

DRAFT TECHNICAL MEMORANDUM

November 21, 2025

Project# 32259

To: Clint Spencer, City of Hermiston Planning Director
From: Nicholas Meltzer, PE; Matt Hughart, ACIP
CC: Joshua Lott, PE, Anderson Perry Project Engineer
RE: Hermiston RV Park Transportation Planning Rule (TPR) Compliance

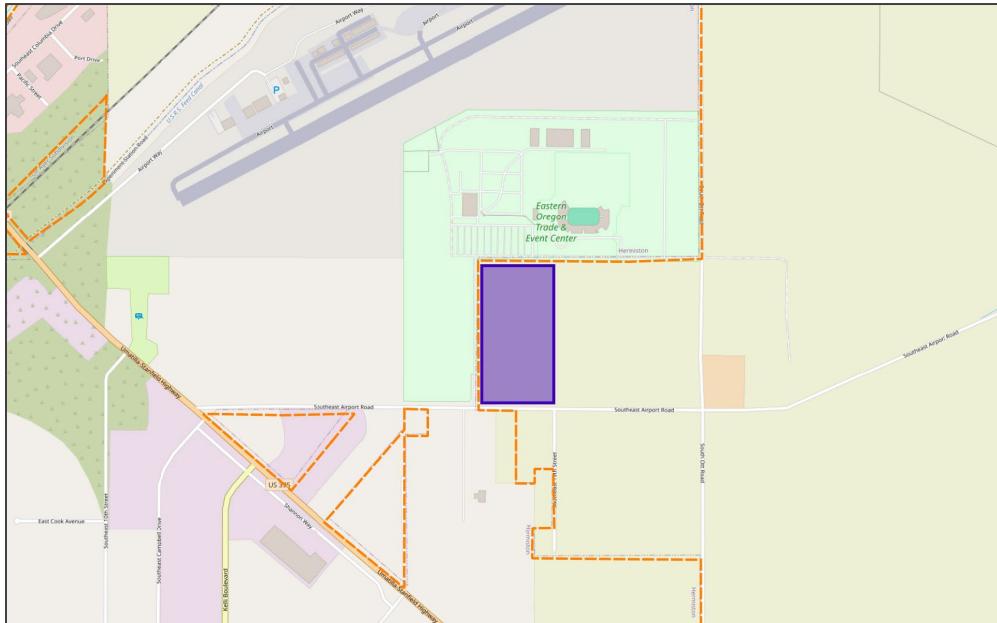
The City of Hermiston is annexing land within the Urban Growth Boundary (UGB) and outside the existing city limits. As part of the annexation, the land is proposed to be zoned C-2 ("Outlying Commercial Zone"). This memo outlines the proposed rezoning compliance with the Transportation Planning Rule (TPR) per Oregon Administrative Rule (OAR 660-012-0060).

As summarized herein, the proposed zoning does not result in a significant affect on the transportation system, assuming that a limitation on the land is placed that limits future development of the property to include a publicly owned park/field/community space and a 100-space Recreational Vehicle park and/or the equivalent of 107 weekday PM peak hour trips or 645 daily trips.

BACKGROUND

The subject site is located on E Airport Road, between US 395 and S Ott Road. It is bounded by Hermiston city limits on two sides and adjacent to the Umatilla County Fairgrounds. The site is shown in Figure 1. The proposed use of the site is park and recreation space to be owned and operated by the City of Hermiston.

Figure 1 Proposed Site of Park and Recreation Space Outlined in Purple



POLICY AND PLANNING CONTEXT

The current zoning for the site is F-1 (Exclusive Farm Use), under Umatilla County's Zoning Ordinance. Section 3.012 (7) of the Ordinance allows "Parks, playgrounds, community centers or recreational vehicle parks owned and operated by a governmental agency or a non-profit community organization (in the Hermiston Urban Growth Area only)." As noted earlier, the proposed use of the approximate 19-acre site includes a publicly owned park/field/community space and a 100-space RV Park.

The City of Hermiston is proposing to rezone the site to C-2 Outlying Commercial. A review of the permitted uses associated with the C-2 zoning provides the following guidance:

- All uses permitted under the C-1 zoning are allowed outright in C-2; of these, the higher potential trip generators include a variety of retail uses, clinics, and food uses. These could be generalized by the shopping center land use category within the *Trip Generation Manual*, as published by the Institute of Transportation Engineers.
- RV parks are an outright permitted use and subject to the requirements of Section 157.147 (this site appears to comply with the provisions of this section).
- Government structures or land uses including but not limited to a public park, playgrounds, recreational building, fire station, library or museum are allowed as conditional uses.

If one were to posit that the 19.5 acres of C-2 would be reasonably developed with a maximum floor area ratio (FAR) of 0.25, this could enable 212,350 square feet of retail space. This level of development could equate to 11,408 weekday trips, of which 971 are estimated to occur during the weekday PM peak hour¹. This level of trip generation far exceeds that of the intended use of the property by an RV park and a publicly owned park/field/community space. As such, the City is proposing a land use limitation to limit the future use of the site assuming the zone change is approved.

APPLICABLE TPR CRITERIA

Two sections of Oregon's TPR apply to amendments to acknowledged land use designations. Per OAR 660-012-0060(1) and (2), the first step in assessing an amendment's potential transportation impact is to compare the vehicular trip generation of the site assuming a "reasonable worst-case" development scenario under the existing and proposed zoning. If the trip generation potential increases under the proposed zoning, additional analysis is required to assess whether the rezone will "significantly affect" the transportation system. Conversely, if the trip generation under the proposed zoning is equal to or less than that under the existing zoning, no additional quantitative analysis is necessary to conclude that the proposal does not "significantly affect" the transportation system.

We further note that Table 1, Policy 1F.5 of the Oregon Highway Plan establishes the following thresholds for determining significance:

¹ As estimated using the *Trip Generation Manual* (11th Edition, as published by the Institute of Transportation Engineers). The 12th Edition was recently published and if these rates were used, this level of development would result in 7,727 daily trips and 868 weekday PM peak hour trips, which would yield the same conclusions related to the TPR.

- Any proposed amendment that does not increase the average daily trips by more than 400 is not considered significant.
- Any proposed amendment that increases the average daily trips by more than 400 but less than 1,000 for state facilities is not considered significant 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.

TRIP GENERATION COMPARISON

To test for a potential significant effect, we reviewed the change in trip generation potential of the permitted land uses associated with the existing versus the proposed zoning designations. As noted above, the existing zoning designation of the property is F-1 and per Section 3.012 of the County's Zoning Code, the highest trip generations permitted on the site are churches, schools, and community centers or RV parks operated by a governmental agency or non-profit organization.

The City's C-2 zoning permits a variety of high trip-generating retail uses. With no trip limits on the C2 uses, the proposed zoning designation has the potential to result in a significant impact per the TPR and OHP Policy 1F.5 based on the estimated trip generation potential. If a land use limitation of parks, playgrounds, community centers or RV Parks operated by a government agency were applied to the zone change, we estimate a trip potential of up to 645 daily trips, or 107 trips in the PM Peak Hour. As this increase is less than the 1,000 trip daily trip threshold for a two lane facility with a volume less than 5,000, the OHP policy identifies there is no significant affect. For this reason, a land use limitation is proposed.

For the purposes of developing a land use limitation associated with public uses, the trip generation was estimated for a variety of uses that could be developed under the zoning and consistent with the land use limitation. This shown in Table 1 using average trip rates (per ITE guidance) obtained from the *Trip Generation Manual, 11th Edition*.

Table 1. Estimated Trip Generation

Land Use	ITE Code	Size	Daily Trips	Weekday PM Peak Hour Trips
Campground/RV Park	416	100 Spaces	290*	27
Soccer Complex	488	4 fields	285	66
Public Park	411	5 acres**	92	23
Community Center	495	5,000 sq. ft. GFA	144	13
Library	590	5,000 sq. ft. GFA	360	41
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Soccer Complex and RV Park		100 RV Spaces AND 4 Soccer Fields	575	93

*ITE does not identify daily trip making. However, if one were to use a motel rate as a proxy, the percentage of PM trips that occur as a function of the daily trip is 9.3 percent. Based on this ratio, one could posit that the RV park could generate 365 daily trips.

**Public Parks can vary widely in intensity of use. ITE includes trip generation information for other independent variables including number of employees and daily visitors. The fitted curve equation was used to provide more accurate estimates.

Any two of the uses in Table 1 could be combined with an RV Park on the site and result in less than 1,000 daily trips. Using the thresholds in the Oregon Highway Plan described above, the amendment is not deemed to have a significant affect if the average daily trips are more than 400 but less than 1,000 for facilities where the average daily traffic is less than 5,000 for a two-lane highway.

COMPLIANCE WITH THE APPLICABLE OREGON ADMINISTRATIVE RULE CRITERIA

OAR Section 660-12-0060 of the TPR sets forth the relative criteria for evaluating plan and land use regulation amendments. Table 2 summarizes the criteria in Section 660-012-0060 and the applicability to the proposed limited zone change.

Table 2. Summary of Criteria in OAR 660-012-0060

Section	Criteria	Applicable?
1	Describes how to determine if a proposed land use action results in a significant effect.	Yes
2	Describes measures for complying with Criteria #1 where a significant effect is determined.	Yes
3	Describes measures for complying with Criteria #1 and #2 without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility.	Yes
4	Determinations under Criteria #1, #2, and #3 are coordinated with other local agencies.	Yes
5	Indicates that the presence of a transportation facility shall not be the basis for an exception to allow development on rural lands.	No
6	Indicates that local agencies should credit developments that provide a reduction in trips.	No
7	Outlines requirements for a local street plan, access management plan, or future street plan.	No
8	Defines a mixed-use, pedestrian-friendly neighborhood.	No
9	A significant effect may not occur if the rezone is identified on the Comprehensive Plan and assumed in the adopted Transportation System Plan.	No
10	Agencies may consider measures other than vehicular capacity if within an identified multimodal mixed-use area (MMA).	No
11	Allows agencies to override the finding of a significant effect if the application meets the balancing test.	No

As shown in Table 2, there are eleven criteria that apply to Plan and Land Use Regulation Amendments. Of these, four are applicable to the proposed land use action. These criteria are provided below in italics with our response shown in standard font.

OAR 660-12-0060(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 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.

Response: The proposed change in zoning designation could result in an increase in daily trip making although no changes to the City's functional street classification designations or standards are warranted by the change in designation. The intended function of the adjacent facilities are appropriate for use by F-1 and C-2.

(2) If a local government determines that there would be a significant effect, then the local government must ensure that allowed land uses are consistent with the performance standards of the facility measured or projected at the end of the planning period identified in the adopted TSP through one or a combination of the remedies listed in subsections (a) through (c) below, unless the amendment meets the balancing test in subsection (c) or qualifies for partial mitigation in section (11) of this rule. A local government using subsection (c), section (3), section (10) or section (11) to approve an amendment recognizes that additional motor vehicle traffic congestion may result and that other facility providers would not be expected to provide additional capacity for motor vehicles in response to this congestion.

(3) Notwithstanding sections (1) and (2) of this rule, a local government may approve an amendment that would significantly affect an existing transportation facility without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility where:

(a) In the absence of the amendment, planned transportation facilities, improvements and services as set forth in section (4) of this rule would not be adequate to achieve consistency with the identified function, capacity or performance standard for that facility by the end of the planning period identified in the adopted TSP;

(b) Development resulting from the amendment will, at a minimum, mitigate the impacts of the amendment in a manner that avoids further degradation to the performance of the facility by the time of the development through one or a combination of transportation improvements or measures;

(c) The amendment does not involve property located in an interchange area as defined in paragraph (4)(d)(C); and

(d) For affected state highways, ODOT provides a written statement that the proposed funding and timing for the identified mitigation improvements or measures are, at a minimum, sufficient to avoid further degradation to the performance of the affected state highway. However, if a local government provides the appropriate ODOT regional office with written notice of a proposed amendment in a manner that provides ODOT reasonable opportunity to submit a written statement into the record of the local government proceeding, and ODOT does not provide a written statement, then the local government may proceed with applying subsections (a) through (c) of this section.

Response: The City of Hermiston is establishing a land use limitation associated with the site to limit future use to 107 weekday PM peak hour trips or 645 daily trips. This reasonable accommodation ensures the site can be developed without triggering a significant affect under the Oregon Transportation Planning Rule. This land use limitation allows for a combination of public uses.

(4) Determinations under sections (1)-(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.

Response: The Applicant is coordinating the proposed zone change with County and ODOT staff.

CONCLUSIONS

As discussed herein, there are adequate facilities to accommodate the proposed change in zoning, assuming a limitation is placed on the future use of the C-2 zoned lands. This proposed limitation is associated with a land use limitation that limits trips to 107 in the PM Peak and 645 daily. Using the thresholds in the Oregon Highway Plan, the amendment is not significant if the average daily trips are more than 400 but less than 1,000 for facilities where the average daily traffic is less than 5,000 for a two-lane highway. As such, there are no significant affects on the transportation system as defined by the TPR.

The City of Hermiston is proposing an enforceable, ongoing land use restriction that would demonstrably limit development to levels no greater than the proposed 100 space RV Park and associated park/field/community space.

We note that future development review is anticipated under separate cover to address topics including but not limited to assessment of intersection operation and safety.