



Board of Commissioners

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Pendleton, OR 97801
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Daniel N. Dorran
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BOARD OF COMMISSIONERS MEETING

Tuesday, November 26, 2024, 9:00am
Umatilla County Courthouse, Room 130

- A. Call to Order
- B. Chair's Introductory Comments & Opening Statement
- C. New Business

COMPREHENSIVE PLAN MAP AMENDMENT P-137-24, and ZONE MAP AMENDMENT Z-324-24: HAAK HOLDINGS, LLC, APPLICANT & OWNER.

The applicant requests to change the Comprehensive Plan designation from Rural Residential to Commercial and change the Zoning Map from Rural Residential – 4 Acre Minimum Parcel Size (RR-4) to Rural Retail Service Commercial (RRSC). The subject property is located on the west side of State Highway 11, approximately 1.5 miles north of the Milton-Freewater city limits. The situs address is 84722 Highway 11, Milton-Freewater, OR 97862. The site is identified on assessor's map as Township 6 North, Range 35 East, Section 25B, Tax Lot 1900. The subject property is approximately 1.97 acres. The criteria of approval are found in Oregon Revised Statute ORS 197.195, Oregon Administrative Rule Chapter 660, Divisions 12 & 15, and Umatilla County Development Code (UCDC) Section 152.750 – 755 and UCDC Section 152.251.

- D. Adjournment

COMMUNITY &
BUSINESS
DEVELOPMENT

LAND USE
PLANNING,
ZONING AND
PERMITTING

CODE
ENFORCEMENT

SOLID WASTE
COMMITTEE

SMOKE
MANAGEMENT

GIS AND MAPPING

RURAL ADDRESSING

LIAISON, NATURAL
RESOURCES &
ENVIRONMENT

PUBLIC TRANSIT

MEMO

TO: Umatilla County Planning Commission
FROM: Robert Waldher, Community Development Director
DATE: November 19, 2024

RE: **November 26, 2024 Board of Commissioners Hearing**
Comprehensive Plan Map Amendment P-137-24
Zoning Map Amendment Z-324-24
Assessor's Map 6N 35 25B, Tax Lot #1900

Request

The applicant/owner, HAAK Holdings, LLC, requests to change the Comprehensive Plan designation from Rural Residential to Commercial and change the Zoning Map from Rural Residential – 4 Acre Minimum Parcel Size (RR-4) to Rural Retail Service Commercial (RRSC). The subject property is located on the west side of State Highway 11, approximately 1.5 miles north of the Milton-Freewater city limits. The situs address is 84722 Highway 11, Milton-Freewater, OR 97862. The site is identified on assessor's map as Township 6 North, Range 35 East, Section 25B, Tax Lot 1900. The subject property is approximately 1.97 acres. A vicinity map of the subject property is attached as **Exhibit A**. A map showing the existing and proposed zoning of the subject property is attached as **Exhibit B**.

Background Information

Umatilla County records show that the applicant/owner purchased the subject property in February, 2022. Umatilla County Code Enforcement issued a 30-day warning to the owners of the subject property on June 15, 2022. The warning was for the unpermitted operation of a business in the RR-4 zone. Subsequent to the warning, planning staff made contact with the property owners to discuss property rezoning to correct the violation. A second warning was issued to the owners of the subject property on July 12, 2023 due to continued operation of the business without land use approval. Planning staff again made contact with the property owners to prompt them to prepare a plan amendment to correct the violation. The subject property continues to be used by the applicant (in violation of the Umatilla County Development Code) to store RV's, trailers and campers in support of the applicant's business operations, Click-it RV.

An application for a Comprehensive Plan Map Amendment and Zoning Map Amendment was submitted to Umatilla County Community Development Department on June 12, 2024. Staff has prepared Findings (see attached). In accordance with requirements of the Umatilla County Development Code and Oregon Transportation Planning Rule, the applicant has also submitted a Traffic Impact Analysis which is attached as **Exhibit C**.

Criteria of Approval

The criteria of approval are found in Oregon Revised Statute ORS 197.195, Oregon Administrative Rule Chapter 660, Divisions 12 & 15, and Umatilla County Development Code (UCDC) Section 152.750 – 755 and UCDC Section 152.251.

Memo

BCC Public Hearing – November 26, 2024

Land Division Request LD-5N-912-24

Notice

A 35-day Plan Amendment Notice was provided to the Department of Land Conservation and Development (DLCD) on September 19, 2024. Notice of the public hearings was mailed on October 4, 2024 to the owners of properties located within 250-feet of the perimeter of Tax Lot 1900. Notice was also published in the East Oregonian on October 12, 2024 notifying the public of the applicant’s request before the Planning Commission on October 24, 2024 and the Board of Commissioners on November 26, 2024.

Hearings

The first evidentiary hearing was held before the Umatilla County Planning Commission on October 24, 2024 at 6:30 PM. During the hearing, the Planning Commission voted 8-0 to recommended approval of the amendment by the Board of Commissioners. The second evidentiary hearing is scheduled before the Umatilla County Board of Commissioners on November 26, 2024 at 9:00 AM.

Conclusion

The Board of Commissioners are tasked with making a final decision whether or not to approve or deny the proposed Comprehensive Plan Map Amendment and Zoning Map Amendment.

Staff have provided sample motions for the Board of Commissioners consideration below:

BOARD OF COMMISSIONER MOTION OPTIONS

A. Motion to Approve Based on Evidence in the Record

I, Commissioner _____, make a motion to approve Plan Map Amendment P-137-24 and Zoning Map Amendment Z-324-24, based on the foregoing Findings of Fact and Conclusions of Law.

B. Motion to Approve with Additional Findings

I, Commissioner _____, make a motion to recommend approval of Plan Map Amendment P-137-24 and Zoning Map Amendment Z-324-24, with the following additional Findings of Fact: _____.

C. Motion to Deny Based on Evidence in the Record

I, Commissioner _____, make a motion to deny Plan Map Amendment P-137-24 and Zoning Map Amendment Z-324-24, based on the foregoing Findings of Fact and Conclusions of Law.

Attachments

- Final Findings and Conclusions
- Exhibit A – Vicinity Map
- Exhibit B – Proposed Rezone Map
- Exhibit C – Traffic Impact Analysis

**UMATILLA COUNTY BOARD OF COMMISSIONERS
FINDINGS AND CONCLUSIONS
COMPREHENSIVE PLAN MAP AMENDMENT P-137-24
ZONING MAP AMENDMENT Z-324-24
ASSESSOR'S MAP 6N 35 25B, TAX LOT 1900**

- 1. APPLICANT:** HAAK Holdings, LLC, 3203 W Marie Street, Pasco, WA 99301
- 2. OWNER:** HAAK Holdings, LLC, 3203 W Marie Street, Pasco, WA 99301
- 3. LOCATION:** The subject property is located on the west side of State Highway 11, approximately 1.5 miles north of the Milton-Freewater city limits. The situs address is 84722 Highway 11, Milton-Freewater, OR 97862. *See attached Vicinity Map, Exhibit A.*
- 4. ACREAGE:** Tax Lot 1900 is 1.97 acres.
- 5. COMPREHENSIVE PLAN DESIGNATION:** Rural Residential
- 6. ZONING:** Rural Residential, 4 Acre Minimum Parcel Size (RR-4)
- 7. ACCESS:** The subject property has direct access to/from Highway 11.
- 8. ROAD TYPE:** State Highway 11, abutting the east property line of the subject property, is a multi-lane paved intrastate highway maintained by the Oregon Department of Transportation.
- 9. EASEMENTS:** Access and utility easements are located on the subject property.
- 10. UTILITIES:** Electricity and phone service currently serves the subject property.
- 11. WATER/SEWER:** The subject property is located outside of the city limits of the City of Milton-Freewater. Therefore, no municipal water or sewer services are available. There is an existing well and on-site sewage disposal system on the subject property.
- 12. IRRIGATION:** The subject property is within the Hudson Bay / Walla Walla River Irrigation District.
- 13. FIRE PROTECTION:** Fire protection could be provided to the subject property through Milton-Freewater Rural Fire Protection (subscriber service).
- 14. WETLANDS:** The subject property does not contain any National Wetland Inventory mapped wetlands.
- 15. FLOODPLAIN:** The subject property is not within a Federal Emergency Management Agency regulatory floodplain.

- 16. EXISTING LAND USE:** Land use on the subject property has historically been for rural residential uses. A mobile home was permitted on the property in 1995. In addition to the mobile home, the subject property is currently being used by the applicant (in violation of the Umatilla County Development Code) to store RV's, trailers and campers in support of the applicant's business operations, Click-it RV.
- 17. SURROUNDING LAND USE:** The subject property is located adjacent to a variety of different land uses. Immediate to the west are developed rural residential lots of various size, and several additional lots zoned Exclusive Farm Use (EFU). To the north of the subject property is a significant cluster of RRSC-zoned development located on both sides of Highway 11 (the Ferndale/Crockett Road commercial node), as well as the Villadom Mobile Home and RV Park. Across Highway 11 to the east are two EFU parcels and another parcel zoned RRSC. To the south are lots zoned RR-4 and EFU. A majority of the non-EFU parcels surrounding the subject property have been developed with non-farm uses.
- 18. DLCD 35-DAY NOTICE:** Notice of the proposal was posted to DLCD's Plan Amendment site on September 19th, 2024.
- 19. PUBLIC NOTICE:** Public notice was provided to surrounding properties within 250 feet of the subject property, and applicable agencies, on October 4, 2024.
- 20. AGENCIES NOTIFIED:** Umatilla County Assessor, Umatilla County Counsel, Umatilla County Public Works, Oregon Department of Transportation, Milton-Freewater Rural Fire, DLCD, City of Milton-Freewater, CTUIR (Cultural Resources Protection Program)
- 21. PC HEARING:** The first evidentiary hearing was held before the Umatilla County Planning Commission on October 24, 2024 at 6:30 PM. During the hearing, the Planning Commission voted 8-0 to recommended approval of the amendment by the Board of Commissioners.
- 22. BCC HEARING:** The second evidentiary hearing is scheduled before the Umatilla County Board of Commissioners on November 26, 2024 at 9:00 AM.
- 23. REQUESTS:**
1. The applicant requests approval to change the Comprehensive Plan designation from Rural Residential to Commercial (Plan Map Amendment P-137-24). *See attached, Exhibit B.*
 2. The applicant requests approval to change the Zoning Map from RR-4 to Rural Retail Service Commercial (RRSC) (Zoning Map Amendment Z-324-24). *See attached, Exhibit B.*

The approval of this request, to change the zoning on the subject property, would allow the property to be developed to the uses permitted by the Umatilla County Development Code (UCDC) for the RRSC zone. In the event these amendments are approved and the RRSC zone applied to the subject property, the applicant has expressed an intent to develop the property as a recreational vehicle (RV) sales lot (Click-It RV) through a separate land use approval process.

Under UCDC Section 152.253(J), an RV sales lot is considered an “other use similar to the uses permitted or the conditional uses normally located in a RRSC zone, provided that the use has the approval of the Planning Director or Planning Commission.” Since the purpose of this request is to change the zoning to allow a proposed use, the applicant will subsequently need seek approval of a conditional use permit to allow the use of the property as an RV sales lot.

24. APPLICABLE STANDARDS AND CRITERIA:

- Umatilla County Development Code (“UCDC”)
 - Chapter 152: Development Code
 - Sections 152.750- .755, Amendments
 - Section 152.251, Purpose of RRSC Zone
- Umatilla County Comprehensive Plan (“UCCP”)
 - Chapter 11. Recreational Needs
- Finding 12
 - Chapter 12. Economy of the County
- Policy 12
- Finding 12
 - Chapter 18. The Plan Map
 - Retail/Service Commercial
 - East County Commercial
- Oregon Administrative Rules (“OAR”) Chapter 660, Land Conservation and Development Commission
 - Division 12, Transportation Planning
 - OAR 660-012-0060, Plan and Land Use Regulation Amendments
 - Division 15, Statewide Planning Goals and Guidelines
- Oregon Revised Statutes (“ORS”)
 - ORS 197.175, Cities’ and Counties’ Planning Responsibilities

A. UMATILLA COUNTY DEVELOPMENT CODE

UCDC Chapter 152.251 – Purpose

The RRSC, Rural Retail/Service Commercial Zone is designed to comply with Goal 14 and provide areas outside of urban growth boundaries and unincorporated communities where specific commercial activities require larger sites than are available inside an urban growth boundary and provide for retail and service- oriented commercial activities to accommodate rural residences. This zone is applied to commercial lands outside unincorporated communities and urban growth boundaries for which an exception to Goal 14 has not been approved. The intent of the Rural Retail/Service Zone is to permit the continuation and expansion of existing uses and to provide rural employment opportunities for new uses that are generally rural-scale and low impact.

Applicant Response: The Applicant is proposing a continuation and expansion of its existing RV sales and service facility use onto the Subject Property. Additionally, the Subject Property is located outside of an unincorporated community and all urban growth boundaries (“UGBs”), and an exception to Goal 14 has not been approved. Therefore, the rezoning of the Subject Property is consistent with the Applicant’s proposed use of the Subject Property, and the intent and purpose of the RRSC zone. This criterion is met.

County Finding: Umatilla County finds that the applicant proposes to rezone the subject property to RRSC from RR-4. Under the proposal, the subject property would maintain its “rural” comprehensive plan designation for lands outside unincorporated communities and urban growth boundaries for which an exception to Goal 14 (Urbanization) has not been approved. Umatilla County finds and concludes that the proposed rezone of the subject property and the applicant’s proposed use of the subject property meets the purpose of RRSC zone. This criterion is met.

UCDC Chapter 152.750-.755 – Amendments

Section 152.750, Authorization to Initiate Amendments:

(A) An amendment to the text of this chapter or to a zoning map may be initiated by the County Board of Commissioners, the County Planning Commission, or by application of a property owner. The request by a property owner for an amendment shall be accomplished by filing an application with the Planning Director, using forms prescribed pursuant to § 152.767.

Applicant Response: The Applicant is the owner of the Subject Property and submits the subject Application to rezone the Subject Property from RR-4 to RRSC and revise the Property’s UCCP designation from Rural Residential to Commercial.

County Finding: Umatilla County finds that the application for an amendment was submitted to the Community Development Department on June 12, 2024, and the application was deemed complete July 25, 2024. Umatilla County finds and concludes that the filed application included the completed forms prescribed by the county. This criterion is met.

Section 152.751, Compliance with Comprehensive Plan:

An amendment to the text of this chapter or to a zoning map shall comply with the provisions of the County Comprehensive Plan Text and Comprehensive Land Use Map. Proposed amendments shall also comply with the applicable provisions of the Oregon Transportation Planning Rule, Oregon Administrative Rule (OAR) 660, Division 12 and the Umatilla County Transportation Plan, and are subject to the requirements of § 152.019, Traffic Impact Analysis. Any deviation from this section shall be preceded by an amendment to the Comprehensive Plan Text or to the Comprehensive Land Use Map. However, if the existing use of the property is allowed outright in the requested zone, compliance with the Comprehensive Plan is not necessary.

Applicant Response: As is described below, the Application is consistent with relevant provisions of the UCCP, Oregon Transportation Planning Rule (“TPR”), Oregon Administrative Rule (“OAR”) 660, Division 12 and the Umatilla County Transportation Plan. The Applicant has also submitted a Traffic Impact Analysis (“TIA”) prepared by Clemow & Associates that addresses the criteria within the TPR (OAR 660-012-0060), UCDC Section 152.751 – Compliance with Comprehensive Plan, UCDC Section 152.019, and the Oregon Highway Plan criteria. *See attached, Exhibit C.*

County Finding: Umatilla County finds and concludes that the applicant has addressed the relevant

provisions of the UCCP, Oregon TPR, and OAR; and the applicant submitted a TIA that has been included in the project record. This criterion is met.

Section 152.752, Public Hearings on Amendments:

The Planning Commission shall conduct a public hearing on the proposed amendment according to the procedures of § 152.771 of this chapter at its earliest practicable meeting after it is proposed. The decision of the Planning Commission shall be final unless appealed, except in the case where the amendment is to the text of this chapter, then the Planning Commission shall forward its recommendation to the Board of Commissioners for final action. The Board shall hold a public hearing in accordance with § 152.771 of this chapter within 60 days from receipt of the Planning Commission's recommendation. Appeal shall be to the County Board of Commissioners who shall hold a public hearing on any appeal, pursuant to § 152.771. Appeal shall be heard on a de novo basis.

Applicant Response: Consistent with the above provision of the UCDC, this Application is subject to the public hearing procedures within UCDC 15.771 and must go before the County Planning Commission, who shall forward its recommendation to the Umatilla County Board of Commissioners for final action.

County Finding: Umatilla County finds and concludes that public hearings have been scheduled before the Planning Commission and Board of Commissioners in accordance with the provisions of this section. This criterion is met.

Section 152.754, Record of Amendments:

The Office of County Records shall maintain records of amendments to the text and zoning map of this chapter.

Applicant Response: Should the subject Application be approved, the Office of County Records shall maintain the record of the requested amendment to the zoning map and Plan.

County Finding: Umatilla County finds and concludes that the Comprehensive Plan Amendment and Zoning Map Amendment, should they be approved, will be memorialized through the adoption of an ordinance by the Board of Commissioners and recorded in County Records. This criterion is pending.

B. UMATILLA COMPREHENSIVE PLAN

Chapter 11. Recreational Needs.

Finding 12. Recreational Vehicle Parks are a valuable economic development, tourism and recreational attribute to the County.

Applicant Response: The approval of the subject Application will provide for the continuation and expansion of the Applicant's existing RV sales and service facility, which in turn will provide a local source of RVs to the surrounding rural area. The provision of an expanded source of local RVs complies with the subject UCCP Finding, as providing the local rural community with easier access to RVs will further enhance the County's RV parks which are a valuable economic development, tourism and recreational attribute to the County.

County Finding: Umatilla County finds that the applicant intends to continue the expansion of an existing RV sales lot to the subject property. As described in the Recreational Needs chapter of the Comprehensive Plan, RV parks are a valuable economic development, tourism and recreational attribute to the County. Umatilla County finds and concludes that an increase in RV sales will enhance economic development and contribute to the tourism and recreation in the county. Therefore, the proposal is consistent with the Recreational Needs section of the Comprehensive Plan.

Chapter 12. Economy of the County.

Policy 12. Provide for three types of Commercial Service Center to serve nearby rural development; Tourist Commercial to serve the traveling public; Retail/Service Commercial to serve commercial activities which cannot locate within urban growth boundaries.

Finding 12. The County has a variety of commercial needs in the County.

Applicant Response: The approval of this UCCP map amendment and RRSC rezone will serve the Applicant's existing RV sales and service lot (commercial activity) at the Subject Property. The Applicant's RV sales and service lot cannot easily locate within the County's urban growth boundaries due to the size of parcel required for this specific commercial activity. In addition, the proposal will enhance the variety of commercial offerings within the County, especially within the rural area adjacent Highway 11 and immediately south the existing Ferndale/Crockett commercial node.

County Finding: Umatilla County finds that the applicant intends to continue the expansion of an existing RV sales lot to the subject property. Umatilla County finds and concludes that the sale of RVs is considered a commercial type of use that contributes to both the tourism and retail economy and enhances the variety of commercial activities in the county. Therefore, the proposal is consistent with the Economy of the County section of the Comprehensive Plan.

Chapter 18. The Plan Map.

Retail/Service Commercial.

The great majority of commercial facilities are intended to develop within urban and urbanizable lands. However, specific commercial activities require larger sites than may be available within urban growth boundaries and are encouraged to locate in those rural industrial areas that allow commercial uses. Should increased rural needs for rural "retail/service" designations surpass urbanizing and industrial site availabilities, additional rural lands may be classified commercial upon demonstration of (1) Need for that additional site; (2) Non-availability of appropriate sites in urban growth boundaries and rural industrial areas; (3) Adequate services for that commercial activity; and (4) Compatibility with surrounding land uses.

Existing designated "retail/service" areas shall provide adequate off-street parking areas and be designed so that ingress and egress do not hinder traffic on existing streets. Landscaping shall also be provided on new businesses or expansion of existing businesses, to provide for an aesthetically pleasing setting. Lands classified as retail/service commercial in the east county area occur as nodes along Highway 11

north of Milton-Freewater. Many small businesses, several vehicle sales facilities, a large shopping center, and scattered industrial firms have been developed, which have created a strip of commercial development. In 1979 a citizens committee recommended to the County Board of Commissioners a consolidation of the existing development; hence, the present six nodules of commercial.

New business in the east county area shall be limited to these six commercial nodes along highway and should be small-scale (under 4,500 sq. ft. in the floor area) and oriented to the rural market in the area. Larger facilities may be allowed conditionally if the four criteria listed in the first paragraph of this section can be met. Additional large-scale development such as the shopping center shall not be permitted.

Applicant Response: Additional rural "retail/service" lands may be classified commercial upon demonstration of (1) Need for that additional site; (2) Non-availability of appropriate sites in urban growth boundaries and rural industrial areas; (3) Adequate services for that commercial activity; and (4) Compatibility with surrounding land uses. As is demonstrated below, these criteria are met and the Subject Property is suitable to be classified as commercial. These criteria are addressed in turn.

(1) Need for that additional site;

The Applicant's proposal to re-classify the Subject Property commercial is in furtherance of the Applicant's request to rezone the Subject Property RRSC in order to continue and expand its existing RV sales and service facility use at the Property. To the north, the Subject Property is adjacent the parcel where the Applicant is operating its existing RV sales and service facility. That parcel is designated commercial and zoned RRSC, and is located within the Ferndale/Crockett commercial node. The Subject Property has limited residential development potential and is perfectly situated to be designated commercial, as the Property is adjacent existing commercial lands, the Ferndale/Crockett commercial node, and Highway 11. This criterion is met.

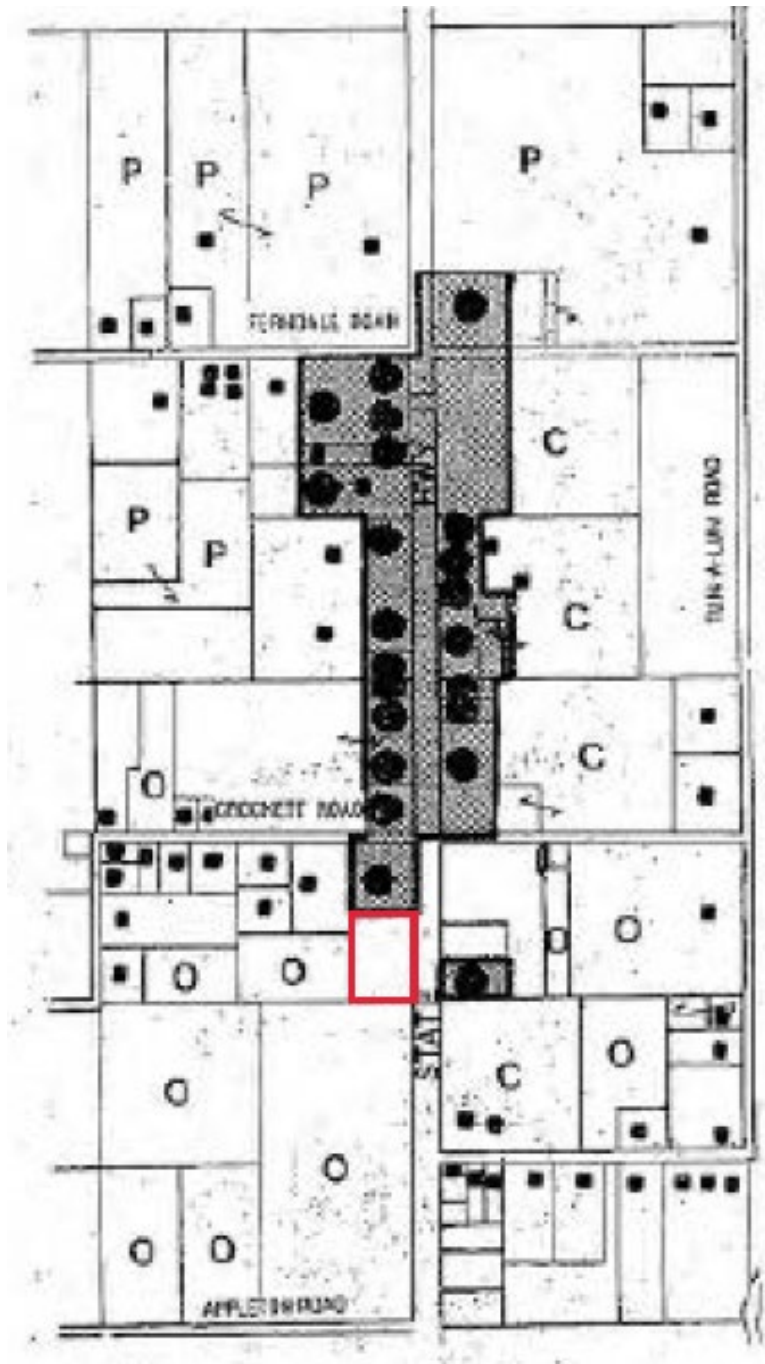


Figure 1. Close-Up of Ferndale/Crockett Commercial Node. UCCP Map 18-69.

(2) Non-availability of appropriate sites in urban growth boundaries and rural industrial areas;

The purpose of this UCCP map amendment and zone change application is to allow the Applicant to expand its existing RV sales and service facility onto the Subject Property. The Applicant's existing RV sales and service facilities are located within the Ferndale/Crockett commercial node and are in close proximity to the Subject Property. The Applicant's existing RV sales and service facilities are located within the Ferndale/Crockett commercial node and are in close proximity to the Subject Property. As such, the Subject Property is perfectly situated to be included within the Ferndale/Crockett commercial node and is adjacent the Applicant's existing Click It RV business.

The Applicant has conducted a detailed parcel-by-parcel analysis of East County commercial land to determine the availability of viable commercial sites available in other commercial nodes along Highway 11, as well as within the Milton-Freewater Urban Growth Boundary (“UGB”). The Applicant has concluded that there are no other viable commercial sites within either the existing Highway 11 commercial nodes or the Milton-Freewater UGB. Therefore, there is a need for the proposed map amendment and rezone of the Subject Property due to the non-availability of other viable commercial land within the East County subarea and this criterion is met.

Specifically, the Applicant’s analysis of East County commercial lands established that there are very few vacant commercial parcels within East County, and that none of the vacant/potentially vacant parcels present a viable alternative to the rezoning of the Subject Property. These vacant or potentially vacant parcels are analyzed individually¹ as follows:

Analysis of Potentially Viable Parcels within Existing East County Commercial Nodes

1. *TL 6N3524B000702*: This parcel is partially developed with a conex shipping container along the southern property line, is not controlled by the Applicant or otherwise for sale, and lacks sufficient size for the Applicant to operate its RV sales and service facility. Moreover, this parcel appears to be access-limited (unlike the Subject Property), as there are no existing access drives from the property to Weber Street, and parcel does not abut Highway 11.
2. *TL 6N3524B000700*: This parcel is developed with a grain silo and is not controlled by the Applicant or listed for sale. This parcel also has access and parcel size issues similar to that of TL 6N3524B000702.
3. *TL 6N3524B000709*: This parcel is split by an access driveway for 85332 Highway 11, Milton-Freewater. The northern half of the parcel is developed and appears to be supporting an existing commercial use (Walker’s Furniture & Mattress) at 85332 Highway 11. The southern half of the parcel is undeveloped, but this parcel is not controlled by the Applicant, nor is this parcel listed for sale. In addition, this parcel appears to be supporting an existing commercial use at 85332 Highway 11 that would likely conflict with the Applicant’s proposed RV sale and service use.
4. *TL 6N3513C000900*: This parcel is currently being farmed for some form of nursery stock agribusiness, and is not controlled by the applicant or listed for sale. In addition, although this parcel abuts Highway 11, this parcel does not have sufficient access onto the highway. Moreover, even if access was developed for Highway 11, the parcel does not offer the mobility of access offered by the Subject Property.
5. *TL 6N3513C001000*: This parcel is adjacent to TL 6N3513C000900 to the north. This parcel is not controlled by the Applicant or listed for sale, nor does this parcel have the requisite size or access to support the Applicant’s RV sales and service use.

Analysis of Potentially Viable Parcels within Milton-Freewater UGB

1. *TL 6N3536B000490*: This parcel currently appears to be vacant, but is partially encumbered by the Walla Walla River running through the eastern portion of the lot. Moreover, this parcel is not controlled by the Applicant or listed for sale. In addition, the configuration of this parcel is not conducive to an RV sales or service use, and left-hand turn movements from traveling to the parcel from the north on Highway 11 will be limited to a degree not present at the subject property.

¹ Each vacant or potentially viable commercial parcel is identified by its Umatilla County Map and Tax Lot Number.

2. *TL 6N3536B000491*: Foremost, this parcel lacks access to any public road. In addition, it is not controlled by the Applicant or listed for sale. Finally, this parcel's configuration is also not conducive to an RV sales or service use.

In conclusion, the Applicant's parcel-by-parcel analysis of commercial land within the East County area determined that there is a lack of available commercially-zoned parcels for the Applicant's RV sales and service use, or any use, for that matter. All parcels are currently controlled and not listed for sale, and many parcels have significant access, configuration, or sizing issues. As such, the rezone of the Subject Property is necessary. This criterion is met.

(3) Adequate services for that commercial activity;

As described above, there are adequate services for the proposed RV sales and service facility use. This is further evidenced by the successful operation of the Applicant's existing commercial activity that is occurring on the adjacent parcel to the north of the Subject Property.

(4) Compatibility with surrounding land uses.

The parcel to the north of the Subject Property (TL 6N3525B001902) is currently being used for the Applicant's existing Click-It RV sales and service business. As this Application seeks to rezone the Subject Property to allow the expansion of the Applicant's RV sale and service business, the classification of the Subject Property as commercial is inherently compatible with the use of TL 6N3525B001902.

Parcels to the northwest, west, and south are either undeveloped or in agricultural use. The classification of the Subject Property as commercial is compatible with surrounding land uses on these parcels because the sale and service of RVs is the type of rural-scale and low impact commercial use contemplated by the RRSC zoning district. The use of the Subject Property for a RV sales and service use will not result in any offsite impacts aside from traffic, which the Applicant has analyzed in its TIA prepared by traffic engineer Chris Clemow, P.E. of Clemow & Associates.

Moreover, the Subject Property's location in relation to Highway 11 and the existing Click-It RV use on TL 6N3525B001902 will provide significant advantages in terms of site access that will serve to limit any impact to surrounding land uses. The Applicant proposes to use the combined circulation capabilities of the Subject Property and TL 6N3525B001902 to manage ingress and egress from the site, with the Subject Property providing ingress and egress for southbound traffic on Highway 11, and TL 6N3525B001902 providing access for northbound traffic on Highway 11 through the Crockett-Highway 11 intersection, and access for traffic already traveling on Crockett Road. Combined, the access capabilities of the Subject Property and TL 6N3525B001902 will ensure efficient vehicle circulation for trips entering and exiting the site. This, in turn, will minimize vehicular-related impacts on surrounding uses.

Finally, the designation of the Subject Property as commercial is compatible with surrounding residential and agricultural uses because RV sales and service will not generate adverse offsite impacts on those active farming operations or residential living. Rather, the designation of the Subject Property as commercial will provide a buffer for existing agricultural uses from Highway 11. The Applicant notes that it is more likely that nearby existing agricultural uses will generate offsite impacts such as dust and odor than the RV sales and service use proposed for the Subject Property. The Applicant also notes that once the Subject Property is designated commercial, the Applicant will still need to obtain site plan approval for the use of the Subject Property for its Click-It RV use, wherein the County will apply the review criteria within the UCDC to ensure the Applicant's

proposed use is compatible with surrounding land uses. This criterion is met.

County Finding: Umatilla County finds, as described in the Plan Map chapter of the Comprehensive Plan, some commercial activities require larger sites than may be available within urban growth boundaries and are encouraged to locate in those rural industrial areas that allow commercial uses, such as the RRSC-zoned nodes along Highway 11. The Comprehensive Plan identifies four criteria that should be considered for rural lands to be designated rural “retail/service” when urbanizable and industrial sites are unavailable. County Findings are addressed below for each of the following criteria: (1) Need for that additional site; (2) Non-availability of appropriate sites in urban growth boundaries and rural industrial areas; (3) Adequate services for that commercial activity; and (4) Compatibility with surrounding land uses.

(1) Need for that additional site:

Umatilla County finds that there are six commercial nodes classified as retail/service commercial along Highway 11, north of Milton-Freewater. The subject property is located adjacent to the southwest corner of the Ferndale/Crockett commercial node identified in the Comprehensive Plan. Umatilla County finds the applicant has done an analysis of potentially viable parcels within existing east county commercial nodes along Highway 11. The analysis showed that there are very few vacant commercial properties within east county. In addition, the applicant’s analysis showed that the properties were not suitable because they were not available for sale or had other limiting factors such as access or size. Umatilla County finds there is a need for an additional site because of an apparent lack of viable east county commercial properties. Therefore, the proposal is consistent with the above criteria found in the Plan Map section of the Comprehensive Plan.

(2) Non-availability of appropriate sites in urban growth boundaries and rural industrial areas:

Umatilla County finds that the subject property is located just over one half-mile from the northern edge of the City of Milton-Freewater Urban Growth Boundary (UGB). Umatilla County finds the applicant has done an analysis of potentially viable parcels within the Milton-Freewater UGB. The analysis identified two vacant commercial properties within the Milton-Freewater UGB. Both properties were determined to not be viable due to potential traffic and access issues to/from Highway 11. Umatilla County finds there is a need for an additional site because of an apparent lack of viable properties within the Milton-Freewater UGB. Therefore, the proposal is consistent with the above criteria found in the Plan Map section of the Comprehensive Plan.

Umatilla County finds that three rural light industrial nodes are located adjacent to Highway 11 outside the UGB. However, the applicant’s proposal to rezone the property so it could be utilized for RV sales would not be compatible with the allowed uses of the Rural Light Industrial zone. Therefore, Umatilla County finds that this portion of the criteria found in the Comprehensive Plan is not relevant to the application.

(3) Adequate services for that commercial activity:

Umatilla County finds that the subject property is currently developed with an existing well and on-site sewage disposal system on the subject property. The applicant’s intended use for the subject property will primarily consist of parking RVs for sales, which will not require urban level services, as evidenced by the operation of the applicant’s existing commercial activity occurring on the adjacent parcel to the north. Umatilla County finds that there are adequate services for the commercial activity to occur on the subject property. Therefore, the proposal is consistent with the

above criteria found in the Plan Map section of the Comprehensive Plan.

(4) Compatibility with surrounding land uses.

Umatilla County finds that the subject property is immediately adjacent to the Ferndale/Crockett commercial node. Highway 11 consists of a “patchwork” of various rural Comprehensive Plan designations. Umatilla County finds that should the rezone be approved, the subject property will still retain its “rural” designation, limiting future uses to rural-scale, low-density types of land uses which will continue to be compatible with the surrounding land uses, including agricultural lands adjacent to the subject property, and along the Highway 11 corridor. Therefore, the proposal is consistent with the above criteria found in the Plan Map section of the Comprehensive Plan.

East County Commercial.

EAST COUNTY COMMERCIAL

In the east county, eight nodes of commercial have been identified through the Orchards District planning effort conducted in 1978 and 1979. These areas have been incorporated into the total County Comprehensive Plan and reflect many hours of citizen involvement and some fine tuning done since adoption of the Orchards District Plan. In delineating the areas for commercial development, the following criteria were used to show that the site was not available for resource use and should be designated for commercial use:

1. Parcels or portions of large parcels already developed for commercial use;

2. Parcels or portions of large parcels considered to be committed to non-farm use because of:

a. location along Highway 11 of the Old Walla Walla Highway between existing businesses and within a cluster of commercial use;

b. adjacent to a commercial area at a crossroad;

c. Located between existing commercial uses and commercial areas planned by the City of Milton-Freewater. Consideration was also given to the farm value of land in question, and whether the commercial designation was actually desired by the property owner involved. Six areas along Highway 11 were identified as meeting the above criteria (see Map 18-67).

...

The third area is referred to as Ferndale/Crockett and lies between the intersection of Ferndale Road and Crockett Road along Highway 11(see Map 18-68). This area is along both sides of the highway and consists of 28.96 acres in 19 parcels or parts of parcels, ranging from a low of 0.50 acres and a high of 4.54 acres. The reason for including portions of parcels is that the original Citizens Advisory Committee (CAC) set a policy of limiting commercial development to within 300 ft. of the highway. This has been fine-tuned by the Planning Commission since 1979 to reflect topography, location of businesses, and homesites. Approximately 20.5 acres is developed for commercial use and includes a mobile home sales outlet, floor covering sales outlet, farm machinery sales outlet, woodstove sales outlet, veterinary clinic, restaurant, saw shop, auction barn, antique shop, two gas stations and an RV Sales lot. The remaining acreage is infilling between the existing development along the highway.

Applicant Response: The re-designation of the Subject Property from Residential to Commercial is consistent with the purpose and design of the East County Commercial Area and the Ferndale/Crockett commercial node. *See* UCCP 18-299-300. Foremost, the Subject Property is adjacent parcels already developed for commercial use, including the Applicant’s Click It RV sales and service use occurring on the parcel just north of the Property. Additionally, the Subject Property is committed to non-farm use because of its location adjacent Highway 11 and is located within a cluster of commercial uses and existing businesses – the Ferndale/Crockett commercial node. The Subject Property is also located just south of the crossroad between Highway 11 and West Crockett Road. Finally, the Subject Property is located between existing commercial uses within the Ferndale/Crockett commercial node and commercial areas planned by the City of Milton-Freewater to the south. The designation of the Subject Property as commercial is consistent with the commercial designation criteria within the County’s East County Plan.²

County Finding: Umatilla County finds that the subject property proposed for an expansion of an existing RV sales business is immediately adjacent to the Ferndale/Crockett commercial node within the East County Commercial area designated by the Comprehensive Plan. The property is already considered “exception property” committed to non-farm use because it is currently zoned for rural residential use. If the plan amendment is approved and the property is rezoned, the property will retain its “rural” designation. Umatilla County finds that the proposal will fit within the commercial development pattern of properties along the Highway 11 corridor. Therefore, the proposal is consistent with the East County Commercial section of the Comprehensive Plan.

C. OARs

Division 12, Transportation Planning

OAR 660-012-0060(1), Plan and Land Use Regulation Amendments.

(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

(b) Change standards implementing a functional classification system; or

(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection. If a local government is evaluating a performance standard based on projected levels of motor vehicle traffic, then the results must be based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not

²The designation of the Subject Property as commercial is similarly consistent with the description of the Ferndale/Crockett commercial area within the UCCP and explicitly references an RV sales lot within the UCCP’s description of existing commercial development within the plan area.

limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

Applicant Response: The Transportation Planning Rule is applicable because Applicant is requesting a change to an acknowledged comprehensive plan and land use regulation (the zoning map). Attached as **Exhibit C** is the TIA prepared by traffic engineer Chris Clemow, P.E. of Clemow & Associates. Mr. Clemow addresses the criteria of the TPR within his TIA and concludes that “the TPR criteria outlined in OAR 660-012-0060 are satisfied without the need for additional transportation analysis.” This criterion is met.

County Finding: Umatilla County finds that the applicant has prepared a TIA. The TIA concluded that overall, the Comprehensive Plan amendment and rezone would result in a small increase in traffic and will not significantly affect an existing or planned transportation facility. Therefore, the criteria outlined in OAR 660-012-0060 are satisfied without the need for additional transportation analysis. Umatilla County finds that the proposal is consistent with the applicable Division 12 Transportation Planning Rules.

Division 15, Statewide Planning Goals and Guidelines

OAR 660-015-0000

Applicant Response: The Application complies with the Statewide Planning Goals applicable to Umatilla County, as shown below. No exceptions are being requested. Each of the applicable Statewide Planning Goals is addressed in turn as follows:

County Finding: Umatilla County finds that the proposed Plan Map amendment and rezone is consistent with the applicable Statewide Planning Goals outlined in the subsequent findings.

Goal 1, Citizen Involvement.

Applicant Response: Umatilla County will provide notice of the Application to the public through mailed notice to affected property owners. Notice of the public hearings held regarding this Application follow the code requirements. A minimum of two public hearings will be held to consider the Application.

County Finding: Umatilla County finds that the applicant’s request underwent the public hearing process, with two public hearings, and therefore complies with Statewide Planning Goal 1 (Citizen Involvement).

Goal 2, Land Use Planning.

Applicant Response: Goals, policies and processes related to UCCP map amendments and zone change applications are included in the UCCP and UCDC 152.750. The outcome of the Application will be based on findings of fact and conclusions of law related to the applicable provisions of those

laws as required by Goal 2.

County Finding: Umatilla County finds that through this amendment process, the applicant's request complies with the County's Comprehensive Plan and Development Code and therefore complies with Statewide Planning Goal 2 (Planning).

Goal 3, Agricultural Lands.

Applicant Response: This goal is not applicable because the Subject Property does not contain land zoned agricultural land, nor does it support agricultural uses.

County Finding: Umatilla County finds that Statewide Planning Goal 3 (Agricultural Lands) does not directly apply to the applicant's request.

Goal 4, Forest Lands.

Applicant Response: This goal is not applicable because the Subject Property does not contain land zoned forest land, nor does it support forest uses.

County Finding: Umatilla County finds that Statewide Planning Goal 4 (Forest Lands) does not directly apply to the applicant's request.

Goal 5, Open Spaces, Scenic and Historic Areas and Natural Resources.

Applicant Response: This goal is not applicable because the Subject Property is not located in land zoned open space, the Property is not within any scenic or historical area, and no natural resources have been identified. Moreover, the proposed UCCP map amendment and rezone is not development or a project action, and therefore will not impact any Goal 5 resource.

County Finding: Umatilla County finds the subject property does not contain any identified open spaces, scenic and historic areas or natural resources. Therefore, Goal 5 (Open Spaces, Scenic and Historic Areas and Natural Resources) does not directly apply to the applicant's request.

Goal 6, Air, Water and Land Resources Quality.

Applicant Response: The approval of this Application will not impact the quality of the air, water, or land resources of the County. Any future development of the Subject Property would be subject to local, state, and federal regulations that protect these resources.

County Finding: Umatilla County finds that the proposal to rezone the subject property will not impact the quality of the air, water, or land resources of the county. Any future permitting of the subject property would be subject to local, state, and federal regulations that protect these resources. Therefore, the proposal complies with Statewide Planning Goal 6 (Air, Water, and Land Resources Quality).

Goal 7, Areas Subject to Natural Disasters and Hazards.

Applicant Response: This goal is not applicable because the Subject Property is not located in an area that is recognized by the UCCP as a known natural disaster or hazard area.

County Finding: Umatilla County finds that Statewide Planning Goal 7 (Areas Subject to Natural Disasters and Hazards) does not directly apply to the applicant's request.

Goal 8, Recreational Needs.

Applicant Response: The approval of this UCCP map amendment and rezone will satisfy the recreational needs of citizens of the County, State, and visitors as it will allow the continuation and

expansion of the Applicant’s existing RV sales and service facility onto the subject property. If the subject Application is approved, the Applicant’s existing Click It RV business will continue to meet local and regional recreational needs by providing recreational vehicles to support and enhance County, State, and visitors’ recreational activities.

County Finding: Umatilla County finds that approval of the request will allow the applicant to pursue an expansion of an RV sales and service business to the subject property. RVs are a form of recreation and the sale and repair of RVs will enhance recreation activities in the County. Therefore, the proposal is consistent with Statewide Planning Goal 8 (Recreational Needs).

Goal 9, Economic Development.

Applicant Response: Goal 9 is “[t]o provide adequate opportunities throughout the state for a variety of economic activities.” The proposed UCCP map amendment and zone change is consistent with this goal because it provides opportunities for economic development in the County in general, and in the Ferndale/Crockett commercial area in particular, by allowing the currently undeveloped and unused property be put to a more productive use through the continuation and expansion of the Applicant’s existing RV sales and service facility use.

County Finding: Umatilla County finds that the applicant’s proposal to expand a retail and service commercial use (RV sales and service) to the subject property will enhance economic development activities occurring in the Ferndale/Crockett commercial node located along Highway 11 in Umatilla County. Therefore, the proposal is consistent with Statewide Planning Goal 9 (Economic Development).

Goal 10, Housing.

Applicant Response: The re-classification of the Subject Property from residential to commercial will have a negligible impact on housing within the County. Currently, the 1.97-acre Subject Property is substandard for its current RR-4 zoning, which requires a four-acre minimum. At best, the Subject Property could continue to support the existing single-family dwelling (mobile home) at the Property, although the Property’s location adjacent Highway 11 and existing commercial land uses to the north makes future residential development of the Property unlikely. Moreover, the mobile home is currently unoccupied, and presently, the Applicant does not have plans for the residential use of the mobile home. In the event the subject Application is approved, the Applicant and County Staff have discussed addressing the future use of the mobile home during the development permitting phase.

Due to the Subject Property’s limited residential development potential, the re-classification of the Subject Property from residential to commercial will have a de minimis impact on the County’s housing and buildable lands inventory. The subject Application complies with Goal 10.

County Finding: Umatilla County finds that the subject property is developed with one single family dwelling and the property could not be further divided to support additional residential development. Rezoning the property to a commercial zone will have a negligible effect to the county’s inventory of rural residential lands. Therefore, the proposal is compliant with Statewide Planning Goal 10 (Housing).

Goal 11, Public Facilities and Services.

Applicant Response: The approval of this Application will have no adverse impact on the provision of public facilities and services to the Subject Property. Needed services – including fire, police, water, utilities, and county services – are already available in the area. The Subject Property already

has water and sewer utilities, therefore, this request does not require the extension of public facilities and services that would implicate Goal 11.

County Finding: Umatilla County finds that the proposal does not include the extension public utilities to serve the subject property. Therefore, the proposal is compliant with Statewide Planning Goal 11 (Public Facilities and Services).

Goal 12, Transportation.

Applicant Response: As explained in detail above and within the TIA submitted for this Application (Exhibit C) the Application complies with the Transportation Planning Rule, OAR 660-012-0060, the Rule that implements Goal 12. Compliance with that Rule also demonstrates compliance with Goal 12.

County Finding: Umatilla County finds that the applicant has prepared a TIA demonstrating that the proposed rezone to a service/commercial use will have minimal impact to State Highway 11 and Crockett Road and is not expected to impact the local transportation network. Umatilla County finds that the applicant's request is consistent with Statewide Planning Goal 12 (Transportation).

Goal 13, Energy Conservation.

Applicant Response: The approval of this Application does not impede energy conservation. The Subject Property is located north of Milton-Freewater and immediately adjacent the Ferndale/Crockett commercial node. Allowing the Subject Property to be zoned RRSC will not negatively impact conservation of energy, and may in fact encourage the conservation of energy by allowing the Applicant's existing commercial use to continue and expand onto the Subject Property. Click It RV's location adjacent Highway 11 and the Ferndale/Crockett commercial node will provide a conveniently located service for individuals located along and nearby Highway 11, north of Milton-Freewater.

County Finding: Umatilla County finds that the proposed rezone of this site to allow for the expansion of an RV sales and service business will reduce the distance Umatilla County residents have to travel to purchase or service their recreation vehicles, thereby reducing fossil fuel consumption. Therefore, the applicant's request is consistent with Statewide Planning Goal 13 (Energy).

Goal 14, Urbanization.

Applicant Response: The RRSC zone is an acknowledged rural commercial zoning district that limits the intensity of the uses allowed in the zone and "*is designed to comply with Goal 14*" as is "applied to commercial lands outside unincorporated communities and urban growth boundaries for which an exception to Goal 14 has not been approved." UCDC 152.251 (emphasis added). The compliance of the proposed zoning with Goal 14 is acknowledged by UCDC 152.251, as well as the UCCP which recognizes that "[s]hould increased rural needs for rural "retail/service" designations surpass urbanizing and industrial site availabilities, additional rural lands may be classified commercial upon demonstration of (1) Need for that additional site; (2) Non-availability of appropriate sites in urban growth boundaries and rural industrial areas; (3) Adequate services for that commercial activity; and (4) Compatibility with surrounding land uses." UCCP 18-274. Compliance with the aforementioned UCCP classification criteria is addressed above.

This Application satisfies the requirements for a comprehensive plan designation and zone change as set forth by State Statute, Oregon Administrative Rules, the UCCP, and the UCDC. As such, this

UCCP map amendment and zone change complies with Goal 14.

County Finding: Umatilla County finds that the subject property will retain its “rural” designation after the proposed rezone. Therefore, the applicant’s request is consistent with Statewide Planning Goal 14 (Urbanization).

Goals 15 through 19.

Applicant Response: These Goals do not apply to Umatilla County.

County Finding: Umatilla County finds that Statewide Planning Goals 15-19 are only applicable outside of Umatilla County and do not apply.

D. Oregon Revised Statutes

Chapter 197, Comprehensive Land Use Planning

ORS 197.175(1)

(1) Cities and counties shall exercise their planning and zoning responsibilities, including, but not limited to, a city or special district boundary change which shall mean the annexation of unincorporated territory by a city, the incorporation of a new city and the formation or change of organization of or annexation to any special district authorized by ORS 198.705 (Definitions for ORS 198.705 to 198.955) to 198.955 (Disposition of assets), 199.410 (Policy) to 199.534 (Legislative annexation of territory to cities and districts) or 451.010 (Authorization to establish master plans and service districts) to 451.620 (Procedures for district formed subject to specified dissolution date), in accordance with ORS chapters 195, 196 and 197 and the goals approved under ORS chapters 195, 196 and 197. The Land Conservation and Development Commission shall adopt rules clarifying how the goals apply to the incorporation of a new city. Notwithstanding the provisions of section 15, chapter 827, Oregon Laws 1983, the rules shall take effect upon adoption by the commission. The applicability of rules promulgated under this section to the incorporation of cities prior to August 9, 1983, shall be determined under the laws of this state.

Applicant Response: This is an application for a post-acknowledgement plan amendment. This Application satisfies the applicable Statewide Planning Goals and other applicable administrative rules.

County Finding: Umatilla County finds that the proposal constitutes a post-acknowledgement plan amendment. The application is consistent with the applicable Statewide Planning Goals and applicable Oregon Administrative Rules, and is therefore compliant with ORS 197.175(1).

DECISION: BASED ON THE ABOVE STATED FINDINGS OF FACT AND CONCLUSIONS OF LAW, THE UMATILLA COUNTY BOARD OF COMMISSIONERS HEREBY APPROVES / DENIES PLAN MAP AMENDMENT P-137-24 AND ZONING MAP AMENDMENT Z-324-24

UMATILLA COUNTY BOARD OF COMMISSIONERS

Dated the _____ day of _____, 2024

Celinda A. Timmons, *Commissioner*

John M. Shafer, *Commissioner*

Daniel N. Dorran, *Commissioner*

EXHIBIT A

Vicinity Map

HAAK HOLDINGS LLC, APPLICANT/OWNER

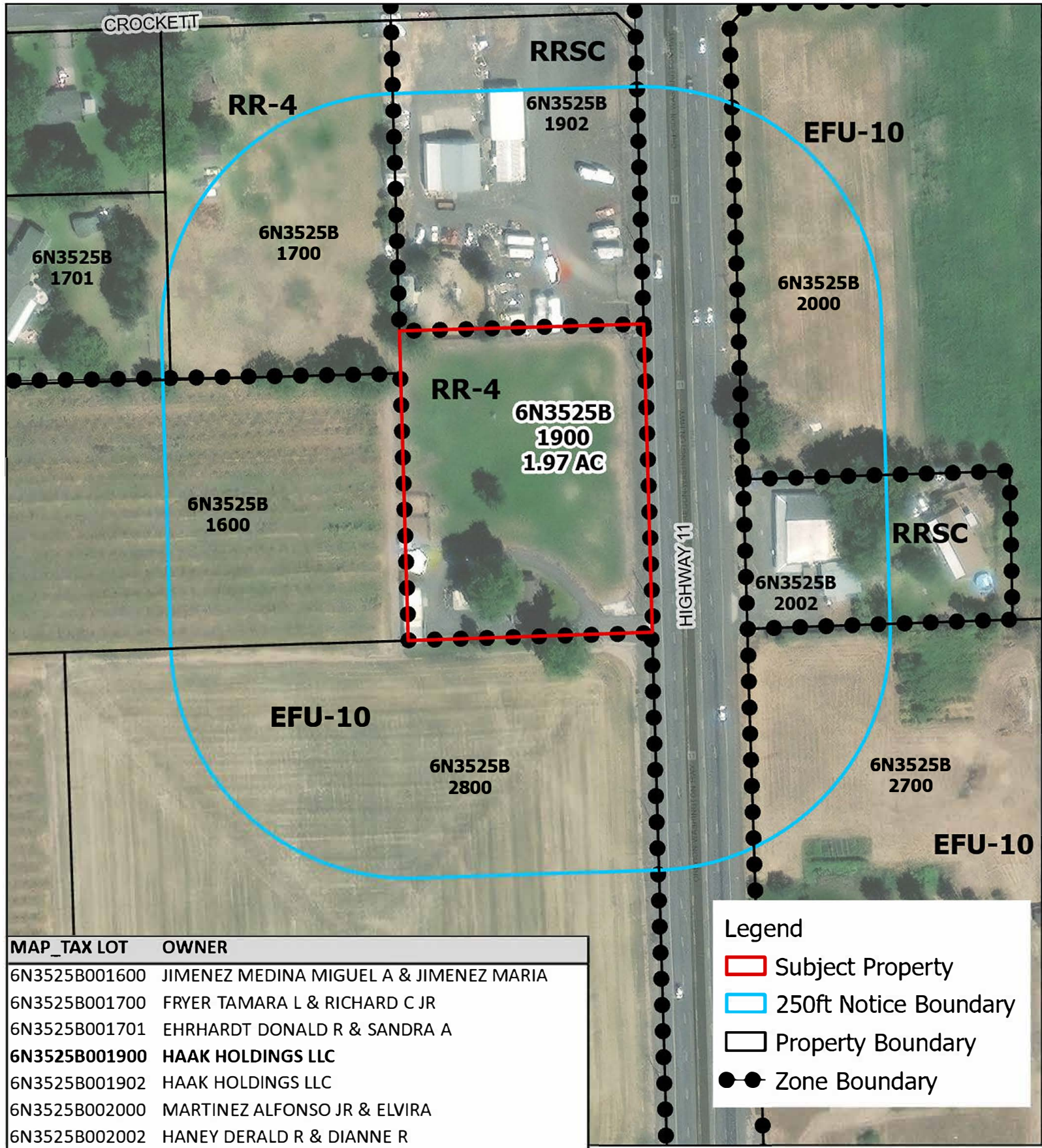
MAP: 6N3525B TAX LOT: 1900

#P-137-24 & #Z-324-24

NOTIFIED PROPERTY OWNERS WITHIN 250 FT OF SUBJECT PROPERTY

N

Map Disclaimer: No warranty is made by Umatilla County as to the accuracy, reliability or completeness of the data. Parcel data should be used for reference purposes only. Created by T. Cimmiyotti, Umatilla County Community Development Planning Division 8/1/2024



MAP_TAX LOT	OWNER
6N3525B001600	JIMENEZ MEDINA MIGUEL A & JIMENEZ MARIA
6N3525B001700	FRYER TAMARA L & RICHARD C JR
6N3525B001701	EHRHARDT DONALD R & SANDRA A
6N3525B001900	HAAK HOLDINGS LLC
6N3525B001902	HAAK HOLDINGS LLC
6N3525B002000	MARTINEZ ALFONSO JR & ELVIRA
6N3525B002002	HANEY DERALD R & DIANNE R UPPER COLUMBIA MISSION SOC OF SDA CHURCH
6N3525B002700	c/o UPPER COLUMBIA CORP OF SEVENTH DAY ADV
6N3525B002800	BLUE MOUNTAIN HAY LLC

Legend

- Subject Property
- 250ft Notice Boundary
- Property Boundary
- Zone Boundary



EXHIBIT B

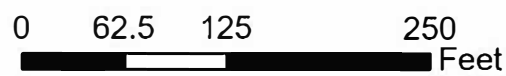
Proposed Rezone Map

HAAK HOLDINGS LLC, APPLICANT/OWNER

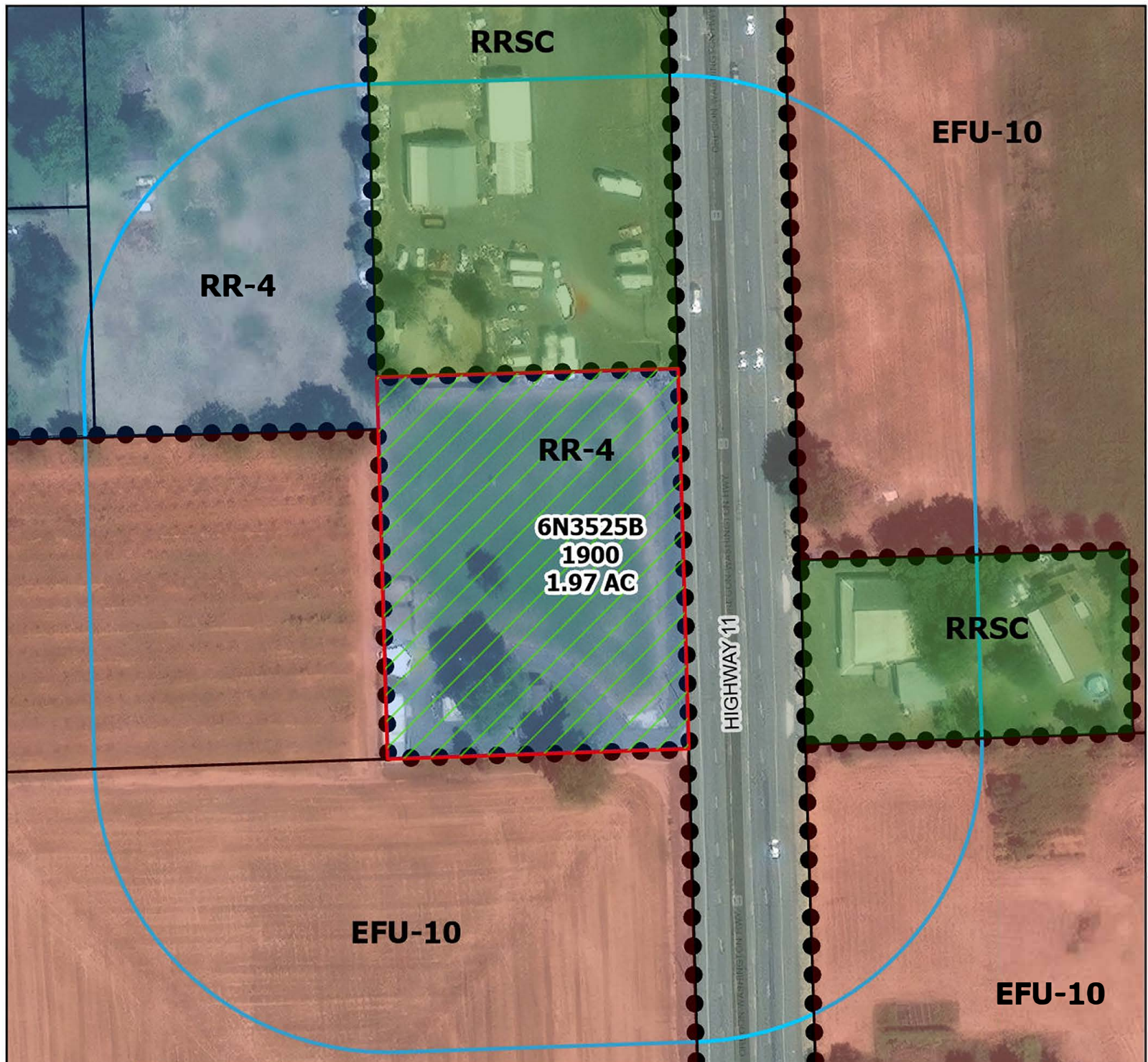
MAP: 6N3525B TAX LOT: 1900

#P-137-24 & #Z-324-24

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NOTIFIED PROPERTY OWNERS WITHIN 250 FT OF SUBJECT PROPERTY



Legend		
Subject Property	Proposed Zone Change to RRSC & Comp Plan Change to Commercial	COMP PLAN: Rural Residential
Property Boundary	COMP PLAN: Orchards District	COMP PLAN: Commercial
250ft Notice Boundary		
Zone Boundary		

EXHIBIT C

Traffic Impact Analysis



May 6, 2024

HAAK Holdings, LLC
Attention: Kim Arrotta
10606 N Newport Highway
Spokane, Washington 99218

c/o Schwabe, Williamson & Wyatt
Attention: Garrett Stephenson and Keenan Ordan-Bakalian
1211 SW 5th Avenue, Suite 1900
Portland, Oregon 97204

Re: **84722 Highway 11 Comprehensive Plan Amendment and Zone Change – Umatilla County, Oregon**
Traffic Impact Analysis

C&A Project Number 20231202.00

Dear Ms. Arrotta,

This Traffic Impact Analysis (TIA) supports the proposed Comprehensive Plan amendment and zone change of the property located at 84722 Highway 11, Milton-Freewater (Umatilla County) Oregon. The following items are presented:

1. Property Description and Proposed Land Use Actions
2. Study Parameters
3. Agency Transportation Plan Review
4. Existing Conditions
5. Site Development
6. Transportation Analysis
7. Site Access
8. Summary

1. PROPERTY DESCRIPTION AND PROPOSED LAND USE ACTIONS

The subject property is located at 84722 Highway 11, Milton-Freewater (Umatilla County) Oregon. The subject property is identified as tax lot 1900 on Umatilla County Assessor's map 6N-35-25B and is approximately 1.97 acres.

The property has frontage on, and access to OR 11 to the east. The site area is illustrated in the attached Figure 1.

Proposed land use actions include a Comprehensive Plan amendment with a plan designation change from Rural Residential to Commercial and a corresponding zone designation change from Rural Residential – 4 Acres (RR-4) to Rural Retail/Service Commercial (RRSC). The existing property zoning designations are illustrated in the attached Figure 2.

The subject property is currently developed with a permitted/allowed single-family residence in the southwest property corner and the remainder of the property is graveled and is conditionally used for the storage of RVs for the RV sales business to the north. It is further noted that specific property redevelopment is not currently contemplated. As such, for transportation analysis purposes, reasonable worst-case development scenarios are assumed in the current and proposed zone designations.

2. STUDY PARAMETERS

The subject land use action is for a Umatilla County Comprehensive Plan amendment and has direct access to a transportation facility under Oregon Department of Transportation (ODOT) jurisdiction. Therefore, the TIS addresses the following criteria:

- Transportation Planning Rule (TPR) criteria outlined in Oregon Administrative Rule (OAR) 660-012-0060
- Umatilla County Development Code (UCDC) Section 152.751 – Compliance With Comprehensive Plan
- UCDC Section 152.019 – Traffic Impact Study
- Oregon Highway Plan criteria

3. AGENCY TRANSPORTATION PLAN REVIEW

Milton-Freewater Stateline Highway 11 Corridor Land Use and Transportation Plan

The *Milton-Freewater Stateline Highway 11 Corridor Land Use and Transportation Plan* is a refinement plan for the OR 11 Corridor which focuses on the OR 11 Corridor between Milton-Freewater and Stateline Road. The plan was a cooperative effort of Umatilla County, the city of Milton-Freewater, and ODOT.

Plan projects and strategies focus on managing the highway to minimize congestion and improve connectivity while ensuring safety.

Based on average highway speeds and the number of crashes, ODOT has designated the section of OR 11 between the Oregon-Washington border and Elizabeth Street as a traffic safety corridor.

The primary OR 11 corridor deficiencies include facility design, insufficient access control, and inadequate or nonexistent facilities for pedestrians and bicyclists. The recommended actions to improve these corridor conditions include policy and ordinance amendments and transportation system improvements. Specific to the project area, improvements at the OR 11/Crockett Road intersection included improving the Crockett Road approach grades to OR 11 and increasing the intersection corner radii – both of which have been constructed.

Umatilla County Transportation System Plan (TSP)

The Umatilla County TSP does not contain any funded transportation-related projects in the project area or identify any unique issues; however, it does incorporate by reference the materials and findings contained in the *Milton-Freewater Stateline Highway 11 Corridor Land Use and Transportation Plan* described above.

ODOT Statewide Transportation Improvement Program (STIP)

A review of the ODOT Active 2024-2027 Statewide Transportation Improvement Program (STIP) finds that there is one project in the area, Key 22989 – OR11: Milton-Freewater Safety and Sidewalk Improvements that is described as *“Convert existing 5-lane section to 3-lane to include bike and right turn lanes to reduce crashes and improve safety and construct sidewalks between 8th Street and Cobb Street to encourage pedestrian use and provide safe pedestrian access to transit.”* The project is partially funded (i.e., it is funded through the relocation of utilities), and it is not anticipated to start until the federal fiscal year 2025.

4. EXISTING CONDITIONS

Roadway Facilities

The following table summarizes existing roadway classifications and characteristics within the study area.

TABLE 1 – EXISTING ROADWAY CHARACTERISTICS						
Roadway	Functional Classification	Lanes	Speed Limit (MPH)	Sidewalks	Bicycle Lanes	On-Street Parking
OR 11	Statewide Highway (ODOT)	5	50	No	Shoulders ≈8'	No
Crockett Road	Major Collector (E/O OR 11) Local (W/O OR 11)	2	Not Posted	No	No	No

Safety Analysis

When evaluating roadway and intersection safety, consideration is given to the total number and types of crashes occurring, and the number of vehicles traveling on a roadway segment or entering the intersection. This leads to the concept known as the “crash rate.” Specific to intersections, it is typically expressed in terms of the number of crashes occurring per one million vehicles entering the intersection (CMEV). A critical crash rate analysis is then performed by comparing the subject intersection to the published statewide 90th percentile intersection crash rates at comparable/reference intersections. Crash rates close to or exceeding 1.0 CMEV or the 90th percentile rates require further analysis.

Study area crash data were obtained from the Oregon Department of Transportation (ODOT) for five years from January 1, 2018 through December 31, 2022. The following table presents the study intersection crash rates and critical crash analysis. Crash data and crash rate calculations are attached for reference. Crash locations are illustrated in the attached Figure 3.

TABLE 2 – INTERSECTION CRASH RATES										
Intersection	2018	2019	2020	2021	2022	Total	Crash Rate (CMEV)	Reference Population ¹	90 th Percentile Crash Rate	Over or under Crash Rate?
OR 11 / Crockett Road	1	0	2	3	1	7	0.303	Urban 4ST	0.408	Under
OR 11 / Applegate Road	0	0	0	1	0	1	0.043	Urban 4ST	0.408	Under

¹ 4ST is a four-leg m-nor stop-control intersection.

The study intersection observed crash rates are less than the 1.0 CMEV threshold and the 90th percentile crash rate of the reference population, indicating the intersections are considered relatively safe, and further safety analysis is not warranted.

The most recent 2022 ODOT Safety Priority Index System (SPIS) data for OR 11 in the project area was also obtained. The SPIS is a systemic scoring method that identifies potential safety problems and is based on three years of crash data considering frequency, rate, and severity. A roadway segment becomes a SPIS site if a location has three or more crashes or one or more fatal crashes over three years. It evaluates overlapping road segments, so an individual location may be reported in multiple segments. ODOT screens these segments annually to identify and prioritize sites and those with a SPIS score in the top 15% of sites within a Region merit further investigation to identify potential safety improvements. A copy of the SPIS data is attached for reference.

A review of the data for the OR 11 segment adjacent to the subject property finds SPIS scores ranging from 47.74 to 62.63, all of which are in the top 15% of sites in Region 5, primarily due to crashes at the OR 11/Crockett Road intersection. As such, an ODOT safety investigation report needs to be prepared to determine potential remedies. While online ODOT report data is not readily available, a review of the detailed ODOT crash reports finds that of the seven OR 11/Crockett Road intersection crashes, six involved turning movements (two left and four right), five were caused by a driver not yielding the right-of-way, and there were multiple driver errors.

Overall, there is no clearly defined safety deficiency, and the crash types are consistent with two-way stop-controlled intersections. Further, the intersection crash rate is less than the crash rate of the statewide reference population. Regardless, it is noted that this section of OR 11 is designated as a safety corridor and there is a partially funded STIP project that will convert the existing 5-lane section of OR 11 to 3 lanes to include bike and right-turn lanes to reduce crashes and improve safety.

5. SITE DEVELOPMENT

Development Assumptions

The proposed land use actions do not include a specific development application. As such, this transportation analysis evaluates reasonable worst-case development scenario impacts in the proposed RRSC, and the current RR-4 zone designations based on the allowed land use identified in the UCDC.

Proposed RRSC Zone Assumptions

- The zone is designed to provide areas outside of urban growth boundaries and unincorporated communities for specific commercial activities requiring larger sites than are available inside an urban growth boundary and provide for retail and service-oriented commercial activities to accommodate rural residences. The RRSC zone intends to permit the continuation and expansion of existing uses and to provide rural employment opportunities for new uses that are generally rural-scale and low impact.
- Higher trip-generating permitted uses include automobile service stations, automobile, truck, or motorcycle sales lots, eating or drinking establishments, food stores, motels (up to 35 units), offices, and retail sales outlets.
- Except for motels as described above, buildings shall not exceed 3,500 square feet of floor space.
- Given the geographic location, service/utility availability, and existing development types north of Milton-Freewater, several of the permitted uses identified above are not practical/reasonable. As such, reasonable worst-case development is assumed to be a 3,500-square-foot convenience store with 8-vehicle fueling positions.

Current RR-4 Zone Assumptions

- The zone is designed to provide lands to enhance the value of rural living and maintain a rural residential atmosphere while accommodating the demand for rural residences. Lots need to be sufficiently large to accommodate private wells and sewage disposal systems as well as gardens and farm animals.
- The minimum lot area for a principal dwelling is four acres (or less for pre-existing non-conforming lots of record).
- The gross site area of tax lot 1900 is 1.97 acres.
- The maximum residential density is 1 unit per four acres – resulting in 1 single-family residence.

Development Trip Generation

Using the above-identified development assumptions, trip generation in the proposed and current Umatilla County zone designations is estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition, and practices from the ITE *Trip Generation Handbook*, 3rd Edition. Trip generation is as follows:

TABLE 3 – DEVELOPMENT TRIP GENERATION – UMATILLA COUNTY ZONING						
Reasonable Worst-Case Development Assumption	ITE Code	Size	Daily Trips ¹	PM Peak Hour ¹		
				Enter	Exit	Total
Proposed RRSC Zone Designation						
Convenience Store/Gas Station - GFA (2-4k)	945	8 VFP	2,121	74	73	147
<i>Pass-By / Diverted-Linked Trips (56% Daily / 56% PM)²</i>			<i>(1,188)</i>	<i>(41)</i>	<i>(41)</i>	<i>(82)</i>
Current RR-4 Zone Designation						
Single-Family Detached Housing	210	1 DU	9	1	0	1
Change in Trip Generation with Proposed Zone Change			924	32	32	64

¹ Trip generation estimated using the *Average Rate* per recommended practice in the ITE *Trip Generation Handbook*, 3rd Edition.
² Daily pass-by trips are assumed to be approximately 56%. Per ITE, AM is 62% and PM is 56%.

As identified in the table above, reasonable worst-case development in the proposed RRSC zone designation generates a maximum of 924 daily and 64 PM additional trips over the current RR-4 zone designation.

6. TRANSPORTATION ANALYSIS

Transportation Planning Rule (TPR) Criteria

OAR 660-012-0060 (1) states, “If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

(b) Change standards implementing a functional classification system; or

(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.”

OAR 660-012-0060 (9) states, “Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned transportation facility if all of the following requirements are met.

(a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map;

(b) The local government has an acknowledged TSP and the proposed zoning is consistent with the TSP; and

(c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule, but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area.”

Oregon Highway Plan Considerations

Oregon Highway Plan Action 1F.5, states “For purposes of evaluating amendments to transportation system plans, acknowledged comprehensive plans, and land use regulations subject to OAR 660-12-0060, in situations where the volume-to-capacity ratio or alternative mobility target for a highway segment, intersection, or interchange is currently above the mobility targets in Table 6 or Table 7 or those otherwise approved by the Oregon Transportation Commission, or is projected to be above the mobility targets at the planning horizon, and transportation improvements are not planned within the planning horizon to bring performance to the established target, the mobility target is to avoid further degradation. If an amendment subject to OAR 660-012-0060 increases the volume-to-capacity ratio further or degrades the performance of a facility so that it does not meet an adopted mobility target at the planning horizon, it will significantly affect the facility unless it falls within the thresholds listed below for a small increase in traffic.

In addition to the capacity-increasing improvements that may be required to mitigate impacts, other performance-improving actions to consider include, but are not limited to:

- *System connectivity improvements for vehicles, bicycles, and pedestrians.*
- *Transportation demand management (TDM) methods to reduce the need for additional capacity.*
- *Multi-modal (bicycle, pedestrian, transit) opportunities to reduce vehicle demand.*
- *Operational improvements to maximize the use of the existing system.*
- *Land use techniques such as trip caps/budgets to manage trip generation.*

In applying “avoid further degradation” for state highway facilities already operating above the mobility targets in Table 6 or Table 7 or those otherwise approved by the Oregon Transportation Commission, or facilities projected to be above the mobility targets at the planning horizon, a small increase in traffic does not cause “further degradation” of the facility.

The threshold for a small increase in traffic between the existing plan and the proposed amendment is defined in terms of the increase in total average daily trip volumes as follows:

- *Any proposed amendment that does not increase the average daily trips by more than 400.*
- *Any proposed amendment that increases the average daily trips by more than 400 but less than 1,001 for state facilities where:*
 - *The annual average daily traffic is less than 5,000 for a two-lane highway.*
 - *The annual average daily traffic is less than 15,000 for a three-lane highway.*
 - *The annual average daily traffic is less than 10,000 for a four-lane highway.*
 - *The annual average daily traffic is less than 25,000 for a five-lane highway.*
- *If the increase in traffic between the existing plan and the proposed amendment is more than 1,000 average daily trips, then it is not considered a small increase in traffic and the amendment causes further degradation of the facility and would be subject to existing processes for resolution.*

In applying OHP mobility targets to analyze mitigation, ODOT recognizes that there are many variables and levels of uncertainty in calculating volume-to-capacity ratios, particularly over a specified planning horizon. After negotiating reasonable levels of mitigation for actions required under OAR 660-012-0060, ODOT considers calculated values for v/c ratios that are within 0.03 of the adopted targets in the OHP to be considered in compliance with the target. The adopted mobility target still applies for determining significant affect under OAR 660-012-0060.

Based on traffic counts used in the 2022 ODOT Safety Priority Index System (SPIS) data for OR 11, the roadway Annual Average Daily traffic (AADT) in the project area is 12,645. The proposed zone change from RR-4 to RRSC results in a potential 924 daily trip increase which is less than the 1,000 average daily trip threshold identified in the OHP requiring a TPR analysis – noting that OR 11 is a 5-lane highway with less than 25,000 AADT (or a future 3-lane highway with less than 15,000 AADT).

Overall, the proposed Comprehensive Plan amendment and zone change results in a small increase in traffic and will not significantly affect an existing or planned transportation facility. As such, it can be found that the TPR criteria outlined in OAR 660-012-0060 are satisfied without the need for additional transportation analysis.

7. SITE ACCESS

The property has frontage on, and currently has direct access to OR 11 to the east. It is anticipated that future development on the property will also have direct access to OR 11 and any right of access will have to be approved by ODOT at the time of a specific land use application.

It is anticipated the (future) applicant will construct any necessary frontage improvements at the time of development (as part of a future, specific development land use application).

8. SUMMARY

The following conclusions and recommendations are made based on materials contained in this analysis:

1. The subject property is located at 84722 Highway 11, Milton-Freewater (Umatilla County) Oregon. The subject property is identified as tax lot 1900 on Umatilla County Assessor's map 6N-35-25B and is approximately 1.97 acres. The property has frontage on, and access to OR 11 to the east.
2. Proposed land use actions include a Comprehensive Plan amendment with a plan designation change from Rural Residential to Commercial and a corresponding zone designation change from Rural Residential – 4 Acres (RR-4) to Rural Retail/Service Commercial (RRSC).
3. The subject property is currently developed with a permitted/allowed single-family residence in the southwest property corner and the remainder of the property is graveled and is conditionally used for the storage of RVs for the RV sales business to the north. It is further noted that specific property redevelopment is not currently contemplated. As such, for transportation analysis purposes, reasonable worst-case development scenarios are assumed in the current and proposed zone designations.
4. Based on average highway speeds and the number of crashes, ODOT has designated the section of OR 11 between the Oregon-Washington border and Elizabeth Street (which includes the project area) as a traffic safety corridor. The primary OR 11 corridor deficiencies include facility design, insufficient access control, and inadequate or nonexistent facilities for pedestrians and bicyclists.

5. The ODOT Active 2024-2027 Statewide Transportation Improvement Program (STIP) contains one project in the area, Key 22989 – OR11: Milton-Freewater Safety and Sidewalk Improvements that is described as *“Convert existing 5-lane section to 3-lane to include bike and right turn lanes to reduce crashes and improve safety and construct sidewalks between 8th Street and Cobb Street to encourage pedestrian use and provide safe pedestrian access to transit.”* The project is partially funded (i.e., it is funded through the relocation of utilities), and it is not anticipated to start until the federal fiscal year 2025.
6. The study intersection observed crash rates are less than the 1.0 CMEV threshold and the 90th percentile crash rate of the reference population, indicating the intersections are considered relatively safe, and further safety analysis is not warranted.
7. The section of OR 11 adjacent to the subject property has SPIS scores in the top 15% of sites in Region 5, primarily due to crashes at the OR 11/Crockett Road intersection. A review of the detailed ODOT crash report finds that there is no clearly defined safety deficiency, and the crash types are consistent with two-way stop-controlled intersections. Regardless, it is noted that this section of OR 11 is designated as a safety corridor and there is a partially funded STIP project that will convert the existing 5-lane section of OR 11 to 3 lanes to include bike and right-turn lanes to reduce crashes and improve safety.
8. Reasonable worst-case development in the proposed RRSC zone designation generates a maximum of 924 daily and 64 PM additional trips over the current RR-4 zone designation. The potential trip increase is less than the 1,000 average daily trip threshold identified in the OHP requiring a TPR analysis – noting that OR 11 is a 5-lane highway with less than 25,000 AADT (or a future 3-lane highway with less than 15,000 AADT).
9. Overall, the proposed Comprehensive Plan amendment and zone change results in a small increase in traffic and will not significantly affect an existing or planned transportation facility. As such, it can be found that the TPR criteria outlined in OAR 660-012-0060 are satisfied without the need for additional transportation analysis.
10. It is anticipated that future development on the property will have direct access to OR 11 and any right of access will have to be approved by ODOT at the time of a specific land use application.
11. It is anticipated the (future) applicant will construct any necessary frontage improvements at the time of development (as part of a future, specific development land use application).

Sincerely,

Christopher M. Clemow, PE, PTOE

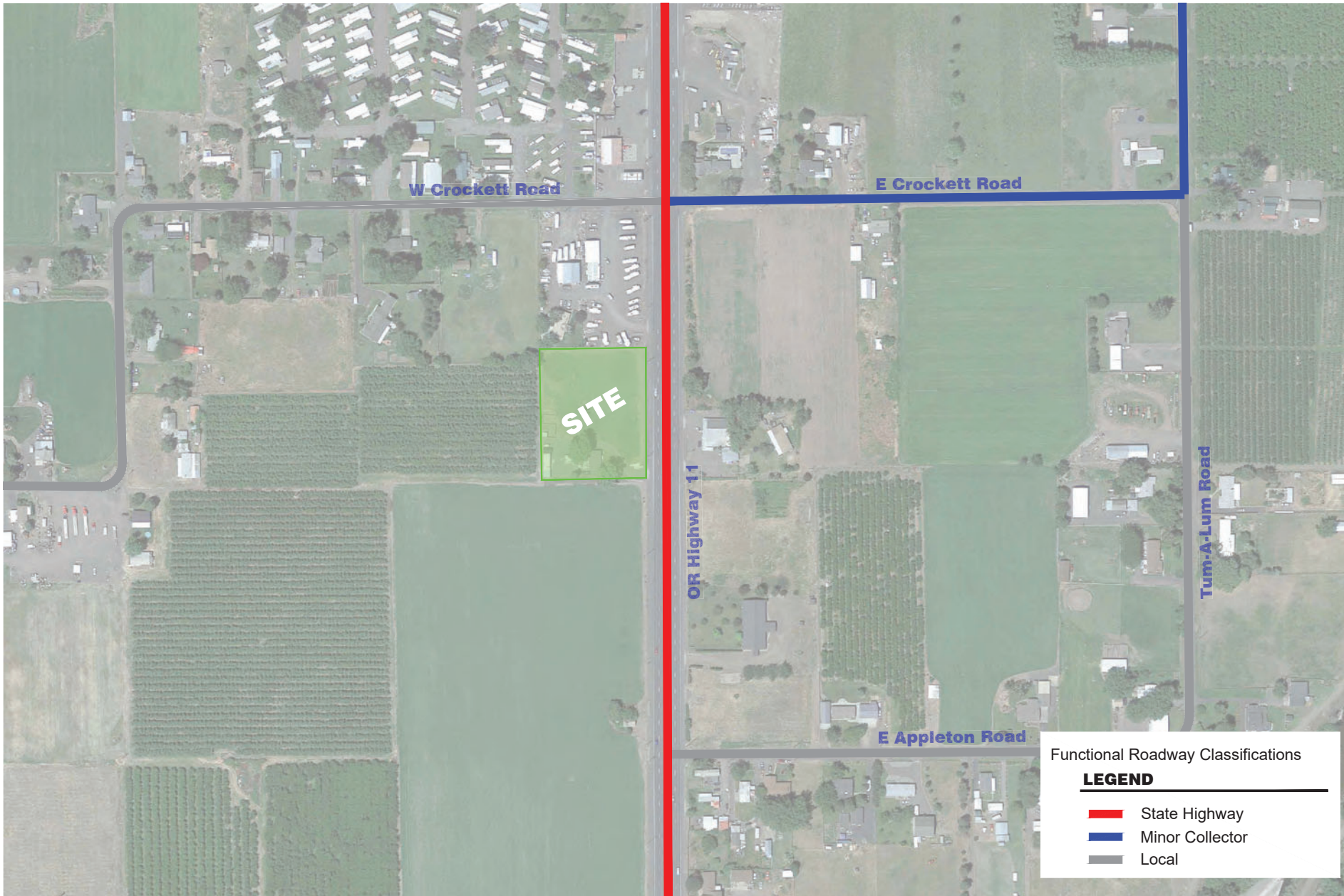
Christopher M.
Clemow

Digital Signer: Christopher M Clemow
DN: C=US, E=clemow@clemow-associates.com, O=Clemow & Associates,
OU=CM, CN=Christopher M Clemow
Date: 2024.05.06
10:39:04 -07:00

Transportation Engineer



Attachments: Figures 1, 2, and 3
Crash and SPIS Data



Functional Roadway Classifications

LEGEND

- █ State Highway
- █ Minor Collector
- █ Local

2237 NW Torrey Pines Drive
 Bend, Oregon 97703
 541-579-8315
 clemow@clemow-associates.com

SITE AREA

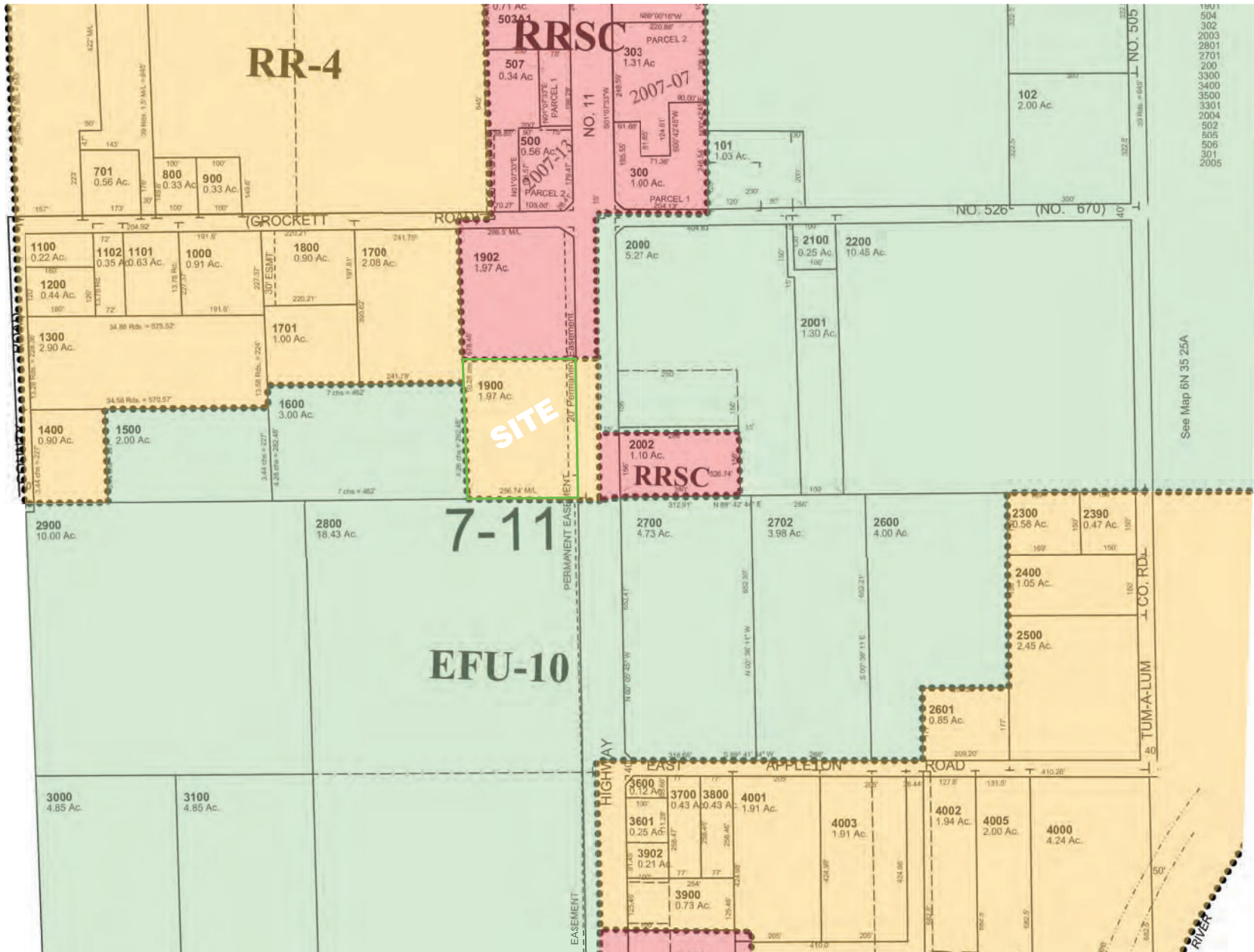
84722 Highway 11 Comprehensive Plan Amendment and Zone Change - Umatilla County, Oregon

C&A Project No. 20231202.00

FIGURE

1





See Map 6N 35 26A

See Map 6N 35 25A



2237 NW Torrey Pines Drive
 Bend, Oregon 97703
 541-579-8315
 cclemow@clemow-associates.com

CURRENT ZONE DESIGNATIONS

84722 Highway 11 Comprehensive Plan Amendment and Zone Change - Umatilla County, Oregon

C&A Project No. 20231202.00

FIGURE

2



2237 NW Torrey Pines Drive
 Bend, Oregon 97703
 541-579-8315
 cclemow@clemow-associates.com

CRASH LOCATIONS

84722 Highway 11 Comprehensive Plan Amendment and Zone Change - Umatilla County, Oregon

C&A Project No. 20231202.00

FIGURE

3

January 1, 2018 through December 31, 2017

INTERSECTION CRASH RATES													
Intersection	Crashes						ADT (ODOT)	AADT (365xADT)	Annual Crashes	Crash Rate (CMEV)	Reference Population	90th%ile Crash Rate	Over or Under Crash
	2018	2019	2020	2021	2022	Total							
OR 11 / Crockett Road	1	0	2	3	1	7	12,645	4,615,425	1.40	0.303	Urban 4ST	0.408	Under
OR 11 / Appleton Road	0	0	0	1	0	1	12,645	4,615,425	0.20	0.043	Urban 4ST	0.408	Under



Oregon Department of Transportation

Region

2022 - On-State, All SPIS Sites - By Hwy, MP

5

Rte	Rdwy	BMP	EMP	ADT	Crash	Fatal	A	B	C	City	County	Connection	Percent	SPIS
008 Oregon-Washington														
OR-11	1	33.44	33.53	12,645	5	0	3	0	2		Umanilla	CROCKETT RD.	95	62.63
OR-11	1	33.45	33.54	12,645	4	0	2	0	2		Umanilla	CROCKETT RD.	90	47.74

Intersection crash rates also need to be compared to the published statewide 90th percentile intersection crash rates in Exhibit 4-1. Any rates close to or over the 90th percentile rates need to be flagged for further analysis. The intersection crash rate is calculated by the following formula:

$$\text{Intersection Crash Rate per MEV} = \frac{\text{Annual Number of Crashes} \times 10^6}{(\text{AADT}) \times (365 \text{ days/year})}$$

The values shown in Exhibit 4-1 represent the 90th percentile crash rates from a study of 500 intersections in Oregon. The crash rates are grouped by rural/urban, signalized/unsignalized, and three-leg/four-leg intersections. Intersections with crash rates that exceed the 90th percentile values shown in the table should be flagged for further analysis. For more information on crash rates and using this table, see Section 4.3.4 Critical Crash Rate.

Exhibit 4-1: Intersection Crash Rates per MEV by Land Type and Traffic Control

	Rural				Urban			
	3SG	3ST	4SG	4ST	3SG	3ST	4SG	4ST
No. of Intersections	7	115	20	60	55	77	106	60
Mean Crash Rate	0.226	0.196	0.324	0.434	0.275	0.131	0.477	0.198
Median Crash Rate	0.163	0.092	0.320	0.267	0.252	0.105	0.420	0.145
Standard Deviation	0.185	0.314	0.223	0.534	0.155	0.121	0.273	0.176
Coefficient of Variation	0.819	1.602	0.688	1.230	0.564	0.924	0.572	0.889
90 th Percentile Rate	0.464	0.475	0.579	1.080	0.509	0.293	0.860	0.408

Source: Assessment of Statewide Intersection Safety Performance, FHWA-OR-RD-18, Portland State University and Oregon State University, June 2011, Table 4.1, p. 47.

Note: Traffic control types include
 3SG (three-leg signalized),
 3ST (three-leg minor stop-control),
 4SG (four-leg signalized),
 4ST (four-leg minor stop-control).

For intersections other than the configurations shown in Exhibit 4-1, there are usually too few locations with that intersection configuration to provide statewide statistics. There are some stop controlled intersection configurations that could be approximated as indicated in Exhibit 4-2 and Exhibit 4-3 below. Any other intersection configurations not in Exhibit 4-1, Exhibit 4-2, or Exhibit 4-3 should by default be flagged for further analysis, since the unusual configuration is likely to warrant a closer look at the crashes.

OREGON DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
CONTINUOUS SYSTEM CRASH LISTING

008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

1 - 3 of 18 Crash records shown.

SER#	S	D	M	P	R	J	S	W	DATE	COUNTY	RD#	FC	CONN#	RD CHAR	INT-TYPE	INT-REL	OFFRDT	WTHR	CRASH	SPCL USE	MOVE	A	S	PED	ERROR	ACT	EVENT	CAUSE	
INVEST	E	A	U	I	C	O	DAY			CITY	COMPNT	FIRST STREET	DIRECT	(MEDIAN)			RNDT	SURF	COLL	TRLR QTY	FROM								
RD DPT	E	L	G	N	H	R	TIME			URBAN AREA	MLG TYP	SECOND STREET	LOCTN	LEGS	TRAF-CONTL	DRVWY	LIGHT	SVRTY	V#	OWNER	TO								
UNLOC7	D	C	S	V	L	K	LAT			LONG	MILEPNT	LRS		(#LANES)						#	TYPE	SVRTY	E	X	RES	LOC			
01007	N	N	N	N			12/07/2021			UMATILLA	1	14		INTER	3-LEG	N	N	CLR	ANGL-OTH	01	NONE	0							
STATE							TU				MN	0		CN	(NONE)	UNKNOWN	N	DRY	SS-O	N/A									
N							5P			MILT-FRE UA	33.28		02	0	STOP SIGN	N	DARK	INJ		PSNGR	CAR				028	000	000	02	
N							45 58 16.15			-118 23 14.02					(04)														

OREGON DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
CONTINUOUS SYSTEM CRASH LISTING

008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 811.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to customers. However, because submittal of crash report forms is the responsibility of the individual driver, the Crash Analysis and Reporting Unit can not guarantee that all qualifying crashes are represented nor can assurances be made that all details pertaining to a single crash are accurate. Note: Legislative changes to DMV's vehicle crash reporting requirement, effective 01/01/2004, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.

008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

OREGON DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
CONTINUOUS SYSTEM CRASH LISTING

008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

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008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

OREGON DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
CONTINUOUS SYSTEM CRASH LISTING

008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

18 - 18 of 18 Crash records shown.

SER#	P	R	J	S	W	DATE	COUNTY	RD#	FC	CONN#	RD CHAR	INT-TYPE	OFFRD	WTHR	CRASH	SPCL USE	TRLR	QTY	MOVE	OWNER	FROM	PRTC	INJ	G	E	LICNS	PED	ERROR	ACT	EVENT	CAUSE			
INVEST	E	A	U	I	C	O	CITY	COMPNT	FIRST	STREET	DIRECT	(MEDIAN)	INT-REL	RNDBT	SURF	COLL	TRLR	QTY	MOVE	OWNER	FROM	PRTC	INJ	G	E	LICNS	PED	ERROR	ACT	EVENT	CAUSE			
RD DPT	E	L	G	N	H	R	URBAN AREA	MLG	TYP	SECOND	STREET	LOCTN	LEGS	TRAF-	RNDBT	SURF	COLL	TRLR	QTY	MOVE	OWNER	FROM	PRTC	INJ	G	E	LICNS	PED	ERROR	ACT	EVENT	CAUSE		
UNLOC?	D	C	S	V	L	K	LONG	MILEPNT	LRS			(#LANES)	CONTL	DRVWY	LIGHT	SVRTY	V#	TYPE	TO			P#	TYPE	SVRTY	E	X	RES	LOC	ERROR	ACT	EVENT	CAUSE		
																	01	NONE	0	STRGHT														
																				PRVTE												000	00	
																				PSNGR	CAR	02	PSNG	INJC	60	F						000	000	00
																				02	NONE	0												
																				PRVTE												019	013	00
																				PSNGR	CAR	01	DRVR	INJC	46	M	OTH-Y					016,004,028	038	27,08,02
																				03	NONE	0												
																				PRVTE													022	00
																				PSNGR	CAR	01	DRVR	NONE	32	M	OR-Y					000	000	00

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008: OREGON-WASHINGTON

Highway 008 ALL ROAD TYPES, MP 33.2 to 33.6 01/01/2018 to 12/31/2022, Both Add and Non-Add mileage

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OREGON.. DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
COUNTY ROAD CRASH LISTING

UMATILLA COUNTY

CROCKETT RD, MP -999.99 to 999.99, 01/01/2018 to 12/31/2022

1 - 1 of 1 Crash records shown.

SER#	P	R	J	S	W	DATE	MILEPNT	COUNTY ROADS	INT-TYPE	SPCL USE	ACT	EVENT	CAUSE																
INVEST	E	A	U	I	C	O	DAY	DIST FROM	FIRST STREET	RD CHAR	(MEDIAN)	INT-REL	OFFRD	WTHR	CRASH	TRLR	QTY	MOVE	A	S									
RD DPT	E	L	G	N	H	R	TIME	INTERSECT	SECOND STREET	DIRECT	LEGS	TRAF-	RNDBT	SURF	COLL	OWNER	FROM	PRTC	INJ	G	E	LICNS	PED						
UNLOC?	D	C	S	V	L	K	LAT	LONG	LRS	LOCTN	(#LANES)	CONTL	DRVWY	LIGHT	SVRTY	V#	TYPE	TO	P#	TYPE	SVRTY	E	X	RES	LOC	ERROR	ACT	EVENT	CAUSE
00603	N	N	N	N	N	N	09/05/2020	0.90	CROCKETT RD	STRGHT		N	Y	UNK	FIX OBJ	01	NONE	9	STRGHT									100	10
COUNTY							SA			UN	(NONE)	UNKNOWN	N	UNK	FIX	N/A		UN-UN										000	00
Y							1P			00			N	DAY	PDO	PSNGR	CAR		01	DRVR	NONE	00	Unk	UNK		000	000	000	00
N							45 58 29.51	-118 23 29.58			(02)																		

Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 811.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to customers. However, because submittal of crash report forms is the responsibility of the individual driver, the Crash Analysis and Reporting Unit can not guarantee that all qualifying crashes are represented nor can assurances be made that all details pertaining to a single crash are accurate. Note: Legislative changes to DMV's vehicle crash reporting requirement, effective 01/01/2004, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.

UMATILLA COUNTY

OREGON . . DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
COUNTY ROAD CRASH LISTING
CROCKETT RD, MP -999.99 to 999.99, 01/01/2018 to 12/31/2022

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ACTION CODE TRANSLATION LIST

ACTION CODE	SHORT DESCRIPTION	LONG DESCRIPTION
000	NONE	NO ACTION OR NON-WARRANTED
001	SKIDDED	SKIDDED
002	ON/OFF V	GETTING ON OR OFF STOPPED OR PARKED VEHICLE
003	LOAD OVR	OVERHANGING LOAD STRUCK ANOTHER VEHICLE, ETC.
006	SLOW DN	SLOWED DOWN
007	AVOIDING	AVOIDING MANEUVER
008	PAR PARK	PARALLEL PARKING
009	ANG PARK	ANGLE PARKING
010	INTERFERE	PASSENGER INTERFERING WITH DRIVER
011	STOPPED	STOPPED IN TRAFFIC NOT WAITING TO MAKE A LEFT TURN
012	STP/L TRN	STOPPED BECAUSE OF LEFT TURN SIGNAL OR WAITING, ETC.
013	STP TURN	STOPPED WHILE EXECUTING A TURN
014	EMR V PKD	EMERGENCY VEHICLE LEGALLY PARKED IN THE ROADWAY
015	GO A/STOP	PROCEED AFTER STOPPING FOR A STOP SIGN/FLASHING RED.
016	TRN A/RED	TURNED ON RED AFTER STOPPING
017	LOSTCTRL	LOST CONTROL OF VEHICLE
018	EXIT DWY	ENTERING STREET OR HIGHWAY FROM ALLEY OR DRIVEWAY
019	ENR DWY	ENTERING ALLEY OR DRIVEWAY FROM STREET OR HIGHWAY
020	STR ENTR	BEFORE ENTERING ROADWAY, STRUCK PEDESTRIAN, ETC. ON SIDEWALK OR SHOULDER
021	NO DRVR	CAR RAN AWAY - NO DRIVER
022	PREV COL	STRUCK, OR WAS STRUCK BY, VEHICLE OR PEDESTRIAN IN PRIOR COLLISION BEFORE ACC. STABILIZED
023	STALLED	VEHICLE STALLED OR DISABLED
024	DRVR DEAD	DEAD BY UNASSOCIATED CAUSE
025	FATIGUE	FATIGUED, SLEEPY, ASLEEP
026	SUN	DRIVER BLINDED BY SUN
027	HDLGHTS	DRIVER BLINDED BY HEADLIGHTS
028	ILLNESS	PHYSICALLY ILL
029	THRU MED	VEHICLE CROSSED, PLUNGED OVER, OR THROUGH MEDIAN BARRIER
030	PURSUIT	PURSUIING OR ATTEMPTING TO STOP A VEHICLE
031	PASSING	PASSING SITUATION
032	PRKOFFRD	VEHICLE PARKED BEYOND CURB OR SHOULDER
033	CROS MED	VEHICLE CROSSED EARTH OR GRASS MEDIAN
034	X N/SGNL	CROSSING AT INTERSECTION - NO TRAFFIC SIGNAL PRESENT
035	X W/ SGNL	CROSSING AT INTERSECTION - TRAFFIC SIGNAL PRESENT
036	DIAGONAL	CROSSING AT INTERSECTION - DIAGONALLY
037	BTWN INT	CROSSING BETWEEN INTERSECTIONS
038	DISTRACT	DRIVER'S ATTENTION DISTRACTED
039	W/TRAF-S	WALKING, RUNNING, RIDING, ETC., ON SHOULDER WITH TRAFFIC
040	A/TRAF-S	WALKING, RUNNING, RIDING, ETC., ON SHOULDER FACING TRAFFIC
041	W/TRAF-P	WALKING, RUNNING, RIDING, ETC., ON PAVEMENT WITH TRAFFIC
042	A/TRAF-P	WALKING, RUNNING, RIDING, ETC., ON PAVEMENT FACING TRAFFIC
043	PLAYINRD	PLAYING IN STREET OR ROAD
044	PUSH MV	PUSHING OR WORKING ON VEHICLE IN ROAD OR ON SHOULDER
045	WORK ON	WORKING IN ROADWAY OR ALONG SHOULDER
046	W/ TRAFIC	NON-MOTORIST WALKING, RUNNING, RIDING, ETC. WITH TRAFFIC
	A/ TRAFIC	NON-MOTORIST WALKING, RUNNING, RIDING, ETC. FACING TRAFFIC
	LAY ON RD	STANDING OR LYING IN ROADWAY
	ENT OFFRD	ENTERING / STARTING IN TRAFFIC LANE FROM OFF ROAD
	MERGING	MERGING
	SPRAY	BLINDED BY WATER SPRAY

ACTION CODE TRANSLATION LIST

ACTION CODE	SHORT DESCRIPTION	LONG DESCRIPTION
088	OTHER	OTHER ACTION
099	UNK	UNKNOWN ACTION

CAUSE CODE TRANSLATION LIST

CAUSE CODE	SHORT DESCRIPTION	LONG DESCRIPTION
00	NO CODE	NO CAUSE ASSOCIATED AT THIS LEVEL
01	TOO-FAST	TOO FAST FOR CONDITIONS (NOT EXCEED POSTED SPEED
02	NO-YIELD	DID NOT YIELD RIGHT-OF-WAY
03	PAS-STOP	PASSED STOP SIGN OR RED FLASHER
04	DIS SIG	DISREGARDED TRAFFIC SIGNAL
05	LEFT-CTR	DROVE LEFT OF CENTER ON TWO-WAY ROAD; STRADDLING
06	IMP-OVER	IMPROPER OVERTAKING
07	TOO-CLOS	FOLLOWED TOO CLOSELY
08	IMP-TURN	MADE IMPROPER TURN
09	DRINKING	ALCOHOL OR DRUG INVOLVED
10	OTHR-IMP	OTHER IMPROPER DRIVING
11	MECH-DEF	MECHANICAL DEFECT
12	OTHER	OTHER (NOT IMPROPER DRIVING)
13	IMP LN C	IMPROPER CHANGE OF TRAFFIC LANES
14	DIS TCD	DISREGARDED OTHER TRAFFIC CONTROL DEVICE
15	WRNG WAY	WRONG WAY ON ONE-WAY ROAD; WRONG SIDE DIVIDED RO
16	FATIGUE	DRIVER DROWSY/FATIGUED/SLEEPY
17	ILLNESS	PHYSICAL ILLNESS
18	IN RDWY	NON-MOTORIST ILLEGALLY IN ROADWAY
19	NT VISBL	NON-MOTORIST NOT VISIBLE; NON-REFLECTIVE CLOTHIN
20	IMP PKNG	VEHICLE IMPROPERLY PARKED
21	DEF STER	DEFECTIVE STEERING MECHANISM
22	DEF BRKE	INADEQUATE OR NO BRAKES
24	LOADSHFT	VEHICLE LOST LOAD OR LOAD SHIFTED
25	TIREFAIL	TIRE FAILURE
26	PHANTOM	PHANTOM / NON-CONTACT VEHICLE
27	INATTENT	INATTENTION
28	NM INATT	NON-MOTORIST INATTENTION
29	F AVOID	FAILED TO AVOID VEHICLE AHEAD
30	SPEED	DRIVING IN EXCESS OF POSTED SPEED
31	RACING	SPEED RACING (PER PAR)
32	CARELESS	CARELESS DRIVING (PER PAR)
33	RECKLESS	RECKLESS DRIVING (PER PAR)
34	AGGRESV	AGGRESSIVE DRIVING (PER PAR)
35	RD RAGE	ROAD RAGE (PER PAR)
40	VIEW OBS	VIEW OBSCURED
50	USED MDN	IMPROPER USE OF MEDIAN OR SHOULDER
51	FAIL LN	FAILED TO MAINTAIN LANE
52	OFF RD	RAN OFF ROAD

COLLISION TYPE CODE TRANSLATION LIST

COLL CODE	SHORT DESCRIPTION	LONG DESCRIPTION
&	OTH	MISCELLANEOUS
-	BACK	BACKING
0	PED	PEDESTRIAN
1	ANGL	ANGLE
2	HEAD	HEAD-ON
3	REAR	REAR-END
4	SS-M	SIDESWIPE - MEETING
5	SS-O	SIDESWIPE - OVERTAKING
6	TURN	TURNING MOVEMENT
7	PARK	PARKING MANEUVER
8	NCOL	NON-COLLISION
9	FIX	FIXED OBJECT OR OTHER OBJECT

CRASH TYPE CODE TRANSLATION LIST

CRASH TYPE	SHORT DESCRIPTION	LONG DESCRIPTION
&	OVERTURN	OVERTURNED
0	NON-COLL	OTHER NON-COLLISION
1	OTH RDWY	MOTOR VEHICLE ON OTHER ROADWAY
2	PRKD MV	PARKED MOTOR VEHICLE
3	PED	PEDESTRIAN
4	TRAIN	RAILWAY TRAIN
6	BIKE	PEDALCYCLIST
7	ANIMAL	ANIMAL
8	FIX OBJ	FIXED OBJECT
9	OTH OBJ	OTHER OBJECT
A	ANGL-STP	ENTERING AT ANGLE - ONE VEHICLE STOPPED
B	ANGL-OTH	ENTERING AT ANGLE - ALL OTHERS
C	S-STRGHT	FROM SAME DIRECTION - BOTH GOING STRAIGHT
D	S-1TURN	FROM SAME DIRECTION - ONE TURN, ONE STRAIGHT
E	S-1STOP	FROM SAME DIRECTION - ONE STOPPED
F	S-OTHER	FROM SAME DIRECTION-ALL OTHERS, INCLUDING PARKING
G	O-STRGHT	FROM OPPOSITE DIRECTION - BOTH GOING STRAIGHT
H	O-1 L-TURN	FROM OPPOSITE DIRECTION-ONE LEFT TURN, ONE STRAIGHT
I	O-1STOP	FROM OPPOSITE DIRECTION - ONE STOPPED
J	O-OTHER	FROM OPPOSITE DIRECTION-ALL OTHERS INCL. PARKING

DRIVER LICENSE CODE TRANSLATION LIST

LIC CODE	SHORT DESC	LONG DESCRIPTION
0	NONE	NOT LICENSED (HAD NEVER BEEN LICENSED)
1	OR-Y	VALID OREGON LICENSE
2	OTH-Y	VALID LICENSE, OTHER STATE OR COUNTRY
3	SUSP	SUSPENDED/REVOKED
4	EXP	EXPIRED
8	N-VAL	OTHER NON-VALID LICENSE
9	UNK	UNKNOWN IF DRIVER WAS LICENSED AT TIME OF CRASH

DRIVER RESIDENCE CODE TRANSLATION LIST

RES CODE	SHORT DESC	LONG DESCRIPTION
1	OR<25	OREGON RESIDENT WITHIN 25 MILE OF HOME
2	OR>25	OREGON RESIDENT 25 OR MORE MILES FROM HOME
3	OR-?	OREGON RESIDENT - UNKNOWN DISTANCE FROM HOME
4	N-RES	NON-RESIDENT
9	UNK	UNKNOWN IF OREGON RESIDENT

ERROR CODE TRANSLATION LIST

ERROR CODE	SHORT DESCRIPTION	FULL DESCRIPTION
000	NONE	NO ERROR
001	WIDE TRN	WIDE TURN
002	CUT CORN	CUT CORNER ON TURN
003	FAIL TRN	FAILED TO OBEY MANDATORY TRAFFIC TURN SIGNAL, SIGN OR LANE MARKINGS
004	L IN TRF	LEFT TURN IN FRONT OF ONCOMING TRAFFIC
005	L PROHIB	LEFT TURN WHERE PROHIBITED
006	FRM WRNG	TURNED FROM WRONG LANE
007	TO WRONG	TURNED INTO WRONG LANE
008	ILLEG U	U-TURNED ILLEGALLY
009	IMP STOP	IMPROPERLY STOPPED IN TRAFFIC LANE
010	IMP SIG	IMPROPER SIGNAL OR FAILURE TO SIGNAL
011	IMP BACK	BACKING IMPROPERLY (NOT PARKING)
012	IMP PARK	IMPROPERLY PARKED
013	UNPARK	IMPROPER START LEAVING PARKED POSITION
014	IMP STRT	IMPROPER START FROM STOPPED POSITION
015	IMP LGHT	IMPROPER OR NO LIGHTS (VEHICLE IN TRAFFIC)
016	INATTENT	INATTENTION (FAILURE TO DIM LIGHTS PRIOR TO 4/1/97)
017	UNSF VEH	DRIVING UNSAFE VEHICLE (NO OTHER ERROR APPARENT)
018	OTH PARK	ENTERING/EXITING PARKED POSITION W/ INSUFFICIENT CLEARANCE; OTHER IMPROPER PARKING MANEUVER
019	DIS DRIV	DISREGARDED OTHER DRIVER'S SIGNAL
020	DIS SGNL	DISREGARDED TRAFFIC SIGNAL
021	RAN STOP	DISREGARDED STOP SIGN OR FLASHING RED
022	DIS SIGN	DISREGARDED WARNING SIGN, FLARES OR FLASHING AMBER
023	DIS OFCR	DISREGARDED POLICE OFFICER OR FLAGMAN
024	DIS EMER	DISREGARDED SIREN OR WARNING OF EMERGENCY VEHICLE
025	DIS RR	DISREGARDED RR SIGNAL, RR SIGN, OR RR FLAGMAN
026	REAR-END	FAILED TO AVOID STOPPED OR PARKED VEHICLE AHEAD OTHER THAN SCHOOL BUS
027	BIKE ROW	DID NOT HAVE RIGHT-OF-WAY OVER PEDALCYCLIST
028	NO ROW	DID NOT HAVE RIGHT-OF-WAY
029	PED ROW	FAILED TO YIELD RIGHT-OF-WAY TO PEDESTRIAN
030	PAS CURV	PASSING ON A CURVE
031	PAS WRNG	PASSING ON THE WRONG SIDE
032	PAS TANG	PASSING ON STRAIGHT ROAD UNDER UNSAFE CONDITIONS
033	PAS X-WK	PASSED VEHICLE STOPPED AT CROSSWALK FOR PEDESTRIAN
034	PAS INTR	PASSING AT INTERSECTION
035	PAS HILL	PASSING ON CREST OF HILL
036	N/PAS ZN	PASSING IN "NO PASSING" ZONE
037	PAS TRAF	PASSING IN FRONT OF ONCOMING TRAFFIC
038	CUT-IN	CUTTING IN (TWO LANES - TWO WAY ONLY)
039	WRNGSIDE	DRIVING ON WRONG SIDE OF THE ROAD (2-WAY UNDIVIDED ROADWAYS)
040	THRU MED	DRIVING THROUGH SAFETY ZONE OR OVER ISLAND
041	F/ST BUS	FAILED TO STOP FOR SCHOOL BUS

ERROR CODE TRANSLATION LIST

ERROR CODE	SHORT DESCRIPTION	FULL DESCRIPTION
042	F/SLO MV	FAILED TO DECREASE SPEED FOR SLOWER MOVING VEHICLE
043	TOO CLOSE	FOLLOWING TOO CLOSELY (MUST BE ON OFFICER'S REPORT)
044	STRDL LN	STRADDLING OR DRIVING ON WRONG LANES
045	IMP CHG	IMPROPER CHANGE OF TRAFFIC LANES
046	WRNG WAY	WRONG WAY ON ONE-WAY ROADWAY; WRONG SIDE DIVIDED ROAD
047	BASCRULE	DRIVING TOO FAST FOR CONDITIONS (NOT EXCEEDING POSTED SPEED)
048	OPN DOOR	OPENED DOOR INTO ADJACENT TRAFFIC LANE
049	IMPEDING	IMPEDING TRAFFIC
050	SPEED	DRIVING IN EXCESS OF POSTED SPEED
051	RECKLESS	RECKLESS DRIVING (PER PAR)
052	CARELESS	CARELESS DRIVING (PER PAR)
053	RACING	SPEED RACING (PER PAR)
054	X N/SGNL	CROSSING AT INTERSECTION, NO TRAFFIC SIGNAL PRESENT
055	X W/SGNL	CROSSING AT INTERSECTION, TRAFFIC SIGNAL PRESENT
056	DIAGONAL	CROSSING AT INTERSECTION - DIAGONALLY
057	BTWN INT	CROSSING BETWEEN INTERSECTIONS
059	W/TRAF-S	WALKING, RUNNING, RIDING, ETC., ON SHOULDER WITH TRAFFIC
060	A/TRAF-S	WALKING, RUNNING, RIDING, ETC., ON SHOULDER FACING TRAFFIC
061	W/TRAF-P	WALKING, RUNNING, RIDING, ETC., ON PAVEMENT WITH TRAFFIC
062	A/TRAF-P	WALKING, RUNNING, RIDING, ETC., ON PAVEMENT FACING TRAFFIC
063	PLAYINRD	PLAYING IN STREET OR ROAD
064	PUSH MV	PUSHING OR WORKING ON VEHICLE IN ROAD OR ON SHOULDER
065	WORK IN RD	WORKING IN ROADWAY OR ALONG SHOULDER
070	LAY ON RD	STANDING OR LYING IN ROADWAY
071	NM IMP USE	IMPROPER USE OF TRAFFIC LANE BY NON-MOTORIST
073	ELUDING	ELUDING / ATTEMPT TO ELUDE
079	F NEG CURV	FAILED TO NEGOTIATE A CURVE
080	FAIL LN	FAILED TO MAINTAIN LANE
081	OFF RD	RAN OFF ROAD
082	NO CLEAR	DRIVER MISJUDGED CLEARANCE
083	OVRSTEER	OVER-CORRECTING
084	NOT USED	CODE NOT IN USE
085	OVRLOAD	OVERLOADING OR IMPROPER LOADING OF VEHICLE WITH CARGO OR PASSENGERS
097	UNA DIS TC	UNABLE TO DETERMINE WHICH DRIVER DISREGARDED TRAFFIC CONTROL DEVICE

EVENT CODE TRANSLATION LIST

EVENT CODE	SHORT DESCRIPTION	LONG DESCRIPTION
001	FEL/JUMP	OCCUPANT FELL, JUMPED OR WAS EJECTED FROM MOVING VEHICLE
002	INTERFER	PASSENGER INTERFERED WITH DRIVER
003	BUG INTF	ANIMAL OR INSECT IN VEHICLE INTERFERED WITH DRIVER
004	INDRCT PED	PEDESTRIAN INDIRECTLY INVOLVED (NOT STRUCK)
005	SUB-PED	"SUB-PED": PEDESTRIAN INJURED SUBSEQUENT TO COLLISION, ETC.
006	INDRCT BIK	PEDALCYCLIST INDIRECTLY INVOLVED (NOT STRUCK)
007	HITCHIKR	HITCHHIKER (SOLICITING A RIDE)
008	PSNGR TOW	PASSENGER OR NON-MOTORIST BEING TOWED OR PUSHED ON CONVEYANCE
009	ON/OFF V	GETTING ON/OFF STOPPED/PARKED VEHICLE (OCCUPANTS ONLY; MUST HAVE PHYSICAL CONTACT W/ VEHIC
010	SUB OTRN	OVERTURNED AFTER FIRST HARMFUL EVENT
011	MV PUSHD	VEHICLE BEING PUSHED
012	MV TOWED	VEHICLE TOWED OR HAD BEEN TOWING ANOTHER VEHICLE
013	FORCED	VEHICLE FORCED BY IMPACT INTO ANOTHER VEHICLE, PEDALCYCLIST OR PEDESTRIAN
014	SET MOTN	VEHICLE SET IN MOTION BY NON-DRIVER (CHILD RELEASED BRAKES, ETC.)
015	RR ROW	AT OR ON RAILROAD RIGHT-OF-WAY (NOT LIGHT RAIL)
016	LT RL ROW	AT OR ON LIGHT-RAIL RIGHT-OF-WAY
017	RR HIT V	TRAIN STRUCK VEHICLE
018	V HIT RR	VEHICLE STRUCK TRAIN
019	HIT RR CAR	VEHICLE STRUCK RAILROAD CAR ON ROADWAY
020	JACKKNIFE	JACKKNIFE; TRAILER OR TOWED VEHICLE STRUCK TOWING VEHICLE
021	TRL OTRN	TRAILER OR TOWED VEHICLE OVERTURNED
022	CN BROKE	TRAILER CONNECTION BROKE
023	DETACH TRL	DETACHED TRAILING OBJECT STRUCK OTHER VEHICLE, NON-MOTORIST, OR OBJECT
024	V DOOR OPN	VEHICLE DOOR OPENED INTO ADJACENT TRAFFIC LANE
025	WHEELOFF	WHEEL CAME OFF
026	HOOD UP	HOOD FLEW UP
028	LOAD SHIFT	LOST LOAD, LOAD MOVED OR SHIFTED
029	TIREFAIL	TIRE FAILURE
030	PET	PET: CAT, DOG AND SIMILAR
031	LVSTOCK	STOCK: COW, CALF, BULL, STEER, SHEEP, ETC.
032	HORSE	HORSE, MULE, OR DONKEY
033	HRSE&RID	HORSE AND RIDER
034	GAME	WILD ANIMAL, GAME (INCLUDES BIRDS; NOT DEER OR ELK)
035	DEER ELK	DEER OR ELK, WAPITI
036	ANML VEH	ANIMAL-DRAWN VEHICLE
037	CULVERT	CULVERT, OPEN LOW OR HIGH MANHOLE
038	ATENUATN	IMPACT ATTENUATOR
039	PK METER	PARKING METER
040	CURB	CURB (ALSO NARROW SIDEWALKS ON BRIDGES)
041	JIGGLE	JIGGLE BAR OR TRAFFIC SNAKE FOR CHANNELIZATION
042	GDRL END	LEADING EDGE OF GUARDRAIL
043	GARDRAIL	GUARD RAIL (NOT METAL MEDIAN BARRIER)
044	BARRIER	MEDIAN BARRIER (RAISED OR METAL)
045	WALL	RETAINING WALL OR TUNNEL WALL
046	BR RAIL	BRIDGE RAILING OR PARAPET (ON BRIDGE OR APPROACH)
047	BR ABUTMNT	BRIDGE ABUTMENT (INCLUDED "APPROACH END" THRU 2013)
048	BR COLMN	BRIDGE PILLAR OR COLUMN
049	BR GIRDR	BRIDGE GIRDER (HORIZONTAL BRIDGE STRUCTURE OVERHEAD)
050	ISLAND	TRAFFIC RAISED ISLAND
051	GORE	GORE
052	POLE UNK	POLE - TYPE UNKNOWN
053	POLE UTL	POLE - POWER OR TELEPHONE
054	ST LIGHT	POLE - STREET LIGHT ONLY
055	TRF SGNL	POLE - TRAFFIC SIGNAL AND PED SIGNAL ONLY
056	SGN BRDG	POLE - SIGN BRIDGE
057	STOPSIGN	STOP OR YIELD SIGN
058	OTH SIGN	OTHER SIGN, INCLUDING STREET SIGNS
059	HYDRANT	HYDRANT

EVENT CODE TRANSLATION LIST

EVENT CODE	SHORT DESCRIPTION	LONG DESCRIPTION
060	MARKER	DELINEATOR OR MARKER (REFLECTOR POSTS)
061	MAILBOX	MAILBOX
062	TREE	TREE, STUMP OR SHRUBS
063	VEG OHED	TREE BRANCH OR OTHER VEGETATION OVERHEAD, ETC.
064	WIRE/CBL	WIRE OR CABLE ACROSS OR OVER THE ROAD
065	TEMP SGN	TEMPORARY SIGN OR BARRICADE IN ROAD, ETC.
066	PERM SGN	PERMANENT SIGN OR BARRICADE IN/OFF ROAD
067	SLIDE	SLIDES, FALLEN OR FALLING ROCKS
068	FRGN OBJ	FOREIGN OBSTRUCTION/DEBRIS IN ROAD (NOT GRAVEL)
069	EQP WORK	EQUIPMENT WORKING IN/OFF ROAD
070	OTH EQP	OTHER EQUIPMENT IN OR OFF ROAD (INCLUDES PARKED TRAILER, BOAT)
071	MAIN EQP	WRECKER, STREET SWEEPER, SNOW PLOW OR SANDING EQUIPMENT
072	OTHER WALL	ROCK, BRICK OR OTHER SOLID WALL
073	IRRGL PVMT	OTHER BUMP (NOT SPEED BUMP), POTHOLE OR PAVEMENT IRREGULARITY (PER PAR)
074	OVERHD OBJ	OTHER OVERHEAD OBJECT (HIGHWAY SIGN, SIGNAL HEAD, ETC.); NOT BRIDGE
075	CAVE IN	BRIDGE OR ROAD CAVE IN
076	HI WATER	HIGH WATER
077	SNO BANK	SNOW BANK
078	LO-HI EDGE	LOW OR HIGH SHOULDER AT PAVEMENT EDGE
079	DITCH	CUT SLOPE OR DITCH EMBANKMENT
080	OBJ FRM MV	STRUCK BY ROCK OR OTHER OBJECT SET IN MOTION BY OTHER VEHICLE (INCL. LOST LOADS)
081	FLY-OBJ	STRUCK BY ROCK OR OTHER MOVING OR FLYING OBJECT (NOT SET IN MOTION BY VEHICLE)
082	VEH HID	VEHICLE OBSCURED VIEW
083	VEG HID	VEGETATION OBSCURED VIEW
084	BLDG HID	VIEW OBSCURED BY FENCE, SIGN, PHONE BOOTH, ETC.
085	WIND GUST	WIND GUST
086	IMMERSED	VEHICLE IMMERSED IN BODY OF WATER
087	FIRE/EXP	FIRE OR EXPLOSION
088	FENC/BLD	FENCE OR BUILDING, ETC.
089	OTHR CRASH	CRASH RELATED TO ANOTHER SEPARATE CRASH
090	TO 1 SIDE	TWO-WAY TRAFFIC ON DIVIDED ROADWAY ALL ROUTED TO ONE SIDE
091	BUILDING	BUILDING OR OTHER STRUCTURE
092	PHANTOM	OTHER (PHANTOM) NON-CONTACT VEHICLE
093	CELL PHONE	CELL PHONE (ON PAR OR DRIVER IN USE)
094	VIOL GDL	TEENAGE DRIVER IN VIOLATION OF GRADUATED LICENSE PGM
095	GUY WIRE	GUY WIRE
096	BERM	BERM (EARTHEN OR GRAVEL MOUND)
097	GRAVEL	GRAVEL IN ROADWAY
098	ABR EDGE	ABRUPT EDGE
099	CELL WTNSD	CELL PHONE USE WITNESSED BY OTHER PARTICIPANT
100	UNK FIXD	FIXED OBJECT, UNKNOWN TYPE.
101	OTHER OBJ	NON-FIXED OBJECT, OTHER OR UNKNOWN TYPE
102	TEXTING	TEXTING
103	WZ WORKER	WORK ZONE WORKER
104	ON VEHICLE	PASSENGER RIDING ON VEHICLE EXTERIOR
105	PEDAL PSGR	PASSENGER RIDING ON PEDALCYCLE
106	MAN WHLCHR	PEDESTRIAN IN NON-MOTORIZED WHEELCHAIR
107	MTR WHLCHR	PEDESTRIAN IN MOTORIZED WHEELCHAIR
108	OFFICER	LAW ENFORCEMENT / POLICE OFFICER
109	SUB-BIKE	"SUB-BIKE": PEDALCYCLIST INJURED SUBSEQUENT TO COLLISION, ETC.
110	N-MTR	NON-MOTORIST STRUCK VEHICLE
111	S CAR VS V	STREET CAR/TROLLEY (ON RAILS OR OVERHEAD WIRE SYSTEM) STRUCK VEHICLE
112	V VS S CAR	VEHICLE STRUCK STREET CAR/TROLLEY (ON RAILS OR OVERHEAD WIRE SYSTEM)
113	S CAR ROW	AT OR ON STREET CAR OR TROLLEY RIGHT-OF-WAY
114	RR EQUIP	VEHICLE STRUCK RAILROAD EQUIPMENT (NOT TRAIN) ON TRACKS
115	DSTRCT GPS	DISTRACTED BY NAVIGATION SYSTEM OR GPS DEVICE
116	DSTRCT OTH	DISTRACTED BY OTHER ELECTRONIC DEVICE
117	RR GATE	RAIL CROSSING DROP-ARM GATE

EVENT CODE TRANSLATION LIST

EVENT CODE	SHORT DESCRIPTION	LONG DESCRIPTION
118	EXPNSN JNT	EXPANSION JOINT
119	JERSEY BAR	JERSEY BARRIER
120	WIRE BAR	WIRE OR CABLE MEDIAN BARRIER
121	FENCE	FENCE
123	OBJ IN VEH	LOOSE OBJECT IN VEHICLE STRUCK OCCUPANT
124	SLIPPERY	SLIDING OR SWERVING DUE TO WET, ICY, SLIPPERY OR LOOSE SURFACE (NOT GRAVEL)
125	SHLDR	SHOULDER GAVE WAY
126	BOULDER	ROCK(S), BOULDER (NOT GRAVEL; NOT ROCK SLIDE)
127	LAND SLIDE	ROCK SLIDE OR LAND SLIDE
128	CURVE INV	CURVE PRESENT AT CRASH LOCATION
129	HILL INV	VERTICAL GRADE / HILL PRESENT AT CRASH LOCATION
130	CURVE HID	VIEW OBSCURED BY CURVE
131	HILL HID	VIEW OBSCURED BY VERTICAL GRADE / HILL
132	WINDOW HID	VIEW OBSCURED BY VEHICLE WINDOW CONDITIONS
133	SPRAY HID	VIEW OBSCURED BY WATER SPRAY
134	TORRENTIAL	TORRENTIAL RAIN (EXCEPTIONALLY HEAVY RAIN)

FUNCTIONAL CLASSIFICATION TRANSLATION LIST

FUNC CLASS	DESCRIPTION
01	RURAL PRINCIPAL ARTERIAL - INTERSTATE
02	RURAL PRINCIPAL ARTERIAL - OTHER
06	RURAL MINOR ARTERIAL
07	RURAL MAJOR COLLECTOR
08	RURAL MINOR COLLECTOR
09	RURAL LOCAL
11	URBAN PRINCIPAL ARTERIAL - INTERSTATE
12	URBAN PRINCIPAL ARTERIAL - OTHER FREEWAYS AND EXP
14	URBAN PRINCIPAL ARTERIAL - OTHER
16	URBAN MINOR ARTERIAL
17	URBAN MAJOR COLLECTOR
18	URBAN MINOR COLLECTOR
19	URBAN LOCAL
78	UNKNOWN RURAL SYSTEM
79	UNKNOWN RURAL NON-SYSTEM
98	UNKNOWN URBAN SYSTEM
99	UNKNOWN URBAN NON-SYSTEM

HIGHWAY COMPONENT TRANSLATION LIST

CODE	DESCRIPTION
0	MAINLINE STATE HIGHWAY
1	COUPLET
3	FRONTAGE ROAD
6	CONNECTION
8	HIGHWAY - OTHER

INJURY SEVERITY CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
1	KILL	FATAL INJURY
2	INJA	INCAPACITATING INJURY - BLEEDING, BROKEN BONES
3	INJB	NON-INCAPACITATING INJURY
4	INJC	POSSIBLE INJURY - COMPLAINT OF PAIN
5	PRI	DIED PRIOR TO CRASH
7	NO<5	NO INJURY - 0 TO 4 YEARS OF AGE
9	NONE	PARTICIPANT UNINJURED, OVER THE AGE OF 4

LIGHT CONDITION CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
0	UNK	UNKNOWN
1	DAY	DAYLIGHT
2	DLIT	DARKNESS - WITH STREET LIGHTS
3	DARK	DARKNESS - NO STREET LIGHTS
4	DAWN	DAWN (TWILIGHT)
5	DUSK	DUSK (TWILIGHT)

MEDIAN TYPE CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
0	NONE	NO MEDIAN
1	RSDMD	SOLID MEDIAN BARRIER
2	DIVMD	EARTH, GRASS OR PAVED MEDIAN

MILEAGE TYPE CODE TRANSLATION LIST

CODE	LONG DESCRIPTION
0	REGULAR MILEAGE
T	TEMPORARY
Y	SPUR
Z	OVERLAPPING

MOVEMENT TYPE CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
0	UNK	UNKNOWN
1	STRGHT	STRAIGHT AHEAD
2	TURN-R	TURNING RIGHT
3	TURN-L	TURNING LEFT
4	U-TURN	MAKING A U-TURN
5	BACK	BACKING
6	STOP	STOPPED IN TRAFFIC
7	PRKD-P	PARKED - PROPERLY
8	PRKD-I	PARKED - IMPROPERLY
9	PARKNG	PARKING MANEUVER

PARTICIPANT TYPE CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
0	OCC	UNKNOWN OCCUPANT TYPE
1	DRVR	DRIVER
2	PSNG	PASSENGER
3	PED	PEDESTRIAN
4	CONV	PEDESTRIAN USING A PEDESTRIAN CONVEYANCE
5	PTOW	PEDESTRIAN TOWING OR TRAILERING AN OBJECT
6	BIKE	PEDALCYCLIST
7	BTOW	PEDALCYCLIST TOWING OR TRAILERING AN OBJECT
8	PRKD	OCCUPANT OF A PARKED MOTOR VEHICLE
9	UNK	UNKNOWN TYPE OF NON-MOTORIST

TRAFFIC CONTROL DEVICE CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
000	NONE	NO CONTROL
001	TRF SIGNAL	TRAFFIC SIGNALS
002	FLASHBCN-R	FLASHING BEACON - RED (STOP)
003	FLASHBCN-A	FLASHING BEACON - AMBER (SLOW)
004	STOP SIGN	STOP SIGN
005	SLOW SIGN	SLOW SIGN
006	REG-SIGN	REGULATORY SIGN
007	YIELD	YIELD SIGN
008	WARNING	WARNING SIGN
009	CURVE	CURVE SIGN
010	SCHL X-ING	SCHOOL CROSSING SIGN OR SPECIAL SIGNAL
011	OFPCR/FLAG	POLICE OFFICER, FLAGMAN - SCHOOL PATROL
012	BRDG-GATE	BRIDGE GATE - BARRIER
013	TEMP-BARR	TEMPORARY BARRIER
014	NO-PASS-ZN	NO PASSING ZONE
015	ONE-WAY	ONE-WAY STREET
016	CHANNEL	CHANNELIZATION
017	MEDIAN BAR	MEDIAN BARRIER
018	PILOT CAR	PILOT CAR
019	SP PED SIG	SPECIAL PEDESTRIAN SIGNAL
020	X-BUCK	CROSSBUCK
021	THR-GN-SIG	THROUGH GREEN ARROW OR SIGNAL
022	L-GRN-SIG	LEFT TURN GREEN ARROW, LANE MARKINGS, OR SIGNAL
023	R-GRN-SIG	RIGHT TURN GREEN ARROW, LANE MARKINGS, OR SIGNAL
024	WIGWAG	WIGWAG OR FLASHING LIGHTS W/O DROP-ARM GATE
025	X-BUCK WRN	CROSSBUCK AND ADVANCE WARNING
026	WW W/ GATE	FLASHING LIGHTS WITH DROP-ARM GATES
027	OVRHD SGNL	SUPPLEMENTAL OVERHEAD SIGNAL (RR XING ONLY)
028	SP RR STOP	SPECIAL RR STOP SIGN
029	ILUM GRD X	ILLUMINATED GRADE CROSSING
037	RAMP METER	METERED RAMPS
038	RUMBLE STR	RUMBLE STRIP
090	L-TURN REF	LEFT TURN REFUGE (WHEN REFUGE IS INVOLVED)
091	R-TURN ALL	RIGHT TURN AT ALL TIMES SIGN, ETC.
092	EMR SGN/FL	EMERGENCY SIGNS OR FLARES
093	ACCEL LANE	ACCELERATION OR DECELERATION LANES
094	R-TURN PRO	RIGHT TURN PROHIBITED ON RED AFTER STOPPING
095	BUS STPSGN	BUS STOP SIGN AND RED LIGHTS
099	UNKNOWN	UNKNOWN OR NOT DEFINITE

NON-MOTORIST LOCATION CODE TRANSLATION LIST

CODE	LONG DESCRIPTION
00	AT INTERSECTION - NOT IN ROADWAY
01	AT INTERSECTION - INSIDE CROSSWALK
02	AT INTERSECTION - IN ROADWAY, OUTSIDE CROSSWALK
03	AT INTERSECTION - IN ROADWAY, XWALK AVAIL UNKNWN
04	NOT AT INTERSECTION - IN ROADWAY
05	NOT AT INTERSECTION - ON SHOULDER
06	NOT AT INTERSECTION - ON MEDIAN
07	NOT AT INTERSECTION - WITHIN TRAFFIC RIGHT-OF-WAY
08	NOT AT INTERSECTION - IN BIKE PATH OR PARKING LANE
09	NOT-AT INTERSECTION - ON SIDEWALK
10	OUTSIDE TRAFFICWAY BOUNDARIES
13	AT INTERSECTION - IN BIKE LANE
14	NOT AT INTERSECTION - IN BIKE LANE
15	NOT AT INTERSECTION - INSIDE MID-BLOCK CROSSWALK
16	NOT AT INTERSECTION - IN PARKING LANE
18	OTHER, NOT IN ROADWAY
99	UNKNOWN LOCATION

ROAD CHARACTER CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
0	UNK	UNKNOWN
1	INTER	INTERSECTION
2	ALLEY	DRIVEWAY OR ALLEY
3	STRGHT	STRAIGHT ROADWAY
4	TRANS	TRANSITION
5	CURVE	CURVE (HORIZONTAL CURVE)
6	OPENAC	OPEN ACCESS OR TURNOUT
	GRADE	GRADE (VERTICAL CURVE)
	BRIDGE	BRIDGE STRUCTURE
	TUNNEL	TUNNEL

VEHICLE TYPE CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
00	PDO	NOT COLLECTED FOR PDO CRASHES
01	PSNGR CAR	PASSENGER CAR, PICKUP, LIGHT DELIVERY, ETC.
02	BOBTAIL	TRUCK TRACTOR WITH NO TRAILERS (BOBTAIL)
03	FARM TRCTR	FARM TRACTOR OR SELF-PROPELLED FARM EQUIPMENT
04	SEMI TOW	TRUCK TRACTOR WITH TRAILER/MOBILE HOME IN TOW
05	TRUCK	TRUCK WITH NON-DETACHABLE BED, PANEL, ETC.
06	MOPED	MOPED, MINIBIKE, SEATED MOTOR SCOOTER, MOTOR BIKE
07	SCHL BUS	SCHOOL BUS (INCLUDES VAN)
08	OTH BUS	OTHER BUS
09	MTRCYCLE	MOTORCYCLE, DIRT BIKE
10	OTHER	OTHER: FORKLIFT, BACKHOE, ETC.
11	MOTRHOME	MOTORHOME
12	TROLLEY	MOTORIZED STREET CAR/TROLLEY (NO RAILS/WIRES)
13	ATV	ATV
14	MTRSCTR	MOTORIZED SCOOTER (STANDING)
15	SNOWMOBILE	SNOWMOBILE
99	UNKNOWN	UNKNOWN VEHICLE TYPE

WEATHER CONDITION CODE TRANSLATION LIST

CODE	SHORT DESC	LONG DESCRIPTION
0	UNK	UNKNOWN
1	CLR	CLEAR
2	CLD	CLOUDY
3	RAIN	RAIN
4	SLT	SLEET
5	FOG	FOG
6	SNOW	SNOW
7	DUST	DUST
8	SMOK	SMOKE
9	ASH	ASH



Oregon Department of Transportation

Region

2022 - On-State, All SPIS Sites - By Hwy, MP

5

Rte	Rdwy	BMP	EMP	ADT	Crash	Fatal	A	B	C	City	County	Connection	Percent	SPIS
008 Oregon-Washington														
OR-11	1	33.39	33.48	12,645	1	0	1	0	0		Umatilla		35	20.96
OR-11	1	33.40	33.49	12,645	1	0	1	0	0		Umatilla		35	20.96
OR-11	1	33.41	33.50	12,645	1	0	1	0	0		Umatilla		35	20.96
OR-11	1	33.42	33.51	12,645	1	0	1	0	0		Umatilla		35	20.96
OR-11	1	33.43	33.52	12,645	1	0	1	0	0		Umatilla		35	20.96
OR-11	1	33.44	33.53	12,645	5	0	3	0	2		Umatilla	CROCKETT RD.	95	62.63
OR-11	1	33.45	33.54	12,645	4	0	2	0	2		Umatilla	CROCKETT RD.	90	47.74
OR-11	1	33.46	33.55	12,645	4	0	2	0	2		Umatilla	CROCKETT RD.	90	47.74
OR-11	1	33.47	33.56	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.48	33.57	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.49	33.58	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.50	33.59	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.51	33.60	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.52	33.61	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.53	33.62	12,645	6	0	2	1	3		Umatilla	CROCKETT RD.	90	54.02
OR-11	1	33.62	33.71	12,645	3	0	0	2	1		Umatilla		10	14.27

DRAFT MINUTES

**COMPREHENSIVE PLAN MAP AMENDMENT
P-137-24, and ZONE MAP AMENDMENT Z-324-
24:**

**HAAK HOLDINGS, LLC
APPLICANT/OWNER**

The applicant requests to change the Comprehensive Plan designation from Rural Residential to Commercial and change the Zoning Map from Rural Residential – 4 Acre Minimum Parcel Size (RR-4) to Rural Retail Service Commercial (RRSC). The subject property is located on the west side of State Highway 11, approximately 1.5 miles north of the Milton-Freewater city limits. The situs address is 84722 Highway 11, Milton-Freewater, OR 97862. The site is identified on assessor’s map as Township 6 North, Range 35 East, Section 25B, Tax Lot 1900. The subject property is approximately 1.97 acres. The criteria of approval are found in Oregon Revised Statute ORS 197.195, Oregon Administrative Rule Chapter 660, Divisions 12 & 15, and Umatilla County Development Code (UCDC) Section 152.750 – 755 and UCDC Section 152.251.

**UMATILLA COUNTY
PLANNING COMMISSION HEARING
October 24, 2024**

DRAFT MINUTES
UMATILLA COUNTY PLANNING COMMISSION
Meeting of Thursday, October 24, 2024, 6:30pm

COMMISSIONERS

PRESENT: Suni Danforth, Chair, Sam Tucker, Vice Chair, John Standley, Emery Gentry and Andrew Morris

COMMISSIONER

PRESENT VIA ZOOM: Kim Gillet, Ann Minton and Malcolm Millar

COMMISSIONERS

ABSENT: Tami Green

PLANNING STAFF:

Robert Waldher, Community Development Director, and Shawna Van Sickle, Administrative Assistant

NOTE: THE FOLLOWING IS A SUMMARY OF THE MEETING. RECORDING IS AVAILABLE AT THE PLANNING OFFICE.

CALL TO ORDER

Chair Danforth called the meeting to order at 6:32PM and read the Opening Statement.

MINUTES

Chair Danforth called for any corrections or additions to the July 25, 2024 & September 26, 2024 meeting minutes. No additions nor corrections were noted.

Commissioner Standley moved to approve the draft minutes from the July 25, 2024 meeting minutes, as presented. Commissioner Gentry seconded the motion. Motion carried by consensus.

Commissioner Standley moved to approve the draft minutes from the September 26, 2024 meeting minutes, as presented. Commissioner Gentry seconded the motion. Motion carried by consensus.

NEW HEARING

COMPREHENSIVE PLAN MAP AMENDMENT P-137-24, and ZONE MAP AMENDMENT Z-324-24: HAAK HOLDINGS, LLC, APPLICANT & OWNER: The applicant requests to change the Comprehensive Plan designation from Rural Residential to Commercial and change the Zoning Map from Rural Residential – 4 Acre Minimum Parcel Size (RR-4) to Rural Retail Service Commercial (RRSC). The subject property is located on the west side of State Highway 11, approximately 1.5 miles north of the Milton-Freewater city limits. The situs address is 84722 Highway 11, Milton-Freewater, OR 97862. The site is identified on assessor’s map as Township 6 North, Range 35 East, Section 25B, Tax Lot 1900. The subject

property is approximately 1.97 acres. The criteria of approval are found in Oregon Revised Statute ORS 197.195, Oregon Administrative Rule Chapter 660, Divisions 12 & 15, and Umatilla County Development Code (UCDC) Section 152.750 – 755 and UCDC Section 152.251.

Chair Danforth called for any abstentions, bias, conflicts of interest, declarations of ex parte contact or objections to jurisdiction. No other reports were made.

Chair Danforth called for the Staff Report.

STAFF REPORT

Mr. Robert Waldher, Community Development Director, introduced himself and the application before the Planning Commission that evening. He stated the applicant/owner, HAAK Holdings, LLC, has requested to change the Comprehensive Plan designation from Rural Residential to Commercial and change the Zoning Map from Rural Residential, 4-acre minimum Parcel Size (RR-4) to Rural Retail Service Commercial (RRSC). The subject property is located on the west side of State Highway 11, approximately 1.5 miles north of the Milton-Freewater city limits. The situs address is 84722 Highway 11, Milton-Freewater, OR 97862. He added, the site is identified on assessor's map as Township 6 North, Range 35 East, Section 25B, Tax Lot 1900. The subject property is approximately 1.97 acres. He stated the packet includes a vicinity map of the subject property marked as Exhibit A and a map showing the existing and proposed zoning of the subject property marked as Exhibit B.

Mr. Waldher explained that Umatilla County records showed the applicant/owner purchased the subject property in February 2022. Umatilla County Code Enforcement issued a 30-day warning to the owners of the subject property on June 15, 2022. He expressed that the warning was for the unpermitted operation of a business in the RR-4 zone. Subsequent to the warning, planning staff contacted the property owners to discuss property rezoning to help correct the violation. He stated, a second warning was issued to the owners of the subject property on July 12, 2023 due to continued operation of the business without land use approval. Planning staff again contacted the property owners to prompt them to prepare a plan amendment to correct the violation. He stated the subject property continues to be used by the applicant (in violation of the Umatilla County Development Code) to store RV's, trailers and campers in support of the applicant's business operations, Click-it RV.

Mr. Waldher added that an application for a Comprehensive Plan Map Amendment and Zoning Map Amendment was submitted to Umatilla County Community Development Department on June 12, 2024. In accordance with requirements of the Umatilla County Development Code and Oregon Transportation Planning Rule, the applicant has also submitted a Traffic Impact Analysis which is attached as Exhibit C. Staff have prepared Findings. The criteria of approval can be found in Oregon Revised Statute ORS 197.195, Oregon Administrative Rule Chapter 660, Divisions 12 & 15, and Umatilla County Development Code (UCDC) Section 152.750 – 755 and UCDC Section 152.251.

Mr. Waldher stated, a 35-day Plan Amendment Notice was provided to the Department of Land Conservation and Development (DLCD) on September 19, 2024. Notice of the public hearings were mailed on October 4, 2024 to the owners of properties located within 250-feet of the perimeter of Tax Lot 1900. He added that additional notice was published in the East Oregonian on October 12, 2024 notifying the public of the applicant's request before the Planning Commission on October 24, 2024 and the Board of Commissioners on November 26, 2024.

He concluded that the Planning Commission are tasked with making a recommendation to the Umatilla County Board of Commissioners whether or not to approve or deny the proposed Comprehensive Plan Map Amendment and Zoning Map Amendment. The recommendation of the Planning Commission will be presented in a public hearing to the Board of Commissioners.

Commissioner Morris asked about the date of the Development Code and why it has not been updated for 50 years. Mr. Waldher stated the UCDC is considered a living document. The original adopted document was recognized by the state and has had many changes over the years in land use and local decisions amending from the original adoption date. He stated this includes changes in the comprehensive plan as well.

Chair Danforth referenced page 18, Goal 9 Economic Development, "...by allowing the currently undeveloped and unused property be put to a more productive use through the continuation and expansion of the Applicant's existing RV sales and service facility use." She added that was conflicting because the property is developed as residential. Mr. Waldher stated her assessment was accurate because the property is indeed developed with a dwelling on it. He added that previous owners of the property had filed for a replacement permit to place the manufactured home and stated the applicant should be able to speak to that question. Chair Danforth stated she felt like the misstatement should be addressed in the findings.

Chair Danforth brought up page 41, Site Access within Exhibit C. She asked Mr. Waldher about this section which stated, "It is anticipated the (future) applicant will construct any necessary frontage improvements at the time of development (as part of a future, specific development land use application)." Mr. Waldher stated the application before the Planning Commission is to rezone the property and if successful the applicants would then have to file a subsequent application for a Conditional Use permit to establish the RV Sales business on this property. He explained at that point the Planning Department would require the owners to demonstrate they got the access permits from Oregon Department of Transportation (ODOT) and that access was approved for that location. Mr. Waldher stated the applicants could have reworded that statement to address their future goals for the property.

Chair Danforth asked if the questions regarding the home have been addressed if this is approved and what that would look like in the next step of the process. She asked if she was correct in assuming this would be something that would be addressed after this application were to go through. Mr. Waldher confirmed that was accurate and it was something that was raised by Staff

to the applicant. He explained if this rezone application was approved and the dwelling still exists we don't want to create a situation where there is a non-conforming use and we want to confirm what the applicant intends to do.

Commissioner Tucker asked if the Planning Commission were to approve this and recommend approval to the Board of County Commissioners would there a non-conforming use unless the applicant voluntarily decided to remove the dwelling. Mr. Waldher stated there could be a situation where this were to be approved to rezone and potentially not move forward with the conditional use permit, it could force a situation where there was a non-conforming use. Commissioner Tucker asked if we wanted to protect against that by adding a condition to the approval. Mr. Waldher stated he didn't have any conditions written in the sample motions or recommendations, but it could be a condition placed on the approval.

Applicant Testimony: Mr. Garrett Stephenson, Counsel for the Applicant, 1211 SW 5th Ave. Ste. 1900, Portland, OR 97204; Mr. Kevin Smith, Sales Manager Click-It RV, 53816 W Crockett Rd, Milton Freewater, OR 97862; Mr. Stephenson started by explaining some history of when the properties were purchased. The buyers were under the assumption that both lots were commercial and could be used for RV sales. It wasn't until notified by Code Enforcement there was a development issue and they were operating a business on a residential property on this particular tax lot. He stated when he was brought on to the case he contacted the Planning Department, stated they wanted to comply and asked how they could remedy the situation. It was determined that a Plan Amendment would be most appropriate.

Mr. Stephenson stated there are many advantages for the conversion to a commercial zoned property. The first was from a traffic and planning standpoint. Their goal is to reduce the number of access points from US Highway 11 down to one between the two properties. He added, they also looked at the compatibility with surrounding farm uses. According to Land Use, commercial businesses like theirs, do not produce emissions or disruption to farming. Vehicles are actually a better fit next to farmland than individual homes due to normal farm practices and inconvenience to rural neighborhoods. He stated, this compatibility is advantageous to both the business holder and farmer. As far as the County's inventory of Goal 9 versus Goal 10 lands, their conclusion shows better balance and positive impact on the Economic development goal, which is Goal 9 versus a very, very minor adverse impact on Goal 10, which is the housing goal. He explained that the reason for that is it's a 2-acre site, and it can only have one home. He stated these analyses are pretty well explained in the staff report and shows all the criteria had been met and asked the Planning Commission to approve the application.

Mr. Stephenson explained a few questions brought forth by Chair Danforth and Commissioner Standley. He stated there is no one living on the property currently. There is a manufactured home presently, but the intent is to either convert it into a sales office or to remove it entirely and replace with a new sales office. He reiterated, there would not be a non-conforming use on the property moving forward.

Mr. Stephenson stated another advantage is their potential access consolidation. He stated currently, the sales lot is located on a separate tax lot much further north, which they lease, and service occurs on the tax lot 1902, and tax lot 1900 serves for some storage of RVs. He added, their goal would be to consolidate all operations to one-site along Highway 11. They would use service on one tax lot and sales on the other making things a lot easier for Click-It RV. He expressed this would reduce trips between the sales and service locations that is also good for safety along Highway 11.

Chair Danforth stated she was aware of the sales lot to the further north location and asked if the goal would be to cease operation on the other lot with their plan to consolidate usage onto these two tax lots. Mr. Stephenson stated, yes, they can not only solve the zoning violation but can consolidate the business into these two parcels.

Mr. Kevin Smith stated the current set up causes a lot of confusion to customers and the cross traffic. He stated he hopes this will create a more seamless experience for customers and their facility operations. He added that there is a huge need for service, providing parts and sales of RV's, which has led to the growth of their operations. He stated that when they grew into the residential property, unbeknownst to them at the time was residential, they didn't know there was an issue until alerted by Code Enforcement.

Chair Danforth asked if they could explain their plan to reduce ingress and egress to the property and how that would be accomplished. She also added, on page 12 under Compatibility and Surrounding Land Use, it mentions the signalized intersection at Crockett Road and Highway 11. She stated she wanted to correct that for the record since this intersection does not have a signal. Mr. Stephenson agreed, he was aware this is no signal at this intersection and was not sure why the findings indicate that. He stated the reduction of traffic comes because they won't need to have the RV's towed onto Highway 11 from the two different sites. He stated there would now only be one access off of Highway 11, and one access to the north from Crockett Road.

Commissioner Gentry asked if they had approached the subject with ODOT yet or filed for permits. Mr. Stephenson stated ODOT received notice of this application and provided no comment. He stated, personally his dealings with ODOT, they like the reduction of access points on the highways so he didn't think there would be an issue. He reiterated the goal was to get the zoning change complete before moving forward with ODOT access permits once their operations are consistent with the Development Codes standards.

Commissioner Tucker had some questions about the flow of the property once the consolidation of the access points is complete and service and sales exist side by side. Mr. Smith demonstrated on-screen. He stated they would like to keep the centralized access point and allow it to funnel customers to one tax lot for service or the other for sales.

Commissioner Tucker asked how they intend to fit all of the RV's onto the property. Mr. Smith stated the shape of the property is much better accommodating to their needs and would allow for them to utilize the land to position their inventory.

Chair Danforth asked why it has taken them two years to get the application submitted and moving forward and why Click-It RV didn't do their due diligence with zoning before purchasing the properties. Mr. Stephenson stated they have been working solidly for at least a year to try to resolve the code violation. He expressed they have handled this situation like they would any other, with voluntary compliance approach. He stated the Planning and Code Enforcement team had asked them to meet benchmarks along this timeframe and they have been working towards them. He stated it took some time to gather the right materials and address the information necessary, including enlisting a traffic engineer whilst preparing the application. He also noted that this application was also not subject to the 120-day deadline or it may had been seen before the Planning Commissioner sooner.

Opponents: None

Public Agencies: None

Rebuttal Testimony: Mr. Garrett Stephenson, Counsel for the Applicant, 1211 SW 5th Ave. Ste. 1900, Portland, OR 97204; Mr. Kevin Smith, Sales Manager Click-It RV, 53816 W Crockett Rd, Milton Freewater, OR 97862; Mr. Stephenson stated he wanted to thank Bob and his team for helping them get to this point and the time of the Planning Commission for reviewing the materials. He added, the County Planning Department concluded they met all the applicable criteria and, on that basis, asked the Planning Commission to approve the application and do so without conditions of approval because it is a Plan Amendment and Zone change. He stated, if a condition of approval were imposed it would sit with the property forever, no matter how it is developed. He explained he feels if any condition were imposed it would be more specifically relevant to the use they would be conducting on site.

Commissioner Tucker stated the only risk would be in they never seek out a conditional use permit and someone decides to live in the manufactured home or they never convert the structure from residential use. Mr. Stephenson reiterated the risk was extraordinarily remote given the ownership and stated he thinks Mr. Waldher would agree, from a planning standpoint, they don't like to impose conditions on zone changes.

Mr. Smith stated as an operator for a business, logistically it makes more sense to operate within the same property. He added that they struggle at two different locations. The zone change would allow for them to operate the business simultaneously side-by-side.

Commissioner Gentry stated, in their position, whatever can be done to make this area more commercialized zone is the direction this community needs to head. He added, the reduction of limited access points could also help mitigate the cross traffic along the highway.

Chair Danforth called for any requests for the hearing to be continued, or for the record to remain open. There were none.

Chair Danforth closed the hearing for deliberation.

Questions were briefly exchanged between the in-person Planning Commissioners regarding if the property would be out of compliance if the owners used the manufactured home for residential purposes and it remains non-conforming if it is never converted.

Mr. Stephenson asked to reopen the record, so he could help answer their question.

Chair Danforth reopened the record for Mr. Stephenson to explain about the non-conforming use questions posed by the Planning Commissioners.

Mr. Stephenson stated if this were to move from rural residential to rural commercial, which is the type of zone they are requesting to move in to, there would not be an existing non-conforming use. He explained, unless the property were sold, and the house were occupied by another person, there would not be a non-conforming use. He stated there is a 100% intent to put a new sales office there, but simply having that non-conforming structure there does not make it a non-conforming use. It's a non-conforming structure in the sense that it is a residential structure on a commercial lot, but nobody's living in it.

Chair Danforth asked what if they wanted to use it for security years later. Mr. Stephenson stated the zone does allow for a caretaker dwelling. Mr. Waldher confirmed that is an allowed use for the zoning but would be accomplished through a conditional use application as a temporary caretaker dwelling.

Mr. Stephenson concluded stating, as a former planner himself, the profitability and marketable nature of this property favors commercial use far more than it would under residential use. He stated, it would have more value because it can be used for commercial use.

Chair Danforth again closed the hearing for deliberation.

DELIBERATION & DECISION

Commissioner Tucker stated he understood the small risk still exists, but he was comfortable with approving this application without conditions of approval. He stated benefits were seen with the traffic impact analysis, enhancing the business operation itself, and reducing transportation access points.

Commissioner Standley made a motion to recommend approval of Plan Map Amendment P-137-24 and Zoning Map Amendment Z-324-24, to the Board of County Commissioners based on foregoing Findings of Fact and Conclusions of Law.

Commissioner Gentry seconded the motion. Motion carried with a vote of 8:0.

OTHER BUSINESS

Mr. Waldher stated there is no new upcoming business for the Planning Commissioner. He did hand out letters to the Planning Commissioners referencing the previous September Planning Commission from Mr. Garton and stated his appeal to the Board of County Commissioners was to be held on November 13th, 2024 at 9am.

ADJOURNMENT

Chair Danforth adjourned the meeting at 7:21PM.

Respectfully submitted,

Shawna Van Sickle,

Administrative Assistant

DRAFT