

## APPENDIX D: ACCESS POINT DECISION REPORT PROCESS

This appendix summarizes the access point decision report (APDR) process connected with the proposed Forest Lane Interchange on I-84, which is a component of the proposed Cascade Locks Resort and Casino Project.

### APDR Process and Requirements

The Federal Highway Administration (FHWA) requires a thorough evaluation of proposals to modify Interstate highway access (Federal Register, 1998<sup>1</sup>). The APDR documents the federally-required process by which the FHWA evaluates proposals to modify access to the interstate highway system. The process has eight elements, or “policy points,” as follows:

#### Point 1:

*“The existing interchanges and/or local roads and streets in the corridor can neither provide the necessary access nor be improved to satisfactorily accommodate the design-year traffic demands while at the same time providing the access intended by the proposal.”*

#### Point 2:

*“All reasonable alternatives for design options, location, and transportation system management type improvements (such as ramp metering, mass transit, and HOV facilities) have been assessed and provided for if currently justified, or provisions are included for accommodating such facilities if a future need is identified.”*

#### Point 3:

*“The proposed access point does not have a significant adverse impact on the safety and operation of the Interstate facility based on an analysis of current and future traffic. The operational analysis for existing conditions shall, particularly in urbanized areas, include an analysis of sections of Interstate to and including at least the first adjacent existing or proposed interchange on either side. Crossroads and other roads and streets shall be included in the analysis to the extent necessary to assure their ability to collect and distribute traffic to and from the interchange with new or revised access points.”*

#### Point 4:

*“The proposed access connects to a public road only and will provide for all traffic movements. Less than “full interchanges” for special purpose access for transit vehicles, for HOV’s, or into park and ride lots may be considered on a case-by-case basis. The proposed access will be designed to meet or exceed current standards for Federal-aid projects on the Interstate System.”*

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<sup>1</sup> Federal Register: February 11, 1998 (Volume 63, Number 28)]

Point 5:

*“The proposal considers and is consistent with local and regional land use and transportation plans. Prior to final approval, all requests for new or revised access must be consistent with the metropolitan and/or statewide transportation plan, as appropriate, the applicable provisions of 23 CFR part 450 and the transportation conformity requirements of 40 CFR parts 51 and 93.”*

Point 6:

*“In areas where the potential exists for future multiple interchange additions, all requests for new or revised access are supported by a comprehensive Interstate network study with recommendations that address all proposed and desired access within the context of a long-term plan.”*

Point 7:

*“The request for a new or revised access generated by new or expanded development demonstrates appropriate coordination between the development and related or otherwise required transportation system improvements.”*

Point 8:

*“The request for new or revised access contains information relative to the planning requirements and the status of the environmental processing of the proposal.”*

Before any change can be made to the access to I-84, such as the proposed Forest Lane Interchange, the FHWA requires a review of the relationship of the proposed change to the eight policy points. That review is conducted through the preparation of the APDR.

To have the access modification approved, the APDR must document that:

- The local roadway system will not have the capacity, even with improvements, to provide the access requested for a horizon that is 20 years after the opening of the requested access modification.
- A wide range of alternatives has been considered along with the desired access modification.
- The interstate will operate acceptably in the horizon year with the requested access modification.
- The access modification provides, ideally, for movement of traffic in all directions through public street connections.
- The access modification is consistent with local, regional and statewide land use and transportation plans – which include any state spacing and design requirements.
- If multiple future access modifications are possible, the proposed access modification will remain appropriate as each of those future access

modifications are implemented, i.e., a system-level analysis of the proposed modification is necessary.

- Any non-interstate roadway improvements that are expected or are needed to be in-place concurrent with the proposed access modification are sufficiently coordinated so that there is a reasonable expectation that the access modification will operate as predicted.
- Necessary planning or environmental reviews can be completed prior to final approval of the proposed access modification.

A draft APDR has been prepared to document the development and evaluation of alternatives that are required in the consideration of the proposed access modification.

## **Developing an Operationally Acceptable Alternative**

Interstate access approval is a two-step process that is intended to identify fatal flaws and ensure that the time and effort invested in the environmental documentation is not wasted in studying unacceptable access alternatives. The first step in the process is the finding of operational and engineering acceptability of an alternative and the second step is the final approval of new access to the Interstate. Since this final approval is a federal action, it cannot precede the completion of the environmental document.

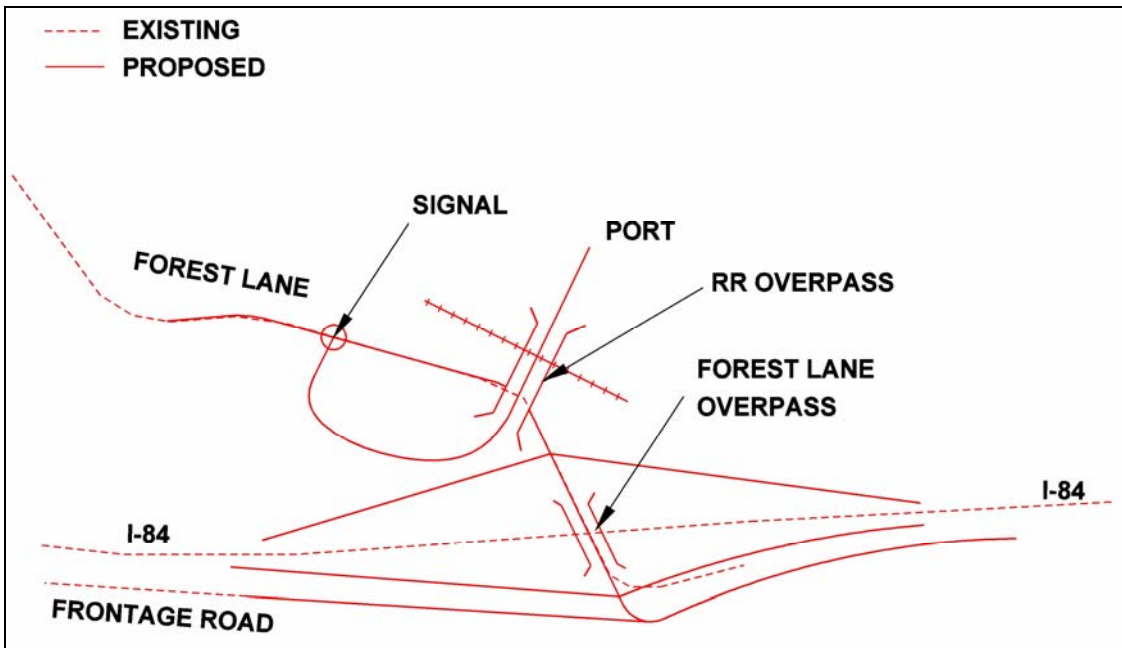
An access alternative that addresses, and is consistent with, the eight policy points and does not adversely affect mainline freeway safety and operations may be considered an “operationally acceptable alternative” (OAA). The process for developing an OAA for the proposed access modification began with the Tribe’s proposal for Forest Lane Interchange as part of the proposed resort and casino project. The process involved the consideration of an extensive array of alternatives, as required by the federal policy. This section summarizes the process for the development of the OAA being examined in the APDR.

### **Applicant’s Proposal**

The Tribe proposed to fund the construction of a new diamond-style interchange at the existing Forest Lane overcrossing as a component of its proposed fee-to-trust transfer to develop a resort and casino within the Port of Cascade Locks Industrial Park. Prior to the commencement of the formal APDR process, several concepts were developed by the Tribe. To meet Oregon Department of Transportation (ODOT) spacing standards for local street connections in the vicinity of an interchange (commonly referred to as the Division 51 standards), a loop road arrangement was proposed, creating a new grade-separated connection between Forest Lane and the Port’s Industrial Park (which would also cross over the UPRR).<sup>2</sup> The original concept proposed by the Tribe did not meet access spacing standards, and alternatives were subsequently developed to address that issue. Figure 1 illustrates the applicant’s original interchange proposal.

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<sup>2</sup> The Forest Lane/loop road intersection would be 1,287 feet from the closest interchange ramp, which is closer than ODOT Division 51 standards allow, but moving the intersection further to the west (to achieve the spacing standard) would increase the impacts on cultural (Historic Columbia River Highway) and natural (Herman Creek riparian area) resources.



**Figure 1: Applicant’s Proposal for Forest Lane Interchange**

### **Alternative Development**

Policy point 2 requires that “All reasonable alternatives for design options, location, and transportation system management type improvements ... have been assessed and provided ....” Addressing this policy point requires evaluation of all reasonable alternatives short of providing new interstate access. Only if the alternatives with no new access fail to achieve the desired goals are new access alternatives to be considered.

To assist BIA in preparing the APDR, an access working group (AWG) was established, consisting of representatives of ODOT, FHWA, City of Cascade Locks, Port of Cascade Locks and the Tribe. The AWG met in December 2005 to develop alternatives for consideration in the APDR and detailed evaluation criteria. A total of 23 alternatives were initially developed by the AWG (not including options involving the closure of the Herman Creek Interchange). The alternatives ranged from improvements to the local roadway system without modifications to the access to I-84, to new interchange options at the west, central, and east areas of the city. Table 1 provides a listing of the alternatives considered with a summary of the features of each.

Table 1: Initial Access Alternatives for Evaluation		
Class of Alternative	Identifier	Features
Local Improvements	A1 5-Lane Local Arterial South of I-84	Complete West Cascade Lock Interchange Southern east-west 5-lane arterial Cross I-84 on a reconstructed Forest Lane crossing
	A2 5-Lane Local Arterial South of I-84 with Moody/Ruckel Connections	A1 Improve Moody Ave. and Ruckel St undercrossings of I-84 connecting WaNaPa with 5-Lane Local Arterial
	B1 5-Lane Local Arterial North of I-84	Use existing partial West Cascade Locks and Herman Creek interchanges Widen WaNaPa, Forest Lane, Frontage Road to 5-lanes Overcrossing of UPRR
	B2 5-Lane Local Arterial North of I-84, West Entrance	B1 New access bridge over Herman Creek and railroad.
	L1 3-Lane Local Collector South of I-84	3-lane collector roadway Moody Ave. and Ruckel St. undercrossings of I-84 Forest Lane overcrossing of I-84 No access modifications to I-84
	L2 3-Lane Local Collector South of I-84 with New Entrance to Port's Industrial Park	L1 New bridge from Forest Lane overcrossing of I-84 extends across UPRR into Port's Industrial Park "T" Forest Lane into new access to Port's Industrial Park.
	L6 Alternative Modes	Use Amtrak station in Stevenson; shuttle across Bridge of the Gods or use water taxi
Modified Interstate Access	L3 Complete East Cascade Locks Interchange	Complete East Cascade Locks Interchange Use existing Frontage Road and Forest Lane Off-ramp to Weigh Station split On-ramp from Weigh Station braided over eastbound off-ramp and WaNaPa
	L4 Complete Herman Creek Interchange	Complete Herman Creek Interchange Widen Frontage Road to 3 lanes Use Forest lane overpass New bridge over UPRR into Port's Industrial Park
	L7 Bridge of the Gods Interchange	Provide direct connection between the Bridge of the Gods through a new interchange with I-84 Close West Cascade Interchange Use new east-west 3-lane collector and Frontage Road to reach Port's Industrial Park Bridge over UPRR into Port's Industrial Park

Table 1: Initial Access Alternatives for Evaluation		
Class of Alternative	Identifier	Features
	11 Full Herman Creek Interchange	Complete Herman Creek Interchange Widen Frontage Road to 5 lanes Reconstruct Forest Lane overpass Bridge over UPRR into Port's Industrial Park
	12 or L5 Northerly Route ("Golden Gate")	Complete Herman Creek Interchange Relocate Frontage Road Bridge over UPRR north of interchange Large bridge from Government Rock to Port's Industrial Park
	13 or L3 Full East Cascade Locks Interchange	Complete East Cascade Locks Interchange Widen Frontage Road to 5 lanes Reconstruct Forest Lane overpass Bridge over UPRR into Port's Industrial Park
	14 East Cascade Locks – Forest Lane Consolidation	Close East Cascade Locks Interchange Close Herman Creek Interchange WaNaPa would remain connected to Frontage Road under I-84 New diamond interchange between Weigh Station and Forest Lane overcrossing New access road to Port's Industrial Park from interchange with bridge over Forest Lane, UPRR, and Herman Creek Forest Lane connected to new access road
	21A/22A Forest Lane Tight Diamond	Construct full diamond at Forest Lane overpass Signalize access to Port's Industrial Park Close Herman Creek interchange Option 22A keeps Herman Creek interchange open.
	21B/22B Forest Lane SPUI	Construct single-point urban interchange at Forest Lane overpass New access road to Port's Industrial Park bridges over UPRR and Forest Lane then connects to Forest Lane at intersection west of existing industrial park access Close Herman Creek interchange 22B keeps Herman Creek interchange open
	21C/22C Weigh Station Split Diamond	Construct split diamond between East Cascade Locks Interchange and Forest Lane overpass Westbound off ramp and eastbound on ramp at Forest Lane overpass Eastbound off ramp and westbound on ramp at (weigh station) Signalize ramps and access to Port's Industrial Park Close Herman Creek interchange. 22C keeps Herman Creek interchange open
	21D/22D Forest Lane Button Hook	Construct new interchange at Forest Lane overpass Westbound off-ramp goes under the Forest Lane overpass at I-84. Access road to Port's Industrial Park signalized and westbound off/westbound on-ramp aligned as fourth leg of intersection Eastbound off/eastbound on in typical diamond configuration Close Herman Creek interchange 22D keeps Herman Creek interchange open.

Table 1: Initial Access Alternatives for Evaluation		
Class of Alternative	Identifier	Features
	21E/22E Forest Lane Flyover	Flyover ramps to/from west to access road intersection with Forest Lane Signalize intersection of west ramps to access road Partial diamond to Forest Lane at overpass for westbound off/eastbound on Close Herman Creek Interchange. 22E keeps Herman Creek interchange open
	21G/22G Forest Lane Roundabouts	Construct full diamond interchange at Forest Lane overpass Use roundabouts at the end of the ramps Roundabout at Forest Lane, industrial park access, and westbound ramps on structure so that access to Port's Industrial Park overcrosses UPRR Close Herman Creek interchange 22G keeps Herman Creek interchange open.
	21H/22H New Forest Lane Diamond	Construct full diamond interchange west of Forest Lane overpass Interchange road bridges over Forest Lane and UPRR north of I-84 and bridges over Frontage Road south of I-84 Connection of interchange road with Frontage Road access between new interchange and Forest Lane overpass Close Herman Creek interchange 22H keeps Herman Creek interchange open.
	21I/22I Frontage Road Flyover	Relocated Frontage Road flies over I-84 west of Forest Lane overpass where diamond interchange is constructed. New access road intersects Forest Lane at signal. Old Frontage Road cul-de-sac west of Forest Lane overpass. Herman Creek Interchange closed 22I keeps Herman Creek Interchange open.
	21J/22J Forest Lane Interchange	Construct new diamond interchange at realigned Forest Lane overpass Realign Frontage Road south of interchange to connect with Forest Lane east of new interchange Access to industrial park bridges over UPRR and Forest Lane Access to industrial park from Forest Lane by a ramp that intersects with Forest Lane to the west of existing access road Herman Creek Interchange closed 22J keeps Herman Creek Interchange open.

## Alternative Screening

The AWG reviewed an initial technical screening of the 23 alternatives on January 19, 2006. Subsequently, comments from the AWG, as well as more substantive ODOT comments, were considered and incorporated. The criteria that were used to narrow the alternatives are shown in Table 2.

Based on the screening criteria, the AWG reduced the 23 alternatives to five. Most alternatives were screened out because:

- They involved five-lane roadways that extended across Cascade Locks which would be inconsistent with the City's Transportation System Plan (TSP).
- They had large potential environmental impacts.
- They would require dramatic deviations from the ODOT local street intersection spacing standards.

Table 2: Screening Criteria	
Criteria	Explanation
General Compliance with FHWA APDR Guidelines	How clearly does the alternative appear to meet FHWA interstate guidelines for access?
General Compliance with ODOT Interchange Spacing Guidelines	Is the interchange spaced to meet ODOT standards?
General Compliance with Division 51 Spacing Standards	Does the interchange concept meet Division 51 standards? Is the location of the interchange in an area that is compatible with local land use?
Highway Operational Impacts	Does the interchange concept allow feasible highway operations?
Impacts to Local Roadways	Does the alternative appear to create negative impacts for the local roadway system or relieve existing impacts?
Local Plan Compatibility	Does the alternative appear compatible with the local transportation and land use plans?
Natural Environment Concerns	Does the alternative appear to have significant impacts to the natural environment that would need to be mitigated?
Visual Impacts	Does the alternative involve massive structures that are likely to be visually intrusive?
Socioeconomic Concerns	Would the alternative appear to involve significant displacements of people or businesses? Would the alternative substantially change the character of established business or residential areas?
Cultural Resource Concerns	Does the alternative have the potential of adverse impacts to the Historic Columbia River Highway?
Public and/or Community Support	Would an alternative likely generate either public/community support and/or opposition?
Constructability	Does an alternative appear to be constructible?

The five remaining alternatives after screening were:

1. A "pure" local option (called L2) that relies on the existing interstate access and local streets proposed in the City of Cascade Locks TSP;
2. Full (complete the East Cascade Locks Interchange with access to Port's Industrial Park via Frontage Road and Forest Lane (combination of Alternatives L3 and 13);
3. Full Herman Creek Interchange with access to Port's Industrial Park via Forest Lane (Alternative 11);
4. Single point urban interchange (SPUI) at Forest Lane (Alternative 21B); and
5. Diamond interchange at Forest Lane (Alternative 21J).

These alternatives are illustrated in Figures 2 through 6.

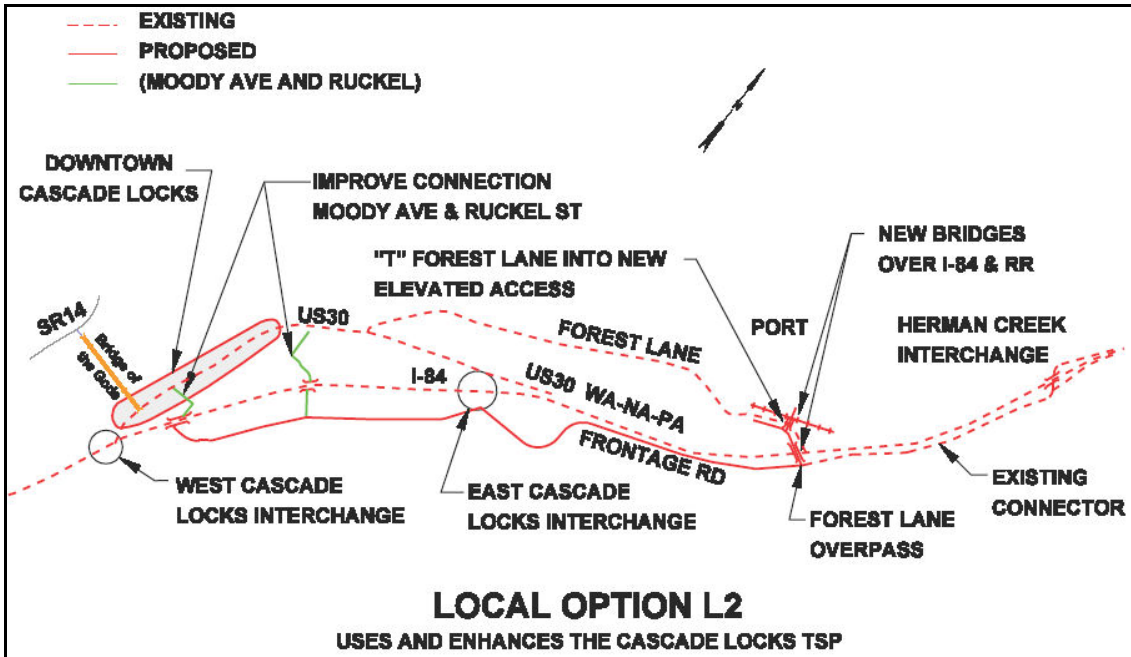


Figure 2: Local System Only (Alternative L2)

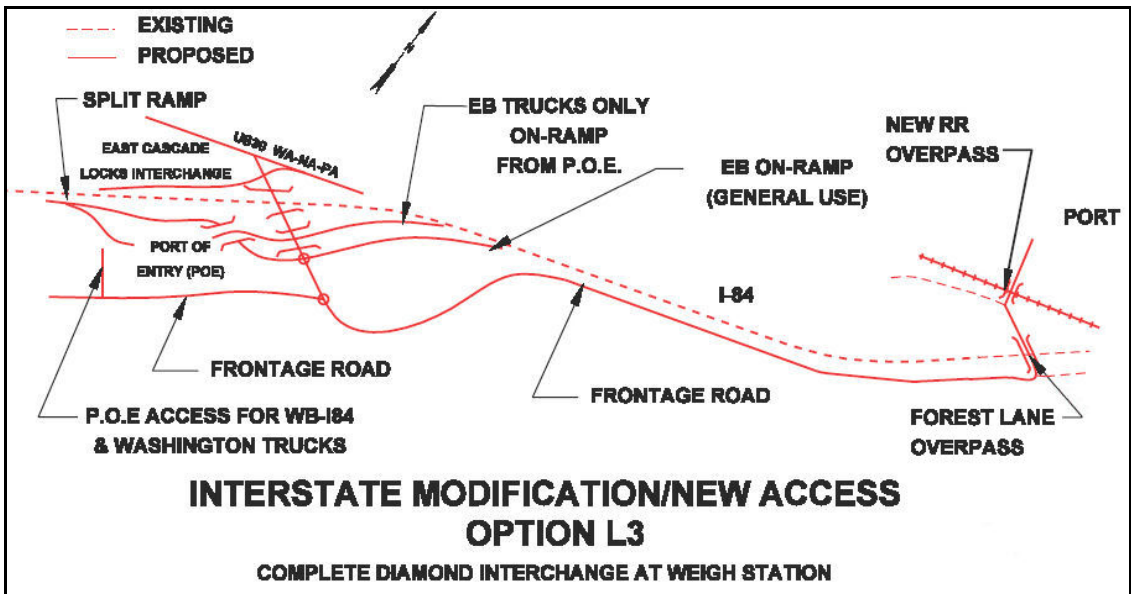


Figure 3: Full East Cascade Locks Interchange (Combination of Alternatives L3 and 13)

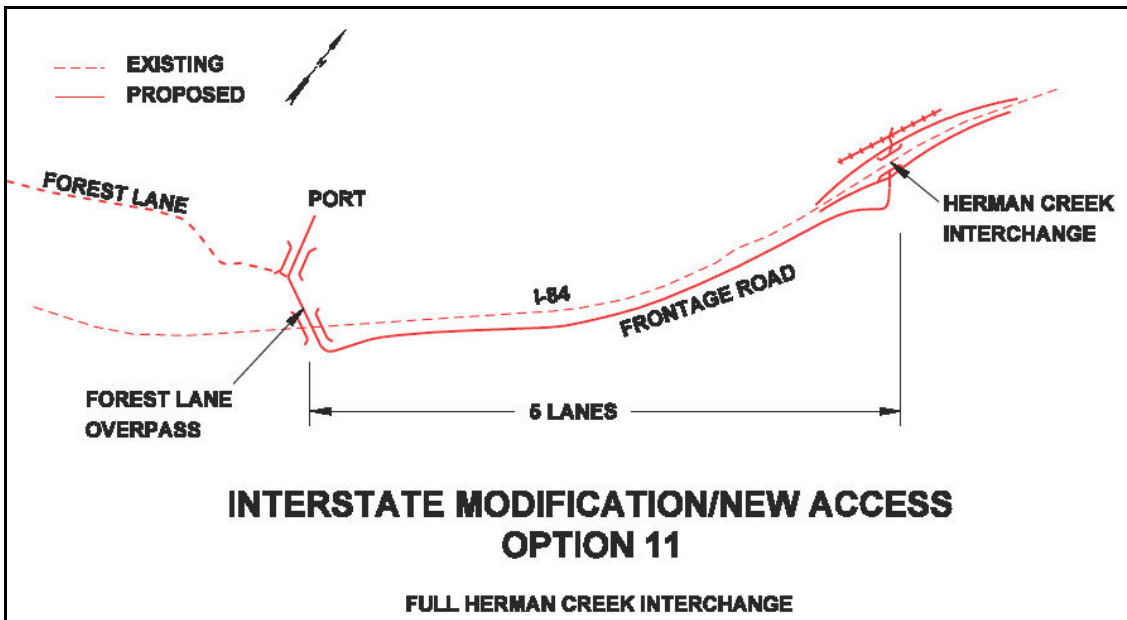


Figure 4: Full Complete Herman Creek Interchange (Alternative 11)

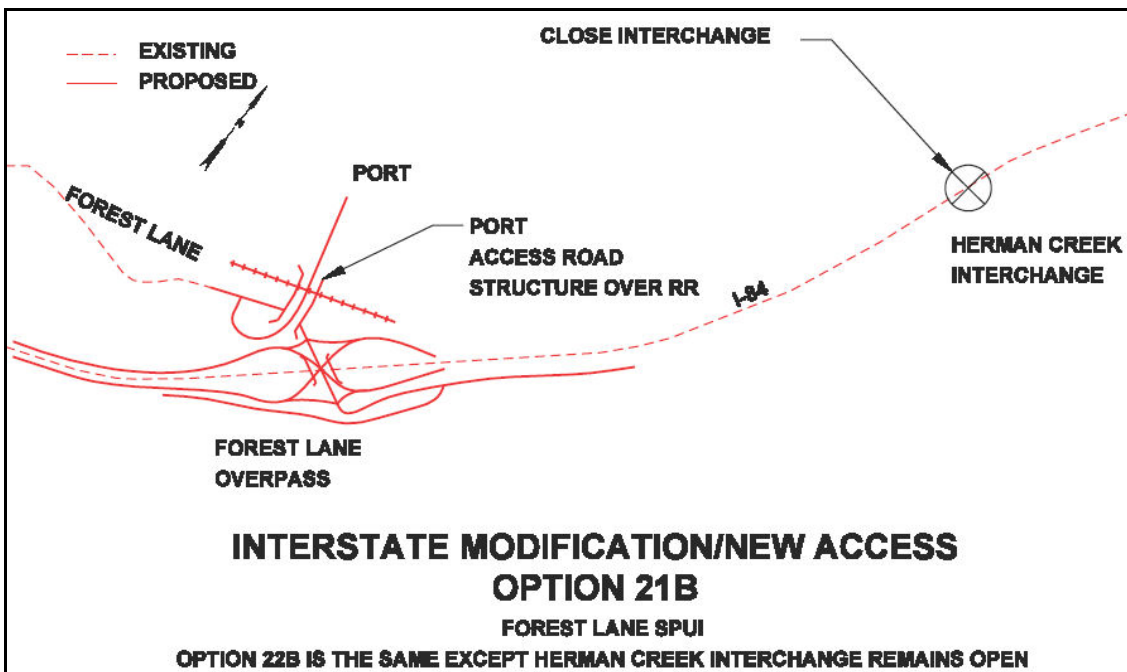
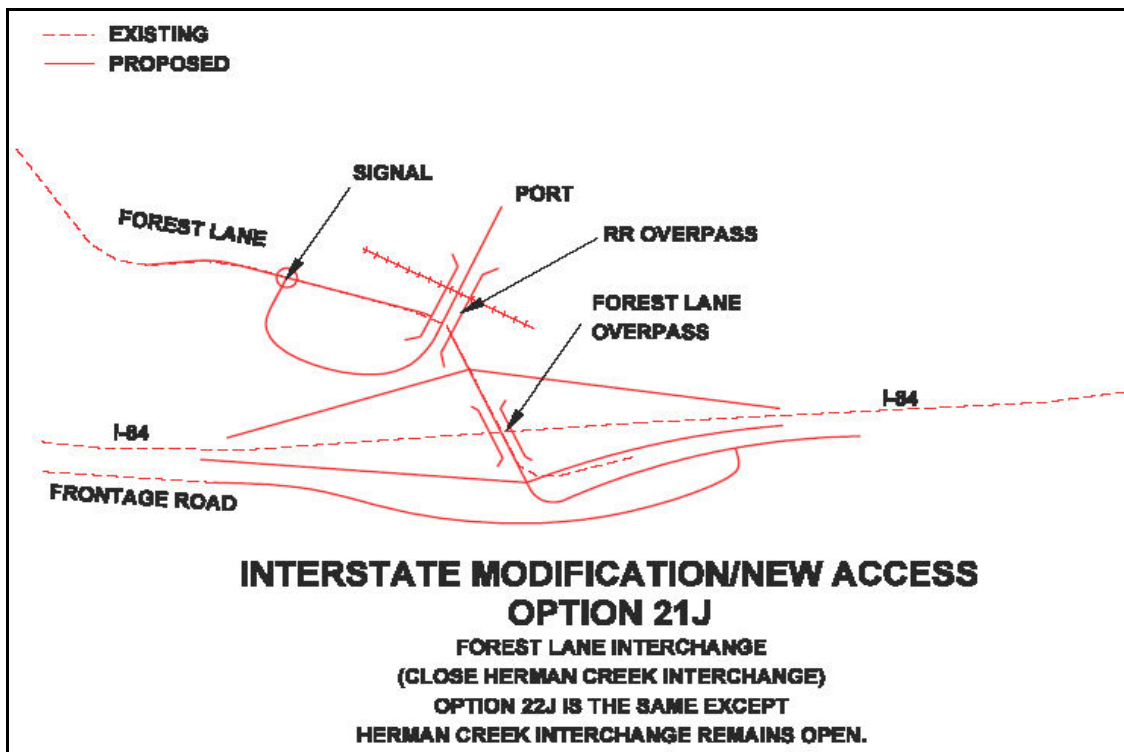


Figure 5: Single Point Urban Interchange at Forest Lane (Alternative 21B)



**Figure 6: Diamond Interchange at Forest Lane (Alternative 21J)**

The remaining interchange alternatives were then evaluated in terms of traffic operations and design criteria, to comply with Policy Points 1, 3 and 4. Each of the five alternatives would require additional local roadway improvements to provide acceptable mobility (the ability for traffic to move on the roadway system). The examination of future traffic on the existing roadway system under the “pure” local option (L2) demonstrates the need for access modification; that is, without access modification, WaNaPa Street would need to be widened to four travel lanes, which is inconsistent with the Cascade Locks TSP.

The interstate access modification alternatives (L3/13, 11, 21B, and 21J), require local improvements unrelated to the access alternative; these improvements would be required based on the expected growth in traffic volumes. These improvements are primarily at the ends of the Bridge of the Gods where both intersections fail the applicable mobility standard.

Based on the traffic operations analysis, there would be little differentiation between the interstate access modification alternatives. Alternatives L3/13 (Full East Cascade Locks Interchange) and 11 (Full Herman Creek Interchange), while capable of meeting the mobility standards on the local street system with improvements, would be likely to have substantial adverse impacts related to implementation. For example, it may be difficult to maintain weigh station/port of entry operations with completion of the East Cascade Locks Interchange. In addition, the Full East Cascade Locks Interchange would not provide direct access to the Port of Cascade Locks Industrial Park, which is the site of the Tribe’s proposed development. Completing the Herman Creek Interchange may not be possible given the close proximity of the interchange to the UPRR. Further, since the majority of traffic to the Port’s Industrial Park is to and from the west, traffic would be drawn past the industrial park to exit I-84 to reach the industrial park via Frontage Road (this is called “out-of-direction” travel). The Herman Creek Interchange would also be

located outside of the urban area of Cascade Locks and improvements would be primarily to serve urban area traffic demands, contrary to Oregon State land use policy.

Alternative 21B with the higher capacity SPUI, was analyzed to provide high-capacity interchange concept, in case the diamond interchange concept could not handle the expected traffic volumes. Since the traffic analysis indicated acceptable mobility with the diamond interchange concept, Alternative 21B was eliminated from further consideration.

## **Consideration of ODOT Spacing Standards**

There are two sets of ODOT spacing standards that apply to interchanges and interchange areas:

- The Oregon Highway Plan's (OHP) interchange spacing standard in urban areas is a three-mile spacing measured between the crossroads of the interchanges. In rural areas that standard is six miles.<sup>3</sup>
- Oregon Administrative Rule (OAR) Division 51 standards specify that intersections should not be closer than 1,320 feet (1/4 mile) to interchange ramps.

The existing interchanges in Cascade Locks are spaced at less than the ODOT OHP standard (see Figure 7):

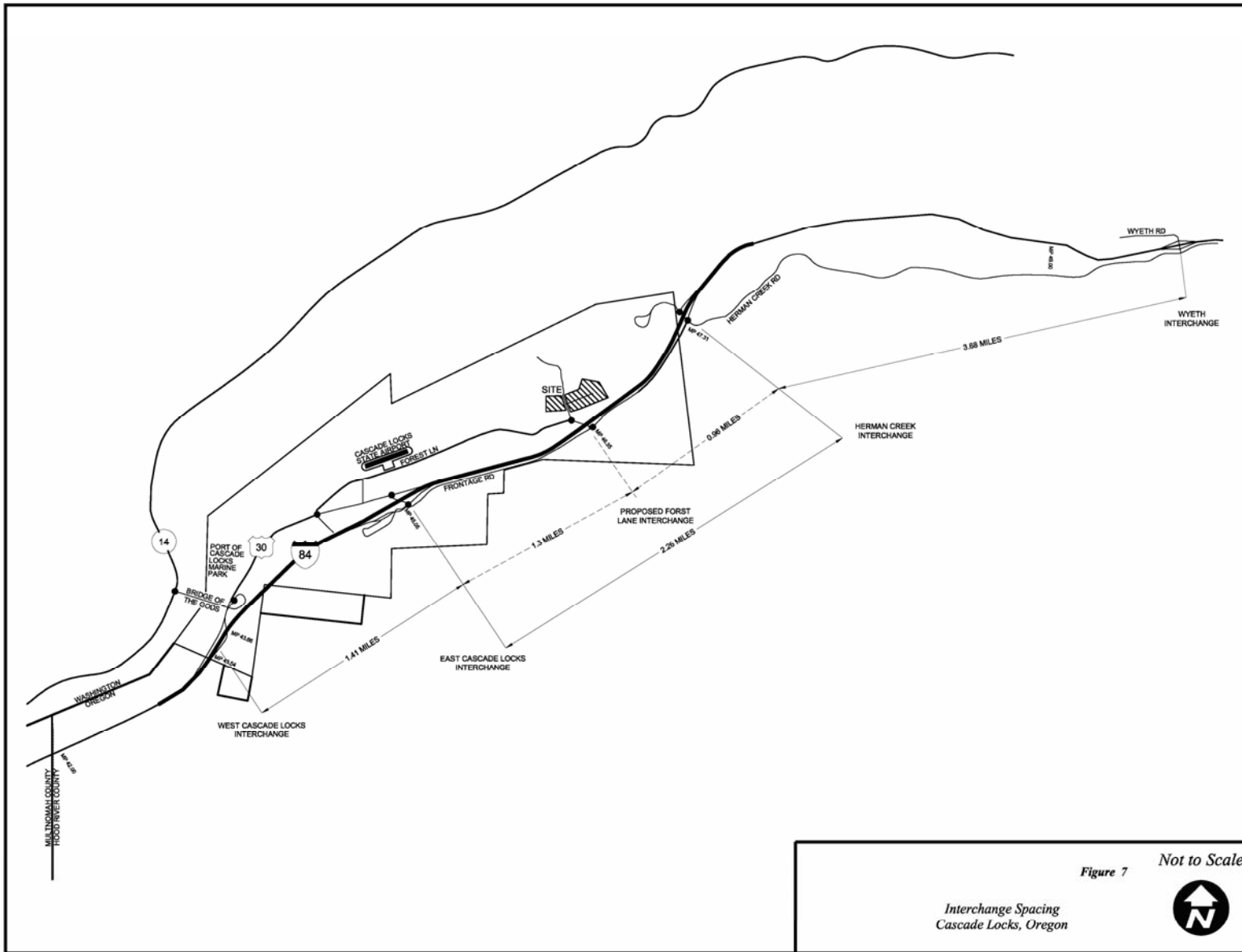
- Spacing between West Cascade Locks and East Cascade Locks interchanges is 1.41 miles.
- Spacing between East Cascade Locks and the Herman Creek interchanges is 2.26 miles
- Spacing between Herman Creek and Wyeth interchanges (the next interchange to the east) is 3.68 miles.

An interchange at Forest Lane would result in interchange spacing less than the standard (1.3 miles from East Cascade Locks Interchange and 0.96 miles from the Herman Creek Interchange). The resulting spacing would require a higher level of deviation from the ODOT three-mile urban spacing standard than the existing interchanges.

To address the interchange spacing issue, the AWG studied a modification to Alternative 21J, identified as Alternative 20J, in which both the Herman Creek Interchange and the East Cascade Locks Interchange would be closed. With the proposed closures, Alternative 20J would be spaced 2.71 miles from the West Cascade Locks Interchange and 4.64 miles from the Wyeth Interchange. Even with Alternative 20J, a deviation from the OHP interchange spacing standard would still be required; however, it more closely meets the standards than the existing conditions or the other access alternatives (See Figure 7).

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<sup>3</sup> Although the City of Cascade Locks is designated an "urban area", the Wyeth interchange lies outside the urban area, and so the rural six-mile spacing standard applies.



**Figure 7: Interchange Spacing – Cascade Locks**

Based on Alternative 20J, which would consolidate the East Cascade Locks and Herman Creek interchanges at a single new interchange, the Forest Lane Interchange concept was refined to address Division 51 crossroad intersection spacing standards. Nine options were generated by the AWG; two of these options proposed moving the connection of Forest Lane and Frontage Road to the east of the proposed interchange (Options 1E and 2E) while the other seven proposed moving the connection to the west (Options 1W, 2W, 3W, 3Wa, 4W, 5W and 6W). Refinement and narrowing of the options led to development of a refined option (Comp1). The refined option (Comp1) demonstrated that the 1,320-foot intersection spacing could be met with the Forest Lane/Frontage Road intersection moved to the west of the interchange. An option for moving the Forest Lane/Frontage Road intersection to the east (Option 2E) was retained in case the provision of access to existing land uses was in conflict with Comp1. ODOT reviewed the options and communicated to BIA in April 2007 that the Comp1 and 2E options could be considered operationally acceptable. However, additional refinement will be required to achieve an acceptable interchange design.

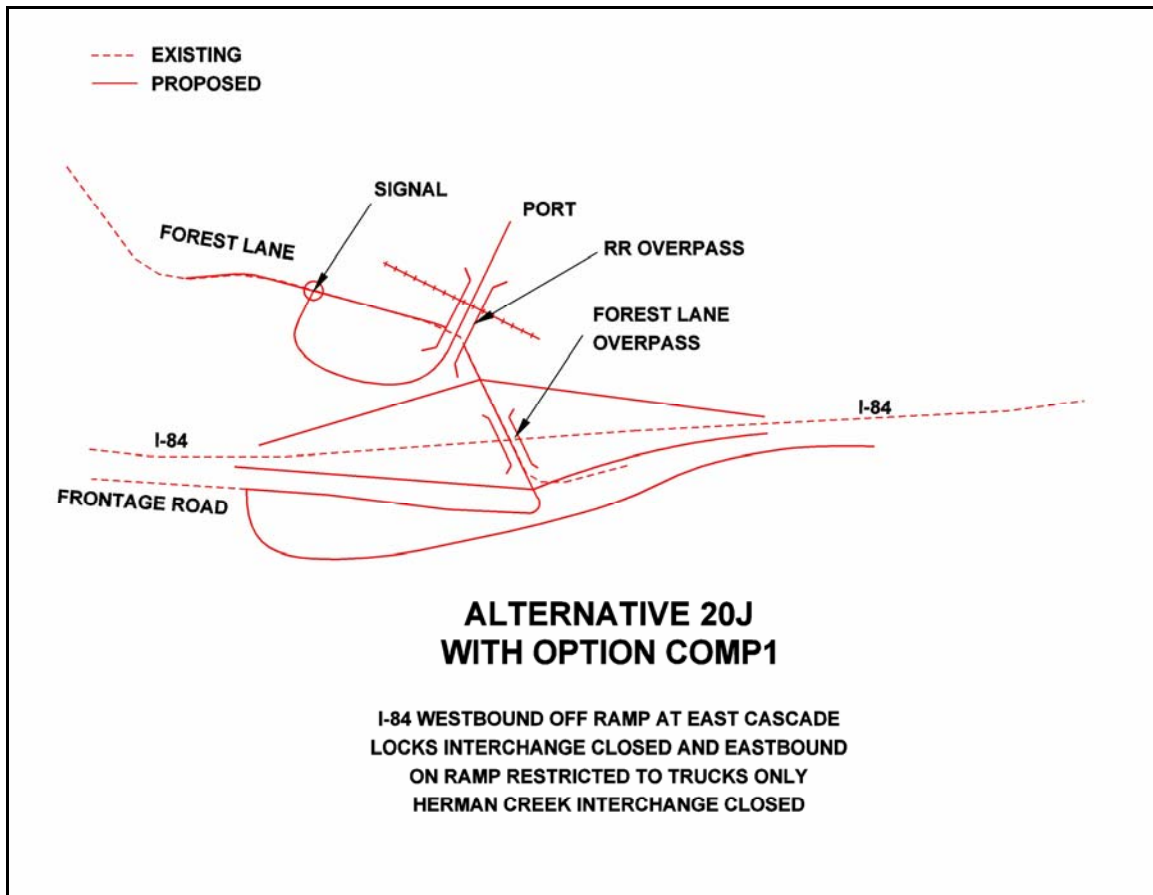
### **Operationally Acceptable Alternative**

Based on ODOT's input and FHWA's acknowledgement of its acceptability, and with input from the AWG, Alternative 20J was identified as the OAA for the APDR. Alternative 20J, the OAA, includes the following elements:

- A new diamond interchange at Forest Lane.
- Closure of the Herman Creek Interchange.
- Closure of the westbound off ramp at the East Cascade Locks Interchange.
- Restriction of the eastbound on ramp at the East Cascade Locks Interchange to trucks exiting the weigh station.
- Improvements to I-84, including a new auxiliary lane eastbound between the existing East Cascades Locks and new Forest Lane interchanges.
- Local roadway improvements.

In the development of Alternative 20J, ODOT expressed concern regarding the interaction between trucks exiting the weigh station to enter I-84 eastbound (i.e., East Cascade Locks Interchange eastbound on-ramp) and vehicles seeking to exit I-84 eastbound at the new Forest Lane Interchange (i.e., Forest Lane Interchange eastbound off-ramp). An analysis of the interaction between those vehicle streams at the peak period for truck departures from the weigh station indicated that, to maintain acceptable mobility, an auxiliary lane between the eastbound entrance (from the weigh station) and exit (to Forest Lane) would be necessary. Figure 8 illustrates Alternative 20J.

The OAA represents the access modification that has been incorporated into the Proposed Action documented in the Draft EIS.



**Figure 8: Alternative 20J – APDR Operationally Acceptable Alternative**

## **APDR Process – Next Steps**

The APDR process does not stop with the identification of the OAA. This section describes the process that typically follows determination of the OAA:

1. Concurrent with the issuance of the Draft EIS, if the Draft APDR is accepted by ODOT and FHWA, the current OAA receives “provisional acceptance.”
2. Because the OAA is part of the Proposed Action in the Draft EIS, the public can comment on the OAA during the public comment period for the Draft EIS.
3. Depending on the nature of the public comments on both the OAA and the Proposed Action, a Final EIS may be issued and a decision made on the Proposed Action. The OAA and Proposed Action may be modified based on public comments.
4. If a Record of Decision (ROD) is issued, FHWA may accept and approve the OAA. At that point, the APDR is no longer considered draft.

## **Standard ODOT/FHWA Approval Process**

As outlined above, ODOT approval of the OAA in the draft APDR is followed by submittal to FHWA for approval of the new interchange. Whether there are deviations from ODOT standards or not, FHWA will review and make its own determination with respect to provisional approval. Upon issuance of the final environmental decision document, the FHWA provisional approval of the APDR becomes final.

Administrative rules require the Oregon Transportation Commission (OTC) to adopt an Interchange Area Management Plan (IAMP), which includes an access management plan for the interchange, as a transportation facility plan consistent with the provisions of OAR 731-015-0065. There is no formal, separate process to approve projects with deviations from spacing standards. Prior to adoption by the OTC, amendments to local comprehensive plans and transportation system plans and land use and subdivision codes must be approved to ensure the proposed Interchange Area Management Plan is consistent with the local plan and codes (OAR 734-0051-0155).

## **Deviations from Standards**

The OAA was selected because, given the defined access needs and current system configuration, it is the alternative that comes closest to meeting the ODOT interchange spacing standards (three miles in urban areas, six miles in rural areas) and Division 51 standards. However, since the OAA does not meet the interchange standards, deviations from those spacing standards would be required for its implementation (the proposed interchange is only 2.71 miles from the next nearest urban interchange to the west and 4.7 miles to the rural interchange at Wyeth, to the east). In addition, a deviation from Division 51 standards that require a minimum of 1,320 feet from an interchange to the first point of access would be required for the loop road intersection with Forest Lane, north of the proposed interchange.

While the interchange spacing and Division 51 standards have clearly shaped the development of the OAA, deviations from standards can be approved when warranted by environmental, land use, or engineering constraints. ODOT reviews requests for design deviations in consultation with FHWA and based on criteria found in Division 51 of the Oregon Administrative Rules. The overall processes for obtaining approvals for projects, including those with deviations from the relevant standards, are briefly described below.

### ***Requests for Approval of the OAA with Deviations from FHWA/ODOT Interchange Spacing Standards***

The 1999 Oregon Highway Plan (as amended August 23, 2006, page 207) requires approval for deviation from the three-mile urban or six-mile rural spacing standards (crossroad to crossroad) at a new interchange if the standards cannot be met. When a new interchange is proposed and a deviation from the three-mile urban or six-mile rural spacing requirement between interstate interchanges is warranted, ODOT requests approval for the project from FHWA. ODOT and FHWA would collaborate to determine the acceptability of the OAA. In the case of the proposed Forest Lane Interchange, and as part of required and customary consultation, FHWA has informally agreed that the OAA as defined in the Draft EIS would be approved.

### ***Deviations from Division 51 Standards***

The Interchange Area Management Plan (IAMP) is the overall process by which interchange projects are approved—with or without deviations from Division 51 spacing standards. Deviations are defined as “departures from the access management spacing standards” (OAR 734-051-0040 Definitions). There is an objective on the part of ODOT, and an expectation on the part of the OTC, that in the case of new interchanges or major modifications to existing interchanges, every reasonable effort will be made to move toward or achieve Division 51 spacing standards.

Requests for deviation approval must be prepared and submitted by a registered Professional Engineer, and must have the concurrence of the ODOT Region Manager and Region Roadway Manager or Tech Center Manager. Deviations must be approved by the State Roadway Engineer.

An IAMP that incorporates a request for approval of a deviation must include supportive evidence that the proposed access meets one or more of the reasons identified for deviation approval contained in Division 51 and would have to demonstrate that the proposed access would not undermine safety or access to and from the interchange. The applicant is required to evaluate the impacts of the proposed action over a 20-year horizon from the date of application. A traffic impact study is typically required. The traffic impact study for the proposed Forest Lane Interchange has already been completed as part of the Draft EIS and APDR process for the Cascade Locks Resort and Casino Project. However, additional traffic analysis at a refined scale may be necessary to identify impacts of the project at an intersection level, in order to determine whether mitigation measures would be needed and effective.

ODOT may require mitigation measures that include those listed in OAR 734-051-0145. Approval of a deviation from standards can be conditioned on implementation of mitigation measures to address identified deficiencies. The deviation and any required mitigation measures and short-, medium- and long-term actions required to improve the functional integrity of the highway system then become part of an approved IAMP and associated Access Management Plan that is approved by the Region Manager and the OTC.