

Interchange Area Management Plan

I-82/LAMB ROAD

Umatilla County, Oregon

August 2014



Prepared for:



Prepared by:



KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING/PLANNING

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I-82/Lamb Road Interchange Area Management Plan

Umatilla County, Oregon

Draft

*See Final
Later in this binder*

August 2014

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Umatilla County, Oregon

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PREFACE

The development of this plan was guided by the Steering Committee and Technical / Public Advisory Committee (TPAC). The members of these groups are identified below, along with members of the consultant team. The Steering Committee members were also members of the TPAC, who collectively were responsible for reviewing all work products and guiding the planning work. They devoted a substantial amount of time and effort to the development of the I-82/Lamb Road IAMP and their participation was instrumental in the final recommendations that are presented herein.

Steering Committee

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Section 1
Executive Summary

EXECUTIVE SUMMARY

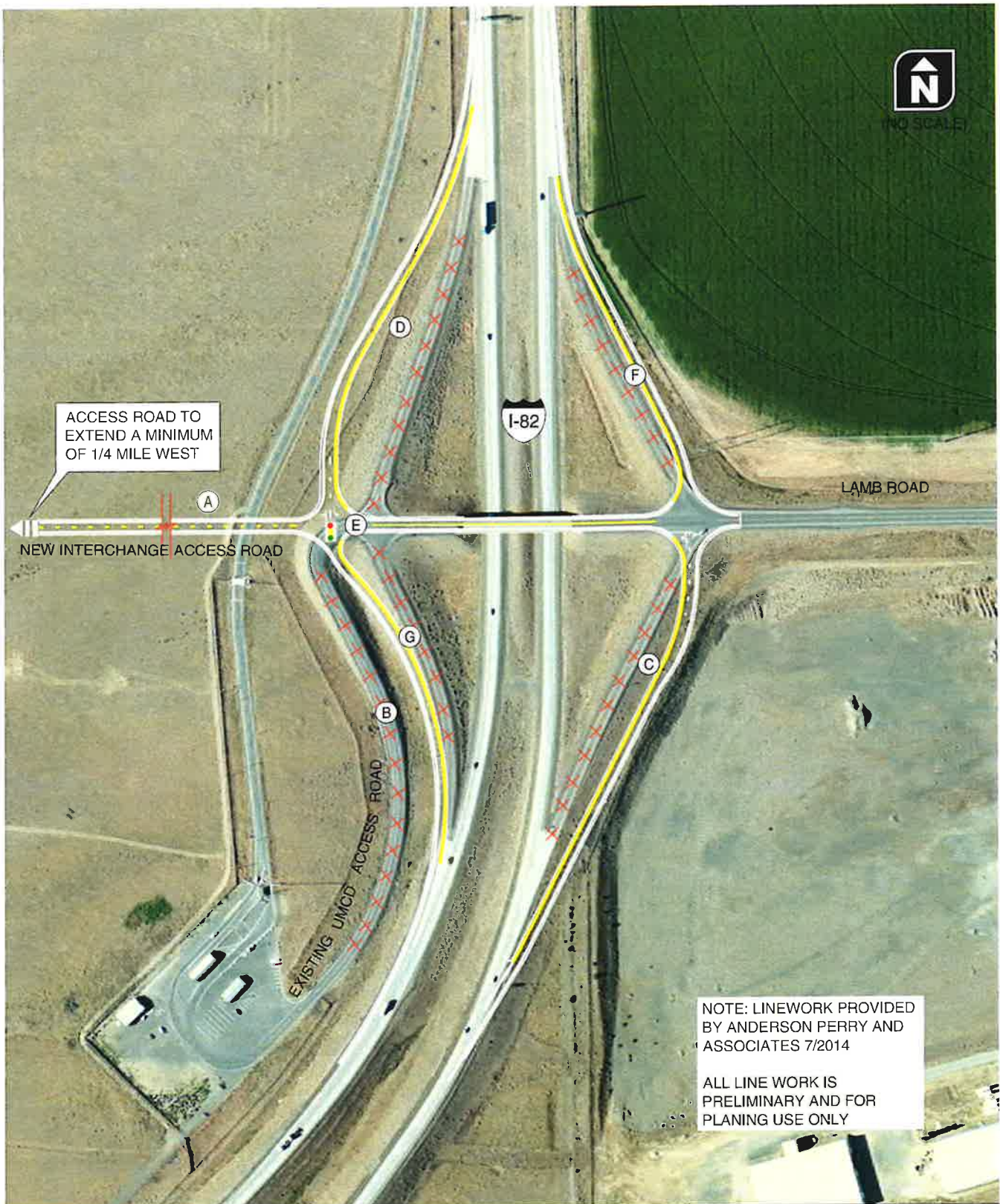
The I-82/Lamb Road Interchange Area Management Plan (IAMP) was prepared to identify and address infrastructure, access, and land use regulations associated with the transition of the Umatilla Army Chemical Depot (UMCD) from a facility that has historically stored/shipped military supplies and disposed of chemical weapons to a facility that will accommodate Oregon National Guard operations, environmental preservation, and new economic development.

The executive summary provides an overview of the project elements that were developed through a collaborative effort of the Project Team, Umatilla Army Depot Reuse Authority, Technical/Public Advisory Committee, Umatilla County, Oregon Department of Transportation (ODOT), and local stakeholders. The following table and figures summarize the identified improvement projects. Additional details are provided herein.

With the identification of near- and long-term infrastructure improvements, a number of policies, ordinances, and other provisions have been developed for adoption into the Umatilla County Transportation System Plan, Comprehensive Plan, and development review ordinances to support and implement the IAMP. The IAMP will also be adopted by the Oregon Transportation Commission as an amendment to the Oregon Highway Plan.




I-82/Lamb Road Interchange (Exit 10)





NOTE: LINEWORK PROVIDED
BY ANDERSON PERRY AND
ASSOCIATES 7/2014

ALL LINE WORK IS
PRELIMINARY AND FOR
PLANING USE ONLY

-  PRELIMINARY ROADWAY ALIGNMENT
-  REMOVE STRUCTURE / ROADWAY
-  IMPROVEMENT (SEE TABLE 1 FOR DESCRIPTION & COST ESTIMATE)

I-82/Lamb Road IAMP
Improvement Plan
Umatilla County, Oregon

Figure
E1

Section 2 Interchange Improvement and Access Management Plan

INTERCHANGE IMPROVEMENT AND ACCESS MANAGEMENT PLAN

INTRODUCTION / BACKGROUND

The Umatilla Army Chemical Depot (UMCD) is formally being decommissioned and prepared for reuse/redevelopment. The Umatilla Chemical Depot Reuse Authority (UMADRA - sometimes referred to as the "LRA" and undergoing a name change to the "Columbia Development Authority") is chartered with administering the transition of the UMCD and is leading the planning process. Following the completion of a Redevelopment Plan in 2010, reuse/redevelopment of the UMCD has been targeted to accommodate a new 7,500 acre Oregon National Guard training base, a 5,678 acre habitat refuge, and approximately 3,000 acres of industrial/warehouse development.

With the transition and reconfiguration of land uses on the UMCD site, it is recognized that transportation patterns and traffic demands will change. Some of these changes will impact the existing I-82/Lamb Road interchange. In accordance with Oregon Administrative Rule 734-051, an Interchange Area Management Plan (IAMP) has been prepared to identify and address future transportation infrastructure needs, access, and land use regulations at this interchange. The remainder of this section contains the planning context, specific interchange infrastructure projects, and access management plan for the IAMP.

Conditions Statement

The I-82/Lamb Road interchange was constructed in 1986 for several reasons, one of which was to provide a secondary point of access to the UMCD site. This secondary point of access became the primary construction and workforce access to the industrial chemical weapons incineration facility that was constructed and recently decommissioned on the site. Outside of these historical UMCD functions, the I-82/Lamb Road interchange has also served adjacent and regional land uses including the Westland Road Exception Area and the City of Hermiston via the Lamb Road/Westland Road corridor.

From the perspective of the UMCD site, the I-82/Lamb Road interchange was designed and constructed at a time in which the primary use of the UMCD was to store/ship military supplies and

Exhibit 1 - I-82/Lamb Road Interchange



6. Collaborate throughout the planning process with design professionals, jurisdictional representatives, developers, local property owners, and the general public, including protected populations as established by federal and state regulations and policies.
7. Comply with the intent of Statewide Planning Goals, including Goal 1: Public Involvement, Goal 2: Land Use Planning, Goal 5: Natural Resources, Goal 6: Air, Water and Land Resources Quality, Goal 7: Areas Subject to Natural hazards, Goal 8: Recreation Needs, Goal 9: Economic Development, Goal 12: Transportation, and Goal 14: Urban Growth Boundaries.
8. Identify phased implementation strategies for identified near- and long-term interchange infrastructure and interchange crossroad improvements.
9. Identify interchange infrastructure funding mechanisms that could be applied to future reuse/redevelopment of the UMCD and other land uses within the Interchange Management Study Area.
10. Develop implementation policies and regulations to be adopted into the Umatilla County Comprehensive Plan, Transportation System Plan, and zoning ordinances, as appropriate.

Interchange Management Study Area (IMSA)

The I-82/Lamb Road IAMP was prepared in conjunction with IAMPs for two other interchanges: I-84/Army Depot Access Road and I-84/Paterson Ferry Road. All three interchanges will be affected to some degree by future redevelopment of the UMCD site. Within the context of the IAMP planning process, the Interchange Management Study Area (IMSA) defines the extent of the detailed land use and infrastructure study area. The IAMPs will focus specifically on the freeway interchanges that serve the UMCD and surrounding land uses. At a minimum, the IMSA includes properties, as well as all access points located within ½ mile of the freeway interchange as defined by the State of Oregon's IAMP Guidelines. In order to capture the overarching land use related impacts of the reuse/redevelopment of the UMCD as well as growth potential of immediately surrounding uses, the IMSA includes the following areas:

- The entire UMCD site
- Westland Road Exception Area – area east of I-82 and north of I-84
- Industrial zoned land located north of the Paterson Ferry Road interchange

The Interchange Management Study Area (IMSA) map is shown in Figure 1.

I-82/LAMB ROAD INTERCHANGE IMPROVEMENT PLAN

A comprehensive transportation improvement plan for the I-82/Lamb Road interchange was developed based on concept screening and evaluations outlined in the Technical Appendix to the IAMP. This plan includes the development of a new interchange access road to serve future reuse of the UMCD site, modifications to the interchange on- and off-ramps, and modifications to the interchange ramp terminals. Each transportation improvement project is described in detail below, illustrated in Figures 2 and 3, and summarized in Table 1.

Near-Term Improvements

Constructed in 1986, the I-82/Lamb Road interchange is structurally sound and adequately supports existing traffic conditions. However, the current configuration includes an existing UMCD interchange access road that is inadequate to safely accommodate intensified levels of development-driven vehicular and heavy truck traffic. Therefore, the following near-term improvements have been identified to address this existing deficiency.

Project A. New Interchange Access Road (Near-Term)

The existing UMCD interchange access road is geometrically limited in its ability to safely and efficiently support future anticipated traffic conditions and vehicle truck types anticipated by reuse of the UMCD site beyond some minor early-phase development. In recognition of this limiting feature of the interchange, Project A includes the construction of a new interchange access road serving the west side of the I-82/Lamb Road interchange. The new access road will connect to the interchange at a more traditional 90 degree angle, include two 12 foot travel lanes, and be to the maximum extent practical, a ¼-mile in length¹ before connecting to a future reuse-oriented internal circulation network. *This improvement would need to be constructed when it is determined (through the local Umatilla County development review process) that the existing interchange access road cannot operationally or geometrically support future vehicular/truck profiles associated with new reuse development.*

Project B. Remove Existing Interchange Access Road (Near-Term)

Project B includes the removal of the existing UMCD access road. *Removal would occur following construction of Project A.*

¹ The minimum ¼-mile roadway length meets the ODOT interchange access management standards.

Longer-Term Improvements

Beyond the construction of the new interchange access road (Project A), the existing I-82/Lamb Road interchange ramps and supporting infrastructure can continue to serve existing and future regional traffic growth. However, it is recognized that this growth coupled with the potential future traffic growth generated by the reuse development on the UMCD site larger IMSA will necessitate the following longer-term interchange improvements.

Project C. Improve I-82 Northbound Off-Ramp (Longer-Term)

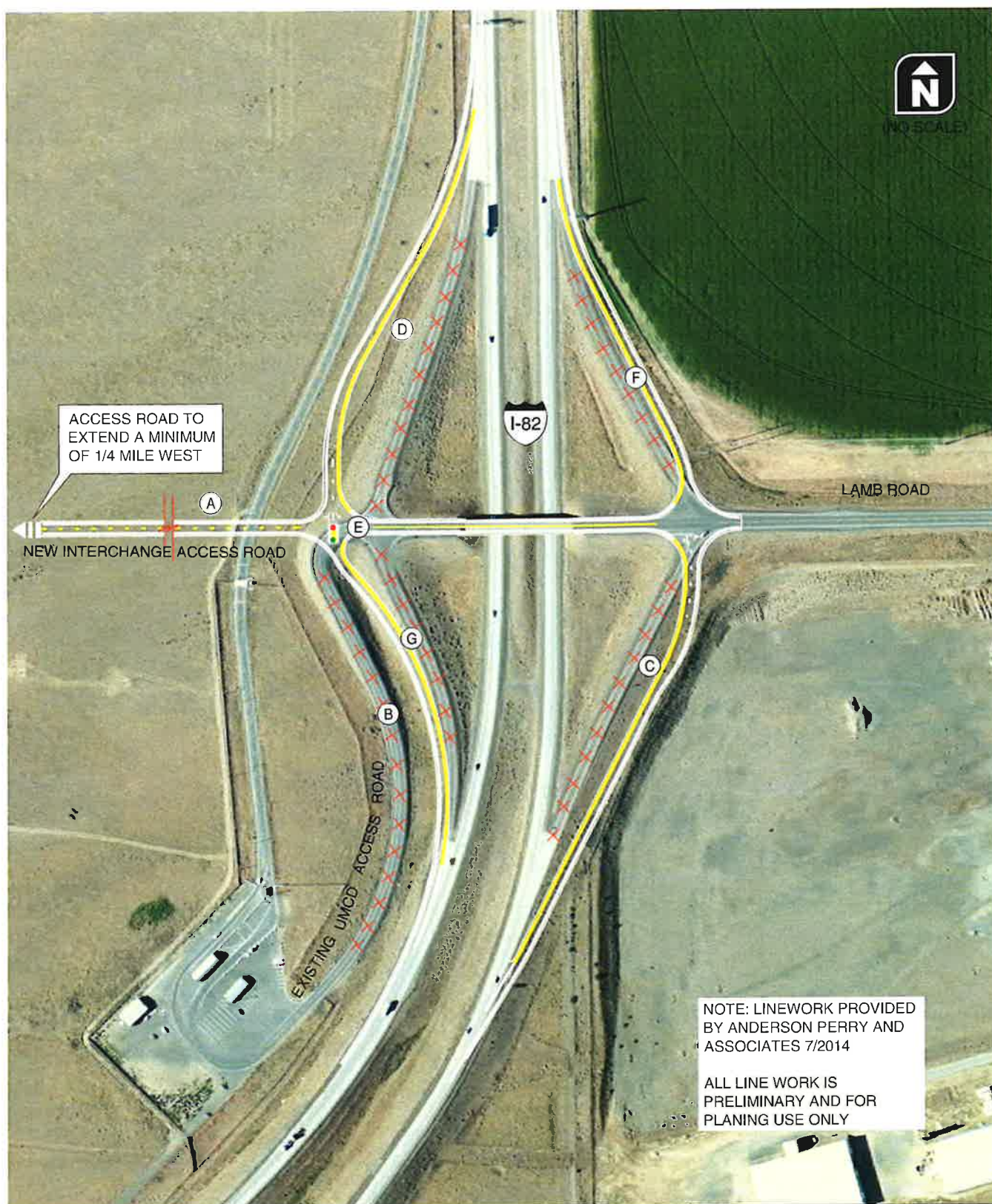
The I-82/Lamb Road interchange was designed and constructed under older design standards for rural applications. As a result, the I-82 northbound off-ramp has characteristics such as a large skew angle at the ramp terminal and limited geometrics that cannot safely and efficiently support the intensified vehicular/truck volumes envisioned to be generated by reuse of the UMCD site. In addition, the single-lane ramp terminal approach lacks adequate long-term capacity and queue storage length to accommodate changing traffic profiles. Project C would lengthen and realign the off-ramp to better accommodate projected long-term demand and widen the approach to Lamb Road to provide a separate through/left-turn lane. In addition, the project sets the stage for a potential long-term construction of a PARCLO A looping on-ramp (see Vision Project H). *These improvements would be constructed when future development-driven traffic studies determine that they are needed for safety and/or operations reasons.*




Project D. Improve I-82 Southbound Off-Ramp (Longer-Term)

The I-82/Lamb Road interchange was designed and constructed under older design standards for rural applications. As a result, the I-82 southbound off-ramp has characteristics such as a large skew angle at the ramp terminal that cannot safely and efficiently support the intensified vehicular/truck volumes envisioned to be generated by reuse of the UMCD site. Project D would lengthen and realign the off-ramp to better accommodate projected long-term demand and widen the approach to Lamb Road to provide a separate left-turn lane. The ultimate alignment of this off-ramp would be positioned to accommodate the potential construction of a looping southbound on-ramp at some point in the longer-term future (see Project H). *These improvements would be constructed when future development-driven traffic studies determine that they are needed for safety and/or operations reasons.*

Project E. Signalize the I-82/Lamb Road Southbound Ramp Terminal (Longer-Term)

Signalization is anticipated to be needed to accommodate anticipated traffic growth at the interchange ramp terminal. *Signalization would be needed when signal warrants are met, but not before Project D is constructed.*



-  PRELIMINARY ROADWAY ALIGNMENT
-  REMOVE STRUCTURE / ROADWAY
-  IMPROVEMENT (SEE TABLE 1 FOR DESCRIPTION & COST ESTIMATE)

I-82/Lamb Road IAMP
Improvement Plan
Umatilla County, Oregon

Figure
2

INTERCHANGE ACCESS MANAGEMENT PLAN

Access locations within the I-82/Lamb Road interchange area were evaluated based on ODOT's Division 51 Access Management standards and an assessment of traffic operations and safety as described in Action 3C.3 of the Oregon Highway Plan. Accordingly, the Access Management Plan (AMP) will preserve the operational integrity and safety of the interchange and primary roadways serving it, while maintaining viable access to all parcels in the IMSA. The AMP contains a plan for actions to be taken on the new interchange access roadway. An AMP is identified for near- and long-term timeframes. The overall AMP is illustrated in Figure 4.

Interchange Access Spacing

Under ODOT's current access management policy, the Oregon Highway Plan stipulates that the desired distance between an interchange ramp terminal and the first full approach (public or private) on the crossroad should be a minimum of 1,320 feet (¼-mile). The first right-in/right-out access should be a minimum of 750 feet from the ramp terminal. Given that the new interchange access road (Project A) will likely be constructed to a minimum length of ¼-mile after ODOT review, the I-82/Lamb Road access management plan identifies this roadway as an access controlled facility. Specifically, the plan calls for ODOT to secure access control along both sides of this new roadway between the southbound ramp terminal and the first point of public/private access (likely to be constructed a minimum length of ¼ mile from the terminal).

ODOT has already secured access control along Lamb Road east of the interchange.

UMCD Local Circulation

As part of a separate planning effort, a local circulation network will be planned to accommodate reuse and new development on the UMCD site in the vicinity of the I-82/Lamb Road interchange. The extent of this network will be planned and developed at a later date and in conjunction with future development opportunities. As such, specific roadway alignments and locations of local roadway intersections will be subject to future land use decisions. However, for the purposes of the IAMP, the local circulation plan will recognize the new I-82/Lamb Road interchange access road (Project A) as an access controlled roadway with the first full point of access likely to be located a minimum length of ¼ from the southbound ramp terminal.

Section 3 Implementation Plan

IMPLEMENTATION PLAN

INTRODUCTION

ODOT and Umatilla County will need to adopt elements of the I-82/Lamb Road IAMP specific to the individual jurisdiction/agency. Since the IAMP involves both State and local government authority, some policies will guide ODOT actions and others will guide Umatilla County decisions. The Oregon Administrative Rule [(OAR 734-051-0155(2))] states that ODOT will work with local governments on any amendments to local comprehensive plans and transportation system plans and local land use and subdivision codes to ensure the proposed IAMP is consistent with the local plan and codes, prior to adoption by the Oregon Transportation Commission (OTC).

It is expected that the IAMP will be made part of the Umatilla County Comprehensive Plan by including it as an amendment to its Transportation System Plans (TSP). This amendment process will require notification and public hearings pursuant to the local legislative process. Umatilla County can adopt the I-82/Lamb Road IAMP document in its entirety or by reference to the existing TSP, can prepare an ordinance that more specifically identifies what parts of the IAMPs are being adopted locally and how local plans and ordinances are being modified, and/or can issue a statement that local plans and ordinances are consistent with the recommendations of the IAMP.

ODOT Region 5 will prepare findings to support adoption of the I-82/Lamb Road IAMP on the State's behalf, and the Oregon Transportation Commission (OTC) will deliberate and adopt the final documents as a facility plan and amendments to the Oregon Highway Plan (OHP). The following is a summary of the proposed actions to implement the IAMP.

PLAN ELEMENTS

Interchange Function and Policy Definition

Umatilla County should adopt a clear definition of the I-82/Lamb Road Interchange function into its comprehensive plan and TSP to provide policy direction for management of the interchange area and achieve the objectives and goals of this IAMP. This will help to ensure consistency between future policy decisions and the interchange's intended function.

The following function and policy definition was developed for the I-82/Lamb Road Interchange:

"The function of the I-82/Lamb Road interchange is to provide primary access for future reuse/development on the UMCD site and continue to accommodate traffic growth within the larger IMSA and region. As the internal road system develops to serve UMCD reuse/development, this interchange will also provide secondary access to training and operational activities performed by the Oregon National Guard on the former Umatilla Army

- Will amend the Comprehensive Plan Map and Zoning Map to include an Interchange Management Area to identify where compliance with the I-82 / Lamb Road IAMP will be a condition of future development approval.
- Will amend the Development Code to require that development and redevelopment proposals within the Interchange Management Area show consistency with the IAMP and to allow the County to require improvements as a condition of approval. Amendments will ensure that proposals for new development within the UMCD and larger IMSA will be reviewed to determine if a need for different interchange improvement phases is triggered. Amendments to the following sections are recommended:
 - Section 152.018 Access Management and Street Connectivity
 - Section 152.019 Traffic Impact Analysis
- Consider adoption of a Supplemental Transportation System Development Charge (SDC) to finance specific improvements to the I-82 / Lamb Road interchange;
- Work with ODOT to identify and pursue funding for all I-82/Lamb Road interchange projects identified in this IAMP.

MONITORING ELEMENTS

The purpose of the IAMP is to ensure that capacity at the interchange is preserved for its intended function. While a long-range plan, the IAMP needs to remain dynamic and responsive to development and changes to the adopted land use and transportation plans and may need to be periodically reviewed and updated. To accomplish this goal, a monitoring program is included that identifies triggers for reviewing the IAMP and assessing how development approval within the IAMP Management Area will be reviewed and coordinated.

IAMP Review Triggers

Periodically, the implementation program shall be evaluated by ODOT and Umatilla County to ensure it is accomplishing the goals and objectives of the IAMP. Events that may trigger an IAMP review include:

- Plan map and zone changes that have a “significant affect” pursuant to the Transportation Planning Rule (OAR 660-012-0060) and impact the I-82/Lamb Road Interchange, or that are located within the IAMP Management Area.
- Proposed development that generates expected traffic volume at the I-82/Lamb Road ramp terminals that exceed the adopted mobility targets.

In addition to the established triggers for IAMP review, either agency may request a formal review of the IAMP at any time if, in their determination, specific land use or transportation changes warrant a review of the underlying assumptions and/or recommendations within the IAMP. If the participants in the IAMP review agree that, once the impacts of the “trigger” that necessitated the review are

provisions will be amended in the County's TIA requirements (§152.019.B.2). These requirements will be specific to all future development located within the UMCD boundary of the larger IMSA. The entire TIA requirements with these new special provisions are included below with the new language underlined.

§ 152.019 TRAFFIC IMPACT STUDY.

(A) Purpose: The purpose of this section of the code is to implement Section 660-012-0045 (2) (e) of the State Transportation Planning Rule that requires the County to adopt a process to apply conditions to specified land use proposals in order to minimize adverse impacts to and protect transportation facilities. This section establishes the standards for when a proposal must be reviewed for potential traffic impacts; when a Traffic Impact Analysis must be submitted with an application in order to determine whether conditions are needed to minimize impacts to and protect transportation facilities; what must be in a Traffic Impact Analysis; and who is qualified to prepare the analysis.

(B) Applicability: A Traffic Impact Analysis shall be required to be submitted to the County with a land use application, apply:

(1) A change in plan amendment designation; or

(2) The proposal is projected to cause one or more of the following effects, which can be determined by field counts, site observation, traffic impact analysis or study, field measurements, crash history, Institute of Transportation Engineers Trip Generation manual; and information and studies provided by the local reviewing jurisdiction and/or ODOT:

(a) An increase in site traffic volume generation by 250 Average Daily Trips (ADT) or more (or as required by the County Engineer). The latest edition of the Trip Generation manual, published by the Institute of Transportation Engineers (ITE) shall be used as standards by which to gauge average daily vehicle trips; or

(b) An increase in use of adjacent streets by vehicles exceeding the 10,000 pound gross vehicle weights by 20 vehicles or more per day; or

(c) The location of the access driveway does not meet minimum intersection sight distance requirements, or is located where vehicles entering or leaving the property are restricted, or vehicles queue or hesitate, creating a safety hazard; or

(d) A change in internal traffic patterns that may cause safety problems, such as back up onto the highway or traffic crashes in the approach area; or

(e) Any development proposed within the UMCD boundary of the I-84/Lamb Road or I-84/Army Depot Access Road Interchange Area Management Plan (IAMP) Management Area prior to the completion of near-term improvements projects (Projects A and B) identified in the I-82/Lamb Road IAMP; or

Analysis shall include mitigation measures that meet the County's Level-of-Service and/or Volume/Capacity standards and are satisfactory to the County Engineer, and ODOT when applicable; and

(3) The proposed site design and traffic and circulation design and facilities, for all transportation modes, including any mitigation measures, are designed to:

- (a) Have the least negative impact on all applicable transportation facilities;
- (b) Accommodate and encourage non-motor vehicular modes of transportation to the extent practicable;
- (c) Make the most efficient use of land and public facilities as practicable;
- (d) Provide the most direct, safe and convenient routes practicable between on-site destinations, and between on-site and off-site destinations; and
- (e) Otherwise comply with applicable requirements of the Umatilla County Code.

(E) Conditions of Approval: The County may deny, approve, or approve a proposal with appropriate conditions.

(1) Where the existing transportation system is shown to be impacted by the proposed action, dedication of land for streets, transit facilities, sidewalks, bikeways, paths, or accessways may be required to ensure that the transportation system is adequate to handle the additional burden caused by the proposed action.

(2) Where the existing transportation system is shown to be impacted by the proposed action, improvements such as paving, curbing, installation or contribution to traffic signals, construction of sidewalks, bikeways, accessways, paths, or streets that serve the proposed action may be required.

OREGON DEPARTMENT OF TRANSPORTATION / UMATILLA COUNTY COORDINATION

Following adoption of the I-82/Lamb Road IAMP, ODOT and Umatilla County will need to coordinate future development activities on the UMCD site. The following describes steps both ODOT and Umatilla County will take when reviewing development proposals that may impact the I-82/Lamb Road interchange. Umatilla County shall provide notice to the Oregon Department of Transportation (ODOT) on TIA studies when the site of the proposal is adjacent to or otherwise affects a State highway.

Section 4 OAR & OHP Compliance

OAR AND OHP COMPLIANCE

The following section discusses the Oregon Administrative Rule (OAR) and Oregon Highway Plan (OHP) policy-based compliance issues that pertain to the development of the I-82/Lamb Road IAMP.

OAR COMPLIANCE

The I-82/Lamb Road IAMP was developed in collaboration with UMADRA, Umatilla County, and ODOT and was developed in accordance with the guidelines set forth in the State of Oregon's Administrative Rules for Interchange Access Management Planning and Interchange Area Management Planning. Table 6 identifies the required planning elements from OAR 734-051 and documents how the IAMP satisfies the requirements.

Table 2 – I-82/Lamb Road IAMP OAR Compliance

OAR 734-0051-0155 Requirement	How OAR is Addressed	Document Reference
Should be developed no later than the time the interchange is being developed or redeveloped -7010(7)(a)	This plan was developed to effectively plan for future development and traffic growth that could occur within the interchange area. Future improvements will be needed to safely accommodate forecast increases in vehicular and truck demand.	IAMP Technical Appendix "G"
Should identify opportunities to improve operations and safety in conjunction with roadway projects and property development or redevelopment and adopt strategies and development standards to capture those opportunities -7010(7)(b)	The access management, transportation improvement plan, and Interchange Management Area elements identified in this plan will result in operational, safety, and capacity improvements.	IAMP Section 2
Should include short, medium, and long-term actions to improve operations and safety in the interchange area -7010(7)(c)	The IAMP includes a phasing plan for the transportation system improvements presented within the plan. These improvements address the near term needs identified by the existing conditions analysis as well as long-term demand needs that are expected to occur beyond the 20-year horizon period. In addition, near-term improvement projects are included in the plan to address access road deficiencies to the interchange.	IAMP Section 2
Should 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 -7010(7)(d)	A full analysis of existing and forecast operational and geometric conditions was conducted for this planning effort. The future volumes were developed based on approved zoning and comprehensive plan designations.	IAMP Technical Appendices "D", "E", & "G"
Should provide adequate assurance of the safe operation of the facility through the design traffic forecast period, typically 20 years -7010(7)(e)	Specific improvements are included in the plan to address safety concerns through improved geometric alignment and access spacing.	IAMP Section 2
Should consider existing and proposed uses of all property in the interchange area consistent with its comprehensive plan designations and zoning	A thorough analysis of surrounding land uses and land use potential was performed based on the current and approved comprehensive plan designations and zoning.	IAMP Technical Appendices "D", "E", & "G"

Policy 1C: State Highway Freight System. This policy recognizes the need for the efficient movement of freight through the state. I-84 and I-82 are designated Freight Routes.

How Addressed: The transportation projects included in the plan were developed considering freight mobility needs, particularly at the NB and SB ramp terminals and new interchange access road.

Policy 1F: Highway Mobility Standards Access Management Policy. This policy addresses state highway performance expectations, providing guidance for managing access and traffic control systems related to interchanges.

How Addressed: The I-82/Lamb Road IAMP demonstrates that the interchange and surrounding transportation system will be able to meet ODOT mobility targets through the 20-year horizon.

Policy 1G: Major Improvements. This policy requires maintaining performance and improving safety by improving efficiency and management before adding capacity.

How Addressed: The I-82/Lamb Road IAMP focuses on improving the geometry of the existing interchange to improve efficiency and safety, adding capacity only where needed.

Policy 2B: Off-System Improvements. This policy recognizes that the state may provide financial assistance to local jurisdictions to make improvements to local transportation systems if the improvements would provide a cost-effective means of improving the operations of the state highway system.

How Addressed: The transportation system was considered as a whole with improvements to the state and local system equally considered.

Policy 2F: Traffic Safety. This policy emphasizes the state's efforts to improve safety of all uses of the highway system. Action 2F.4 addresses the development and implementation of the Safety Management System to target resources to sites with the most significant safety issues.

How Addressed: The new interchange access road will be reconstructed to eliminate existing geometric deficiencies. In addition, the access management plan was developed to ensure the long-term safety of the interchange area.

Policy 3A: Classification and Spacing Standards. This policy addresses the location, spacing, and type of road and street intersections and approach roads on state highways. The adopted standards can be found in Appendix C of the Oregon Highway Plan.

How Addressed: See Policy 3C below.

Policy 3C: Interchange Access Management Areas. This policy addresses management of grade-separated interchange areas to ensure safe and efficient operation between connecting roadways. Action items include developing interchange area management plans to protect the function of the

C

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C