STAFF REPORT

CONSIDERATION OF ORDINANCE NO. 00-869A FOR THE PURPOSE OF ADOPTING THE 2000 REGIONAL TRANSPORTATION PLAN; AMENDING ORDINANCE NO. 96-647C AND ORDINANCE NO. 97-715B

Date: June 29, 2000 Presented by: Andrew C. Cotugno

PROPOSED ACTION

This ordinance would adopt the 2000 Regional Transportation Plan (RTP) as the regional functional plan for transportation, as required by ORS 268.390, and would bring the RTP into compliance with the state Transportation Planning Rule (TPR). The 2000 RTP includes:

- RTP Policies - Chapter 1 of the RTP was initially approved by Council resolution in July 1996. It has since been updated for consistency with the Regional Framework Plan and the functional plan, and edited for readability and brevity. This action will also amend Ordinance No. 97-715B, replacing Chapter 2 of the Regional Framework Plan with the update Chapter 1 of the RTP.

- RTP Projects and Systems Analysis - Chapters 2 through 5 of the RTP identify the 20-year transportation needs for the region, detail the scope and nature of proposed improvements that address the 20-year needs and a financial plan for implementing the recommended projects. Chapter 5 includes a description of the strategic system, which is intended to satisfy the state TPR requirements for an "adequate" system, as well as procedures and criteria in Chapter 6 for amending the projects.

- RTP Implementation - Chapter 6 of the RTP establishes regional compliance with state and federal planning requirements, and sets requirements for city and county compliance with the RTP. This chapter also establishes criteria for amending the RTP project lists, and the relationship between the RTP and the Metro Transportation Improvement Program (MTIP). Chapter 6 also identifies future studies needed to refine the RTP as part of future updates. These future studies are consistent with state TPR provisions that require refinement planning in areas where a transportation need exists, but further analysis is required to define specific solutions.

EXISTING LAW

The current federal Transportation Equity Act for the 21st century (TEA-21) requires an updated federal plan every three years that demonstrates continued compliance with the fifteen federal planning factors, a financially constrained plan and compliance with the Clean Air Act.

FACTUAL BACKGROUND AND ANALYSIS

The RTP update has been conducted in three stages over the past four years. The first stage involved an update to the RTP policies that focused on implementing the 2040 Growth Concept, and reflected new state and federal planning requirements. The policy document was approved by Council resolution in July 1996, and has served as the guiding vision for later steps in the update process.

The second stage of the RTP update, known as the RTP alternatives analysis, examined the region's level of service policy for motor vehicles and transit. This stage led to the 2040-based congestion policy that has since been adopted as part of Title 6 of the Urban Growth Management Functional Plan.

The lessons learned from RTP alternatives analysis helped guide the final, project development stage of the RTP update. The project development phase included a system analysis, proposed 20-year transportation solutions, and financial strategies for implementing the plan. This element of the plan, together with the RTP policies approved by resolution in July 1996 and transportation elements of the Regional Framework Plan and the Urban Growth Management Functional Plan (UGMFP) in 1998, completes the effort to update the RTP to implement the 2040 growth concept.

The RTP update featured a greatly expanded public outreach effort. The update was guided by a 21-member Citizen Advisory Committee (CAC), and included several public outreach efforts, special newsletters, and a number of joint JPACT, MPAC and Council workshops held at key decision points. The update also reflects the efforts of local officials, citizens and staff to develop transportation proposals that reflect the policy direction developed by the CAC and regional growth management policies. Of the nearly 700 projects proposed through the year 2020 to address expected growth, and to implement the 2040 growth concept, more than half are new to the regional plan, and many were generated by citizen input. These projects range from relatively modest bicycle and pedestrian improvements to major transit and highway projects, each developed with an eye toward promoting safety, responding to growth or leveraging the 2040 growth concept.

During the past year, staff tested these projects through four separate rounds of transportation modeling. Each project proposed in the 2000 RTP was reflected in the modeling assumptions, and projects were further refined after each round of modeling to better respond to projected travel needs during the 20-year plan period. This phase of the RTP update was also based on a collaborative approach, with local jurisdictions overseeing the modeling process at every step, and modeling analysis completed in a series of workshops with the regional partners. As a result, the draft project list is a consensus-based product, with project recommendations that are based on detailed analysis.

In December 1999, JPACT and the Metro Council approved the draft 1999 RTP by resolution, with direction to staff to complete a final set of analyses prior to adoption of the plan by ordinance. The December 1999 draft is included in Exhibit "A." During the past five months, staff completed the following activities necessary to demonstrate compliance with regional, state and federal planning requirements:

- development, modeling and analysis of the financially constrained network
- preliminary air quality conformity findings
- completion of an off-peak congestion analysis
- findings that demonstrate compliance with state TPR requirements
- findings that demonstrate compliance with federal TEA-21 planning requirements
- draft revisions to the Regional Framework Plan to maintain consistency between RTP and RFP policies
- draft revisions to Title 2 of the UGMFP, as required by the state TPR

The results of these tasks are included in the May 15, 2000 Supplemental Revisions document, which is included as ~~part of~~ Exhibit "~~A~~B." A final 45-day public comment period was held from May 15 through June 29, 2000. JPACT recommendations on public comments received during that time period are included in Exhibit "C." Draft revisions to Title 2 and Title 10 of the Urban Growth Management Functional Plan are included in Exhibit "D." Findings of compliance with state TPR requirements are shown in Exhibit "~~B~~E."

BUDGET IMPACT

None.

TK:rmb
C\Resolutions\2000\00-869A SR.doc

BEFORE THE METRO COUNCIL

| | | |
|---|---|---|
| FOR THE PURPOSE OF ADOPTING THE 2000 REGIONAL TRANSPORTATION PLAN; AMENDING ORDINANCE NO. 96-647C AND ORDINANCE NO. 97-715B | ) ) ) ) | ORDINANCE NO. 00-869A<br><br>Introduced by Councilor Kvistad |

WHEREAS, Metro's 1989 Regional Transportation Plan ("RTP"), the 1992 RTP Update and this 2000 RTP Update are being adopted as the regional functional plan for transportation under ORS 268.390 and the regional "metropolitan transportation plan" required by federal law as the basis for coordinating federal transportation expenditures superceding the Interim Federal Regional Transportation Plan adopted by resolution in 1995; and

WHEREAS, new federal requirements under ISTEA resulted in adoption of a separate federal plan entitled "Interim Federal Regional Transportation Plan," July 1995 in Resolution No. 95-2138A, which is now updated in 2000 RTP Update and adopted as Resolution No. 00-2969A; and

~~WHEREAS, the current federal Transportation Equity Act for the 21st century ("TEA-21") requires an updated federal plan every three years that demonstrates continued compliance with the fifteen federal planning factors, a "financially constrained" plan and compliance with the Clean Air Act; and~~

WHEREAS, this 2000 RTP Update, adopted by Ordinance, together with portions of the 1996 Urban Growth Management Functional Plan are intended to serve as the regional Transportation System Plan ("TSP") required by the state Transportation Planning Rule; and

WHEREAS, the regional TSP which must be consistent with the state Transportation Systems Plan, including the 1992 Oregon Transportation Plan and the 1999 Oregon Highway Plan; and

WHEREAS, all functional plans, including this 2000 RTP Update, must implement applicable regional goals and objectives, including Metro's acknowledged 2040 Growth Concept; and

WHEREAS, the 2000 RTP Update is adopted herein as a component of the 1997 Regional Framework Plan ; and

WHEREAS, development of this 2000 RTP Update has included adoption of regional transportation policies to begin implementation of the 2040 Growth Concept in Resolution 96-2327, Title 6 requirements for changes to local transportation plans in the 1996 Urban Growth Management Functional Plan, and inclusion of regional transportation policies in the 1997 Regional Framework Plan; and

~~WHEREAS, a final public comment draft of the 1999 RTP Update, adopted by resolution, was distributed in October, 1999 with seven subregional area summaries of policies and projects affecting local areas ; and~~

WHEREAS, the Metro Council has received ~~the~~ and considered the advice of a 21-member Citizens Advisory Committee, its Metro Policy Advisory Committee, and Joint Policy Advisory Committee on Transportation, and all the policies and projects have been the subject of extensive public reviews; and

WHEREAS, Resolution No. 99-2878B stated the process for ~~its~~ refinement and implementation ~~accepted~~ of the ~~final November 5, 1999~~December 16, 1999~~.~~ draft of the 1999 Regional Transportation Plan as amended, to be adopted by ordinance with final changes as the 2000 Regional Transportation Plan for federal, state, and regional functional plan purposes; and

WHEREAS, Chapter 6 of this 2000 RTP has been significantly amended based on further analysis and demonstration of compliance with the state Transportation Planning Rule prior to adoption of this 2000 RTP Update by Ordinance ; and

WHEREAS, Chapter 1 of the 2000 RTP containing RTP policies was initially approved by Council resolution in July 1996, ~~and~~ updated in ~~1999 for consistency with~~ the 1997 Regional Framework Plan, and revised in this Ordinance to replace policy provisions of Chapter 2 of the Regional Framework Plan; and

WHEREAS, Chapters 2 and 5 of the 2000 RTP identify the 20-year transportation needs of the region detail the scope and nature of proposed improvements that address the 20-year needs and a financial plan for implementing the recommended projects; and

WHEREAS, Chapter 6 of the 2000 RTP establishes regional compliance with state and federal planning requirements and establishes ~~any~~ regional TSP and functional plan requirements for city and county comprehensive plans and local TSPs to comply with the 2000 RTP; and

WHEREAS, the ~~congestion and street connection policies~~requirements adopted in Title 6 of the Urban Growth Management Functional Plan to implement Metro's acknowledged 2040 Growth Concept are now included in the 2000 RTP as the primary transportation functional plan with the same compliance timelines as originally adopted; and

WHEREAS, regulatory issues have been addressed before final adoption of the RTP by ordinance, including findings of compliance with the state Transportation Planning Rule, federal planning requirements in TEA-21, development of the "financially constrained" system for purposes of federal air quality conformity; and

WHEREAS, Exhibit "A" of this ordinance contains ~~the 2000 RTP in the form of~~ the final 1999 draft adopted by resolution ~~and the 2000 addenda of revisions~~; and

WHEREAS, Exhibit "B" of this ordinance contains the May 15, 2000 Supplemental Revisions to Exhibit "A;" and

WHEREAS, Exhibit "C" of this ordinance contains the July 13, 2000 JPACT recommendations on public comments received during the final 45-day public comment period; and

WHEREAS, Exhibit "D" of this ordinance contains the amended Titles 2 and 10 of the Urban Growth Management Functional Plan; and

WHEREAS, Exhibit "~~B~~E" contains the Findings of Fact and Conclusions of Law which explain the factual basis for the Plan and include governmental coordination findings and required by the court to comply with statewide planning Goal 2 and in *Parklane et al v. Metro*; and

WHEREAS, the 2000 Regional Transportation Plan Appendix ~~of documents~~ and other supporting documents have been included in the decision record before the Metro Council; now, therefore,

THE METRO COUNCIL ORDAINS AS FOLLOWS:

Section 1. The 2000 Regional Transportation Plan ("RTP"), includes the December 16, 1999 RTP, ~~-~~attached as Exhibit "A," the May 15, 2000 Supplemental Revisions, attached as Exhibit "B" and the July 13, 2000 JPACT Recommendations, attached as Exhibit "C", is incorporated by reference herein ~~is~~ and hereby adopted as Metro's regional transportation functional plan under ORS 268.390(2)~~, and~~.

Section 2. The 2000 RTP together with amended Titles 2 and 10 of the Urban Growth Management Functional Plan, attached as Exhibit "D," is hereby adopted as the

Regional Transportation System Plan under the Transportation Planning Rule at OAR 660-012-010.

Section ~~2~~3. The Findings of Fact and Conclusions of Law in Exhibit "~~B~~E" attached and incorporated herein are hereby adopted as explanation of the factual basis for the 2000 RTP governmental coordination findings for the Plan and findings required by the Transportation Planning Rule.

Section ~~3~~4. Ordinance No. 97-715B is amended to replace Policies 2.1 through 2.30, Regional Systems Maps, Background and Analysis provisions in Chapter 2 with the Introduction and Sections 1.0 through 1.37 of ~~add~~ the 2000 RTP, which becomes the revised Chapter 2 of the Regional Framework Plan ~~to the Regional Framework Plan as the transportation component~~.

Section 5. Ordinance No. 97-715B is further amended to include the 2000 RTP in the Regional Framework Plan Appendix to implement Chapter 2 of the Regional Framework Plan.

Section ~~4~~6. Ordinance No. 96-647C is hereby amended to remove Title 6 from the Urban Growth Management Functional Plan. The compliance timelines and the extensions of Title 8 of the Urban Growth Management Functional Plan shall continue to apply to these functional plan requirements. ~~and amend Title 2 as shown in Exhibit "C" attached and incorporated herein.~~

Section 7. Ordinance No. 96-647C is hereby amended to revise Titles 2 and 10 of the Urban Growth Management Functional Plan as shown in Exhibit "D" attached and incorporated herein.

Section ~~5~~8. The 2000 RTP in Exhibits "A, "B", "C" and "D," to be considered together with Title 2 of the Urban Growth Management Functional Plan as amended in this ordinance, shall be transmitted to the Land Conservation and Development Commission for

initial acknowledgment ~~of compliance with the statewide planning goals~~ as the transportation component of the Regional Framework Plan for compliance with the statewide planning goals consistent with ORS 197.274(1)(a).

ADOPTED by the Metro Council this _____ day of _____, 2000.

_____
David Bragdon, Presiding Officer

ATTEST:

_____
Recording Secretary

Approved as to Form:

_____
Daniel B. Cooper, General Counsel

C\Resolutions\2000\00-869A.doc rmb

i:\R-O\2000RTPOrd.001.doc
OGC/LSS/kvw (06/20/2000)

**Exhibit A**
**to Ordinance No. 00-869A**

Submitted as a placeholder for the completed
2000 Regional Transportation Plan
are the

**December 16, 1999**
**Adoption Draft**

**Exhibit B**
**to Ordinance No. 00-869A**

Submitted as a placeholder

**May 15, 2000**
**Supplemental Revisions**

# Exhibit C, the July 13, 2000, JPACT Recommendations On Public Comments Received During the Final 45-Day Public Comment Period

**Exhibit D**
**to Ordinance No. 00-869A**

# Amended Titles 2 and 10
# of the
# Urban Growth Management Functional Plan

# TITLE 23 - UNITED STATES CODE
# SECTION 134 - METROPOLITAN PLANNING

The following are intended to explain how the Regional Transportation Plan ("RTP") comply with applicable requirements of Section 134 in general. These findings are a roadmap to the decision record for this multi-year planning effort. Inapplicable subsections of Section 134 are not cited in these findings.

## 134(d)(2)(A-B) Interstate Compacts

> *"The consent of Congress is granted to any 2 or more States to enter into agreements or compacts, not in conflict with any law of the United States, for cooperative efforts and mutual assistance in support of activities authorized under this section as the activities pertain to inter-state areas and localities within the States and to establish such agencies, joint or otherwise, as the States may determine desirable for making the agreements and compacts effective."*

Metro has entered into an intergovernmental agreement with the Regional Transportation Commission ("RTC"), the MPO for Clark County, Washington. The RTC is represented on Metro's Transportation Policy Alternatives Committee ("TPAC") and Joint Policy Advisory Committee on Transportation ("JPACT"). Likewise, Metro is represented on RTC technical and policy advisory committees. The function of Metro's interagency coordinating committees is described in Section 1.3.1 of the 2000 Regional Transportation Plan ("RTP").

## 134(e)(2) Project Located in Multiple MPOs

> *"If a project is located within the boundaries of more than 1 metropolitan planning organization, the metropolitan planning organizations shall coordinate plans regarding the project."*

Several projects in the I-205 and I-5 highway corridors, including transit improvements, are near the MPO boundary, or span the Metro and RTC MPOs. These projects are listed in Appendix 1.1 of the 2000 RTP. Metro has coordinated these projects with the RTC through the membership of TPAC and JPACT.

## 134(f)(1) Metropolitan Planning Factors

This section requires that the metropolitan transportation planning process for a metropolitan area under this section shall provide for consideration of projects and strategies that will satisfy the planning factors (A) through (G), below.

**134(f)(1)(A) Plan Supports Economic Viability**

> *"Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency."*

The policy component of the 2000 RTP is structured around the implementation of the Region 2040 Growth Concept through strategic transportation improvements. As the economic engines of the region's economy, the Portland central city, six regional centers, the region's industrial areas and intermodal facilities are identified as the primary areas for transportation investments (Section 1.2.1).

Transportation improvements in these primary components of the 2040 Growth Concept are also guided by a set of functional maps that establish a series of efficient, high-quality motor vehicle, freight, transit, bicycle and pedestrian systems that are similarly designed to reinforce the growth concept (Section 1.3.5)

The 2020 population and employment forecast (Sections 2.1 and 2.2) were used to define the scale, location and timing of individual projects needed to implement the 2040 Growth Concept during the 20-year plan period of the 2000 RTP. Among the projects aimed at maintaining a robust economy are a number of highway corridor improvements, freight and passenger terminal access improvements, bridge improvements, rail crossing upgrades and channel deepening of the Columbia River (Appendix 1.1).

**134(f)(1)(B) Plan Increases Safety**

> *"Increase the safety and security of the transportation system for motorized and non-motorized users."*

The policy component of the 2000 RTP calls for a three-pronged implementation strategy that focuses on system preservation, 2040 implementation and safety projects as the most pressing needs for improving the regional transportation system (Section 1.3.7). The safety policy resulted in a number of safety improvements in the recommended projects and programs in the plan (Appendix 1.1). This emphasis on safety is also mirrored in Metro's MTIP funding process, where safety improvements are given a priority.

**134(f)(1)(C) Plan Increases Accessibility and Mobility**

> *"Increase the accessibility and mobility options available to people and for freight."*

The transportation vision that guides the RTP (Section 1.1) is based on the premise that the system must become more multi-modal in design and function in order to fully implement the 2040 Growth Concept, and reduce dependency on the automobile as a sole mode of travel. The vision is translated into motor vehicle, transit, freight, bicycle and pedestrian policies that emphasis mobility and access to 2040 centers (Section 1.3.5).

The systems analysis for the 2000 RTP shows that implementing the recommended projects and programs in the plan would result in significant increases in non-auto travel, and enhanced accessibility and mobility by all modes (Appendix 1.2).

**134(f)(1)(D) Plan Protects Environment**

> *"Protect and enhance the environment, promote energy conservation, and improve quality of life."*

The policy component of the 2000 RTP seeks to protect sensitive environmental areas and resources from the potentially negative effects of transportation improvements (Section 1.3.4). The transit, bicycle and pedestrian systems envisioned in the plan (Section 1.3.5) and corresponding projects that implement these systems, promote energy conservation and enhance air quality by reducing the use of motor vehicles. The region's parking policies (Title 2 of the Urban Growth Management Functional Plan) are also designed to encourage the use of alternative modes, and reduce reliance on the automobile, thus promoting energy conservation and reducing air quality impacts.

**134(f)(1)(E) Plan is Multi-modal**

> *"Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight."*

The regional street design classifications (Section 1.3.5) are a new strategy to link transportation and 2040 land use considerations for all portions of the regional transportation system. The design classifications establish a modal-orientation on detailed segments of the major street system, reflecting future travel demand that is expected for individual 2040 land use components. In compact, mixed-use areas, the street design classifications emphasis transit, bicycle and pedestrian elements, as well as calmed motor vehicle travel speeds and on-street parking that supports storefront development. In industrial and employment areas, the street design classifications emphasis motor vehicle travel, including freight, with an emphasis on motor-vehicle mobility.

However, all of these classifications are multi-modal in design, and embrace the principle that all streets should serve all modes of travel in some manner. The exception to this strategy are limited-access freeway and highway facilities, that are not intended to included pedestrian and bicycle access, due to safety concerns.

**134(f)(1)(F) Plan Promotes System Management**

> *"Promote efficient system management and operation."*

The policy component of the 2000 RTP includes specific provisions for efficient system management and operation (Section 1.3.6), with an emphasis on TSM, ATMS and the use of non-auto modal targets intended to discourage overbuilding of roadway

improvements. These provisions are implemented through a number of projects and programs recommended in the plan (Appendix 1.1). The regional congestion management system also requires local jurisdictions to explore system management solutions before adding roadway capacity to the regional system (6.6.3).

**134(f)(1)(G) Plan Emphasizes System Preservation**

*"Emphasize the preservation of the existing transportation system."*

The implementation policies of the 2000 RTP call for a three-pronged approach that focuses on system preservation, 2040 implementation and safety projects as the most pressing needs for improving the regional transportation system (Section 1.3.7). The system preservation policy resulted in a number of major reconstruction and preservation improvements in the recommended projects and programs in the plan (Appendix 1.1). The financial analysis in the plan (Section 4.2) also assumes that system preservation will take precedence over capital expansion projects. The 2000 RTP emphasis on system preservation is also mirrored in Metro's MTIP funding process, where reconstruction and preservation improvements are given a priority.

**134(g)(1) Long Range Plan Required**

"Each metropolitan planning organization shall prepare, and update periodically, according to a schedule that the Secretary determines to be appropriate, a long-range transportation plan for its metropolitan area in accordance with the requirements of this subsection."

The 2000 RTP serves as the long-range transportation plan for the purposes of this section, and replaces the 1995 Interim Federal RTP for that purpose.

**134(g)(2) Long Range Plan Required**

*"A long-range transportation plan under this section shall be in a form that the Secretary determines to be appropriate and shall contain, at a minimum, (A) through (D), below."*

**134(g)(2)(A) Identify Integrated System**

*"An identification of transportation facilities (including but not necessarily limited to major roadways, transit, and multi-modal and intermodal facilities) that should function as an integrated metropolitan transportation system, giving emphasis to those facilities that serve important national and regional transportation functions. In formulating the long-range transportation plan, the metropolitan planning organization shall consider factors described in subsection (f) as such factors relate to a 20-year forecast period"*

The 2000 RTP establishes integrated modal systems for motor vehicles, transit, freight, bicycles and pedestrians through a series of functional classification maps and accompanying narrative (Section 1.3.5). The street design classifications (Section 1.3.5) serve as the policy tool for integrating these modal systems, and linking them to the 2040 land use components. These modal systems and design classifications emphasize regional travel, as they apply only to the regional transportation system, which includes regional, statewide and interstate travel routes.

The previously established findings of compliance with the seven planning factors in subsection (f) were based on a 20-year planning period, and were considered during the formulation of the 2000 RTP policies, projects and implementation measures.

**134(g)(2)(B) Develop a Financial Plan**

> *"A financial plan that demonstrates how the adopted long-range transportation plan can be implemented, indicates resources from public and private sources that are reasonably expected to be made available to carry out the plan, and recommends any additional financing strategies for needed projects and programs. The financial plan may include, for illustrative purposes, additional projects that would be included in the adopted long-range transportation plan if reasonable additional re-sources beyond those identified in the financial plan were available. For the purpose of developing the long-range transportation plan, the metropolitan planning organization and State shall cooperatively develop estimates of funds that will be available to support plan implementation."*

The financially constrained system described in the 2000 RTP (Section 5.1) was specifically developed to comply with TEA-21 planning requirements. The system was developed based on a forecast of expected revenues that was formulated in partnership with the Oregon Department of Transportation. The projects and programs recommended in the financially constrained system (Section 5.2) were developed cooperatively with local jurisdictions and through workshops sponsored by TPAC. The financially constrained system is intended as the "federal" system for purposes of demonstrating air quality conformity, and allocating federal funds through the MTIP process (Sections 6.1 and 6.5).

In addition to the financially constrained system, the 2000 RTP identifies illustrative projects and programs for the priority system, which is more than three times the scale and cost of the financially constrained system (Section 5.2). The priority system represents the region's objective for implementing the 2000 RTP, and includes a series of funding scenarios that could be used to realize this system over the 20-year plan period (Section 5.4). In contrast to the financially constrained system, the priority system meets

most of the 2000 RTP performance measures and policies. The priority system also serve as the "state" system for compliance with the Oregon Transportation Planning Rule.

**134(g)(2)(C) Plan for System Preservation**

> *"Assess capital investment and other measures necessary to —*
>
> *(i) ensure the preservation of the existing metropolitan transportation system, including requirements for operational improvements, resurfacing, restoration, and rehabilitation of existing and future major road-ways, as well as operations, maintenance, modernization, and rehabilitation of existing and future transit facilities; and*
>
> *(ii) make the most efficient use of existing transportation facilities to relieve vehicular congestion and maximize the mobility of people and goods."*

The 2000 RTP revenue forecast and financial analysis includes an estimate of operation and maintenance costs that was based on a thorough evaluation of city and county, ODOT and Tri-Met cost projections (Sections 4.1 through 4.3).

The system management policies in the 2000 RTP (Section 1.3.6) and resulting projects and programs (Appendix 1.1) are intended to maximize the use of existing facilities. The regional congestion management system also requires local jurisdictions to explore system management solutions before adding roadway capacity to the regional system (6.6.3).

**134(g)(2)(D) Transportation Enhancement Activities**

> *"Indicate as appropriate proposed transportation enhancement activities."*

Transportation enhancement activities have been conducted within the MTIP process. As a funding issue these activities are addressed in the MTIP, not in the 2000 RTP.

**134(g)(3) Clean Air Act Coordination**

> *"In metropolitan areas which are in non-attainment for ozone or carbon monoxide under the Clean Air Act, the metropolitan planning organization shall coordinate the development of a long-range transportation plan with the process for development of the transportation control measures of the State implementation plan required by the Clean Air Act."*

An air quality maintenance plan was established for the Portland metropolitan area on (EQC adoption date) July 12, 1996, based on attainment with Clean Air Act standards for ozone and CO emissions.

**134(g)(4) Plan Participation**

> *"Before approving a long-range transportation plan, each metropolitan planning organization shall provide citizens, affected public agencies, representatives of transportation agency employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transit, and other interested parties with a reasonable opportunity to comment on the long-range transportation plan, in a manner that the Secretary deems appropriate."*

The 2000 RTP was developed with an emphasis on public outreach. The policy development phase was led by a 21-member RTP Citizen Advisory Committee, and the system development phase was kicked off through a series of citizen workshops held throughout the region. Progress on the 2000 RTP was published in a series of newsletters that were mailed to more than 70,000 households in the Portland region in 1995, 1996, 1997 and 1998. In 1999, more than 30,000 detailed brochures describing proposed projects and programs were distributed to the public and officials across the region.

In 1999 and 2000, thousands of individual comments on the final draft of the plan were received, and documented in a two-volume RTP Public Comment Report. During this final phase of the plan development, a mailed notice to every public agency in the region, including schools, invited public agencies to review and comment on the plan, as well.

Most plan documents were simultaneously published on Metro web site, including draft plan provisions, brochures and other explanatory materials, and summaries of public comments received.

Public involvement opportunities and several key decision points were published in local newspapers, posted on Metro's web site, and advertised through Metro's transportation hotline, where citizens could leave comments as well as receive information on upcoming meetings.

**134(g)(5) Plan Publication**

> *"Each long-range transportation plan prepared by a metropolitan planning organization shall be:*
>
> *(i) published or otherwise made readily available for public review; and*

*(ii) submitted for information purposes to the Governor at such times and in such manner as the Secretary shall establish"*

The 2000 RTP has been published in draft form at several stages during the plan development process. The policy component was published in 1996, following approval by resolution by the Metro Council in July 1996. The RTP Alternative Analysis report was published in 1997, marking the development of draft level of service policies for the new plan. The CAC Idea Kit (a kickoff set of project and program ideas compiled by the RTP CAC) was published in early 1998.

In Fall 1998, and updated Transportation Solutions for 2020 document was published, outlining draft projects and programs in more detail. The Fall 1998 "Getting There" newsletter accompanied the transportation solutions document, and provided a 20-page synopsis of the new plan. The newsletter was mailed to more than 70,000 interested parties in the region.

In Fall 1999, seven subarea brochures, an updated "Getting There" brochure and preliminary draft of the new transportation plan were published and distributed at workshops and open housed throughout the region. In November 1999, the first formal public comment draft of the new regional transportation plan was published for public review. In February 2000, the resolution draft of the 2000 RTP was published, and distributed for a final round of review and public comment. The final 2000 RTP will be published in early 2001, incorporated several hundred changes from the final comment periods.

**134(g)(6) Selection of Projects**

*"Not-withstanding paragraph (2)(B), a State or metropolitan planning organization shall not be required to select any project from the illustrative list of additional projects included in the financial plan under paragraph (2)(B)."*

The implementation provisions of the RTP require the MTIP to select projects for federal funding exclusively from the federally-recognized financially constrained system (Section 6.5.1)

**134(i)(1)(A) Designation of Transportation Management Areas**

*"The Secretary shall designate as a transportation management area each urbanized area with a population of over 200,000 individuals."*

The Portland region exceeds this population threshold, and is designated as a Transportation Management Area.

**134(i)(2) Transportation Plans in Management Areas**

> *"Within a transportation management area, transportation plans and programs shall be based on a continuing and comprehensive transportation planning process carried out by the metropolitan planning organization in cooperation with the State and transit operators."*

Metro is the designated metropolitan planning organization for the Portland region, and prepares the regional transportation plan in cooperation with the Oregon departments of Transportation, Environmental Quality and Land Conservation and Development, Tri-Met and other transit operators in the region, the Port of Portland, three counties and 24 cities.

**134(i)(3) Congestion Management System**

> *"Within a transportation management area, the transportation planning process under this section shall include a congestion management system that provides for effective management of new and existing transportation facilities eligible for funding under this title and chapter 53 of title 49 through the use of travel demand reduction and operational management strategies. The Secretary shall establish an appropriate phase-in schedule for compliance with the requirements of this section."*

The 2000 RTP includes a congestion management system (Sections 6.4.7 and 6.6.3) that was developed in response the federal ISTEA, and certified as part of Title 6 of the Urban Growth Management Functional Plan in 1996.

**134(i)(4)(A) Selection of Projects**

> *"All federally funded projects carried out within the boundaries of a transportation management area under this title (excluding projects carried out on the National Highway System and projects carried out under the bridge program or the Interstate maintenance pro-gram) or under chapter 53 of title 49 shall be selected for implementation from the approved transportation improvement program by the metropolitan planning organization designated for the area in consultation with the State and any affected public transit operator."*

All federal funds allocated through Metro are granted through the MTIP, the approved transportation improvement program for the Portland area MPO, and recognized as such by the State and Tri-Met (Section 6.5). Projects and programs funded with federal revenue through the MTIP process must be identified as part of the financially constrained system in the 2000 RTP (Section 6.5.1).

**134(i)(4)(B) National Highway System Projects**

> *"Projects carried out within the boundaries of a transportation management area on the National Highway System and projects carried out within such boundaries under the bridge program or the Interstate maintenance program shall be selected for implementation from the approved transportation improvement program by the State in co-operation with the metropolitan planning organization designated for the area."*

The MTIP funding decisions are developed in coordination with the Oregon Department of Transportation. Projects funded in the MTIP are incorporated into the State Transportation Improvement Program, to ensure consistency between regional and state improvement programs.

**134(i)(5)(A) Certification Required**

> *"The Secretary shall:*
>
> *(i) ensure that the metropolitan planning process in each transportation management area is being carried out in accordance with applicable provisions of Federal law; and*
>
> *(ii) subject to subparagraph (B), certify, not less often than once every 3 years, that the requirements of this paragraph are met with respect to the transportation management area."*

Metro's planning process is certified annually based on the adoption of the Unified Work Program ("UWP"), through the federal self-certification process. The next scheduled certification is in early 2001 based on the 2001 UWP.

**134(i)(5)(B) Certification Requirements**

> *"The Secretary may make the certification under subparagraph (A) if:*
>
> *(i) the transportation planning process complies with the requirements of this section and other applicable requirements of Federal law; and*
>
> *(ii) there is a transportation improvement program for the area that has been approved by the metropolitan planning organization and the Governor."*

The 1996 UWP self-certification process confirmed that the 1995 RTP complied with the requirements of this section, an other applicable requirements of federal law, and that Metro's MTIP had been approved by JPACT, the Metro Council and the Oregon Transportation Commission (OTC), on behalf of the Governor.

rmb 8-3-00
C\Resolutions\2000\00-2968B.doc

# FINDINGS OF FACT AND CONCLUSIONS OF LAW

CONSISTENCY OF THE 2000 REGIONAL TRANSPORTATION PLAN WITH APPLICABLE STATEWIDE PLANNING GOALS AND TRANSPORTATION PLANNING RULE REQUIREMENTS FOR A REGIONAL TRANSPORTATION SYSTEM PLAN

## Overview

The 2000 Regional Transportation Plan ("RTP") is a legislative decision to adopt Metro's functional plan for transportation. LUBA has recently restated that local governments, including Metro, can adopt findings to demonstrate that a legislative decision applies with applicable standards and, also, rely on argument in its brief and citation to facts in the decision record. *Residents of Rosemont v. Metro,* LUBA No. 99-010 (June 16, 2000). Ordinance No. 00-869A contains the regional Transportation System Plan ("TSP"). This same adopting ordinance adds this functional plan to the all encompassing Regional Framework Plan. The policies in Chapter 1 of the 2000 RTP become the Regional Framework Plan transportation policies in Chapter 2 of that Plan. The entire RTP becomes an implementation appendix in the Regional Framework Plan, just as the Urban Growth Management Functional is part of that Plan.

The following Findings are intended to explain how the 2000 RTP complies with applicable standards in general. These Findings are a roadmap to the extensive decision record for this multi-year planning effort. There are several standards applicable to this legislative land use decision: statewide Goals, including Goal 2 government coordination responses and Transportation Planning Rule Findings for the regional TSP. The explanations in these Findings refer to record documents in some instances. These findings are intended to be supplemented by the facts in the decision record.

Ordinance No. 00-869A transmits the 2000 RTP to the Land Conservation and Development Commission ("LCDC") for consideration of initial acknowledgment of the transportation component of the Regional Framework Plan ("RFP"). The RFP Chapter 2 policies and the regional TSP portions of the 2000 RTP are the policies and implementation that make up the transportation component of the RFP.

## Findings of Compliance With Applicable Statewide Goals

### Goal 1. Citizen Involvement

In 1995, Metro adopted the Transportation Planning Public Involvement Policy which describes public participation and procedures which Metro is expected to follow in the development of regional transportation plans, programs and major projects. In addition, Metro had previously adopted section 1.3.1 Public Process, including Policy 1.0 Public Involvement and Policy 2.0 Intergovernmental Coordination by resolution in 1996 and in the 1997 Regional Framework Plan. These policies were applied to the development of the 1999 final draft and the adoption of this 2000 RTP and regional Transportation System Plan. A description of this

process, the mailing lists, public forums, TPAC, JPACT, Citizen Advisory Committee meetings consistent with the public involvement work plan were included in the decision record and are available from Gina Whitehill-Baziuk at 797-1746.

The 2000 RTP complies with statewide Goal 1 in the citizen involvement polices applied to its development and adoption and required in the Plan for its implementation.

**Goal 2. Land Use Planning**

The 2000 RTP is a consistent part of the land use planning process and policy framework established by Metro's adopted and acknowledged 1995 Regional Urban Goals and Objectives ("RUGGO"s) and 1997 Regional Framework Plan required by Metro Charter and ORS 268.390. As the Plan indicates, it is the regional transportation functional plan for ORS 268.390(2) and the regional Transportation System Plan required by OAR 660-012-0012. Within the 1997 Regional Framework Plan, the 2000 RTP is the regional transportation component to implement the acknowledged 2040 Growth Concept. Important federal funding for transportation facilities and programs are coordinated with state and regional transportation policies by the 2000 RTP acting as the federal Metropolitan Transportation Plan required under TEA-21. *See,* Resolution No. 00-2969.

The 2000 RTP complies with statewide Goal 2 because it becomes part of the state and federal planning processes and policy framework to implement the state-acknowledged 2040 Growth Concept and operate as the federal transportation plan for this (federal) Metropolitan Planning Organization.

Coordination with affected governments is required by statewide Goal 2. As indicated by the documentation of notice, comments and responses to government concerns in the decision record, Metro solicited, received and responded to government comments. The following are detailed statements of government concerns indicated during the final comment period prior to adoption of the 2000 RTP and Metro responses to them as required by the Court of Appeals in *Parklane v. Metro,* (2000).

The 2000 RTP complies with Goal 2 because it was coordinated with all affected governments.

**Government Coordination Findings**

The Court of Appeals in *D.S. Parklane et al v. Metro* (2000), has interpreted statewide land use Goal 2 to require findings that explain government requests and Metro's response. These are the final remaining requests after Metro has responded to early comments. The decision record contains more detailed responses and responses to requests made prior to the 2000 RTP Supplemental Revisions document.

**Clackamas County – June 29, 2000**

- Section 6.8.7, Jobs/Housing Imbalance. Clackamas County requests that Metro include in the RTP a commitment to staff and fund a work program to assist the County in the analysis of rural and EFU land along the Sunrise Corridor for potential use as urban land.

  *Response:* Comment noted. A commitment to staff and fund a work program to assist the County is more appropriate for discussion during the adoption process for the annual Unified Work Program.

- Proceed with South Corridor Transportation Alternative Study.

  *Response:* No change recommended. The study is currently underway.

**Washington County - June 29, 2000**

- Requests greater public outreach on the LOS policy, 2040 land use implications and RTP finance, and delay adoption of the RTP by six months to accomplish this.

  *Response:* Adoption of the RTP was postponed by JPACT until August 10, 2000 to consider a resolution to state that Metro will undertake additional analysis and consider solutions for an additional one year.

- Requests change of RTP level of service ("LOS") policy to not accept one hour of "F" policy and analysis of mid-day congestion.

  *Response:* The RTP contains no change in LOS policy from the policy that was analyzed and debated in 1996-97. The policy does not preclude a higher local LOS than the regional policy, with some conditions.

  A mid-day congestion analysis was completed as part of a series of post-resolution refinements to the plan in early 2000. The mid-day system performance is generally very good, and LOS policy is only an issue in a small number of localized areas.

- Requests add cost of $8 million to description of Project # 3069 (Scholls Ferry Road Improvements).

  *Response:* Amend as requested.

**City of Gresham – June 29, 2000**

- Requests add text to Section 1.3.5.

  *Response:* Amend as requested.

**City of Hillsboro – June 29, 2000**

- Requests revise Figure 5.16 (North Washington County Map) narrative of project #3136 to read, "[w]iden the street to three lanes from Baseline Road to ~~Airport~~ Cornell Road and..."

  *Response:* Amend as requested.

- Request revise Figure 5.16 (North Washington County Map) narrative of project #3134 to read, "[w]iden the street to ~~five~~ three lanes from Tualatin Valley Highway to Baseline Road."

  *Response:* Amend as requested.

- Request revise Figure 5.16 (North Washington County Map) to change road names indicating 219th Avenue and 216th Avenue and replace them with Cornelius Pass Road from Cornell Road to Tualatin Valley Highway.

  *Response:* Amend as requested.

- Request revise Figure 5.16 (North Washington County Map) to add label for Project #3126 adjacent to #3134 label to reflect that both projects are included in the Strategic System during different time periods.

  *Response:* Amend as requested.

- Request revise Figure 5.16 (North Washington County Map) to add Project #3126 during the 2006-2010 time period.

  *Response:* Amend as requested.

- Request revise Figure 5.16 (North Washington County Map) to revise time period for Project #3128 to be 2001-2020 to reflect Appendix 1.1.

  *Response:* Amend as requested.

- Request revise Figure 5.16 (North Washington County Map) to resolve time period conflict for project #3223. The project is listed in Appendix 1.1 for the 2011-2020 time period and in Figure 5.16 in the 2006-2010 time period.

  *Response:* Amend as requested.

- Request amend Section 6.4.1, Chapter 2, to read as follows, "2020 population and employment forecast...as provided for in Section ~~6.4.8~~ 6.4.9 of this chapter ... ."

  *Response:* Amend as requested.

- Request amend Section 6.4.7(1), first paragraph, to read as follows, "and that this level of congestion will negatively impact accessibility, as determined through Section 6.4.7(~~2~~)(b)."

  *Response:* Amend as requested.

- Request amend Section 6.4.7, first paragraph, to read as follows, "any locations on the Regional Motor Vehicle System Map (Figure ~~1.8~~ 1.12) that are not addressed by the RTP."

  *Response:* Amend as requested.

- Request amend Section 6.4.9, first paragraph, to read as follows, "[t]herefore, Metro will accept local plans under the following ~~three~~ four options."

  *Response:* Amend as requested.

- Request amend Section 6.4.9, subparagraph 4, on page 36 in Supplemental Revisions to 1999 Regional Transportation Plan to read, "[h]owever, population and employment data and forecasts and the methodology for generating the data and forecasts shall be coordinated … ."

  *Response:* Amend as requested.

- Request amend Section 6.4.9, subparagraph 4, on page 37 in Supplemental Revisions to 1999 Regional Transportation Plan to read, "[s]ubsequent differences in local TSP project recommendations that result from the differences in population and employment forecasts will be ~~resolved~~ incorporated in the next scheduled RTP update."

  *Response:* No change.

**City of Portland – June 21, 2000**

- Request the following changes should be made to the Regional Public Transportation System Map (p 1-39) and/or the Transit Service Strategy map (p 5-13) to be consistent with City of Portland policies and/or existing and planned Tri-Met service.

  - **N Graham between Interstate and Williams:** Delete as a Regional Bus. Service on this street would be duplicative of proposed service on N Russell.

  - **N/NE Columbia:** Show Regional Bus designation between 21st and 47th rather than 33rd to 47th to reflect existing service.

  - **SE 26th/SE 28th:** Change alignment to SE 26th between Division and Gladstone, SE Gladstone between SE 26th and 28th, and SE 28th between Gladstone and Woodstock to reflect existing and planned transit service.

- **SE 20th/SE 21st:** Show SE 20th between Sandy and Division and SE 21st between Division and Powell as Regional Bus to reflect Tri-Met's planned service.

- **NE 102nd:** Show 102nd between Glisan and Sandy as a Rapid Bus. Tri-Met will use this street segment between Gateway and Parkrose instead of I-205 to provide Rapid Bus service.

- **SE Holgate:** Extend Regional Bus designation on Holgate to 122nd to reflect existing service.

- **SE Harold:** Extend Regional Bus designation on Harold to 122nd to reflect existing service.

- **SE 111th:** Delete as Regional Bus. The service on Holgate and Harold use 136th as turn arounds for the # 17 and 10 routes, not 111th.

- **I-5:** Show transit designation on I-5, since bus service (and HOV lanes in north I-5) is currently running and is likely to continue. Portland classifies I-5 as a Regional Transitway.

- **SW Salmon:** Change SW Salmon from transit mall to SW 1st to Frequent Bus to match designation west of transit mall. Also, connection from SW Salmon at SW 1st to the Hawthorne Bridge as Frequent Bus.

- **SW Terwilliger:** Add Regional Bus designation to Terwilliger from Taylors Ferry to Barbur to reflect existing service. This segment is currently classified as a Major City Transit Street; the city is considering lowering the classification to a Transit Access Street but feel it should have service above Community Bus.

- **Transit stop locations:** Delete transit stop at SW College and 9th (approximate). This stop is not needed because the Central City Streetcar alignment has changed.

- **Central City Streetcar:** Revise Central City insert to reflect currently planned alignment using Mill between 6th and 10th Avenue, Market between 5th and 10th Avenue, 5th between Market and Montgomery and a NW-SE diagonal line between 6th/Mill intersection and 5th/Montgomery intersection.

- **Macadam Corridor Frequent Bus:** Distinguish on the map that Macadam Avenue extends between Downtown and Lake Oswego as Frequent Bus. This line is clear on the Central City insert map but seems to disappear on the regional map.

- **Macadam Corridor Commuter Rail:** The potential commuter rail line should indicate alternative alignments, one using the current Willamette Shore alignment, the other using the adopted rail corridor alignment in the Johns Landing Master Plan. Depending on the

vehicle type, one alignment may be more appropriate over the other. This could also be clarified in the RTP text in the Specific Corridor Refinements section of Chapter 6 (discussing Macadam/Highway 43).

*Response:* Amend Regional Public Transportation system Map (Figure 1.16) and Transit Service Strategy Map (Figure 5.4) as requested. In addition, add the following language to Chapter 6 as requested:

### 6.7.5 Specific Corridor Refinements

Macadam/Highway 43 phasing of future streetcar commuter service or commuter rail in this corridor to provide a high-capacity travel option during congested commute periods, using either the Willamette Shore Line right-of-way, the John's Landing Master Plan rail corridor or other right-of-way as appropriate.

**Port of Portland – June 21, 2000**

- Requests revise Figure 1.17 (Regional Freight System Map) to include the rail system in the Rivergate area.

*Response:* Amend as requested.

**City of Portland – June 14, 2000**

- Revise the connectivity requirements for street and accessway spacing in Chapter 6 to reflect the original intent of Title 6 connectivity requirements, which stipulated that accessway spacing requirements applied when a full street connection is not possible, and were not required in addition to full street connections that meet the connectivity requirement.

*Response:* Amendment as requested with language. The original intent of the accessway provisions was inadvertently modified during subsequent revisions to Title 6. JPACT recommended the following revisions to Chapter 6 requirements on page 33 in Supplemental Revisions to 1999 Regional Transportation Plan to address this comment:

**Section 6.4.5 – Design Standards for Street Connectivity**

2. In addition to preparing the above conceptual street plan map, Cities and Counties shall require new residential or mixed-use development that will require construction of new street(s) to provide a street map that:

   a. Responds to and expands on the conceptual street plan map as described in Section 6.4/5/1 for areas where a map has been completed

   b. Provides full street connections with spacing of no more than 530 feet between connections, except where prevented by barriers such as topography, railroads,

freeways, pre-existing development or water features where regulations implementing Title 3 of the Urban Growth management Functional Plan do not allow construction of or prescribe different standards for street facilities.

c. Provide bike and pedestrian ~~connections~~ accessways on public easements or rights-of-way in lieu of streets when full street connections are not possible. Spacing of accessways between full street connections shall be no more than 330 feet, except where prevented by barriers such as topography, railroads, freeways, pre-existing development, or water features where regulations implementing Title 3 of the Urban Growth management Functional Plan do not allow construction of or prescribe different standards for street facilities.

- The narrow street provisions in Chapter 6 should be expanded to allow other local street design alternatives, such as woonerfs or urban lanes, that offer similar traffic calming benefits, and use a narrow right-of-way.

  *Response:* Amend as requested with language.

- The narrow street provisions in Chapter 6 should be clarified to acknowledge the appropriate use of additional right-of-way for swales or other on-site stormwater systems.

  *Response:* No change recommended. It is premature to incorporate provisions on "green" designs until the upcoming Green Streets project has been completed. This project will recommend specific design solutions for on-site stormwater treatment, and recommendations from the Green Streets study will include updates to the street connectivity provisions in the RTP.

**City of Tigard – June 14, 2000**

- Revise the descriptions of the Highway 99E Area of Special Concern in Chapter 6 on page 40 in Supplemental Revisions to 1999 Regional Transportation Plan.

  *Response:* Amend as requested.

**Washington County – June 12, 2000**

- Requests RTP language to address how to resolve conflicts between RTP Figure 1.4 and specific planning activities locating boulevards in local land use and transportation plans for regional and town center areas.

  *Response:* No change. Section 6.4.8 in Chapter 6 of the RTP allows for findings of consistency with the RTP and the revision will be proposed for future RTP updates based on such findings.

- Requests addition of ten "Collectors of regional significance" to Figure 1.12 and clarification of this designation.

  *Response:* It is inappropriate for Germantown Road to be designated as a regional facility because of physical constraints throughout the corridor. Cornelius Pass Road is designated as an arterial and is intended to serve regional trips connecting northern Washington County to Highway 30. Designating 143rd Avenue as a Collector of Regional Significance would not serve a different travel function than Bethany Boulevard and Saltzman Road, which are designated as collectors of regional significance. Amend as requested as a dotted line from Baseline Road to Rock Road and as a solid line from Rock Road to Farmington Road. In addition, designate 198th Avenue between Baseline Road and Farmington Road as a community street in Figure 1.4. Designating Barrows Road as a Collector of Regional Significance would not serve a different travel function than Scholls Ferry Road, which is designated as a major arterial in this part of the region.

- Designate Kinnamon Road between 209th Avenue and Farmington Road as a Collector of Regional Significance on the Regional Motor Vehicle System Map.

  *Response:* In addition, designate Kinnamon Road between 209th Avenue and Farmington Road as a community street in Figure 1.4.

- Designate Springville Road between 185th and Portland Community College as a Collector of Regional Significance on the Regional Motor Vehicle System Map.

  *Response:* Could be considered for amendment to the RTP if identified as part of a complete collector level system and designated in the Washington County transportation system plan. Designating Vermont Street as a Collector of Regional Significance would not serve a different travel function than Beaverton-Hillsdale Highway and Garden Home Road, which are designated as major and minor arterials respectively. Downgrade Oak Street from a minor arterial to a collector of regional significance from Murray Boulevard to Farmington Road.

- Requests deletion of the regional bus on Walker east of Cedar Hills Blvd. on Figure 1.16, Regional Public Transportation System.

  *Response:* Amend as requested. In addition, designate Park Way from Walker Road to Sunset transit center as regional bus. The regional bus service designation on Walker Road east of Cedar Hills Boulevard was made in error. The regional bus service designation should have continued north from Walker Road along Park Way to connect to Sunset transit center.

- Requests deletion of the segment of Walker east of Cedar Hills Blvd. on Figure 1.18, Regional Pedestrian System.

*Response:* Amend as requested. In addition, designate Park Way from Walker Road to Sunset transit center as transit/mixed-use corridor. The transit/mixed-use corridor designation on Walker Road east of Cedar Hills Boulevard was made in error, reflecting an error on the Regional Public Transportation System Map. The transit/mixed-use corridor designation should have continued north from Walker Road along Park Way to connect to Sunset transit center to support regional bus service along this corridor.

- Requests changing Figure 3.2 legend "bicycle lanes and paths" to "bikeways," including MST1P3 bikeway improvements not shown.

  *Response:* Amend as requested. Metro staff will coordinate with Washington County staff to ensure that funded bikeway improvements in Washington County, including MSTIP3, are described in Figure 3.2.

- Requests add Westside not "Western" Transportation Alliance and Tualatin TMA to Figure 3.4, Existing and Proposed Transportation Management Associations.

  *Response:* Amend as requested.

- Requests clarification of page 19 in Supplemental Revisions to 1999 Regional Transportation Plan.

  *Response:* Amendment recommended. Revise the second paragraph under Section 2.3 on page 19 in Supplemental Revisions to 1999 Regional Transportation Plan to read, "[t]hese subareas were used for governmental coordination purposes to illustrate facilities which serve related city, county and district areas as part of the functional plan role of this RTP. The location and boundaries of these subareas are for analysis purposes only, and roughly ~~was based on the~~correspond to county boundaries.~~2040 design types of central city, regional center and industrial areas. As an aid to 2040 Growth Concept implementation, these subareas are related to the functional plan role of this RTP, not the regional TSP."~~

  In addition, revise the first paragraph under Section 2.4 on page 19 in Supplemental Revisions to 1999 Regional Transportation Plan to read, "[t]he TPR requires that the regional TSP reduce reliance on the automobile as measured by vehicle miles traveled per capita. Providing opportunities for people to make ~~F~~fewer ~~trips~~ and shorter trips can reduce vehicle miles traveled per capita. As one part of the 2040 Growth Concept policy to balance jobs and housing, this subregional analysis serves as the basis for findings in Chapter 3 and Chapter 5, which establish the impact of expected growth in population, households and employment on regional transportation corridors that serve key 2040 design types. ~~combines regional center areas for a general analysis of the large regional center areas for a general analysis of the large major regional transportation corridors.~~ These corridors have the greatest traffic volumes and the longest trips among the highest concentrations of jobs and housing in the region. This subregional analysis serves as the basis for understanding trip

patterns based on the location of jobs and housing throughout the region and is ~~a~~ one tool for identifying ~~ways~~ opportunities to reduce the number and length of trips in these high volume corridors based on those trip patterns."

Revise first paragraph in Section 2.5 on page 19 in Supplemental Revisions to 1999 Regional Transportation Plan to read, "[i]f no new transportation projects or programs are constructed, the estimated population and employment growth will impact the existing regional transportation system. This No-Build System shows where additional regional transportation system needs are created by that growth. The regional TSP, then, adequately addresses those needs in the Priority System in Chapter 5.

- Requests change of page 28, third bullet to omit reference to "local needs" being met by the priority regional system.

  *Response:* Amendment recommended. Revise the second sentence in the third bullet to read, "[f]or the purpose of complying with this requirement, the Priority System in Chapter 5 of the RTP establishes a ~~transportation needs relevant to the Metro area. The~~ scale of the improvements ~~in the Priority System~~ that are adequate ~~for~~ to meet state, and regional ~~and local~~ travel needs in the Metro area, including "[t]he reference to the Preferred System is not appropriate in this section because the Priority System is the system used to comply with the Transportation Planning Rule requirements.

- Requests substitution of "Preferred System" (Chapter 3) for the "Priority System" (Chapter 5) as the system of adequate facilities for the regional Transportation System Plan on Page 28.

  *Response:* No change recommended.

- Requests clarification of congestion of "regional significance" on page 35, first paragraph and the relationship to local TSPs.

  *Response:* No change recommended. Section 6.4.8 and 6.6.2 in Chapter 6 of the RTP clarify the process for amending the RTP based on more detailed evaluation of the local transportation system as part of refinement plans and local transportation system plan development.

- Requests clarification of "reverse commute" on page 42 at 6.8.12.

  *Response:* Amend as requested.

- Requests correction of cost estimate for Project #3002 in Appendix to $21M.

  *Response:* No change recommended. Current cost is correct.

- Requests inclusion of Project #3006 on "Financially Constrained" list in Appendix.

*Response:* No change recommended. This project was not included in ODOT's list of projects for the financially constrained system.

- Requests add description of Project #3008 at $24M for 2000-2005 to Appendix.

  *Response:* No change recommended. This project was removed from the RTP project list because the project is committed in the STIP.

- Requests add "Murray to 185th to Project #3009 description in Appendix.

  *Response:* Amend as requested.

- Requests correct Project #3009 estimated cost to $8M in Appendix.

  *Response:* Add description of location for Project # 3009 (Murray Boulevard to 185th Avenue). Amend as requested.

- Requests add Project #3175 to Priority and Financially Constrained Systems in Appendix.

  *Response:* Amend as requested.

- Requests correct Project #3182 location and cost to $6M in Appendix.

  *Response:* Amend as requested.

- Requests add Project #6000 to Preferred System in Appendix.

  *Response:* No change. Project #6001 represents the preferred level of commuter rail service – peak-hour and mid-day service.

- Requests add Tualatin-Sherwood connector Major Investment Study ("MIS") to Preferred and Priority Systems at $2M in 2000-2005 in Appendix.

  *Response:* Amend as requested.

- Requests add 170th Blanton to Farmington widen to 5 lanes with bikeways and sidewalks to Preferred System at $8M in 2011-20.

  *Response:* Amend as requested.

- Requests remove designation of 143rd Avenue extension south of Cornell Road from the Regional Motor Vehicle System Map because this project is no longer included in the RTP.

*Response:* Amend as requested. In addition, remove community street designation of 143rd Avenue south of Cornell Road from the Regional Street Design Map (Figure 1.4).

- Designate Laidlaw Road between 170th Avenue and the Bethany town center as a Collector of Regional Significance on the Regional Motor Vehicle System Map.

  *Response:* No change. This designation could be considered for amendment to the RTP if identified as part of a complete collector level system and designated in the Washington County transportation system plan.

**City of Happy Valley – June 8, 2000**

- Requests RTP change to reflect Happy Valley TSP "Collector Study Area" between SE Clatsop and SE 132nd Avenue intersection to SE Mt. Scott Blvd.

  *Response:* Amend regional transportation system maps in Chapter 1 as follows:

  - Regional Street Design System: Add a dashed line between the intersection of SE Clatsop and SE 132nd to SE Mt. Scott Boulevard to designate a proposed Community Street.

  - Regional Motor Vehicle System: Add a dashed line between the intersection of SE Clatsop and SE 132nd to SE Mt. Scott Boulevard to designate a proposed Collector of Regional Significance.

  - Regional Bicycle System: Add a dashed line between the intersection of SE Clatsop and SE 132nd to SE Mt. Scott Boulevard to designate a proposed Community Connector Bikeway.

In addition, add King Road from 132nd Avenue to 145th Avenue to the Regional Bicycle System Map as a proposed Community Connector Bikeway for consistency with the Happy Valley TSP adopted in December, 1998.

**City of Tualatin – June 8, 2000**

- Requests Tualatin town centers be designated as an area of Special Concern.

  *Response:* Amend as requested with the recognition that the Tualatin transportation system plan will further evaluate motor vehicle congestion within the town center consistent with Section 6.7.7 in Chapter 6 of the Regional Transportation Plan.

- Requests schedule $5 million for major investment study and environmental design work in the 2000-05 time period for project #6005 (Tualatin—Sherwood Connector).

  *Response:* Amend as requested.

- Requests add Project # 6074 (65th/Tualatin River Crossing and connections) to the strategic system in the 2011-20 time period.

  *Response:* Amend as requested.

**City of Troutdale – May 24, 2000**

- Requests that "Marine Drive Extension" (new ID #2076), which would extend Marine Drive southward from the southern Frontage Road to Halsey Street be removed from the RTP due to impacts on residential areas south of Halsey Street and potential increased traffic on 257th Avenue.

  *Response:* Amend as requested.

**City of Lake Oswego – May 20, 2000**

- Requests that the RTP should allow as an exception to street connectivity requirements where streets or accessways would violate provisions of leases, easements, covenants, restrictions or other agreements existing as of May 1, 1995 which preclude required street or accessway connection per the state Transportation Planning Rule.

  *Response:* Amend as requested.

**City of Beaverton – May 10, 2000**

- Edits suggested in paragraphs 1, 3, 5, 6, 7 made.

- Requests that Section 6.4.7 on page 21 to allow local jurisdictions to adopt alternative standards that do not "allow less vehicle delay."

  *Response:* Amendment as follows: "Jurisdictions may adopt ~~other minimum~~ alternative standards that do not exceed minimum LOS established in Table 1.2~~, but the use of higher~~ However, the alternative standards must not: ..."

- Requests that amendments to Section 6.4.10 on page 24 be deleted because standards are established that would be inflexible and difficult to interpret.

  *Response:* No change. The proposed language is included for the purpose of RTP consistency with OAR 660-12-0045(4).

- Requests revise Glossary definition of speed on page 45.

  *Response:* Amend as requested with proposed language.

**City of Oregon City – May 1, 2000**

- Requests that a regional bus route be added to the Regional Public Transportation System Map, location on Main and Washington Streets between downtown transit center and Highway 213 for a transit connection to the proposed Amtrak passenger station and future transit-dependent land uses.

  *Response:* No change. While a major transit stop is designated at the future Amtrak station and regional bus service is appropriate to link the station to the Oregon City regional center, it is not readily apparent how regional bus service could be routed to best serve this purpose.

- Requests two additional major bus stops for Hilltop areas and the proposed Amtrak rail station.

  *Response:* As requested, add a major bus stop designation to Figure 1.19 on Molalla Avenue in the vicinity of Warner Milne Road or Beavercreek Road and at the Amtrak rail station to connect the inter-city passenger service with the regional bus service.

- Requests two additional trail projects (I-205 to Clackamette Park and Clackamette Park to Smurfit) on the RTP Project List to link I-205 trail North/South Transit Corridor and downtown Oregon City consistent with the Greenspaces Master Plan.

  *Response:* Amend as requested by add to Priority System in Chapter 5 and Appendix 1.1.

**Goal 3. Preserve Agricultural Lands**

All of the urban transportation facilities in the 2000 RTP are located inside the original urban growth boundary ("UGB") except for portions the Sunrise Corridor in Clackamas County and the I-5 to 99W connector in Washington County. *See,* OAR 660-012-0070 and Attachments 1 and 2 to this Exhibit "B", below for systems level exceptions taken for those portions of the two corridors for planned facilities planned to be located outside the UGB.

The 2000 RTP complies with Goal 3 because all urban transportation facilities in the plan are within the UGB, other than portions of two planned facilities for which systems level exceptions have been taken.

**Goal 4. Conserve Forest Lands**

All of the urban transportation facilities in the 2000 RTP are located inside the original urban growth boundary ("UGB") except for portions of the Sunrise Corridor in Clackamas County and the I-5 to 99W connector in Washington County. ~~Attached are exceptions taken for those portions of the two corridors for planned facilities planned to be located outside the UGB.~~

~~The 2000 RTP complies with Goal 3 because all urban transportation facilities in the plan are within the UGB, other than portions of two planned facilities for which exceptions have been taken.~~

**Goal 5. Conserve Open Space, Protect Natural Resources Goal 6. Protect Air, Water and Land Resources Quality**

These resource goals will apply to project development decisions in local TSP for site specific projects. The 2000 RTP is designed to implement the 2040 Growth Concept and applicable regional goals and objectives which apply these statewide goals. Sections 1.2.4 and 1.3.4 of the 2000 RTP contain policies which protect any water land quality and natural resources.

**Goal 7. Areas Subject To Natural Disasters And Hazards**

The 2000 RTP is not intended to directly affect these areas. The RTP is a systems level plan which contains the regional Transportation Systems Plan ("TSP"), 2000 RTP capital improvements are expressly contingent upon local action to include proposed improvements in the affected local comprehensive plan supported by findings of compliance with applicable statewide goals during the project implementation of this transportation system plan. *See,* 6.7.1 through 6.7.4. If it is determined that the 2000 RTP system element or proposed improvement cannot comply with any affected goal, including Goal 5, 6, 7 at the time a final land use decision is taken the 2000 RTP will be amended as needed consistent with Section 6.6.2.

In addition, federal law requires an assessment of the potential environmental impacts of many of the transportation system improvements identified in the 2000 RTP. In cases where significant environmental impacts are possible, detailed analyses are required to determine and quantify potential adverse effects and develop actions to mitigate unavoidable impacts and protect these resources.

**Goal 8. Satisfy Recreational Needs**

The 2000 RTP furthers Goal 8 by identifying transportation system improvements that will enhance the level of mobility and improve access to recreational sites for citizens and visitors. The bicycle and pedestrian policies in Section 1.3.5, as well as the bicycle, pedestrian and multi-use path improvements identified in Appendix 1.1 will accomplish this.

The 2000 RTP complies with statewide Goal 8 because planned improvements will improve access of citizens and visitors to recreational sites.

Figure 1.18 demonstrates the planned bike connections that provide recreation and access to recreational destinations throughout the region.

Figure 1.19 demonstrates the planned pedestrian connections that provide recreation and access to recreational destinations throughout the region.

**Goal 9. Economic Development**

There are a number of RTP policies that contribute to a stable and healthy economy by seeking to assure availability of key transportation facilities:

Section 1.2.1 identifies industrial areas and intermodal facilities as primary components of Metro's 2040 Growth Concept. These areas are identified in Figure 1.0. A network of major street connections to the regional highway system and intermodal facilities serve industrial areas.

Policy 20.1 establishes 2040 Growth Concept implementation policy that the highest priority for the regional transportation system includes complementary transportation projects and programs that best serve the transportation needs of intermodal facilities and industrial areas, as well as the central city and regional centers.

Figure 1.12 demonstrates the planned arterial connections of industrial areas and intermodal facilities to state highways.

Figure 1.16 demonstrates planned public transportation connections to all regional centers and the central city.

Figure 1.17 demonstrates the planned freight and intermodal facilities connections to state rail, highway, air, and shipping facilities.

**Goal 10. Housing**

There are a number of TSP policies that contribute to providing for the housing needs of citizens in the region. Title 1 of the Urban Growth Management Functional Plan contains selective increased densities coordinated with public transportation and required minimum densities and no prohibition of accessory dwelling units to assure multi-family and affordable housing options.

Section 1.3.3, Policy 5.0 establishes the policy of providing transportation facilities which provide access to housing throughout the regional for all people.

**Goal 11. Public Facilities**

The 2000 RTP contains the regional TSP that includes public facility plan identification of anticipated projects and rough cost estimates in Appendix 1.1.

**Goal 12 Transportation: Findings of Compliance with Transportation Planning Rule ("TPR")**

The following are findings intended to explain how the regional Transportation System Plan ("TSP") which is contained in the 2000 RTP, plus Title 2 of the Urban Growth

Management Functional Plan, complies with the provisions of the TPR which are applicable to regional TSPs. These findings are a roadmap to the extensive decision record, except where findings are explicitly required by the Rule. Subsections of the TPR not addressed either define issues contained in findings for other subsections or apply to local TSPs, not regional TSPs.

**OAR 660-012-0010**

(1) Transportation planning under the TPR is divided into transportation system planning and project development. Metro's regional transportation system plan ("TSP") implements the general land use controls established in the acknowledged 2040 Growth Concept, acknowledged regional UGB and the Urban Growth Management Functional Plan by establishing a regional network of facilities and services to meet overall regional transportation needs. Cities and counties are generally responsible for transportation project development to implement the regional TSP by determining the precise location, alignment, and preliminary design of improvements included in the regional TSP.

(2) To avoid duplication of existing applicable transportation plans and programs, Metro's update to the 1995 Interim Federal Regional Transportation Plan required for federal funding of transportation facilities and services, has been integrated with the regional TSP in this 2000 Regional Transportation Plan ("2000 RTP"). Only the referenced portions of the 2000 Regional Transportation Plan shall be considered to be the regional TSP subject to the TPR.

The portions of Metro's 2000 Regional Transportation Plan which comprise the regional TSP are indicated in Section 6.2.1 of the RTP (Supplemental Revisions for Chapter 6). The regional TSP, also, includes Titles 1 and 2 of the Urban Growth Management Functional Plan.

**OAR 660-012-0015(2)**

As the federal Metropolitan Planning Organization ("MPO") for its region, Metro is required by the TPR to prepare a regional system of transportation facilities of regional significance adequate to meet identified regional transportation needs in compliance with applicable provisions of the TPR.

(2)(a) Chapter 3 of the 2000 RTP describes the identified regional transportation needs based on the expected land use and travel patterns for the year 2020 based on implementation of the LCDC acknowledged 2040 Growth Concept and predicted growth in population and employment. Metro's 2020 Regional Forecast in the decision record is summarized in Section 2.1. The 2020 land use assumptions used in this Forecast are based on the 2040 Growth Concept, estimating a modest expansion of the regional UGB over the 20 year planning period as summarized in Sections 2.1 and 2.3.

Chapter 5 identifies the 2020 Priority System[1] of planned regional transportation facilities and services adequate to meet identified regional transportation needs to 2020. This system

[1] The 2020 "Strategic" System in several documents in the decision record is the Priority System.

contains the regional TSP projects, not the "Preferred System" in Chapter 3 or the "financially constrained system" also in Chapter 5 that is identified for federal funding purposes.

Chapter 6, at section 6.4, identifies the land use and transportation policy and implementation requirements that must be reflected in city and county comprehensive plans, including local TSPs required by OAR 660-012-0015(3), for consistency with this regional TSP as required by OAR 660-012-0015(3)(a).

The decision record indicates regional TSP is consistent with adopted elements of the state TSP, the 1992 Oregon Transportation Plan and the 1999 Oregon Highway Plan.

(5) The decision record indicates that the regional TSP has been coordinated with affected state and federal agencies, local governments, special districts and private providers of transportation services.

- The Federal Highway Administration in its May 23, 2000, letter has indicated their involvement in the development of the 2000 RTP. Its use for federal transportation planning purposes will be proposed during the next federal certification process, tentatively scheduled for 2001.

- The Oregon Department of Transportation is a JPACT member and has indicated their support for the 2000 RTP as part of the JPACT review process, and recommended adoption of the 2000 RTP.

- Statewide Goal 2, Government Coordination Findings, above, state the local government and special district concerns remaining at the end of the long development and review of the 2000 RTP and Metro's responses.

(5) The decision record indicates that Tri-Met, the mass transit district, the Portland, Hillsboro and Troutdale Airports and the Port of Portland have participated in development of regional TSP provisions for those transportation facilities and services they provide. Some examples include:

- Tri-Met assisted Metro in developing the Regional Transit Service Strategy in Figure 5.4, Regional Public Transportation System Map in Figure 1.16, Figure 1.15, identifying the relationship between Metro's 2040 Growth Concept, and the regional public transportation system policy. Tri-Met's Primary Transit Network ("PTN") was incorporated as part of the 2000 RTP transit functional classification system in Figure 1.16.

- The Port of Portland assisted Metro in developing Regional Freight System Policy 15.0 and the Regional Freight System Map in Figure 1.17. The Port of Portland also worked to reflect Portland International Airport, Troutdale Airport and Hillsboro Airport needs in Appendix 1.1.

**Section 660.012.0015(2)(a) - Consistency with the 2000 Regional Transportation Plan with the 1999 Oregon Highway Plan, the State Transportation System Plan**

The following are findings of consistency of the 2000 Regional Transportation Plan with applicable sections of the 1999 Oregon Highway Plan, as required in OAR 660.012.0015(a), and summarized in ODOT publication 1999 Oregon Highway Plan Policies Requiring Consistency in Transportation System Plans. Each OHP policy is summarized:

**Policy 1A – State Highway Classification**

Use state highway classification system to guide investment and management: Interstate, Statewide, Regional, District and Local Interest Roads. Develop Expressways as a subset of classification system.

The Motor Vehicle System functional classification system in Section 1.3.5 of the 2000 Regional Transportation correlates to the OHP classifications, as follows:

| **2000 RTP Motor Vehicle Classification** | **1999 Oregon Highway Plan Classification** |
|---|---|
| Principal Arterial (Freeway) | Interstate Highway |
| Principal Arterial (Highway) | Statewide Highway |
| Major Arterial | District Highway |
| Minor Arterial | District Highway |
| Rural Arterial | District Highway |
| Collector of Regional Significance | (no corresponding OHP designation) |

Figure 1.12 in the 2000 RTP generally correlates to state highway classification maps in the 1999 Oregon Highway Plan, with the 2000 RTP designations for state facilities corresponding to the designations shown in the highway plan.

**Policy 1B – Land Use and Transportation**

Maintain the mobility and safety of the highway system. Foster compact development patterns in the communities. Encourage the availability and use of transportation alternatives. Enhance livability and economic competitiveness. Support acknowledged regional, city and county transportation system plans that are consistent with the Highway Plan.

The acknowledged 2040 Growth Concept provides the land use context for the 2000 RTP, and is shown in Figure 1.0. The Growth Concept establishes compact development as a guiding principle. The Growth Concept also embraces a multi-modal solution to transportation, and links land use designations to specific transportation strategies. The 2000 RTP is the first transportation plan to implement these regional policies. A discussion of how the plan implements the Growth Concept is shown in Section 1.2 of the 2000 RTP. This policy section describes the modal orientation of specific 2040 land use components, and the range of transportation alternatives that will be provided in these areas. The project list contained in

Appendix 1.1 was developed consistent with these policies, as required in Section 6.7.1 and 6.7.3 of the 2000 RTP.

The 2000 RTP is also consistent with special land use designations called out in the OHP for certain highway segments, including Special Transportation Areas, Commercial Centers and Urban Business Areas. While the 2000 RTP uses the street design classifications described in Section 1.3.5 and designated on Figure 1.4, the RTP classifications are generally correlated to OHP classifications in Section 6.2.3. However, this correlation is included in the RTP primarily for explanatory and consistency purposes to guide local TSPs, since the OHP land use designations are established between ODOT and local jurisdictions on a case-by-case basis. The 2000 RTP provides for Metro consideration of RTP amendments to reflect these case-by-case land use designations as they are made to maintain consistency with the OHP, as set forth in Sections 6.2.3 and 6.6.1.

The street design classifications in Section 1.3.5 are also the access management mechanism in the RTP. The classifications provide an access policy statement for all regional facilities, as shown on Figure 1.4 and described in Section 1.3.5. Local TSPs will establish more specific access controls to implement the regional policies contained in the 2000 RTP. Regional and local TSPs must apply state access management rules for state facilities. Access management issues are also called out for specific corridors described in Section 6.7.5 and 6.7.6, where further planning in several regional corridors is called for in the 2000 RTP.

The 2000 RTP also establishes regional policies for the provision of an adequate network of local streets. While local streets are generally beyond the scope of the *2000 RTP*, the cumulative effect of poor local street connectivity, for example, can have a pronounced impact on regional facilities that are forced to carry both local and regional trips. These policies are included in Section 1.3.5 of the 2000 RTP. They are implemented through the requirements in Section 6.4.5 of the plan. These provisions replace previous local street connectivity requirements formerly contained in Title 6 of the 1996 Urban Growth Management Functional Plan.

**Policy 1C –State Highway Freight Systems**

Balance the need for movement of goods with other uses of the highway system. Recognize the importance of maintaining efficient through-movement on major truck routes.

The regional freight system is described in Section 1.3.5 of the 2000 RTP, and Regional Freight System functional classifications are mapped in Figure 1.17. The freight classifications are closely correlated to the Motor Vehicle System classifications shown in Figure 1.12 of the 2000 RTP. The land use principles for industrial areas and intermodal facilities included in Section 1.2 provide the policy basis for the development of the Regional Freight System, and guided the development of freight-oriented projects shown in Appendix 1.1.

**Policy 1D –Scenic Byways**

Preserve and enhance designated scenic byways. Consider aesthetic and design elements along with safety and performance considerations on designated byways.

There are no designated OHP scenic byways within the metropolitan area.

**Policy 1F – Highway Mobility Standards**

Maintain acceptable and reliable levels of mobility on the state highway system.

The 2000 RTP level of service policy shown in Table 1.2 is consistent with the Oregon Highway mobility standards for the principal arterial network, with a peak period policy of "E". However, in several urban corridors, an interim one-hour peak period mobility standard of "F" is proposed in the RTP, in recognition of the travel alternatives that exist in these corridors (such as light rail, rapid bus or dense parallel networks of surface streets), and the poor feasibility of adding roadways capacity from an operational and practical standpoint. These interim policy corridors include:

- Banfield Freeway from I-5 to I-205
- Interstate-5 North from Marquam Bridge to Interstate Bridge
- Highway 99E from the Central City to Highway 224
- Sunset Highway from I-405 to Sylvan
- Stadium Freeway from I-5 South to I-5 North

The 2000 RTP recommends that these interim policies be reviewed for consistency with the Oregon Transportation Commission and remains in place until refinement or corridor plans in each of the affected corridors can be completed, and specific level-of-service policies can be developed for each corridor. In April and May, Metro coordinated with ODOT staff on these measures, and proposed that the interim policies also be considered as a refinement to the 1999 Oregon Highway Plan, in light of the detailed analysis completed as part of the 2000 RTP. In each refinement planning effort, Metro and ODOT will work toward a customized level-of-service standard, or mix of multi-modal standards to address mobility needs on a corridor-by-corridor basis. Sections 6.6.1 and 6.6.2 of the 2000 RTP establish a mechanism for updating the RTP to maintain consistency with state plans on performance measure policies and transportation projects.

**Policy 1G – Major Improvements**

Improve system efficiency and management before adding capacity. Work in partnership with regional and local governments to address highway performance and safety needs.

Section 1.3.6 describes the region's system management strategy, and Policy 18.0 requires agencies to implement system management solutions before adding capacity to the regional roadway system. Policy 20.2 establishes operations, maintenance and safety considerations as primary criteria for funding decisions and prioritizing system improvements. In addition, Section 6.6.3 requires Metro and local governments to use the Congestion Management System to evaluate alternatives as part of identifying system needs for roadways capacity.

The level-of-service policy described in Table 1.2 establishes the technical criteria for sizing the transportation system, once congestion management considerations have been evaluated. The Preferred System described in Chapter 3 of the *2000 RTP* is the system of improvements that best meets the LOS policy, and all other policies called out in Chapter 1 of the plan. The Priority System described in Chapter 5 of the plan is a somewhat smaller system that meets most plan policies, including the LOS policy for the principal arterial system, and functions adequately during the 20-year plan period.

The projects included in the *2000 RTP* were developed under the congestion management requirements for regional planning called out in Section 6.6.3 of the *2000 RTP*. Working with local partners, Metro developed projects in a four-step modeling process, with roadway capacity added only after alternatives were considered and a full systems analysis completed for each of three rounds of modeling. A fifth round of modeling will be completed post-adoption, to develop final air quality findings that address federal planning requirements.

**Policy 2G – Rail and Highway Compatibility**

Increase safety and transportation efficiency through reduction and prevention of conflicts between railroad and highway users.

Policies 15.0 and 15.1 of the *2000 RTP* address freight conflicts, including rail freight, that could result in access constrains to critical freight intermodal facilities or impact the function of the regional transportation system, in general. Projects that implement this policy were identified as part of the 2000 RTP, and are included in Appendix 1.1.

**Goal 3 – Access Management**

Assure statewide consistency by managing the location, spacing and type of road/street intersections/approach roads to assure safe/efficient operation of state highways, consistent with the classification of the highways. Plan for the location of medians and openings to enhance the efficiency and safety of the highways and influence & support land use development patterns that are consistent with approved transportation system plans. Manage grade-separated interchange areas to ensure safe & efficient operation between connecting roadways.

The street design classifications in Section 1.3.5 and summarized in Figure 1.4 of the 2000 RTP correlate access policies to implementation of the 2040 Growth Concept. Designs for Throughways (including Freeway and Highway designs shown in Figures 1.5 and 1.6) correlate to the Interstate and Statewide highway designations in the 1999 Oregon Highway Plan, and are consistent with OHP policies for access management and the use of grade-separated intersections. Designs for Boulevards, Streets and Roads (shown in Figures 1.7 through 1.11) address access management for arterial streets in the metropolitan area, and correlate to the District Highway designation in the 1999 Oregon Highway Plan. Access management strategies for driveway and intersection design in these classifications are consistent with the OHP policies.

Section 6.7.3 requires these access management policies to be considered in the project development phase for improvements listed in Appendix 1.1. The exact location of medians, driveways and street intersections is determined at the project development phase.

**Policy 4A – Efficiency of Freight Movement**

Maintain and improve the efficiency of freight movement on the state highway system and access to intermodal connections. Balance the needs of long distance and through freight movements with local transportation needs.

The principal arterial system shown in Figure 1.12 and the Regional Freight System shown in Figure 1.17 were designed to optimize the movement of freight and statewide and interstate travel in major travel corridors, and minimize local travel on these routes. The access management strategies identified for these routes in the street design policies in Section 1.3.5 for Freeway and Highway designs, that apply to the principal arterial system, call for aggressive access management on major routes that are currently compromised by local access policies, yet offer the potential to serve freight and other longer trip needs.

Policies 15.0 and 15.1 further requires that the regional system be maintained and managed to provide a reasonable and reliable travel time for freight movements within the metropolitan area.

The street design classifications described in Section 1.3.5 also call for an emphasis on multi-modal travel and local access to regional and town centers on the major and minor arterial system, providing convenient access from neighborhoods to the nearest source of commercial and civic services.

The regional truck model was used to analyze the performance of the freight system in the second and third rounds of RTP modeling, and refine the freight improvements called for in Appendix 1.1. An accessibility analysis was also performed to evaluate the relative accessibility of centers, ports and intermodal facilities by motor vehicle and transit routes. These analyses were not completed to meet specific performance measures, and instead were used to evaluate overall system performance and travel needs during the first round of RTP modeling and analysis.

**Policy 4D – Transportation and Demand Management**

Support the efficient use of state transportation system through investment in transportation demand strategies (TDM).

Policy 19.0 establishes the region's TDM program, and guides the development of TDM strategies and transportation projects in general in the RTP. The modal targets policies shown in Table 1.3 are the primary benchmark for evaluating the need and efficacy of TDM programs, and must be address in local TSP in the metropolitan area. The RTP systems analysis included a broad range of TDM strategies, including parking policies, transit fare programs and improved bicycle, pedestrian systems and local street connectivity in an effort to reduce travel demand for new roadway capacity. The RTP project list in Appendix 1.1 includes Transportation Management Associations for all of the regional centers identified in the 2040 Growth Concept, and for other major employment areas.

**Investment Policy**

Place the highest priority for investments in the state highway system on safety and managing and preserving the physical infrastructure.

Section 1.3.7 and Policies 20.0 and 20.2 establishes system maintenance and preservation, and safety improvements as primary funding considerations for future investments in the regional system. The financial analysis in Section 4.2 of the *2000 RTP* is based on the assumption that system preservation should take precedence over expansion, and capital revenues are defined as those monies that are not already dedicated to system operation and maintenance.

**OAR 660-012-0020 Elements of Transportation Systems Plans**

(1) Metro's analysis of a "Preferred System" to meet the region's aspirations for a 2020 transportation system consistent with the desired urban form in the 2040 Growth Concept is in Chapter 3 of the 2000 RTP. Due to funding limitations described in Chapter 4, the Priority System in Chapter 5 is established at Section 5.2 as the region's coordinated network of transportation facilities adequate to serve state and regional needs for transportation facilities of regional significance. The degree of consistency in 2020 with the 2040 Growth Concept and the 2020 system performance deemed adequate by the region is described in Table 5.5. The 2020 "No Build" System result in an increase of average weekday VMT per capita of only +1.8% and a reduction in average weekday VMT per employee of about –11.8%.

(2)(a) The regional TSP includes a determination of regional transportation needs relevant to the scale of the regional transportation network including:

- State (identified in the state TSP) and regional transportation needs for transportation facilities of regional significance at Section 1.2, Section 5.2, and Section 5.3.

- Needs of the transportation disadvantaged at Section 1.3.3, Section 6.8.12 and Section 6.8.13.

- Needs for movement of goods and services to support planned industrial and commercial development at Section 1.2, Section 5.2, and Section 5.3.

(2)(b) The regional TSP includes functional classifications of roads of regional significance consistent with the state TSP and providing for continuity between adjacent jurisdictions in Section 1.3.5.

Requirements on the spacing of future extensions and connections needed to provide reasonably direct routes for bicycle and pedestrian travel is provided in Section 6.4.5, based on Metro's functional plan authority in ORS 268.390.

(2)(c) The regional TSP's public transportation plan

(A) describes public transportation services for the transportation disadvantaged and identifies service inadequacies at Policy 14(c) and Sections 5.1 and 5.2.

(B) describes intercity bus and passenger rail service at Fig. 1.16 and accompanying text entitled "Interurban Public Transportation" and identifies the location of terminals at Fig. 1.16.

(C) identifies public transit routes, terminals, major transfer stations, and major transit stops in Figure 1.16 and Section 6.4.10.

(D) evaluates the feasibility of developing a public transit system for areas not currently served consistent with the TPR at Section 5.3.

(2)(d) The regional TSP's bicycle and pedestrian plan network and list of facility improvements consistent with ORS 366.514 is in Policy 16.0, 17.0, Figure 1.18, Figure 1.19, and accompanying text.

(2)(e) The regional TSP's air, rail, water and pipeline transportation plan which identifies public use airports, mainline and branchline railroads and railroad facilities, port facilities, and major regional pipelines and terminals is in Fig. 1.17 and accompanying text.

(2)(f) The regional TSP's transportation system management and demand management plan is at Section 1.3.6, Policies 18.0 and 19.0, 19.1 and 19.2 and accompanying text.

(2)(g)The regional TSP's parking plan which plans to achieve a 10% reduction in the number of spaces per capita and aids in reducing VMT per capita by 2020 is in Policy 19.1 and Title 2 of the Urban Growth Management Function Plan which complies with OAR 660-012-0045(5)(e)(A)-(F) and includes regulations setting minimum and maximum parking requirements in appropriate locations.

The decision record indicates that the parking plan is consistent with demand management programs, transit-oriented development requirements and planned transit service.

(2)(h) Generally, this requirement for land use regulations for implementing the TSP is applicable to local TSPs by the cities and counties which are responsible for land use regulations. Regional TSP policies requiring land use regulations for implementing the regional TSP in compliance with OAR 660-012-0035(5) to reduce reliance on the automobile are in Section 6.4.7 for local TSPs and Section 6.6.3 for the regional TSP.

- Links between transit-oriented land use developments to transit on lands along transit routes is identified in Figure 1.15.

- Policy 19.0 and Table 1.3 implements a demand management program to meet the measurable standards for reducing reliance on the automobile

(2)(i) The regional TSP's transportation financing program with a list of planned facilities and improvements, a general estimate of their timing, rough cost estimates and policies to guide selection of projects for funding are at Chapter 4, Section 5.2 and Appendix 1.1. Section 1.3.5 and Section 3.2 of the decision record indicates that the selection policies consider improvements that support mixed-use, pedestrian friendly development and increased use of alternative modes, including, but not limited to the four-step modeling process documentation.

The financing program discusses existing funding mechanisms and possible new mechanisms to fund listed projects in Chapter 4 and Section 5.4 Priority System Financing.

The financing program provides for phasing of major improvements to encourage infill and redevelopment of urban lands prior to major transportation facility improvements which would cause premature development of urbanizable lands in Section 5.4.1 policy objectives and Section 6.5.4.

**OAR 660-012-0025 Complying with Applicable Statewide Goals**

(1), (2) Except for the refinement plans indicated below, this regional TSP constitutes the land use decision regarding the need for transportation facilities and their function, mode and general location based on the following findings:

The 2020 Priority System adequately meets the travel needs of the region for the next 20 years by identifying and addressing the most critical improvements needed to implement the acknowledged 2040 Growth Concept and improve the safety of the region's transportation system consistent with applicable statewide goals. The development of the 2020 Priority System was based on the modal policies and functional classification maps contained in Section 1.3.5 and the land use and transportation principles for implementing the 2040 Growth Concept in

Section 1.2. These policy provisions of the 2000 RTP establish a long-term vision for completing the various modal systems (motor vehicle, transit, freight, bicycle and pedestrian) in a manner that complements and supports the 2040 Growth Concept.

The 2020 population and employment forecast in Section 2.1 through 2.3 establishes a 20-year RTP planning period context for determining which transportation improvements are most needed to move toward the 2040 Growth Concept, with the functional maps in Section 1.3.5 serving as the template for where projects are needed, and the function that they serve. In the case of motor vehicle system improvements, the CMS process set forth in Section 6.6.3 establishes a further methodology for defining the scale of roadway capacity improvements necessary to meet 20-year transportation needs. For other modal projects, population and employment forecasts and the infrastructure needs of individual 2040 land use components are the basis for determining need. Finally, operations and maintenance and existing safety needs are also represented in the Priority System project recommendations, consistent with Policies 20.2 and 20.3.

Because implementation of the 2040 Growth Concept land use components, as described in Section 1.2, provide the basis for determining transportation needs, the projects described in the Priority System in Chapter 5 are organized according 2040 land use types. The seven subareas used to describe transportation needs and solutions in Chapter 5 are centered on the primary land use components described in Section 1.2. These primary land use components include the central city, regional centers and industry and intermodal facilities. Therefore, each subarea is centered on one or two of these primary 2040 land use components, and roughly covers surrounding trade areas that are oriented toward these key land use components.

For each of seven geographic subareas identified in the 2000 RTP for analysis purposes, identification of transportation needs and development of the planned Priority System improvements was guided by the policies in Chapter 1 and travel demands in Chapter 2 of the 2000 RTP, and coordinated with local governments and other transportation service providers consistent with Section 6.6.3 and Appendix 1.3. Section 6.6.3 requires Metro to evaluate alternatives to roadway capacity to meet identified transportation needs. Working with local governments Metro developed projects to address needs in a four-step modeling process with roadway capacity added only after alternatives were considered and a full systems analysis completed for each of four rounds of modeling. Chapter 1 of the 2000 RTP includes six regional system maps which define the function and mode of transportation facilities designated on the regional street design system map (Fig. 1.4), regional motor vehicle system map (Fig. 1.42), the regional public transportation system map (Fig. 1.16), the regional freight system map (Fig. 1.17), the regional bicycle system map (Fig. 1.18) and the regional pedestrian system maps (Fig. 1.19). These systems maps are based on Section 1.2 including the 2040 Growth Concept Map (Figure 1.0) and other Chapter 1 policies.

Chapter 2 of the 2000 RTP describes the expected land uses and travel demand for the year 2020 based on implementation of the 2040 Growth Concept and predicted population and employment growth. The investments included in the Priority System address transportation needs throughout the region which leverage the primary 2040 design types, including the central

city, regional centers, industrial areas and intermodal facilities, town centers and major transit corridors. Transportation projects and strategies for each subarea are identified to focus on the individual travel needs of these areas. In summary, the 2020 Priority System:

- Addresses regional operations, maintenance and preservation needs
- Substantially preserves "Regional Highways" function as defined in Table 1.2, generally consistent with the 1999 Oregon Highway Plan level of service policy
- Implements the most significant components transportation needs for primary land use areas such that the central city and most regional centers are served by light rail transit, have direct access to the regional highway system and are targeted with a mix of TDM, arterial street, pedestrian and bicycle systems improvements. Most industrial areas have strong connections to regional highway system and intermodal facilities.
- Addresses many secondary land-use components transportation needs such that most town centers, corridors and main streets are served by regional transit and targeted with a mix of arterial street, pedestrian and bicycle systems improvements
- Addresses some needs for other 2040 Growth Concept land-use components such that many neighborhoods and employment areas served by priority system improvements to regional and community transit, arterial capacity improvements and some improvements to the pedestrian and bicycle systems
- Forwards the more detailed, local implementation issues to cities and counties, who will address these issues such as local system needs and isolated congestion as part of local TSPs.

The following explains how the planned facilities, services and major improvements in the 2020 Priority System in Chapter 5 were determined for the seven RTP Subareas. A map showing of the general location of each Priority System improvement as well as a text description of the improvement, including the number of lanes, modal elements provided and general location. Appendix 1.1 also includes a text description of each improvement and identifies the primary provider of each transportation facility or service improvement, estimated project cost and timing for implementation.

**Subarea 1: West Columbia Corridor**

The Columbia Corridor is an important freight destination in the region – with several employment areas, industrial areas and intermodal facilities located within the area. The subarea includes Hayden Island employment and industrial areas, important marine terminals, the Delta Park employment area, Portland International Airport and adjacent employment areas and Swan Island employment and industrial areas. Based on Chapter 1 policies and Chapter 2 expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Maintain peak and off-peak period freight mobility throughout the subarea

- Maintain an adequate level of motor vehicle access to the Portland central city from north and northeast Portland neighborhoods, industrial areas and intermodal facilities and Clark County, Washington.

- Maintain an adequate level of bicycle, pedestrian and transit access to the Portland central city from other parts of the region

- Maintain an adequate level of motor vehicle and freight access from the Rivergate industrial area and West Hayden island intermodal facilities to I-5, I-205 and Northeast Portland Highway

- Better manage the flow of existing motor vehicle traffic on existing freeways and arterial streets with ITS and TDM strategies and improve transit service reliability through the use of transit preferential treatments

- Reduce the need for freight use of Marine Drive east of I-205, the Banfield Freeway and inner northeast portions of I-5

- Provide better bicycle and pedestrian connections to and within the central city and St. Johns town center

- Improve pedestrian access to transit along major transit corridors such as Lombard Street

- Provide a transit alternative to I-5 with light rail transit and expanded bus service on parallel arterial streets

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.10 with text descriptions of each project on the back of the map. The combination of modes planned for this subarea (shown by color in Figure 5.10) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-auto modes to meet identified travel demand prior to recommending significant road capacity. *See,* Section 6.6.3 for a description of this requirement and Section 3.2 for a description of how the 2000 RTP meets this requirement.

**Subarea 2: Portland Central City and Neighborhoods**

Located in the center of the subarea is the Portland central city, including the downtown business district, the Lloyd District, the Central Eastside Industrial District, the River District and the North Macadam District. As a primary land-use component in the 2040 Growth Concept, the Portland central city is a focus of many priority system improvements. Town centers in the subarea include Hollywood, St. Johns, Hillsdale, Raleigh Hills and West Portland.

Based on Chapter 1 policies and expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Maintain an adequate level of motor vehicle access to the Portland central city from Portland neighborhoods, adjacent town centers, industrial areas and intermodal facilities and Clark County, Washington.

- Improve motor vehicle and freight connections to the Central Eastside Industrial District and Highway 99E/224 corridor

- Maintain an acceptable level of motor vehicle and freight access to and from the Portland central city from regional highways such as I-84, US 26 and I-5

- Provide a transit alternative to peak period congestion expected along I-5, I-84, 99E, US 26 including expanded transit service on parallel arterial streets and traffic management strategies to better accommodate expected traffic growth in these corridors

- Mitigate motor vehicle through-traffic infiltration on adjacent arterial streets due to congestion on I-84

- Provide a better motor vehicle through-traffic transition from Highway 99E to Highway 224 in Milwaukie

- Preserve access to and from Union Station by all modes of travel, including bus, light rail, passenger rail, motor vehicles, walking and bicycles

- Maintain an adequate level of motor vehicle and freight access from the Rivergate industrial area and West Hayden island intermodal facilities to I-5, I-205 and Northeast Portland Highway

- Better manage the flow of existing motor vehicle traffic on existing freeways and arterial streets with ITS and TDM strategies and improve transit service reliability through the use of transit preferential treatments

- Provide better bicycle and pedestrian connections to and within the Hollywood, St. Johns, Lents, Hillsdale, Raleigh Hills and West Portland town centers

- Improve pedestrian access to transit along major transit corridors such as Sandy Boulevard, Barbur Boulevard, Burnside Street and Grand/Martin Luther King Jr. Boulevard

- Improving multi-modal design of major streets that serve major centers, including Burnside Street, Division Street and Grand/Martin Luther King Boulevard

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.11 with text descriptions of each project on the back of the map.

The combination of modes planned for this subarea (shown by color on Figure 5.11) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-automobile modes to meet identified travel demand before adding road capacity. *See,* Section 6.6.3 for description of this requirement and Section 3.2 for a description of now the 2000 RTP meets this requirement.

**Subarea 3: East Multnomah County (Figure 5.12)**

Gresham and Gateway regional centers are located in this subarea and are the focus of many priority system improvements. Town centers in the subarea include Lents, Troutdale, and Fairview/Wood Village. Based on Chapter 1 policies and expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Maintain an adequate level of motor vehicle access to the Portland central city from Gateway and Gresham regional centers, and other parts of East Multnomah County
- Provide interim motor vehicle and freight improvements along the 242nd Avenue corridor in Gresham for an eventual highway link between I-84 and US 26
- Provide adequate motor vehicle access to the major growth area of Pleasant Valley/Damascus
- Preserving access to and from the Gresham and Gateway regional centers by all modes of travel
- Improving multi-modal design of major streets that serve major centers, including Stark Street, Burnside Street, Division Street and 181st Avenue
- Provide a transit alternative to peak period congestion expected along I-84, 242nd Avenue and I-205 including expanded transit service on parallel arterial streets and traffic management strategies to better accommodate expected traffic growth in these corridors
- Mitigate motor vehicle through-traffic infiltration on adjacent arterial streets due to congestion on I-84
- Maintain an adequate level of motor vehicle and freight access from industrial areas and intermodal facilities to I-5 and I-205
- Better manage the flow of existing motor vehicle traffic on existing freeways and arterial streets with ITS and TDM strategies and improve transit service reliability through the use of transit preferential treatments
- Provide better bicycle and pedestrian connections to and within the Lents, Troutdale, and Fairview/Wood Village town centers

- Improve pedestrian access to transit along major transit corridors such as Foster Road, Powell Boulevard, Division Street and Burnside Street

- Improving freight access to Portland international Airport and intermodal facilities in the west Columbia Corridor

- Improving substandard rail overcrossings that limit freight mobility on north/south arterial streets in the area

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.12 with text descriptions of each project on the back of the map.

The combination of modes planned for this subarea (shown by color on Figure 5.12) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-automobile modes to meet identified travel demand before adding road capacity. *See,* for a description of this requirement and Section 3.2 for a description of how the 2000 RTP meets this requirement.

**Subarea 4: Pleasant Valley and Damascus**

The Pleasant Valley/Damascus subarea includes portions of rural Clackamas County south of Gresham and east of the existing urban growth boundary. The subarea includes Pleasant Valley and Damascus town centers and adjacent urban reserves. Based on Chapter 1 policies and expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Develop a conceptual network of arterial and collector streets for all modes of travel adequate to serve planned growth in the Pleasant Valley and Damascus urban reserve areas, while protecting environmentally sensitive areas and adjacent rural reserves from the impacts of urban traffic

- Develop a new highway link between I-205 and US 26 in phases along the Highway 212 corridor

- Maintain an acceptable level of motor vehicle accessibility to the Clackamas and Gresham regional centers from the Damascus town center and surrounding neighborhoods

- Connect to 182nd Avenue via 190th Avenue and Highland Drive to create a major north-south motor vehicle spine to focus development in the Pleasant Valley/Damascus area and provide a through-route from I-84 to the Sunrise Corridor

- Time Sunrise Corridor phases to reinforce development of Damascus/Pleasant Valley urban reserves and protect adjacent rural reserves from urban traffic impacts

- Maintain an acceptable level of motor vehicle access from the developing Pleasant Valley and Damascus town centers to employment areas along the Foster Road/Powell Boulevard corridor and the central city

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.13 with text descriptions of each project on the back of the map.

The combination of modes planned for this subarea (shown by color on Figure 5.13) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-automobile modes to meet identified travel demand before adding road capacity. *See,* Section 6.6.3 for a description of this requirement and Section 3.2 for a description of how the 2000 RTP meet this requirement.

**Subarea 5: Urban Clackamas County**

Oregon City and Clackamas regional centers are located in this subarea and are the focus of many priority system improvements. Town centers in the subarea include Milwaukie, West Linn and Lake Oswego. Based on Chapter 1 policies and expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Maintain an adequate level of motor vehicle access to and from Oregon City and Clackamas regional centers
- Provide motor vehicle and freight improvements along Highway 213 to improve access to the Clackamas industrial area
- Maintain regional mobility along the corridor, including providing a transit alternative to Highway 224 and provide improved transit access to Milwaukie town center and Clackamas regional center
- Provide a better motor vehicle connection between Highway 99E and Highway 224 at Milwaukie
- Preserve I-205 freight mobility from I-5 to Clark County, with an emphasis on connections to Highway 213, Highway 224 and the Sunrise Corridor
- Provide adequate motor vehicle access to the major growth area of Pleasant Valley/Damascus
- Preserve access to and from the Oregon City and Clackamas regional centers by all modes of travel
- Improve multi-modal design of major streets that serve major centers, including McLoughlin Boulevard, Sunnyside Road and 82nd Avenue

- Provide a transit alternative to peak period congestion expected along I-205 including expanded transit service on parallel arterial streets and traffic management strategies to better accommodate expected traffic growth in these corridors

- Maintain an adequate level of motor vehicle and freight access from industrial areas and intermodal facilities to I-5 and I-205

- Better manage the flow of existing motor vehicle traffic on existing freeways and arterial streets with ITS and TDM strategies and improve transit service reliability through the use of transit preferential treatments

- Provide better bicycle and pedestrian connections to and within the Oregon City and Clackamas regional centers and West Linn, Lake Oswego and Milwaukie town centers

- Emphasize more street connectivity, better bicycle and pedestrian connections and improved pedestrian access to transit

- Improve pedestrian access to transit along major transit corridors such as Sunnyside Road and McLoughlin Boulevard

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.14 with text descriptions of each project on the back of the map.

The combination of modes planned for this subarea (shown by color on Figure 5.14) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-automobile modes to meet identified travel demand before adding road capacity. *See,* Section 6.6.3 for a description of this process and Section 3.2 for a description of how the 2000 RTP meets this requirement.

**Subarea 6: South Washington County**

Washington Square regional center is located in this subarea and is the focus of many priority system improvements. Town centers in the subarea include Durham, Tigard, King City, Lake Grove, Murray Hill, Rivergrove, Tualatin, Sherwood and Wilsonville. The Kruse Way employment area is also included in this subarea. Based on Chapter 1 policies and expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Preserve adequate motor vehicle access to and from I-205 and Highway 217, and to Washington Square regional center

- Maintain off-peak freight mobility

- Define a long-term strategy for managing increased travel demand along I-5 in the Willamette Valley

- Improve regional access to 99W and inter-regional connections to Newberg, McMinnville and Highway 18 to the coast

- Balance motor vehicle improvements with impacts on Tualatin and Sherwood town centers, the Tualatin industrial area and adjacent rural reserves

- Preserve access to and from the Washington Square regional center by all modes of travel

- Improve multi-modal design of major streets that serve major centers, including Hall Boulevard, Tualatin-Sherwood Road, 99W, Wilsonville Road and Greenburg Road

- Provide a transit alternative to peak period congestion expected along Highway 217, including commuter rail, expanded transit service on parallel arterial streets and traffic management strategies to better accommodate expected traffic growth in these corridors

- Maintain an adequate level of motor vehicle and freight access from industrial areas and intermodal facilities to I-5, I-205 and Highway 217

- Better manage the flow of existing motor vehicle traffic on existing freeways and arterial streets with ITS and TDM strategies and improve transit service reliability through the use of transit preferential treatments

- Provide better bicycle and pedestrian connections to and within the Washington Square regional center and Durham, Tigard, King City, Lake Grove, Murray Hill, Rivergrove, Tualatin, Sherwood and Wilsonville town centers.

- Improve pedestrian access to transit along major transit corridors such as Hall Boulevard, 72nd Avenue and 99W

- Emphasize more street connectivity, better bicycle and pedestrian connections and improved pedestrian access to transit

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.15 with text descriptions of each project on the back of the map.

The combination of modes planned for this subarea (shown by color on Figure 5.15) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-automobile modes to meet identified travel demand before adding road capacity. *See,* Section 6.6.3 for a description of this process and Section 3.2 for a description of how the 2000 RTP meets this requirement.

**Subarea 7: North Washington County**

Beaverton and Hillsboro regional centers are located in this subarea and are the focus of many priority system improvements. Town centers in the subarea include Forest Grove, Cornelius, Sunset, Cedar Mill, Bethany, Tanasbourne and Farmington. The Sunset industrial

area, west-side light-rail station communities, Sunset Highway, Tualatin Valley Highway, Highway 217 and several urban reserve areas north of US 26 and south of Tualatin Valley Highway are also located in this subarea. Based on Chapter 1 policies and expected population and job growth, planned facilities, services and improvements defined in the 2020 Priority System for this subarea are needed to:

- Preserve adequate motor vehicle access to and from to the Portland central city and the Sunset industrial area via US 26
- Maintain off-peak freight mobility
- Maintain Tualatin Valley Highway as primary connection between the Hillsboro and Beaverton regional centers
- Preserve access to and from the Beaverton and Hillsboro regional centers by all modes of travel
- Improve multi-modal design of major streets that serve major centers, including Hall Boulevard, Murray Boulevard, Walker Road and Cornell Road
- Provide a transit alternative to peak period congestion expected along Highway 217 and US 26, including commuter rail, expanded transit service on parallel arterial streets and traffic management strategies to better accommodate expected traffic growth in these corridors
- Maintain an adequate level of motor vehicle and freight access from industrial areas and intermodal facilities to I-5, I-205 and Highway 217
- Better manage the flow of existing motor vehicle traffic on existing freeways and arterial streets with ITS and TDM strategies and improve transit service reliability through the use of transit preferential treatments
- Provide better bicycle and pedestrian connections to and within the Beaverton and Hillsboro regional centers and Forest Grove, Cornelius, Sunset, Cedar Mill, Bethany, Tanasbourne and Farmington town centers.
- Improve pedestrian access to transit along major transit corridors such as Hall Boulevard, Murray Boulevard, Walker Road, Beaverton Hillsdale Highway and Tualatin Valley Highway
- Emphasize more street connectivity, better bicycle and pedestrian connections and improved pedestrian access to transit

The general locations of the transportation facilities for the Priority System for this subarea are shown on Figures 5.4 and 5.16 with text descriptions of each project on the back of the map.

The combination of modes planned for this subarea (shown by color on Figure 5.16) for each facility were determined through a four-step modeling process which applied the federally required approach of using non-automobile modes to meet identified travel demand before adding road capacity. *See,* Section 6.6.3 for a description of this process and Section 3.2 for a description of how the 2000 RTP meets this requirement.

**OAR 660-012-0025 Refinement Plans**

MPOs may defer decisions regarding function, general location and mode of a refinement plan by adopting findings which the need for which identify a decision is being deferred, demonstrate why information to make final decisions are not available, explain how deferral does not preclude implementation of the regional TSP, describe issues to be resolved and demonstrate that the refinement will be completed within three years.

The 2000 RTP identifies refinement plans for the following corridors in Section 6.7.6 of the 2000 RTP:

- Interstate-5 North (I-84 to Clark County)
- Interstate-5 South (Highway 217 to Wilsonville)
- Interstate-205
- Highway 99E-Highway 224
- Powell Boulevard/Foster Road
- Highway 217
- Tualatin Valley Highway
- North Willamette Crossing

The title of the preceding section 6.7.5 ("Specific Corridor Refinements") may imply that the additional corridors called out in this section are also subject to refinement planning. However, the function, general location and mode in these corridors has been defined in the 2000 RTP. Instead, Section 6.7.5 is intended to identify specific corridor planning requirements for major corridors that must be addressed in the NEPA and project development stage. For clarity, the title of section 6.7.5 will be revised to read "Corridor Design Considerations" and section 6.7.6 to read "Corridor Refinement Plans."

(3)(a) Identify the transportation need for which decisions regarding function, general location or mode are being deferred;

The transportation need for improvements in the corridors listed above is generally established in Sections 3.1, 3.2 and 3.3 of the 2000 RTP. Detailed, corridor-specific findings for these needs are established in Section 3.4.

(3)(b) Demonstrate why information required to make final determinations regarding function, general location or mode cannot reasonably be made at the time of adoption;

For each of the refinement plans listed in Section 6.7.6, four rounds of transportation modeling and analysis were used to narrow the set of possible solutions for forecasted travel demand. However, these, and other solutions must be considered through a more detailed corridor planning process before the mode, function and general location in specific projects can be advanced.

The complexity of transportation issues involved in each of these corridors is easily of a scale comparable to the recently completely South Willamette Crossing Study, which took four years, and more than $500,000 to complete. One of the refinement corridors - the I-5 trade corridor - is currently being studied, and will likely take several years, and more than $1 million to complete. Currently, there are no funds identified to complete the additional corridor refinement planning required to advance projects in these areas.

Sections 6.7.1 through 6.7.4 establish the process for completing these studies, and forwarding the resulting recommendations to JPACT and the Council as possible RTP amendments. The individual corridor descriptions in Section 6.7.6 outline many of the preliminary conclusions on possible transportation solutions in these corridors, and require that these solutions be further considered as part of the more detailed corridor planning process.

(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;

For each identified refinement corridor identified in Section 6.7.6, Metro has developed a detailed set of modeling assumptions for additional system capacity that has served as a placeholder for future improvements recommendations from individual corridor studies. These placeholder projects were developed in partnership with ODOT, Tri-Met, the three counties and 24 cities in the metropolitan area, and will also be used in local TSPs as placeholders, until specific projects are advanced from corridor studies. The placeholder projects were developed consistent with the Congestion Management System process set forth in Section 6.6.3, and are detailed in the 2000 RTP Modeling Assumptions summary document, and described in Appendix 1.1.

(3)(d) Describe the nature of the findings which will be needed to resolve issues deferred to a refinement plan;

Each of the refinement corridors described in Section 6.7.6 includes a number of function, mode and locational considerations that must be addressed in the corridor planning

process. In addition, the corridor planning process is intended to make other findings on corridor issues that have not been anticipated in the 2000 RTP.

(3)(e) Demonstrate that the refinement effort will be completed within three years or prior to initiation of the periodic review following adoption of the TSP.

Though the timing of individual refinement planning efforts will be determined in the Unified Work Program, the intent of all requirements set forth in Chapter 6 of the 2000 RTP is that unresolved issues, including refinement planning, be completed prior to the next scheduled RTP update. Section 6.6.4 and federal planning requirement stipulate that the RTP be updated every three to five years.

**OAR 660-012-0030 Determination of Transportation Needs**

(1)(a) Chapter 2 of the 2000 RTP describes the expected land use and travel plans for the year 2020 based on the 2020 population and employment forecast (-0030(3)(a)) consistent with the state OHP, acknowledged comprehensive plans, including Metro's acknowledged urban growth boundary, plus implementation of Metro's acknowledged 2040 Growth Concept (-0030(3)(a)). How the application of these land use policies to the projected growth in the forecast (Sections 2.1 and 2.3) will affect the regional transportation system is described in Chapter 2 as the "2020 No Build System" performance (Section 2.5):

- Overall the number of person trips are expected to increase by 2020 at a faster rate than the rate of population growth and less than the rate of employment growth. Despite an estimated increase in overall vehicle miles traveled ("VMT") of nearly 50%, VMT per capita are estimated to increase only about 3.7% and VMT per employees are expected to decline by almost 10%. (*See,* Table 2.6).

- Average motor vehicle speeds are estimated to be reduced about 24%, increasing average travel times by about 27% with +146% increase in congested freeway miles and +310% increased in congested arterials. (*See,* Table 2.7).

- As a percent of total person trips, walk trips increase +31%, bike trips increase 24%, transit trips increase +15% by 2020. (*See,* Table 2.8).

- Average total truck trips increases +32%, and truck travel times increase by +30% by 2020. (*See,* Table 2.9)(-0030(1)(a)).

- Major corridor auto travel times increase from +13 to +96% and transit times increase from –34% (new existing light rail) to +75% by 2020. (*See,* Table 2.10).

(1)(b) The needs of the transportation disadvantaged are identified in Sections 13.3, 6.8.12 and 6.8.13.

(1)(c) The needs for movement of goods and services to support industrial and commercial development are in Sections 1.2, 5.2 and 5.3.

(4) Measures adopted pursuant to –0045 to reduce reliance on the automobile are included in the calculation of regional transportation needs by Table 1.2.

**OAR 660-012-0035 Evaluation and Selection of System Alternatives**

(1) The decision record indicates that improvements to existing facilities, new facilities with combination of modes, transportation system management measures, demand management measures and a no build alternative were used as components of system alternatives evaluated as part of a four-step modeling process consistent with Section 6.6.3 and Appendix 1.3.

(2) Metro evaluated alternative land use designations, densities, and design standards to meet regional transportation needs in adoption of the acknowledged 2040 Growth Concept and the implementing Urban Growth Management Functional Plan which require cities and counties to amend their comprehensive plans, if necessary, to accomplish the following:

> (a) increase residential densities in 2040 design type areas prioritized for transportation access and establishing minimum residential densities for all residential zones. (UGMFP, Title 1)
>
> (b) increased densities in commercial and retail developments
>
> (c) encourage development of shopping centers in 2040 design types with convenient walking and cycling to residential areas by restricting siting in other design types. (UGMFP, Title 4)
>
> (d) establishing regional policy of designating land to provide a better balance between jobs and housing considering the total number of expected jobs and housing units (RUGGO, Goal 11.4), the availability of affordable housing (RUGGO, Objective 17), and provision of housing opportunities in close proximity to employment areas (2040 Growth Concept, centers policies).

(3)(a) The transportation system provides types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged 2040 Growth Concept as indicated by Section 1.3 and implemented through Section 6.6.

(b) The transportation system is consistent with state and federal standards in the SIP for air quality as indicated by Sections 6.1.2 and 6.1.3.

(c) The transportation system minimizes adverse economic, social, environmental and energy consequences as indicated by Section 1.3 and implemented through Section 6.6.

(d) The transportation system minimizes conflicts and facilitates connections among modes as indicated by Section 1.3 and implemented through Section 6.6.

(e) *See,* findings on 660-012-0035(5), below.

**OAR 660-012-0035(4), (5) Reducing Automobile VMT Per Capita**

(4) Metro's regional TSP's is required by (4)(b), (c) to be designed to either achieve a 10% reduction of Vehicle Miles Traveled ("VMT") per capita within 20 years and an additional 5% reduction within 30 years or demonstrate an alternative standard for reduction of VMT per capita under (5).

(5)(a) Like all other MPOs, Metro is requesting Commission authorization to use alternative standards in place of these VMT reduction standards to demonstrate progress towards achieving reduced automobile reliance as follows.

The alternative standard for reduction of VMT per capita to demonstrate progress towards achieving reduced automobile reliance has four elements. Three of these elements (street connectivity, parking requirements, and Transportation Demand Management) were used to evaluate the Priority System improvements in each of four rounds of modeling. In Round 4 an estimated 1.8% increase in VMT per capita in 2020 was achieved. The fourth element is a functional plan requirement for city and county TSPs to establish non-SOV mode share targets consistent with Table 1.3 of the 2000 RTP. These mode share targets are regulations in comprehensive plans which will further reduce VMT per capita.

The alternate standard complies with the following rule requirements:

Achieving the alternative standard:

(A) Will result in reduction in reliance on automobiles.

(B) Will accomplish a significant increase in the availability or convenience of alternative modes of transportation.

(C) Is likely to result in a significant increase in the share of trips by alternative modes, including walking, bicycling, ridesharing and transit.

(D) Means that VMT per capita is unlikely to increase by more than 1.8%.

(E) Is measurable and reasonably related to achieving the goal of reduced reliance on the automobile.

In Appendix 1.2, the Round 4 Systems Performance Measure Table for Intra-UGB trips under the Motor Vehicle Data Section at line 5 states the baseline measure of VMT per capita in the region. In the 1994 base year, the average weekday trips were 14.1 miles per person.

Appendix 1.8 details assumptions used to evaluate the strategic (priority) system improvements in Round 4 modeling.

The first assumption is achievement of the street connectivity requirements of Title 6 of the 1996 Urban Growth Management Functional Plan ("UGMFP") which have been incorporated into the 2000 RTP. The second assumption is achievement of the parking requirements of Title 2 of the UGMFP which are made part of the regional TSP by the ordinance adopting the 2000 RTP. The third assumption applies two Transportation Demand Management ("TDM") policies. Reduced transit fare programs for centers and expansion of downtown "fareless square" outlined in Policy 19.0 and Section 1.3.6 were assumed.

The result of Round 4 modeling of the 2000 RTP Priority System improvement parts of the alternative standard was 1.81% increase of VMT to 14.3 miles per person in 2020. This result demonstrates a reduction in reliance on the automobile over the no build system in Chapter 2 and that an increase in VMT per capita by more than 5% in 2020 is unlikely.

However, the improved mode share results of applying the first three elements of the alternative standard for reduction of VMT per capita is used as the starting point for an additional functional plan requirement. Section 6.4.6 requires each city and county in the region to establish non-SOV mode share targets consistent with Table 1.3 and identify actions to result in progress toward improving non-SOV mode share. These mandatory mode share targets, then, could further reduce VMT per capita in 2020 from the 1.81% increase calculated using the first three elements of the alternatives standard. The improved non-SOV mode share that is estimated to result from the application of the first three elements of the alternative standard are used as the starting point for improvements in mode split. The table in Appendix 1.8 has a column which displays the strategic system non-SOV modal performance results entitled "2020 Non-SOV Modal Performance." The results of Round 4 modeling of the Strategic System improvements together with the alternative VMT standard assumptions are displayed by 2040 design type area. These are the 2020 non-SOV mode shared percentages for each 2040 area.

In summary, the application of all four elements of the alternative standard for reduction of VMT per capita achieves compliance with the TPR. The transit fare reductions achieve a significant increase in availability and convenience of alternative modes of transportation. Increased street connectivity, transit fare reductions, parking regulations, and mode split targets are likely to result in a significant increase in the share of trips by non-SOV modes. An increase in VMT per capita by 2020 is likely to be less than 1.8% as indicated by the Round 4 measurements in Appendices 1.2 and 1.8. The regional TSP contains policies at Section 6.5.3 to evaluate progress toward achieving the alternative standard regularly, including monitoring and reporting of VMT per capita.

(b) Credit for regional plans, programs and actions since 1990 is given for alternative standards in place of (4) VMT reduction standards. These plans and actions are described in (5)(c), below and street connectivity from Title 6 of the 1996 Urban Growth Management Functional Plan is part of the alternative standard for VMT reduction in (5)(a), above.

(c) Integrated Land Use and Transportation Plan

Metro's "integrated land use and transportation plan" is comprised of four key elements. The first key element, the 2000 RTP, contains the transportation component of Metro's "integrated land use and transportation plan" in its Regional Framework Plan ("RFP"). The second key element of the integrated plan, the 2040 Growth Concept, was adopted in 1995, acknowledged by LCDC as part of regional goals and objectives, and revised for transportation policy in the 1997 Regional Framework Plan. The 2040 Growth Concept is part of the RFP components scheduled for LCDC acknowledgment on September 28, 2000.

The third key element of the integrated plan is the 1996 Urban Growth Management Functional Plan ("UGMFP") that was included in the 1997 Regional Framework Plan. Pursuant to Metro's unique authority in ORS 268.390(4), this functional plan requires changes to city and county comprehensive plans, if necessary, to accomplish the following TPR "considerations" in OAR 660-012-035(2)(a)-(d):

(A)

- Increased residential densities for all transit station and center areas and minimum residential densities of about 80% of maximum densities in all zones which contain residential uses. (Title 1, UGMFP.)

- Increased commercial and retail densities by establishing minimum Floor Area Ratios ("FAR") in all 2040 Growth Concept centers.

- Designation of 2040 design type boundaries to assure convenient walking and cycling to mixed use centers from residential centers. (Title 1, Section 3 UGMFP.)

- Establishing the regional policy of designating land uses and making land available for a better balance between jobs and housing in regional and town center areas for total number of jobs and housing, availability of affordable housing and provision of housing proximate to employment areas. (Regional Framework Plan Policies, 2040 Growth Concept.)

The fourth key element of the integrated plan was the adoption of the 1997 Regional Framework Plan. This regional plan was required by the 1992 Metro Charter. Along with the 2040 Growth Concept and the UGMFP, the Regional Framework Plan contains more policies for an integrated land use and transportation plan on urban form, affordable housing, open spaces, water quality and stream corridor protection. Chapter 2 of the 1997 RFP contains the transportation policies to integrate regional land use polices with the supporting transportation system. The 2000 RTP, in Chapter 1, updates the 1997 RTP transportation polices, replacing them. Additional functional plan requirements for level of service standards, connectivity (Title 6) and parking (Title 2) were included in the 1996 UGMFP and updated in this 2000 RTP.

(B) Included in these new 2000 RTP/RFP policies are significant new transportation demand management measures in Section 6.4 of the 2000 RTP.

(C) A public transit plan that includes a significant expansion in transit service is reflected in Policy 14.0, Figure 1.16 and accompanying text, and Figure 5.4.

(D) Major roadway improvement policies in Policies 13.0, 18.0, 19.0, 19.1, 19.2, Figure 1.12 and accompanying text to ensure that their effects are consistent with the strategy for reduced reliance on the automobile.

(d) The primary alternative is 2040 Regional Non-SOV-modal targets in Table 1.3 and accompanying text.

**OAR 660-012-0035(6) Measurable Objectives**

(a) The regional TSP specifies measurable objectives for an increase in the modal share of non-SOV trips at Section 1.3.6, Table 1.3. These Modal Share Targets are required to be included in city and county TSPs. Progress is measured by identification of actions consistent with Section 6.4.6.

(b) The regional TSP specifies measurable objectives for an increase in average automobile occupancy at Section 6.5.3. Progress is measured by benchmarks tied to Chapter 1 policies and objectives.

(c) The regional TSP specifies measurable objectives for a decrease in the number or length of automobile vehicle trips per capita due to demand management programs at Sections 1.3.6 and 6.5.3. Progress is measured by benchmarks tied to Chapter 1 policies and objectives.

**OAR 660-012-0035(7) Interim Benchmarks**

The regional TSP requires interim benchmarks at five year intervals to assure satisfactory progress towards meeting requirements to reduce reliance on the automobile at Section 6.5.3.

**OAR 660-012-0040**

The regional TSP includes a Transportation Financing Program in Section 5.4. This program includes the following:

(2)(a) A list of planned transportation facilities and major improvements at Appendix 1.1 and Figures 5.4, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15 and 5.16.

(b) A general estimate of the timing for transportation facilities and major improvements at Appendix 1.1 and Figures 5.4, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15 and 5.16.

(c) A determination of rough cost estimates at Appendix 1.1.

(d) Policies to guide selection of projects for funding at Section 1.37.

(3) A discussion of existing funding mechanisms to fund each facility at Section 5.4.

**OAR 660-012-0045**

(1) Metro has amended land use regulations to implement the regional TSP in the 2000 RTP throughout the 5 year development of the 2000 RTP.

- The 1995 regional goals and objectives, acknowledged in 1996, included the 2040 Growth Concept text and map of the desired compact urban form in 2040.

- The 1997 Regional Framework Plan includes most of the transportation policies of Chapter 1 of the 2000 RTP.

- Titles 2 and 6 of the 1996 Urban Growth Management Functional Plan, incorporated into the 1997 Regional Framework Plan as Appendices, are amended in this ordinance adopting the 2000 RTP to implement the regional TSP in the 2000 RTP. Title 6 is incorporated into the 2000 RTP.

- Implementation of the regional TSP includes LCDC acknowledgement of the Regional Transportation Plan, including the 2000 RTP as the transportation component of the Plan. ORS 268.390(5) provides for further implementation based on that acknowledgment.

(2) Generally, cities and counties adopt land use and subdivision regulations to protect transportation facilities, corridors and sites for their identified functions. Metro has adopted a Land Use Final Order under special legislation to protect the South/North light rail corridor.

(3) Generally, cities and counties adopt land use and subdivision regulations to provide for safe and convenient pedestrian, bicycle, and vehicular circulation consistent with the regional bike and pedestrian plans for regional facilities.

(4) Generally, cities and counties adopt land use and subdivision regulations to support transit consistent with the regional public transportation plan for regional facilities.

(5) Generally, cities and counties adopt land use and subdivision regulations in their local TSPs consistent with this 2000 RTP (a functional plan) and the Urban Growth Management ("UGM") Functional Plan.

(a) Title 1 of UGM Functional Plan requires that city and county comprehensive plan identify of the boundaries of light rail station areas in which transit-oriented

development with mixed uses are encouraged and increased residential and commercial densities including minimum densities are required.

(b) The 2000 RTP requires that cities and counties implement a demand management program to meet the measurable standards in response to OAR 660-012-0035(4) at Section 6.4.

(c) Title 2 of the UGM Functional Plan, as amended in this ordinance adopting the 2000 RTP, requires cities and counties to implement a parking plan which accomplishes the requirements for an alternative in (5)(d) below:

(d) The regional TSP requires cities and counties to implement the following:

(A) Reduce minimum off street parking requirements for all non-residential uses from 1990 levels in Section 3.07.220 of Title 2 of the UGM Functional Plan;

(B) Allow provision of on-street parking, long term lease parking, and shared parking to meet minimum off street parking requirements in Section 3.07.220 of Title 2 of the UGM Functional Plan;

(C) Off-street parking minimums and maximums are required in all non-residential areas by Title 2 of the UGM Function Plan.

(D) Exempts structured parking and on street parking from parking maximums at Section 3.07.220 of Title 2 of the UGM Functional Plan;

(E) Require that parking lots over 3 acres provide street-like features along major driveways at Metro Code 3.07.220E of Title 2 of the UGM Functional Plan; and

(F) Provides for designation of residential parking districts defined at Section 3.07.220 of Title 2 of the UGM Functional Plan.

(6) Improvements to facilitate bicycle and pedestrian trips to meet regional travel needs in developed areas are in Fig. 5.10, 5.11, 5.12, 5.13, 5.14, 5.15, 5.16 and Appendix 1.1.

(7) Standards to minimize pavement width and total right of way consistent with the operational need of the facility are at Section 6.4.5(3)(a).

**OAR 660-012-0050 Transportation Project Development**

(2) The regional TSP provides a process for coordinated project development among affected local governments at Section 6.7. In addition, the decision record describes public

participation procedures and guidelines that Metro is expected to follow in the development of transportation plans, programs and projects at Transportation Planning Public Involvement policy (July 1995) and Transportation Planning Local Public Involvement Policy (July 1995).

**OAR 660-012-0060 Amendments to Functional Plans**

(1) The regional TSP is part of the 2000 RTP which is Metro's functional plan for transportation (See, Preface and Introduction to the 2000 RTP). The 2000 RTP contains some provisions formerly in the 1992 RTP, a functional plan, and Titles 2 and 6 of the existing Urban Growth Management Functional Plan. In addition, the 2000 RTP contains many amendments to a functional plan. However, the 2000 RTP is primarily a new plan, largely replacing previous versions of the RTP. The plan policies contained in Chapter 1 were specifically developed as a departure from previous RTPs, in an effort to fully orient the new plan to implementation of the 2040 Growth Concept. The functional maps contained in Chapter 1 represent a dramatic departure for earlier plans, and are heavily oriented toward implementation of the 2040 Growth Concept. More than half the projects and programs proposed in the 2000 RTP (and shown in Appendix 1.1) are new to the regional plan, and were generated through public workshops and comment. Of the remaining projects that were included in earlier versions of the RTP, many have been substantially revised in the 2000 RTP to reflect new conditions not anticipate in earlier plans.

Because the 2000 RTP represents such a dramatic shift in transportation policies, projects and programs for the region, no attempt was made to present the plan as an update of the 1992 RTP. Instead, the 2000 RTP provisions were drafted and presented as a new plan, with the 2040 Growth Concept serving as the foundation.

Development of the 2000 RTP followed the procedures now incorporated in Section 6.6 of the plan, including:

- Consistency with RTP policies and system maps (Section 6.6.1)
- Process established in Section 6.6.2
- Congestion management requirements (Section 6.6.3)
- Periodic update requirements (Section 6.6.4)

(1)(d) Metro has approached the balance of 2040 Growth Concept land uses with regional TSP transportation facilities by establishing a process to modify planned function, capacity and performance standards, as needed, to accept greater motor vehicle congestion in 2040 mixed use areas.

Metro established optional Level of Service standards in Title 6 of the 1996 Urban Growth Management Functional Plan. If city or county transportation facilities are significantly affected by traffic congestion from Title 1 increased land use capacities in mixed use areas, Title

6, Section 4.B and C require that a policy decision be made about whether to change the plan's "design requirement" to a level of service consistent with Section 4.B. If the functional classification and identified capacity of a transportation facility are affected by the new balance of land use and transportation using the optional level of service and other Title 6 requirements, they must be amended in the plans as part of exercising the alternate level of service option.

The greatest potential for transportation planning changes to retain consistency with new land uses is in the mixed use areas of Central City, Regional Centers, Town Centers, Main Streets and Station Communities. The greatest increases in capacity for houses and jobs are directed by Title 1, Table 1 of the UGM Functional Plan to occur in these areas. For these areas, Title 6, Section 4 establishes regional alternative performance standards. First, Section 4.A. requires alternate mode analysis to establish and implement alternative mode targets to reduce motor vehicle congestion. If a road remains out of balance with land uses, congestion analysis and management are applied. For mixed use areas, the alternative Level of Service in 4.B.1 may be applied to the road in the city or county transportation plan. If that relaxed level of service standard is exceeded, the accessibility analysis in 4.B.2 is used. If regional accessibility is impacted, the congestion management actions must be taken. Only if the road remains inconsistent with land uses are road capacity improvements planned to retain the balance between transportation facilities and land uses.

For roads outside mixed use areas, the existing regional level of service standard is required by 4.D. Congestion management actions in 4.C are used before adding roads to maintain consistency with land uses. Outside mixed use areas land use capacity is increased primarily by use of minimum densities in Title 1, Section 2 of the UGM Functional Plan. Cities and counties have flexibility in use of minimum densities that may be used to avoid some transportation impacts.

These steps to modify planned functions, capacity and performance standards to accept greater motor vehicle congestion in 2040 Growth Concept mixed use areas are retained in the 2000 RTP at Section 6.4.7. Level of Service Policy 13.0(h) and Table 1.2 contain the policy on numerical LOS standards. Section 6.4.7 expands the policy by requiring that local TSPs include the LOS standards in Table 1.2. In addition to providing alternative LOS standards to assist city and county compliance with OAR 660-012-0060 and Title 1 increases in density in centers, the policy now applies to determine congestion on all regional facilities.

Beyond the 1996 LOS policy, Table 1.2 now reflects state facilities in the regional area. The Oregon Department of Transportation serves as the transportation agency for state-owned highways in the metropolitan area, and the 1999 Oregon Highway Plan, the state TSP, establishes the acceptable standard for determining capacity on these state-owned facilities.

The 1999 Oregon Highway Plan generally establishes an E/E standard for the two-hour evening peak period for state highways. The 2000 RTP also establishes this E/E standard for most state facilities in Table 1.2. However, based on consultation with ODOT and the Oregon Transportation Commission in 1997, Metro obtained an endorsement of an interim alternative standard on radial highways that access the central city, and are within the Highway 212 and

Interstate-205 radial freeway system. These alternative level of service standards are also specific on a case-by-case basis in Table 1.2. Footnote 1 to Table 1 also establishes that these level of service standards are for interim purposes only, and shall be evaluated when corridor studies for these facilities are completed.

As part of the 1997 consultation with ODOT, the OTC also endorsed the 2040-based customized level of service standards for 2040 centers and main streets. These customized standards are shown in the first line in Table 1.2, and apply to district level state highways that are located in the Central City, Regional Centers, Town Centers, Main Streets and Station Communities, as defined in the 2040 Recommended Alternative Analysis Map. The OTC endorsement of this policy reflect consistency with the 1999 Oregon Highway Plan designation of Special Transportation Areas, where ODOT has recognized the need for a multi-modal approach to adding capacity in areas of compact, transit and pedestrian-oriented development. These customized LOS standards were adopted as an optional policy in 1996 as part of Title 6 of the UGMFP. For the interim, the regional LOS policy for these facilities has been deemed consistent with the Oregon Highway Plan by the Oregon Transportation Commission. *See,* November 11, 1997 letter to Mike Burton from Henry Hewitt, OTC Chair.

New in the 2000 RTP is the LOS standard for Areas of Special Concern in Table 1.2. Table 1.2 recognizes a new category of "Areas of Special Concern". These areas are, by definition, 2040 centers and corridors where the traditional congestion measures of level of service are inadequate for determining roadway capacity. In each of four areas identified in the 2000 RTP (Figure 1.13a through 1.13d), the specific traffic issues for the Portland Central City, Gateway Regional Center, Beaverton Regional Center and the Highway 99W corridor in the vicinity of Tigard Town Center are outlined, and a separate set of performance measures identified. Section 6.7.7 sets forth the process for developing tailored approaches for addressing traffic issues in these areas through the use of alternative standards.

In each Area of Special Concern, local TSPs must determine whether the general LOS standard is exceeded, and then identify alternative measures selecting between to two alternatives. Alternative 1 is a regulatory option that uses a combination of the following as an alternative to the general LOS standard:

(a) Adopt non-SOV targets in Table 1.3;

(b) Adopt parking ratios consistent with Title 2 of the UGMFP

(c) Adopt a street connectivity plan consistent with Section 6.4.5;

(d) Adopt a local comprehensive plan for mixed-use development, consistent with the 2040 Growth Concept.

Alternative 2 is a local performance option that requires the local jurisdiction to develop an action plan that:

(a) Anticipates the growth and subsequent impacts of motor vehicle traffic on multi-modal travel within the Area of Special Concern

(b) Establishes an action plan for mitigating the growth and subsequent impacts of motor vehicle traffic;

(c) Establishes performance standards for monitoring and implementing the action plan.

Section 6.7.7 also requires that these alternative performance measure be adopted at the time of a plan amendment that significantly affects a regional facilities, consistent with OAR 660.12.0060. Area of Special Concern measures developed as part of local TSPs shall also be incorporated into Appendix 3.6 the regional TSP as part of the next update, and become part of the regional performance standards.

The tailored freeway LOS standards in Table 1.2 that deviate from the 1999 Oregon Highway Plan standards and the Area of Special Concern alternative standards would be interim and subject to Oregon Transportation Commission review for OHP consistency. The tailored freeway LOS standards will be updated as corridor studies for the affected facilities advance, and it is anticipated that simultaneous amendments incorporating new standards will be adopted in both the regional TSP and the OHP. The Area of Special Concern alternative standards are interim, pending review and endorsement by the Oregon Transportation Commission and acknowledgement of the regional TSP. The 2040-based, customized level of service standards in Table 1.2 have already been adopted as part of Title 6 of the UGMFP, and are now being incorporated into the regional TSP.

**OAR 660-012-0065 Transportation Improvements on Rural Lands**

The 2000 RTP does not contain facilities on rural lands permitted by this rule.

**OAR 660-012-0070 Exceptions For Improvements on Rural Land**

There are findings in Attachments 1 and 2 for goals 3, 4, 11 and 14 exceptions for two facility corridors that may result in projects located outside the UGB.

i:\10.3.3.5\061600Findings.11.doc
OGC/LSS/kvw (08/03/2000 3:00 PM)

# I-5/ 99W Connector Exception Findings

## Introduction

The I-5 to 99W Connector is a proposed new four-lane, grade separated, limited-access highway that would connect Interstate 5 (I-5), south of the Tualatin town center, to Highway 99W (99W). This facility will function as a principal arterial, serving long-distance, high-speed, interstate, statewide and inter-regional travel. This facility will provide a direct link for through-travel between two major highways – Interstate 5 and Highway 99W, and will improve access on existing roads connecting the town centers of Tualatin, Sherwood, King City, Tigard and Murray/Scholls.

This document establishes findings of fact and reasons to support a need, mode, function and general location goals exception for transportation improvements on rural land as defined in OAR 660-012-0070. Portions of the general corridor boundary identified in the *Western Bypass Study Technical Report* and the entire southern corridor identified herein are located on rural lands outside of the urban growth boundary.[1] The exception will be adopted as part of the 2000 Regional Transportation Plan (RTP). This document addresses only compliance with the identified TPR standards. Compliance with other applicable statewide planning goals will be addressed separately.

## General background

### Western Bypass Study

The *Western Bypass Study* provided a comprehensive, multi-modal analysis and evaluation of alternative transportation options to address identified transportation needs in a large study area that included the urban portion of Washington County and westernmost portions of the City of Portland and Clackamas County. The study area also included portions of rural Washington County. The study was initiated in 1989 to respond to issues related to the adequacy of existing road and transit systems to serve north-south transportation needs in Washington County as identified in Metro's *1987 Southwest Corridor Study* and during the *Washington County Transportation Plan* development in 1988.

The study evaluated five alternatives that included a variety of multi-modal improvements. The best performing components to the five alternatives were blended together in the Recommended Alternative to meet the transportation needs of the study area. The *Western Bypass Study*

[1] The general corridor is divided into three segments. All three segments are located outside the Metro urban growth boundary. The eastern segment is from I-5 to Washington County Commuter rail line, between the urban growth boundary and Day Road. The middle segment is from Washington County Commuter rail line to Baker Road, between Tonquin Road and Morgan Road. The western segment is from Baker Road to 99W, between the urban growth boundary and Brookman Road. The southern corridor is primarily on exception lands south of the corridor identified in the *Western Bypass Study*.

*Recommended Alternative Report* summarizes the transportation problems within the study area and included the following recommendations:

- Construction of a new limited access expressway type facility from I-5 to 99W (the I-5 to 99W Connector)
- Deletion from further consideration of a full bypass from I-5 to Sunset Highway (US 26)
- Construction of a series of arterial and collector road improvements that include bicycle and pedestrian facilities, primarily serving north/south urban to urban travel
- Widening of Highway 217
- Implementation of transportation system management actions to improve the operation of the existing roadway system
- Implementation of transportation demand management programs such as carpooling, flexible work hours and parking management to limit demand for the existing roadway system
- Expanded transit service in the study area

The Metro Council adopted recommendations identified in the *Western Bypass Study Recommended Alternative Report* in Resolution No. 97-2497 in June 1997. The highway and arterial improvements identified in the *Western Bypass Study* were amended to the RTP Project List in the 1995 *Interim Federal Regional Transportation Plan* with an acknowledgement that these improvements would be evaluated consistent with performance measures and standards adopted in the 2000 RTP. The 2000 RTP evaluation would determine consistency with the 2040 Growth Concept and requirements contained in the State Transportation Planning Rule.

The need, function, mode and general corridor for the I-5/99W Connector were identified initially in the *Western Bypass Study Recommended Alternative Report* (Appendix A). Supporting technical information and relevant land-use findings are included in the *I-5 to 99W Connector Technical Report* (Appendix B) and the *I-5 to 99W Connector Findings of Fact and Statement of Reasons in Support of Exceptions to Goals 3, 4, 11 and 14* (Appendix C).

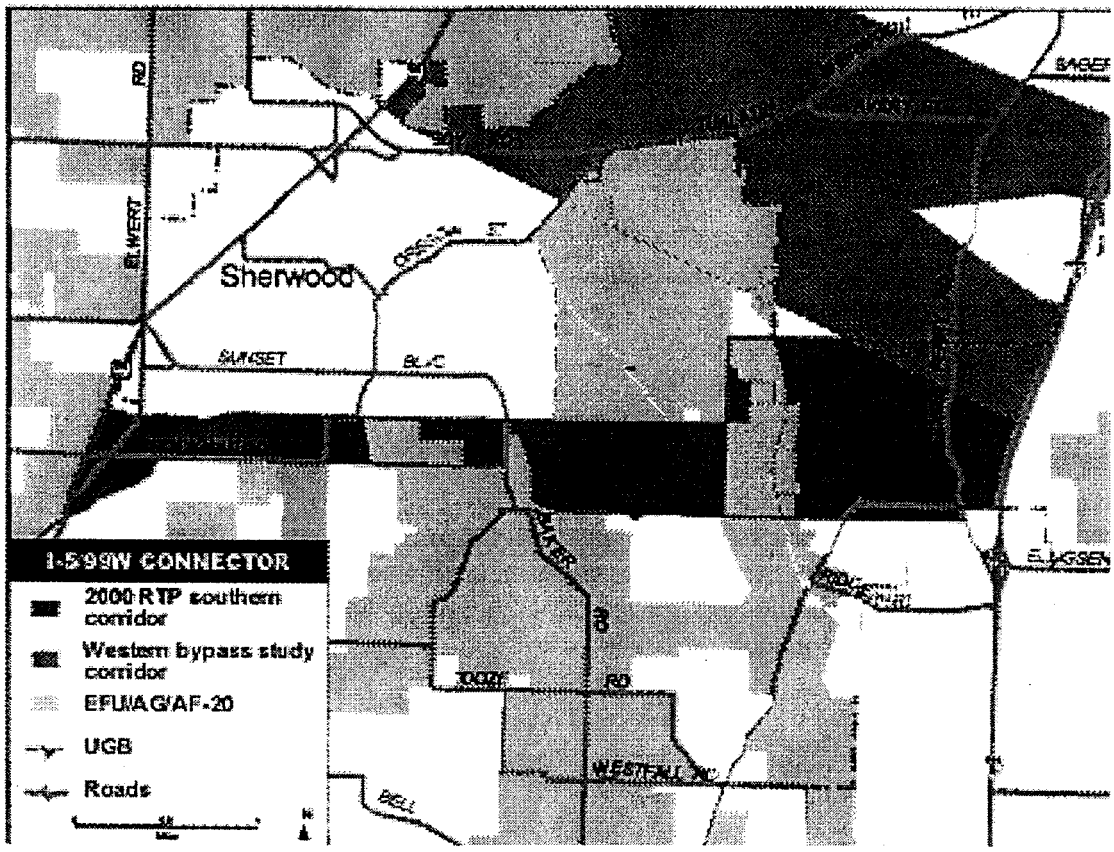
**2000 Regional Transportation Plan**

The 2000 Regional Transportation Plan reconfirms the need, mode and function of the I-5 to 99W Connector to serve a variety of trip types and purposes, including through trips of statewide significance, regional trips and local trips.[2] The general location is shown in Figure 1, which displays the general corridor identified in the *Western Bypass Study Technical Report* and the southern corridor evaluated as part of the 2000 Regional Transportation Plan (RTP). As part of the 2000 RTP analysis, the new "southern corridor" connecting I-5 to 99W south of the

[2] 1999 Regional Transportation Plan (December 16, 1999), pages 3-68 through 3-69.

Sherwood town center at approximately Middleton Road was evaluated in addition to an alignment that fell within the general corridor identified in the *Western Bypass Study Technical Report*. This southern corridor is located outside the urban growth boundary on rural lands, primarily exception lands.

*Figure 1*
**I-5/99W Connector General Location**
**(Map 2 of the I-5/99W Connector will be provided at the August 10, 2000, meeting)**




*Source: Metro*

The 2000 RTP defines a general location for the "southern corridor" to evaluate the potential for improved operation of 99W through Sherwood and reduced impacts on the existing built environment. Designation of the southern corridor boundary was guided by regional policies contained in the Regional Urban Growth Goals and Objectives (RUGGOs) and 2040 Growth Concept, acknowledged by DLCD in 1996. The southern corridor boundary was carefully chosen to avoid and/or minimize impacts to:

- agricultural and forest resource lands
- natural resources such as streams, wetlands, riparian corridors and features such as the Tonquin Scablands geologic area and the Tualatin River National Wildlife Refuge

- public facilities, regional trails, parks and open spaces
- existing development
- aggregate resource extraction activities

In addition, the corridor boundary was defined to remain close to urban growth boundary within exception lands as much as possible, to allow the corridor to serve as a future hard edge to lands outside of the current urban growth boundary designated for future growth.

The 2000 RTP does not make a final "determination" authorizing any portion of the roadway to be located outside the urban growth boundary. However, the 2000 RTP adopts the corridor studied in the *Western Bypass Study* and adopted in Ordinance No. 97-689A and adopts the "southern" corridor evaluated in the 2000 RTP. Together, these corridors are the "general location" for this transportation system improvement. The I-5 to 99W Connector is a specific corridor refinement study to proceed with an alignment decision in project development. The 2000 RTP directs the corridor refinement study to address the following design considerations to authorize a specific alignment:

- balance improvement plans with impacts on Tualatin and Sherwood town centers and adjacent rural reserves
- in addition to the northern corridor considered in the Western Bypass Study, examine the benefits of an alignment in the southern corridor, located along the southern edge of Tualatin and Sherwood, including the accompanying improvements to 99W that would be required with either corridor
- identify parallel capacity improvements to Tualatin-Sherwood Road and 99W in Tigard from I-5 to Highway 217 that could be used to phase in, and eventually complement future highway improvements
- link UGB expansion in this area to the corridor refinement study, and examine the potential for the proposed highway to serve as a "hard edge" in the ultimate urban form of the Sherwood area
- develop an access management and connectivity plan for 99W in the Tigard area that balances accessibility needs with physical and economic constraints that limit the ability to expand capacity in this area
- consider express, peak-period pricing and HOV lanes

The 2000 RTP establishes the need, mode, function and general location for the I-5 to 99W Connector. The need is for a connection from I-5 to 99W.[3] The mode is a four-lane, grade separated limited access highway. The function is a principal arterial serving long distance, higher speed interstate, statewide and interregional travel. The general location is the entire corridor shown in Figure 1.

However, in addition to more detail needed as part of project development, refinement of the general location is needed before right-of-way acquisition and construction can occur. The I-5 to 99W Connector corridor refinement study will examine the southern corridor as well as the northern corridor defined in the *Western Bypass Study*. The project development stage would include specific design details, a project location or alignment, and determination of impacts on the natural and built environment.

In summary, the need, mode, function have been identified for the I-5 to 99W Connector in the *Western Bypass Study* and adopted in the 2000 RTP. Based on a more detailed evaluation of impacts on the natural and built environment, this exception defines a general corridor for the I-5 to 99W Connector that differs from the general corridor defined in the *Western Bypass Study Technical Report*. The corridor addressed in this exception is located on rural lands outside of the urban growth boundary and will be considered along with the general corridor identified in the *Western Bypass Study Recommended Alternative Report* as part of the I-5 to 99W Connector corridor refinement study.

**Summary of relevant State Land Use Goals and administrative rules, and findings of compliance**

The following section summarizes relevant State Land Use Goals and administrative rules, which are followed by a finding of compliance.

## OAR 660-012-0070(1)

**Summary of OAR 660-012-0070(1):**

OAR 660-012-0070(1) requires an exception for siting transportation facilities on rural lands that do not meet the requirements of 660-012-0065.

**Finding of compliance with OAR 660-012-0070(1):**

The list of permitted transportation improvements in OAR 660-012-0065 does not include new four-lane limited-access highways on rural lands; therefore, OAR 660-012-0065 does not apply. Instead, the exception standards in OAR 660-012-0070 apply. The I-5 to 99W Connector satisfies OAR 660-012-0070(1) because exceptions will be taken in affected comprehensive plans consistent with the requirements of OAR 660-012-0070. The 2000 RTP requires inclusion

[3] I-5 *to 99W Connector Findings of Fact and Statement of Reasons in Support of Exceptions to Goals 3, 4, 11 and 14* (March 11, 1997), pages 10-19 are incorporated herein by reference.

of the I-5 to 99W Connector in affected comprehensive plans at Section 6.4.1, Figures 1.1 through 1.15 and Appendix 1.1 (RTP Project #6005).

## OAR 660-012-0070(2)

**Summary of OAR 660-012-0070(2):**

OAR 660-012-0070(2) requires that the exception be taken pursuant to ORS 197.732(1)(c), Goal 2, OAR 660, Division 4 and OAR 660, Division 12.

**Finding of compliance with OAR 660-012-0070(2):**

Because OAR 660-004 and OAR 660-012 implement Goal 2 and ORS 197.732(1)(c), a demonstration of compliance with these administrative rule requirements for an exception to be taken by affected cities and counties to identify the need, mode, functional and general location of the I-5 to 99W Connector demonstrates compliance with all of the review standards.[4]

## OAR 660-012-0070(3)

**Summary of OAR 660-012-0070(3):**

OAR 660-012-0070(3) concerns exceptions that are "adopted as part of a TSP or refinement plan" and requires an exception to "at a minimum, decide need, mode, function and general location for the proposed facility."

**Finding of compliance with OAR 660-012-0070(3):**

The need, mode, function and general location have been identified in accordance with OAR 660-012-0070 as adopted in Ordinance No. 97-689A. Documentation was in the *I-5 to 99W Connector Technical Report* (Appendix B) and the *I-5 to 99W Connector Findings of Fact and Statement of Reasons in Support of Exceptions to Goals 3, 4, 11 and 14* (Appendix C). This exception for the 2000 RTP, which contains the regional Transportation System Plan (TSP), identifies an additional part of the general location corridor for the I-5 to 99W Connector that is located outside the urban growth boundary and will establish why the facility cannot be reasonably be accommodated within the urban growth boundary in the general corridor identified in the *Western Bypass Study Technical Report* and the acknowledged 2040 Growth Concept.

(a) The general location of the I-5 to 99W Connector is the corridor identified at Section 6.4.1, Figures 1.1 through 1.15 and Appendix 1.1 (RTP Project #6005) and shown on Figure 1 of these findings. The general location of this corridor was evaluated in the *I-5 to 99W Connector Technical Report* (Exhibit B), except for the "southern corridor" indicated on

[4] Ibid. Pages 4-8 are incorporated by reference herein.

Figure 1 of these findings. The evaluation of that portion of the corridor is at pages 3-68 and 3-69 of the 2000 RTP based on RTP Preferred Network PM 2-hour peak level of service analysis for Rounds 1-4, PM Vehicle Volumes for Rounds 1-4 and PM 2-hour select link analysis.

(b) The size, design and capacity (mode) of the I-5 to 99W Connector is a four-lane, grade separated, limited-access highway. That is the proposed facility evaluated in the *Western Bypass Study Recommended Alternative Report* (June 1997). The measures limiting access are specified in that report's description of the proposed use.

(c) The process for selection of the precise design and location of this limited access facility will need to determine whether reasonable mitigation measures can minimize operational impacts, support planned land use, enhance compatibility with existing land uses and avoid splitting natural resource areas. The specific alignment will be determined by ODOT following preparation of a design-level (Tier II) environmental analysis in a manner consistent with federal requirements set out in the National Environmental Policy Act and implementing regulations, including public and agency involvement processes and opportunity for public comment. This process also will require ODOT to address and show compliance with all applicable local government and agency ordinances, regulations and permit requirements, including provisions for mitigation of adverse impacts. Further goals 3,11 and 14 exceptions will be needed if the location of the final alignment is outside of the UGB on any resource lands.

(d) No land use regulations implementing this goal exception could be included in the 2000 RTP. It is premature in this regional TSP to identify mitigation measures to offset environmental, economic and social or energy impacts, or to assure compatibility with adjacent uses until the final alignment is selected in the subsequent project development.

## OAR 660-012-0070(4)

**Summary of OAR 660-012-0070(4) and related ORS 197.732(1)(c)(A); Goal 2, Part II(c)(1); OAR 660-04-020(2)(a); and OAR 660-04-022:**

OAR 660-012-0070(4) requires the exception analysis to include the identification of need for the I-5 to 99W Connector that is consistent with and meets the intent of OAR 660-12-030(1). OAR 660-012-0070 (4) states:

> "To address Goal 2, Part II(c)(1), the exception shall demonstrate that there is a transportation need identified consistent with the requirements of 660-12-030 which cannot be accommodated through one or a combination of the following measures not requiring an exception:
>
> (a) alternative modes of transportation,
> (b) traffic management measures and
> (c) improvements to existing facilities."

In addition, OAR 660-12-030(1) requires that a TSP identify transportation needs relevant to the planning area and the scale of the transportation network being planned, including state, regional and local transportation needs for movement of goods and services.

**Finding of compliance with OAR 660-012-0070(4) and related ORS 197.732(1)(c)(A); Goal 2, Part II(c)(1); OAR 660-04-020(2)(a); and OAR 660-04-022:**

The transportation need for the I-5 to 99W Connector, consistent with OAR 660-012-0070(3), is described in detail in the *I-5/99W Technical Report* and in *I-5 to 99W Connector: Findings of Fact and Statement of Reasons in Support of Exceptions to Goals 3, 4, 11 and 14.*[5] In addition, the *Western Bypass Study Alternatives Analysis Report* (May 1995) describes the performance of five alternatives analyzed in the alternatives analysis and why alternative modes, TSM, TDM and improvements to existing highways and arterial streets, alone or in combination, cannot reasonably accommodate the identified transportation need. The report concludes the I-5/99W Connector is a necessary part of the transportation strategy for this part of the region.

OAR 660-012-0070(4) requires that an exception analysis include the identification of need for the I-5 to 99W Connector that is consistent with and meets the intent of OAR 660-12-030(1). The connector is consistent with OAR 660-12-030(1) because it is based on the *Western Bypass Recommended Alternative Report* and the 2000 RTP, both of which considered and identified transportation needs relevant to the study area and the scale of the transportation network being planned. The 2000 RTP contains the regional TSP.

To summarize, the I-5 to 99W connector would serve regional and state transportation needs, moving people and goods between communities within the Portland metropolitan region as well as through the region or to other destinations in or outside the state. A limited-access facility is warranted to preserve the function of the roadway to facilitate regional and inter-regional trips.

## OAR 660-012-0070(5)

**Summary of OAR 660-012-0070(5) and related ORS 197.732(1)(c)(B); Goal 2, Part II(c)(2); and OAR 660-04-020(2)(b):**

OAR 660-012-0070(5) provides that to address Goal 2, Part II(c)(2), the exception must demonstrate that non-exception locations cannot reasonably accommodate the proposed transportation improvement or facility. Similarly, OAR 660-04-020(2)(b) requires justification why "areas which do not require a new exception cannot reasonably accommodate the use."

---

[5] *Appendix C: I-5 to 99W Connector Findings of Fact and Statement of Reasons in Support of Exceptions to Goals 3, 4, 11 and 14,* pages 10-22 are incorporated by reference herein.

**Finding of compliance with OAR 660-012-0070(5) and related ORS 197.732(1)(c)(B); Goal 2, Part II(c)(2); and OAR 660-04-020(2)(b):**

It is premature to address OAR 660-012-0070(5) and 660-04-020(b) at this time. The action taken here merely establishes a general location corridor within which the proposed facility is to be located after project development actions. Locating the I-5 to 99W Connector entirely inside the UGB could potentially result in unreasonable adverse impacts that would justify a location outside the UGB. Therefore, this general corridor includes some lands located outside the UGB. However, including those rural lands in the "general location" decision does not, in itself, authorize construction of this facility on those lands. For that to happen, a second exception must be taken demonstrating why the facility cannot reasonably be located entirely within the UGB. Insufficient evidence is available to conclude one way or the other until project actions are completed.

## OAR 660-012-0070(6)

**Summary of OAR 660-012-0070(6):**

OAR 660-012-0070(6) requires the exception to justify the thresholds chosen to judge whether an alternative method or location identified under OAR 660-012-0070(4) or (5) cannot reasonably accommodate the proposed transportation need or facility. These thresholds include transportation need, cost, operational feasibility, economic dislocation and other relevant factors such as impacts on planned urban growth patterns and ability to achieve VMT objectives.

**Finding of compliance with OAR 660-012-0070(6):**

The most relevant thresholds for the I-5 to 99W Connector are the nature of the transportation need, operational feasibility and impacts on planned urban growth patterns.

- **Transportation Need and Operational Feasibility**
  As noted in the I-5 to 99W Connector Findings, related Technical Report and the *2000 RTP*, the proposed principal arterial connection is intended to and would serve predominately state and regional transportation needs.[6] In this capacity, moving people and goods between communities within the Portland metropolitan region as well as through the region or to other destinations in or outside the state. These needs cannot be reasonably met through alternative modes of transportation, including significantly expanded transit service, demand management or through facilities serving local needs.[7]

  The *Western Bypass Study Recommended Alternative* includes significant transit service expansion, Similarly, improvements to existing roadways beyond those contained in the

[6] I-5 to 99W Technical Report, March 11, 1997, pages 43-44 are incorporated by reference herein.
[7] Ibid, pages 20-21.

*Western Bypass Study Recommended Alternative* would not eliminate the state and regional needs for this facility or meet the operational objectives of providing a facility designed

- **Impacts on Planned Urban Growth Patterns**
  Acknowledged by DLCD in 1996, the 2040 Growth Concept includes the I-5 to 99W Connector within the urban growth boundary. Existing development patterns in the study area within the urban growth boundary are significant constraints in this corridor and would impact Metro's ability to implement the land use and transportation strategy adopted in the 2040 Growth Concept. The 2040 Growth Concept focuses new jobs and housing in communities such as downtown Tigard, Tualatin and Sherwood and along major transit corridors such as 99W. While the need for the I-5 to 99W Connector has been established to serve trips to these communities and destinations outside of the region, the resulting transportation system must be compatible with and cannot undermine implementation of the 2040 Growth Concept vision in these communities.

  The *2000 RTP* at page 3-68 found a northern corridor of the connector as adopted in the 2040 Growth Concept and Western Bypass Study recommendations caused significant congestion on 99W in Sherwood despite major improvements to 99W. Severe access management, frontage road and intersection improvements along 99W in Sherwood were modeled in conjunction with the northern corridor. However, these strategies did not fully address congestion on 99W and could impact development of the Sherwood town center. In contrast, the *2000 RTP,* at pages 3-68 through 3-69, found that a southern corridor connecting to 99W just south of Sherwood would not only negate difficult and costly access control measures along 99W in Sherwood, this corridor might also prove more attractive for through-trips, given the higher traffic volumes experienced on the southern corridor.

  The Western Bypass Study prepared an *Alternatives Analysis Report* (May 1995) that attempted to quantify the impacts for an alignment within the urban growth boundary. That document analyzed impacts for all the individual improvements in each of the five alternatives were analyzed. The analysis demonstrated that impacts for an alignment within the urban growth boundary could be significant.[8] The number of affected parcels has grown from this initial analysis.

## OAR 660-012-0070(7) and (8)

**Summary of OAR 660-012-0070(7) and (8) and related ORS 197.732(1)(c)(C) and (D); Goal 2, Part II(c)(3) and (4); and OAR 660-04-020(2)(c) and (d):**

OAR 660-012-0070(7) provides that to comply with Goal 2, Part II(c)(3), the exception must compare the economic, social, environmental and energy consequences of the proposed location with other locations requiring exceptions. The exception must discuss "whether the net adverse impacts associated with the proposed exception site are significantly more adverse than the net

[8] Appendix A: *WBS Recommended Alternative Report*, June 1996, pages 34-39.

impacts from other locations which would also require an exception." The proposed exception would fail only if the impacts associated with it are "significantly more adverse" than the other identified exception sites. The evaluation of consequences may be generalized rather than site-specific.

OAR 660-012-0070(8) provides that comply with Goal 2, Part II(c)(4), the exception must describe the adverse effects that the proposed transportation improvement is likely to have on the surrounding rural lands and land uses, including increased traffic and pressure on nonfarm or highway-oriented development on areas made more accessible by the transportation improvement. This section also requires, as part of the exception, facility design and land use measures which minimize accessibility of rural lands from the proposed transportation facility and support continued rural use of surrounding lands.

OAR 660-04-020(2)(c) is similar to OAR 660-012-0070(7). It requires a general description of the character of each alternative area and discussion of the advantages and disadvantages of the various alternatives, including positive and negative consequences. Like OAR 660-012-0070 (7), the exception must explain why the use at the chosen site is not "significantly more adverse" than would typically result from the same proposal being located at one of the exception sites. Considerations include which resource lands are most productive; the ability to sustain resource uses near the proposed use and long-term economic impact on general area resulting from removal of land from the resource base.

Similarly, OAR 660-04-020(2)(d) requires the exception to explain how the proposed use is compatible with other adjacent uses or will be rendered compatible through measures designated to reduce adverse impacts. "Compatible" is not intended to mean no interference or adverse impacts of any type with adjacent uses. The proposed transportation improvement must be determined to either be compatible with the existing uses or can be rendered compatible through measures designed to reduce adverse impacts.

**Finding of compliance with OAR 660-012-0070(7) and (8) and related ORS 197.732(1)(c)(C) and (D); Goal 2, Part II(c)(3) and (4); and OAR 660-04-020(2)(c) and (d):**

Final determination of a specific alignment is deferred to further study in Section 6.7.5 in Chapter 6 of the 2000 RTP. Because no specific alignment is proposed at this time, it is premature to address these exception standards. If project development results in an alignment outside the UGB, a further exception applying these standards will be required.

A preliminary analysis of the southern corridor shows the following potential adverse impacts of the limited access expressway, depending on the alignment chosen as part of the project development stage:

- **Agricultural and Forest Lands**
  The southern corridor could have direct impacts on agricultural or forest lands, designated EFU, EFC, AGF or AF-20, depending on the alignment chosen for the limited access expressway as part of the project development stage. Three parcels designated as EFU lands are located within the southern corridor. Some of the parcels have residential development

and related improvements. Indirect impacts could range from the loss of crop income from the local economy to the disruption of farming activities such as crop spraying and harvesting.

The predominate uses in the area located in the eastern section of the southern corridor, between the City of Tualatin and the City of Wilsonville, are rural residential, rural industrial and limited agricultural uses. The new State of Oregon Women's Correctional facility is located in this section of the corridor. A sand and gravel mining operation is located in the northwest portion of this section of the corridor. Based on the limited agricultural activities taking place in this part of the corridor and to the south, there would be limited impacts to farm uses.

The middle section of the southern corridor is surrounded by the City of Sherwood and the City of Tualatin on three sides and contains very little agricultural activity, with the exception being some orchards within the rural residential portion of the area. The northern part of this section is occupied by a sand and gravel operation. The exception lands located to the south have a mixture of rural residential uses and field crop and orchard production. Based on the limited agricultural activities taking place in this part of the corridor and to the south, there would be limited impacts to farm uses.

The western section of the corridor is located adjacent to the City of Sherwood and contains some EFU land that is completely surrounded by exception land. The exception lands in these areas are predominately in rural residential, field crop or small nursery uses. Potential agricultural impacts would be on EFU land located to the south and west. EFU land to the south contains nurseries, orchards and row crops. This land has also been split by a number of exception areas. Highway 99W forms a buffer from EFU lands to the west.

- **Natural resources**
  Natural resources could be affected by an alignment within the southern corridor due to potential fragmentation or alteration of wildlife habitat, loss of riparian areas, alteration of wetlands, stormwater runoff and stream or floodplain crossings, depending on the alignment chosen for the limited access expressway at the project development stage.

  The eastern section of the corridor is generally sparsely covered with trees. Coffee Lake Creek and Rock Creek run through the middle section of the corridor. Both creeks have a floodplain located along the bank of these streams. A southern alignment could have direct impacts on the geologic feature known as the Tonquin Scablands Geologic Area, which includes protected mineral and aggregate resource areas, in the middle section of the southern corridor. Most of the wetlands within the corridor are located within the Tonquin Scablands Geologic Area, south of Tonquin Road in the middle section of the corridor, along perennial streams and along some drainages and intermittent streams. Goose Creek and Cedar Creek are located in the western section of the southern corridor. Both creeks have a floodplain located along the bank of these streams.

## Conclusion

For all of the reasons listed above, including the 1997 findings incorporated by reference, compliance with all currently applicable TPR provisions has been demonstrated. These findings support inclusion of the I-5 to 99W Connector in the 2000 RTP, including compliance with OAR 660-012-0070 and related goals for the potential alignment of this facility on rural lands.

# Sunrise Corridor Exception Findings

## Introduction

The Sunrise Corridor is a proposed highway improvement on Oregon 212/224, between Interstate 205 and US 26. A *Sunrise Corridor Draft Environmental Impact Statement* (DEIS) was prepared in 1993, and advances two alternatives for addressing the travel need in this corridor. The "existing highway" alternative simply expands the existing two-lane highway facility, adding two additional lanes capacity to the existing right-of-way.

A second "new alignment" alternative follows the general corridor of the existing highway, adding a total of four lanes of new capacity, while retaining the existing route as a parallel arterial street. The "new alignment" alternative also includes additional right-of-way for two additional lanes beyond the four-lane configuration that was examined in the DEIS. The "new alignment" option also has two routing options in the portion of the corridor that is currently outside the metropolitan urban growth boundary (UGB).

The Sunrise Corridor improvement was incorporated into the *Region 2040 Growth Concept* in 1995 as a conceptual improvement to Highway 212 to maintain freight mobility and regional access from Clackamas County to the US 26 Corridor, which links the metropolitan area to central and eastern Oregon. The 2040 Growth Concept was acknowledged by the Land Conservation and Development Commission (LCDC) in 1996. The existing Oregon 213/224 highway is included in the 1999 Oregon Highway Plan as a statewide highway, and is also part of the National Highway System.

Both Sunrise DEIS alignments include interchanges in the Damascus and Boring areas. Since the DEIS was drafted in 1993, Metro has added new lands in the vicinity of the Sunrise Corridor to the urban area, and future UGB expansion is likely to occur on exception lands along the corridor. To anticipate urban expansion here, Metro has initiated a master-planning project for the Damascus and Pleasant Valley areas, primarily funded through the Federal Highway Administration TCSP program. The Oregon Department of Land Conservation and Development has awarded a similar grant to Clackamas County through the TGM program to examine opportunities for urbanization in this area, with an emphasis on improving the job/housing imbalance that exists in Clackamas County, and is expected to place a heavy commuting burden on highway connections to and from this part of the region.

While the acknowledgement of the 2040 Growth Concept and Concept Map already establishes that this proposed highway improvement is consistent with statewide planning goals, this document establishes additional findings of fact that address the goal exception requirements in OAR 660-012-0070 for these portions of this corridor located outside the UGB. Much of the general corridor addressed in this document is located on

rural lands outside of the urban growth boundary.[1] The additional exception findings will be adopted as part of the 2000 Regional Transportation Plan (RTP), which contains the regional transportation system plan (TSP). This document addresses only compliance with the identified TPR standards. Compliance with other applicable statewide planning goals is addressed in a separate findings document.

## General background

### Purpose and Need for the Project

The proposed Sunrise Corridor highway improvement is an expansion of the existing Highway 212/224 route. At the time of the DEIS, this route served between 10,000 and 50,000 vehicles daily, with more than one third of these as "through" trips[2]. The travel corridor is the primary connection between US 26 and Interstate 205 in Clackamas County. It serves the needs of local commuters, local commerce and inter-regional traffic, including freight. In addition, it connects the region to recreational areas at Mt. Hood and in Central Oregon. These areas attract a large number of visitors throughout the year. Though overall traffic in the corridor drops slightly on the weekends, the percentage of vehicles destined for Mount Hood or points beyond climbs from 25% on weekdays to 45% on weekends.

A portion of the rural area in the corridor is also expected to urbanize in the future. Currently, the UGB is located just east of the Rock Creek junction of Highways 212 and 224. However, the acknowledged 2040 Growth Concept includes town centers at Damascus and Pleasant Valley, and employment land along Highway 212. The Metro Council took action toward this vision by expanding the UGB to incorporate Pleasant Valley and areas along Sunnyside Road two years ago. A concept plan to guide future urban expansions in this area is being developed by Metro, Clackamas County and the Cities of Portland and Gresham, and a coordinated effort by Clackamas County will also examine the potential for designating new employment areas along the Sunrise Corridor. Consistent with the acknowledged 2040 Growth Concept, the Sunrise Corridor highway improvement is assumed in each of these studies as the backbone of future urban infrastructure.

While future urbanization will further drive the need for a major transportation improvement in this corridor, existing demand already establishes the need. The Sunrise DEIS concluded that the project was needed to efficiently accommodate existing and future traffic. The project was originally intended to meet the goals of the Access Oregon Highway (AOC) program by connecting economic centers in the state (in this case, Southeast Portland/Clackamas, Mt. Hood and Central Oregon), improving travel time,

---

[1] The general corridor is divided into two units. Unit 1 stretches from Interstate 205 to Rock Creek, and includes only a "new alignment" alternative that retains the existing Highway 212/224 as a local arterial route; Unit 2 extends from Rock Creek to US 26. This unit includes both an "existing alignment" and "new alignment" alternative. The "new alignment" contains two further options in the Damascus area, one bypassing Damascus to the north, and one to the south. One "new alignment" option exists to the east of 222nd Avenue.

[2] These data are from the Sunrise DEIS, and have not been updated from the 1992 traffic counts that were used in the DEIS. Current volumes are presumed to exceed these levels.

improving capacity and improving safety conditions. The project is also included in the *1999 Oregon Highway Plan* as a statewide highway, and is also part of the National Highway System.

Based on the DEIS, and the critical function that the existing Highway 212/224 connection currently plays in this part of the region, Metro included the Sunrise Corridor highway improvement in the *2000 Regional Transportation Plan* (RTP) as a critical element of the RTP "strategic system". This system consists of the region's most critical transportation improvements, and serves as the region's definition of an "adequate" system for the purpose of the state TPR. The RTP systems analysis concluded that the Sunrise improvement was necessary to maintain an operable roadway system in a rapidly growing Pleasant Valley/Damascus area[3]. The RTP also includes major transit improvements in the Pleasant Valley/Damascus area that augment the development of the Sunrise improvement and a network of arterial and collector streets, with implementation first in the Pleasant Valley area that has already been included in the UGB, and as urbanization occurs in other exception areas over the course of the 20-year plan period. The RTP envisions a gradual phasing of the project to discourage urbanization pressures in areas outside the UGB. The development of the Damascus town center will be linked to construction of the Sunrise improvements, with through traffic routed around the town center on the new facility only after the town center has developed to an adequate size, and the presence of through-traffic no longer benefits the economic viability of the center.

**Sunrise Corridor Draft Environmental Impact Study**
The *Sunrise DEIS* provides a comprehensive, multi-modal analysis and evaluation of alternative transportation options to address identified transportation needs in the Highway 212/224 corridor. An evaluation of four alternatives included:

- several highway alignments
- transit alternative
- transportation demand management (TDM) alternative
- transportation system management (TSM) alternative

The *Sunrise DEIS* summarizes the transportation problems within the study area and included the following conclusions:

- population and employment growth in the areas have been steadily increasing, and are expected to increase sharply with future expansion of the UGB
- significant rural residential development has occurred throughout the corridor, and more is planned, requiring additional access
- Mt. Hood and Central Oregon have become increasingly popular as tourist and recreational destinations, with the Sunrise Corridor providing one of two key connections between these areas and the metropolitan area

[3] The RTP systems analysis is highlighted in Chapters 3 and 5 of the 2000 RTP, and summary information on performance measures is included in Appendix 1.0 and the *2000 RTP Level Service* maps.

- the corridor's economic and population growth, increasing number of access to Highway 224 and 212, and overall traffic growth have combined to crease safety and roadway deficiency problems that contribute to high accident rates in some sections of the existing highway
- the indirect connection between the Milwaukie Expressway (Oregon 224) and the Clackamas Highway (Oregon 212/224) creates congestion and safety problems
- if no action is taken in this corridor, nearly all of the signalized intersections in the corridor would be over capacity by 2015

The Metro Council and JPACT have not adopted recommendations identified in the *Sunrise DEIS*, except though adoption of the *1995 Interim Federal Regional Transportation Plan*. The highway and arterial improvements identified in the *Sunrise DEIS* were included in the *1995 Interim Federal RTP* project list with an understanding that these improvements would be evaluated consistent with performance measures and standards adopted in the 2000 RTP. The Clackamas County Commission approved a "preferred alternative" in 1996, after the *Sunrise DEIS* was prepared. A final DEIS was proposed for completion in 1998, but no funding for project construction has been allocated.

In 1998, ODOT completed a final findings report for the Sunrise Corridor under the Major Investment Study (MIS) provisions of the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). Under the new metropolitan planning rules promulgated by the Federal Highway Administration (FHWA) in response to ISTEA, a major investment study must be completed for major highway or transit improvements of substantial cost. The new MIS provisions are also applicable to those projects, like the Sunrise, for which the environmental review process has been initiated, but no record of decision or finding of no significant impact has been filed. The Sunrise MIS findings process included formal consultation with affected agencies, and re-established the purpose and need for the Sunrise Corridor project.

The need, function, mode and general corridor for the I-5/99W Connector were identified initially in the *Sunrise DEIS*. Additional technical information is included in the *Sunrise Corridor: Final Findings Report for the Major Investment Study Consultation*, complete by ODOT in 1998.

**2000 Regional Transportation Plan**

The 2000 Regional Transportation Plan reconfirms the need, mode and function of the Sunrise Corridor highway improvement to serve a variety of trip types and purposes, including through trips of statewide significance, regional trips and local trips. As part of the RTP analysis, the "southern alignment" option of the new alignment alternative were modeled, and interchange access points were modified in light of new policies governing urbanization in the Damascus area. However, portions of the southern option of the new alignment alternative continue to be located in rural lands outside the Damascus area, where urbanization is not expected to occur in the foreseeable future.

The 2000 RTP does not make a final "determination" authorizing any portion of the roadway to be located outside the urban growth boundary. Instead, the *2000 RTP* requires that additional project development work be completed for the Sunrise Corridor, with specific design considerations outlined in the plan. This designation indicates that need, mode, function and general location have been established for the corridor, but that further work is needed to identify a specific alignment. The 2000 RTP concludes that the full Sunrise Corridor improvement from I-205 to Highway 26 is needed during the 20-year plan period. However, it should be implemented with a design and phasing that reinforces development of the Damascus town center, and protects rural reserves from the effects of urban traffic. Though a draft environmental impact statement has been prepared for this corridor, the RTP requires that the final environmental impact statement consider the following design elements:

- construct the segment from I-205/Highway 224 interchange to existing Highway 212 at Rock Creek as funds become available
- preserve right-of-way (ROW) from Rock Creek to Highway 26 as funds become available
- consider phasing Sunrise construction as follows: (a) complete I-205 to Rock Creek segment first, followed by (b) ROW acquisition of remaining segments, then (c) construction of 222nd Avenue to Highway 26 segment and (d) lastly, construction of middle segment from Rock Creek to 222nd Avenue as Damascus town center develops
- consider express, peak period pricing and HOV lanes as phases of the Sunrise Corridor are constructed
- reflect planned network of streets in Damascus/Pleasant Valley area in refined interchange locations along the Sunrise Route, including a connection at 172nd Avenue, the proposed major north/south route in the area
- implement bus service in parallel corridor from Damascus to Clackamas regional center via Sunnyside Road
- avoid premature construction that could unintentionally increase urban pressures in rural reserves east of Damascus
- examine the potential for the highway to serve as a "hard edge" in the ultimate urban form of the Damascus area
- develop a concurrent plan to transition the function of the existing Highway 212 facility into a major arterial function, with appropriate access management and intersection treatments identified

Section 6.7.5 of the *2000 RTP* recognizes that the need, mode, function and general location for the Sunrise Corridor highway improvement have been established. However, more detail is needed as part of project development phase before construction can occur. The project development stage would include specific design details, project location or alignment, access points and determination of impacts on the natural and built environment.

In summary, the need, mode, function and general location have been established for the *Sunrise Corridor DEIS* and the general location in the 2000 RTP. The corridor has been acknowledged in the 2040 Growth Concept as consistent with statewide planning goals. In the alternative, if the portions of the general location of the Sunrise Corridor outside the UGB are not acknowledged, this exception establishes supporting findings for the portion of the Sunrise Corridor located on rural lands outside of the urban growth boundary.

## Summary of Relevant State Land Use Goals and Administrative Rules, and Findings of Compliance

### OAR 660-012-0070(1)

**Summary of OAR 660-012-0070(1):**

OAR 660-012-0070(1) requires an exception for siting transportation facilities on rural lands that do not meet the requirements of 660-012-0065.

**Finding of compliance with OAR 660-012-0070(1):**

The list of permitted transportation improvements does not include new four-lane limited-access highways on rural lands; therefore, OAR 660-012-0065 does not apply. Instead, the exceptions standards in OAR 660-012-0070 apply. The Sunrise Corridor satisfies OAR 660-012-0070(1) because an exception will be taken consistent with the requirements of OAR 660-012-0070.

### OAR 660-012-0070(2)

**Summary of OAR 660-012-0070(2):**

OAR 660-012-0070(2) requires that the exception be taken pursuant to ORS 197.732(1)(c), Goal 2, OAR 660, Division 4 and OAR 660, Division 12.

**Finding of compliance with OAR 660-012-0070(2):**

Because OAR 660-04 and OAR 660-012 implement Goal 2 and ORS 197.732(1)(c), a demonstration of compliance with these administrative rule requirements demonstrates compliance with all of the review standards set forth in statutes.

## OAR 660-012-0070(3)

**Summary of OAR 660-012-0070(3):**

OAR 660-012-0070(3) concerns exceptions that are "adopted as part of a TSP or refinement plan" and requires an exception to "at a minimum, decide need, mode, function and general location for the proposed facility."

**Finding of compliance with OAR 660-012-0070(3):**

The need, mode, function and general location have been identified in accordance with OAR 660-012-0070 as documented in the 1993 *Sunrise Corridor DEIS* and 1998 Sunrise MIS Final Findings Report. The need, mode, function and general location of the Sunrise Corridor are also identified in the 2000 Regional Transportation Plan, which serves as the regional TSP for the Portland metropolitan area.

The need for the Sunrise Corridor highway improvement is to accommodate planned growth in the area and eliminate safety problems on the existing Highway 212 *(See, p of the Sunrise DEIS)*. The function of this highway improvement is to connect the southeast portion of the Portland metropolitan area with points east on the Highway 26 corridor, including neighboring cities in Clackamas County, the Mt. Hood recreation areas and Central Oregon, consistent with the 1999 Oregon Highway Plan. *(See, p of the Sunrise DEIS)*

(a) The general location of the Sunrise Corridor is identified at Section 6.4.1, Figures 1.1 through 1.15 and Appendix 1.1 of the *2000 RTP*, and shown on Figure 1 of these findings. The general location of this corridor was evaluated in four rounds of RTP modeling, and is documented in both Appendix 1.0 and on the *2000 RTP* Level of Service maps. The evaluation of the corridor is summarized in Section 3.4.4 (preferred system) and Section 5.3.3 (priority system) of the 2000 RTP, based on 2-hour peak level of service analysis, PM vehicle volumes and select link analysis for Rounds 1-4 of RTP modeling,.

(b) The conceptual size, design and capacity (mode) of the Sunrise Corridor highway improvement is assumed to be a four-lane, limited access, divided highway in the four rounds of *2000 RTP* modeling and analysis, and in the project list shown in Appendix 1.1. These size, design and capacity assumptions are consistent with southern new alignment option in the Sunrise DEIS, although some interchange configurations are slightly modified, based on updated plans for urbanization in the Damascus area in the 2040 Growth Concept.

(c) The process for selection of the precise decision and location of this facility in project development is set forth in Section 6.7.3, 6.7.4 and applicable portions of 6.7.5 that relate to the Sunrise Corridor. The standards for selection of the precise design and location include federal ("NEPA") final environmental impact statement rules,

applicable statewide land use goals and regional goals, including the 2040 Growth Concept. Further goals 3, 11 and 14 exceptions will be needed if the location of the final alignment is outside the UGB.

(d) No land use regulations implementing this goal exception could be included in this regional TSP to identify mitigation measures to offset environmental, economic and social or energy impacts, or to assure compatibility with adjacent uses until the final alignment is selected in subsequent project development.

## OAR 660-012-0070(4)

**Summary of OAR 660-012-0070(4) and related ORS 197.732(1)(c)(A); Goal 2, Part II(c)(1); OAR 660-04-020(2)(a); and OAR 660-04-022:**

OAR 660-012-0070(4) requires the exception analysis to include the identification of need for the Sunrise Corridor that is consistent with and meets the intent of OAR 660-012-0030(1). OAR 660-012-0070 (4) states:

"To address Goal 2, Part II(c)(1), the exception shall demonstrate that there is a transportation need identified consistent with the requirements of 660-012-0030 which cannot be accommodated through one or a combination of the following measures not requiring an exception:

(a) alternative modes of transportation,
(b) traffic management measures and
(c) improvements to existing facilities."

In addition, OAR 660-012-0030(1) requires that a TSP identify transportation needs relevant to the planning area and the scale of the transportation network being planned, including state, regional and local transportation needs for movement of goods and services.

**Finding of compliance with OAR 660-012-0070(4) and related ORS 197.732(1)(c)(A); Goal 2, Part II(c)(1); OAR 660-004-0020(2)(a); and OAR 660-04-022:**

The transportation need for the Sunrise Corridor improvement, consistent with OAR 660-012-0070(3), is described in detail in the 1993 *Sunrise Corridor DEIS* and 1998 Sunrise MIS Final Findings Report. The *Sunrise Corridor DEIS* describes the performance of several alternatives with three general alignments, and why alternative modes, TSM, TDM and improvements to existing highways and arterial streets, alone or in combination, cannot reasonably accommodate the identified transportation need. The *Sunrise DEIS* concludes that a new highway facility is a necessary part of the transportation strategy for this part of the region. These findings are echoed in the Sunrise MIS Final Findings Report.

OAR 660-012-0070(4) requires that an exception analysis include the identification of need for the Sunrise Corridor improvement that is consistent with and meets the intent of OAR 660-012-0030(1). The Sunrise improvement is consistent with OAR 660-012-0030(1) because it is based on the *Sunrise DEIS,* the Sunrise MIS Final Findings Report and the *2000 RTP*, each of which considered and identified transportation needs relevant to the study area and the scale of the transportation network being planned.

To summarize, the Sunrise Corridor improvement would serve regional and state transportation needs, moving people and goods between the Portland metropolitan region and points east along the Highway 212 and 26 corridors, the Mount Hood recreation areas and central and eastern Oregon. A limited-access facility is warranted to preserve the function of the roadway to facilitate regional and inter-regional trips.

## OAR 660-012-0070(5)

**Summary of OAR 660-012-0070(5) and related ORS 197.732(1)(c)(B); Goal 2, Part II(c)(2); and OAR 660-004-0020(2)(b):**

OAR 660-012-0070(5) provides that to address Goal 2, Part II(c)(2), the exception must demonstrate that non-exception locations cannot reasonably accommodate the proposed transportation improvement or facility. Similarly, OAR 660-004-0020(2)(b) requires justification why "areas which do not require a new exception cannot reasonably accommodate the use."

**Finding of compliance with OAR 660-012-0070(5) and related ORS 197.732(1)(c)(B); Goal 2, Part II(c)(2); and OAR 660-004-0020(2)(b):**

Acknowledged by DLCD in 1996, the 2040 Growth Concept includes the Sunrise Corridor highway connection between Interstate 205 and Highway 26, following the Highway 212 corridor. The corridor is generally characterized by exception lands, which resulted in much of the area being designated "urban reserve" in the 2040 Growth Concept. While the "urban reserve" designation was invalidated in a recent UGB decision, the area along the Sunrise Corridor continues to be a primary candidate for urbanization from I-205 to 122nd Avenue.

During the past thirty years, much of the rural land in the vicinity of Highway 212 was partitioned into relatively small parcels of one to five acres, and developed with single family homes. As a result, the rural zoning in this area is a patchwork of resource and exception lands. The rural land uses are further compromised by commercial development in the Damascus and Boring districts. The remaining resource lands in the area that are adjacent to the existing Highway 212 can be grouped according to continguous parcels, as follows:

1. **Group 1** (near 152nd Avenue) - this group includes [4-7] parcels, for a total of [blank] acres. Several of the parcels are small, and developed with rural residential uses.
2. **Group 2** (near 222nd) - this group includes 6 parcels, for a total of [blank] acres. Some of these parcels are used for agriculture.
3. **Group 3** (near 232nd Avenue) - this group includes [4-11] parcels, for a total of [blank] acres. Some of these parcels are used for agriculture.
4. **Group 4** (west of Boring) - this group includes 8 parcels, for a total of [blank] acres. Some of these parcels are used for agriculture.
5. **Group 5** (east of Boring) - this group includes 7 parcels, for a total of [blank] acres. Some of these parcels are used for agriculture.

Figure 1 shows the location of these resource lands.

**Figure 1**
**Sunrise Corridor Resource Lands Map**

**(This map will be available at the August 10th JPACT meeting.)**

A Sunrise Corridor improvement along the existing Highway 212 route would benefit from using existing right-of-way that is already developed for transportation use. However, additional right-of-way would be needed to improve the facility to a proposed four lanes, and thus resource lands along both sides of the existing route would be impacted. The existing right-of-way ranges from 80 to 100 feet in width. A four-lane

facility could be expected to range from 120 to 160 feet in width, requiring 20-50 feet of additional right-of-way on either side of the existing alignment.

Because the draft *Sunrise DEIS* included an existing alignment alternative, these exception findings are limited to that alternative. The *2000 Regional Transportation Plan* analysis does not support a particular alignment, since only a conceptual connection between Interstate-205 and Highway 26 was modeled. While the southern alignment is portrayed on the RTP system maps as a conceptual route, the plan specifically states in Section 6.7.5 that a Sunrise Corridor refinement plan is required, and should be accomplished through a final environmental impact statement. Therefore, further exception findings would be required upon completion of a final Sunrise environmental impact statement, should an alignment other than the existing Highway 212 route be selected. These additional findings would address why "areas which do not require a new exception cannot reasonably accommodate the use," as required by OAR 660-012-0070(5).

## OAR 660-012-0070(6)

**Summary of OAR 660-012-0070(6):**

OAR 660-012-0070(6) requires the exception to justify the thresholds chosen to judge whether an alternative method or location identified under OAR 660-012-0070(4) or (5) cannot reasonably accommodate the proposed transportation need or facility. These thresholds include transportation need, cost, operational feasibility, economic dislocation and other relevant factors such as impacts on planned urban growth patterns and ability to achieve VMT objectives.

**Finding of compliance with OAR 660-012-0070(6):**

The most relevant thresholds for the Sunrise Corridor improvement are the nature of the transportation need, operational feasibility and impacts on planned urban growth patterns.

- **Transportation Need and Operational Feasibility**
  As noted in the *Sunrise DEIS,* the Sunrise MIS Final Findings Report and the *2000 RTP*, the proposed principal arterial connection is needed to serve state and regional transportation needs. The existing Highway 212 serves a combination of statewide travel, regional travel and local trips. The *Sunrise DEIS* and the *2000 RTP* demonstrate that these needs cannot be reasonably met through solely through alternative modes of transportation, including significantly expanded transit service, demand management or through facilities serving local needs. However, these transportation alternatives are needed in conjunction with the Sunrise Corridor improvement, and are included in the *2000 RTP*. These complementary improvements would include Frequent Bus service on Sunnyside Road and Regional Bus on most major routes in the corridor.

- **Impacts on Planned Urban Growth Patterns**
  The Sunrise Corridor improvement is also closely linked to the development of the land use components off urban Clackamas County in the 2040 Growth Concept. The improvement is the freight backbone of the Clackamas industrial corridor, and the growth concept and *2000 Regional Transportation Plan* link the phasing of the Sunrise improvements to the gradual development of the Damascus town center and adjacent employment areas, as follows:
  1. Completion of the I-205 to Rock Creek Junction segment in the short term, to immediately improve freight mobility through this heavily congested portion of the Highway 212 corridor.
  2. Acquire right-of-way for the remainder of the Sunrise improvement prior to urbanization, with consideration given to using the Sunrise as a "hard edge" to future urbanization in the Clackamas area.
  3. Completion of the 222nd to Highway 26 segment in the mid-term, replacing existing Highway 212 for freight, regional and statewide trips.
  4. Completion of the Rock Creek Junction to 222nd segment in the long-term, based on the level of development in the Damascus town center, and the need to construct a through-trip facility that bypasses Damascus. Completing this segment last also minimizes the effects of adding capacity in this corridor on rural activities, since the improvements would operate near capacity at the time of construction, by design.

These provisions in the 2040 Growth Concept and 2000 Regional Transportation Plan establish both a need for the Sunrise improvements, and a phasing mechanism that implements the improvements in a way that complements planned urbanization, while protecting rural areas from urban traffic pressures.

## OAR 660-012-0070(7) and (8)

**Summary of OAR 660-012-0070(7) and (8) and related ORS 197.732(1)(c)(C) and (D); Goal 2, Part II(c)(3) and (4); and OAR 660-004-0020(2)(c) and (d):**

OAR 660-012-0070(7) provides that to comply with Goal 2, Part II(c)(3), the exception must compare the economic, social, environmental and energy consequences of the proposed location with other locations requiring exceptions. The exception must discuss "whether the net adverse impacts associated with the proposed exception site are significantly more adverse than the net impacts from other locations which would also require an exception." The proposed exception would fail only if the impacts associated with it are "significantly more adverse" than the other identified exception sites. The evaluation of consequences may be generalized rather than site-specific.

OAR 660-012-0070(8) provides that comply with Goal 2, Part II(c)(4), the exception must describe the adverse effects that the proposed transportation improvement is likely to have on the surrounding rural lands and land uses, including increased traffic and pressure on non-farm or highway-oriented development on areas made more accessible

by the transportation improvement. This section also requires, as part of the exception, facility design and land use measures which minimize accessibility of rural lands from the proposed transportation facility and support continued rural use of surrounding lands.

OAR 660-04-020(2)(c) is similar to OAR 660-012-0070(7). It requires a general description of the character of each alternative area and discussion of the advantages and disadvantages of the various alternatives, including positive and negative consequences. Like OAR 660-012-0070 (7), the exception must explain why the use at the chosen site is not "significantly more adverse" than would typically result from the same proposal being located at one of the exception sites. Considerations include which resource lands are most productive; the ability to sustain resource uses near the proposed use and long-term economic impact on general area resulting from removal of land from the resource base.

Similarly, OAR 660-004-0020(2)(d) requires the exception to explain how the proposed use is compatible with other adjacent uses or will be rendered compatible through measures designated to reduce adverse impacts. "Compatible" is not intended to mean no interference or adverse impacts of any type with adjacent uses. The proposed transportation improvement must be determined to either be compatible with the existing uses or can be rendered compatible through measures designed to reduce adverse impacts.

**Finding of compliance with OAR 660-012-0070(7) and (8) and related ORS 197.732(1)(c)(C) and (D); Goal 2, Part II(c)(3) and (4); and OAR 660-004-0020(2)(c) and (d):**

Final determination of a specific alignment for the Sunrise Corridor improvement is deferred to further study in Section 6.7.5 in Chapter 6 of the 2000 RTP. Because no specific alignment is proposed at this time, it is premature to address these exception standards. If project development results in an alignment outside the UGB, a further exception applying these standards will be required.

A preliminary analysis of the Sunrise Corridor shows the following potential adverse impacts of the limited access highway, depending on the alignment chosen as part of the project development stage:

- **Agricultural and Forest Lands**
  The Sunrise Corridor improvement could have direct impacts on some agricultural or forest lands, designated EFU, EFC, AGF or AF-20, depending on the alignment chosen for the highway improvement as part of the project development stage. Several parcels designated as EFU lands are located in the eastern portions of the corridor, with nurseries as the predominate agricultural use. Indirect impacts could range from the loss of crop income from the local economy to the disruption of farming activities such as crop spraying and harvesting.

  The predominate uses in the corridor are rural residential, rural commercial, rural industrial and agriculture. The Damascus and Boring commercial districts are urbanized, rural centers of commerce that serve both rural and urban populations. The Boring district also includes a number of industrial uses. Both districts include institutional uses, such as schools, fire stations and a post office. Many exception-land parcels have residential development and related improvements, approaching urban densities in several areas.

  While the existing alignment alternative may have the least impact on farm and forest resource lands, and other natural resources, it is likely the most costly and disruptive to existing development in the corridor. Therefore, the southern and northern new alignments will also be evaluated for impacts on rural resources as part of the Sunrise Corridor project development phase.

  Ultimately, project design of the preferred alignment of the Sunrise Corridor improvements will need to determine whether reasonable mitigation measures can minimize operational impacts, support planned land use, enhance compatibility with existing land uses and avoid splitting natural resource areas. The specific alignment will be determined by ODOT following preparation of a design-level (Tier II) environmental analysis in a manner consistent with federal requirements set out in the National Environmental Policy Act and implementing regulations, including public and agency involvement processes and opportunity for public comment. This process also will require ODOT to address and show compliance with all applicable local government and agency ordinances, regulations and permit requirements, including provisions for mitigation of adverse impacts.

- **Natural resources**
  Natural resources could be affected by an alignment within the southern corridor due to potential fragmentation or alteration of wildlife habitat, loss of riparian areas, alteration of wetlands, stormwater runoff and stream or floodplain crossings, depending on the alignment chosen for the limited access expressway at the project development stage.

  The corridor crosses several areas designated as stream protection corridors in Title 3 of the 1996 Urban Growth Management Functional Plan. Environmental impacts in these and other natural resource areas would be addressed during the project

development phase. Design standards or policies that limit impervious surface coverage, stormwater runoff and the type and number of stream crossings and crossings of wildlife corridors will be addressed as part of Metro's Green Streets project. The Green Streets project will develop street design guidelines and best management practices that avoid, minimize and/or mitigate the impacts of transportation facilities on streams, wetlands and floodplains and wildlife corridors. This work is expected to be complete by June 2001, prior to further evaluation of the proposed transportation improvement as part of the Sunrise Corridor refinement study.

## Conclusion

The corridor has been acknowledged as consistent with statewide planning goals by the Land Conservation and Development Commission as part acknowledging the 2040 Growth Concept. The *2000 Regional Transportation Plan* recognizes that the need, mode, function and general location for the Sunrise Corridor highway improvement have been established in the *Sunrise DEIS*, and based on additional analysis conducted as part of the *2000 RTP* update. Therefore, these additional findings augment the 1996 acknowledgement of the Sunrise Corridor improvements as an element of the 2040 Growth Concept.

However, more detail is needed as part of project development before construction can occur. The project development stage would include specific design details, a project location or alignment, access points and determination of impacts on the natural and built environment, and farm and forest resource lands.