



# PLANNING DEPARTMENT

P.O. Box 40 • Irrigon, Oregon 97844  
(541) 922-4624 or (541) 676-9061 x 5503  
FAX: (541) 922-3472

## AGENDA

**Morrow County Planning Commission**

**Tuesday, April 28, 2026, 6:00 pm**

**Morrow County Government Center, Irrigon, OR**

**[For Electronic Participation See Meeting Information on Page 2](#)**

### Members of Commission

Stacie Ekstrom, Chair

John Kilkenny, Vice Chair

Norma Ayala

Brian George

Stephen Henthorn

Karl Smith

Tripp Finch

Brian Thompson

Elizabeth Peterson

### Members of Staff

Tamra Mabbott, Planning Director

Stephen Wrecsics, GIS Analyst

Michaela Ramirez, Administrative Assistant

George Cress, Principal Planner

Clint Shoemake, Planning Technician

Kaitlin Kennedy, Code Compliance Planner

1. **Call to Order**
2. **Roll Call**
3. **Pledge of Allegiance**
4. **Minutes:** (Draft) March 31, 2026, IAMP Work Session ([pg. 4-7](#)) and Planning Commission Meeting ([pg 9-14](#))
5. **Public Hearings** to begin at 6:00 PM (COMMISSION ACTION REQUIRED)
  - I. **Morrow County Comprehensive Plan and Zoning Ordinance Amendment TSP-164-26, Tower Road Interchange Area Management Plan (IAMP) Adoption.** This hearing is to adopt the Tower Road Interchange Area Management Plan (IAMP). The adoption includes proposed amendments to the Morrow County Comprehensive Plan, adoption of the IAMP Overlay Zone (IAMP-O, Section 3.125) into the Morrow County Zoning Ordinance, and a Zoning Map Amendment to apply the IAMP Overlay Zone to the Tower Road Interchange area. [pg 16-70](#)
  - II. **Planning Commission Work Session.** This work session will be an active discussion among commission members and staff about commercial trucking businesses in residential zones. The public is welcome to listen, but public testimony will not be invited. [pg 72-77](#)
6. **Other Business: There are no applications for the month of May.**

7. **Correspondence:**
  - I. April Monthly Update [pg 79-84](#)
8. **Public Comment:**
9. **Adjourn**

**Next Meeting:** Tuesday, May 26, 2026, at 6:00 p.m.  
Location: Morrow County Government Center, Irrigon, OR

### **ELECTRONIC MEETING INFORMATION**

Morrow County Planning is inviting you to a scheduled Zoom meeting. Topic: Planning Commission  
Time: April 28, 2026, 6:00 PM Pacific Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/6554697321?pwd=dFMxR2xlaGZkK1ZJRFVrS1Q0SmRxUT09&omn=84249165172>

Meeting ID: **655 469 7321**

Passcode: **513093**

Find your local number: <https://us02web.zoom.us/u/kdmj6471tm>

**Should you have any issues connecting to the Zoom meeting, please call 541-922-4624. Staff will be available at this number after hours to assist.**

*This is a public meeting of the Morrow County Planning Commission and may be attended by a quorum of the Morrow County Board of Commissioners. Interested members of the public are invited to attend. The meeting location is accessible to persons with disabilities. A request for an interpreter for the hearing impaired, or for other accommodations for persons with disabilities, should be made at least 48 hours before the meeting to Tamra Mabbott at (541) 922-4624, or by email at [tmabbott@morrowcountyor.gov](mailto:tmabbott@morrowcountyor.gov).*

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**Draft Minutes of the  
Morrow County  
Tower Road IAMP Joint Work Session  
Tuesday, March 31, 2026, 5:00 pm  
Morrow County Government Center  
215 NE Main Ave, Irrigon, OR**

**COMMISSIONERS PRESENT:**

Stacie Ekstrom, Chair  
Tripp Finch  
Karl Smith  
Stephen Henthorn  
John Kilkenny  
Charlene Cooley  
John Kilkenny  
Liz Peterson

**BOARD OF COMMISSIONERS PRESENT:**

Chair Sykes  
Jeff Wenholz  
Gus Peterson

**COMMISSIONERS ABSENT:**

Brian Thompson

**ATTENDANCE via ZOOM:****STAFF PRESENT:**

Tamra Mabbott, Planning Director  
George Cress, Principal Planner  
Michaela Ramirez, Administrative Assistant  
Kaitlin Kennedy, Code Compliance Planner

**Staff Zoom:**

Stephen Wrecsics, GIS Analyst

Chair Sykes called the work session meeting to order.

**Exit 159, I-84 Tower Road Interchange Area Management Plan.**

**Director Mabbott:** explained that this was an informal work session

Nick Foster, a transportation engineer from Kittleson & Associates, gave the IAMP presentation through PowerPoint. He referenced the associated code amendments and the implementation of the Tower Road IAMP Overlay Zone that would take place throughout the adoption of this process.

**Commissioner Wenholz:** pointed out that the Project Overview slide didn't include the changes to the RDO farm. He felt that there were major sources of employment and traffic commuting in the area. He asked why these impacts weren't considered.

**Nick:** responded that they had spoken and settled this about a year ago. He also stated that anything accessed on Marty Myers Road wouldn't have been captured.

**Commissioner Wenholz:** said that because there were already three dairies out there, what's to say there wouldn't be more to come.

**Nick:** explained that this area was intensely looked at because they thought of future development.

**Planning Commissioner Kilkenny:** asked if there was another exit further west.

**Director Mabbott:** said yes.

**Planning Commissioner Kilkenny:** asked if the exit indicated it.

**Nick:** responded yes and continued with PowerPoint.

**Director Mabbott:** explained that the actual access control and the interchange design were in an area they anticipated would be further developed.

**Nick:** explained that the plan was to use the interchange as a primary access because they felt this was a higher-intensity traffic generator. Based on projections, the inability to handle traffic brought concerns north and south of the interchange. He then moved on to the outreach survey taken and touched on the concerns people had. He also said that this interchange was going to experience an intense increase in traffic. 18:45 He presented the initial nine different concepts for the interchange and said they drew five of them with more detail. He stated that their plan was to build in phases for safety and financial reasons. The preferred concept was concept #5.

**Commissioner Peterson:** asked if this concept included potentially expanding the bridge.

**Nick:** responded that with this concept, assume the bridge remains the same.

**Planning Commissioner Kilkenny:** asked about the dangerously backed-up traffic on the freeway.

**Nick:** answered that under the analysis they had, they should be able to change it.

**Rory:** commented that he was concerned about commercial trucks having issues with the roundabout.

**Planning Commissioner Henthorn:** commented that the roundabouts could accommodate that type of vehicle.

**Nick:** explained how this would be worked out.

**Planning Commissioner Kilkenny** asked if they were keeping the two exits on the westbound side.

**Nick:** responded yes, they were keeping the exits because of the oversized load issue. He also explained that on other bridges on I-84, commercial vehicles would have to go over the bridge because of their height.

**Commissioner Wenholz:** asked how a truck would navigate a roundabout in that situation.

**Planning Commissioner Henthorn:** commented that to do so, they would adjust the radius.

**Nick:** gave different options of where these types of vehicles could navigate and explained that they would look at it during the final design. He continued with the different phases of the project.

**ODOT Engineer Marlow:** asked if the total cost numbers included Tower Road enhancements.

**Nick:** responded that he didn't believe so.

**Planning Commissioner Henthorn:** asked if there were funds to cover the anticipated cost of the improvements.

**Nick:** responded yes, there were funds to cover the cost, and then continued with the Phasing Option slides.

**Planning Commission Ayala:** asked how far south the change was going to go.

**Nick:** responded all the way to Airport Lane, which was about a mile.

**Planning Commission Finch:** asked if there were other options or if they were going to install stop lights.

**Nick:** responded that both analyses included stop lights and roundabouts.

**Planning Commission Finch:** asked if signals were more expensive than roundabouts.

**Nick:** responded no, there were not.

**Planning Commission Henthorn:** asked if there was a time frame for the traffic impact.

**Nick** answered that it would vary by the contractor.

**Planning Commission Peterson:** asked if the roundabouts were the ideal way to go.

**Director Mabbott:** said they were much safer and they slowed traffic down.

**Planning Commission Henthorn:** commented on how the roundabout could be constructed.

**Rory:** commented that the roundabout would have to be big to accommodate mega loads over 200ft.

**Marlow:** says they could design a roundabout that would accommodate a mega load.

**Nick:** spoke on implementing actions, Ordinances, Code Changes, and also spoke about next steps. He also said that the Oregon Department of Transportation would have to approve and refine the Oregon Highway Plan (OHP), and then they would have to find the funding.

**Director Mabbott:** spoke on what items would have to be adopted.

**Commissioner Peterson:** asked what mechanisms they would be looking for in the funding.

**Nick:** responded that they would hope for federal funding.

**Director Mabbott:** said SPC's, or system development charges, were something we could implement as a county but were not normally used in rural areas. More likely, it would be state funds, and other funding sources. She informed everyone about the Transportation Plan and that the adoption will be at the April Planning Commission. 55:11

**Planning Commission Peterson:** asked about when they came back to present, would there be more options, and would the cost increase or not with changes being made.

**Nick:** responded that it depended on the level of change.

**Planning Commission Henthorn:** asked if the cost would increase with the change of the roundabout.

**Commissioner Peterson:** clarified the concern, which was that the roundabout on Tower Road was not on the interchange itself.

**Nick:** explained that it could depend on the conditions of approval for that development; they would have to choose one or the other (roundabout or signal).

**Director Mabbott:** asked about the funding, would their focus of the research be on the interchange or Tower Road.

**Planning Commissioner Kilkenny:** wondered why the property wasn't residential.

Ended at 6:09 pm

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**Draft Minutes of the Public Meeting of the  
Morrow County Planning Commission  
Tuesday, March 31, 2026, 6:00 pm  
Morrow County Government Center  
215 NE Main Ave, Irrigon, OR**

**COMMISSIONERS PRESENT:**

Stacie Ekstrom, Chair  
Karl Smith  
Stephen Henthorn  
Liz Peterson  
Charlene Cooley  
Norm Ayala  
John Kilkenny  
Tripp Finch

**COMMISSIONERS ABSENT:**

Brian Thompson

**ATTENDANCE via ZOOM:****STAFF PRESENT:**

Tamra Mabbott, Planning Director  
George Cress, Principal Planner  
Michaela Ramirez, Administrative Assistant  
Kaitlin Kennedy, Code Compliance Planner

**Staff Zoom:**

Stephen Wrecsics, GIS Analyst

**1. CALL TO ORDER**

Chair Ekstrom called the meeting to order at 6:31 PM

**2. ROLL CALL****3. PLEDGE****4. APPROVAL OF February 24, 2026, DRAFT MINUTES with these changes:**

**Add Brian Thompson to the list of present Commissioners, page 6, replace the word more " with " additional" in Chair Ekstrom's question about opponents, and page 8, Kelly Doherty's comment should read "I heard you state that the ponds were going to be drained".**

**Motion to accept the minutes with changes by: Commissioner Finch**

**Seconded by: Commissioner Smith**

**Recommended Action: Approve**

**Action: Unanimously Approved**

**Presented by: Planning Director Tamra Mabbott**

**Request: to re-open Continued Land Use Decision LUD-N-088-25: Tim Seck, Well Springs LLC, a subsidiary of MN8 Energy Development Company, Property Owner: April Miller LePage and Nolan Miller.** The request is to permit a standalone 230kV substation as a "utility facility necessary for public service" within a 13-acre building envelope on an approximately 633-acre parcel. The Miller substation is proposed on property described as tax lot 3000 of Assessor's Map 2N 23 located approximately 3 miles east of State Highway 74 on the north side of Immigrant Lane, south of Interstate 84, approximately 14 miles. Criteria for approval include MCZO Article 3 Section 3.010(D) and 3.010(F)(10).

Commissioners Henthorn and Peterson abstained from voting.

Chair Ekstrom noted that the commissioner's abstention from the previous meeting was still on the record.

**Director Mabbott:** pointed out that on page 22 of the packet, there were new exhibits to add to the record.

Chair Ekstrom asked for a vote to add the new exhibits to the record.

**Motion made by:** Commissioner Finch

**Seconded by:** Commissioner Smith

**Recommended Action:** Approve

**Action:** Unanimously Approved

**Director Mabbott:** read through the conditions of approval on pages 14 through 20.

**Commissioner Ayala:** asked if there was a related application tied to this substation.

**Director Mabbott:** responded that they were expecting a solar project and a transmission line.

**Commissioner Ayala:** asked how long the project would sit there without being connected to anything.

**Director Mabbott:** responded that she didn't think the substation would be constructed if there wasn't a project tied to it. She also pointed out that the forthcoming projects are mentioned in the findings.

**Commissioner Ayala:** expressed her concern about a project being pulled and wondered if it had anything to do with this particular substation.

**Director Mabbott:** responded that the solar project in question pulled out at the state EFSC level and had the option of permitting at the county level.

Chair Ekstrom asked if anyone had questions. There were none.

Chair Ekstrom closed the public hearing and called for a motion to either approve or deny the Land Use Decision.

**Recommended Action:** Approve **Land Use Decision LUD-N-088-25**

**Motion to Approve:** **Land Use Decision LUD-N-088-25 with conditions proposed by staff.**

**Motion by:** Commissioner Finch

**Seconded by:** Commissioner Ayala

**Vote:** All voted, except Commissioners Henthorn and Peterson, who abstained

**Action:** Unanimously approved by the remainder of the Commissioners

**Commissioner Kilkenny:** asked why this item came before the Planning Commission. Was it because there were no projects attached to it when they submitted the application.

**Director Mabbott:** explained that an adjoining property owner represented by a lawyer stated some concerns. Also, when the application was submitted, it was not attached to a project.

Commissioner Henthorn abstained from the agenda item.

**Presented by:** Planning Director Tamra Mabbott

**Request: to re-open Land Use Decision LUD-N-089-25: Leif Van Acker, Kimley-Horn, Applicant, Property Owner Amazon Data Services, Inc.** The request is to site a data center campus on property zoned Airport Light Industrial (ALI). The property is described as tax lot 136 of Assessor's Map 4N 24E, located approximately 3.7 miles west of Boardman's Urban Growth Boundary, southeast of the Boardman Airport, and southwest of the Tower Road/I-84 interchange. Criteria for approval include

Morrow County Zoning Ordinance (MCZO) Article 3 Section 3.076 Airport Light Industrial, ALI, Section 3.092 Airport Safety and Compatibility Overlay Zone, ASC, and Article 4 Supplementary Provisions.

**Director Mabbott:** announced the list of previous meeting dates and the exhibits that pertained to each meeting. She asked for safekeeping if they could be added to the record again, along with the new exhibit list.

Chair Ekstrom asked for a vote to add the exhibits to the record.

**Motion made by:** Commissioner Cooley

**Seconded by:** Commissioner Smith

**Recommended Action: Approve**

**Action:** Unanimously Approved

**Director Mabbott:** read the new conditions of approval, subsequent conditions, and the ongoing conditions.

Chair Ekstrom asked the Commission if they had any questions for staff. There were none.

Chair Ekstrom closed the public hearing.

**Commissioner Kilkenny:** He wanted to clarify the distance of the ponds from the runway with particular turbines landing on the strip.

**Director Mabbott:** asked County Counsel if she could ask the applicant to explain because she felt she couldn't give a clear answer.

**Counsel Dan:** said it should be fine as guidance.

**Megan, applicant counsel:** explained that the state statute has a minimum of 5,000 feet, and if the county wants to regulate water impoundments outside of that, it can be written in the findings. She stated that Morrow County had exercised that authority and said it was regulating the 5,000 feet off the end of the runway, the county was also regulating 5,000 feet off the edge of the runway, which exceeded the state minimum.

**Commissioner Finch:** asked if it would restrict the airport from landing any turbines engine jets from this point forward because of where the ponds would be placed.

Chair Ekstrom asked if there were any additional questions.

**Commissioner Finch:** asked if it was still going to be zoned Airport Industrial.

**Director Mabbott:** responded that it would be Airport Light Industrial.

**Commissioner Finch:** expressed that allowing data centers in that zone seemed to change the nature of the zone and felt that was inconsistent with Goal 2. He was concerned the data center was too close to the airport.

**Director Mabbott:** explained the zone in question.

**Commissioner Finch:** was concerned with allowing this size of data centers in this zone because of the potential impacts of limiting airport-related uses at the airport.

**Director Mabbott:** 38:21 responded that the county is trying to make sure the standards are in place for data centers and that developments are checking all the boxes.

**Commissioner Kilkenny:** asked what the difference was between industrial and light industrial.

**Director Mabbott:** said she believed that the airport sponsor requested that the county change the code to allow data centers in this zone.

**Commissioner Finch:** said that it appeared to him that someone didn't want it to be an airport anymore, that they want it to be a data center campus. He again expressed his concern that Boardman and the Port of Morrow would lose their airport to the development of data centers.

**Commissioner Kilkenny:** also expressed his concerns with the netting, water, and the birds.

**Commissioner Peterson:** asked if the Port owned the airport.

**Director Mabbott:** responded yes.

**Commissioner Peterson:** asked if the Port didn't have an opposition to the data center because they sold the land.

**Director Mabbott:** said that the Port is providing water and wastewater connections.

There was talk about the property's Airport Light Industrial zone and its future.

**Commissioner Finch:** pointed out language in the Comprehensive Plan, particularly how a data center is not conducive to aviation activities.

**Director Mabbott:** responded that Airport Industrial Zones has to complement airport use and can not conflict with the functionality of the airport.

**Commissioner Kilkenny:** commented that his second question about the height restriction in last month's meeting was answered, but he still wanted some clarification.

**Director Mabbott:** read the explanation to Commissioner Kilkenny's question from page 292 of the packet.

**Megan** explained in more detail, and an image was displayed for a visual.

**(GIS Analyst) Stephen:** explained each level of the image.

Chair Ekstrom asked if there were any additional questions. There were none.

Chair Ekstrom closed the public hearing.

Elaine Albrich: asked Counsel Dan (in the online chat) that she assumed voting didn't need to be done by roll call because the minutes should reflect the Planning Commission participation.

Counsel Dan: responded that it was correct. He also assumed the minutes would indicate a unanimous vote to approve. He mentioned that he didn't like not having a roll call vote because it wasn't clear how the Planning Commission voted.

Director Mabbott: reassured both Elaine and Counsel Dan that the minutes would reflect the votes.

**Recommended Action: Land Use Decision LUD-N-089-25**

**Motion to Approve: Land Use Decision LUD-N-089-25 with amended findings**

**Motion by:** Commissioner Ayala

**Seconded by:** Commissioner Smith

**Vote:** Roll call was made for the voting, except Commissioner Henthorn

**Action:** there were 5 yes votes and 2 No's, the agenda item was approved by majority vote.  
1:19

**Presented by: George Cress, Principal Planner**

**Request: Variance V-N-062-26: Rock It, LLC, Wade Aylett, Applicant and Owner:** The property is described as tax lot 800 of Assessor's Map 5N 26E 23A. The property is zoned Rural Residential (RR) and located on Washington Lane, approximately 0.7 miles west of the Irrigon city limits. The request is to allow a variance to seek relief from the age requirement for a manufactured home. Criteria for approval include Morrow County Zoning Ordinance (MCZO) Section 4.110(B) Manufactured Homes in a Rural Residential Zone and 7.200 Major Variance.

Chair Ekstrom asked the commission members if anyone needed to abstain, declare a conflict of interest, bias, or have any ex parte contact. There were none.

Chair Ekstrom asked if there was anyone in the audience requesting that a member of the Commission abstain or declare a conflict of interest, bias, or have any ex parte contact. There were none.

Chair Ekstrom asked if there were any questions for the staff.

**Commissioner Finch:** asked if a garage or carport was also required for non-manufactured homes or if it was specific to them.

**Stephen Wrecsics:** responded that it is not required for a stick-built home.

Chair Ekstrom asked if there were any additional questions for staff. There were none.

Chair Ekstrom asked invited the applicant to present testimony and evidence.

Testifying Parties:

Tylla Baumgartner, PO Box 86, Echo, OR 97826

Wade Aylett, 75134 Oregon Lane, Irrigon, OR

**Wade:** explained why they had to submit two separate variance requests for the property. He wanted to replace two aging manufactured homes with newer models.

Chair Ekstrom asked if there were any opponents. There were none. She then asked if there were any neutral parties. There were none.

Chair Ekstrom asked if anyone wanted to continue the hearing or hold the record open. There was no response.

Chair Ekstrom then closed the Public Hearing.

Chair Ekstrom asked if the Commission had any additional questions. There were none.

**Recommended Action: Variance V-N-062-26**

**Motion: Variance V-N-062-26**

**Motion by:** Commissioner Kilkenny

**Seconded by:** Commissioner Ayala

**Vote:** All voted

**Action:** Unanimously Approved

**Other Business:** Commissioner Cooley gave her resignation from the Planning Commission

**Correspondence:** February and March Monthly Update

**Public Comment:**

**Adjourned:** Meeting adjourned at 7:51 PM

**Next Meeting:** Tuesday, April 28, 2026, at 6:00 p.m. The next meeting will be held in Irrigon, OR, at the Morrow County Government Center.

**Respectfully submitted,  
Michaela Ramirez**

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P.O. Box 40 • 215 NE Main Ave. Irrigon. Oregon 97844  
(541) 922-4624 • www.morrow.or.us/planning

April 16, 2026

MEMO

TO: Morrow County Planning Commission *KMK*  
FROM: Kaitlin Kennedy, Compliance Planner; Tamra Mabbot, Planning Director *TJM*  
RE: Adoption of Exit 159 I-84 Tower Road Interchange Area Management Plan (IAMP) and Comprehensive Plan Amendment TSP-164-26.

The purpose of this memorandum is to recommend formal adoption of the Interchange Area Management Plan (IAMP) for the I-84 Interchange at Tower Road (Exit 159).

The IAMP has been developed over the past eighteen months through a coordinated effort involving Morrow County, the Oregon Department of Transportation (ODOT), Kittelson & Associates, and a range of local and regional stakeholders. The planning process included a comprehensive evaluation of existing traffic conditions, safety considerations, and anticipated future transportation needs associated with ongoing growth and development in the surrounding area.

A key objective of the IAMP is to preserve the long-term operational performance and safety of the Tower Road interchange over a twenty-year planning horizon. The plan identifies strategies and improvements necessary to maintain acceptable levels of service while supporting economic development and land use objectives in the region. Implementation of the plan will include the formal adoption and application of the Tower Road Interchange Access Management Plan Overlay Zone (attached), as codified in Morrow County Zoning Ordinance (MCZO) Section 3.125.

Public and stakeholder engagement has been integral to the development of the plan. Input was gathered through a Technical Advisory Committee (TAC), a Public Advisory Committee (PAC), and broader public outreach efforts. Stakeholders included representatives from the Port of Morrow, City of Boardman, Morrow County departments, regional service providers, and other interested parties. Feedback received throughout the process informed the evaluation and selection of preferred improvement strategies.

The adopted IAMP identifies a preferred set of transportation improvements, including the phased implementation of roundabouts at key intersections to address capacity constraints and improve safety. The phased approach allows the County and its partners to align infrastructure investments with development timing and available funding.

A joint work session was held on March 31, 2026, to present the final plan and receive input from the Board of Commissioners, Planning Commission, and project stakeholders. Comments received during this session have been incorporated into the final IAMP document, where appropriate.

Formal adoption of the Tower Road IAMP will establish a clear framework for managing access and guiding transportation improvements within the interchange area. It will also enhance coordination with ODOT on future permitting and project development, helping ensure that infrastructure keeps pace with planned growth. ODOT will continue advancing the adoption process through the Oregon Transportation Commission (OTC).

**Recommendation:**

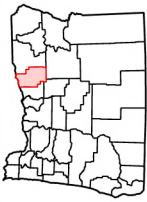
The Morrow County Planning Commission to formally adopt the I-84 Tower Road (Exit 159) Interchange Area Management Plan (IAMP), including implementation of the associated access management policies and the Tower Road Interchange Access Management Plan Overlay Zone (MCZO Section 3.125).

Please refer to the full IAMP document and supporting materials available on the Morrow County Planning website for additional detail. [www.morrowcountyor.gov/planning/page/tower-road-2025-iamp](http://www.morrowcountyor.gov/planning/page/tower-road-2025-iamp)






# Notice Area

Boardman

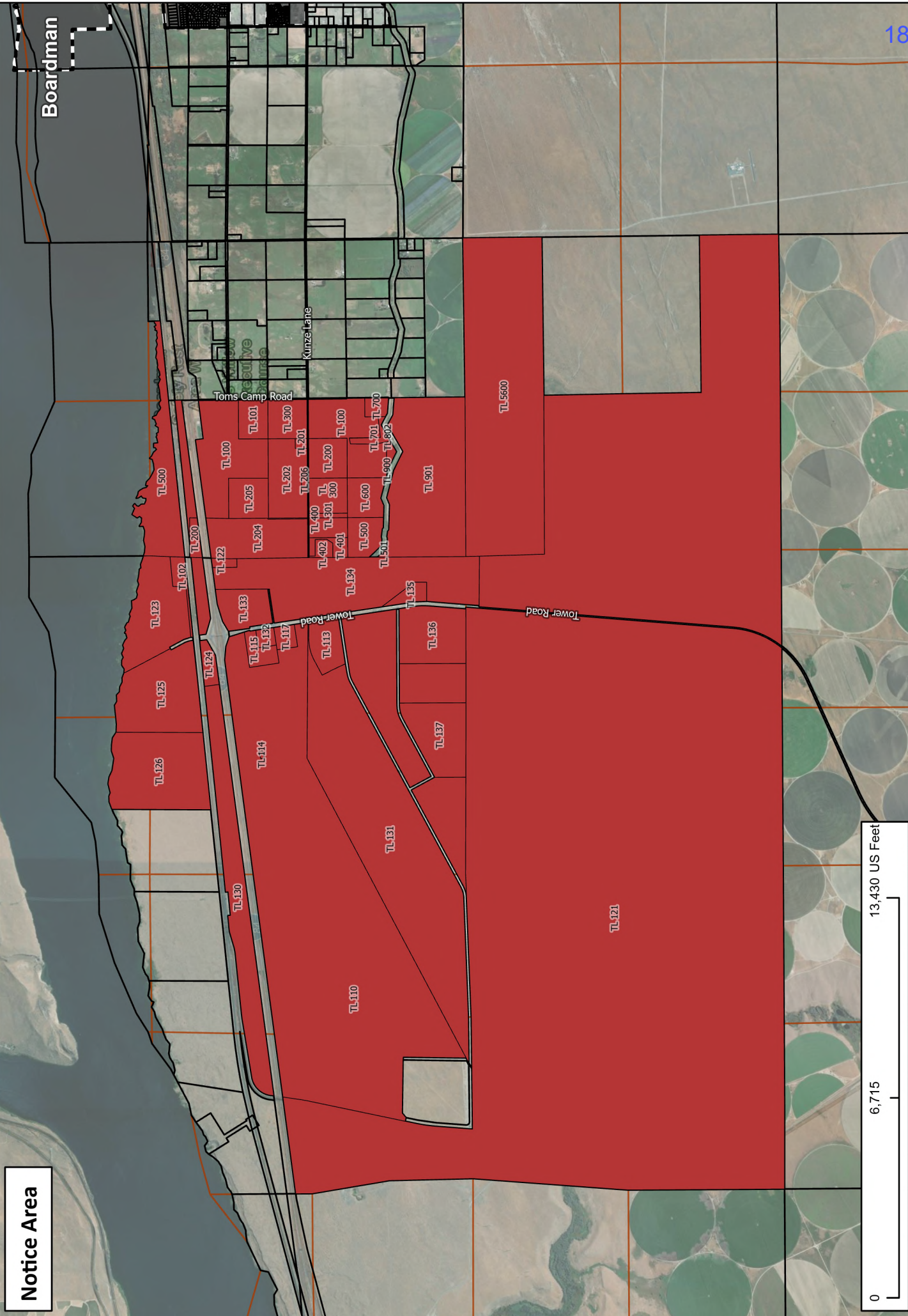


Coordinate System:  
 NAD 1983 HARN StatePlane Oregon North FIPS 3601  
 Projection: Lambert Conformal Conic  
 Datum: North American 1983 HARN  
 Cartography By: Stephen Wirecs  
 Morrow County Planning Department  
 Date Saved: Thursday, May 29, 2025  
 Folder: S:\Planning\Transportation - Plans, etc\Tower Road IAMP

-  Morrow County Boundary
-  Taxlots
-  Noticed Properties



## Tower Road IAMP Notice Properties



Date 17 April 2026  
Subject Morrow County IAMP  
To Kristine Connolly, PE, Dhruv Nair, & Nick Foster, AICP, RSP1, Kittelson & Associates  
From Shelley Denison, AICP, Marcy McInelly, AIA, Urbsworks, Inc.

## TASK 8.2 | IMPLEMENTING ORDINANCE FOR I-84 EXIT 159 TOWER ROAD IAMP

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### **Task 8.2 Implementing Ordinances and Code Changes**

Based on the recommendations in TM#7, Urbsworks shall prepare an Ordinance Memorandum for the interchange with adoption-ready recommended code changes and supporting ordinances for implementation of the IAMP. Memorandum must be prepared using strikethrough to show deletions to code and underline to show additions. Urbsworks shall design ordinances and code changes to enable plan implementation and protect facility and corridor function. Urbsworks' policies and ordinances must ensure that the County codes provide for the coordination of land use and the transportation system and allow for proper application of the IAMP. Ordinances must include the following:

- Access management ordinances and policies such as driveway and public road spacing, median control and signal spacing standards,
- Standards to protect future operations of roads, and freight and transit corridors,
- Regulations ensuring safe and convenient multi-modal facilities,
- A process for Agency notification and coordinated review of future land use decisions affecting transportation facilities, and
- Regulations ensuring that amendments to land use designations, densities and design standards are consistent with function, capacity, and level of service of facilities identified in TSP.

## Introduction

Tech Memo #7 includes the recommendation to amend the County’s Zoning Ordinance in order to codify relevant requirements regarding the application, standards, and administration of the IAMP. After reviewing the Ordinance, the following articles and respective sections are proposed for amendments:

- Article 2, Establishment of Zones, Identified Zone Designations
- Article 3, Zoning District Designations
- Article 4, Supplemental Standards, Access
- [Article 5, Development Permits, Zoning Permit, Review Standards; Submittal Requirements](#)
- [Article 5, Development Permits, Site Plan Review, Review Criteria](#)
- Article 9, Administrative Provisions

## Additional Recommendations

In addition to these proposed amendments to the Zoning Ordinance, we recommend additional implementation actions be considered during the county’s TSP update. The additional recommendations listed below would specifically address potential transportation impacts of development and support the purpose of the IAMP overlay:

1. In order to account for the impacts of cumulative development within the County, require Transportation Impact Analyses to incorporate background trips from in-process developments.
2. Establish an assessment collection system (similar to fees-in-lieu or SDCs) as an impact mitigation tool. This would include a requirement that all applications for development within [the IAMP Overlay Zone](#) must include a trip generation estimate.
3. When determining the cost of transportation improvements and mitigation, assume the 20-year buildout identified by Kittelson in the Interchange Access Management Plan.

## Key to Amendments

Proposed amendments are [blue and underlined](#).

Article / Section	Overview of current provisions	Proposed amendments
Article 2, Establishment of Zones, Identified Zone Designations	References the zoning map and lists the zone districts.	Amend this section to include the name of the new zone. Amend the zoning map figure to display the new I-84 Exit 159 Tower Road IAMP.

**SECTION 2.010. IDENTIFIED ZONE DESIGNATIONS.** For the purpose of this ordinance, the following zones are hereby identified.

<b>Zone Designation</b>	<b>Abbreviated Designation</b>	<b>Code Section</b>	<b>Effective Date</b>
Exclusive Farm Use Zone	EFU	3.010	08-01-2016
Resource Related Industrial Zone	RRI	3.015	10-01-2013
Forest Use Zone	FU	3.020	08-01-2016
Rural Service Center Zone	RSC	3.030	01-01-2011
Umatilla Depot Wildlife Habitat Zone	UDWH	3.035	11-01-2014
Rural Residential Zone	RR	3.040	09-28-2005
Farm Residential Zone	FR	3.041	09-28-2005
Rural Residential Ten Zone	RR-10	3.042	7-15-2021
Suburban Residential Zone	SR	3.050	03-06-1985
Suburban Residential 2A Zone	SR-2A	3.051	10-28-2006
General Commercial Zone	C-G	3.060	04-30-2015
Tourist Commercial Zone	TC	3.061	03-15-2006
General Industrial Zone	M-G	3.070	01-01-2011
Air/Industrial Park Zone	AI	3.071	03-06-1985
Space Age Industrial Zone	SAI	3.072	10-01-2013
Port Industrial Zone	PI	3.073	02-01-2014
Umatilla Army Depot Military Zone	UADM	3.074	11-01-2014
Rural Light Industrial Zone	RLI	3.075	03-15-2006
Airport Light Industrial Zone	ALI	3.076	06-17-2016
Airport Approach Zone	A-A	3.090	06-17-2016
Airport Hazard Zone	A-H	3.091	06-17-2016
Airport Safety and Compatibility Overlay Zone	ASC	3.092	06-17-2016

Flood Hazard Overlay Zone	FP	3.100	01-01-2011
Limited Use Overlay Zone	LU	3.110	03-06-1985
UMCD PI Limited Use Overlay Zone	(none)	3.120	11-01-2014
<a href="#">Interchange Access Management Plan Overlay Zone</a>	<a href="#">IAMP-O</a>	<a href="#">3.125</a>	<a href="#">xx-xx-xxxx</a>
Speedway Limited Use Overlay Zone	SO	3.130	01-23-2008
Parkland Overlay Zone	PO	3.150	04-01-2011
Significant Resource Overlay Zone	SRO	3.200	10-01-2013
Historic Buildings and Sites	(none)	3.300	03-06-1985

Article / Section	Overview of current provisions	Proposed amendments
Article 3, Zoning District Designations	Article 3 contains the 21 base zones and 8 overlay zones in the county. Each base zone section generally consists of land use listing, development standards, parking requirements, and other provisions such as traffic impacts requirements. Overlay zones generally consist of purpose statement, land use limitations, development standards unique to the overlay, and other provisions as necessary for administration.	Introduce a new zone subchapter (3.125 Interchange Area Management Plan Overlay Zone), to establish the overlay zone for the I-84 Exit 159 Tower Road IAMP and future IAMPs.

**See proposed Section 3.125 at the end of this document.**

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Article / Section	Overview of current provisions	Proposed amendments
Article 4, Supplemental Standards, Access	Standards and applicability of provisions elsewhere in the Zoning Ordinance regarding access and spacing, management plans, etc. to enables the IAMP Overlay to apply to the specified area.	Allow IAMPs for areas of influence within state highway areas.

### Section 4.010(F):

Access within the Influence Area of an Interchange [Access to a public or private crossroad located within the influence area of existing or proposed state highway interchange is regulated by standards in OAR 734-051, the Morrow County Transportation System Plan, and any applicable Interchange Area Management Plan \(IAMP\) adopted by the County and ODOT.](#)

These standards do not retroactively apply to interchanges existing prior to adoption of the 1999 Oregon Highway Plan, except or until any redevelopment, change of use, or highway construction, reconstruction or modernization project affecting these existing interchanges occurs. It is the goal at that time to meet the appropriate spacing standards, if possible, but, at the very least, to improve the current conditions by moving in the direction of the spacing standard.

Article / Section	Overview of current provisions	Proposed amendments
Article 5, Development Permits, Zoning Permit, Review Standards; <a href="#">Submittal Requirements</a>	Details the application requirements, review standards, and processes for zoning permits.	Add new language as applicable to the new specified IAMP area; require traffic generation estimates for applications for development within the overlay zone at the ministerial review level.

**Section 5.010(D):**

**D. Review Standards.**

1. The proposed land use is allowed in the underlying land use district.
2. If a land use approval (i.e. Site Plan Review, Conditional Use Permit, or Legislative action) is required for the proposed development, the land use approval has been granted and the proposed development is consistent with that land use decision. If the land use approval included conditions of approval, all precedent conditions of approval have been met, and applicant has provided a compliance schedule for meeting the subsequent conditions prior to construction or operation, as may be applicable. A precedent condition is a condition that must be met prior to start of construction of the use or a phase of the use; a subsequent condition is a condition that must be met prior to start of operation of the use or a phase of the use.
3. The building/yard setback, lot area, lot dimension, density, lot coverage, building height and other applicable development standards of the underlying zone and any sub-district(s) are met.
4. Off-street parking and loading-unloading facilities shall be provided as required in Section 4.040 and 4.050 of the Morrow County Zoning Ordinance. Pedestrian access to off-street parking areas shall be provided.
5. [If the subject site is within an interchange influence area as determined by an IAMP, all proposed public or private streets or site access driveways serving the proposed land use shall meet the access management standards found in the IAMP.](#)

6. Unless applicant's use of water is exempt from permitting requirements under Oregon water law, the applicant shall have received all necessary permits or licenses from the Oregon Water Resources Department prior to construction or operation, as applicable. If OWRD water permits or licenses are required for operations, applicant shall provide a compliance schedule for obtaining the required authorization. If an offsite water source is used, applicant shall provide a letter, notice, or memorandum of understanding from the service provider evidencing a commitment to serve the site, which shall indicate the source of the water (e.g. surface water, existing water right, etc.) and a targeted delivery for water to the site.
7. All applicable permits for water, sanitary sewer, wastewater, solid waste, or power services for the site have been granted or Applicant has provided evidence that such services will be provided prior to operation of the use or phase of the use.
8. The site shall not be the subject of outstanding Code Enforcement violations unless the purpose of the application is to rectify an outstanding violation.
9. The applicant shall obtain any required access permit(s) from the Morrow County Public Works Department and/or Oregon Department of Transportation.

**Section 5.010(E):**

E. Submittal Requirements. A Zoning Permit application shall be submitted including all of the following information except for specific items determined at the pre-application review not to be applicable. All zoning permit plans shall have dimensions clearly indicated. An applicant may provide the information on separate sheets, if necessary or desirable for clarity.

1. North arrow and scale.
2. Location of property boundaries, including adjacent public or private streets and rights of way.

3. Location of existing structures and natural features.
4. Areas affected by the proposed development with slopes in excess of 10 percent.
5. Location of existing utilities and facilities, or proposed locations (sewer, water, fire hydrants, electricity, septic system, storm water facilities, etc.).
6. Proposed landscaping.
7. Exterior lighting.
8. Proposed circulation plan for vehicles, pedestrians, and bicyclists, including existing and proposed points of access and sidewalks.
9. Parking lot layout, with circulation plan and striping details.
10. Sign location and details.
11. Evidence to demonstrate compliance with the review standards in subpart (D).
12. For applications for development within the IAMP Overlay Zone (as defined in Article 3): A Trip Generation Estimate identifying the number of anticipated passenger car equivalent trips per day expected to access the site during construction and during regular operations.

Article / Section	Overview of current provisions	Proposed amendments
Article 5, Development Permits, Site Plan Review, Review Criteria	Details the application requirements, review standards, and processes for site plan review.	Add new language as applicable to the new specified IAMP area.

### Section 5.020(E):

E. Review Criteria. Applications processed under this section shall comply with the following criteria, as applicable:

1. The standards listed in MCZO 5.010(D) are, or can be, met.
2. Water is or will be available to the site at a quantity and quality adequate for the proposed use. New developments must either (1) provide an estimated annual water usage, and identify the necessary OWRD authorizations required to serve the estimated water need or (2) submit a letter, notice, or memorandum of understanding from service provider evidencing a commitment to serve the site, which shall indicate the source of the water (e.g., surface water, existing water right, etc.) and a targeted delivery for water to the site.
3. Adequate sewage disposal and wastewater management can be provided for the proposed use as determined by the service provider or by demonstrating compliance with applicable review authority standards, as set forth below. For new developments that will rely on third-party service providers for sewer and/or wastewater disposal, the applicant may satisfy this criterion by submitting a letter, notice, or memorandum of understanding from the service provider evidencing a commitment to serve the site. For new developments that will rely on on-site septic and/or industrial wastewater and/ or non-contact cooling water disposal and/or treatment, the applicant may satisfy this criterion by identifying the necessary ODEQ permits, as required by the state regulations, to be obtained prior to commencement of the proposed use or certificate of occupancy being granted.

4. Applicant's proposed plans for electrical services and solid waste disposal are adequate for the proposed use, as demonstrated by complying with applicable submittal requirements in Section F.
5. Development in hazard areas identified in the Morrow County Comprehensive Plan, Natural Hazard Mitigation Plan, or Community Wildfire Protection Plan shall comply with all applicable requirements.
6. Development shall comply with Section 3.200 Significant Resources Overlay Zone or 3.300 Historic Buildings and Sites protecting inventoried significant natural and historic resources, if applicable.
7. Development in flood plains shall comply with MCZO Section 3.100 Flood Hazard Overlay Zone.
8. Development in the Airport Safety and Compatibility Overlay Zone (ASC) is compliant with the standards and notice requirements identified in Section 3.092.
9. Development in the Interchange Area Management Plan Overlay Zone (IAMP-O) shall comply with MCZO Section 3.125.
10. The transportation system provides for the safe, orderly, and efficient circulation of traffic into and out of the proposed development, and negative impacts to the transportation system are mitigated adequately to achieve consistency with adopted County standards. County transportation facilities shall be located, designed, and constructed in accordance with the design and access standards in the Morrow County Transportation System Plan. This review criterion is satisfied if the applicant has entered into a development and/or mitigation agreement(s) pursuant to ORS 94.504, executed by the Board of Commissioners, under which applicant has agreed to (i) provide mitigation proportional and reasonably related to the traffic impacts caused by the proposed development or (ii) pay a fee-in-lieu of mitigation, equal to the estimated cost of designing and constructing the identified mitigation.

Article / Section	Overview of current provisions	Proposed amendments
Article 9	Hearing and notification requirements.	Add a section which will apply to the new specified IAMP area.

### SECTION 9.055. IAMP OVERLAY ACCESS APPROVAL.

- A. Access to public or private streets within the IAMP Overlay Zone shall be reviewed for consistency with the Access Management Plan and Local Circulation Network.
- B. Approval of access to public or private streets within the IAMP Overlay Zone shall be granted only after joint review by the County and/or ODOT. Coordination of this review will occur pursuant to Section 3.125.
- C. Access approval to public or private streets within the IAMP Overlay Zone is subject to administrative review as described in Section 9.046 when it triggers a zone change or it exceeds 400 Average Daily Trips (ADT) in generated site traffic volume. Administrative review is based on the standards contained in Section 3.125 and the Morrow County TSP. Where the IAMP conflicts with other access and spacing requirements, the IAMP shall govern.

### SECTION 3.125. INTERCHANGE AREA MANAGEMENT PLAN OVERLAY ZONE (IAMP-O)

The purpose of this section is to provide the rules, regulations, and standards governing permissible uses in the Interchange Area Management Plan (IAMP) Overlay Zone (Overlay Zone).

- A. **Boundary of the Overlay Zone.** The boundary of the Overlay Zone is shown on the adopted Comprehensive Land Use Plan Map(s) and Zoning Map.
- B. **Applicability.** The provisions in this Section shall apply to all land use applications for parcels within the Overlay Zone. Any conflict between the standards of the Overlay Zone and those applicable to underlying zones shall be resolved in favor of the Overlay Zone.
- C. **Permitted Land Uses.** Uses allowed in the underlying zoning district are allowed in the Overlay Zone subject to all other applicable provisions in the development code.
- D. **Access Management.** Standards regulating access management in the Overlay Zone shall be as provided in the underlying base zone, except as follows:
  - 1. Full access public and private approaches to the applicable crossroad shall be prohibited within 1,320 feet from all interchange ramp terminals as required by measurement standards prescribed by OAR 734-051-4020(9).
    - a. An exception to this standard is the siting of public right-in, right-out intersections along the interchange crossroad which shall be prohibited within 750 feet from all interchange ramp terminals.
    - b. If a new approach is proposed in the vicinity of an interchange and it cannot be located outside the spacing standard, it shall be located as far from the interchange as practically possible and shall be subject to removal when reasonable alternative access is available as prescribed by OAR 734-051-4020(7).

2. Development shall be required to mitigate their transportation impacts, including but not limited to dedicating right-of-way and making needed access and transportation improvements consistent with the IAMP.
3. Where a land use application or change of use relies on a private connection to a crossroad located within the interchange influence area of a state highway interchange, it shall meet the requirements of OAR 734-051-3020 - *Change of Use of a Private Connection*.

E. **Administration.** The County, in collaboration with ODOT, shall be responsible for monitoring and evaluating vehicle trip generation from development within the Overlay Zone. Performance monitoring shall be carried out through regular tracking of traffic volumes as well as through findings included in Transportation Impact Analyses completed as part of proposed development applications.

1. **Agency Coordination.** The following standards apply to coordination between the County and ODOT:
  - a. Morrow County shall consult ODOT on TIA scope of work when the development proposes access to a state highway or the traffic impacts meet the requirements of Section F.
  - b. Morrow County shall provide written notification to ODOT once the application is deemed complete.
  - c. Morrow County shall provide ODOT 20 days, measured from the date notice to agencies was mailed, to provide written comments to the County. If ODOT does not provide written comments during this 20-day period, the County staff report will be issued without consideration of ODOT comments.
  - d. The County shall invite ODOT to participate in a pre-application conference for land use applications within the IAMP overlay zone.

F. **Transportation Impact Analysis.** Applications for all development proposed within the Overlay Zone shall include a Transportation Impact Analysis (TIA) to demonstrate the level of impact of the proposed development on the interchange and surrounding street system pursuant to all relevant local and state standards. A TIA is required if the proposal is projected to cause one or more of the following effects, which can be determined by field counts, site observation, field measurements, crash history, the Institute of Transportation Engineers Trip Generation manual, and information and studies provided by Morrow County and/or ODOT:

1. An increase in site traffic volume generation by 400 Average Daily Trips (ADT) or more (or as required by the County Engineer). A Trip Generation Estimate identifying the number of anticipated passenger car equivalent trips per day expected to access the site during construction and during regular operations shall be submitted for review. The latest edition of the Institute of Transportation Engineers Trip Generation manual shall be used as standards by which to gauge average daily vehicle trips; or
2. An increase in ADT volume of a particular movement to and from the State highway by 20% or more; or
3. An increase in use of adjacent streets by vehicles exceeding the 20,000 pound gross vehicle weights by 20 vehicles or more per day.
4. The determination of impact or effect and the scope of the TIA shall be coordinated with Morrow County and ODOT. The developer shall be required to mitigate impacts attributable to the project.

G. **Interchange Area Management Plan Review and Update.** The IAMP shall be evaluated for potential needed updates under the following trigger conditions:

1. Plan map and zone changes that have a “significant effect” pursuant to the Transportation Planning Rule (OAR 660-012-0060) and impact relevant interchanges, or that are located within the IAMP Management Area; or

2. An amendment or update to the County's Transportation System Plan; or
3. Forecast operations at interchange ramp terminals exceed the adopted volume-to-capacity mobility targets; or
4. Approval of a development of substantial size (meaning one which generates 400 or more peak hour trips) partially or entirely within the Overlay Zone that is consistent with the underlying zoning, but represents a worst-case trip generation scenario when considering the range of uses allowed in that zoning district; or
5. The County and/or ODOT may request a review of the IAMP at any time if, in their determination, specific land use or transportation changes warrant a review of the underlying assumptions and/or recommendations within the IAMP. If the participants in the IAMP review meeting agree that, once the impacts of the "trigger" that necessitated the review are examined, an IAMP amendment is not warranted, a recommendation of "no action" may be documented and submitted in the form of a letter to the Morrow County Court and the Oregon Transportation Commission.
  - a. If the findings and conclusions from the IAMP review meeting demonstrate the need for an update to the plan, review participants shall initiate an IAMP update process. Initial steps in updating the IAMP shall include scoping the planning process, identifying funding, and outlining a schedule for plan completion. Resulting changes to the IAMP shall be adopted by the OTC as an amendment to the OHP. Once completed, IAMP updates may also necessitate amendments to the Morrow County TSP through the appropriate legislative process.

# **DRAFT I-84 EXIT 159 TOWER ROAD INTERCHANGE AREA MANAGEMENT PLAN**

Morrow County, Oregon

March 2026

Interchange Area Management Plan

# DRAFT I-84 EXIT 159 TOWER ROAD INTERCHANGE AREA MANAGEMENT PLAN

Morrow County, Oregon

Prepared For:

**Oregon Department of Transportation, Region 5**  
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Prepared By:

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Project Analyst: Dhruv Nair

Project No. 27003.041

March 2026



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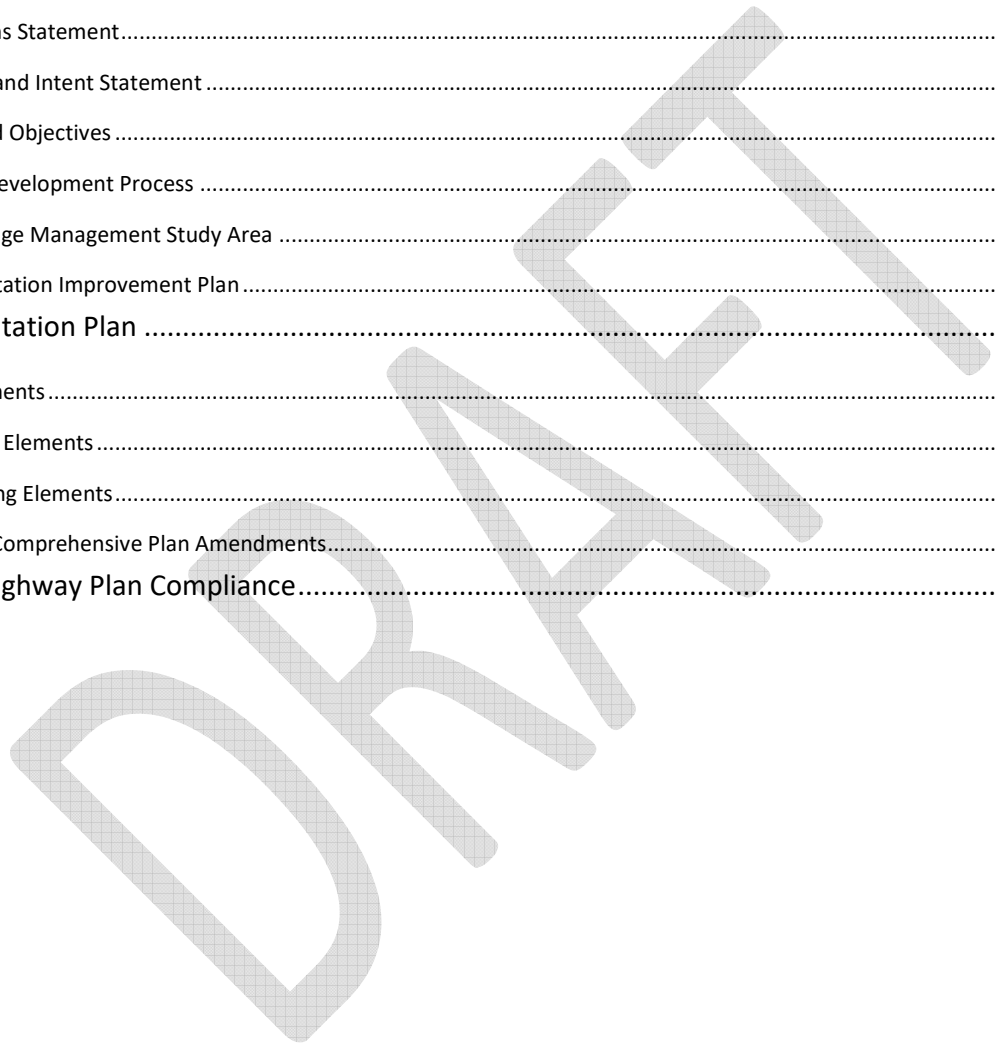
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## Disclaimer

*The inclusion of proposed projects and actions in this plan does not obligate or imply obligations of funds by any jurisdiction for project level planning or construction. The inclusion of proposed projects and actions does serve as an opportunity for projects to be included, if appropriate in the State Transportation Improvement Program (STIP) and the Morrow County capital improvements program but such inclusion is not automatic. It is incumbent on the State, County and general public to take action to encourage and support inclusion into the STIP or CIP at the appropriate time.*

*The planning concepts for the I-84 Exit 159 Tower Road Interchange potentially reduces vehicle-carrying capacity of the highway; further evaluation of the project design will be required at the time of implementation to ensure compliance with ORS 366.215.*

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## PREFACE

The development of this plan was guided by the study's Technical Advisory Committee (TAC) and Public Advisory Committee (PAC). The members of this group are identified below, along with members of the consultant team. They devoted a substantial amount of time and effort to the development of I-84 Exit 159 Tower Road Interchange Area Management Plan (IAMP) and their participation was instrumental in the development of the recommendations that are presented in this plan.

## TECHNICAL ADVISORY COMMITTEE AND PUBLIC ADVISORY COMMITTEE

### ODOT

Teresa Penninger, *ODOT Project Manager*  
Paul Howland  
Lindsey McCullough  
Marlow Stanton  
Dave Warrick  
Kelli Martin  
Brian Wood  
Daniel Fine  
David Boyd  
Abigail Gisler  
Nicole Frankl, *ODOT Rail*

### Morrow County

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Kaitlyn Kennedy  
Eric Imes  
Jeff Wenholz, *Commissioner*  
Steve Freeland, *Emergency Management*  
Steven Davis, *Morrow County Transit*  
Patrick Keeley, *Morrow County Transit*  
Brian Snyder, *Undersheriff*

### Port of Morrow

Jacob Cain

### Boardman Fire and Ambulance

Mike Hughes  
Martin Broadbent

### Boardman Chamber of Commerce

Torrie Griggs

### Bonneville Power Administration

Brian Salois  
Jose Alcocer  
Brent Leslie

### CTUIR Planning Office

Dani Schulte

### City of Boardman

Carla McLane  
Brandon Hammond

### Oregon Military Department

Dominic Kotz  
Joey Medel

### Oregon Department of Aviation

Brandon Pike

### Umatilla Electric Cooperative

Landon Jones

### U.S. Navy

Kim Peacher

### Portland General Electric

Josh Hagel

### Property Owners/Representatives

Scotty Skidmore – Love's Travel Stop  
Jason Tacchini – Amazon Web Services  
Rodrigo Senties Ruiz – Amazon Web Services  
Greg Harris – Threemile Canyon Farms  
Jeff Wendler – Threemile Canyon Farms  
Tim Ogg - Northwest Beef Express  
Lance Jones - Northwest Beef Express  
Mary Falland – CSS Farms  
Alan Orcutt – CSS Farms  
Chris Rodriguez – True Organics  
Elaine Albrich – Percheron Rowan Data  
Mary Killion – Interested Citizen  
David Richards – Interested Citizen

## CONSULTANT TEAM

### Kittelson & Associates, Inc.

Kristine Connoly  
Nick Foster  
Dhruv Nair

### Urbsworks

Marcy McInnelly  
Shelly Denison

## Section 1 Executive Summary

## EXECUTIVE SUMMARY

The I-84 Exit 159 Tower Road Interchange Area Management Plan (IAMP) is a strategic transportation plan designed to ensure growth can occur in the area surrounding the interchange without compromising the long-term function and safety of the interchange area. Exit 159 connects surrounding industrial, agricultural, and commercial uses via Tower Road, while also providing secondary access to Boardman via Kunze Lane. Ongoing and expected development north and south of the interchange triggered the need for this study. This IAMP identifies land use management strategies, short-term and long-term transportation improvements, access management goals, and strategies to fund identified improvements. This planning effort has developed policies, ordinances, and other provisions that will be adopted into the Morrow County Transportation System Plan (TSP). The IAMP will also be approved by the Oregon Transportation Commission (OTC) as an amendment to the Oregon Highway Plan (OHP). This executive summary provides an overview of the project elements that were developed through a collaborative effort of the Technical Advisory Committee (TAC), Public Advisory Committee (PAC), Consultant Team, and local interested parties.

As part of the IAMP process, a transportation improvement plan was developed for the Interchange Management Study Area (IMSA). These improvements are designed to accommodate future growth through a phased implementation approach. The preferred concept involves transforming the interchange into a partial cloverleaf design, with three distinct phasing plans developed based on the rate of development north of I-84:

- No northern development by 2045 - The interchange will feature at-grade railroad crossings and two-way stop control.
- Northern development occurs full 20-year period - Improvements will be phased in gradually, eventually elevating the interchange with roundabouts and a bridge over the railroad.
- Northern development anticipated at a faster rate than Phasing Plan #2 - The interchange elevation and ramp realignments will be built simultaneously to keep pace with demand.

The preferred concept also includes a new bicycle and pedestrian bridge connecting Tower Road to the Heritage Trail at the interchange, expected to be delivered in conjunction with the broader interchange buildout and the future Columbia River Heritage Trail extension.

South of the interchange, improvements are planned for key intersections along Tower Road, including:

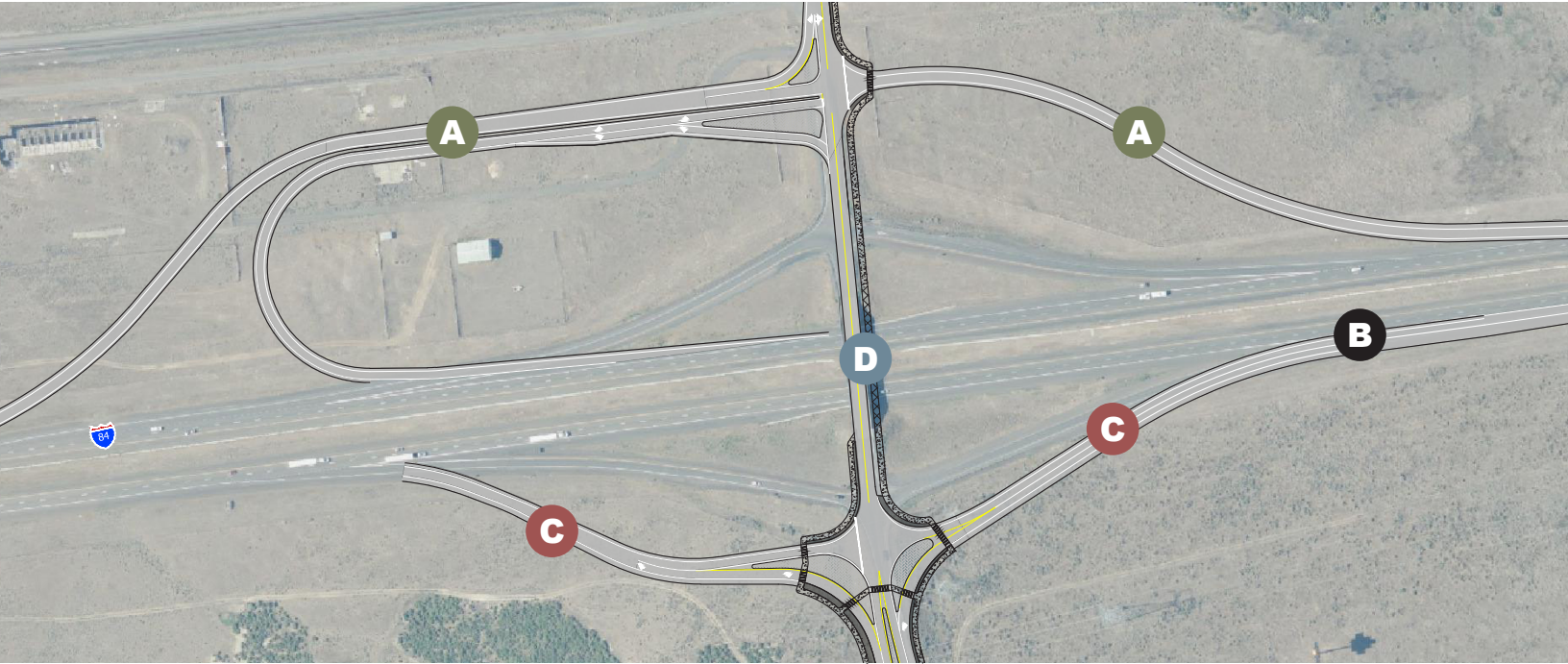
- Widening of Tower Road from the I-84 westbound ramp terminal to south of Boardman Airport Lane
- The option for either roundabouts or traffic signals at Tower Road's intersections with the Love's Southern Driveway, Kunze Lane and Boardman Airport Lane
- Shared-use paths along Tower Road north and south of the interchange, complemented with appropriately placed sidewalks.

The Project Prospectus sheets below provide additional detail on the projects listed above.

## Interchange Phasing Plan #1

### No development north of I-84 anticipated before 2045

**Purpose:** Interchange Phasing Plan #1 outlines the sequencing of components based on the assumption that development north of the interchange is not expected by 2045, with all anticipated growth occurring south of I-84. Under this plan, the interchange will be converted to a partial cloverleaf design by 2045. Due to limited demand north of I-84, the interchange will remain at its current grade and operate with two-way stop control.



#### COMPONENT A

(triggered at approximately 35% of projected 20-year growth)

- Construct westbound loop ramp for traffic exiting I-84, with a channelized right-turn lane at Tower Road ramp terminal intersection.
- Realign existing westbound off-ramp (retained to accommodate over-dimensional loads on I-84).

#### COMPONENT B

(triggered at approximately 60% of projected 20-year growth)

- I-84 EB mainline to be widened to three lanes east of on-ramp to provide adequate merging space.

#### COMPONENT C

(triggered at approximately 65% of projected 20-year growth)

- Realign and extend eastbound ramps with a channelized right-turn lane at Tower Road ramp terminal intersection.
- Construction of Component C will require BPA tower relocation.

#### COMPONENT D

- In coordination with the buildout of improvements on the Tower Road Interchange, construct a new bicycle and pedestrian bridge to enhance recreational access from Tower Road to the Columbia River.

#### OPTION 1

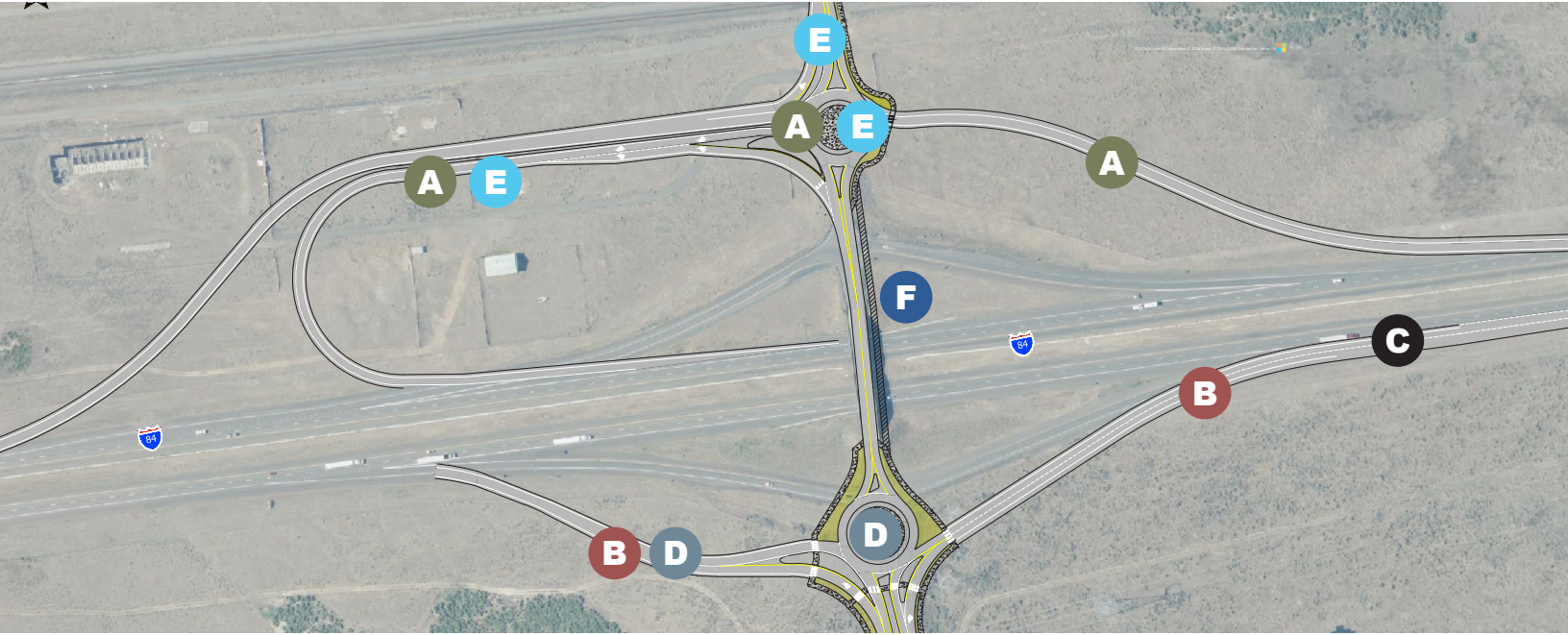
ID	Component	Percentage of 2045 Growth to Trigger Component	Cost Range
A	Westbound Loop Ramp and Ramp Realignment	35%	\$32-37M
B	Additional I-84 Eastbound Through Lane	60%	\$5-6M
C	Eastbound Right-turn Lanes and Ramp Realignment	65%	\$40-46M
D	Pedestrian/Bicycle Bridge	N/A	\$3-4M
Right-of-way Costs			\$15-25M
Total			<b>\$95-118M</b>



## Interchange Phasing Plan #2

### Development north of interchange expected long-term

**Purpose:** Interchange Phasing Plan #2 outlines the sequencing of components under the assumption that anticipated 2045 projected growth north of the interchange will occur over the full 20-year period and components will need to be phased in over time. This phasing results in full build-out of the preferred concept.



**COMPONENT A** (Triggered at approximately 25% of projected 20-year growth)

- Construct loop ramp for westbound traffic exiting I-84 onto Tower Road southbound, with a channelized right-turn lane at Tower Road ramp terminal intersection.
- Realign existing off-ramp (retained to accommodate over-dimensional loads on I-84 and westbound traffic exiting I-84 onto Tower Road northbound).

**COMPONENT B** (Triggered at approximately 40% of projected 20-year growth)

- Realign and extend ramps with a channelized right-turn lane at Tower Road ramp terminal intersection.
- Construction of Component B will require BPA tower relocation.

**COMPONENT C** (triggered at approximately 60% of projected 20-year growth)

- I-84 EB mainline to be widened to three lanes east of on-ramp to provide adequate merging space.

**COMPONENT D** (Triggered at approximately 65% of projected 20-year growth)

- Installation of single lane roundabout at Eastbound ramp terminal intersection.

**COMPONENT E** (Triggered at approximately 65% of projected 20-year growth)

- Addition of single lane roundabout at Westbound ramp terminal intersection on Tower Road.
- Raise ramps to match bridge height.
- Construct an overpass spanning the railroad right-of-way to access parcels north of I-84.

**COMPONENT F**

- In coordination with the buildout of improvements on the Tower Road Interchange, construct a new bicycle and pedestrian bridge to enhance recreational access from Tower Road to the Columbia River.

#### OPTION 2

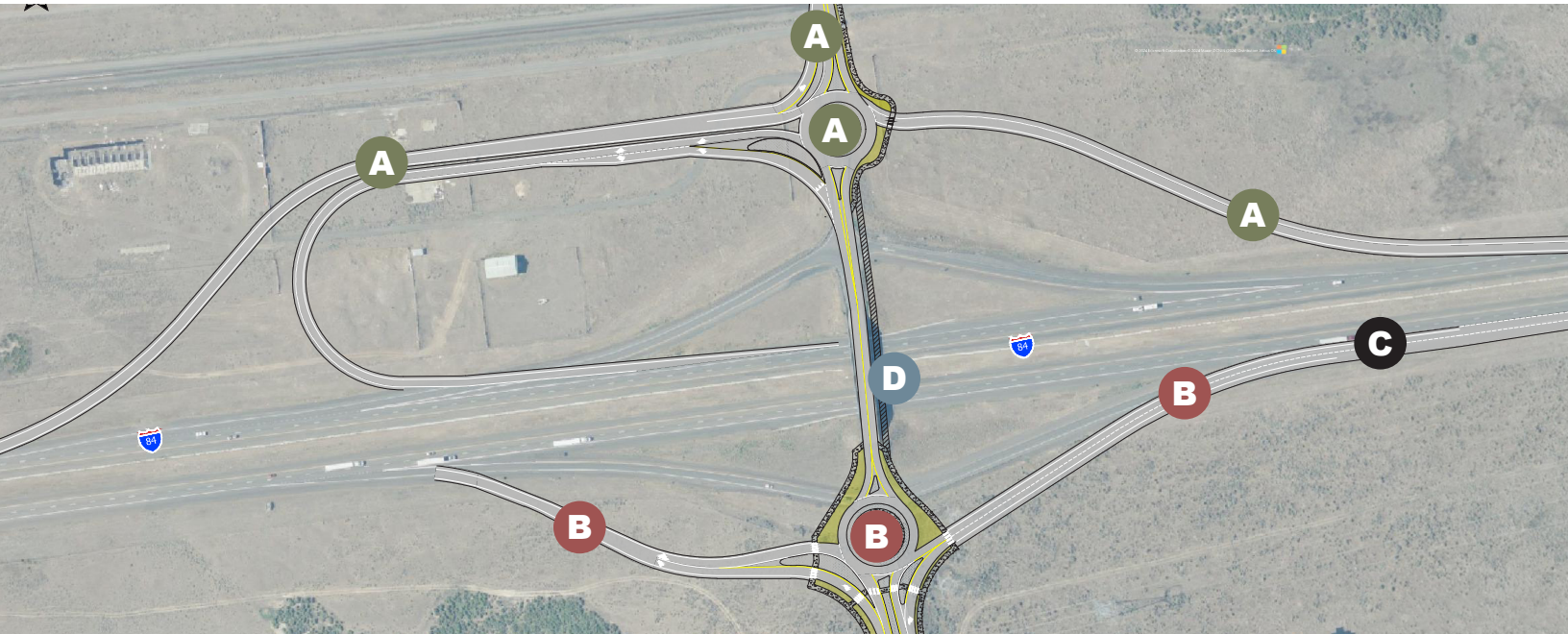
ID	Component	Percentage of 2045 Growth to Trigger Component	Cost Range
A	Westbound Loop Ramp and Ramp Realignment	25%	\$32-37M
B	Eastbound Right-turn Lanes and Ramp Realignment	40%	\$40-46M
C	Additional I-84 Eastbound Through Lane	60%	\$5-6M
D	Eastbound Roundabout	65%	\$9-11M
E	Westbound Raised Interchange, Roundabout and Bridge over Railroad	65%	\$70-80M
F	Pedestrian/Bicycle Bridge	N/A	\$3-4M
Right-of-way Costs			\$15-25M
Total			<b>\$174-209M</b>



## Interchange Phasing Plan #3

Development north of interchange expected near-term

**Purpose:** Interchange Phasing Plan #3 outlines the phasing of components under the assumption that anticipated 2045 projected growth north of the interchange occurs at a faster rate than in Phasing Plan #2 and the preferred concept is built in two phases.



### COMPONENT A

(Triggered at approximately 25% growth)

- Construct loop ramp for westbound traffic exiting I-84 onto Tower Road southbound, with a channelized right-turn lane at Tower Road ramp terminal intersection.
- Realign existing off-ramp (retained to accommodate over-dimensional loads on I-84 and westbound traffic exiting I-84 onto Tower Road northbound).
- Add single lane roundabout at ramp terminal intersection.
- Construct overpass, spanning the railroad right-of-way to access parcels north of I-84.

### COMPONENT B (Triggered at approximately 40% of projected 20-year growth)

- Realign, raise and extend eastbound ramps with a channelized right-turn lane at Tower Road ramp terminal intersection.
- Add single lane roundabout at eastbound ramp terminal intersection.
- Construction of Component B will require BPA tower relocation.

### COMPONENT C

(triggered at approximately 60% of projected 20-year growth)

- I-84 EB mainline to be widened to three lanes east of on-ramp to provide adequate merging space.

### COMPONENT D

- In coordination with the buildout of improvements on the Tower Road Interchange, construct a new bicycle and pedestrian bridge to enhance recreational access from Tower Road to the Columbia River.

#### OPTION 3

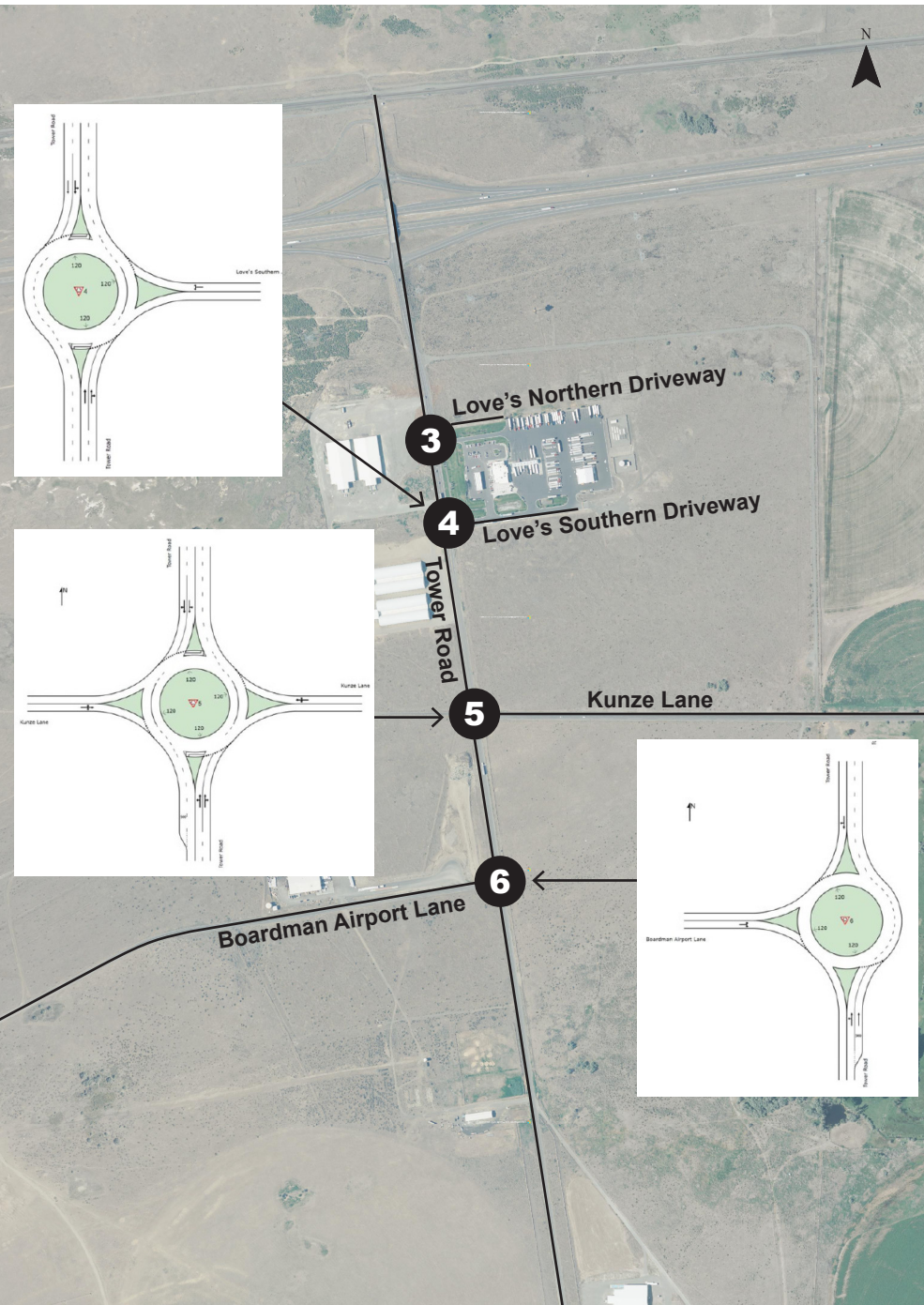
ID	Component	Percentage of 2045 Growth to Trigger Component	Cost Range
A	Westbound Loop Ramp, Ramp Realignment, Roundabout and Raised Interchange	25%	\$102-117M
B	Eastbound Right-turn Lanes, Ramp Realignment	40%	\$41-47M
C	Additional I-84 Eastbound Through Lane	60%	\$5-6M
D	Pedestrian/Bicycle Bridge	N/A	\$3-4M
Right-of-way Costs			\$15-25M
Total			<b>\$166-199M</b>



## Tower Road, South of Interchange - Option #1

### Roundabouts at Southern Intersections

**Purpose:** To accommodate anticipated growth south of the interchange, Option #1 includes roundabouts along Tower Road at its intersections with the Love's Southern Driveway, Kunze Lane, and Boardman Airport Road, as well as widening of Tower Road from the I-84 westbound ramp terminal to south of the Boardman Airport Lane intersection.



Tower Road will be widened to four lanes between the southern I-84 ramp terminal and Kunze Lane, tapering to three lanes between Kunze Lane and Boardman Airport Road.

**Love's Northern Driveway** – This intersection remains a right-out only driveway onto Tower Road.

**Love's Southern Driveway** – A roundabout will be constructed at the Tower Road/Love's southern driveway intersection.

**Kunze Lane** – A roundabout will be constructed at the Tower Road/Kunze Lane intersection.

**Boardman Airport Lane** – A roundabout will be constructed at the Tower Road/Boardman Airport Lane intersection. South of the intersection, Tower Road will transition from three lanes to two lanes.

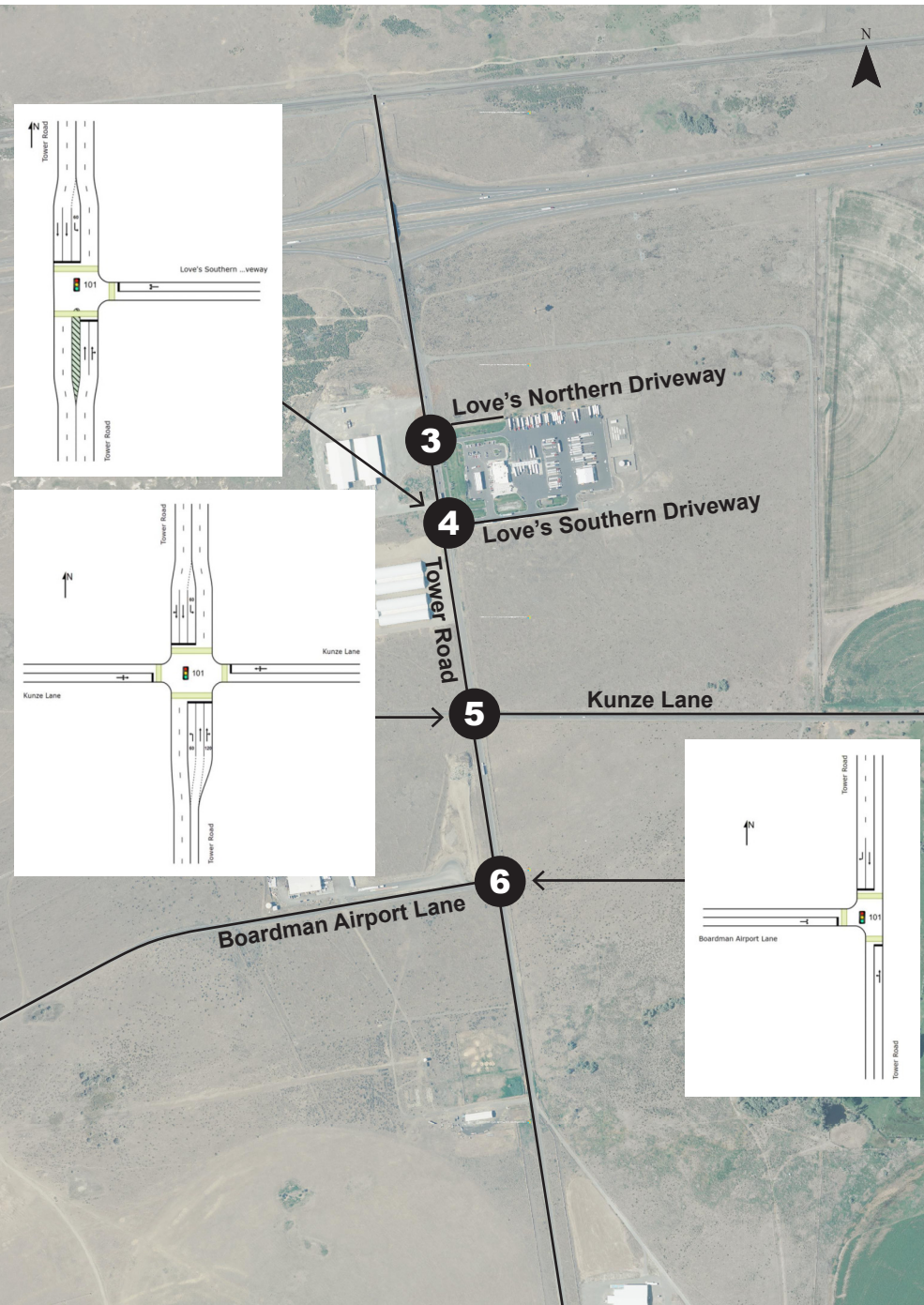
SOUTH OF INTERCHANGE - OPTION #1 (ROUNDBOUTS)		
ID	Intersection	Cost Range
4	Tower Road/Love's Southern Driveway	\$5-6M
5	Tower Road/Kunze Lane	\$8-9M
6	Tower Road/Boardman Airport Lane	\$7-8M
N/A	Tower Road Roadway Widening	\$6-7M
	<b>Total</b>	<b>\$26-30M</b>



## Tower Road, South of Interchange - Option #2

### Signalization at Southern Intersections

**Purpose:** To accommodate anticipated growth south of the interchange, Option #2 includes traffic signals and roadway widening along Tower Road at its intersections with the Love's Southern Driveway, Kunze Lane, and Boardman Airport Road, as well as widening of Tower Road from the I-84 westbound ramp terminal to south of the Boardman Airport Road intersection.



Tower Road will be widened to four lanes between the southern I-84 ramp terminal and Kunze Lane, tapering to three lanes between Kunze Lane and Boardman Airport Road.

**Love's Northern Driveway** – This intersection remains a right-out only driveway onto Tower Road.

**Love's Southern Driveway** – A traffic signal will be installed at the Tower Road/Love's southern driveway intersection, along with a dedicated southbound left-turn lane.

**Kunze Lane** – A traffic signal will be installed at the Tower Road/Kunze Lane intersection, along with dedicated southbound and northbound left-turn lanes.

**Boardman Airport Lane** – A traffic signal will be installed at the Tower Road/Boardman Airport Lane intersection. The outer southbound lane transitions into an exclusive right-turn lane between Kunze Lane and Boardman Airport Lane.

SOUTH OF INTERCHANGE - OPTION #2 (SIGNALS)		
ID	Intersection	Cost Range
4	Tower Road/Love's Southern Driveway	\$5-6M
5	Tower Road/Kunze Lane	\$8-9M
6	Tower Road/Boardman Airport Lane	\$7-8M
N/A	Tower Road Roadway Widening	\$6-7M
<b>Total</b>		<b>\$26-30M</b>



Section 2  
Interchange Improvement and Access Management Plan

# INTERCHANGE IMPROVEMENT AND ACCESS MANAGEMENT PLAN

## BACKGROUND

Per Morrow County's zoning map, there are over 21,000 acres of land zoned for industrial or commercial uses, the majority of which remain undeveloped. Additionally, north of the interchange there is approximately 2,253 acres zoned General Industrial (M-G) and 14 acres zoned Public (PUB) ready for potential development (Reference 1). Due to the lack of proximity to nearby interchanges, these properties rely on the Tower Road interchange as their primary I-84 access point. Future development, including several approved, but unbuilt, data centers will directly impact operations at the interchange. Furthermore, the proximity of the adjacent railroad line introduces additional access and logistical considerations for the parcels located north of the interchange.

## CONDITIONS STATEMENT

The I-84 Exit 159 Tower Road interchange is located in Morrow County, west of the City of Boardman city limits and outside of the City of Boardman urban growth boundary. It provides access via Tower Road to industrial, agricultural, and highway-oriented uses (e.g., the Boardman Airport, Love's Truck Stop, Threemile Canyon Farms Dairy, PGE cogeneration plant, and the US Navy bombing range) on the south side of I-84. It also provides secondary access to Boardman via Kunze Lane. Additionally, to the north of the interchange is primarily undeveloped and includes the Union Pacific Railroad and Oregon Department of Fish and Wildlife's Columbia River Regulated Hunt Area. Tower Road is classified by Morrow County as a major collector (Reference 2).

## PURPOSE AND INTENT STATEMENT

The I-84 Exit 159 Tower Road IAMP is a strategic transportation plan to protect the long-term function and safety of the interchange as the area around it develops. Potential development north and south of the interchange is the primary driving force behind the need for this study. The IAMP identifies land use management strategies, short- and long-term transportation improvements, access management goals, and strategies to fund identified improvements. The intent is that this planning effort results in policies, ordinances, and other provisions that will be adopted into the Morrow County Transportation System Plan (TSP). The IAMP will also be approved by the Oregon Transportation Commission (OTC) as an amendment to the Oregon Highway Plan (OHP).

## GOALS AND OBJECTIVES

The primary goal of the IAMP process is to protect the function of the interchange for the next 20 years while accounting for changes in land use and traffic patterns. As stated in Policy 3C of the 1999 Oregon Highway Plan, "it is the policy of the State of Oregon to plan for and manage grade-separated interchange

areas to ensure safe and efficient operation between connecting roadways.” To this end, the following draft objectives have been developed based on this goal and the scope of work for this project:

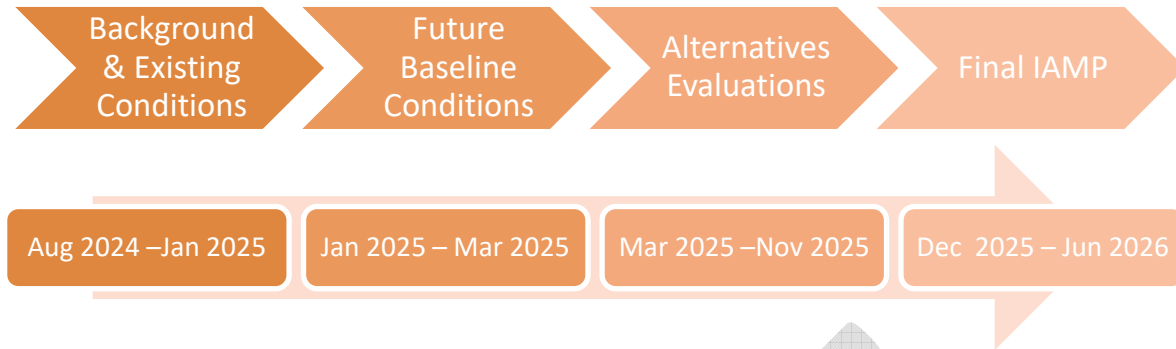
1. Consider the surrounding contextual land use and roadway network;
2. Consider pedestrian and bicycle connectivity in analysis area of the interchange;
3. Provide for efficient connectivity, right-of-way, and access control in the analysis area of the interchange;
4. Refine and prioritize improvements needed to maintain acceptable traffic operations at the interchange while providing safe access to adjacent land uses;
5. Provide plans for improved local street connectivity in the Project area while limiting cul-de-sacs or other non-connected roads;
6. Evaluate existing and potential land use designations, overlay zones, intensities, conditions, and actions that could have favorable effect on the facility or an adverse effect on the facility;
7. Include implementation policies to be adopted into the County comprehensive plans, transportation system plans, interchange access standards, and zoning ordinances, as appropriate; and
8. Develop alternatives that consider the surrounding topographical context, environmental impacts, construction cost, and potential phasing strategies.

These objectives were reviewed with and confirmed by members of the study’s Technical Advisory Committee (TAC) and Public Advisory Committee (PAC).

## PROJECT DEVELOPMENT PROCESS

This project was guided by the TAC, PAC, and the general public, including local freight users. The TAC, PAC, and the public provided input throughout the project process through a project website, online surveys, virtual interviews with freight providers and businesses along Tower Road and virtual and in-person meetings with the TAC/PAC. The ODOT Mobility Advisory Committee (MAC) reviewed the final concepts. These steps and their results were documented through Technical Memoranda, public involvement summaries, MAC meeting notes and in this IAMP. The topics explored and documented in the background documentation summary provided in Table 1. Figure 1 summarizes the project development process. *Technical Memoranda are attached in Appendix A.*

**Figure 1 Project Development Process**



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**Table 1: Background Documentation Summary**

Background Document	Summary
Methodology Memorandum	This memorandum documents the methodology and assumptions associated with the existing and future transportation conditions and alternatives analyses for the Exit 159 Tower Road IAMP.
TM #1: IAMP Definition and Background	This memorandum provides an overview of the definition and background for the IAMP. It describes the project purpose and background and the proposed goals, objectives, evaluation criteria, and study area boundary. Appendix A in TM #1 includes a review of existing plans, policies, strategies, and codes applicable to the project.
TM #2: Existing Conditions: System Inventory	This memorandum provides a review of existing land uses, transportation facilities, and demographic data within the vicinity of the I-84 Exit 159 Tower Road interchange. The information in this memorandum informs the identification of various opportunities and constraints for meeting the goals and objectives of the IAMP.
TM #3: Existing Conditions: Transportation System Operations	This memorandum describes current transportation system operations and safety conditions within the vicinity of the I-84 Exit 159 interchange. The information in this memorandum provides a basis for comparison with future growth projections in TM #4 and informs the identification of various opportunities and constraints for meeting the goals and objectives of the IAMP.
TM #4: Future Baseline Conditions: Transportation System Operations	This memorandum describes future land-use and traffic growth projections and future traffic operations within the vicinity of the I-84 Exit 159 interchange. The information in this memorandum provides a basis for the development and analysis of potential project alternatives. It informs the identification of various opportunities and constraints for meeting the goals and objectives of the IAMP.
TM #5: Detailed Evaluation of Select Concepts	This memorandum describes and evaluates interchange and local circulation improvement concepts developed to provide for long-term growth in the vicinity of the I-84 Exit 159 interchange. It describes the set of eleven preliminary concepts developed by the project team based on input from the TAC/PAC. It documents the project team's screening of these concepts and feedback received from the advisory committees and general public. Based on this screening, the Project Management Team selected five concepts to move forward for more detailed evaluation (which included system operations and safety effects, bicycle and pedestrian considerations, cost estimates, and access management).
TM #6: Preferred Concept	This memorandum documents the evaluation of the preferred interchange and local circulation improvement concept developed for the I-84 Exit 159 IAMP. It describes and illustrates the fundamental components of the preferred concept, provides the system operations and safety effects of the preferred concept, and includes refined planning-level cost estimates. It also describes the access management plan.
TM #7: Implementing Actions	This memorandum describes the implementation actions for the I-84 Exit 159 IAMP including amendments to Morrow County's Comprehensive Plan, Transportation System Plan, Zoning Map and Zoning Ordinance.
Ordinance and Code Change Memorandum	This memorandum provides adoption-ready code changes and supporting ordinances to implement within the IAMP to ensure that County land use policies and transportation regulations are coordinated to protect facility function and corridor operations over time.
Public Involvement Summary	The public involvement summary documents public feedback gathered through an online survey, two PAC meetings, interviews with businesses and freight providers along Tower Road, and a project website that provided updates and allowed for public comment submission.
Morrow County Planning Commission (PC) and County Commission (CC) Joint Work Session Meeting Notes	The Morrow County PC and CC Joint Work Session is scheduled on March 31 2026. Work Session meeting notes will document the discussion with the PC and CC on the draft IAMP.
Mobility Advisory Committee (MAC) Meeting Notes	The MAC meeting is scheduled on April 9 2026. MAC meeting notes will document the discussion with the MAC on the preferred concept.

## INTERCHANGE MANAGEMENT STUDY AREA

To ensure a comprehensive and effective analysis, the IMSA encompasses developable and redevelopable properties, as well as major roadways, that could significantly influence interchange operations over the next 20 years. At a minimum, the IMSA includes all properties and access points within one-half mile of the existing interchange, consistent with IAMP Guidelines. Figure 2 below shows the IMSA limits.

## TRANSPORTATION IMPROVEMENT PLAN

A comprehensive transportation improvement plan for the I-84 Exit 159 Tower Road IMSA was developed based on the concept screening and evaluations outlined in the Technical Appendix. Through this process, it was determined that the preferred concept would likely need to be implemented in phases since the timing, location, and scale of future development will trigger different aspects of the plan and funding constraints will likely preclude building all elements of the project at once. The transportation improvements identified for the IMSA are described below.

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- Interchange Management Study Area
- Boardman Urban Growth Boundary
- Minimum 1320' IAMP Limits
- Operations/Access Study Area

Railroads



Figure 2

## I-84 Tower Road Interchange

Phasing of the preferred concept will primarily depend on the location and scale of future development. Additional factors, such as roadway and intersection capacity, as well as funding availability, will also influence the timing of phased implementation. Some components may be constructed as funding becomes available, while others may be triggered by broader regional growth or more immediate development near the interchange.

Currently, nearly all traffic through the interchange is related to development south of the interchange. There is development potential north of the interchange; however, there are no paved public roads north of the railroad and access is constrained to these parcels due to the railroad and I-84. Therefore, development north of I-84 may occur later than further development south of I-84. Considering that development north of I-84 would generate different traffic patterns than development south of I-84, three interchange phasing plans were developed to account for varying levels of development north of I-84:

- Interchange Phasing Plan #1 – No development north of I-84
- Interchange Phasing Plan #2 – Development north of I-84 expected long-term
- Interchange Phasing Plan #3 – Development north of I-84 expected near-term

Each plan identifies phasing triggers and planning-level cost breakdowns for the fundamental components of the preferred concept. The phasing triggers are based on the percentage of total growth projected in Technical Memorandum #4 at which a study intersection is expected to fail to meet ODOT's mobility targets.

### ***Interchange Phasing Plan Option #1 – No development north of I-84 anticipated before 2045***

Interchange Phasing Plan #1 outlines the phasing order of components under the assumption that anticipated 2045 projected growth within the study area does not occur north of I-84. Under this phasing plan:

- The interchange will ultimately be modified into a partial cloverleaf interchange with two-way stop control at both ramp terminals to accommodate projected growth
- Given the lack of demand north of I-84, the built-out interchange will feature a railroad crossing that will remain at-grade
- Additionally, as growth occurs, to provide adequate merging space eastbound along I-84, the plan features an additional through lane beginning at the interchange on-ramp.

*Greater detail on the fundamental components of this phasing plan are detailed in sheet 1 of the Project Prospectus Sheets.*

### ***Interchange Phasing Plan Option #2 – Development north of interchange expected long-term***

Interchange Phasing Plan #2 outlines the sequencing of components under the assumption that anticipated 2045 projected growth north of the interchange will occur over a longer timeframe and components will need to be phased in over time. This phasing results in full buildout of the preferred concept. Under this phasing plan:

- Phasing begins with the realignment of ramps and construction of a westbound loop ramp before the existing lane configuration fails ODOT mobility targets. These initial ramp realignments will be constructed to meet Tower Road at its existing grade.
- To ensure adequate merging distance along I-84 eastbound, a supplemental through lane will be extended from the interchange on-ramp.
- Once the new configuration no longer meets mobility targets, a bridge over the railroad will be constructed, with the interchange then elevated to match the height of the new structure and roundabouts constructed at both ramp terminals to accommodate the increased traffic volumes generated by full buildout of growth north of I-84.

*Greater detail on the fundamental components of this phasing plan are detailed in sheet 2 of the Project Prospectus Sheets.*

### ***Interchange Phasing Plan Option #3 – Development north of interchange expected near-term***

Interchange Phasing Plan #3 outlines the phasing of components under the assumption that anticipated 2045 projected growth north of the interchange occurs at a faster rate than in Plan #2. This results in fewer construction phases. In contrast to Plan #2, Plan #3 elevates the interchange concurrently with the ramp terminal realignments, accommodating growth north of I-84 through the construction of roundabouts at both ramp terminals and a bridge over the railroad. *Greater detail on the fundamental components of this phasing plan are detailed in sheet 3 of the Project Prospectus.*

### **Tower Road South of the Interchange**

To support anticipated growth south of the interchange, roundabouts and traffic signals were evaluated at the Tower Road intersections with Love's Southern Driveway, Kunze Lane, and Boardman Airport Lane, along with widening Tower Road and these intersections to accommodate future traffic volumes. Both control types are expected to provide safety and operational benefits relative to existing conditions. Roundabouts are assumed in the preferred concept; however, traffic signals are also expected to meet the County's operational target. Morrow County will ultimately determine which intersection control type to implement based on future analyses as development occurs. Sheets 4 and 5 of the *Project Prospectus Sheets* provide further detail on transportation improvements south of the I-84 Exit 159 Interchange along Tower Road.

## Bicycle and Pedestrian Considerations

Currently there is a sidewalk along the Love's Truck Stop frontage on Tower Road. Apart from the sidewalk along Love's Truck Stop, there are no existing dedicated pedestrian, bicycle, or transit facilities within the study area. People walking and biking in the study area must use the limited shoulders along Tower Road and Kunze Lane or walk or bike in the travel lanes. In many locations along these roadways, the paved shoulder is less than 4 feet wide and the adjacent terrain is dirt or gravel. The traffic counts conducted did not capture any existing pedestrian or bicycle traffic within the study area.

The preferred concept includes shared-use paths on Tower Road north and south of the interchange, extending from Kunze Lane to the I-84 westbound ramp terminal and north from the I-84 eastbound ramp terminal, complemented by appropriately placed crosswalks. Since the existing Tower Road bridge over I-84 will be preserved, a new bicycle and pedestrian bridge will be constructed to connect Tower Road to the planned Columbia River Heritage Trail, anticipated to be delivered in conjunction with the broader Tower Road interchange buildout.

## Access Management Plan

Access locations within the Exit 159 Operations and Access Study Area (OASA) were evaluated based on ODOT's Division 51 Access Management standards and an assessment of traffic operations and safety as described in Action 3C.3 of the Oregon Highway Plan. Under ODOT's current access management policy, OAR 734-051-4020 stipulates that the desired distance between an interchange ramp terminal and the first full approach (public or private) on the crossroad should be a minimum of 1,320 feet (¼-mile). The first right-in/right-out access for a rural interchange should also be a minimum of 1,320 feet from the ramp terminal.

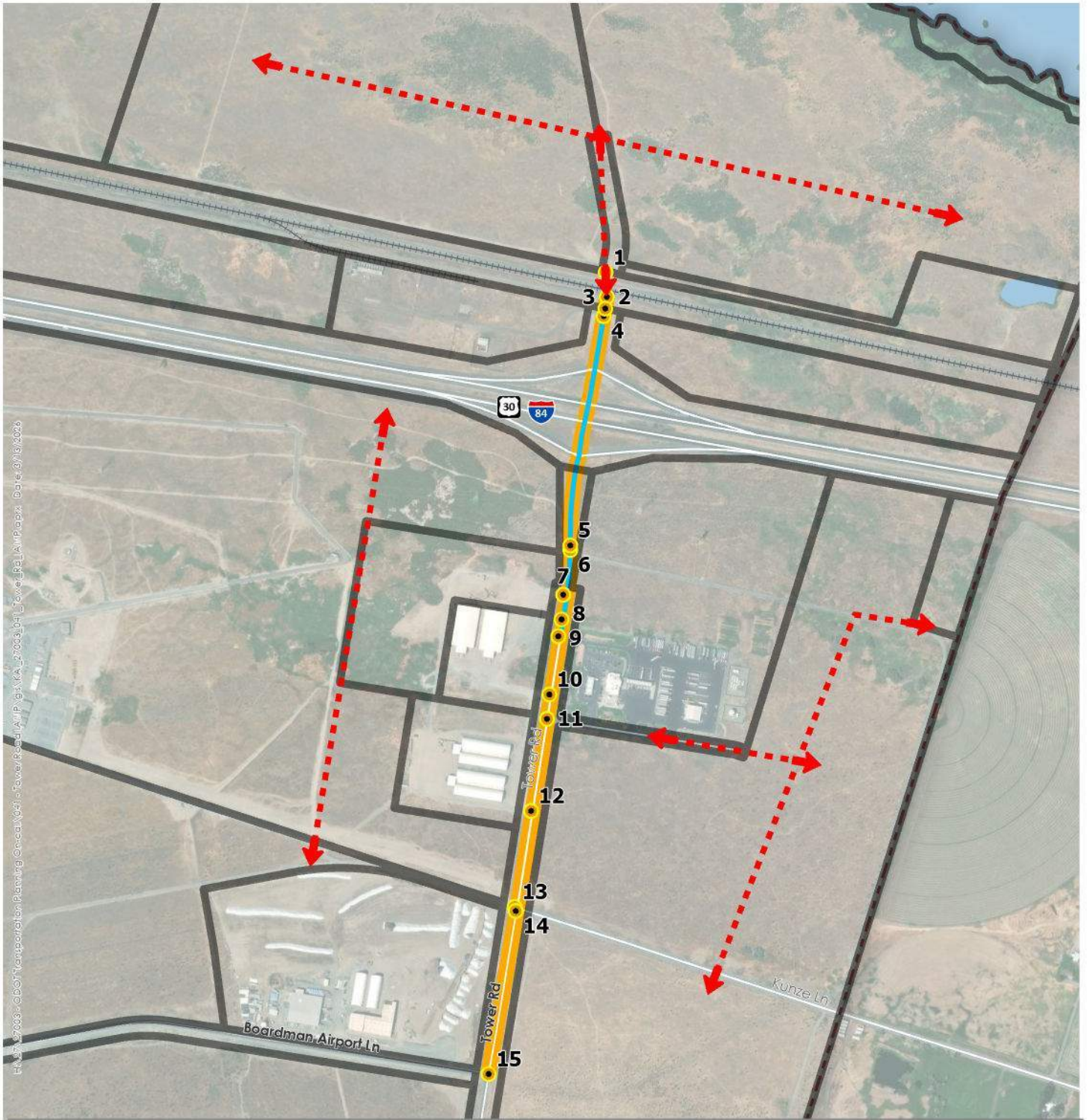
It may not be possible for certain accesses to meet ODOT's access spacing standards due to property boundary constraints. Therefore, the Access Management Plan is written with the objective of moving as close as possible to the standards. The plan aims to move access locations in the OASA towards ODOT's access spacing standards through:

- Constructing local streets that access Tower Road at least ¼-mile from the relocated interchange ramp terminal intersections on Tower Road (all road locations shown in Figure 3 are conceptual and final locations will be determined as they are constructed, which may occur through the development process or by the County constructing them). Properties currently accessing Tower Road will instead access these local streets and their Tower Road access will be removed when alternative access is available.
  - The local street networks envisioned in Figure 3 will need to provide access to all parcels adjacent to Tower Road.
- Extending Tower Road north of I-84 and relocating accesses along this extension at least ¼-mile from the relocated interchange ramp terminal intersections on Tower Road.
- Purchasing properties and closing access.

Some of these access changes would need to be implemented with the interchange reconfiguration and others are anticipated to occur over time as properties develop or redevelop. As Figure 3 shows, there are 15 accesses within the OASA. Table 2 summarizes the proposed access management plan for the Exit 159 OASA for accesses located within ODOT's ¼-mile spacing standard or that may need to be modified to meet operational and safety performance standards. Accesses bolded are located within ¼ mile of the interchange ramp terminals.

**Table 2: Access Management Plan for Exit 159 Interchange**

Access #	Roadway	Approach Type	Side of Roadway	Access Width (ft)	Proposed Access Management Plan Action Under Preferred Concept
1	Tower Rd	Private	North	19	Access will be relocated to Tower Road extension 1,320 feet from the interchange.
2	Tower Rd	Private	West	22	Access will be relocated to Tower Road extension 1,320 feet from the interchange
3	Tower Rd	Private	East	14	Access closed through property purchase.
4	Tower Rd	Private	West	40	Access to be closed through property purchase.
5	Tower Rd	Private	West	50	Close access when local road network is constructed.
6	Tower Rd	Private	East	25	Close access when local road network is constructed.
7	Tower Rd	Private	West	60	Close access when local road network is constructed.
8	Tower Rd	Private	East	37	Close access when local road network is constructed.
9	Tower Rd	Private	East	26	Continue as right-out only access until property redevelops. Close access when property redevelops.
10	Tower Rd	Private	West	60	Access will be closer than ¼-mile when preferred concept is fully built out. Close access when local road network is constructed.
11	Tower Rd	Public	East	40	Access may be closer than ¼-mile when preferred concept is fully built out. In this case, consider restricting to right-in/right-out/left-in when local road network is constructed or relocating access when adjacent properties develop.
12	Tower Rd	Private	West	45	No changes are proposed to accesses located outside ODOT ¼-mile spacing standard.
13	Tower Rd	Private	West	25	
14	Tower Rd	Public	East	40	
15	Tower Rd	Public	West	40	



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- Access Location - Driveway or Public Street
- Minimum 1320' IAMP Limits
- Operations/Access Study Area
- Proposed Conceptual Local Circulation Network

- Railroads
- Interchange Management Study Area
- Boardman Urban Growth Boundary
- Taxlot Boundaries

0 500 1,000 US Feet



Figure 3

### Proposed Access Management Plan and Local Circulation Network Morrow County, Oregon

### ***Railroad Maintenance Access***

The current driveways used to access the railroad for maintenance purposes will be closed per this access management plan. Further coordination will be needed with the rail operator to determine alternative maintenance access. This connection should be a new access located at least ¼-mile from the relocated interchange ramp terminal intersections on Tower Road. If this is infeasible, a gated access used only for maintenance purposes within the ¼-mile spacing may be considered.

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Section 3  
Implementation Plan

## IMPLEMENTATION PLAN

This section describes the IAMP implementation strategy, which includes an Interchange Function and Policy Definition and Management Area for the interchange. The Implementation Plan also includes adoption and monitoring procedures to help guide the timing of transportation improvements so that they are constructed and funded as development occurs and that the improvement plan is updated as needed over time.

To ensure that the IAMP remains dynamic and responsive to changes to the adopted land use and transportation plans, the following actions at the State and local level are recommended:

- The County will need to amend its Comprehensive Plan to define the function and purpose of the interchange. The purpose and intent statement from Technical Memorandum #1 can serve as the framework for policies guiding future land use and transportation decisions.
- The Morrow County Transportation System Plan (TSP) will be amended to incorporate the IAMP's recommended improvements and access management requirements by reference.
- The Morrow County Zoning Map will be amended to include an Interchange Overlay District that identifies areas where special development requirements or land use restrictions are necessary to implement the IAMP's preferred alternative.
- The Morrow County Zoning Ordinance will be amended to implement the Interchange Overlay District, including items related to protecting the function of the interchange, access management, and transportation impact analysis requirements.

## PLAN ELEMENTS

In addition to adoption of the IAMP, implementation of this IAMP requires adoption of an "Interchange Function and Policy Definition" and IAMP Management Area.

### Interchange Function and Policy Definition

Morrow County should adopt a clear definition of the function of the Exit 159 interchange into the comprehensive plan and TSP as a policy to provide direction for management of the interchange area and achieve the objectives and goals of this IAMP. This will help maintain consistency between future policy decisions and the interchange's intended function.

As described earlier in the IAMP, the planning process was guided by a purpose and intent statement that identified expected project outcomes. Project objectives included considering surrounding land use context and the roadway network, evaluating pedestrian and bicycle connectivity within the interchange analysis area, and providing for efficient connectivity, right-of-way, and access control. The project sought to refine and prioritize improvements needed to maintain acceptable traffic operations at the interchange while ensuring safe access to adjacent land uses, improve local street connectivity while limiting cul-de-sacs and non-connected roads, and evaluate existing and potential land use designations and overlay zones that could affect facility function. Additionally, the project aimed to develop

alternatives that considered topographical context, environmental impacts, construction costs, and potential phasing strategies, while identifying implementation policies for adoption into the County's comprehensive plans, transportation system plans, interchange access standards, and zoning ordinances.

Based on these objectives, the following function and policy definition was developed for the Exit 159 Interchange:

*“The primary function of the I-84 Exit 159 interchange is to provide access via Tower Road to the surrounding industrial, agricultural, and commercial uses. Secondly, it provides access to Boardman via Kunze Lane.”*

## ADOPTION ELEMENTS

Implementation of the IAMP will occur at both the County and State levels of government. As required by OAR 734-051, Morrow County will be required to amend its TSP and Comprehensive Plan to incorporate elements of the Exit 159 Tower Road IAMP. In addition, new ordinances, or amendments to existing ordinances will be required to ensure that the access management, land use management, and coordination elements of the IAMP are achieved. This adoption process will include Planning Commission and County Council hearings.

Following successful adoption at the County level, the I-84 Exit 159 Tower Road IAMP will be presented to the Oregon Transportation Commission (OTC) for its review and approval. This should occur prior to transportation improvements as described in this IAMP being constructed.

To implement the I-84 Exit 159 Tower Road IAMP, the following actions must occur:

1. Morrow County adopts the IAMP as part of the Comprehensive Plan and TSP by incorporating the IAMP by reference into the TSP. This ensures that the access management plans, phasing strategies, and project lists become legislatively-approved policy documents that guide future improvements and local land-use approvals.
2. Morrow County amends its Comprehensive Plan and Zoning Maps and establishes a mapped IAMP Management Area (IAMP Overlay District) to formally identify the geographic areas where compliance with the IAMP is a required condition for future development approval.
3. Morrow County amends its Zoning and Subdivision Ordinances to incorporate the overlay district and add access management requirements and ODOT notification requirements.
4. The Oregon Transportation Commission shall amend the Oregon Highway Plan to include the I-84 Exit 159 Tower Road IAMP

## MONITORING ELEMENTS

The purpose of the IAMP is to ensure that capacity at the interchange is preserved for its intended function. While a long-range plan, the IAMP needs to remain dynamic and responsive to development and changes to the adopted land use and transportation plans and may need to be periodically reviewed

and updated. To accomplish this goal, a monitoring program is included that identifies triggers for reviewing the IAMP and assessing how development approval within the IAMP Management Area will be reviewed and coordinated.

### IAMP Review Triggers

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

- Transportation Analysis - Applications for all development proposed within the Overlay Zone shall include a Transportation Impact Analysis (TIA) to demonstrate the level of impact of the proposed development on the interchange and surrounding street system pursuant to OAR 734-051. A TIA is required if the proposal is projected to cause one or more of the following effects, which can be determined by field counts, site observation, field measurements, crash history, the Institute of Transportation Engineers Trip Generation manual, and information and studies provided by the reviewing jurisdiction and/or ODOT:
  - An increase in site traffic volume generation by 400 Average Daily Trips (ADT) or more (or as required by the County Engineer). The latest edition of the Institute of Transportation Engineers Trip Generation manual shall be used as standards by which to gauge average daily vehicle trips; or
  - An increase in use of adjacent streets by vehicles exceeding 20,000-pound gross vehicle weights by 20 vehicles or more
  - The location of the access driveway does not meet minimum intersection sight distance requirements or located where vehicles entering or leaving the property are restricted, or vehicles queue or hesitate, creating a safety hazard
  - A change in internal traffic patterns that may cause safety problems such as back up onto the highway or traffic crashes in the approach area

In addition to the established triggers for IAMP review, the agencies may request a review of the IAMP at any time if, in their determination, specific land use or transportation changes warrant a review of the underlying assumptions and/or recommendations within the IAMP. If the participants in the IAMP review meeting agree that, once the impacts of the “trigger” that necessitated the review are examined, an IAMP amendment is not warranted, a recommendation of “no action” may be documented and submitted in the form of a letter to Morrow County Council and the Oregon Transportation Commission.

If the findings and conclusions from the IAMP review meeting demonstrate the need for an update to the plan, review participants will initiate an IAMP update process. Initial steps in updating the IAMP will include scoping the planning process, identifying funding, and outlining a schedule for plan completion. Once completed, IAMP updates will be required to be legislatively adopted, requiring a County Board of Commissioners public hearing, as an amendment to the Morrow County Transportation System Plan and will be approved by the Oregon Transportation Commission as an update to the Oregon Highway Plan.

## TSP AND COMPREHENSIVE PLAN AMENDMENTS

The following outline discusses the major plan amendments that will need to occur at the county and state levels to support adoption of the I-84 Exit 159 IAMP.

### Morrow County

- The County adopt the I-84 Exit 159 Interchange Area Management Plan by reference as an element of the County's Transportation System Plan.
- The following interchange policy statements are included in the Morrow County Transportation System Plan:

*"The primary function of the I-84 Exit 159 interchange is to provide access via Tower Road to the surrounding industrial, agricultural, and commercial uses. Secondly, it provides access to Boardman via Kunze Lane."*

- The IAMP Transportation Improvement Plan, as illustrated in Project Prospectus sheets are included in the transportation improvements project list of the Transportation System Plan.
- The IAMP Access Management Plan elements, as illustrated in Project Prospectus sheets 1 through 5 for County facilities are included in the transportation improvements project list of the Transportation System Plan.

### Oregon Transportation Commission

- The I-84 Exit 159 Tower Road IAMP is approved by the Oregon Transportation Commission as part of the Oregon Highway Plan.
- The IAMP Transportation Improvement Plan, as illustrated in Project Prospectus sheets 1 through 3 are approved as part of the facility plan amendment to the Oregon Highway Plan.
- The IAMP Access Management Plan elements, as illustrated in Figure 3 and listed in Table 4, for State facilities are approved as part of the facility plan amendment to the Oregon Highway Plan.

### Other County Amendments

The following outlines other major amendments that will need to occur at the County level to support adoption of the I-84 Exit 159 IAMP.

- The County amends the County's zoning ordinance, establishing an Interchange Access Management Plan Overlay Zone and amending Article 2, 3, 4, 5 and 9. The contents of these proposed amendments will include requirements related to I-84 Exit 159 IAMP monitoring and updates and the submittal requirements, review standards, and application requirements for development within the overlay.

Section 4  
OHP Compliance

## OREGON HIGHWAY PLAN COMPLIANCE

This section discusses the Oregon Highway Plan (OHP) policy based compliance issues that pertain to the development of the I-84 Exit 159 IAMP.

The I-84 Exit 159 Tower Road IAMP was developed in accordance with the policies set forth in the OHP. The following identifies the OHP policies that pertain to the I-84 Exit 159 Tower Road IAMP and how the IAMP satisfies the requirements.

Policy 1A: State Highway Classification System. The state highway classification system includes five classifications: Interstate, Statewide, Regional, District, and Local Interest Roads. In addition, there are four special purpose categories that overlay the basic classifications: special land use areas, statewide freight route, scenic byways, and lifeline routes.

Within the IMSA, I-84 is the only ODOT highway.

*How Addressed:* The I-84 Exit 159 IAMP recognized the respective function of I-84. Access standards, traffic control, and geometric considerations were informed by the applicable highway designation.

Policy 1B: Land Use and Transportation. This policy recognizes the role of both the state and local governments related to the state highway system and calls for a coordinated approach to land use and transportation planning.

*How Addressed:* The IAMP was developed through a cooperative planning effort between Morrow County and ODOT. The IAMP will be implemented by Morrow County through an IAMP Management Area that will require coordinated agency review on all future development or land use actions within the IMSA.

Policy 1C: State Highway Freight System. This policy addresses the need to balance freight and other uses of the state highway system. It also recognizes the importance of maintaining efficient through movement on major truck freight routes throughout the state. I-84 is a designated National and Oregon Highway Plan Freight Route. I-84 is also designated as Reduction Review Routes for freight.

*How Addressed:* The proposed concept is expected to reduce intersection delay and reduce crash potential at both I-84 ramp terminals.

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

*How Addressed:* The I-84 Exit 159 IAMP demonstrates that the interchange will be able to meet ODOT mobility standards through the 20-year horizon. It also provides an access management element that improves access management near the interchanges.

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

*How Addressed:* The I-84 Exit 159 IAMP provides measures to increase efficiency through access management and provides improvements to the local street system.

**Policy 2A: Partnerships.** This policy emphasizes the state's efforts to establish partnerships to make more efficient use of limited resources to develop, operate, and maintain the highway and road system. The policy recognizes the partnerships among ODOT and other public agencies and the private sector.

*How Addressed:* The I-84 Exit 159 IAMP was developed through a partnership between ODOT and Morrow County. The Statewide Transportation Improvement Program, Morrow County, and private development funds may be combined as funding sources for the proposed improvements in the IAMP.

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

*How Addressed:* Tower Road is a locally owned road and the IAMP includes projects on Tower Road and to the local road circulation system adjacent to Tower Road.

**Policy 2D: Public Involvement:** This policy requires that citizens, businesses, regional and local governments, state agencies, and tribal governments have opportunities to have input on decisions that affect the state highway system.

*How Addressed:* The public provided input through the Public Advisory Committee, a project website, online surveys, interviews with business and freight providers along Tower Road and at a Mobility Advisory Committee Stakeholder Forum. This input was incorporated into the project development process.

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

*How Addressed:* Safety is a key component of the concept improvements, including continuous shared-use paths along Tower Road with appropriately placed crosswalks, a new bicycle and pedestrian bridge to enhance non-motorized connectivity across the interchange, roundabouts at both ramp terminals, and traffic control modifications at Tower Road's intersections with Love's Southern Driveway, Kunze Lane, and Boardman Airport Road.

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

*How Addressed:* See Policy 3C below.

Policy 3C: Interchange Access Management Areas. This policy addresses management of grade-separated interchange areas to ensure safe and efficient operation between connecting roadways. Action items include developing interchange area management plans to protect the function of the interchange to provide safe and efficient operations between connecting roadways and to minimize the need for major improvements of existing interchanges. The local jurisdiction's role in access management is stated in Policy 3C as follows: "necessary supporting improvements, such as road networks, channelization, medians and access control in the interchange management area must be identified in the local comprehensive plan and committed with an identified funding source, or must be in place (Action 3C.2)."

Access management standards are detailed in Policy 3C and include the distance required between an interchange and approaches and intersections. The most stringent standards apply in interchange areas.

*How Addressed:* The I-84 Exit 159 IAMP includes an access management element that consolidates access points and improves access spacing over the existing conditions.

Policy 3D: Deviations. This policy establishes general policies and procedures for deviations from adopted access management standards and policies.

*How Addressed:* The access management element moves in the direction of OHP access spacing standards, though achieving them will not be possible for all accesses.

Policy 4A: Efficiency of Freight Movement. This policy emphasizes the need to maintain and improve the efficiency of freight movement on the state highway system. I-84 is a designated National and Oregon Highway Plan Freight Route and a Reduction Review Route for freight. Input from the Mobility Advisory Committee will be included in the design process.

*How Addressed:* The transportation improvements included in the IAMP plan improve traffic operations and safety for all vehicles, including freight vehicles. This plan was reviewed at a Mobility Advisory Committee Stakeholder Forum.

Policy 4B: Alternative Passenger Modes. This policy supports alternative passenger transportation systems where travel demand, land use, and other factors indicate the potential for successful and effective development of alternative passenger modes.

*How Addressed:* The proposed concepts support multimodal transportation in the area, including providing a continuous shared use paths along Tower Road, enhanced crossings at the interchange ramp terminals and a pedestrian-bicycle bridge to cross the interchange bridge.

Policy 5A: Environmental Barriers. This policy states that the design, construction, operation, and maintenance of the state highway system should maintain or improve the natural and built environment.

*How Addressed:* No vulnerable ecosystems were identified in the study area.

Policy 5B: Scenic Resources. This policy applies to all state highways and commits the State to using best management practices to protect and enhance scenic resources in all phases of highway project planning, development, construction, and maintenance.

*How Addressed:* This policy was considered as part of the plan development. Historic and heritage sites will be avoided during design and construction.

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# PLANNING DEPARTMENT

PO Box 40 • 205 Third Street NE  
Irrigon, Oregon 97844  
(541) 922-4624

April 21, 2026

## MEMORANDUM

To: Morrow County Planning Commission  
From: Kaitlin Kennedy, Compliance Planner *KWK*  
CC: Tamra Mabbott, Planning Director and George Cress, Principal Planner  
Subject: Work Session – Home Occupation Permits for Family-Operated Trucking Businesses in Residential Zones.

The Morrow County Planning Department, in coordination with the Planning Commission, has been working with property owners to allow temporary home occupation permits for family-operated trucking businesses within suburban, rural, and farm residential zones. These temporary permits were initially approved in 2024, as a short-term solution to provide property owners with sufficient time to relocate or modify their businesses without significantly impacting their operations. The permits have included operational limitations to help ensure compatibility with surrounding residential uses.

In 2025, one such Home Occupation Permit was appealed to the Oregon Land Use Board of Appeals (LUBA) by the City of Irrigon. A final decision was issued January 2026 and reviewed by The Planning Department and Morrow County Land Use Counsel, Dan Kearns. In essence LUBA reversed the County's decision, and as a result, this ruling is expected to affect a substantial number of previously approved home occupation permits for family-operated trucking businesses.

LUBA's reversal indicates that the County's prior interpretation and application of home occupation provisions may not be consistent with applicable land use law or the zoning ordinance. This determination necessitates that the County reassess its approach to permitting trucking-related home occupations within residential zones. Additionally, the decision will significantly limit—or potentially preclude—the renewal of previously approved temporary permits, many of which were granted for one-year terms with the option for renewal in 2024 and 2025. See the LUBA Final Opinion and Order (Case No. 25056): <https://www.oregon.gov/luba/Docs/Opinions/2026/01-26/25056.pdf>

Key components of this work session will include a focused discussion on the status of existing permits, including whether they should remain valid, be revoked, deemed ineligible for renewal, or referred to code enforcement. The session will also explore potential compliance pathways for affected property owners, as well as possible amendments to the Morrow County Zoning Ordinance. Additionally, seasonal agricultural and economic impacts will be taken into consideration.

**Family-Operated Trucking Businesses in Residential Zones**

Morrow County Zoning Ordinance

**MCZO Section 3.050 Suburban Residential Zone SR (D)(2)**

In Suburban Residential one acre (SR-1) zone, commercial trucks and trucking businesses are not an allowed use. A landowner may be allowed to use a truck or tractor unit as personal transportation to the resident parcel. No more than one (1) truck or tractor unit is allowed per parcel.

**MCZO Section 3.051 Suburban Residential Zone SR (E)(2)**

In Suburban Residential 2A Two Acre (SR-2A) Zone, commercial trucks and trucking businesses are not an allowed use. A landowner may be allowed to use a truck or tractor unit as personal transportation to the resident parcel. No more than one (1) truck or tractor unit is allowed per parcel.

**MCZO Section 3.040 Rural Residential Zone RR (C)(2)**

In Rural Residential one acre (RR-1) zone, commercial trucks and trucking businesses are not an allowed use. A landowner may be allowed to use a truck or tractor unit as personal transportation to the resident parcel. No more than one (1) truck or tractor unit is allowed per parcel.

**MCZO Section 3.041 Farm Residential Zone FR (C)(2)**

In Farm Residential two acre (FR 2) zone, commercial trucks and trucking businesses are not an allowed use. A landowner may be allowed to use a truck or tractor unit as personal transportation to the resident parcel. No more than one (1) truck or tractor unit is allowed per parcel.

<b>Option 1.</b>	<b>Option 2.</b>	<b>Option 3.</b>	<b>NO ACTION</b>
<p><b>Accept the Oregon Land Use Board of Appeals final decision.</b></p> <p><u>Result:</u> Home Occupation Permits will no longer be renewed. Property owners with an existing permit may continue operating under it until it expires, but renewals will not be permitted.</p>	<p><b>Amend and revise current code language.</b></p> <p><u>Result:</u> In Suburban Residential 2A Two Acre (SR-2A) Zone, commercial trucks and trucking businesses are not an allowed use, <i>except as allowed as Home Occupations under MCZO 3.051(D)(3), when suitably conditioned and limited to two truck/trailer units.</i></p> <p>This acknowledges that limited truck businesses operated as legitimate home occupations out of the family home are allowed, limited to 2 truck/trailer combinations.</p>	<p><b>Amend the Morrow County Comprehensive Plan to establish an overlay zone permitting small, family-operated trucking businesses in the West Glen area.</b></p> <p><u>Result:</u> A West Glen Overlay Zone is intended to allow limited commercial trucking operations within designated residential areas where such uses have historically existed or may be deemed compatible, subject to strict conditions.</p>	<p><b>Remand back to Code Enforcement.</b></p> <p><u>Result:</u> Revert to a Corrective Action Plan requiring the landowner and business operator to acknowledge the violation in writing and achieve compliance within a specified deadline.</p>

**2024-2025 Conditional Use Permits for Home Occupation  
Commercial Truck Operations in Residential Zones**

Conditional Use Permit (CUP)	Morrow County Property Zoning	Number of Trucks per Application
<b>2024</b>		
CUP-N-367-24	Suburban Residential (SR2) MCZO Section 3.050	(2) Truck and Trailer Units
CUP-N-370-24	Suburban Residential (SR2) MCZO Section 3.050	(2) Truck and Trailer Units
CUP-N-371-24	Suburban Residential (SR2) MCZO Section 3.050	(8) Ten-Wheelers
CUP-N-373-24	Suburban Residential (SR2) MCZO Section 3.050	(5) Ten-Wheelers
CUP-N-375-24	Suburban Residential (SR2) MCZO Section 3.050	Truck Tractor and Trailer
CUP-N-376-24	Suburban Residential (SR2) MCZO Section 3.050	(5) Ten-Wheelers
CUP-N-377-24	Suburban Residential (SR2) MCZO Section 3.050	(8) Truck and Trailer Units
CUP-N-379-24	Suburban Residential (SR2) MCZO Section 3.050	(4) Truck and Trailer Units and one additional trailer
CUP-N-380-24	Suburban Residential (SR2) MCZO Section 3.050	(5) Truck and Trailer Units and one additional trailer
<b>2025</b>		
CUP-N-383-24	Suburban Residential (SR2) MCZO Section 3.050	(3) Ten-Wheelers (2) Truck Tractors
CUP-N-384-24	Suburban Residential (SR2) MCZO Section 3.050	(2) Ten-Wheelers (3) Truck Tractors
CUP-N-378-24	Suburban Residential (SR2) MCZO Section 3.050	(3) Ten-Wheelers (2) Truck Tractors
CUP-N-385-25	Rural Residential (RR) MCZO Section 3.040	(3) Truck and Trailer Units
CUP-N-386-25	Suburban Residential (SR2) MCZO Section 3.050	(1) Truck and Tractor Unit (2) Ten-Wheelers stored on property
CUP-N-388-25	Farm Residential (FR) MCZO Section 3.041	(6) Ten-Wheelers (5) Truck and Trailer Units (1) Truck and Double Trailer
CUP-N-389-25	Rural Residential (RR) MCZO Section 3.040	(5) Truck Tractors (no trailers)
CUP-N-390-25	Farm Residential (FR) MCZO Section 3.041	(5) Ten-Wheelers
CUP-N-392-25	Suburban Residential (SR2) MCZO Section 3.050	(5) Ten-Wheelers



P.O. Box 40 • 215 NE Main Ave. Irrigon, Oregon 97844  
(541) 922-4624 • [www.morrow.or.us/planning](http://www.morrow.or.us/planning)

April 3, 2026

**Re: Home Based Family Truck Operations**

**Dear Affected Property Owners and Interested Parties:**

You are receiving this notice as an affected property owner, applicant, or interested party. As you are aware, the Morrow County Planning Department and the Morrow County Planning Commission have been working with property owners to grant temporary home occupation permits, with operational limitations, for family-operated trucking businesses located within suburban, rural, and farm residential zones.

Last year, one such permit for a family-operated business was appealed to the State Land Use Board of Appeals (LUBA). The final decision has now been received and reviewed by the Planning Department and Morrow County Land Use Counsel, Dan Kearns. This decision will directly impact the issuance of new permits, and the renewal of conditional use permits for home occupation, family-operated trucking businesses. As a result, the County will hold a work session with the Morrow County Planning Commission to discuss options for current permit holders and the future direction of these operations.

The Morrow County Planning Commission will hold a work session on Tuesday, April 28, 2026, at the Morrow County Government Center. The session will take place immediately following the public hearing for the Tower Road IAMP adoption, which will begin at 6pm.

This work session will include an active discussion among Commission members and staff regarding commercial trucking businesses operating within residential zones. Members of the public are welcome to attend and listen; however, please note that the session will be closed to public testimony.

Enclosed is a memorandum from Morrow County Land Use Counsel, Dan Kearns, regarding the final decision of the State Land Use Board of Appeals.

For further questions or concerns please contact please contact the Morrow County Planning Department or me directly at [kkennedy@morrowcountyor.gov](mailto:kkennedy@morrowcountyor.gov).

Cordially,

Kaitlin Kennedy  
Compliance Planner

Enc: Reeve Kearns PC Memorandum



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**Asunto: Operaciones de Camiones Familiares con Base en el Hogar**

**Estimados Propietarios Afectados y Partes Interesadas:**

Usted recibe este aviso como propietario afectado, solicitante o parte interesada. Como es de su conocimiento, el Departamento de Planificación del Condado de Morrow y la Comisión de Planificación del Condado de Morrow han estado trabajando con los propietarios para otorgar permisos temporales de ocupación en el hogar, con limitaciones operativas, a negocios familiares de transporte de carga ubicados en zonas residenciales suburbanas, rurales y agrícolas.

El año pasado, uno de estos permisos para un negocio familiar fue apelado ante la Junta de Apelaciones de Uso de Suelo (LUBA, por sus siglas en inglés). La decisión final de LUBA ha sido recibida y revisada por el Departamento de Planificación y el Asesor Legal de Uso de Suelo del Condado de Morrow, Dan Kearns. Esta decisión afectará directamente la emisión de nuevos permisos y la renovación de permisos de uso condicional para negocios familiares de transporte de carga con base en el hogar. Como resultado, el Condado llevará a cabo una sesión de trabajo con la Comisión de Planificación del Condado de Morrow para analizar opciones para los titulares de permisos actuales y la dirección futura de estas operaciones.

La Comisión de Planificación del Condado de Morrow llevará a cabo la sesión de trabajo el **martes 28 de abril de 2026**, en el Centro de Gobierno del Condado de Morrow. La sesión se realizará inmediatamente después de la audiencia pública para la adopción del IAMP de Tower Road, la cual comenzará a las **6:00 p.m.**

Esta sesión de trabajo incluirá una discusión activa entre los miembros de la Comisión y el personal sobre negocios de transporte comercial que operan en zonas residenciales. Se invita al público a asistir y escuchar; sin embargo, tenga en cuenta que la sesión estará cerrada a comentarios del público.

Se adjunta un memorando legal del Asesor Legal de Uso de Suelo del Condado de Morrow, Dan Kearns, sobre la decisión final de la Junta de Apelaciones de Uso de Suelo.

Para preguntas o inquietudes adicionales, por favor contacte al Departamento de Planificación del Condado de Morrow o comuníquese directamente conmigo en [kkennedy@morrowcountyor.gov](mailto:kkennedy@morrowcountyor.gov).

Atentamente,

Kaitlin Kennedy  
Planificadora de Cumplimiento

**Adjunto:** Memorando de Reeve Kearns PC

# Reeve Kearns PC

Attorneys at Law

P.O. Box 13015  
Portland, Oregon 97213  
Email: dan@reevekearns.com

Daniel H. Kearns  
Direct Dial: 503-997-6032

From: Daniel Kearns, land use counsel  
To: Tamra Mabbott, Planning Director  
Date: February 13, 2026  
Re: *City of Irrigon v. Morrow County*, LUBA No. 2025-056 – Implications for family truck operations in the County’s SR-2A Zone

LUBA reversed the County’s final decision in an appeal of the Campos Home Occupation permit (home-based family truck operation) on January 30, 2026, which raises issues that go beyond this isolated case. As a result, the County can no longer approve or renew existing home occupation permits for home-based family trucking operations in the County’s Suburban Residential 2A (SR-2A) Zone. Nonetheless, maintaining single trucks in the SR-2A Zone is still a use allowed outright.

LUBA concluded in its Final Opinion and Order that the prohibition of commercial trucks and trucking operations in the SR-2A Zone set forth in MCZO 3.051(E)(2) is absolute and broad enough to prohibit home-based family truck operations as home occupations. Over the past several years, the County has approved many such family truck operations in the SR-2A Zone as home occupations, many of which require periodic renewal. LUBA’s Final Opinion and Order precludes renewal of those already-issued home occupation permits. Any already issued permits that do not require renewal, however, remain valid.

cc: Matthew Jensen, County Administrator  
Kaitlin Kennedy, Code Enforcement Planner

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To: Morrow County Board of Commissioners  
 From: Tamra Mabbott, Planning Director  
 CC: Planning Commission  
 BOC Date: April 15, 2026  
 RE: Monthly Planning Update



### **Mission Statement**

Morrow County Planning Department provides guidance and support to citizens for short-term and long-range planning in land use, to sustain and improve the county's lands for future generations. Our goal is to foster development where people can live, work & play.

### **Energy Projects Update**

Based on a new law (HB 4031), one large solar project has announced their plan to withdraw from the State of Oregon Energy Facility Siting Council (EFSC) and submit their application to Morrow County Planning. The project, Well Spring Solar, owned by MN8, is a 750-Megawatt project with 500 MW of battery storage and a 14-mile transmission line on 7,365 (11.5 square miles) acres located five miles northwest of Lone. Information about the project was previously posted on the EFSC webpage. The company made the announcement during the local information meeting hosted by EFSC on Thursday, March 19, 2026, at the SAGE Center in Boardman. Planning staff have scheduled a pre-application meeting and are preparing to process the application beginning this summer. On March 18<sup>th</sup>, Planning Director, Principal Planner and Planning Commission Chair Stacie Ekstrom joined a large group on site to learn more about the project.

A large, stand-alone transmission line project owned by Pacific Power will be submitting their application to Morrow County sometime later this calendar year. The project is referred to as the Maverick to Apex transmission line project and is a 31.8 mile, 500kV project connecting the future Boardman to Hemingway transmission line near Bombing Range Road. This project is required to provide outreach opportunities six months prior filing for the local land use permit. Staff have had numerous conversations with the applicant and will provide more information in coming months.

Staff developed comments for the Wheatridge Renewable Energy Facility III Site Certificate amendment. The amendment is a request to extend the construction deadline for the unbuilt portion of the facility and to split the approval into two facilities, each with their own site certificates. Oregon EFSC has issued a Proposed Order for the amendment and hosted a public information meeting on March 19, 2026, at 5:30 pm at the Sage

Center in Boardman. Project information is available on the state website here:  
<https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREFIII.aspx>

Stephen Wrecsics, GIS Analyst, has updated the Planning Department's online interactive energy map:  
<https://www.arcgis.com/apps/dashboards/8508dc9076e84317a9fac30475a37bb0>

A current inventory and status of energy projects in Morrow County is available on the Planning Department's web page here:  
[https://www.morrowcountyor.gov/sites/default/files/fileattachments/planning/page/16138/morrow\\_county\\_energy\\_project\\_list.pdf](https://www.morrowcountyor.gov/sites/default/files/fileattachments/planning/page/16138/morrow_county_energy_project_list.pdf)

A storymap of projects in Morrow County is found here:  
<https://www.arcgis.com/apps/dashboards/8508dc9076e84317a9fac30475a37bb0>

Tamra, George and Clint are participating in the NACO Rural Energy Academy

### **Columbia River Heritage Trail Concept Plan Update**

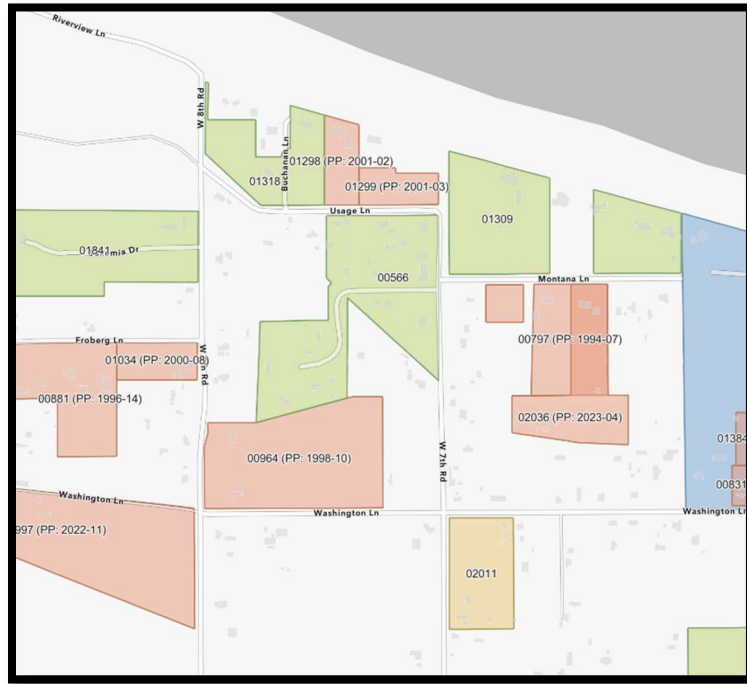
Planning staff and J-U-B Engineering are finalizing the 2024-2025 Heritage Trail Concept Plan update process. The Plan is scheduled for formal adoption as an Appendix to the Recreation Element of the Comprehensive Plan. The Board of Commissioners approved this amendment during their April 1, 2026, hearing and are scheduled to sign the adopting ordinance during their April 15, 2026, meeting.

Once the plan is adopted, county staff from Planning and Parks Departments will begin to implement numerous recommendations in the Concept Plan. Anyone interested in being involved in the trail planning and implementation activities is encouraged to contact Clint Shoemake, Planning Technician at (541) 922-4624 x5517 or [cshoemake@morrowcountyor.gov](mailto:cshoemake@morrowcountyor.gov).



## GIS Mapping and Drone

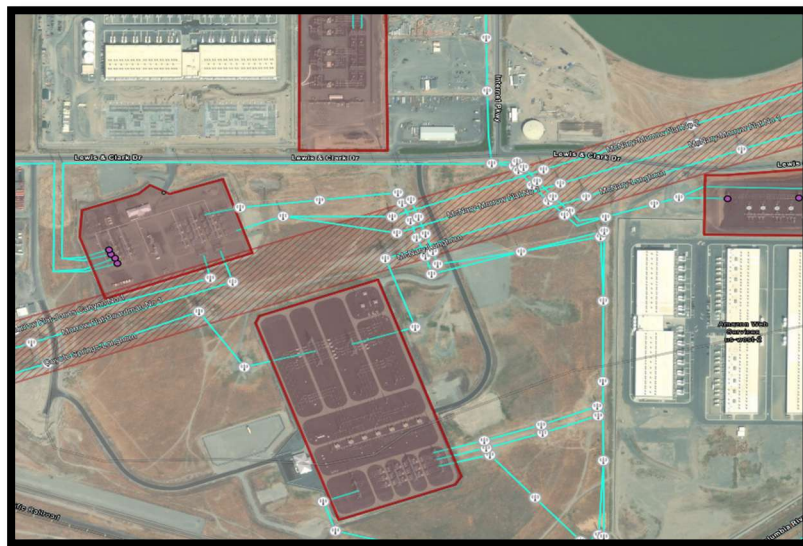
The Survey Explorer is now live on the Planning Department's webpage and available for internal and public use. While it is not yet a complete inventory of all surveys and corner markers within the county, it represents a significant step forward in improving access to survey information. The tool is designed to complement traditional plat research methods by allowing users to quickly identify and visualize available survey data in a map-based format. Ongoing efforts will continue to expand the dataset, with additional surveys and control points being incorporated over time as records are reviewed and digitized.



You can find the Morrow County Survey Explorer and our other interactive products on the Planning Department's webpage, [HERE](#).

In addition to the Survey Explorer, staff have compiled an internal inventory of transmission lines, substations, and other energy-related projects and infrastructure using exclusively publicly available data sources. This includes a broad range of facilities and corridors relevant to long-range planning, land use review, and infrastructure coordination. The dataset is intended to support Planning Department staff in project review, spatial analysis, and decision-making processes.

Because of the sensitive nature of the information, this map is being maintained as an internal planning



resource and is not designated for public release.

Staff will continue refining both datasets, with a focus on improving accuracy, filling data gaps, and ensuring the tools remain useful and reliable for planning purposes.

### **CODE COMPLIANCE**

The Morrow County Code Compliance Planner continues to address code complaints throughout the county. Code enforcement focuses on maintaining community standards and promoting public safety through education, inspections, and enforcement actions.

<b>March Monthly Summary</b>	
New Complaints	6
Follow-Up Inspections/Site Visits	10
Violations Closed	4
Active/Open Violations	54

In addition to routine enforcement activities, the Code Compliance Planner will be putting together a work session for the Morrow County Planning Commission Hearing on April 28, 2026, to discuss commercial trucking businesses in residential zones. This work session will be open for the public to attend but will not be open for public comment.

### **WATER AND PLANNING ACTIVITIES**

#### **Water Advisory Committee**

A summary of work on the implementation of the four water initiatives adopted by the Board of Commissioners in December 2024, as recommended by the Water Advisory Committee (WAC), is below.

**Initiative 1: Update the comprehensive plan Goals 5 and 6.** Assembling materials and soliciting volunteers to serve on a working group. The recent data and mapping analysis will be useful for this task. There is interest from at least one group from outside Morrow County in participating in this process.

**Initiative 2: Develop a Morrow County Drinking Water Program.** Ongoing at the Public Health Department.

**Initiative 3: Support Regional Water Planning;** staff have included budget for this work. Staff continue to provide support for county efforts working with neighbors.

**Initiative 4: Partner in a Clean Water Consortium (CWC).** Planning Director continues to participate in this board which is led by Board Chair David Sykes. The CWC hired an executive director, Jared Tesch. Staff provide background information, mapping and data to Mr. Tesch as needed.

#### **EPA Grant - Morrow Umatilla County Drinking Water-ROADMAP**

The Roadmap Steering Committee met on Monday, March 16<sup>th</sup> from 3-5 in the Don Adams Room in the North Morrow Government Center. GSI Water Solutions, Inc. gave a project update, describing stage 2 connection concepts and an update on non-connection concepts and a case study for non-connection options. A Public Outreach event is scheduled to be held at Umatilla City Hall on Wednesday, April 22<sup>nd</sup>, from 6-7:30 pm. Materials and information will be available in both Spanish and English.

More information about the roadmap project is available on the project webpage:

<https://drinkingwaterroadmap.org/>

### **Clean Drinking Water Consortium (CWC)**

Planning Director and the CWC met on Tuesday, March 10<sup>th</sup> at the Port of Morrow office in Boardman. The meetings are open to the public and usually take place on the second Tuesday of each month.

### **Lower Umatilla Basin Groundwater Management Area (LUBGWMA)**

The LUBGWMA Committee did not meet in March. The next meeting is scheduled for April 6<sup>th</sup> from 10 to noon in Hermiston at the Stafford Hansell Government Center. The Oregon Department of Environmental Quality (DEQ) issued the annual monitoring report, which outlines progress on the Nitrate Reduction Plan. The report is available here: <https://lubgwma.org/wp-content/uploads/2026/01/Oregon-LUBGMWA-Annual-Report-2025.pdf>

### **Boardman Source Water Protection Plan**

Planning Director is participating in the advisory committee for the City of Boardman's Source Water Protection Plan. GSI Water Solutions is the contractor hired by the city to research and write the plan, as well as lead public involvement. The committee reviewed met on March 13<sup>th</sup> and will meet again to review the draft implementation plan on April 21<sup>st</sup>.

### **Transportation Planning**

#### **Tower Road Interchange Area Management Plan (IAMP)**

On March 31, 2026, the project engineer, Kittelson & Associates, in coordination with representatives from the Oregon Department of Transportation (ODOT) and Morrow County, conducted a Joint Work Session. Attendees included the Board of Commissioners, members of the Planning Commission, and Morrow County staff from the Road Department, Public Transit, and Planning

The purpose of the session was to review final interchange design concepts, explore potential phasing options, and discuss draft adoption-ready code amendments. The discussion was productive, highlighting current challenges at the interchange as well as long-term goals aimed at improving safety and accommodating anticipated growth and development in the area.

Following the work session, planning staff will proceed with the formal adoption process for the Interchange Area Management Plan (IAMP) as an amendment to the Comprehensive Plan and Zoning Ordinances. The Morrow County Planning Commission will hold the formal adoption hearing during its regular monthly meeting on Tuesday, April 28, 2026, at 6:00 PM in Irrigon.

After the County completes the adoption process, the plan will be submitted to the Oregon Transportation Commission (OTC) for its adoption. Project plans, design concepts, and related materials are available on the county's website under Transportation Planning at: [Tower Road 2025 IAMP | Morrow County Oregon](#)

The Planning Department remains committed to supporting public comments regarding the interchange design concepts and continues to collaborate with the consultant team

and the ODOT in preparing the final Interchange Area Management Plan (IAMP) for Exit 159 at Tower Road along Interstate 84.

### **Transportation System Plan (TSP) Update**

A Scope of Work for the Morrow County Transportation System Plan (TSP) has been completed. Procurement for the project consultant was posted by the State of Oregon. The bid closed Monday, October 27<sup>th</sup>, 2025. Planning Staff participated in a pre-evaluation kickoff meeting on Thursday, October 30<sup>th</sup>, 2025, together with ODOT planners. The State of Oregon has issued an initial Notice of Intent to Award (NOITA) to one of the consultant proposers. David Evans & Associates (DEA) has accepted the award and has been in contract negotiation with ODOT and the County to finalize the scope of work. Anyone interested in participating in serving on the transportation planning committee please contact Kaitlin Kennedy in the Planning Department at (541) 922-4624 or [kkennedy@morrowcountyor.gov](mailto:kkennedy@morrowcountyor.gov)

### **Other**

#### **Community Wildfire Protection Plan (CWPP)**

Planning Director and GIS Analyst, along with Steve Freeland, Emergency Manager, have had multiple meetings with Oregon State Fire Marshall; Kevin Payne, Manager, Morrow SWCD and the new Heppner Fire Chief, Kevin Chick, to coordinate the update of the Community Wildfire Protection Plan (CWPP). The State and local fire marshals are encouraging the county to update the plan. Kevin Payne at SWCD has agreed to serve as the lead for the update effort which will also include managing an independent contractor for the technical and writing of the update. More information will follow in the coming months.

Planning Director met with a small group of residents who are interested in data centers and how they affect the community. They are particularly interested in impacts of future rezoning. The Board of Commissioners is considering hosting a round table discussion about data center impacts. Keep an eye on the Board calendar for more information.

Morrow County is co-hosting with Umatilla County, the Association of Oregon County Planning Directors (AOC PD) monthly meeting to be held in Boardman. The meeting will include a tour of energy, transmission and data center sites in both counties on Thursday afternoon and a day long meeting/training on Friday.

Several department staff members are participating in the National Association of Counties (NACO) Rural Energy Academy. Morrow County has a depth of experience in permitting and developing energy projects, but the online weekly meetings provide valuable insight into a variety of aspects. The course will continue for several months.