IV, Transportation System Plan. The following lists the applicable requirement and describes how it is addressed by the proposed amendments:
1. Cities and counties shall prepare, adopt, and amend local TSPs for lands within their planning jurisdiction in compliance with this division.

Gresham's Transportation System Plan for Springwater identifies the general location of a new interchange along US 26 in the vicinity of 267th Avenue as well as a new arterial road and a new collector road. The proposed amendments to the TSP address the need to amend the TSP to identify the preferred alternative for these facilities and to incorporate the IAMP report as an attachment to the TSP.

Proposed Amendment: Revisions to the TSP text include new language that describes the process that was completed to adopt a preferred alternative for the Springwater IAMP. The revisions also include text regarding phasing of the construction of this project, deletion of previously considered alternatives, and incorporates the US 26: Access to the Springwater Community Interchange Area Management Plan, or IAMP as an attachment to the TSP.

Conclusion
The proposed amendments will make the TSP comply with Statewide Planning Goal 12.

SECTION VI
CONCLUSION

The proposed Comprehensive Plan amendments attached as Exhibit 'A' are consistent with applicable Goals and Policies of the Community Development Plan, the applicable Development Code procedures of the Community Development Plan; and the Statewide Planning Goals as indicated by findings contained or referenced in Section V of this report.

SECTION VII
RECOMMENDATION

Staff recommends adoption of the proposed Comprehensive Plan Code amendments as contained in the attached Exhibit 'A'.

End of Staff Report