



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 -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
<p>Allow complete street designs consistent with regional street design policies (Title 1, Street System Design Sec 3.08.110A(1))</p>	<p>Existing code and the updated TSP (Exhibit 1) meet these RTFP requirements in the following ways.</p>
<p>Allow green street designs consistent with federal regulations for stream protection (Title 1, Street System Design Sec 3.08.110A(2))</p>	<p>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.</p>
<p>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))</p>	<p>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.</p> <p>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, Exhibit 1; TSP Volume 2, Section K, OCMC Tables 12.04.180-183, Exhibit 1).</p>
<p>Allow implementation of:</p> <ul style="list-style-type: none"> ● 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; 	<p>Existing code, proposed code amendments (TSP Volume 2, Section K, Exhibit 1), and the updated TSP (Exhibit 1) meet these RTFP requirements as follows:</p> <ul style="list-style-type: none"> ● 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, Exhibit 1) 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

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<ul style="list-style-type: none"> Opportunities to extend streets in an incremental fashion, including posted notification on streets to be extended. <p>(Title 1, Street System Design Sec 3.08.110B)</p>	<p>pavement widths and street design. A landscape strip, sidewalk, a public access is required for all streets. OCMC 12.04.265 (Street design—Planter strips) and the TSP address planting strips.</p> <p>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.</p> <p>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, Exhibit 1).</p> <ul style="list-style-type: none"> 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.”

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	<p>Multimodal circulation within a site or land division is supported 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.</p> <p>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".</p> <p>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).</p> <p>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.</p> <ul style="list-style-type: none"> • 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

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	<p>pedestrian access easements where applicable.” For land 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.”</p> <p>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, Exhibit 1).</p>
<p>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:</p> <ul style="list-style-type: none"> ● 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 <p>(Title 1, Street System Design Sec 3.08.110E)</p>	<p>Existing code and proposed code amendments (TSP Volume 2, Section K, Exhibit 1) meet these RTFP requirements as follows:</p> <ul style="list-style-type: none"> ● 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, Exhibit 1 for proposed amendments). ● 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

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
<p>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).</p> <p>(Title 1, Street System Design Sec 3.08.110F)</p>	<p>requirement (see TSP Volume 2, Section K, Exhibit 1). OCMC 12.04.225 (Pedestrian and bicycle accessways) requires pedestrian and bicycle accessways from cul-de-sacs.</p> <p>Existing code language meets this requirement. Preliminary plat standards for subdivisions in OCMC 16.08.025.B require a transportation plan 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 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, as well as required connections with future adjacent development (OCMC 12.04.196, and 17.62.050.A.2.f).</p>
<p><u>Applicable to both Development Code and TSP</u></p> <p>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.</p> <p>(Title 1, Street System Design Sec 3.08.110G)</p>	<p>Existing code, proposed code amendments (TSP Volume 2, Section K, Exhibit 1), and the updated TSP (Exhibit 1) meet this RTFP requirement in the following ways.</p> <p>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.</p> <p>Proposed street spacing standards (TSP Volume 1, OCMC 12.04.195, Exhibit 1) 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</p>

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
	<p>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).</p> <p>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, Exhibit 1). 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, Exhibit 1).</p>
<p>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:</p> <ul style="list-style-type: none"> ● 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 <p>At major transit stops, require the following:</p> <ul style="list-style-type: none"> ● 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; 	<p>Existing code and proposed code amendments (TSP Volume 2, Section K, Exhibit 1) meet these RTFP requirements in the following ways.</p> <p>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.</p> <p>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, Exhibit 1).</p> <p>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</p>

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
<ul style="list-style-type: none"> • Intersection and mid-block traffic management improvements as needed and practicable to enable marked crossings at major transit stops. <p>(Title 1, Transit System Design Sec 3.08.120B(2))</p>	<p>(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 adjacent to a designated transit street.</p>
<p><u>(Could be in Comprehensive plan or TSP as well)</u> 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:</p> <ul style="list-style-type: none"> • 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. <p>(Title 1, Pedestrian System Design Sec 3.08.130B)</p>	<p>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.</p>
<p>Require new development to provide on-site streets and accessways that offer</p>	<p>OCMC 17.62.050.A.9 for Site Plan and Design Review establishes</p>

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<p>reasonably direct routes for pedestrian travel.</p> <p>(Title 1, Pedestrian System Design Sec 3.08.130C)</p>	<p>extensive criteria for on-site pedestrian circulation. Pedestrian circulation is also addressed by OCMC Chapter 12.04.199(Pedestrian and Bicycle Accessways).</p>
<p>Establish parking ratios, consistent with the following:</p> <ul style="list-style-type: none"> ● No minimum ratios higher than those shown on Table 3.08-3. ● No 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. <p>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.</p> <ul style="list-style-type: none"> ● Provide for the designation of residential parking districts in local comprehensive 	<p>Existing code and proposed code amendments (TSP Volume 2, Section K, Exhibit 1) meet these RTFP requirements as follows:</p> <ul style="list-style-type: none"> ● 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 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 existing 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, Exhibit 1).

Regional Transportation Functional Plan Requirement	Findings of Compliance – Municipal Code
<p>plans or implementing ordinances.</p> <ul style="list-style-type: none"> 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 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. <p>Establish short-term and long-term bicycle parking minimums for:</p> <ul style="list-style-type: none"> 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. <p>(Title 4, Parking Management Sec 3.08.410)</p>	<ul style="list-style-type: none"> 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, Exhibit 1). Long-term bicycle parking: OCMC 17.52.040 (Bicycle parking 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, Exhibit 1).

Table 3: Findings of Compliance of the Comprehensive Plan with the RTFP

Regional Transportation Functional Plan Requirement	Findings of Compliance – Comprehensive Plan
<p>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.</p> <p>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.</p> <p>(Title 5, Amendments of City and County Comprehensive and Transportation System Plans Sec 3.08.510A,B)</p>	<p>The strategies and actions in RTFP Sections 3.08.220A and 3.08.230E were integrated into the updated TSP.</p> <p>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.</p> <p>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.</p>
<p><i>(Could be located in TSP or other adopted policy document)</i></p> <p>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 <i>TriMet Bicycle Parking Guidelines</i>. Policies shall be adopted in the TSP. Policies, plans and regulations must consider and may include the following range of strategies:</p>	<p>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.</p>

- By-right exemptions from minimum parking requirements;
- Parking districts;
- 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 2: Findings of Compliance with the TPR

OAR 660-012-0005 through 660-012-0055	Findings of Compliance
<p>660-012-0025(3)(a) <i>Identify the transportation need for which decisions regarding function, general location or mode are being deferred;</i></p>	<p>It is anticipated that 4 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.</p> <ul style="list-style-type: none"> • I-205 / OR 99E interchange – The solution requires adding additional lanes to the interchange and Interstate 205 which are not financially feasible. The existing single lane on and off-ramps would have to be expanded to multiple lanes, which may create the need for a new interchange design and / or expansion of the freeway mainline on either side of the interchange. This would be a major new capital

	<p>project for ODOT, and it would require further study to select the best design given the physical and environmental constraints at this location.</p> <ul style="list-style-type: none"> • I-205 / OR 213 interchange – The solution requires adding additional lanes to the interchange and Interstate 205 which are not financially feasible. The existing single lane on and off-ramps would have to be expanded to multiple lanes, which may create the need for a new interchange design and / or expansion of the freeway mainline on either side of the interchange. This would be a major new capital project for ODOT, and it would require further study to select the best design given the physical and environmental constraints at this location. • OR 99E (McLoughlin Blvd.) at Main Street – The location is severely constrained by existing land development, and it is adjacent to a tunnel, which goes under an elevated Union Pacific Rail line. The solution requires adding additional lanes on approaches to the intersection, which are not financially feasible. • OR 213 at Beaver Creek Road – The solution entails constructing a full or partial grade separated intersection. A full interchange project is identified in our current TSP (adopted in 2001) as a \$20 million project and in a 2009 SDC report, the project is listed at \$20 million and is not eligible for SDC fees. The project was taken out of the proposed TSP because the solution is not feasible due to cost, the land needed for the improvement has been primarily developed, and the solution would create significant difficulties for pedestrians and bicycles. <p>ODOT has indicated that they do not have the funding or desire to create a solution while Oregon City does not have the funding or the desire to create a solution for the ODOT facilities.</p>
<p>660-012-0025(3)(b) <i>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;</i></p>	<p>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 four intersections identified and receive approval from all necessary bodies. Additional time is needed to allow the creation and adoption of alternate</p>

	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 year 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 four deficient locations. Capital improvements projects and design standards have been identified for the City's street system, which will allow for development to progress. On the State system, interim improvements are recommended for the I-205 / OR 99E ramps 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 following adoption of the Transportation System Plan.

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 as permitted uses in its City zoning districts (TSP Volume 2, Section K, Exhibit 1).

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
<p>(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.</p>	<p>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).</p>
<p>(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.</p>	
<p>(a) Access control measures.</p>	<p>Block lengths and spacing standards are addressed by the new street design criteria in the TSP (TSP Volume 1, Exhibit 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, Exhibit 1).</p>
<p>(b) Standards to protect the future operations of roadways and transit corridors</p>	<p>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, 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. Investing in the transportation system improvements that are recommended in the TSP Financially Constrained and Planned Transportation</p>

OAR 660-012-0045 Implementation of the TSP	Findings of Compliance
	<p>System Plans (Table 5 in the TSP Volume 1 and Table 2 in TSP Volume 2, Section I, Exhibit 1) and implementing transportation demand management programs in the employment growth areas in the city are 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 intersections of OR 99E and the I-205 ramps and OR 213/Beavercreek Road. The recommended solutions are projected to meet performance targets throughout the city, with the exception of the intersections of OR 99E and the I-205 ramps, 99E near the tunnel and at OR 213/Beavercreek Road. The intersections are all located within Oregon Department of Transportation (ODOT) right-of-way. 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 some of the four intersections until the solutions are adopted, likely one year after adoption of the Transportation System Plan.</p> <p>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.</p>
(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	See response and proposed amendments related to -0045(1)(c).

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<p>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.</p>	
<p>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.</p>	<p>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.”</p>
<p>(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):</p>	
<p>(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</p>	<p>Addressed by RTFP, Title 4: Regional Parking Management, 3.08.410.I.</p> <p>Bicycle parking requirements are established for all uses in Oregon City Municipal Code (OCMC) Section 17.52.040 (Bicycle Parking Standards).</p>
<p>(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</p>	<p>Addressed by RTFP, Title 1: Pedestrian System Design, 3.08.130, and Title 1: Bicycle System Design, 3.08.140</p> <p>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 system.”</p> <p>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.</p> <p>Section 12.04.199 (Pedestrian and bicycle accessways) requires</p>

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	<p>pedestrian and bicycle access to activity centers, where this access is not provided via street right-of-way.</p> <p>Roadway cross-sections are provided in OCMC 12.04.180.</p>
(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	<p>Addressed by RTFP, Title 1: Street System Design, 3.08.110E</p> <p>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.</p>
(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 restrictions and similar facilities, as appropriate;	<p>Addressed by RTFP, Title 1: Transit System Design, 3.08.120</p> <p>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.</p>

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<p>(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.</p> <p>(A) Walkways shall be provided connecting building entrances and streets adjoining the site;</p> <p>(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;</p>	<p>Addressed by RTFP, Title 1: Transit System Design, 3.08.120</p> <p>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</p>
<p>(C) In addition to (A) and (B) above, on sites at major transit stops provide the following:</p> <p>(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;</p> <p>(ii) A reasonably direct pedestrian connection between the transit stop and building entrances on the site;</p> <p>(iii) A transit passenger landing pad accessible to disabled persons;</p> <p>(iv) An easement or dedication for a passenger shelter if requested by the transit provider; and</p> <p>(v) Lighting at the transit stop.</p>	<p>Addressed by RTFP Title 1: Pedestrian System Design, 3.08.130B</p> <p>OCMC 12.04.260 (Street design – Transit) requires the applicant to consult with TriMet when the application impacts transit streets.</p>
<p>(d) Designated employee parking areas in new developments shall provide preferential parking for carpools and vanpools;</p>	<p>Subsection E of Section 17.52.030 (Standards for automobile parking) establishes requirements for carpool and vanpool parking that comply with this provision.</p>
<p>(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;</p>	<p>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</p>

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	development. outside of the Downtown Commercial Parking Overlay Districts. Reduction to minimum parking standards 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;	<p>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</p> <p>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.</p>
(g) Along existing or planned transit routes, designation of types and densities of land uses adequate to support transit.	<p>Zoning along transit lines in Oregon City is generally consistent with this TPR provision.</p> <p>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 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 this inconsistency may be</p>

acceptable in this case.

Line 33 – In downtown Oregon City, this line is adjacent mostly to 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, Beaver creek, and Molalla to the Clackamas Community College campus, so again this may be acceptable overall.

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 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

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	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: (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	A parking management plan will be addressed in TSP policy as a plan to be prepared for Downtown/the Regional Center. <u>OR</u> Off-street parking requirements for non-residential uses have been reduced from 1990 levels because Oregon City adopted RTP 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

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<p>requirements in appropriate locations, such as downtowns, designated regional or community centers, and transit oriented-developments; and</p> <p>(D) Is consistent with demand management programs, transit-oriented development requirements and planned transit service.</p> <p><u>OR</u></p> <p>(d) As an alternative to (c) above, local governments in an MPO may instead revise ordinance requirements for parking as follows:</p> <p>(A) Reduce minimum off-street parking requirements for all non-residential uses from 1990 levels;</p> <p>(B) Allow provision of on-street parking, long-term lease parking, and shared parking to meet minimum off-street parking requirements;</p> <p>(C) Establish off-street parking maximums in appropriate locations, such as downtowns, designated regional or community centers, and transit-oriented developments;</p> <p>(D) Exempt structured parking and on-street parking from parking maximums;</p> <p>(E) Require that parking lots over 3 acres in size provide street-like features along major driveways (including curbs, sidewalks, and street trees or planting strips); and</p> <p>(F) Provide for designation of residential parking districts.</p>	<p>shared parking and off-street parking.</p> <p>Section and Table 17.52.020 (Number of automobile spaces required) establish both minimum and maximum parking space requirements.</p> <p>No exemptions are made for structured parking. Structured parking is a conditional use subject to other review and requirements.</p> <p>Section 17.52.060 (Parking lot landscaping) sets standards for walkways/sidewalks and landscaping the perimeters and interiors of parking areas.</p> <p>Residential parking districts can be established through an existing permit parking program.</p>
<p>(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.</p>	<p>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.</p>

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.”

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