221 Molalla Ave. Suite 200 | Oregon City OR 97045
Ph (503) 722-3789 | Fax (503) 722-3880

FILE NO.:	Legislative File: L 13-01 - Transportation System Plan Legislative File L 13-02 – Associated Oregon City Municipal Code Amendments
APPLICANT:	Oregon City Public Works Department John Lewis 625 Center Street, Oregon City, Oregon 97045
REPRESENTATIVE:	DKS Associates, Consulting Engineers Carl D. Springer, PE 720 SW Washington Street, Suite 500, Portland, OR 97205
REQUEST:	Update the Oregon City Transportation System Plan, an Ancillary Document to the Oregon City Comprehensive Plan and adopt associated amendments to the Oregon City Municipal Code.
LOCATION:	City-wide.
REVIEWER:	Laura Terway, AICP Christina Robertson-Gardiner, AICP

17.50.170 - Legislative hearing process.
A. Purpose. Legislative actions involve the adoption or amendment of the city's land use regulations, comprehensive plan, maps, inventories and other policy documents that affect the entire city or large portions of it. Legislative actions which affect land use must begin with a public hearing before the planning commission.
B. Planning Commission Review.
1. Hearing Required. The planning commission shall hold at least one public hearing before recommending action on a legislative proposal. Any interested person may appear and provide written or oral testimony on the proposal at or prior to the hearing. The community development director shall notify the Oregon Department of Land Conservation and Development (DLCD) as required by the post-acknowledgment procedures of ORS 197.610 to 197.625, as applicable.
2. The community development director's Report. Once the planning commission hearing has been scheduled and noticed in accordance with Section 17.50.090(C) and any other applicable laws, the community development director shall prepare and make available a report on the legislative proposal at least seven days prior to the hearing.
3. Planning Commission Recommendation. At the conclusion of the hearing, the planning commission shall adopt a recommendation on the proposal to the city commission. The planning commission shall make a report and recommendation to the city commission on all legislative proposals. If the planning commission recommends adoption of some form of the proposal, the planning commission shall prepare and forward to the city commission a report and recommendation to that effect.
C. City Commission Review.
1. City Commission Action. Upon a recommendation from the planning commission on a legislative action, the city commission shall hold at least one public hearing on the proposal. Any interested person

may provide written or oral testimony on the proposal at or prior to the hearing. At the conclusion of the hearing, the city commission may adopt, modify or reject the legislative proposal, or it may remand the matter to the planning commission for further consideration. If the decision is to adopt at least some form of the proposal, and thereby amend the city's land use regulations, comprehensive plan, official zoning maps or some component of any of these documents, the city commission decision shall be enacted as an ordinance.
2. Notice of Final Decision. Not later than five days following the city commission final decision, the community development director shall mail notice of the decision to DLCD in accordance with ORS 197.615(2).
(Ord. No. 08-1014, §§ 1—3(Exhs. 1—3), 7-1-2009; Ord. No. 10-1003, § 1(Exh. 1), 7-7-2010)

IF YOU HAVE ANY QUESTIONS ABOUT THIS APPLICATION, PLEASE CONTACT THE PLANNING DIVISION OFFICE AT 503-722-3789.

Proposed Project
The proposed Oregon City Transportation System Plan (TSP) will articulate policy and identify facilities that will guide the development and management of a multi-modal transportation system through 2035. The updated document reflects the changes that have occurred since the current Transportation System Plan was adopted in 2001. Since then new requirements have been integrated into the Oregon Transportation Plan, the Oregon Highway Plan, and the Metro RTP, many key transportation projects have been completed, the local UGB and Urban Reserve areas have changed, and the City's Comprehensive Plan and Municipal Code were updated. These regulatory, land use and transportation system changes informed the resulting TSP update.

The proposed development includes:
- Adoption of the Transportation System Plan as an ancillary document to the Comprehensive Plan
- Amendments to the Oregon City Municipal Code to implement the Transportation System Plan
- Adoption of the Regional Center boundary
- Temporarily exempting permitted and conditional uses from complying with the current mobility standards for three intersections on the state highway system: OR 99E/ I-205 ramps, I-205/OR 213 ramps, and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center.

FACTS

Public Involvement and Public Comment
The TSP update process provided opportunities for public involvement in the legislative decision making process through the public hearing process, newspaper noticing, meetings, online participation and open houses. The process was informed by a Stakeholder Advisory Team (SAT) which included representatives from the Citizen Involvement Council (CIC), Clackamas Community College, Chamber of Commerce, School District, Clackamas County, Main Street Oregon City, and private development interests as well as a Technical Advisory Team (TAT).

The public involvement process included (3) Technical Advisory Team meetings, four (4) Stakeholder Advisory Team meetings, four (4) Community Meetings and other tools identified in the Transportation System Plan Public Outreach Plan (Exhibit 1). The TSP was available for review on the Oregon City website at the following address: http://www.octransportationplan.org/.

Notice of the first Planning Commission public hearing for the proposal was published in the Clackamas Review on, and mailed to the affected agencies, the CIC and all Neighborhood Associations. In accordance with ORS 197.610 and OAR 660-018-000, a Notice of Proposed Amendment to the Oregon City Comprehensive Plan was provided to the Oregon Department of Land Conservation and Development 35 days prior to the first noticed Evidentiary Hearing on February 13, 2013. Notice was mailed to all property owners within the urban growth boundary (over 10,500) on February 13, 2013.

Comments received throughout the process are included in the record and have been provided to the Commission. The comments generally identified deficiencies in the transportation system and suggested opportunities for public improvements. The comments were reviewed and utilized when creating the list of projects identified in the Transportation System Plan. None of comments received were directed to any applicable approval criteria.

DECISION-MAKING CRITERIA:

Oregon City Comprehensive Plan

Section 1 Citizen Involvement
Goal 1.2 Community and Comprehensive Planning
Ensure that citizens, neighborhood groups, and affected property owners are involved in all phases of the comprehensive planning program.
Policy 1.2.1 - Encourage citizens to participate in appropriate government functions and land-use planning.
Goal 1.3 Community Education - Provide education for individuals, groups, and communities to ensure effective participation in decision-making processes that affect the livability of neighborhoods.
Goal 1.4 Community Involvement - Provide complete information for individuals, groups, and communities to participate in public policy planning and implementation of policies.
Policy 1.4.1 - Notify citizens about community involvement opportunities when they occur.
Goal 1.5 Government/Community Relations -Provide a framework for facilitating open, two-way communication between City representatives and individuals, groups, and communities.
Finding: Complies. Development of the plan included an extensive public involvement effort as documented in the Transportation System Plan Public Outreach Plan (Exhibit 1). Oregon City Public Works Department has presented the project to the public at a series of meetings including the Citizen Involvement Council, Neighborhood Associations, Planning Commission and City Commission. Documentation produced with the TSP update has been posted on the project website throughout the duration of the project and comments have been integrated into the final product. The product was reviewed through the Legislative approval process. Notification of the proposed Legislative action was sent to all property owners within the Urban Growth Boundary.

Section 2: Land Use
Goal 2.2 Downtown Oregon City
Develop the Downtown area, which includes the Historic Downtown Area, the "north end" of the Downtown, Clackamette Cove, and the End of the Oregon Trail area, as a quality place for shopping, living, working, cultural and recreational activities, and social interaction. Provide walkways for pedestrian and bicycle traffic, preserve views of Willamette Falls and the Willamette River, and preserve the natural amenities of the area.

Policy 2.2.2 - Support multi-modal transportation options throughout the Regional Center and to other Regional and Town Centers.
Policy 2.2.8 - Implement the Oregon City Downtown Community Plan and Oregon City Waterfront Master Plan with regulations and programs that support compatible and complementary mixed uses, including housing, hospitality services, restaurants, civic and institutional, offices, some types of industrial and retail uses in the Regional Center, all at a relatively concentrated density.
Policy 2.2.9 -Improve connectivity for vehicles, bicycles, and pedestrians within the Oregon City Downtown community and waterfront master plan areas and improve links between residential areas and the community beyond.
Policy 2.4.3 -Promote connectivity between neighborhoods and neighborhood commercial centers through a variety of transportation modes.
Policy 2.6.7 -Establish priorities to ensure that adequate public facilities are available to support the desired industrial development.
Finding: Complies. The Transportation System Plan provides opportunities to facilitate increased travel opportunities for vehicles, pedestrians and bicyclists by identifying insufficient facilities and associated prioritized projects. Implementation of the projects will result in a more complete transportation system with a variety of multi-modal travel options. In addition, temporarily exempting permitted and conditional uses from complying with the current mobility standards for three intersections on the state highway system: OR 99E/ I-205 ramps, I-205/OR 213 ramps, and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center will allow the City to continue to allow development as well as adoption of a Regional Center boundary. The plan included an analysis of all previous plans including the Downtown Community Plan and the Waterfront Master Plan. Amendments to the Oregon City Municipal Code implement the concepts identified in the TSP.

Section 6: Quality of Air, Water and Land Resources
Goal 6.1 Air Quality -Promote the conservation, protection and improvement of the quality of the air in Oregon City.
Policy 6.1.2 -Ensure that development practices comply with or exceed regional, state, and federal standards for air quality.
Finding: Complies. The share of improvements recommended in the TSP update which result in more significant levels of pollution has dramatically decreased since the 2001 TSP. As shown in Figure 24 of the TSP (Volume 1), projects related to walking, biking, and taking transit have increased from approximately 51% of the projects in the 2001 TSP to approximately 74% of the projects in the TSP update, represented by over 260 projects. This set of projects combined with projected employment growth within the city over the next 20 years results in an approximately 13% reduction in vehicle miles traveled (VMT) in the evening peak period through 2035, more than the 10% reduction set as a climate change target (TSP Volume 1, Table 25).

The Oregon City Municipal Code amendments are proposed to implement the TSP update and comply with the Regional Transportation Function Plan (RTFP) to include provisions to establish unobstructed paths on sidewalks, require more closely spaced pedestrian and bicycle accessways, support crossings in the vicinity of transit stops, and establish requirements for long-term bicycle parking (TSP Volume 2, Section K). Based on the existing review processes defined in the Oregon City Municipal Code, the proposed TSP update and code amendments are consistent.

Section 11: Public Facilities
Goal 11.1 Provision of Public Facilities

Serve the health, safety, education, welfare, and recreational needs of all Oregon City residents through the planning and provision of adequate public facilities.
Finding: Complies. The TSP is necessary to maintain compliance with Statewide Planning Goal 11, Public Facilities. Goal 11 requires that public facilities and services be provided in a timely, orderly and efficient manner. The goal's central concept is that local governments should plan public services in accordance with the community's needs as a whole rather than be forced to respond to individual developments as they occur. As shown in the findings below, the proposed update of the TSP is consistent with Goal 11.1.

Policy 11.1.1
Ensure adequate public funding for the following public facilities and services, if feasible:
• Transportation infrastructure
Finding: Complies. The TSP update includes a detailed discussion of funding for proposed transportation improvements, including expenditures expected from the Street Fund, Systems Development Charge (SDC) Fund, and Transportation Utility Fee Fund. In addition, the General Fund, a local fuel tax, an Urban Renewal District, local improvement districts, and debt financing are potential funding and financing resources (TSP Volume 1, Section 6 and TSP Volume 2, Section H). The TSP update establishes both a financially constrained set of proposed transportation improvements that can be funded by expected revenues, as well a planned set of transportation improvements that are not reasonably expected to be funded by 2035, but many of which are important to making progress on the goals and performance targets for the transportation system.

The recommended projects are projected to meet performance targets throughout the city, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan. The proposed TSP is consistent with this policy.

Policy 11.1.2
Provide public facilities and services consistent with the goals, policies and implementing measures of the Comprehensive Plan, if feasible.
Finding: Complies. The TSP update provides guidance for the timely, efficient and economic provision of transportation facilities within the existing city and to new development areas within the UGB consistent with the relevant goals, policies and implementing measures of the Comprehensive Plan. The proposed TSP update is consistent with this policy.

Policy 11.1.4
Support development on underdeveloped or vacant buildable land within the city where public facilities and services are available or can be provided and where land-use compatibility can be found relative to the environment, zoning, and Comprehensive Plan goals.

Finding: Complies. The proposed improvements in the TSP update respond to the transportation demand that is estimated to be generated by development and growth in city households and employment that is projected through 2035. The projected growth is based on land use inventories and plans from Metro and the City. Projects within the TSP include street extensions and expansions of streets and intersections throughout the City (TSP Volume 2, Section I, Figures 2 and 3). In addition, the amendments to Oregon City Municipal Code provide an avenue for context sensitive street design for new development. The proposed TSP update is consistent with this policy.

Policy 11.1.5

Design the extension or improvement of any major public facility and service to an area to complement other public facilities and services at uniform levels.

Finding: Complies. The TSP update is designed to meet performance standards for existing and future development within the UGB. Investing in the transportation system improvements that are recommended in the TSP (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2) and implementing transportation demand management programs in the employment growth areas in the City are expected to accommodate the forecasted travel demand through 2035. The recommended projects are projected to meet performance targets throughout the city, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

The City has adopted development code and engineering standards to ensure concurrent provision of public facilities and services at uniform levels. Pursuant to these requirements, street improvements are typically required to be extended to a new development area at the same time as other public facilities such as sewer, storm drainage, water, and emergency services. The proposed TSP update is consistent with this policy.

Policy 11.1.7

Develop and maintain a coordinated Capital Improvements Plan that provides a framework, schedule, prioritization, and cost estimate for the provision of public facilities and services within the City of Oregon City and its Urban Growth Boundary.

Finding: Complies. The TSP update capital improvement program (CIP) is included in the TSP. The CIP is organized into short-term, medium-term, and long-term projects to be implemented in increments of five years. Funding the proposed transportation solutions is discussed in Section 6 of the TSP and in the findings for Policy 11.1.1 above. The proposed Transportation System Plan is consistent with this policy.

Goal 11.6 Transportation Infrastructure

Optimize the City's investment in transportation infrastructure.

Finding: Complies. As described in Section 2 of the TSP, the approach to developing solutions was to focus on smaller cost-effective solutions rather than larger, more costly ones according to a five-tiered

process that starts with system management measures and ends with those to extend and build new roadways. As a result, as described in Section 5 of the TSP, the recommended solutions in the plan related to walking, biking, shared-use paths, family friendly facilities, transit, and crossings account for about 74% of the recommended solutions and those to driving, about 26% (Figure 10). Further, in Section 7 of the TSP, a financially constrained plan is presented. The projects and programs in this plan are expected to be funded by 2035 and, as such, are prioritized for implementation. The driving-related solutions in the financially constrained plan are classified as management, extension, and expansion projects. Of the almost $74 million worth of investments in the financially constrained plan, about 80% are eligible for SDC funding. The proposed TSP update is consistent with Goal 11.6.

The recommended projects are projected to meet performance targets throughout the city, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

Policy 11.6.1
Make investments to accommodate multi-modal traffic as much as possible to include bike lanes, bus turnouts and shelters, sidewalks, etc., especially on major and minor arterial roads, and in regional and employment centers.
Finding: Complies. As cited above, the recommended solutions in the plan related to walking, biking, shared-use paths, family friendly facilities, transit, and crossings account for about 74% of the recommended solutions, as shown in Section 5 of the TSP. The projects are included in both the Financially Constrained Transportation System (likely to be funded list) and Planned Transportation System (unlikely to be funded list) in the updated TSP. The financially constrained plan (Table 5) features pedestrian projects that fill sidewalk gaps throughout the city, including in the Downtown and Regional Center. Biking projects focus on wayfinding signage, shared lane marking, and bike lanes, and transit projects on signal prioritization and bus stop amenity improvements. All of the pedestrian, biking, and transit solutions in the financially constrained plan are reinforced and expanded upon by the family friendly route, shared-use path, and crossing solutions proposed in the plan as well.

A portion of Oregon City is designated as a Regional Center in the Metro 2040 Plan. By officially acknowledging the Regional Center boundary, multi-modal transportation options may be pursued. The proposed TSP update is consistent with this policy.

Policy 11.6.2
Advocate for local, state, and regional cooperation in achieving an integrated connected system such as for the Amtrak station, light rail, and bus transit.
Finding: Complies. Goal 6 in Section 2 of the updated TSP establishes that the City will work to "(i)ncrease the convenience and availability of pedestrian, bicycle, and transit modes," which – in terms of transit facilities and service – entails collaborating with agencies like Metro, TriMet, and the South

Clackamas Transportation District (SCTD). As outlined in the plan and policy review (TSP Volume 2, Appendix A), intercity (high-speed) rail through Oregon City's Regional Center is indicated in Metro's 2035 RTP and 2040 Growth Concept, and TriMet's 2011 Transit Investment Plan (TIP) includes the following projects related to Oregon City.

- Walkability assessment at Molalla Avenue / County Red Soils Campus for pedestrian obstacles and recommendations for any needed projects.
- Portland to Milwaukie Light Rail Project, which will connect downtown Portland to Milwaukie and connect to Frequent Service buses from the Oregon City Regional Center.
- A proposed Bus Rapid Transit (BRT) corridor following I-205 between Clackamas Town Center possibly stretching as far as Beaverton, with service to Oregon City, Tualatin, and Tigard.
- Frequent bus service line expansion to and from Oregon City, primarily around the Oregon City Transit Center.

Transit related projects in the Financially Constrained Transportation System (TSP Volume 1, Table 5) and Planned Transportation System (TSP Volume 2, Section I, Table 2) include signal prioritization, bus amenity improvements, and formation of an Oregon City transportation management association (TMA), which will – at a minimum – involve coordination between the City and TriMet.

A portion of Oregon City is designated as a Regional Center in the Metro 2040 Plan. Acknowledgment of the Regional Center boundary supports an intercity (high-speed) rail through Oregon City's Regional Center is indicated in Metro's 2035 RTP and 2040 Growth Concept. The proposed TSP update is consistent with this policy.

Section 12: Transportation

Goal 12.1 Land Use-Transportation Connection

Ensure that the mutually supportive nature of land use and transportation is recognized in planning for the future of Oregon City.

Policy 12.1.1 - Maintain and enhance citywide transportation functionality by emphasizing multi-modal travel options for all types of land uses.

Policy 12.1.4 - Provide walkable neighborhoods. They are desirable places to live, work, learn and play, and therefore a key component of smart growth.

Finding: Complies. The Transportation System Plan provides opportunities to facilitate increased travel options for vehicles, pedestrians and bicyclists by identifying insufficient facilities and associated prioritized projects. Implementation of the projects will result in a more complete transportation system with a variety of multi-modal travel opportunities.

Goal 12.2 Local and Regional Transit

Promote regional mass transit (South Corridor bus, Bus Rapid Transit, and light rail) that will serve Oregon City.

Finding: Complies. The proposed plan supports mass transit by providing a complete transportation facility which will allow safe access for mass transit users and building and automotive and bicycle parking designs.

Goal 12.3 Multi-Modal Travel Options

Develop and maintain a transportation system that provides and encourages a variety of multi-modal travel options to meet the mobility needs of all Oregon

City residents.

Policy 12.3.1 -Provide an interconnected and accessible street system that minimizes vehicle miles traveled and inappropriate neighborhood cut through traffic.

Policy 12.3.2 -Provide an interconnected and accessible pedestrian system that links residential areas with major pedestrian generators such as employment centers, public facilities, and recreational areas.
Policy 12.3.3 - Provide a well-defined and accessible bicycle network that links residential areas, major bicycle generators, employment centers, recreational areas, and the arterial and collector roadway network.
Policy 12.3.4 -Ensure the adequacy of pedestrian and bicycle connections to local, county, and regional trails.
Policy 12.3.5 -Promote and encourage a public transit system that ensures efficient accessibility, mobility, and interconnectivity between travel modes for all residents of Oregon City.
Policy 12.3.6 -Establish a truck route network that ensures efficient access and mobility to commercial and industrial areas while minimizing adverse residential impacts.
Policy 12.3.8 -Ensure that the multi-modal transportation system preserves, protects, and sup- ports the environmental integrity of the Oregon City community.
Policy 12.3.9 -Ensure that the city's transportation system is coordinated with regional transportation facility plans and policies of partnering and affected agencies.
Finding: Complies. The Transportation System Plan provides opportunities to facilitate increased mobility for vehicles, pedestrians and bicyclists by identifying insufficient facilities and associated prioritized projects. Implementation of the projects and the associated amendments to the Oregon City Municipal Code will result in a more complete transportation system with a variety of connected multi-modal travel options and a truck route network which support one another. The plan was created in conjunction with other affected agencies.

Goal 12.4 Light Rail
Promote light rail that serves Oregon City and locate park-and-ride facilities at convenient neighborhood nodes to facilitate access to regional transit.
Policy 12.4.1 -Support light rail development to Oregon City.
Finding: Complies. The proposed plan supports mass transit by providing context sensitive street designs, and a complete transportation facility which will allow safe access for light rail users.

Goal 12.5 Safety
Develop and maintain a transportation system that is safe.
Policy 12.5.1 -Identify improvements that are needed to increase the safety of the transportation system for all users.
Policy 12.5.2 -Identify and implement ways to minimize conflict points between different modes of travel.
Policy 12.5.3 -Improve the safety of vehicular, rail, bicycle, and pedestrian crossings.
Finding: Complies. The top-ranked goal of the TSP update is to "(e)nhance the health and safety of residents." Existing safety concerns include high collision locations, with multiple sites along OR 99E, around Downtown, and along Beavercreek Road and Molalla Avenue (Figure 7, TSP Volume 2, Section D). Based on RTP requirements to establish a range of performance measures in local TSP, the objective of the TSP update is to reduce fatalities and serious injuries by 50% between 2010 and 2035.
Although there is not a reliable tool for forecasting future collisions, safety is expected to improve given implementation of the recommended investments in the TSP update. These investments include street crossings, walking and biking facilities, and improvements to high collision locations and congested intersections. Even if the target is not achieved, rates of collisions, serious injuries, and fatalities are expected to decrease and implement the TSP safety objective with the implementation of the TSP and associated amendments to the Oregon City Municipal Code.

Goal 12.6 Capacity

Develop and maintain a transportation system that has enough capacity to meet users' needs.
Policy 12.6.1 - Provide a transportation system that serves existing and projected travel demand.
Policy 12.6.2 - Identify transportation system improvements that mitigate existing and projected areas of congestion.
Policy 12.6.3 - Ensure the adequacy of travel mode options and travel routes (parallel systems) in areas of congestion.
Policy 12.6.4 - Identify and prioritize improved connectivity throughout the city street system.
Finding: Complies. Policy and projects in the TSP update are proposed to serve existing and planned uses within the urban growth boundary surrounding Oregon City. The recommended projects are projected to meet performance targets throughout the city, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for he interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

Goal 12.7 Sustainable Approach
Promote a transportation system that supports sustainable practices.
Policy 12.7.4 - Promote multi-modal transportation links and facilities as a means of limiting traffic congestion.
Finding: Complies. The proposed Transportation System Plan and associated amendments to the Oregon City Municipal Code allow for a complete transportation network for all modes of transportation.

Goal 12.8 Implementation/Funding
Identify and implement needed transportation system improvements using available funding.
Policy 12.8.1 - Maximize the efficiency of the Oregon City transportation system, thus minimizing the required financial investment in transportation improvements, wit out adversely impacting neighboring jurisdictions and facilities.
Policy 12.8.2 - Provide transportation system improvements that facilitate the timely implementation of the Oregon City Downtown Community Plan and protect regional and local access to the End of the Oregon Trail Interpretive Center.
Finding: Complies. The proposed projects in the TSP maximize the efficiency of the transportation system by focusing improvements throughout the City and solving transportation problems by employing the following strategy to identify improvements throughout the City.

Investing in the transportation system improvements that are recommended in the TSP Financially Constrained and Planned Transportation System Plans (Table 5 in the TSP Volume 1 and Table 2 in TSP Volume 2, Section I) and implementing transportation demand management programs in the employment growth areas in the city are expected to accommodate the forecasted travel demand through 2035 with exception. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

CONSISTENCY WITH STATEWIDE PLANNING GOALS

STATEWIDE PLANNING GOAL 1:
To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 1 of the Oregon City Comprehensive Plan: Citizen Involvement. An overview of the public involvement process is provided within this report and demonstrated in the Transportation System Plan Public Outreach Plan (Exhibit 1). Staff finds that the TSP update process is consistent with Statewide Planning Goal 1.

STATEWIDE PLANNING GOAL 2:
To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 2 of the Oregon City Comprehensive Plan: Land Use. Because the TSP is an ancillary document to the City's Comprehensive Plan, the application was processed pursuant to the legislative hearing process outlined in Section 17.50.170 of the Oregon City Municipal Code. The TSP document and its projections, analysis, maps, recommended improvements, and proposed funding plan are based the series of reports that

were prepared as part of developing the TSP update, including the existing conditions report, future conditions report, future needs analysis, and planned and financially constrained systems reports (TSP Volume 2).

In addition to the City's Comprehensive Plan, a review of other existing state, regional, and local plans, policies, standards, and laws that are relevant to local transportation planning was conducted at the beginning of the TSP update process, and is documented in Section A of the TSP Volume 2. The TSP update and associated amendments were developed in coordination with ODOT, Metro, and TriMet and were developed to be consistent with those applicable regulations. The proposed TSP update and associated amendments are consistent with Statewide Planning Goal 2.

STATEWIDE PLANNING GOAL 5:
To protect natural resources and conserve scenic and historic areas and open spaces.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 5 of the Oregon City Comprehensive Plan: Open Spaces, Scenic and Historic Areas, and Natural Resources. The Oregon City Municipal Code contains specific review criteria for uses within overlay districts to assure that designated Goal 5 resources are appropriately considered when development is proposed. In particular, the Natural Resource Overlay District designation: "provides a framework for protection of Metro Titles 3 and 13 lands, and Statewide Planning Goal 5 resources within Oregon City. The Natural Resource Overlay District (NROD) implements the Oregon City Comprehensive Plan Natural Resource Goals and Policies, as well as Federal Clean Water Act requirements for shading of streams and reduction of water temperatures, and the recommendations of the Metro ESEE Analysis. Trails, paths, and roads are permitted either outright or with restrictions in the Natural Resource Overlay District as identified in OCMC 17.49.150.

Within the Historic Overlay District, which includes the Canemah Historic District, McLoughlin Conservation District, designated Landmarks and Historic corridors, proposed public utility projects may be reviewed by the Historic Review Board to determine potential impact historic resources. The Historic Review Board has adopted character guidelines that pertain to improvements in the public right of way, utilities and related equipment to assure compatibility with historic resources. Goal 5 resources outside the city limits within the UGB are reviewed as part of the required Concept Planning for those areas prior to and subsequent with annexation. Concept plans must be implemented through zoning designations and overlay protection zones to assure that Goal 5 resources are protected to the extent required by State law and Metro.

Further, the proposed amendments to the Oregon City Municipal Code allow for a modification to the street design standard to construct context sensitive design. This would allow narrower roads within environmentally sensitive areas and appropriate public improvements in historic areas. Based on the existing review processes defined in the Oregon City Municipal Code, the proposed TSP update is consistent with Statewide Planning Goal 5.

STATEWIDE PLANNING GOAL 6:
To maintain and improve the quality of the air, water and land resources of the state.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 6 of the Oregon City Comprehensive Plan: Quality of Air, Water and Land Resources. By planning system improvements based on projected demand and land use patterns, the plan will ensure that land suited for development will be served efficiently.

The share of improvements recommended in the TSP update which result in more significant levels of pollution has dramatically decreased since the 2001 TSP. As shown in Figure 24 of the TSP (Volume 1), projects related to walking, biking, and taking transit have increased from approximately 51% of the projects in the 2001 TSP to approximately 74% of the projects in the TSP update, represented by over 260 projects. This set of projects combined with projected employment growth within the city over the next 20 years results in an approximately 13% reduction in vehicle miles traveled (VMT) in the evening peak period through 2035, more than the 10% reduction set as a climate change target (TSP Volume 1, Table 25).

The Oregon City Municipal Code amendments are proposed to implement the TSP update and comply with the Regional Transportation Function Plan (RTFP) to include provisions to establish unobstructed paths on sidewalks, require more closely spaced pedestrian and bicycle accessways, support crossings in the vicinity of transit stops, and establish requirements for long-term bicycle parking (TSP Volume 2, Section K). Based on the existing review processes defined in the Oregon City Municipal Code, the proposed TSP update and code amendments are consistent with Statewide Planning Goal 6.

STATEWIDE PLANNING GOAL 7:
To protect people and property from natural hazards.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 7 of the Oregon City Comprehensive Plan: Natural Hazards. This goal primarily addresses how the city should plan development to avoid hazard posed by floods, steep slopes, geologically unstable areas and other natural hazards. The projects recommended in the TSP update were established through a "solutions identification process" with evaluation criteria that accounted for environmental hazards and impacts. Even when transportation projects are permitted outright in underlying zones, the Flood Management Overlay District (OCMC Chapter 17.42), US-Geologic Hazards Overlay District (OCMC Chapter 17.44) and Natural Resource Overlay District (OCMC Chapter 17.49) provide development standards for transportation projects in these overlay districts.

All projects within the TSP, whether they are within the Geologic Hazards Overlay District or not, include detailed surveys conducted to identify hydrologic, topographic or other geological constraints that could hinder the widening and future extensions of the planned streets before construction is initiated. All street extensions included in this Plan are shown with conceptual alignments with a planning level illustration that street connectivity enhancements are needed in these areas. Final street alignments will be identified after these surveys have been completed. Based on development standards and review processes defined in the Oregon City Municipal Code, the TSP update is consistent with Statewide Planning Goal 7.

STATEWIDE PLANNING GOAL 9:
To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 9 of the Oregon City Comprehensive Plan: Economic Development. Policy and projects in the TSP update are proposed to serve existing and planned commercial and employment uses in the interchange study area. Employment trips were a part of future traffic conditions analyzed in the city. Over 23,000 jobs are expected in 2035, which represents almost 60% growth since 2010 (TSP Volume 1, Section 3).
There are areas of commercial, industrial, mixed use commercial, and mixed use employment land designated along arterials and collectors in the city. The future demand projections showed congested and over-capacity conditions on segments of OR 99E in Downtown and around the I-205 interchange

and on a segment of Redland Road south of Anchor Way (TSP Volume 1, Figure 5). Investing in the transportation system improvements that are recommended in the TSP update (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2), including transportation demand management programs, is expected to accommodate the forecasted travel demand through 2035. Operations under implementation of the recommended solutions are projected to meet performance targets throughout the city, with the exception of the interchanges of I-205/99E, I-205/OR 213 and 213/Beavercreek Road. The recommended solutions move these intersections toward compliance with targets (TSP Volume 1, Section 8). Based on the existing review processes defined in the Oregon City Municipal Code, the proposed TSP update is consistent with Statewide Planning Goal 9.

STATEWIDE PLANNING GOAL 10:
To provide for the housing needs of citizens of the state.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 10 of the Oregon City Comprehensive Plan: Housing. Adoption of the TSP update will addresses improvements needed to ensure the orderly extension of transportation facilities to accommodate the projected growth envisioned in the City's Comprehensive Plan, which includes a variety of housing types. Policy and projects in the TSP update are proposed to serve existing and planned residential and mixed-use areas in the city. Residential trips were a part of future traffic conditions analyzed in the city. Almost 21,000 households are expected in the city in 2035, which represents over 60% growth since 2010 (TSP Volume 1, Section 3).

STATEWIDE PLANNING GOAL 11:
To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 11 of the Oregon City Comprehensive Plan: Public Facilities. As stated in Section 11, the transportation infrastructure in Oregon City is governed by the Oregon City Transportation System Plan (Oregon City TSP), adopted in 2001 and proposed for update in 2013. The relevant Public Facilities goals and policies and findings are discussed in greater detail above.

STATEWIDE PLANNING GOAL 12:
To provide and encourage a safe, convenient and economic transportation system.
Finding: Complies. This goal is implemented at the local level through the applicable Goals and Policies in the updated TSP, Section 2 (The Vision). This goal is also implemented at the state level through the Transportation Planning Rule (TPR), OAR 660-012, which is addressed later in this report and in Exhibit 2. The TSP goals were developed and ranked by TSP update project stakeholders, and were the basis for evaluation criteria used in selecting and assessing the projected performance of the projects and solutions recommended in the TSP update. The goals, in order of importance to the community and project stakeholders, are:

- Enhance the health and safety of residents
- Emphasize effective and efficient management of the transportation system
- Foster a sustainable transportation system
- Provide an equitable, balanced and connected multi-modal transportation system
- Identify solutions and funding to meet system needs
- Increase the convenience and availability of pedestrian, bicycle, and transit modes
- Ensure the transportation system supports a prosperous and competitive economy
- Comply with state and regional transportation plans.

Section I of Volume 2 (Planned and Financially Constrained Transportation Systems) of the updated TSP explains how 360 solutions for the Oregon City transportation system were reduced to a Financially Constrained Transportation System Plan (likely to be funded list) and a Planned Transportation System Plan (unlikely to be funded list). The process relied on the goals, evaluation criteria, and five-tiered solutions hierarchy. The proposed TSP update is consistent with Statewide Planning Goal 12.

STATEWIDE PLANNING GOAL 13: To conserve energy.
Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles.
Finding: Complies. This goal is implemented through the applicable Goals and Policies in Section 13 of the Oregon City Comprehensive Plan: Energy Conservation.

The multimodal transportation system and improvements proposed in the updated TSP and associated code amendments will support efficient use of land within the city limits and UGB based on existing adopted Comprehensive Plan and zoning designations. With this plan, the City can provide timely, orderly and efficient transportation improvements.

The City promotes the efficient use of land and conservation of energy through its Comprehensive Plan and zoning and development regulations within the Oregon City Municipal Code. Higher density and mixed use zoning, land division, and site plan design standards promote more compact development patterns, and promote bicycling and walking instead of relying on the automobile for routine errands. New annexations are required to show that public utilities can be efficiently extended to new urban areas. Metro-approved Concept Plans are required prior to annexation to the city to assure that urban services and amenities will be developed in logical places as the community develops. The proposed TSP and associated amendments are consistent with Statewide Planning Goal 13.

Oregon Transportation Plan (2006)
The Oregon Transportation Plan (OTP) is the state's long-range multimodal transportation plan. The OTP is the overarching policy document among a series of plans that together form the state transportation system plan (TSP). A TSP must be consistent with applicable OTP goals and policies. Findings of compatibility will be part of the basis for TSP approval. The most pertinent OTP goals and policies for city transportation system planning are provided below.

POLICY 1.2 – Equity, Efficiency and Travel Choices
It is the policy of the State of Oregon to promote a transportation system with multiple travel choices that are easy to use, reliable, cost-effective and accessible to all potential users, including the transportation disadvantaged.
Finding: Complies. The proposed TSP establishes design criteria for streets based on their functional classification and the designation within the Comprehensive Plan, resulting in a context sensitive development. The context zone, walking zone, and biking/on-street parking zone are important to establishing a reliable, accessible, and inviting environment for those walking, biking, and taking transit. The design criteria establish a minimum of five to ten and a half sidewalk width. Bike lanes that are six-feet-wide are required for most of the street design types. Maximum block sizes of 530 feet are provided and pedestrian access every 330 feet is required unless a modification is approved through a Type II process.

The recommended solutions in the plan related to walking, biking, shared-use paths, family friendly facilities, transit, and crossings account for about 74% of the recommended solutions (Figure 10). In the financially constrained plan, walking improvements consist largely of filling in sidewalk gaps as well as widening existing sidewalks and making ADA accessibility improvements. Biking improvements consist largely of providing bike lanes. The addition of shared-use paths add both walking and biking facilities. Transit improvements are focused on signal priority and enhancing transit stop amenities (See Table 5 in Section 7 (The Plan).

Recommended code amendments reinforce many of these elements of the TSP in establishing clear zones for unobstructed travel on sidewalks, requiring pedestrian accessways every 330 feet on long blocks, strengthening access to and amenities at transit facilities, and expanding bicycle parking requirements to address long-term parking (TSP Volume 2, Section K). The proposed TSP and associated amendments are consistent with Policy 1.2.

POLICY 2.1 - Capacity and Operational Efficiency
It is the policy of the State of Oregon to manage the transportation system to improve its capacity and operational efficiency for the long term benefit of people and goods movement.
Finding: Complies. The TSP update will result in increased mobility for vehicles, bicyclists and pedestrians. The recommended projects are projected to meet performance targets throughout the city, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

POLICY 2.2 – Management of Assets
It is the policy of the State of Oregon to manage transportation assets to extend their life and reduce maintenance costs.
Finding: Complies. The Financially Constrained (likely to be funded list) and Planned Transportation System (unlikely to be funded list) were developed based on the five-tiered solutions hierarchy that starts with system management measures and ends with those to extend and build new roadways. As a result, the number of cost-effective management recommendations and those related to walking, biking, shared-use paths, family friendly facilities, transit, and crossings account for the majority of projects and solutions in the updated. TSP (Table 5 in the TSP Volume 1 and Table 2 in the TSP Volume 2, Section I).

The TSP update is designed to meet performance standards for existing and future development within the UGB. Investing in the transportation system improvements that are recommended in the TSP Financially Constrained and Planned Transportation System Plans (Table 5 in the TSP Volume 1 and Table 2 in TSP Volume 2, Section I) and implementing transportation demand management programs in the employment growth areas in the city are expected to accommodate the forecasted travel demand

through 2035, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

POLICY 3.1 – An Integrated and Efficient Freight System
It is the policy of the State of Oregon to promote an integrated, efficient and reliable freight system involving air, barges, pipelines, rail, ships and trucks to provide Oregon a competitive advantage by moving goods faster and more reliably to regional, national and international markets.
Finding: Complies. The freight system in Oregon City is focused on truck freight. The TSP objective envisions decreasing truck delay by approximately 10% through 2035, to just over three minutes per truck trip during the evening peak period, based on freight mobility targets developed from the RTP.

POLICY 3.2 – Moving People to Support Economic Vitality
It is the policy of the State of Oregon to develop an integrated system of transportation facilities, services and information so that intrastate, interstate and international travelers can travel easily for business and recreation.
Finding: Complies. The freight system in Oregon City is focused on truck freight. The TSP objective envisions decreasing truck delay by approximately 10% through 2035, to just over three minutes per truck trip during the evening peak period, based on freight mobility targets developed from the RTP. High general traffic demand on regional transportation routes including I-205, OR 213, OR 99E, and OR 43 pose a challenge to meeting this performance measure. Truck delay in the city during the evening peak period (after assuming the planned system investments) is expected to increase slightly through 2035, from about three and a half minutes to four minutes per person. However, the City is moving in the direction of this performance measure by decreasing truck delay 15% from what would be expected without the implementation of recommended planned transportation system investments. (See Section 8 (Outcomes) of TSP Volume 1.) The proposed TSP is consistent with Policies 3.1 and 3.2.

POLICY 4.1 - Environmentally Responsible Transportation System
It is the policy of the State of Oregon to provide a transportation system that is environmentally responsible and encourages conservation and protection of natural resources.
Finding: Complies. Implementation of the Financially Constrained (likely to be funded) and Planned Transportation System (unlikely to be funded) recommendations serves an area within the city's UGB that is planned for efficient urban development, as guided by state planning goals and regulations. Development of this land was assumed for projecting future transportation conditions and the transportation needs and solutions that were then determined based on those conditions.

The Oregon City Municipal Code contains review criteria for uses within the natural resource overlay district to assure that resources are appropriately considered when development is proposed. The Natural Resource Overlay District (NROD) "implements the Oregon City Comprehensive Plan Natural

Resource Goals and Policies, as well as Federal Clean Water Act requirements for shading of streams and reduction of water temperatures, and the recommendations of the Metro ESEE Analysis." Trails, paths, and roads are permitted either outright or with restrictions in the Natural Resource Overlay District. The restrictions are established in OCMC 17.49.150 (Standards for vehicular or pedestrian paths and roads). Even when transportation projects are permitted outright in underlying zones, the Flood Management Overlay District (OCMC Chapter 17.42) and US-Geologic Hazards Overlay District (OCMC Chapter 17.44) provide development standards for transportation projects in these overlay districts.

The share of improvements recommended in the TSP update that are less polluting has dramatically increased since the 2001 TSP. As shown in Figure 10 (TSP Volume 1), projects related to walking, biking, and taking transit have increased from approximately 51% of the projects in the 2001 TSP to approximately 74% of the projects in the TSP update, representing over 260 projects in the Planned Transportation System.

Code amendments proposed to implement the TSP update and comply with the Regional Transportation Function Plan (RTFP) include provisions to establish unobstructed paths on sidewalks, require more closely spaced pedestrian and bicycle accessways, support crossings in the vicinity of transit stops, and establish requirements for long-term bicycle parking (TSP Volume 2, Section K). These amendments reinforce the pedestrian, bicycle, and transit improvements that are recommended in the TSP update. The proposed TSP and associated amendments are consistent with Policy 4.1.

POLICY 5.1 – Safety
It is the policy of the State of Oregon to continually improve the safety and security of all modes and transportation facilities for system users including operators, passengers, pedestrians, recipients of goods and services, and property owners.
Finding: Complies. The top-ranked goal of the TSP update is to "(e)nhance the health and safety of residents." Existing safety concerns include high collision locations, with multiple sites along OR 99E, around Downtown, and along Beavercreek Road and Molalla Avenue (Figure 7, TSP Volume 2, Section D). Based on RTP requirements to establish a range of performance measures in local TSP, the objective of the TSP update is to reduce fatalities and serious injuries by 50% between 2010 and 2035. Although there is not a reliable tool for forecasting future collisions, safety is expected to improve given implementation of the recommended investments in the TSP update. These investments include street crossings, walking and biking facilities, and improvements to high collision locations and congested intersections. Even if the target is not achieved, rates of collisions, serious injuries, and fatalities are expected to decrease and move in the direction of the TSP safety objective with the implementation of these recommended TSP projects. The proposed TSP is consistent with Policy 5.1.

POLICY 7.1 – A Coordinated Transportation System
It is the policy of the State of Oregon to work collaboratively with other jurisdictions and agencies with the objective of removing barriers so the transportation system can function as one system.
Finding: Complies. Staff from the Oregon Department of Transportation (ODOT), Clackamas County, TriMet, and ODOT were involved in the Technical Advisory Team (TAT) and throughout the creation of the plan. Coordination provisions with those jurisdictions – particularly the State as required by OAR 660-012-0045 –are established. The proposed TSP is consistent with Policy 7.1.

POLICY 7.3 – Public Involvement and Consultation

It is the policy of the State of Oregon to involve Oregonians to the fullest practical extent in transportation planning and implementation in order to deliver a transportation system that meets the diverse needs of the state.
Finding: Complies. Development of the TSP relied on the participation of the Technical Advisory Team (TAT) and Stakeholder Advisory Team (SAT) and the activities of these teams as well as other public involvement efforts are described in the Transportation System Plan Public Outreach Plan (Exhibit 1).

POLICY 7.4 – Environmental Justice
It is the policy of the State of Oregon to provide all Oregonians, regardless of race, culture or income, equal access to transportation decision-making so all Oregonians may fairly share in benefits and burdens and enjoy the same degree of protection from disproportionate adverse impacts.
Finding: Complies. Development of the TSP update relied on the participation of the Technical Advisory Team (TAT) and Stakeholder Advisory Team (SAT) and other public involvement efforts are described in the Transportation System Plan Public Outreach Plan (Exhibit 1). Section D in TSP Volume 2 discusses environmental justice. The Environmental Protection Agency states that: "Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." The environmental justice effort within the TSP was to identify concentrations of underserved and vulnerable populations so that transportation services can be improved in this areas while avoiding or at least distributing impacts of planned projects more equitably across the city.

Goal 4 of the TSP commits the City to: "(p)rovide an equitable, balanced and connected multimodal transportation system" (Section 2, TSP Volume 1). Objectives and evaluation criteria for TSP projects under the goal include ensuring that the transportation system provides equitable access to underserved and vulnerable populations and reduces total housing and transportation costs for residents.

As found through the Census, Figure A5 in Section D identifies concentrations of low-income residents in the Park Place neighborhood, minority populations around Molalla Avenue between Beavercreek Road and Division Street, and the elderly around the 15th Street/Division Street intersection. Significant populations of non-English speakers and people with disabilities were not found in the city. Proposed Financially Constrained and Planned Transportation System improvements (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2) identify walking, biking, shared-use path, family friendly route, transit, and crossing improvements in these areas of underserved and vulnerable populations as well as throughout the city (Figures 17-19, TSP Volume 1). Roadway extension and expansion projects, and their potential associated impacts, are also distributed throughout the city (Figures 14-16, TSP Volume 1). The proposed TSP is consistent with Policies 7.3 and 7.4.

Oregon Highway Plan
The 1999 Oregon Highway Plan (OHP) establishes policies and investment strategies for Oregon's state highway system over a 20-year period and refines the goals and policies found in the OTP. Policies in the OHP emphasize the efficient management of the highway system to increase safety and to extend highway capacity, partnerships with other agencies and local governments, and the use of new techniques to improve road safety and capacity. These policies also link land use and transportation, set standards for highway performance and access management, and emphasize the relationship between state highways and local road, bicycle, pedestrian, transit, rail, and air systems. The policies applicable to the Oregon City TSP are addressed below.

Policy 1A *(Highway Classification) defines the function of state highways to serve different types of traffic that should be incorporated into and specified through IAMPs.*
Finding: Complies. The TSP included a review of state highways in coordination with the Oregon Department of Transportation. There are four sets of State roadways in Oregon City, including I-205 (an Interstate highway) and OR 99E, OR 213, and OR 43 (all District highways).

Policy 1C *(State Highway Freight System) states the need to balance the movement of goods and services with other uses.*
Finding: Complies. As identified in Section A (Plans and Policies Framework) of TSP Volume 2, there are four sets of State roadways in Oregon City, including I-205 (an Interstate highway) and OR 99E, OR 213, and OR 43 (all District highways). The TSP defers to ODOT's access management review and regulations of the State. In terms of safety, as described earlier in the OTP findings, safety concerns exist at sites along state facilities OR 99E and OR 213 (TSP Volume 2, Section D, Figure 7). Although there is not a reliable tool for forecasting future collisions, safety is expected to improve given implementation of the recommended investments in street crossings, walking and biking facilities, and improvements to high collision locations and congested intersections in the TSP update.

The proposed improvements in the Financially Constrained and Planned Transportation System plans (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2) serve safety and mobility on state roadways in the city. The TSP update is designed to meet performance standards for existing and future development. Investing in the transportation system improvements that are recommended in the TSP Financially Constrained and Planned Transportation System Plans (Table 5 in the TSP Volume 1 and Table 2 in TSP Volume 2, Section I) and implementing transportation demand management programs in the employment growth areas in the city are expected to accommodate the forecasted travel demand through 2035, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

Also as described earlier in OTP findings, high general traffic demand on regional transportation and freight routes including I-205, OR 213, OR 99E, and OR 43 pose a challenge to meeting performance measures related to freight. Truck delay in the city during the evening peak period (after assuming the planned system investments) is expected to increase slightly through 2035. However, the City is decreasing truck delay 15% from what would be expected without the implementation of recommended planned transportation system investments. (See TSP Volume 1, Section 8) Updated and more liberal mobility standards – ranging from 0.99 to 1.10 volume-to-capacity for peak 1st hour and 2nd hour – are proposed for City roadways in Section 4 (Standards) in order to balance motor vehicle mobility with improved conditions for walking and biking. The proposed TSP is consistent with Policies 1A and 1C.

Policy 1B *(Land Use and Transportation) recognizes the need for coordination between state and local jurisdictions.*
Finding: Complies. Coordination between Oregon City, Clackamas County and ODOT has occurred in developing the TSP for project administration and through the Technical Advisory Team (TAT) process.

Policy 1F *(Highway Mobility Standards) sets mobility standards for ensuring a reliable and acceptable level of mobility on the highway system by identifying necessary improvements that would allow the interchange to function in a manner consistent with OHP mobility standards.*
Finding: Complies. The TSP update is designed to meet performance standards for existing and future development within the UGB. Oregon Highway Plan, Policy 1F3 sets forth the applicable mobility targets for the state roads. As part of the analysis conducted for the TSP, twenty key intersections were analyzed to determine their performance in 2035 based on planned development. The predicted performance at these 20 key intersections was compared with the mobility standards proposed in the TSP. If the level of congestion exceeded allowable standards, projects were identified that would improve intersection performance to meet the applicable mobility standards and were included within the TSP. Example projects that increase capacity and allow an intersection to meet the mobility standards include the construction of an additional turn lane or the installation of a traffic signal. Once the projects are constructed the intersection would meet the mobility standard over the planning horizon.

For most of the key intersections, affordable and implementable improvements were identified which would allow the intersection to meet mobility standards during the 20-year planning horizon. However, at three intersections, the improvements necessary to satisfy the mobility standard were determined to be so costly that they could not be reasonably constructed. The three locations, all on the state highway system, are:

> I-205/OR 213 Interchange- According to ODOT the redesigned interchange would include construction of additional lanes and bridges, costing $100 million to $200 million.
>
> OR 99E/I-205 Interchange- The City and ODOT agreed that the redesigned interchange would include increasing the capacity of the freeway off-ramps with additional lanes or extending existing lanes, costing $10 million to $30 million or more. Speculation today suggests that the "or more" solutions could include additional travel lanes on I-205 between the Gladstone interchange and the West Linn/Lake Oswego interchange.
>
> Beavercreek Road/OR 213 - The 2001 TSP identified a grade-separated interchange costing $20 million. Adjusting for inflation, that same project today would be $26 million.

Using the lowest range of the estimated costs, the total of all the intersection improvements is $136 million ($100M + $10M + $26M = $136 M). Again, these locations are all on the state highway system.

Even in combination, ODOT, Clackamas County, and Oregon City do not have projected funding to implement the $136 million needed to reconstruct the three facilities to comply with the mobility standards. Due to the large cost associated with the improvements, the projects do not appear on the Oregon Highway Plan, the Regional Transportation System Plan or the proposed TSP project list because there is no reasonable likelihood that the projects will be funded. ODOT has made it clear to staff that they would oppose constructing the improvements associated with the intersections and would not contribute any funds for this purpose. ODOT's current revenue projections will be sufficient to cover

only the highest priority projects within the region. There is no state or regional funding identified for the three Oregon City locations.

Because funding is not likely to be available to implement these very expensive projects, ODOT recommends that the City undertake additional studies to develop other ways of meeting the City's transportation needs that do not involve major construction projects at these three locations. In addition, these studies may support adoption of alternate mobility standards that allow for a greater level of congestion than is currently allowed by ODOT or is proposed in the TSP. The transportation studies would likely look more broadly at the intersections to identify less costly improvements that provide some increased capacity as well as opportunities to invest in the local network to provide alternative routes and improvements for non-automobile travel in an effort to reduce peak hour trips at the aforementioned intersections. The scope of these additional studies has not been determined and may result in the identification of additional projects that could be added to those already included TSP. As most other jurisdictions in the region are also discovering that insufficient funds will be available to meet mobility standards, additional studies and the adoption of alternate mobility standards that allow for greater levels of congestion will likely be pursued by many jurisdictions. Undertaking such studies and adopting alternate mobility standards, an action that will also need to be taken by the Oregon Transportation Commission if it involves state highways, is likely to take 12-24 months to complete.

As specified in the Oregon City Municipal Code, most developers are required to conduct a traffic study identifying the traffic impacts of development on proximate intersections throughout the City that are most likely to be more significantly impacted. The Municipal Code requires that if development puts more than 20 new automobile trips through an intersection during the AM or PM peak hour, an analysis is required to demonstrate compliance with mobility standards.

As explained above, some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City is proposing to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the three aforementioned locations and all state facilities within or adjacent to the Regional Center. Attached is a table illustrating the standards applicable to the various intersections. This temporary exemption would be in effect while the City undertakes more detailed analysis and pursues adoption of an alternate mobility standard over the next 12-24 months.

Providing a temporary exemption for permitted and conditional uses with regard to their impact on state highway facilities would align City code requirements with ODOT requirements and other local governments which do not require compliance for any ODOT facility. In addition, the exemption satisfies the City's obligation to implement the state and regional transportation plans as required by state law.

Improvements identified in the TSP would be constructed but would not necessarily result in satisfaction of the mobility standards at the locations discussed above. If there are no improvements identified in the TSP associated with an intersection, no improvements would be made at that intersection. Since the aforementioned expensive improvements are not included in the TSP, congestion would be allowed to occur at these locations. Since the expensive improvements at these three key locations are not

included in the TSP project list, the current SDC program does not include the collection of any funds to pay for any improvements at these locations.

Subsection Policy 1F3 allows the development of alternative mobility standards "where it is infeasible or impractical to meet the mobility targets…in Table 7….ODOT and local jurisdictions may explore different target levels, methodologies and measures for assessing system performance…" Policy 1F further allows "If alternative targets are needed but cannot be established through the system planning process prior to adoption of a new or updated transportation system plan, they should be identified as necessary and committed to as a future refinement plan work items with an associated timeframe for completion and adoption". The mobility targets of OHP Table 7 remain in effect for the state facilities until alternative measures are adopted both locally and by the Oregon Transportation Commission.

Policy 1G *(Major Improvements) requires maintaining performance and improving safety by improving efficiency and management before adding capacity. ODOT works with regional and local governments to address highway performance and safety.*
Finding: Complies. Policy 1G is aligned with the five-tiered solutions structure established by the RTP/RTFP and followed by this TSP process. Solutions in the Financially Constrained and Planned Transportation Systems focused on management and multimodal measures before considering roadway extension and expansion projects. As a result, approximately 74% of the projects and programs recommended in the TSP are related to walking, biking, transit, and crossings. Of the 26% of projects that are roadway-related, 19 projects address management and intersection improvements, 17 projects are roadway extensions, and four projects are roadway expansions (Table 5, TSP Volume 1).
The proposed TSP is consistent with Policy 1G.

Policy 2B *(Off-System Improvements) helps local jurisdictions adopt land use and access management policies.*
Finding: Complies. Improvements recommended on the local system in the Financially Constrained Transportation (likely to be funded) System include signalization, signal optimization, installation of turn lanes and roundabouts, sidewalk construction, bike lane striping, extension of roadways, reconstruction of roadways to City standards, installation of crossings and curb ramps, and citywide programmatic measures such as wayfinding tools, transit signal priority and transit stop improvements, expanded bicycle parking design guidance and requirements, and Safe Routes to School (Table 5 and Figures 14-19 in TSP Volume 1). These local system improvements will help to reduce traffic and improve conditions on State roadways in the city. The proposed TSP is consistent with Policy 2B.

Policy 2F *(Traffic Safety) improves the safety of the highway system.*
Finding: Complies. As reported in earlier OHP and OTP findings, there are a number of high collision sites and safety concerns along state facilities OR 99E and OR 213 in the city (Figure 7, TSP Volume 2, Section D). Although there is not a reliable tool for forecasting future collisions, safety is expected to improve given implementation of the recommended investments in street crossings, walking and biking facilities, and improvements to high collision locations and congested intersections in the TSP update.
The proposed TSP is consistent with Policy 2F.

Policy 3A *(Classification and Spacing Standards) sets access spacing standards for driveways and approaches to the state highway system.*
Finding: Complies. The TSP update proposes access spacing standards in OCMC 12.04 for streets in Oregon City. The standards are differentiated by functional classification and surrounding Comprehensive Plan designations. New and redevelopment construction must comply with these

standards. Existing access points that do not comply with these standards may be required to consolidate access points or have access points restricted or closed in the future pursuant to the TSP. The proposed TSP and associated amendments are consistent with Policy 3A.

Policy 4B (Alternative Passenger Modes) *It is the policy of the State of Oregon to advance and support alternative passenger transportation systems where travel demand, land use, and other factors indicate the potential for successful and effective development of alternative passenger modes.*
Finding: Complies. As cited in the OTP findings, the recommended solutions related to walking, biking, shared-use paths, family friendly facilities, transit, and crossings account for about 74% of the recommended solutions, as shown in Section 5 (Investments) of the TSP. The projects are included in both the Financially Constrained Transportation (likely to be funded) System and Planned Transportation (unlikely to be funded) System plans in the 2013 updated TSP. The financially constrained plan (Table 5, Section 6, Volume 1) features pedestrian projects that fill sidewalk gaps throughout the city, including in the Downtown and Regional Center. Biking projects focus on wayfinding signage, shared lane marking, and bike lanes, and transit projects on signal prioritization and bus stop amenity improvements. All of the pedestrian, biking, and transit solutions in the financially constrained plan are reinforced and expanded upon by the family friendly route, shared-use path, and crossing solutions proposed in the plan as well. The proposed TSP is consistent with Policy 4B.

Policy and projects in the TSP update are proposed to serve existing and planned uses within the urban growth boundary surrounding Oregon City. The recommended projects are projected to meet performance targets throughout the city, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the Regional Center. With no reasonable solution resulting in compliance with mobility standards for these locations, the City will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan.

OAR 660 Division 12 Transportation Planning Rule (TPR)
The purpose of the TPR is "to implement Statewide Planning Goal 12 (Transportation) and promote the development of safe, convenient and economic transportation systems that are designed to reduce reliance on the automobile so that the air pollution, traffic and other livability problems faced by urban areas in other parts of the country might be avoided." A major purpose of the Transportation Planning Rule (TPR) is to promote more careful coordination of land use and transportation planning, to ensure that planned land uses are supported by and consistent with planned transportation facilities and improvements.
Finding: Complies. Findings demonstrating compliance with the TPR are located Exhibit 2.

OAR 734, Division 51. Highway Approaches, Access Control, Spacing Standards and Medians
OAR 734-051 governs the permitting, management, and standards of approaches to state highways to ensure safe and efficient operation of the state highways. OAR 734-051 policies address the following:

- *How to bring existing and future approaches into compliance with access spacing standards, and ensure the safe and efficient operation of the highway;*
- *The purpose and components of an access management plan; and*
- *Requirements regarding mitigation, modification and closure of existing approaches as part of project development.*

Finding: Complies.
The TSP update proposes access spacing standards for streets in Oregon City. The standards are differentiated by functional classification and surrounding Comprehensive Plan designations. New and redevelopment construction must comply with these standards. Existing access points that do not comply with these standards may be required to consolidate access points or have access points restricted or closed in the future pursuant to the TSP.

Regional Transportation Plan
The Regional Transportation Functional Plan (RTFP) directs how Oregon City should implement the RTP through the TSP and other land use regulations. The RTFP codifies existing and new requirements which local plans must comply with to be consistent with the RTP. If a TSP is consistent with the RTFP, Metro will find it to be consistent with the RTP.
Finding: Complies. The Transportation System Plan has integrated all regionally designated roads into the TSP. For example, Holly Lane which is designated as an arterial in the Regional Transportation Plan is also designated as an arterial in the Oregon City TSP and projects are identified to upgrade Holly lane to an urban arterial standard as required by the RTP. It should be noted that the projects along Holly are either unfunded or dependent upon annexations and development along the street. Additional findings demonstrating compliance with the RTFP and RTP are located Exhibit 2.

CONCLUSION
For the reasons set forth above, the City Commission approves Planning files L 13-01 and L 13-02 for the 2013 Oregon City Transportation System Plan including the adoption of the Regional Center boundary, as an ancillary document to the Oregon City Comprehensive Plan and amends the Oregon City Municipal Code to implement this plan.

EXHIBITS
1) Transportation System Plan Public Outreach Plan
2) Regional Transportation Functional Plan (RTFP) and Transportation Planning Rule (TPR) Compliance
3) Map of Regional Center

Oregon City
Transportation System Plan Update
Public Outreach

City of Oregon City
Public Works
625 Center Street
Oregon City, Oregon 97045

Outreach of the Transportation System Plan (TSP) Update Project

The plan extends to the submittal of a Legislative Planning application

Table of Contents

Introduction..... 3

A. How has the Public been involved in the TSP Update?
   1. Advisory Committees..... 3
   2. Commission Updates 4
   3. Community Meetings 4
   4. Outreach via Community Events and other Organizations.....4

B. How did the City get the word out about the TSP update?
   1. Utility Bills..... 5
   2. Mailed Postcards.....5
   3. Project Posters 5
   4. Websites 6
   5. Project Website Note Cards..... 6
   6. Social media 6
   7. Earned Media 7

Introduction

Oregon City has been hard at work improving streets, sidewalks and trails. Now it is time to reevaluate our transportation system to identify and prioritize future projects. The Transportation System Plan (TSP) provides a long term guide to City transportation investments and incorporates the vision of the community into an equitable and efficient transportation system.

The City's current plan was adopted in 2001 and will be updated to reflect new state and regional TSP requirements, completion of transportation projects, added Urban Growth Boundary areas, Urban Reserves, population growth, the adoption of the 2004 Oregon City Comprehensive Plan, and policy direction provided by the Metro 2035 Regional Transportation Plan (RTP).

Citizen involvement is crucial to the TSP Update. The opportunity for the public to voice opportunities to strengthen our transportation system results in a successful project. This document highlights the major public involvement strategies to be employed in the Transportation System Plan Update.

A. How has the Public been involved in the TSP Update?

1. Advisory Committees

Stakeholder Advisory Team

The Stakeholder Advisory Team (SAT) serves as the voice of the community and the caretaker of the goals and objectives of the Updated TSP. The SAT assisted with the development of goals and objectives of the TSP and the creation of evaluation criteria to evaluate future projects. The SAT provided direction to staff and reviewed all documents associated with the TSP over email and at meetings. Invitations to join the committee were sent to the Transportation Advisory Committee, Parks and Recreation Advisory Committee, Historic Review Board, Natural Resource Committee, Planning Commission, Clackamas Community College, Main Street Oregon City, Chamber of Commerce, private development interests, Oregon City School District, Citizen Involvement Council and Clackamas County Planning Organizations, freight organizations, and local businesses. Invitations were also posted on the project website for the public. All SAT meetings were advertised and open to the public.

SAT Meeting #1: March 6, 2012
SAT Meeting #2: June 14, 2012
SAT Meeting #3: August 30, 2012
SAT Meeting #4: September 20, 2012

Technical Advisory Team (TAT)

The Technical Advisory Team (TAT) provided technical guidance and coordination throughout the Project. The TAT addressed and resolved technical and jurisdictional issues in order to produce a timely and complete Updated TSP. The TAT provided direction to staff and reviewed all documents associated with the TSP over email and at meetings. Invitations to the TAT were extended to Clackamas County Development and Transportation, Metro, ODOT, City of Gladstone, Oregon City Planning, Oregon City Development, Oregon City Public Works, Oregon City Community Services, Department of Land Conservation and Development (DLCD), Clackamas County Fire District #1, TriMet, and freight organizations. All TAT meetings were advertised and open to the public.

TAT Meeting #1: April 5, 2012
TAT Meeting #2: June 14, 2012
TAT Meeting #3: September 20, 2012

2. Committee Updates

Overview:
To ensure that the City Commission, Planning Commission, Historic Review Board and Natural Resource Committee members are fully informed about the TSP process, multiple presentations were made at regularly scheduled public hearings for these bodies.
Target Audience**:**
City Commission, Planning Commission, Historic Review Board and Natural Resource Committee

Implementation/Schedule:
Presentations and project updates were provided throughout the duration of the project.

3. Community Meetings – Open Houses

Overview:
To ensure that the public is provided multiple opportunities to learn about the project and interact with the project team, four Community Meetings were/are to be held. Email notices were sent to all city groups, SAT, TAT, CIC, Neighborhood Associations, churches and media groups. In addition, notices were posted on the City website, project website, Twitter, Facebook and signs were posted at all city facilities, online blogs, and at coffee shops, grocery stores, and other businesses around town.

Target Audience**:**
All stakeholders including residents, employees, property and business owners in Oregon City and adjacent communities.

Implementation/Schedule:
Community Meeting #1 - February 27, 2012
Community Meeting #2 - June 18, 2012
Community Meeting #3 - October 2, 2012
Community Meeting #4 – March 7, 2013

4. Outreach via other Organizations

Overview:
Presence at community events and collaboration with other organizations provides project exposure and directs a wide range of citizens to the project website.

Target Audience**:**
The general public, community groups

Implementation/Schedule:
A short presentation or a poster with a comment box was present at as many community meetings as possible. Examples of events include:

- Presentation at the Park Place Neighborhood Association Meeting
- Citizen Involvement Council

- Poster at Oregon City engAGE in Community Conversation
- EngAGE in Community Expo 2012
- Poster at the Landslide Preparedness Community Meeting
- Poster at the Earthquake & Emergency Preparedness Community Meeting
- Oregon City Hilltop Farmers Market
- ODOT Project Open House – Main Street Businesses
- ODOT Project Open House – Public
- Main Street Oregon City "Downtown Update" email to 400 to 500 email addresses.
- Trail News – An article has been published in each Trail News paper that has been released since the project began over a year ago.

B. How did the City get the word out about the TSP Update?

1. Utility Bills

Overview:
A flyer was placed in utility bills three times to inform utility customers of the Transportation System Plan Update project and direct them to the website.

Target Audience**:**
Oregon City utility customers

Implementation/Schedule:
More than 10,000 notices were provided to the Utility Billing Department for dispersal in the May 2012, October 2012, and February 2012 bills.

2. Mailed Postcards

Overview:
A postcard was mailed to all property owners within the urban growth boundary and within Oregon City limits informing citizens of the Transportation System Plan and providing the first work session and hearing dates for both the Planning Commission and the City Commission.

Target Audience**:**
Oregon City property owners and property owners in adjacent communities within the urban growth boundary.

Implementation/Schedule:
More than 10,500 postcards were mailed on February 15, 2013.

3. Project Poster

Overview:
A poster describing the project and directing the public how to comment on the project was created. The single-sided poster was printed on 8.5"x11" and larger poster sizes and posted at:

- City facilities

- On the project website
- Public meetings
- Public spaces such as parks, transit stations, etc.

Target Audience**:**
Oregon City residents, businesses and property owners.

Implementation/Schedule:
The poster was distributed throughout the project.

4. Website

Overview:
The Transportation System Plan (TSP) website (www.OCTransportationPlan.org) served as the primary public source of information about the project. All project documents as well as opportunities to comment are available on the website so that the public is continually involved in the process. The website features an interactive map to allow the public to post and view comments. A link to the project website is provided on the City's homepage. A rotating feature on the homepage of the City's website (www.orcity.org) will also direct the public to the project website.

Target Audience**:**
The general public

Implementation/Schedule:
The website has been available throughout the duration of the project.

5. Project Website Note Cards

Overview:
Note cards were created to provide a brief description of the project and a link to the Transportation System Plan (TSP) website (www.OCTransportationPlan.org). The cards were placed at City offices and at community events.

Target Audience**:**
The general public

Implementation/Schedule:
The cards were used throughout the duration of the project.

6. Social Media – Facebook and Twitter

Overview:
The City of Oregon City has both a Facebook and a Twitter account. Posts were added to each social media site directing the public to the TSP project website.

Target Audience**:**
Oregon City Facebook and Twitter followers

Implementation/Schedule:

Project information was posted throughout the project and before each of the project meetings.

7. Earned media

Overview:
John Lewis was interviewed on the radio regarding the Transportation System Plan in June 2012.

Target Audience**:**
Radio audience.

This exhibit provides findings of compliance of the proposed Oregon City Transportation System Plan (TSP) update and the existing and proposed amendments to the Oregon City Municipal Code (OCMC or "code") with the requirements set out in the Metro Regional Transportation Functional Plan (RTFP). As established in the RTFP, demonstrating compliance with the RTFP constitutes compliance with the Regional Transportation Plan (RTP).

The RTFP-related findings are included in Table 1; Table 2 includes findings of compliance for the Transportation Planning Rule (TPR), OAR 660-012. The findings address the relevant sections of the TPR including Section -0025 (Deferal of mode), Section -0045 (Implementation of the TSP) and Section -0060 (Plan and Land Use Regulation Amendments). In some cases, there are cross-references in sub-sections of the TPR to requirements in the RTFP.

Table 1: Findings of Compliance of the Municipal Code with the RTFP

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
Allow complete street designs consistent with regional street design policies **(Title 1, Street System Design Sec 3.08.110A(1))**	Existing code and the updated TSP meet these RTFP requirements in the following ways. OCMC 12.04.180 (Street design) addresses street design in terms of minimum right-of-way and pavement widths. The section refers to the TSP for the functional classifications of roadways that correspond to the minimum widths. Exceptions to the minimum standards are permitted through a public review process if the modification criteria in OCMC 12.04.007 are satisfied through a Type II procedure. Complete street designs, green street designs, and transit-supportive street designs are permitted and supported by this code language. In particular, OCMC 12.04.260 (Street design—Transit) facilitates transit-supportive street design in requiring the applicant to coordinate with TriMet when the applicant's site potentially impacts transit streets as identified in the TSP. Street designs that are provided in the updated TSP and proposed amendments reflect the surrounding land use designations and multi-modal use of the streets (TSP Volume 1, Tables 1-4; TSP Volume 2, Section K, OCMC Tables 12.04.180-183).
Allow green street designs consistent with federal regulations for stream protection **(Title 1, Street System Design Sec 3.08.110A(2))**	
Allow transit-supportive street designs that facilitate existing and planned transit service pursuant 3.08.120B **(Title 1, Street System Design Sec 3.08.110A(3))**	
Allow implementation of: • Narrow streets (<28 ft curb to curb); • Wide sidewalks (at least five feet of through zone); • Landscaped pedestrian buffer strips or paved furnishing zones of at least five feet, that include street trees; • Traffic calming to discourage traffic infiltration and excessive speeds; • Short and direct right-of-way routes and shared-use paths to connect residences with commercial services, parks, schools, hospitals, institutions, transit corridors, regional trails and other neighborhood activity centers;	Existing code, proposed code amendments (TSP Volume 2, Section K), and the updated TSP meet these RTFP requirements as follows: • Narrow streets: The cross-section standard for local streets in the 2013 TSP show pavement widths from 32 to 40 feet (TSP Volume 1, Table 4) depending on the street type (per land use context) Tbut may be reduced with a modification per OCMC 12.04.007. • Wide sidewalks and landscaped pedestrian buffer strips or paved furnishing zones: OCMC 12.04.180 (Street design) specifies right-of-way and pavement widths and street design. A landscape strip,

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
• Opportunities to extend streets in an incremental fashion, including posted notification on streets to be extended. **(Title 1, Street System Design Sec 3.08.110B)**	sidewalk, a public access is required for all streets. OCMC 12.04.265 (Street design—Planter strips) and the TSP address planting strips. OCMC 12.08.015 (Street tree planting and maintenance requirements) requires street trees for every 35 feet of frontage, to be evenly distributed along the frontage, for all new development and major redevelopment. OCMC 12.04.010 (Construction specifications—Improved streets) requires all sidewalks to be constructed to City standards and widths specified in the TSP. The TSP requires sidewalks for all roads functionally classified as arterials, collectors, and local streets, with widths no less than five feet (TSP Volume 1, Tables 1-4). • Traffic calming: Traffic calming is acknowledged in the 2001 TSP, and is more appropriately addressed in the TSP than the code. The updated TSP addresses traffic calming in projects proposed in the Financially Constrained and Planned Transportation Systems (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2). • Short and direct right-of-way routes and shared-use paths: OCMC 12.04.199 (Pedestrian and Bicycle Accessways) establishes standards "to provide direct, safe and convenient connections between residential areas, retail and office areas, institutional facilities, industrial parks, transit streets, neighborhood activity centers, rights-of-way, and pedestrian/bicycle accessways which minimize out-of-direction travel, and transit-orientated developments where public street connections for automobiles, bicycles and pedestrians are unavailable." Multimodal circulation within a site or land division is supported

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	by the provisions in OCMC 16.08.025.B (Traffic/Transportation Plan), 17.52 (Off-Street Parking and Loading), and 17.62 (Site Plan and Design Review). A detailed site circulation plan is required that shows proposed vehicular, bicycle, transit and pedestrian circulation within a site and connections to the existing transportation system, to existing rights-of-way or adjacent tracts, and to parking and loading areas. The code also establishes pedestrian and bicycle accessways, which are defined in OCMC 17.04.030 as " any off-street path or way as described in Chapter 12.04, intended primarily for pedestrians or bicycles and which provides direct routes within and from new developments to residential areas, retail and office areas, transit streets and neighborhood activity centers". Accessways, pursuant to OCMC 12.04, are required through private property or as right-of-way connecting development to the right-of-way at intervals not exceeding 330 feet of frontage; or where the lack of street continuity creates inconvenient or out of direction travel patterns for local pedestrian or bicycle trips.land divisions, master plans, commercial and multi-family developments (OCMC Chapters 16.08, 16.16, 17.68 and 17.62). In these ways, existing code provisions ensure that bicycle and pedestrian paths and connections can be required through the development and land division permitting process. • Opportunities to extend streets: The code discourages dead-end and stub streets but Subsection B of OCMC 12.04.175 (Street design—Generally) allows for stubbing streets when necessary to create connections to future adjacent development. Likewise, OCMC 17.62.050.A.2.g. in Site Design Review states that "Development shall be required to provide existing or future connections to adjacent sites through the use of a vehicular and pedestrian access easements where applicable." For land

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	divisions, OCMC 16.08.025.B (Traffic/Transportation Plan) requires that a detailed site circulation plan show "proposed vehicular, bicycle, transit and pedestrian access points and connections to the existing system, circulation patterns and connectivity to existing rights-of-way or adjacent tracts." Proposed amendments to the OCMC require that notification be posted on streets to be extended (see amendments to OCMC 12.04.175 in TSP Volume 2, Section K).
Require new residential or mixed-use development (of five or more acres) that proposes or is required to construct or extend street(s) to provide a site plan (consistent with the conceptual new streets map required by Title 1, Sec 3.08.110D) that: • Provides full street connections with spacing of no more than 530 feet between connections except where prevented by barriers • Provides a crossing every 800 to 1,200 feet if streets must cross water features protected pursuant to Title 3 UGMFP (unless habitat quality or the length of the crossing prevents a full street connection) • Provides bike and pedestrian accessways in lieu of streets with spacing of no more than 330 feet except where prevented by barriers • Limits use of cul-de-sacs and other closed-end street systems to situations where barriers prevent full street connections • Includes no closed-end street longer than 220 feet or having no more than 25 dwelling units **(Title 1, Street System Design Sec 3.08.110E)**	Existing code and proposed code amendments (TSP Volume 2, Section K) meet these RTFP requirements as follows: • In general, multimodal circulation within a site or land division is supported by OCMC 16.08.025.B (Traffic/Transportation Plan). • Street connections with spacing of no more than 530 feet between intersections is proposed in OCMC 12.04.195 (Spacing Standards), the Functional Classification map in Figure 6 of Volume I of the TSP. Accessways, pursuant to OCMC 12.04, are required through private property or as right-of-way connecting development to the right-of-way at intervals not exceeding 330 feet of frontage; or where the lack of street continuity creates inconvenient or out of direction travel patterns for local pedestrian or bicycle trips. (See TSP Volume 2, Section K). • Cul-de-sacs and closed-end streets: OCMC 12.04.225 (Street design—Cul-de-sacs and dead-end streets) currently limits the use of cul-de-sacs and dead-end streets in Oregon City. When they are proposed, they are required to be less than 200 feet long and limit housing on the street segment to 25 dwelling units for new cul-de-sacs in order to fully comply with this RTFP requirement (see TSP Volume 2, Section K). OCMC 12.04.225 (Pedestrian and bicycle accessways) requires pedestrian and

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	bicycle accessways from cul-de-sacs.
Establish city/county standards for local street connectivity, consistent with Title 1, Sec 3.08.110E, that applies to new residential or mixed-use development (of less than five acres) that proposes or is required to construct or extend street(s). **(Title 1, Street System Design Sec 3.08.110F)**	Existing code language meets this requirement. Preliminary plat standards for subdivisions in OCMC 16.08.025.B require a transportation plan which shows a circulation system that is connected to the surrounding transportation system and demonstrates compliance with other code transportation standards. This includes compliance with block length standards in OCMC 12.04.195 (Spacing Standards), the Functional Classification map in Figure 6 of Volume I of the TSP, as well as required connections with future adjacent development (OCMC 12.04.196, and 17.62.050.A.2.f).
To the extent feasible, restrict driveway and street access in the vicinity of interchange ramp terminals, consistent with Oregon Highway Plan Access Management Standards, and accommodate local circulation on the local system. Public street connections, consistent with regional street design and spacing standards, shall be encouraged and shall supersede this access restriction. Multimodal street design features including pedestrian crossings and on-street parking shall be allowed where appropriate. **(Title 1, Street System Design Sec 3.08.110G)**	Existing code, proposed code amendments and the updated TSP meet this RTFP requirement in the following ways. OCMC 12.04.005.A (Jurisdiction and management of the public rights-of-way) acknowledges that ODOT and Clackamas County also have rights-of-way in the city and, for facilities not under City jurisdiction, defers to the applicable jurisdiction and their permitting standards. Proposed street spacing standards (TSP Volume 1, OCMC 12.04.195) allow for more connectivity than the requirements in RTFP Section 3.08.110G and C. Street connections with spacing of no more than 530 feet between intersections is proposed in OCMC 12.04.195 (Spacing Standards), the Functional Classification map in Figure 6 of Volume I of the TSP to provide connectivity and nonlocal streets shall be constructed as identified in the Functional Classification Map in the TSP (OCMC 12.04.180).

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	Pedestrian crossings are addressed in proposed projects in the TSP Financially Constrained and Planned Transportation Systems (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2). Amendments to support crossings in the vicinity of transit stops are proposed for OCMC 17.62.050(A)(16) (see TSP Volume 2, Section K).
Include Site design standards for new retail, office, multi-family and institutional buildings located near or at major transit stops shown in Figure 2.15 in the RTP: • Provide reasonably direct pedestrian connections between transit stops and building entrances and between building entrances and streets adjoining transit stops; • Provide safe, direct and logical pedestrian crossings at all transit stops where practicable At major transit stops, require the following: • Locate buildings within 20 feet of the transit stop, a transit street or an intersection street, or a pedestrian plaza at the stop or a street intersections; • Transit passenger landing pads accessible to disabled persons to transit agency standards; • An easement or dedication for a passenger shelter and an underground utility connection to a major transit stop if requested by the public transit provider; • Lighting to transit agency standards at the major transit stop; • Intersection and mid-block traffic management improvements as needed and practicable to enable marked crossings at major transit stops. **(Title 1, Transit System Design Sec 3.08.120B(2))**	Existing code and proposed code amendments (TSP Volume 2, Section K) meet these RTFP requirements in the following ways: Subsection A.9 of OCMC 17.62.050, Site Plan and Design Review, establishes extensive criteria for pedestrian circulation on-site. OCMC 17.62.080 specifically addresses development along transit streets, including requirements for maximum setbacks and for all buildings to face the street and to have a direct pedestrian connection with the transit street. OCMC 12.04.260 (Street design—Transit) requires the applicant to coordinate with TriMet when the applicant's site potentially impacts transit streets as identified in the City TSP. Amendments to support crossings in the vicinity of transit stops are proposed for OCMC 17.62.050(A)(16) (see TSP Volume 2, Section K). Standards in both OCMC Chapter 12.04 (Streets, Sidewalks and Public Places) and Chapter 17.62 (Site Plan and Design Review) address street and site plan design to accommodate transit amenities and facilities. OCMC 12.04.260 (Street design—Transit), 17.62.080 (Special development standards along transit streets), and 17.62.050.A.15 of Site Plan and Design Review allow decision makers to require transit-supportive elements such as direct pedestrian and bicycle connections to transit streets and stops, as well as easements, stops, shelters, pullouts, and pads, when the site is

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	adjacent to a designated transit street.
As an alternative to implementing site design standards at major transit stops (section 3.08.120B(2), a city or county may establish pedestrian districts with the following elements: • A connected street and pedestrian network for the district; • An inventory of existing facilities, gaps and deficiencies in the network of pedestrian routes; • Interconnection of pedestrian, transit and bicycle systems; • Parking management strategies; • Access management strategies; • Sidewalk and accessway location and width; • Landscaped or paved pedestrian buffer strip location and width; • Street tree location and spacing; • Pedestrian street crossing and intersection design; • Street lighting and furniture for pedestrians; • A mix of types and densities of land uses that will support a high level of pedestrian activity. **(Title 1, Pedestrian System Design Sec 3.08.130B)**	The "alternative approach" of establishing pedestrian districts, as allowed for in this RTFP requirement, is not necessary. The City's existing and proposed development requirements are transit supportive and consistent with RTFP requirements as demonstrated in the findings above.
Require new development to provide on-site streets and accessways that offer reasonably direct routes for pedestrian travel. **(Title 1, Pedestrian System Design Sec 3.08.130C)**	OCMC 17.62.050.A.9 for Site Plan and Design Review establishes extensive criteria for on-site pedestrian circulation. Pedestrian circulation is also addressed by OCMC Chapter 12.04.199(Pedestrian and Bicycle Accessways).

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
Establish parking ratios, consistent with the following: • No minimum ratios higher than those shown on Table 3.08-3. • Mo maximum ratios higher than those shown on Table 3.08-3 and illustrated in the Parking Maximum Map. If 20-minute peak hour transit service has become available to an area within a one-quarter mile walking distance from bus transit one-half mile walking distance from a high capacity transit station, that area shall be removed from Zone A. Cities and counties should designate Zone A parking ratios in areas with good pedestrian access to commercial or employment areas (within one-third mile walk) from adjacent residential areas. • Establish a process for variances from minimum and maximum parking ratios that include criteria for a variance. • Require that free surface parking be consistent with the regional parking maximums for Zones A and B in Table 3.08-3. Following an adopted exemption process and criteria, cities and counties may exempt parking structures; fleet parking; vehicle parking for sale, lease, or rent; employee car pool parking; dedicated valet parking; user-paid parking; market rate parking; and other high-efficiency parking management alternatives from maximum parking standards. Reductions associated with redevelopment may be done in phases. Where mixed-use development is proposed, cities and counties shall provide for blended parking rates. Cities and counties may count adjacent on-street parking spaces, nearby public parking and shared parking toward required parking minimum standards. Use categories or standards other than those in Table 3.08-3 upon demonstration that the effect will be substantially the same as the application of the ratios in the table. • Provide for the designation of residential parking districts in local comprehensive plans or implementing ordinances. • Require that parking lots more than three acres in size provide street-like features along major driveways, including curbs, sidewalks and street trees or planting	Existing code and proposed code amendments (TSP Volume 2, Section K) meet these RTFP requirements as follows: • Parking ratios and maximums: Current City parking ratios and maximums are presented in Table 17.52.020 of OCMC Chapter 17.52 (Off-Street Parking and Loading) and are consistent with those in RTFP Table 3.08-3, • Creation of of a type II parking reduction for the Downtown Parking Overlay District: (50% reduction in the minimum number of spaces required). Reduction of spaces based on areas that can accommodate a denser development pattern based on existing land use, infrastructure and ability to access the site by means of walking, biking or transit • Variances and exemptions: Creation of a Planning Commission Parking Adjustment Process to provide for flexibility in modifying parking standards in all zoning districts, without permitting an adjustment that would adversely impact the surrounding or planned neighborhood. • Residential parking districts: The City has an exisitng parking permit program. • Parking lot landscaping and pedestrian circulation: OCMC 17.52.060 (Parking lot landscaping) includes requirements for pedestrian accessways, trees, and landscaping along the perimeter and in the interior of parking lots. Proposed amendments require that wide driveways align with existing or planned streets on adjacent sites (TSP Volume 2, Section K). • On-street loading: Proposed amendments to create OCMC 17.52.090, a new section in OCMC Chapter 17.52 (Off-Street Parking and Loading), address off-street and on-street loading and unloading (see TSP Volume 2, Section K). • Long-term bicycle parking: OCMC 17.52.040 (Bicycle parking

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
strips. Major driveways in new residential and mixed-use areas shall meet the connectivity standards for full street connections in section 3.08.110, and should line up with surrounding streets except where prevented by topography, rail lines, freeways, pre-existing development or leases, easements or covenants that existed prior to May 1, 1995, or the requirements of Titles 3 and 13 of the UGMFP. • Require on-street freight loading and unloading areas at appropriate locations in centers. Establish short-term and long-term bicycle parking minimums for: • New multi-family residential developments of four units or more; • New retail, office and institutional developments; • Transit centers, high capacity transit stations, inter-city bus and rail passenger terminals; and • Bicycle facilities at transit stops and park-and-ride lots. **(Title 4, Parking Management Sec 3.08.410)**	standards) addresses the amount of bicycle parking, and parking location and design. The section addresses parking for the uses specified in the RTFP requirement, but it does not specifically address long-term bicycle parking. So it is proposed that OCMC 17.52.040 (Bicycle parking standards) be amended to include requirements for long-term bicycle parking in multi-family, retail, office, institutional, and transit facility development. (See proposed amendments in TSP Volume 2, Section K).

Table 2: Findings of Compliance of the Comprehensive Plan with the RTFP

Regional Transportation Functional Plan Requirement	Findings of Compliance – Comprehensive Plan
When proposing an amendment to the comprehensive plan or to a zoning designation, consider the strategies in subsection 3.08.220A as part of the analysis required by OAR 660-012-0060. If a city or county adopts the actions set forth in 3.08.230E (parking ratios, designs for street, transit, bicycle, pedestrian, freight systems, TSMO projects and strategies, and land use actions) and section 3.07.630.B of Title 6 of the UGMFP, it shall be eligible for an automatic reduction of 30 percent below the vehicular trip generation rates recommended by the Institute of Transportation Engineers when analyzing the traffic impacts, pursuant to OAR 660-012-0060, of a plan amendment in a Center, Main Street, Corridor or Station Community. **(Title 5, Amendments of City and County Comprehensive and Transportation System Plans Sec 3.08.510A,B)**	The strategies and actions in RTFP Sections 3.08.220A and 3.08.230E were integrated into the updated TSP. Instead of the 30% trip reduction offered in RTFP Section 3.08.510, the City is considering designation of a Multimodal Mixed-Use Area (MMA) in Downtown or as part of the Regional Center. The MMA designation, allowed by the Transportation Planning Rule (OAR 660-012-0060(10)), could help address areas that do not currently or are not projected to meet mobility standards. Designation of a MMA would occur as a separate Comprehensive Plan amendment process. In preparation for a potential MMA designation, the OCMC was preliminarily assessed for consistency with MMA requirements that are established in OAR 660-012-0060(10). It was found that existing code meets most of the MMA requirements except for parking provisions. To address this, proposed code amendments to reduce minimum parking requirements for the Downtown Parking Overlay District, which would likely be the core of a MMA along with the creation of a new Planing Commission Parking Adjustment process meets the intent of the MMA standards for minimum parking.(See proposed amendments to OCMC 17.52.20.
Adopt parking policies, management plans and regulations for Centers and Station Communities. Plans may be adopted in TSPs or other adopted policy documents and may focus on sub-areas of Centers. Plans shall include an inventory of parking supply and usage, an evaluation of bicycle parking needs with consideration of *TriMet Bicycle Parking Guidelines*. Policies shall be adopted in the TSP. Policies, plans and regulations must consider and may include the following range of strategies: • By-right exemptions from minimum parking requirements; • Parking districts;	Chapter 17.52 (Off-Street Parking and Loading) of the City code addresses shared parking, bicycle parking, and carpool/vanpool employee parking. The 2009 Downtown Oregon City Parking Study recommends several parking strategies that can be worked into a parking management plan and other implementation strategies.

• Shared parking; • Structured parking; • Bicycle parking; • Timed parking; • Differentiation between employee parking and parking for customers, visitors and patients; • Real-time parking information; • Priced parking; • Parking enforcement. **(Title 4, Parking Management Sec 3.08.410I)**	

Table 3: Findings of Compliance with Oregon Administrative Rule OAR 660 Division 12 Transportation Planning Rule (TPR)

OAR 660-012-0005 through 660-012-0055	Findings of Compliance
660-012-0025(3)(a) *Identify the transportation need for which decisions regarding function, general location or mode are being deferred;*	It is anticipated that 3 intersections will not comply with the automotive mobility standards identified within the Oregon Highway Plan (OHP) through 2035 and it is infeasible or impractical to meet the mobility targets in Table 7 of the OHP. A preliminary analysis of the intersections has been completed and it has been determined that there are no feasible solutions to alter the intersections resulting in compliance with the mobility standards. • I-205/OR 213 Interchange- According to ODOT the redesigned interchange would include construction of additional lanes and bridges, costing $100 million to $200 million. • OR 99E/I-205 Interchange- The City and ODOT agreed that the redesigned interchange would include increasing the capacity of the freeway off-ramps with additional lanes or extending existing lanes, costing $10 million to $30 million or more. Speculation today suggests that the "or more" solutions could include additional travel lanes on I-205 between the Gladstone interchange and the West Linn/Lake

	Oswego interchange. • Beavercreek Road/OR 213 - The 2001 TSP identified a grade-separated interchange costing $20 million. Adjusting for inflation, that same project today would be $26 million. Even in combination, ODOT, Clackamas County, and Oregon City do not have projected funding to implement the $136 million needed to reconstruct the three facilities to comply with the mobility standards. Due to the large cost associated with the improvements, the projects do not appear on the Oregon Highway Plan, the Regional Transportation System Plan or the proposed TSP project list because there is no reasonable likelihood that the projects will be funded. ODOT has made it clear to staff that they would oppose constructing the improvements associated with the intersections and would not contribute any funds for this purpose. ODOT's current revenue projections will be sufficient to cover only the highest priority projects within the region. There is no state or regional funding identified for the three Oregon City locations. Further, neither the OHP, nor the RTP identify any solutions to enhance the function of these three areas. Because funding is not likely to be available to implement these very expensive projects, ODOT recommends that the City undertake additional studies to develop other ways of meeting the City's transportation needs that do not involve major construction projects at these three locations. In addition, these studies may support adoption of alternate mobility standards that allow for a greater level of congestion than is currently allowed by ODOT or is proposed in the TSP. The transportation studies would likely look more broadly at the intersections to identify less costly improvements that provide some increased capacity as well as opportunities to invest in the local network to provide alternative routes and improvements for non-automobile travel in an effort to reduce peak hour trips at the aforementioned intersections. The scope of these additional studies has not been determined and may result in the identification of additional projects that could be added to those already included TSP. As most other jurisdictions in the region are also discovering that insufficient funds will be available to meet mobility standards, additional studies and the adoption of alternate mobility standards that allow for greater levels of congestion will likely be pursued by many jurisdictions. Undertaking such studies and adopting alternate mobility standards, an action that will

	also need to be taken by the Oregon Transportation Commission if it involves state highways, is likely to take 12-24 months to complete. As specified in the Oregon City Municipal Code, most developers are required to conduct a traffic study identifying the traffic impacts of development on proximate intersections throughout the City that are most likely to be more significantly impacted. The Municipal Code requires that if development puts more than 20 new automobile trips through an intersection during the AM or PM peak hour, an analysis is required to demonstrate compliance with mobility standards. As explained above, some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City is proposing to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the three aforementioned locations and all state facilities within or adjacent to the regional center. This temporary exemption would be in effect while the City undertakes more detailed analysis and pursues adoption of an alternate mobility standard over the next 12-24 months. Providing a temporary exemption for permitted and conditional uses with regard to their impact on state highway facilities would align City code requirements with ODOT requirements and other local governments which do not require compliance for any ODOT facility. In addition, the exemption satisfies the City's obligation to implement the state and regional transportation plans as required by state law. Improvements identified in the TSP would be constructed but would not necessarily result in satisfaction of the mobility standards at the locations discussed above. If there are no improvements identified in the TSP associated with an intersection, no improvements would be made at that intersection. Since the aforementioned expensive improvements are not included in the TSP, congestion would be allowed to occur at these locations. Since the expensive improvements at these three key locations are not included in the TSP project list, the current SDC program does not include the collection of any funds to pay for any improvements at these locations.

660-012-0025(3)(b) *Demonstrate why information required to make final determinations regarding function, general location, or mode cannot reasonably be made available within the time allowed for preparation of the TSP;*	Alternative targets were not developed during the TSP update because the amended Policy 1F was not in effect when the TGM grant contract was scoped. Now that the creation of alternate mobility standards is feasible, Oregon City will create an alternate mobility standard for the three intersections identified and receive approval from all necessary bodies. Additional time is needed to allow the creation and adoption of alternate mobility standards as identified by appropriate agencies. The City believes it is possible to have alternate mobility standards and all necessary designations in place within one to two years from adoption of the TSP update.
660-012-0025(3)(c) *Explain how deferral does not invalidate the assumptions upon which the TSP is based or preclude implementation of the remainder of the TSP;*	The recommended policies and projects in the remainder of the TSP will not preclude future decisions about how to address each of the three deficient locations. Capital improvements projects and design standards have been identified for the City's street system, which will allow for development to progress. Interim improvements identified in the TSP are required to partially address the identified problems, but will mainly address safety issues with extensive vehicle queues during peak hours and not limit future design or operational options at the interchange.
660-012-0025(3)(d) *Describe the nature of the findings which will be needed to resolve issues deferred to a refinement plan; and*	The alternate mobility standards are likely to include a combination of adopting alternative mobility targets and an agreed upon set of improvements and/or programs (for safety, connectivity, other modes, TSMO, and TDM). The solutions will likely not result in meeting the mobility target, but will provide reasonable trade-offs between multiple local and state policy objectives including safety, cost/financial feasibility, local land use objectives, and environmental impacts.
660-012-0025(3)(e) *Set a deadline for adoption of a refinement plan prior to initiation of the periodic review following adoption of the TSP.*	The City will peruse further study of the intersections and adoption of the alternate mobility standards over the year or two following adoption of the Transportation System Plan.

OAR 660-012-0045 Implementation of the TSP	**Findings of Compliance**

OAR 660-012-0045 Implementation of the TSP	**Findings of Compliance**
(1) Each local government shall amend its land use regulations to implement the TSP.	
(b) To the extent, if any, that a transportation facility, service, or improvement concerns the application of a comprehensive plan provision or land use regulation, it may be allowed without further land use review if it is permitted outright or if it is subject to standards that do not require interpretation or the exercise of factual, policy or legal judgment.	It is proposed that the OCMC be amended to specify transportation facilities and improvements applicable to permitted uses in its City zoning districts (TSP Volume 2, Section K).
(c) Where a transportation facility, service or improvement is determined to have a significant impact on land use or requires interpretation or the exercise of factual, policy or legal judgment regarding the application of a comprehensive plan or land use regulation, the local government shall provide a review and approval process that is consistent with 660-012-0050 (Transportation Project Development). Local governments shall amend regulations to provide for consolidated review of land use decisions required to permit a transportation project.	Notice provisions in OCMC 17.50.090 (Public notices) already require agencies like TriMet and ODOT to be contacted in cases of legislative applications (Subsection C). The proposed code amendments contain clear and objective criteria for review through a Type I process. IN the casse of adjustments, a Type II process, which includes notice and an opportunity for comment, will be provided.
(2) Local governments shall adopt land use or subdivision ordinance regulations, consistent with applicable federal and state requirements, to protect transportation facilities for their identified functions.	
(a) Access control measures.	Block lengths and spacing standards are addressed by the new street design criteria in the TSP (TSP Volume 1). Text and tables in OCMC 12.04.180 (Street design—OCMC 12.04.195 (Spacing Standards) will provide street design and spacing standards tables from the updated TSP (TSP Volume 2, Section K).
(b) Standards to protect the future operations of roadways and transit corridors	Traffic impact studies are required for subdivisions pursuant to OCMC 16.08.025(B), and are enabled for Site Plan and Design Review in OCMC 17.62.040(I). Mobility standards for roadways in the city are established in the OHP for state roadways, in the RTP and RTFP for regional roadways, and in the City TSP for local roadways (TSP Volume 1,

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
	Section 4, Standards). City mobility standards are proposed to be changed to be more accommodating of peak hour congestion and to not over-design streets so that they are wide and difficult to bike along or to cross. The TSP update is designed to meet performance standards for existing and future development within the UGB, with exceptions. Some intersections on the state highway system cannot be brought into compliance with current ODOT and proposed TSP mobility standards without unreasonably expensive projects for which there is no identified funding. As the City is not required to assure compliance with mobility standards for permitted and conditional uses on state facilities beyond what is identified in the Regional Transportation System Plan, the City proposed to temporarily exempt permitted and conditional uses from complying with the current mobility standards for the interchanges of I-205/99E, I-205/213 and OR 213/Beavercreek Road and all state facilities within or adjacent to the regional cente, as discussed in greater detail above. With no reasonable solution resulting in compliance with mobility standards for these locations, the City has will continue to work with regional partners to pursue special studies and alternate mobility standards for these locations. Minor improvements are anticipated for a majority of the three intersections until the solutions are adopted, likely one to two years after adoption of the Transportation System Plan. Zone change amendment criteria (OCMC 17.68.020) require that sufficient public facilities be provided and that Statewide Planning Goals, such as transportation, be complied with.

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
(d) Coordinated review of future land use decisions affecting transportation facilities, corridors or sites	See response and proposed amendments related to -0045(1)(c).
(e) Process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities	Pursuant to OCMC 17.50.130(A), "(a)ll city decision-makers have the authority to impose reasonable conditions of approval designed to ensure that all applicable approval standards are, or can be, met."
(f) Regulations to provide notice to public agencies providing transportation facilities and services, MPOs, and ODOT of: land use applications that require public hearings, subdivision and partition applications, applications which affect private access to roads, applications within airport noise corridor and imaginary surfaces which affect airport operations.	See response and proposed amendments related to -0045(1)(c).
g) Regulations assuring amendments to land use designations, densities, design standards are consistent with the function, capacities, and levels of service of facilities designated in the TSP.	OCMC 17.68.020(C) requires, for proposed zoning designation amendments, that "(t)he land uses authorized by the proposal are consistent with the existing or planned function, capacity and level of service of the transportation system serving the proposed zoning district."
(3) Local governments shall adopt land use or subdivision regulations for urban areas and rural communities as set forth in 660-012-0040(3)(a-d):	
(a) Provide bicycle parking in multifamily developments of 4 units or more, new retail, office and institutional developments, transit transfer stations and park-and-ride lots	***Addressed by RTFP, Title 4: Regional Parking Management, 3.08.410.I.*** Bicycle parking requirements are established for all uses in Oregon City Municipal Code (OCMC) Section 17.52.040 (Bicycle Parking Standards).
(b) Provide "safe and convenient" (per subsection 660-012-0045.3(d)) pedestrian and bicycle connections from new subdivisions/multifamily development to neighborhood activity centers; bikeways are required along arterials and major collectors; sidewalks are required along arterials, collectors, and most local streets in urban areas except controlled access roadways	***Addressed by RTFP, Title 1: Pedestrian System Design, 3.08.130, and Title 1: Bicycle System Design, 3.08.140*** Section -050 (Standards) of Chapter 17.62 (Site Plan and Design Review) sets requirements for street connectivity and a "well-marked, continuous and protected on-site pedestrian circulation

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
	system." Section 025.B of Chapter 16.08 (Subdivisions – Process and Standards) requires a detailed site circulation plan showing proposed vehicular, bicycle, transit and pedestrian access points and connections to the existing system, and circulation patterns and connectivity to existing rights-of-way or adjacent tracts. Section 12.04.199 (Pedestrian and bicycle accessways) requires pedestrian and bicycle access to activity centers, where this access is not provided via street right-of-way. Roadway cross-sections are provided in OCMC 12.04.180.
(c) Off-site road improvements required as a condition of development approval must accommodate bicycle and pedestrian travel, including facilities on arterials and major collectors	Where off-site improvements are required, the existing roadway cross-sections will govern and currently they require pedestrian and bicycle facilities.
(e) Provide internal pedestrian circulation within new office parks and commercial developments	***Addressed by RTFP, Title 1: Street System Design, 3.08.110E*** Site Plan and Design Review is required for all new non-residential development, as well as conditional uses, cottage housing development, and multi-family uses in all zones Section -050 (Standards) of Chapter 17.62 (Site Plan and Design Review) requires a "well-marked, continuous and protected on-site pedestrian circulation system" for all proposed development.
(4) To support transit in urban areas containing a population greater than 25,000, where the area is already served by a public transit system or where a determination has been made that a public transit system is feasible, local governments shall adopt land use and subdivision regulations as provided in (a)-(g) below:	
(a) Transit routes and transit facilities shall be designed to support transit use through provision of bus stops, pullouts and shelters, optimum road geometrics, on-road parking	***Addressed by RTFP, Title 1: Transit System Design, 3.08.120***

OAR 660-012-0045 Implementation of the TSP	**Findings of Compliance**
restrictions and similar facilities, as appropriate;	Section 12.04.260 (Street design – Transit) requires that streets be designed and constructed in a way that supports pedestrian and bicycle circulation and that applicants coordinate with TriMet when development impacts transit streets identified in Figure 5.7 (Public Transit System Plan) of the TSP. The section allows decision makers to require transit and transit-related facilities where they have been identified and planned.
(b) New retail, office and institutional buildings at or near major transit stops shall provide for convenient pedestrian access to transit through the measures listed in (A) and (B) below. (A) Walkways shall be provided connecting building entrances and streets adjoining the site; (B) Pedestrian connections to adjoining properties shall be provided except where such a connection is impracticable as provided for in OAR 660-012-0045(3)(b)(E). Pedestrian connections shall connect the on site circulation system to existing or proposed streets, walkways, and driveways that abut the property. Where adjacent properties are undeveloped or have potential for redevelopment, streets, accessways and walkways on site shall be laid out or stubbed to allow for extension to the adjoining property;	***Addressed by RTFP, Title 1: Transit System Design, 3.08.120*** Section 12.04.260 (Street design – Transit) requires pedestrian and bicycle accessways be provided to minimize travel distance and support access to transit streets, transit stops, and neighborhood activity centers
(C) In addition to (A) and (B) above, on sites at major transit stops provide the following: (i) Either locate buildings within 20 feet of the transit stop, a transit street or an intersecting street or provide a pedestrian plaza at the transit stop or a street intersection; (ii) A reasonably direct pedestrian connection between the transit stop and building entrances on the site; (iii) A transit passenger landing pad accessible to disabled persons; (iv) An easement or dedication for a passenger shelter if requested by the transit provider; and	***Addressed by RTFP Title 1: Pedestrian System Design, 3.08.130B*** OCMC 12.04.260 (Street design – Transit) requires the applicant to consult with TriMet when the application impacts transit streets.

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
(v) Lighting at the transit stop.	
(d) Designated employee parking areas in new developments shall provide preferential parking for carpools and vanpools;	Subsection E of Section 17.52.030 (Standards for automobile parking) establishes requirements for carpool and vanpool parking that comply with this provision.
(e) Existing development shall be allowed to redevelop a portion of existing parking areas for transit-oriented uses, including bus stops and pullouts, bus shelters, park and ride stations, transit-oriented developments, and similar facilities, where appropriate;	Subsection B of Section 17.52.020 (Number of automobile spaces required) allows for reductions in the required amount of parking in the case of transit-oriented and multi-family housing development. outside of the Downtown Commercial Parking Overlay Districts. Reduction to minimum parking stamdards has been increased up to 50% from 10%. Revised definition of Transit Oriented Development creates a simplified Type II process for reduction.
(f) Road systems for new development shall be provided that can be adequately served by transit, including provision of pedestrian access to existing and identified future transit routes. This shall include, where appropriate, separate accessways to minimize travel distances;	***Addressed by RTFP Title 1: Street System Design, 3.08.110E, and Title 1: Transit System Design, 3.08.120, and Title 1: Pedestrian System Design, 3.08.130*** Section 12.04.260 (Street design – Transit) requires pedestrian and bicycle accessways be provided (in accordance with OCMC Section 12.04.199) to minimize travel distance and support access to transit streets, transit stops, and neighborhood activity centers.
(g) Along existing or planned transit routes, designation of types and densities of land uses adequate to support transit.	Zoning along transit lines in Oregon City is generally consistent with this TPR provision. Line 32 – In downtown Oregon City, this line is adjacent mostly to MUD (Mixed Use Downtown), MUE (Mixed Use Employment), R3.5 (Single Family Residential, minimum 3,500 sf lot), and R6 (Single Family Residential, minimum 6,000 sf lot) zoning. As the line travels south of downtown on Molalla, the zoning is mainly

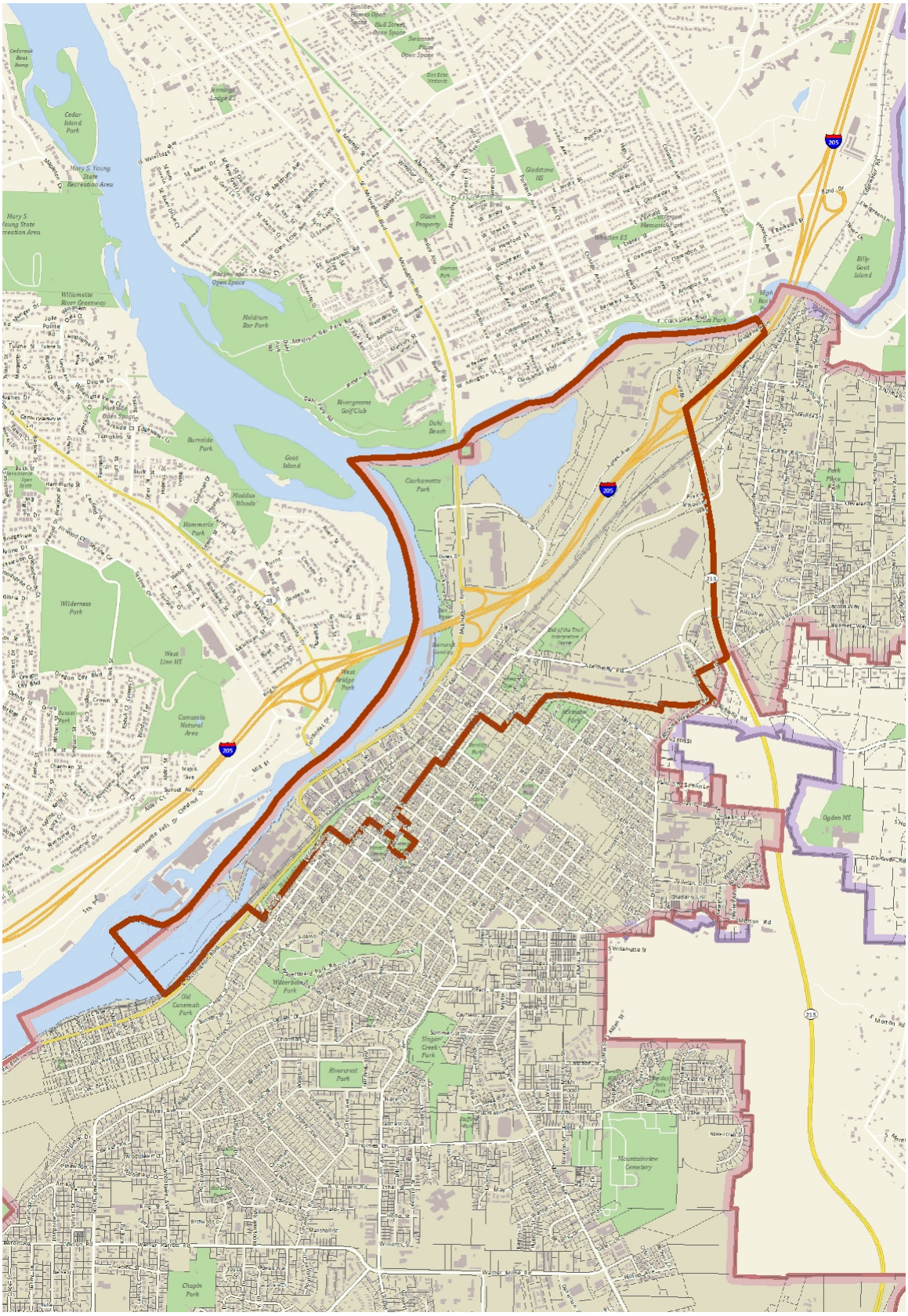
OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
	MUC (Mixed Use Corridor). In reaching its destination of the Clackamas Community College campus, it is surrounded by a mixture of MUC, C (General Commercial), R2 (Single Family Residential, minimum 2,000 sf lot), GI (General Industrial), and I (Institutional) zoning. So the zoning along this line is generally consistent with this TPR provision. It is only the GI zoning that appears inconsistent; however, the route passes this zoning as part of reaching the college campus, so the City Commission finds that this inconsistency is acceptable. Line 33 – In downtown Oregon City, this line is adjacen to primarily MUC, MUD, R3.5, and I zoning. As the route moves south of downtown on Linn, it is surrounded mainly by R2, R6, R8 (Single Family Residential, minimum 8,000 sf lot), and R10 (Single Family Residential, minimum 10,000 sf lot) zoning. Residential areas with minimum lot sizes of 8,000 square feet and 10,000 square feet may be less adequate to support transit. However, this part of the route is located between downtown to the north and MUC, MUE, C, R2, R3.5, and I zoning to the south along Warner Milne, Beavercreek, and Molalla to the Clackamas Community College campus, so again, the City Commission finds this is acceptable to comply with the requirement. Line 34 – This line travels through downtown Oregon City, surrounded primarily by MUD zoning, before heading east/northeast on Abernethy and Holcomb to serve primarily residential areas in this part of the city. The zoning is mainly R 3.5, R6, R8, and R10. Again, R8 and R10 may not be entirely appropriate for transit routing but the route terminates and loops in a large area of R3.5 zoning, whose higher density helps justify the routing of this line. In addition, this route is one that

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
	operates during peak hours only for commuters, further allowing in particular for the range of residential zoning found along it. Line 99 – This line takes its own route on 7th through downtown Oregon City, where it is adjacent to MUC zoning. For the remainder of its route in the city, it coincides with Lines 32 and 33; see the comments pertaining to those routes. Lines 35, 79, and 154 – These three routes enter the city as far as downtown and are adjacent to MUD zoning, which is appropriate for transit routing and service.
(5) In MPO areas, local governments shall adopt land use and subdivision regulations to reduce reliance on the automobile which:	
(a) Allow transit-oriented developments (TODs) on lands along transit routes;	See OAR 660-012-0045(4)(g) above. While not allowed on all land along transit routes in Oregon City, there is a significant amount of mixed use zoning along the routes that will allow this type of development.
(b) Implements a demand management program to meet the measurable standards set in the TSP;	Subsection B of Section 17.52.030 (Number of automobile spaces required) allows for reductions in the required amount of parking in the case of TDM programs. TDM program elements are included in the Financially Constrained and Planned Transportation Systems (TSP Volume 1, Table 5 and TSP Volume 2, Section I, Table 2). The projected performance of these systems is provided in Section 8 (Outcomes) of the TSP.
(c) Implements a parking plan which:	Off-street parking requirements for non-residential uses have been reduced from 1990 levels because Oregon City adopted RTP

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
(A) Achieves a 10% reduction in the number of parking spaces per capita in the MPO area over the planning period. This may be accomplished through a combination of restrictions on development of new parking spaces and requirements that existing parking spaces be redeveloped to other uses; (B) Aids in achieving the measurable standards set in the TSP in response to OAR 660-012-0035(4) [reducing reliance on the automobile]; (C) Includes land use and subdivision regulations setting minimum and maximum parking requirements in appropriate locations, such as downtowns, designated regional or community centers, and transit oriented-developments; and (D) Is consistent with demand management programs, transit-oriented development requirements and planned transit service. ***OR*** (d) As an alternative to (c) above, local governments in an MPO may instead revise ordinance requirements for parking as follows: (A) Reduce minimum off-street parking requirements for all non-residential uses from 1990 levels; (B) Allow provision of on-street parking, long-term lease parking, and shared parking to meet minimum off-street parking requirements; (C) Establish off-street parking maximums in appropriate locations, such as downtowns, designated regional or community centers, and transit-oriented developments; (D) Exempt structured parking and on-street parking from parking maximums; (E) Require that parking lots over 3 acres in size provide street-like features along major	parking ratios as part of its last TSP update. Off-street parking is allowed according to roadway cross-sections and Subsection 17.52.020(B)(3) and (5) make provisions for shared parking and off-street parking. Section and Table 17.52.020 (Number of automobile spaces required) establish both minimum and maximum parking space requirements. No exemptions are made for structured parking. Structured parking is a conditional use subject to other review and requirements. Section 17.52.060 (Parking lot landscaping) sets standards for walkways/sidewalks and landscaping the perimeters and interiors of parking areas. Residential parking districts can be established through an existing permit parking program.

OAR 660-012-0045 Implementation of the TSP	**Findings of Compliance**
driveways (including curbs, sidewalks, and street trees or planting strips); and (F) Provide for designation of residential parking districts.	
(e) Require all major industrial, institutional, retail and office developments to provide either a transit stop on site or connection to a transit stop along a transit trunk route when the transit operator requires such an improvement.	Section 12.04.260 (Street design – Transit) requires that applicants coordinate with TriMet when development impacts transit streets identified in Figure 5.7 (Public Transit System Plan) of the TSP.
OAR 660-012-0060 Plan and Land Use Regulation Amendments	**Findings**
Amendments to functional plans, acknowledged comprehensive plans, and land use regulations that significantly affect an existing or planned transportation facility shall assure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility.	OCMC 17.68.020(C) requires, for proposed amendments, that "(t)he land uses authorized by the proposal are consistent with the existing or planned function, capacity and level of service of the transportation system serving the proposed zoning district."

Oregon City Regional Center

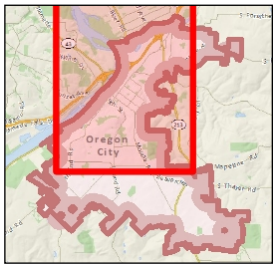


Legend

- Taxlots
- Regional Center (1998)
- City Limits
- UGB

Notes

Overview Map



The City of Oregon City makes no representations, express or implied, as to the accuracy, completeness and timeliness of the information displayed. This map is not suitable for legal, engineering, surveying or navigation purposes. Notification of any errors is appreciated.

N

0 2,431 Feet

1: 29,166

City of Oregon City
PO Box 3040
625 Center St
Oregon City
OR 97045
(503) 657-0891
www.orcity.org

Map created 6/7/2013

Exhibit 3