

# Metro | Agenda

Meeting: Metro Policy Advisory Committee (MPAC)  
Date: Wednesday, May 26, 2010  
Time: 5 to 7 p.m.  
Place: Council Chambers

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|----------------|-----|---|---|
| <b>5 PM</b>    | 1.  | <b><u>CALL TO ORDER</u></b>   | <b>Shane Bemis, Chair</b>                           |
| <b>5:02 PM</b> | 2.  | <b><u>SELF INTRODUCTIONS &amp; COMMUNICATIONS</u></b>   | <b>Shane Bemis, Chair</b>                           |
| <b>5:05 PM</b> | 3.  | <b><u>CITIZEN COMMUNICATIONS ON NON-AGENDA ITEMS</u></b>  |   |
| <b>5:10 PM</b> | 4.  | * Consideration of the MPAC Minutes for May 12, 2010  |   |
| <b>5:15 PM</b> | 5.  | <b><u>COUNCIL UPDATE</u></b>  |   |
|                | 6.  | <b><u>ACTION ITEMS</u></b>  |   |
| <b>5:20 PM</b> | 6.1 | * 2035 Regional Transportation Plan Adoption -<br><b><u>RECOMMENDATION TO THE METRO COUNCIL REQUESTED</u></b> <ul style="list-style-type: none"><li>• Ordinance No. 10-1241A, "For the Purpose of Amending the 2035 Regional Transportation Plan (Federal Component) and the 2004 Regional Transportation Plan to Comply with Federal and State Law; To Add the Regional Transportation Systems Management and Operations Action Plan, the Regional Freight Plan and the High Capacity Transit System Plan; To Amend the Regional Transportation Functional Plan and Add it to the Metro Code; To Amend the Regional Framework Plan; And to Amend the Urban Growth Management Functional Plan</li></ul> | <b>Kim Ellis</b>                                    |
|                | 7.  | <b><u>INFORMATION / DISCUSSION ITEMS</u></b>  |   |
| <b>5:50 PM</b> | 7.1 | * MPAC Employment Subcommittee Report Addressing Large Industrial Site Demand – <b><u>INFORMATION / DISCUSSION</u></b>  | <b>Malu Wilkinson<br/>Gary Barth, Clackamas Co.</b> |
| <b>6:50 PM</b> | 7.2 | Ordinance 10-1238, "For the Purpose of Adopting Urban Reserves and Conforming Amendments to the Regional Framework Plan and the Urban Growth Management Functional Plan" – <b><u>STATUS REPORT ON EXHIBIT A, RESERVES MAP</u></b>   | <b>John Williams</b>                                |
| <b>6:55PM</b>  | 8.  | <b><u>MPAC MEMBER COMMUNICATION</u></b>   |   |
| <b>7 PM</b>    | 9.  | <b><u>ADJOURN</u></b>   | <b>Shane Bemis, Chair</b>                           |

\* Material available electronically.

\*\* Materials will be distributed electronically prior to the meeting.

# Material provided at meeting.

All material will be available at the meeting.

For agenda and schedule information, call Kelsey Newell at 503-797-1916, e-mail: [kelsey.newell@oregonmetro.gov](mailto:kelsey.newell@oregonmetro.gov).

To check on closure or cancellations during inclement weather please call 503-797-1700x.



## **2010 MPAC Tentative Agendas**

*Tentative as of May 19, 2010*

<p><b><u>MPAC Meeting</u></b> May 12</p> <ul style="list-style-type: none"> <li>• Ordinance 10-1238, Adopting Urban Reserves (recommendation to council)</li> <li>• MPAC Employment Subcommittee Report (discussion)</li> <li>• Sustainable Communities Planning Grant Program (information)</li> <li>• Public Investments, Private Development, and Local Aspirations (information)</li> <li>• Final Status on RTP package (information)</li> </ul>	<p><b><u>MPAC Meeting</u></b> May 26</p> <ul style="list-style-type: none"> <li>• 2035 RTP (recommendation to council)</li> <li>• MPAC Employment Subcommittee Report (discussion)</li> <li>• Ordinance 10-1238, Adopting Urban Reserves - Status update on Reserves map, Exhibit A</li> </ul>
<p><b><u>MPAC Meeting</u></b> June 9</p> <ul style="list-style-type: none"> <li>• Community Investment Strategy: 2010 Capacity Ordinance - Economic development and investment trends</li> <li>• 2040 Growth Concept Map</li> </ul>	<p><b><u>MPAC Meeting</u></b> June 23</p> <ul style="list-style-type: none"> <li>• Impact of local investments and actions on market's ability to use zoned capacity</li> <li>• Envision tool (visualization of investments in local communities)</li> <li>• Community Investment Strategy: 2010 Capacity Ordinance - Supporting trade-sector economy and maintaining inventory of large industrial sites (discussion)</li> </ul>
<p><b><u>MPAC Meeting</u></b> July 14</p> <ul style="list-style-type: none"> <li>• Analysis of potential UGB expansion areas             <ul style="list-style-type: none"> <li>○ Infrastructure costs</li> <li>○ Suitability of land</li> <li>○ Impact on Centers, Corridors and Employment areas</li> <li>○ Alternatives for residents and large-lot industrial expansion areas</li> </ul> </li> <li>• Employment Toolkit</li> <li>• Climate Prosperity</li> </ul>	<p><b><u>MPAC Meeting</u></b> July 28</p>

<p><b><u>MPAC Meeting</u></b> August 11</p> <ul style="list-style-type: none"> <li>• Presentation of COO recommendation</li> </ul>	<p><b><u>MPAC Meeting</u></b> August 25</p>
<p><b><u>MPAC Meeting</u></b> September 8</p> <ul style="list-style-type: none"> <li>• Draft Ordinance to meet 20-year forecasted growth (discussion) <ul style="list-style-type: none"> <li>• Investment Strategy</li> <li>• Actions to meet forecasted growth</li> <li>• Regional Framework Plan/Urban Growth Management Functional Plan amendments</li> </ul> </li> </ul>	<p><b><u>MPAC Meeting</u></b> September 22</p> <ul style="list-style-type: none"> <li>• Draft Ordinance to meet 20-year forecasted growth (discussion) <ul style="list-style-type: none"> <li>• Investment Strategy</li> <li>• Actions to meet forecasted growth</li> <li>• Regional Framework Plan/Urban Growth Management Functional Plan amendments</li> </ul> </li> </ul>
<p><b><u>MPAC Meeting</u></b> October 13</p> <ul style="list-style-type: none"> <li>• Draft Ordinance to meet 20-year forecasted growth (discussion) <ul style="list-style-type: none"> <li>• Investment Strategy</li> <li>• Actions to meet forecasted growth</li> <li>• Regional Framework Plan/Urban Growth Management Functional Plan amendments</li> </ul> </li> </ul>	<p><b><u>MPAC Meeting</u></b> October 27</p> <ul style="list-style-type: none"> <li>• Draft Ordinance to meet 20-year forecasted growth (discussion) <ul style="list-style-type: none"> <li>• Investment Strategy</li> <li>• Actions to meet forecasted growth</li> <li>• Regional Framework Plan/Urban Growth Management Functional Plan amendments</li> </ul> </li> </ul>
<p><b><u>MPAC Meeting</u></b> November 10</p> <ul style="list-style-type: none"> <li>• Draft Ordinance to meet 20-year forecasted growth (discussion) <ul style="list-style-type: none"> <li>• Investment Strategy</li> <li>• Actions to meet forecasted growth</li> <li>• Regional Framework Plan/Urban Growth Management Functional Plan amendments</li> </ul> </li> </ul>	<p><b><u>MPAC Meeting</u></b> November 17</p> <ul style="list-style-type: none"> <li>• Draft Ordinance to meet 20-year forecasted growth (recommendation to council) <ul style="list-style-type: none"> <li>• Investment Strategy</li> <li>• Actions to meet forecasted growth</li> <li>• Regional Framework Plan/Urban Growth Management Functional Plan amendments</li> </ul> </li> </ul>
<p><b><u>MPAC Meeting</u></b> December 15</p>	



METRO POLICY ADVISORY COMMITTEE

May 12, 2010

Metro Regional Center, Council Chambers

MEMBERS PRESENT

Shane Bemis, Chair  
Pat Campbell  
Jody Carson  
Nathalie Darcy  
Amanda Fritz  
Dick Jones  
Charlotte Lehan, Vice Chair  
Keith Mays  
Rod Park  
Wilda Parks  
Alice Norris  
Judy Shiprack  
Rick VanBeveren  
Jerry Willey, Second Vice Chair

AFFILIATION

City of Gresham, representing Multnomah Co. 2<sup>nd</sup> Largest City  
City of Vancouver  
City of West Linn, representing Clackamas Co. Other Cities  
Washington County Citizen  
City of Portland Council  
Clackamas County Special Districts  
Clackamas County Commission  
City of Sherwood, representing Washington Co. Other Cities  
Metro Council  
Clackamas County Citizen  
City of Oregon City, rep. Clackamas Co. 2<sup>nd</sup> Largest City  
Multnomah County Commission  
TriMet Board of Directors  
City of Hillsboro, representing Washington Co. Largest City

MEMBERS EXCUSED

Sam Adams  
Ken Allen  
Matt Berkow  
Tom Brian  
Richard Burke  
Dennis Doyle  
Jack Hoffman  
Carl Hosticka  
Robert Liberty  
Charlynn Newton  
Steve Stuart  
Mike Weatherby  
Dilafroz Williams  
Richard Whitman

AFFILIATION

City of Portland Council  
Port of Portland  
Multnomah County Citizen  
Washington County Commission  
Washington County Special Districts  
City of Beaverton, representing Washington Co. 2<sup>nd</sup> Largest City  
City of Lake Oswego, representing Clackamas Co. Largest City  
Metro Council  
Metro Council  
City of North Plain, representing Washington Co. outside UGB  
Clark County, Washington  
City of Fairview, representing Multnomah County Other Cities  
Governing Body of School Districts  
Oregon Department of Land Conservation & Development

ALTERNATES PRESENT

Donna Jordan  
Jim Kight  
Paul Manson  
Don Mazziotti

AFFILIATION

City of Lake Oswego, representing Clackamas Co. Largest City  
City of Troutdale, representing Multnomah Co. Other Cities  
Multnomah County Citizen  
City of Beaverton, representing Washington Co. 2<sup>nd</sup> Largest City

STAFF: Dick Benner, Andy Cotugno, Tom Matney, Robin McArthur, Kelsey Newell, John Williams, Ken Ray, Alison Kean Campbell, Malu Wilkinson, Randy Tucker, Ted Reid, Dan Cooper

**1. CALL TO ORDER AND DECLARATION OF A QUORUM**

Chair Shane Bemis declared a quorum and called the meeting to order at 5:00 p.m.

**2. SELF INTRODUCTIONS AND COMMUNICATIONS**

Audience and committee members introduced themselves.

**3. CITIZEN COMMUNICATIONS ON NON-AGENDA ITEMS**

There was none.

**4. CONSENT AGENDA**

MOTION: Councilor Donna Jordan moved, Commissioner Amanda Fritz seconded, to approve the MPAC minutes from April 28, 2010.

ACTION TAKEN: With all in favor, the motion passed.

**5. COUNCIL UPDATE**

Councilor Rod Park updated the committee on the following items:

- The Regional Transportation Plan (RTP) public comment period ended Thursday, May 6. MPAC will provide a recommendation to the Metro Council on May 26. JPACT and the Metro Council are scheduled to vote on the final RTP on June 10.
- A new transit-oriented development opened near Clackamas Town Center on May 4.
- The grand opening of Graham Oaks Nature Park in Wilsonville will take place the weekend of September 17-18.
- The independent citizen oversight committee that tracks the 2006 natural areas bond measure is getting ready for a change in leadership. Peter Krainock, CEO of American International Supply, is ending a three-year term as the committee's first chairman. Linda Craig, a CPA who has served as board president for the Audubon Society of Portland, will take the helm in June.
- The new, eighth edition of the Bike There! map is now available. There are free paper maps and more durable, waterproof maps can be purchased for \$9.00 at Metro and at local bike shops around the region. The map covers the entire Metro area from Hagg Lake to Sandy and from Brush Prairie, Washington, to Canby and features more than 600 miles of on-street bike routes and 235 miles of off-street trails.

Mr. Andy Cotugno of Metro updated the committee on the HUD Sustainability Planning Grant. The US Departments of Housing and Urban Development (HUD) and Transportation (DOT) and

the Environmental Protection Agency (EPA) have come together to form The Partnership for Sustainable Communities. The Partnership has launched a major new effort, the Sustainable Communities Initiative (SCI), adopted Livability Principles, and initiated the HUD Sustainability Planning Grant.

SCI's Livability Principles mirror the values that underline the Portland region's nationally recognized long-range plan, the 2040 Growth Concept. Metro has proposed a framework for a collaborative regional SCI grant proposal to enhance and implement elements of the 2040 Growth Concept as informed by the Livability Principles. The framework is being reviewed and discussed by public, private and nonprofit sector partners in advance of the release of HUD's SCI Notice of Funding Availability (NOFA) in May.

## **6. ACTION ITEMS**

### **6.1 Ordinance No. 10-1238, "For the Purpose of Adopting Urban Reserves and Conforming Amendments to the Regional Framework Plan and the Urban Growth Management Functional Plan"**

Mr. John Williams of Metro reviewed the timeline of the Urban and Rural Reserves process to date and overviewed the components of Ordinance 10-1238.

Mr. Dick Benner of Metro briefed the committee on *Title 11: Planning for New Urban Areas* (attached as Exhibit D of Ordinance 1238), specifically highlighting updated sections per MPAC's recommendations at their April 28 meeting.

MOTION #1: Mayor Alice Norris moved, Ms. Wilda Parks seconded, to recommend to the Metro Council approval of Ordinance No. 10-1238, excluding the Urban and Rural Reserves map (attached as Exhibit A of Ordinance No. 10-1238).

AMENDMENT #1: Commissioner Amanda Fritz moved to amend the motion to delete from Exhibit D, *Title 11: Planning for New Urban Areas*, Section 3.07.1110.E. Mayor Norris and Ms. Parks accepted the change as a friendly amendment.

Discussion: The committee discussed the impetus for and the implications of deleting Section 3.07.1110.E of *Title 11: Planning for New Urban Areas* from Ordinance No. 10-1238.

ACTION TAKEN ON AMENDMENT #1: Commissioner Fritz withdrew her amendment.

ACTION TAKEN: Mayor Norris and Ms. Parks withdrew their motion.

Commissioner Fritz and Chair Bemis excused themselves from the MPAC meeting. Vice Chair Charlotte Lehan assumed responsibility as Chair of the MPAC meeting.

Discussion: Councilor Park discussed the importance of concept plans in allowing jurisdictions to compare the costs and benefits of reinvesting in current communities versus expansion via the acquisition of land outside the Urban Growth Boundary. The issue of governance in relation to concept plans remains an outstanding issue that will require more work.

MOTION #2: Mayor Mays moved, Mr. Dick Jones seconded, to recommend to the Metro Council approval of Ordinance No. 10-1238, excluding the Urban and Rural Reserves map (attached as Exhibit A of Ordinance No. 10-1238).

AMENDMENT #2: Commissioner Judy Shiprack moved, Councilor Jody Carson seconded, to amend the motion to delete from Exhibit D, *Title 11: Planning for New Urban Areas*, Section 3.07.1110.E.

Discussion: The committee again discussed the impetus for and the implications of deleting Section 3.07.1110.E of *Title 11: Planning for New Urban Areas* from Ordinance No. 10-1238.

ACTION TAKEN ON AMENDMENT #2: Commissioner Shiprack and Councilor Carson withdrew their amendment.

AMENDMENT #3: Councilor Donna Jordan moved, Mayor Norris seconded, to amend the motion to attach an addendum to the recommendation that reflects MPAC's concern with *Title 11: Planning for New Urban Areas*, Section 3.07.1110.E, including the issues that may arise when local jurisdictions cannot agree on a concept plan for land brought into the Urban Growth Boundary.

Discussion: The committee again discussed the impetus for and the implications of deleting Section 3.07.1110.E of *Title 11: Planning for New Urban Areas* from Ordinance No. 10-1238. The committee charged Metro staff with providing future updates to MPAC on any map change proposals to the Urban and Rural Reserves map.

ACTION TAKEN: With 9 in favor (Carson, Darcy, Jordan, Kight, Lehan, Norris, Parks, Shiprack, VanBeveren) and 4 opposed (Jones, Manson, Mays, Willey), amendment #3 passed.

ACTION TAKEN: With 10 in favor (Carson, Darcy, Jordan, Kight, Lehan, Manson, Norris, Parks, Shiprack, VanBeveren), and 3 opposed (Jones, Mays, Willey), the motion passed as amended.

**7. INFORMATION/ DISCUSSION ITEMS**

**7.1 Status on Final Regional Transportation Plan Adoption Package**

Ms. Robin McArthur of Metro reviewed the timeline of the Regional Transportation Plan and overviewed the components of the RTP adoption package. MPAC is scheduled to make a recommendation to the Metro Council on May 26.

**7.2 MPAC Employment Subcommittee Report Addressing Large Industrial Site Demand**

Due to time constraints, this discussion item was postponed until the May 26 MPAC meeting.

**7.3 Public Investments, Private Development, and Local Aspirations**

Ms. McArthur overviewed the schedule for the Making the Greatest Place integrated investment strategy timeline and highlighted key decision deadlines for the 2010-12 period.

**7. MPAC MEMBER COMMUNICATIONS**

There were none.

**8. ADJOURN**

Vice Chair Lehan adjourned the meeting at 6:48 pm.

Respectfully submitted,



Recording Secretary



**ATTACHMENTS TO THE PUBLIC RECORD FOR MAY 12, 2010:**

The following have been included as part of the official public record:

<b>ITEM</b>	<b>DOCUMENT TYPE</b>	<b>DOC DATE</b>	<b>DOCUMENT DESCRIPTION</b>	<b>DOCUMENT No.</b>
<b>5</b>	Handout	n/a	Bike There! Map and accessories	051210m-01
<b>6.1</b>	Handout	05/06/2010	Exhibit D of Ordinance No. 10-1238 - Title 11: Planning for New Urban Areas	051210m-02
<b>7.1</b>	Report	May 2010	2035 Regional Transportation Plan Public Comment Report	051210m-03
<b>7.2</b>	Memo	03/31/2010	West Wash Co. / Metro Region Competitive Large Industrial Site Supply	051210m-04
<b>7.2</b>	Memo	01/25/2010	Competitive Markets & Market Factor Approach to Large Industrial Site Provision	051210m-05
<b>7.2</b>	Memo	05/12/2010	2009 Urban Growth Report (UGR); Feedback on MPAC Subcommittee Draft Recommendations	051210m-06
<b>7.3</b>	Handout	3/10/2010	Making the Greatest Place 2010 Decisions handout distributed by Robin McArthur	051210m-07



Date: May 19, 2010  
To: MPAC and interested parties  
From: Kim Ellis, Principal Transportation Planner  
Re: RTP Adoption Package - Ordinance No. 10-1241A – RECOMMENDATION REQUESTED

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## BACKGROUND

The region is in the final adoption phase for the Regional Transportation Plan (RTP). A third and final 45-day public comment opportunity began on March 22 and ended on May 6, 2010. On May 19, MTAC recommended MPAC approval of the RTP adoption package by a vote of 16-0. The Oregon Department of Transportation, Department of Land Conservation and Development, the City of Sherwood and 1000 Friends of Oregon abstained from the vote.

## ACTION REQUESTED

- Recommend Metro Council approval of Ordinance No. 10-1241A.

## FINAL MTAC COMMENTS ON ORDINANCE NO. 10-1241A FOR MPAC CONSIDERATION

- **It is time to move the RTP forward and initiate implementation to achieve the region's desired outcomes.** The RTP establishes a new outcomes-based framework and includes new policies, tools and actions to guide future planning and investment decisions. The RTP State System includes a number of investments that will strongly influence the shape of our region. Absent those investments and other transportation and land use actions needed to accommodate a majority of future growth in areas served by transit, the region may be forced to expand the urban growth boundary in ways that do not support a reduction in GHG emissions and other desired outcomes. Work is already underway to translate the new RTP policies and performance targets into project selection criteria as part of the Regional Flexible Fund process. Local plan updates, corridor refinement plans and the regional climate scenarios effort will also build on this foundation.
- **The region needs to continue working to change state policies and develop alternative mobility policies to support implementation of this new outcomes-based approach.** Existing volume-to-capacity-focused mobility policies and measures have limited applicability and flexibility under the new outcomes-based RTP, particularly when addressing the Transportation Planning Rule provisions for future plan amendments. Allowing a 30 percent trip reduction credit in specific areas and use of the RTP State System as the baseline for future plan amendments is an important first step, but it is not adequate.
- **The region needs to expand data collection and performance monitoring efforts.** New tools are needed to evaluate and diagnose our transportation system. The region must remain committed to further development of these tools and maintaining the data needed to monitor performance in the future.
- **Local plan updates are phased appropriately to support local desires for completing plan updates in a timely manner, in coordination with other planning efforts and to take advantage of state funding opportunities.** The City of Forest Grove requested a 2013 compliance date at the MTAC

meeting. This is reflected in Table 3.08-4 in Exhibit E (Regional Transportation Functional Plan). All of the actions included in the functional plan will help improve mobility in the region and support other desired outcomes.

- **The proposed amendment to remove the Tualatin Road project from the RTP (Project #10731) may warrant further discussion.** See the recommended action for comment #92 in Exhibit H.

## OVERVIEW OF ORDINANCE NO. 10-1241A

- **ORDINANCE AND STAFF REPORT (Attachment 1)** includes a full public comment report that documents all comments received during the public comment period)
- **EXHIBITS A through D (Draft 2035 Regional Transportation Plan and Appendices (project list), and related modal plans)** - These exhibits include the draft 2035 Regional Transportation Plan (RTP) and project list, Regional Transportation System Management and Operations Plan (TSMO), Regional Freight Plan, and High Capacity Transit Plan Summary Report. Amendments to the RTP document and appendices are documented in Exhibit H, but have not been incorporated in Exhibit A.
- **EXHIBIT E (Draft Regional Transportation Functional Plan)** – This exhibit codifies existing and new requirements that local plans must comply with to be consistent with the RTP. The exhibit has been the focus of public comments received to date, and includes amendments documented in Exhibit H. Table 3.08-4 includes a work plan for local plan updates that will be triggered by adoption of the RTP. This work plan was developed in coordination with each city and county.
- **EXHIBIT F (Repeal of Regional Parking Policy)** – This exhibit repeals Title 2 of the Urban Growth Management Functional Plan. Regional parking policies are now included in Title 4 of the Regional Transportation Functional Plan.
- **EXHIBIT G (Amendments to Chapter 2 of the Regional Framework Plan)** – This exhibit amends the existing Chapter 2 of the Regional Framework Plan with the new goals and objectives included in Chapter 2 of the 2035 Regional Transportation Plan.
- **EXHIBIT H (Summary of Comments and Recommended Action)** – This exhibit documents substantive comments and recommended amendments to Exhibit A and Exhibit E. No public comments were received on Exhibits B, C, D, F or G.
- **EXHIBIT I (Findings of Fact and Conclusions of Law)** – This exhibit includes legal findings that demonstrate consistency of the RTP with federal, state and regional requirements. This exhibit is under development.

## NEXT STEPS

A summary of upcoming milestones and advisory committee final actions is provided for reference.

May 26, 2010	MPAC final recommendation on 2035 RTP
May 28, 2010	TPAC final recommendation on air quality conformity and 2035 RTP
June 10, 2010	JPACT and the Metro Council final action on RTP
June 15, 2010	RTP and findings submitted to the Land Conservation and Development Commission in the manner of periodic review for approval
	Joint 2035 RTP and 2010-13 Metropolitan Transportation Improvement Program (MTIP) air quality conformity determination and findings submitted to U.S. DOT for review and approval

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF AMENDING THE 2035 REGIONAL TRANSPORTATION PLAN (FEDERAL COMPONENT) AND THE 2004 REGIONAL TRANSPORTATION PLAN TO COMPLY WITH FEDERAL AND STATE LAW; TO ADD THE REGIONAL TRANSPORTATION SYSTEMS MANAGEMENT AND OPERATIONS ACTION PLAN, THE REGIONAL FREIGHT PLAN AND THE HIGH CAPACITY TRANSIT SYSTEM PLAN; TO AMEND THE REGIONAL TRANSPORTATION FUNCTIONAL PLAN AND ADD IT TO THE METRO CODE; TO AMEND THE REGIONAL FRAMEWORK PLAN; AND TO AMEND THE URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN ) Ordinance No. 10-1241A ) Introduced by Chief Operating Officer Michael Jordan with the Concurrence of Council President David Bragdon

WHEREAS, federal and state law require Metro to adopt a transportation plan for the region and to revise it at least every four years to keep it up to date; and

WHEREAS, Phase 1 of the Regional Transportation Plan (RTP) update focused on development of the federally-recognized metropolitan plan (“Federal Component”) for the Portland metropolitan region that serves as the threshold for all federal transportation funding in the region; and

WHEREAS, the Metro Council adopted the federal component of the 2035 RTP by Resolution No. 07-3831B (For the Purpose of Approving the Federal Component of the 2035 Regional Transportation Plan Update, Pending Air Quality Conformity Analysis) on December 13, 2007, deferring adoption of the state component (required by state law) in order to address outstanding issues identified during development of the federal component; and

WHEREAS, the U.S. Department of Transportation approved the federal component of the 2035 RTP on March 5, 2008; and

WHEREAS, Phase 2 of the RTP focused on development of the state component of the 2035 RTP; and

WHEREAS, OAR 660-012-0016 directs coordination of the federally-required regional transportation plan with regional transportation system plans such that the state component of the 2035 RTP must be adopted within one year of the federal component or within a timeline and work program approved by the Land Conservation and Development Commission (“LCDC”); and

WHEREAS, on May 1, 2008, the LCDC accepted the RTP into the periodic review process and approved the work program and timeline for the state component of the RTP, which called for completing the RTP by December 2009, pending final review and analysis for air quality conformance; and

WHEREAS, the RTP is a central tool for implementing the 2040 Growth Concept and is part of, and must be consistent with, Metro’s Regional Framework Plan; and

WHEREAS, the state component of the 2035 RTP is intended to serve as the regional transportation system plan under statewide planning Goal 12 and the state Transportation Planning Rule, and must be consistent with those laws; and

WHEREAS, the RTP must be consistent with other statewide planning goals and the state transportation system plan as contained in the Oregon Transportation Plan and its several components; and

WHEREAS, central to the 2035 RTP is an overall emphasis on outcomes, system completeness and measurable performance to hold the region accountable for making progress toward the region's desired outcomes and state goals for reductions in vehicle miles traveled and corresponding greenhouse gas emissions; and

WHEREAS, the Metro Council accepted elements of the Regional High Capacity Transit System Plan by Resolution No. 09-4052 (For the Purpose of Accepting the Regional High Capacity Transit System Tiers and Corridors, System Expansion Policy Framework and Policy Amendments) on July 9, 2009, for addition to the 2035 Regional Transportation Plan; and

WHEREAS, the Metro Council accepted the 2035 Regional Transportation Plan ("RTP") and related elements by Resolution No. 09-4099 (For the Purpose of Accepting the Draft 2035 Regional Transportation Plan, With the Following Elements, For Final Review and Analysis For Air Quality Conformance: The Transportation System Management and Operations Plan; The Regional Freight Plan; The High Capacity Transit System Plan; and The Regional Transportation Functional Plan) on December 17, 2009; and

WHEREAS, a third and final 45-day public comment period on the 2035 RTP was provided from March 22 to May 6, 2010; and

WHEREAS, the Metro Council, the Joint Policy Advisory Committee on Transportation ("JPACT"), the Metro Policy Advisory Committee ("MPAC"), the Metro Technical Advisory Committee ("MTAC"), the Transportation Policy Advisory Committee ("TPAC"), the Regional Travel Options ("RTO") subcommittee of TPAC, the Intelligent Transportation Systems ("ITS") Subcommittee of TPAC, the Regional Freight and Goods Movement Technical Advisory Committee, the Bi-State Coordination Committee, the Regional Freight and Goods Movement Task Force, the Regional Transportation Coordinating Council ("RTCC"), the Federal Highway Administration and the Federal Transit Administration, and other elected officials, representatives of business, environmental and transportation organizations from the Portland-Vancouver metropolitan area assisted in the development of the federal and state components of the 2035 RTP and provided comment on the RTP throughout the planning process; and

WHEREAS, JPACT and MPAC have recommended approval of ~~the state component of~~ the 2035 RTP by the Council; and

WHEREAS, the Metro Council held public hearings on the 2035 RTP and its components identified in Exhibit A, Exhibit B, Exhibit C, Exhibit D, Exhibit E, Exhibit F, Exhibit G, and H on May 6 and June 10, 2010; now, therefore,

THE METRO COUNCIL ORDAINS AS FOLLOWS:

1. The 2004 Regional Transportation Plan is hereby amended to become the 2035 Regional Transportation Plan (RTP), as indicated in Exhibit A and Appendices, attached and incorporated into this ordinance.

2. The Regional Transportation Systems Management and Operations Action Plan in Exhibit B, attached and incorporated into this ordinance, is hereby adopted as a component of the 2035 Regional Transportation Plan.
3. The Regional Freight Plan in Exhibit C, attached and incorporated into this ordinance, is hereby adopted as a component of the 2035 RTP.
4. The High Capacity Transit System Plan in Exhibit D, attached and incorporated into this ordinance, is hereby adopted as a component of the 2035 RTP.
5. The Regional Transportation Function Plan (“RTFP”), contained in section 6.4 of the 2004 RTP, is hereby amended as indicated in Exhibit E, attached and incorporated into this ordinance, and added to the Metro Code as Chapter 3.08.
6. Title 2 (Regional Parking Policy) of the Urban Growth Management Functional Plan is hereby repealed as indicated in Exhibit F, attached, and is incorporated into the RTFP, as indicated in Exhibit E.
7. Chapter 2 (Transportation) of Metro’s Regional Framework Plan is hereby amended, as indicated in Exhibit G, attached and incorporated into this ordinance, to reflect the new transportation policies in the 2035 RTP in Exhibit A.
8. The “Summary of Comments Received and Recommended Actions,” attached as Exhibit H, is incorporated by reference and hereby amends Exhibit A and Exhibit E.
- 8.9. The Findings of Fact and Conclusions of Law in Exhibit H, attached and incorporated into this ordinance, explain how these amendments comply with the Regional Framework Plan, statewide planning laws and the Oregon Transportation Plan and its applicable components.
- 9.10. Staff is directed to submit this ordinance and exhibits to the Land Conservation and Development Commission (LCDC) in the manner of periodic review.
11. The 2035 RTP and its components are hereby adopted as the federally-recognized metropolitan transportation plan and shall be transmitted to the U.S. Department of Transportation.

ADOPTED by the Metro Council this 10th day of June, 2010.

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David Bragdon, Council President

Attest:

Approved as to form:

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Anthony Andersen, Recording Secretary

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Daniel B. Cooper, Metro Attorney

CLICK HERE FOR FULL REPORT

March 2010  
Final draft plan



**Exhibit A to Ordinance No. 10-1241A**

**2035**

**REGIONAL TRANSPORTATION PLAN**

**Final draft plan**

**March 2010**

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Exhibit A to Ordinance No. 10-1241A

**TECHNICAL APPENDIX**

**2035**

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**Exhibit B to Ordinance No. 10-1241A**

REGIONAL TRANSPORTATION  
SYSTEM MANAGEMENT AND OPERATIONS

2010 – 2020

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**Exhibit C to Ordinance No. 1241A**

REGIONAL FREIGHT PLAN

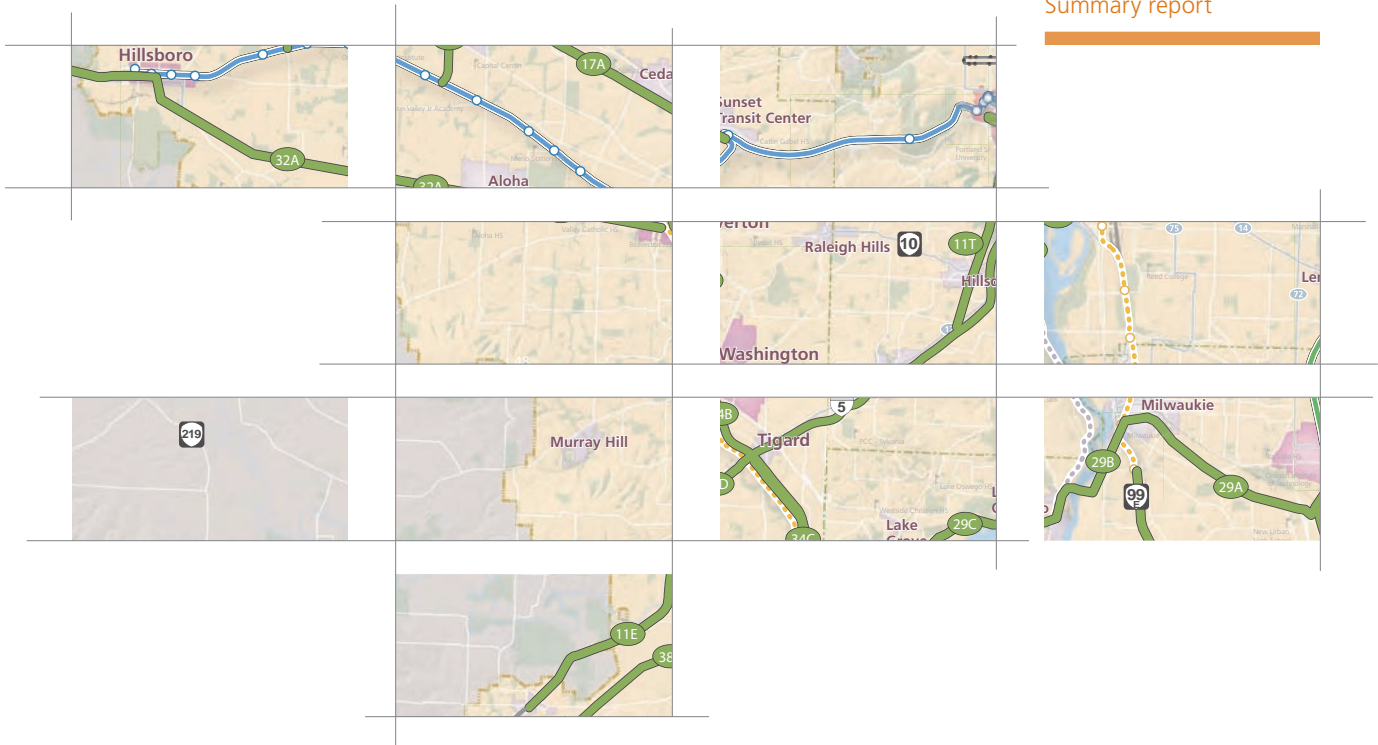
2035

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March 2010

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March 22, 2010  
Summary report



**Exhibit D to Ordinance No. 10-1241A**

REGIONAL HIGH CAPACITY TRANSIT SYSTEM PLAN

2035

Summary report

March 22, 2010

Exhibit E to Ordinance No. 10-1241A

CHAPTER 3.08

**REGIONAL TRANSPORTATION FUNCTIONAL PLAN Version 34.0(with  
proposed amendments ~~incorporated~~shown in strikethrough and  
underscore)  
4/28 5/14/10**

SECTIONS	TITLE
3.08.010	Purpose of Regional Transportation Functional Plan
<b>TITLE 1:</b>	<b>TRANSPORTATION SYSTEM DESIGN</b>
3.08.110	Street System Design
3.08.120	Transit System Design
3.08.130	Pedestrian System Design
3.08.140	Bicycle System Design
3.08.150	Freight System Design
3.08.160	Transportation System Management and Operations
<b>TITLE 2:</b>	<b>DEVELOPMENT AND UPDATE OF TRANSPORTATION SYSTEM PLANS</b>
3.08.210	Transportation Needs
3.08.220	Transportation Solutions
3.08.230	Performance Targets and Standards
<b>TITLE 3:</b>	<b>TRANSPORTATION PROJECT DEVELOPMENT</b>
3.08.310	Defining Projects in Transportation System Plans
<b>TITLE 4:</b>	<b>REGIONAL PARKING MANAGEMENT</b>
3.08.410	Parking Management
<b>TITLE 5:</b>	<b>AMENDMENT OF COMPREHENSIVE PLANS</b>
3.08.510	Amendments of City and County Comprehensive and Transportation System Plans
<b>TITLE 6:</b>	<b>COMPLIANCE PROCEDURES</b>
3.08.610	Metro Review of Amendments to Transportation System Plans
3.08.620	Extension of Compliance Deadline
3.08.630	Exception from Compliance
<b>TITLE 7:</b>	<b>DEFINITIONS</b>
3.08.710	Definitions

CHAPTER 3.08

REGIONAL TRANSPORTATION FUNCTIONAL PLAN

SECTIONS TITLE

3.08.010 Purpose of Regional Transportation Functional Plan

- A. ~~The Regional Transportation Functional Plan (RTFP) implements those policies of the Regional Transportation Plan (RTP) and its constituent freight, high capacity transit and transportation system management and operations plans which cities and counties of the region will carry out in their comprehensive plans, transportation system plans (TSPs), other land use regulations and transportation project development. The Regional Transportation Plan establishes an outcomes-based framework that is performance-driven and includes policies, objectives and actions that direct future planning and investment decisions to consider economic, equity and environmental objectives. —The principal performance objectives of the RTP are improved public health, safety and security for all; attraction of jobs and housing to downtowns, main streets, corridors and employment areas; creating vibrant, livable communities, sustaining the region’s economic competitiveness and prosperity; efficient management to maximize use of the existing transportation system; completion of the transportation system for all modes of travel to expand transportation choices; increasing use of the transit, pedestrian and bicycle systems; ensuring equity and affordable transportation choices; improving freight reliability; reducing vehicle miles traveled and resulting emissions; and promoting environmental and fiscal stewardship and accountability. Metro and its regional partners will continue to develop a regional data collection and performance monitoring system to better understand the benefits and impacts of actions required by this functional plan relative to the RTP performance objectives. Local plan updates and amendments should rely on Metro data and tools or other locally-developed data and tools, when practical. Through performance evaluation and monitoring the region can be a responsible steward of public funds and be more accountable and transparent about local and regional planning and investment choices.~~
- B. ~~B. —The Regional Transportation Functional Plan (RTFP) implements~~ the Goals and Objectives in section 2.3 of the

Regional Transportation Plan (RTP) and the policies of the Regional Transportation Plan (RTP) and its constituent freight, high-capacity transit and transportation system management and operations plans which cities and counties of the region will carry out in their comprehensive plans, transportation system plans (TSPs), other land use regulations and transportation project development. Local implementation of the RTP will result in a more comprehensive approach for implementing the 2040 Growth Concept, help communities achieve their aspirations for growth and support current and future efforts to achieve the principal objectives of the RTP and address climate change.

- C. The RTFP is intended to be consistent with federal law that applies to Metro in its role as a metropolitan planning organization, the Oregon Transportation Plan, and Statewide Planning Goal 12 (Transportation) and its Transportation Planning Rule (TPR). If a TSP is consistent with this RTFP, Metro shall deem it consistent with the RTP.

## **TITLE 1: TRANSPORTATION SYSTEM DESIGN**

### 3.08.110 Street System Design

- A. To ensure that new street construction and re-construction projects are designed to improve safety, support adjacent land use and balance the needs of all users, including bicyclists, transit vehicles, motorists, freight delivery vehicles and pedestrians of all ages and abilities, city and county street design regulations shall allow implementation of:
1. Complete street designs as set forth in *Creating Livable Streets: Street Design Guidelines for 2040* (2<sup>nd</sup> Edition, 2002), or similar resources consistent with regional street design policies;
  2. Green street designs as set forth in *Green Streets: Innovative Solutions for Stormwater and Street Crossings* (2002) and *Trees for Green Streets: An Illustrated Guide* (2002) or similar resources consistent with federal regulations for stream protection; and

3. Transit-supportive street designs that facilitate existing and planned transit service pursuant subsection 3.08.120B.

B. City and county local street design regulations shall allow implementation of:

1. Pavement widths of less than 28 feet from curb-face to curb-face;
2. Sidewalk widths that include at least five feet of pedestrian through zones;
3. Landscaped pedestrian buffer strips, or paved furnishing zones of at least five feet, that include street trees;
4. Traffic calming devices, such as speed bumps and cushions, woonerfs and chicanes, to discourage traffic infiltration and excessive speeds;
5. Short and direct right-of-way routes and shared-use paths to connect residences with commercial services, parks, schools, hospitals, institutions, transit corridors, regional trails and other neighborhood activity centers; and
6. Opportunities to extend streets in an incremental fashion, including posted notification on streets to be extended.

~~C. To provide a well-connected network of streets for local circulation and preserve the capacity of the region's principal arterials for through trips, each city and county shall amend its TSP, if necessary, to comply with the requirements set forth in subsections D through G of this section.~~

DC. To improve connectivity of the region's arterial system and support walking, bicycling and access to transit, each city and county shall incorporate into its TSP, to the extent practicable, a network of ~~four-lane~~ major arterial streets at one-mile spacing and ~~two-lane~~ minor arterial streets or collector streets at half-mile spacing considering the following:

1. Existing topography;

2. Rail lines;
3. Freeways;
4. Pre-existing development;
5. Leases, easements or covenants in place prior to May 1, 1995; and
6. The requirements of Titles 3 and 13 of the Urban Growth Management Functional Plan (UGMFP).

7. Arterial design concepts in ~~Chapter 2~~Table 2.6 and Figure 2.11 of the RTP.

7.8. Best practices and designs as set forth in Green Streets: Innovative Solutions for Stormwater, Street Crossings (2002) and Trees for Green Streets: An Illustrated Guide (2002), Creating Livable Streets: Street Design Guidelines for 2040 (2nd Edition, 2002), and state or locally-adopted plans and best practices for protecting natural resources and natural areas.

ED. To improve local access and circulation, and preserve capacity on the region's arterial system, each city and county shall incorporate into its TSP a conceptual map of new streets for all contiguous areas of vacant and re-developable lots and parcels of five or more acres that are zoned to allow residential or mixed-use development. The map shall identify street connections to adjacent areas to promote a logical, direct and connected system of streets and should demonstrate opportunities to extend and connect new streets to existing streets, provide direct public right-of-way routes and limit closed-end street designs consistent with subsection FE.

FE. If proposed residential or mixed-use development of five or more acres involves construction of a new street, the city and county regulations shall require the applicant to provide a site plan that:

1. Is consistent with the conceptual new streets map required by subsection ED;
2. Provides full street connections with spacing of no more than 530 feet between connections, except if



prevented by barriers such as topography, rail lines, freeways, pre-existing development, leases, easements or covenants that existed prior to May 1, 1995, or by requirements of Titles 3 and 13 of the UGMFP;

3. If streets must cross water features ~~—~~protected pursuant to Title 3 UGMFP, provides a crossing every 800 to 1,200 feet unless habitat quality or the length of the crossing prevents a full street connection;
4. If full street connection is prevented, provides bicycle and pedestrian accessways on public easements or rights-of-way spaced such that accessways are not more than 330 feet apart, unless not possible for the reasons set forth in paragraph 3;
5. Provides for bike and pedestrian accessways that cross water features ~~identified-protected~~ pursuant to Title 3 of the UGMFP at an average of 530 feet between accessways unless habitat quality or the length of the crossing prevents a connection;
6. If full street connection over water features ~~identified-protected~~ pursuant to Title 3 of the UGMFP cannot be constructed in centers as defined in Title 6 of the UGMFP or Main Streets shown on the 2040 Growth Concept Map, or if spacing of full street connections exceeds 1,200 feet, provides bike and pedestrian crossings at an average of 530 feet between accessways unless habitat quality or the length of the crossing prevents a connection;
7. Limits cul-de-sac designs or other closed-end street designs to circumstances in which barriers prevent full street extensions and limits the length of such streets to 200 feet and the number of dwellings along the street to no more than 25; and
8. Provides street cross-sections showing dimensions of right-of-way improvements and posted or expected speed limits.

F. For redevelopment of contiguous lots and parcels less than five acres in size that require construction of new streets, cities and counties shall establish their own standards for local street connectivity, consistent with subsection ~~F~~E.

- G. To protect the capacity, function and safe operation of existing and planned state highway interchanges, or planned improvements to interchanges, cities and counties shall, to the extent feasible, restrict driveway and street access in the vicinity of interchange ramp terminals, consistent with Oregon Highway Plan Access Management Standards, and accommodate local circulation on the local system to improve safety and minimize congestion and conflicts in the interchange area. Public street connections, consistent with regional street design and spacing standards in ~~Section 3.08.110~~ in this section, shall be encouraged and shall supercede this access restriction, though such access may be limited to right-in/right-out or other appropriate configuration in the vicinity of interchange ramp terminals. Multimodal street design features including pedestrian crossings and on-street parking shall be allowed where appropriate.

### 3.08.120 Transit System Design

- A. City and county TSPs ~~or other~~ ~~appropriate~~ regulations shall include investments, policies, standards and criteria to provide pedestrian and bicycle connections to all existing transit stops ~~where regional transit service exists at the time of TSP development or update and all existing or planned Station Communities and major transit stops designated in Figure 2.15 of the RTP.~~
- B. City and county TSPs shall include a transit plan, and implementing land use regulations, with the following elements to leverage the region's investment in transit and improve access to the transit system:
1. A transit system map consistent with the transit functional classifications shown in Figure 2.15 of the RTP that shows the locations of major transit stops, transit centers, high capacity transit stations, regional bicycle transit facilities, ~~inter-city bus~~ and rail passenger terminals designated in the RTP, transit-priority treatments such as signals, regional bicycle transit facilities, park-and-ride facilities, and bicycle and pedestrian routes, consistent with sections 3.08.130 and 3.08.140, between essential destinations and transit stops.

2. The following site design standards for new retail, office, multi-family and institutional buildings located near or at major transit stops shown in Figure 2.15 in the RTP:
  - a. Provide reasonably direct pedestrian connections between transit stops and building entrances and between building entrances and streets adjoining transit stops;
  - b. Provide safe, direct and logical pedestrian crossings at all transit stops aswhere practicable and make intersection and mid-block traffic management improvements as needed to enable marked crossings at major transit stops;
  - c. At major transit stops, require the following:
    - i. Locate buildings within 20 feet of the transit stop, a transit street or an intersecting street, or a pedestrian plaza at the stop or a street intersection;
    - ii. Transit passenger landing pads accessible to disabled persons to transit agency standards;
    - iii. An easement or dedication for a passenger shelter and an underground utility connection to a major transit stop if requested by the public transit provider; and
    - iv. Lighting to transit agency standards at the major transit stop.
    - v. Intersection and mid-block traffic management improvements as needed and practicable to enable marked crossings at major transit stops.
- C. Providers of public transit service shall consider and document the needs of youth, seniors, people with disabilities and environmental justice populations, including minorities and low-income families, when planning levels of service, transit facilities and hours of operation.

### 3.08.130 Pedestrian System Design

- A. City and county TSPs shall include a pedestrian plan, with implementing land use regulations, for an interconnected

network of pedestrian routes within and through the city or county. The plan shall include:

1. An inventory of existing facilities that identifies gaps and deficiencies in the pedestrian system;
2. An evaluation of needs for pedestrian access to transit and essential destinations for all mobility levels, including direct, comfortable and safe pedestrian routes.
3. A list of improvements to the pedestrian system that will help the city or county achieve the regional Non-SOV modal targets in Table 3.08-1 and other targets established pursuant to section 3.08.230;
4. Provision for sidewalks along arterials, collectors and most local streets, except that sidewalks are not required along controlled roadways, such as freeways; and
5. Provision for safe crossings of streets and controlled pedestrian crossings on major arterials.

B. ~~To support transit~~As an alternative to implementing section 3.08.120B2, a city or county may ~~implement the provisions of section 3.08.120B (2) by establishment of a~~ pedestrian districts in its comprehensive plan or land use regulations with the following elements:

1. A connected street and pedestrian network for the district;
2. An inventory of existing facilities, gaps and deficiencies in the network of pedestrian routes;
3. Interconnection of pedestrian, transit and bicycle systems;
4. Parking management strategies;
5. Access management strategies;
6. Sidewalk and accessway location and width;
7. Landscaped or paved pedestrian buffer strip location and width;

8. Street tree location and spacing;
  9. Pedestrian street crossing and intersection design;
  10. Street lighting and furniture for pedestrians; and
  11. A mix of types and densities of land uses that will support a high level of pedestrian activity.
- C. City and county land use regulations shall ~~ensure~~ ~~that require~~ new development ~~to provide~~s on-site streets and accessways that offer reasonably direct routes for pedestrian travel.

#### 3.08.140 Bicycle System Design

- A. City and county TSPs shall include a bicycle plan, with implementing land use regulations, for an interconnected network of bicycle routes within and through the city or county. The plan shall include:
1. An inventory of existing facilities that identifies gaps and deficiencies in the bicycle system;
  2. An evaluation of needs for bicycle access to transit and essential destinations, including direct, comfortable and safe bicycle routes and secure bicycle parking, considering *TriMet Bicycle Parking Guidelines*.
  3. A list of improvements to the bicycle system that will help the city or county achieve the regional Non-SOV modal targets in Table 3.08-1 and other targets established pursuant to section 3.08.230;
  4. Provision for bikeways along arterials, ~~major~~ collectors and ~~nearby parallel routes~~ local streets, and bicycle parking in centers, at major transit stops shown in Figure 2.15 in the RTP, park-and-ride lots and associated with institutional uses; and
  5. Provision for safe crossing of streets and controlled bicycle crossings on major arterials.

#### 3.08.150 Freight System Design

- A. City and county TSPs shall include a freight plan, with implementing land use regulations, for an interconnected system of freight networks within and through the city or county. The plan shall include:

1. An inventory of existing facilities that identifies gaps and deficiencies in the freight system;
2. An evaluation of freight access to freight intermodal facilities, employment and industrial areas and commercial districts; and
3. A list of improvements to the freight system that will help the city or county increase reliability of freight movement, reduce freight delay and achieve the targets established pursuant to section 3.08.230.

### 3.08.160 Transportation System Management and Operations

- A. City and county TSPs shall include transportation system management and operations (TSMO) plans to improve the performance of existing transportation infrastructure within or through the city or county. A TSMO plan shall include:
1. An inventory and evaluation of existing local and regional TSMO infrastructure, strategies and programs that identifies gaps and opportunities to expand infrastructure, strategies and programs;
  2. A list of projects and strategies, consistent with the Regional TSMO Plan, based upon consideration of the following functional areas:
    - a. Multimodal traffic management investments, such as signal timing, access management, arterial performance monitoring and active traffic management;
    - b. Traveler information investments, such as forecasted traffic conditions and carpool matching;
    - c. Traffic incident management investments, such as incident response programs; and
    - d. Transportation demand management investments, such as individualized marketing programs, rideshare programs and employer transportation programs.

## TITLE 2: DEVELOPMENT AND UPDATE OF TRANSPORTATION SYSTEM PLANS

### 3.08.210 Transportation Needs

- A. Each city and county shall update its TSP to incorporate regional and state transportation needs identified in the 2035 RTP and its own transportation needs. The determination of local transportation needs shall be based upon:
1. System gaps and deficiencies identified in the inventories and analysis of transportation systems pursuant to Title 1;
  2. Identification of facilities that exceed the Deficiency Thresholds and Operating Standards in Table 3.08-2 or the alternative thresholds and standards established pursuant to section 3.08.230;
  3. Consideration and documentation of the needs of youth, seniors, people with disabilities and environmental justice populations within the city or county, including minorities and low-income families.
- B. A city or county determination of transportation needs must be consistent with the following elements of the RTP:
1. The population and employment forecast and planning period of the RTP, except that a city or county may use an alternative forecast for the city or county, coordinated with Metro, to account for changes to comprehensive plan or land use regulations adopted after adoption of the RTP;
  - ~~1. Regional needs identified in the mobility corridor strategies in Chapter 4 of the RTP;~~
  - 3-2. System maps and functional classifications for street design, motor vehicles, transit, bicycles, pedestrians and freight in Chapter 2 of the RTP; and
  - 4-3. Regional non-SOV modal targets in Table 3.08-1 and the Deficiency Thresholds and Operating Standards in Table 3.08-2.
- C. When determining its transportation needs under this section, a city or county shall consider the regional needs

identified in the mobility corridor strategies in Chapter 4 of the RTP.

### 3.08.220 Transportation Solutions

- A. Each city and county shall consider the following strategies, in the order listed, to meet the transportation needs determined pursuant to section 3.08.210 and performance targets and standards pursuant to section 3.08.230. The city or county shall explain its choice of one or more of the strategies and why other strategies were not chosen:
1. TSMO ~~investments that refine or implement regional strategies in the RTP, including localized TDM, safety, operational and access management improvements~~;
  2. Transit, bicycle and pedestrian system improvements;
  3. Traffic-calming designs and devices;
  4. Land use strategies ~~in OAR 660-012-0035(2)~~ to help achieve the thresholds and standards in Tables 3.08-1 and 3.08-2 or alternative thresholds and standards established pursuant to section 3.08.230;
  5. Connectivity ~~improvements to provide~~ parallel arterials, collectors or local streets, ~~including that include~~ pedestrian and bicycle facilities, consistent with the connectivity standards in section 3.08.110 and design classifications in Section 2.5.1 Table 2.6 of the RTP, in order to provide alternative routes ~~or~~ and encourage use of modes other than SOV walking, biking and access to transit; and
  6. Motor vehicle capacity improvements, consistent with the RTP Arterial and Throughway Design and Network Concepts in Table 2.6 and Section 2.5.2 of the RTP, only upon a demonstration that other strategies in this subsection are not appropriate or cannot adequately address identified transportation needs.
- B. A city or county shall coordinate its consideration of the strategies in subsection A with the owner of the transportation facility affected by the strategy. Facility design is subject to the approval of the facility owner.



- C. If analysis under subsection 3.08.210A indicates an ~~unmet~~ new regional or state need that has not been ~~addressed~~ identified in the RTP, the city or ~~county shall~~ may propose one of the following actions:
1. Propose a project at the time of Metro review of the RTP to be incorporated into the RTP during the next RTP update; or
  2. Propose an amendment to the RTP for needs and projects if the amendment is necessary prior to the next RTP update.

~~C. Upon its conclusion that the strategies in subsection A would not be feasible to address identified needs, a city or county shall, in coordination with Metro, pursue one or more of the following strategies:~~

~~0. Amend the comprehensive plan or land use regulations for an area to reduce trips generated by allowed uses;~~

~~0. Take an exception to the relevant RTP requirement pursuant to section 3.08.630;~~

~~0. Change the RTP functional classification of a facility for any mode in Chapter 2 of the RTP; or~~

~~0. Amend the policy in the RTP which the relevant RTP requirement implements.~~

### 3.08.230 Performance Targets and Standards

- A. Each city and county shall demonstrate that solutions adopted pursuant to section 3.08.220 will achieve progress toward the targets and standards in Tables 3.08-1, and 3.08-2 and measures in subsection D, or toward alternative targets and standards adopted by the city or county pursuant to subsections B and, C. The city or county shall include the regional targets and standards or its alternatives in its TSP.
- B. A city or county may adopt alternative targets or standards in place of the regional targets and standards prescribed in subsection A upon a demonstration that the alternative targets or standards:

1. Are no lower than ~~these~~ the modal targets in Table 3.08-1 and no lower than the ratios in Table 3.08-2;
  2. Will not result in a need for motor vehicle capacity improvements that go beyond the planned arterial and throughway network defined in Figure 2.12 of the RTP and that are not recommended in, or are inconsistent with, the RTP; and
  3. Will not increase SOV travel to a degree inconsistent with the non-SOV modal targets in Table 3.08-1.
- C. If the city or county adopts mobility standards for state highways different from those in Table 3.08-2, it shall demonstrate that the standards have been approved by the Oregon Transportation Commission.
- D. Each city and county shall also include performance measures for safety, vehicle miles traveled per capita, freight reliability, congestion, and walking, bicycling and transit mode shares to evaluate and monitor performance of the TSP.
- E. To demonstrate progress toward achievement of performance targets in Tables 3.08-1 and 3.08-2 and to ~~maintain~~ improve performance of state highways within its jurisdiction as much as feasible and avoid their further degradation, the city or county shall adopt the following:
1. Parking minimum and maximum ratios in Centers and Station Communities consistent with subsection 3.08.410A;
  2. Designs for street, transit, bicycle, freight and pedestrian systems consistent with Title 1; and
  3. TSMO projects and strategies consistent with section 3.08.160; and
  4. Land use actions pursuant to OAR 660-012-0035(2).

**TITLE 3: TRANSPORTATION PROJECT DEVELOPMENT**

3.08.310 Defining Projects in Transportation System Plans

- A. Each city or county developing or amending a TSP shall specify the general locations and facility parameters, such as minimum and maximum ROW dimensions and the number and ~~size~~width of traffic lanes, of planned regional transportation facilities and improvements identified on the appropriate RTP map. The locations shall be within the general location depicted in the appropriate RTP map. Except as otherwise provided in the TSP, the general location is as follows:
1. For new facilities, a corridor within 200 feet of the location depicted on the appropriate RTP map;
  2. For interchanges, the general location of the crossing roadways, without specifying the general location of connecting ramps;
  3. For existing facilities planned for improvements, a corridor within 50 feet of the existing right-of-way; and
  4. For realignments of existing facilities, a corridor within 200 feet of the segment to be realigned as measured from the existing right-of-way depicted on the appropriate RTP map.
- B. A city or county may refine or revise the general location of a planned regional facility as it prepares or revises its TSP. Such revisions may be appropriate to reduce the impacts of the facility or to comply with comprehensive plan or statewide planning goals. If, in developing or amending its TSP, a city or county determines that the general location of a planned regional facility or improvement is inconsistent with its comprehensive plan or a statewide planning goal requirement, it shall:
1. Propose a revision to the general location of the planned facility or improvement to achieve consistency and, if the revised location lies outside the general location depicted in the appropriate RTP map, seek an amendment to the RTP; or
  2. Propose a revision to its comprehensive plan to authorize the planned facility or improvement at the revised location.

## TITLE 4: REGIONAL PARKING MANAGEMENT

### 3.08.410 Parking Management

- A. Cities and county parking regulations shall establish set minimums and maximums as set forth in this section parking ratios, consistent with the following:
1. No minimum ratios higher than those shown on Table 3.08-3.
  2. No maximums ratios higher than those shown on Table 3.08-3 and illustrated in the Parking Maximum Map. If 20-minute peak hour transit service has become available to an area within a one-quarter mile walking distance for bus transit or one-half mile walking distance from a high capacity transit station, that area shall be added to Zone A. If 20-minute peak hour transit service is no longer available to an area within a one-quarter mile walking distance for bus transit or one-half mile walking distance from a high capacity transit station, that area shall be removed from Zone A. Cities and counties should designate Zone A parking ratios in areas with good pedestrian access to commercial or employment areas (within one-third mile walk) from adjacent residential areas.
- B. Cities and counties may establish a process for variances from minimum and maximum parking ratios that includes criteria for a variance.
- C. Cities and counties shall require that Ffree surface parking shall be subject to the isbe consistent with the regional parking maximums for Zones A and B in Table 3.08-3. Following an adopted exemption process and criteria, cities and counties may exempt parking structures; fleet parking; vehicle parking for sale, lease, or rent; employee car pool parking; dedicated valet parking; user-paid parking; market rate parking; and other high-efficiency parking management alternatives from maximum parking standards. Reductions associated with redevelopment may be done in phases. Where mixed-use development is proposed, cities and counties shall provide for blended parking rates. Cities and counties may count adjacent on-street parking spaces, nearby public parking and shared parking toward required parking minimum standards.

- D. Cities and counties may use categories or standards other than those in Table 3.08-3 upon demonstration that the effect will be substantially the same as the application of the ratios in the table.
- E. Cities and counties shall provide for the designation of residential parking districts in local comprehensive plans or implementing ordinances.
- F. Cities and counties shall require that parking lots more than three acres in size provide street-like features ~~along major driveways~~, including curbs, sidewalks and street trees or planting strips. Major driveways in new residential and mixed-use areas shall meet the connectivity standards for full street connections in section 3.08.110, and should line up with surrounding streets except where prevented by topography, rail lines, freeways, pre-existing development or leases, easements or covenants that existed prior to May 1, 1995, or the requirements of Titles 3 and 13 of the UGMFP.
- G. To support local freight delivery activities, cities and counties shall require on-street freight loading and unloading areas at appropriate locations in centers.
- H. To encourage the use of bicycles and ensure adequate bicycle parking for different land uses, cities and counties shall establish short-term (stays of less than four hours) and long-term (stays of more than four hours and all-day/monthly) bicycle parking minimums for:
  - 1. New multi-family residential developments of four units or more;
  - 2. New retail, office and institutional developments;
  - 3. Transit centers, high capacity transit stations, inter-city bus and rail passenger terminals; and
  - 4. Bicycle facilities at transit stops and park-and-ride lots.
- I. Cities and counties shall adopt parking policies, management plans and regulations for Centers and Station Communities. The policies, plans and regulations shall be consistent with subsection A through H. Plans may be adopted in TSPs or other adopted policy documents and may

focus on sub-areas of Centers. Plans shall include an inventory of parking supply and usage, an evaluation of bicycle parking needs with consideration of *TriMet Bicycle Parking Guidelines*. Policies shall be adopted in the TSP. Policies, plans and regulations must consider and may include the following range of strategies:

1. By-right exemptions from minimum parking requirements;
2. Parking districts;
3. Shared parking;
4. Structured parking;
5. Bicycle parking;
6. Timed parking;
7. Differentiation between employee parking and parking for customers, visitors and patients;
8. Real-time parking information;
9. Priced parking;
10. Parking enforcement.

## **TITLE 5: AMENDMENT OF COMPREHENSIVE PLANS**

### 3.08.510 Amendments of City and County Comprehensive and Transportation System Plans

- A. When a city or county proposes to amend its comprehensive plan or its components, it shall consider the strategies in subsection 3.08.220A as part of the analysis required by OAR 660-012-0060.
- B. If a city or county adopts the actions set forth in subsection 3.08.230E and section \_\_\_\_\_ of Title 6 of the UGMFP, it shall be eligible for an automatic reduction of 30 percent below the vehicular trip generation rates recommended by the Institute of Transportation Engineers when analyzing the traffic impacts, pursuant to OAR 660-012-0060, of a plan amendment in a Center, Main Street, Corridor or Station Community.

- C. If a city or county proposes a transportation project that is not included in the RTP and will result in a significant increase in SOV capacity or exceeds the planned function or capacity of a facility designated in the RTP, it shall demonstrate ~~consideration of~~consistency with the following ~~as part of~~in its project analysis:
1. The strategies set forth in subsection 3.08.220A 1 through 5;
  2. Complete street designs adopted pursuant to subsection 3.08.110A and as set forth in *Creating Livable Streets: Street Design Guidelines for 2040* (2<sup>nd</sup> Edition, 2002) or similar resources consistent with regional street design policies; and
  3. Green street designs adopted pursuant to subsection 3.08.110A and as set forth in *Green Streets: Innovative Solutions for Stormwater and Street Crossings* (2002) and *Trees for Green Streets: An Illustrated Guide* (2002) or similar resources consistent with federal regulations for stream protection.
- D. If the city or county decides not to build a project identified in the RTP, it shall identify alternative projects or strategies to address the identified transportation need and inform Metro so that Metro can amend the RTP.
- E. This section does not apply to city or county transportation projects that are financed locally and would be undertaken on local facilities.

## **TITLE 6: COMPLIANCE PROCEDURES**

### 3.08.610 Metro Review of Amendments to Transportation System Plans

- A. Cities and counties shall update or amend their TSPs to comply with the RTFP, or an amendment to it, within two years after acknowledgement of the RTFP, or an amendment to it or by a later date specified in the ordinance that amends the RTFP. The COO shall notify cities and counties of the dates by which their TSPs must comply.

- B. Cities and counties that update or amend their TSPs after acknowledgment of the RTFP or an amendment to it, but before two years following its acknowledgment, shall make the amendments in compliance with the RTFP or the amendment. The COO shall notify cities and counties of the date of acknowledgment of the RTFP or an amendment to it.
- C. One year following acknowledgment of the RTFP or an amendment to it, cities and counties whose TSPs do not yet comply with the RTFP or the amendment shall make land use decisions consistent with the RTFP or the amendment. The COO, at least 120 days before the specified date, shall notify cities and counties of the date upon which RTFP requirements become applicable to land use decisions. The notice shall specify which requirements become applicable to land use decisions in each city and county.
- D. An amendment to a city or county TSP shall be deemed to comply with the RTFP ~~if no appeal to the Land Use Board of Appeals is made within the 21 day period set forth in ORS 197.830(9), or if an appeal is made and the amendment is affirmed by~~ upon the expiration of the appropriate appeal period specified in ORS 197.830 or 197.650 or, if an appeal is made, upon the final decision on appeal. Once the amendment is deemed to comply with the RTFP, the RTFP shall no longer apply directly to city or county land use decisions.
- E. An amendment to a city or county TSP shall be deemed to comply with the RTFP as provided in subsection D only if the city or county provided notice to the COO as required by subsection F.
- F. At least 45 days prior to the first public hearing on a proposed amendment to a TSP, the city or county shall submit the proposed amendment to the COO. The COO may request, and if so the city or county shall submit, an analysis of compliance of the amendment with the RTFP. Within four weeks after receipt of the notice, the COO shall submit to the city or county a written analysis of compliance of the proposed amendment with the RTFP, including recommendations, if any, that would bring the amendment into compliance with the RTFP. The COO shall send a copy of its analysis to those persons who have requested a copy.



- G. If the COO concludes that the proposed amendment does not comply with RTFP, the COO shall advise the city or county that it may:
1. Revise the proposed amendment as recommended in the COO's analysis;
  2. Seek an extension of time, pursuant to section 3.08.620, to bring the proposed amendment into compliance;
  3. Seek an exception to the requirement, pursuant to section 3.08.630; or
  4. Seek review of the noncompliance by ~~JPACT and the Metro Council, pursuant to subsections H and I of this section.~~

~~G. The city or county may postpone further consideration of the proposed amendment and seek JPACT review of the COO's analysis under subsection F within 21 days from the date it received the COO's analysis. JPACT shall schedule the matter for presentations by the city or county and the COO at the earliest available time. At the conclusion of the presentations, JPACT, by a majority of a quorum, shall decide whether it agrees or disagrees with the COO's analysis and shall provide a brief written explanation as soon as practicable.~~

H. A city or county may postpone further consideration of the proposed amendment and seek review of the COO's analysis by the Metro Council. If a city or county seeks such review, the Council shall schedule the review at the earliest convenient time. At the conclusion of the review, the Council shall decide whether it agrees or disagrees with the COO's analysis and provide a written explanation as soon as practicable.

~~H. The city or county may seek review of JPACT's decision by the Metro Council within 10 days from the date of JPACT's written explanation. The Council shall schedule the matter for presentations by the city or county and the COO at the earliest available time. At the conclusion of the presentations, the Council shall decide whether it agrees or disagrees with JPACT's decision and shall provide a brief written explanation as soon as practicable.~~

J-I. A city or county that adopts an amendment to its TSP shall send a printed or electronic copy of the ordinance making the amendment to the COO within 14 days after its adoption.

### 3.08.620 Extension of Compliance Deadline

- A. A city or county may seek an extension of time for compliance with the RTFP by filing an application on a form provided by the COO. Upon receipt of an application, the Council President shall set the matter for a public hearing before the Metro Council and shall notify the city or county, ~~JPACT,~~ the Department of Land Conservation and Development (DLCD) and those persons who request notification of applications for extensions.
- B. The Council shall hold a public hearing to consider the application. Any person may testify at the hearing. The Council may grant an extension if it finds that:
  - 1. The city or county is making progress toward compliance with the RTFP; or
  - 2. There is good cause for failure to meet the compliance deadline.
- C. The Council may establish terms and conditions for an extension in order to ensure that compliance is achieved in a timely and orderly fashion and that land use decisions made by the city or county during the extension do not undermine the ability of the city or county to achieve the purposes of the RTFP requirement. A term or condition must relate to the requirement of the RTFP for which the Council grants the extension. The Council shall not grant more than two extensions of time, nor grant an extension of time for more than one year.
- D. The Council shall issue an order with its conclusion and analysis and send a copy to the city or county, ~~JPACT,~~ the DLCD and any person who participated in the proceeding. The city or county or a person who participated in the proceeding may seek review of the Council's order as a land use decision described in ORS 197.015(10) (a) (A).

### 3.08.630 Exception from Compliance

- A. A city or county may seek an exception from compliance with a requirement of the RTFP by filing an application on a

form provided by the COO. Upon receipt of an application, the Council President shall set the matter for a public hearing before the Metro Council and shall notify ~~JPACT~~, the DLCDC and those persons who request notification of requests for exceptions.

C. Following the public hearing on the application, the Metro Council may grant an exception if it finds:

1. It is not possible to achieve the requirement due to topographic or other physical constraints or an existing development pattern;
2. This exception and likely similar exceptions will not render the objective of the requirement unachievable region-wide;
3. The exception will not reduce the ability of another city or county to comply with the requirement; and
4. The city or county has adopted other measures more appropriate for the city or county to achieve the intended result of the requirement.

C. The Council may establish terms and conditions for the exception in order to ensure that it does not undermine the ability of the region to achieve the policies of the RTP. A term or condition must relate to the requirement of the RTFP to which the Council grants the exception.

D. The Council shall issue an order with its conclusion and analysis and send a copy to the city or county, ~~JPACT~~, the DLCDC and those persons who have requested a copy of the order. The city or county or a person who participated in the proceeding may seek review of the Council's order as a land use decision described in ORS 197.015(10) (a) (A).

## **TITLE 7: DEFINITIONS**

### 3.08.710 Definitions

For the purpose of this functional plan, the following definitions shall apply:

- A. "Accessibility" means the ease of access and the amount of time required to reach a given location or service by any mode of travel.

B. "Accessway" means right-of-way or easement designed for public access by bicycles and pedestrians, and may include emergency vehicle passage.

~~B. "Alternative modes" means alternative methods of travel to the automobile, including public transportation (light rail, bus and other forms of public transportation), bicycles and walking.~~

~~D.C.~~ "At a major transit stop" means a parcel or ownership ~~which~~ that is adjacent to or includes a major transit stop, generally including portions of such parcels or ownerships that are within 200 feet of a major transit stop.

~~E.D.~~ "Bikeway" means separated bike paths, striped bike lanes, or wide outside lanes that accommodate bicycles and motor vehicles.

~~F.E.~~ "Boulevard design" means a design concept that emphasizes pedestrian travel, bicycling and the use of public transportation, and accommodates motor vehicle travel.

~~G.F.~~ "Capacity expansion" means constructed or operational improvements to the regional motor vehicle system that increase the capacity of the system.

~~H.G.~~ "Chicane" means a movable or permanent barrier used to create extra turns in a roadway to reduce motor vehicle speeds or to prevent cars from driving across a pedestrian or bicycle accessway.

~~I.H.~~ "Connectivity" means the degree to which the local and regional street, pedestrian, bicycle, transit and freight systems in a given area are interconnected.

~~J.I.~~ "Complete Streets" means streets that are designed to serve all modes of travel, including bicycles, freight delivery vehicles, transit vehicles and pedestrians of all ages and abilities.

~~K.J.~~ "COO" means Metro's Chief Operating Officer or the COO's designee.

~~L.K.~~ "DLCD" means the Oregon state agency under the direction of the Land Conservation and Development Commission.

M-L. "Deficiency" means a performance capacity, design or operations operational constraint that limits, ~~but does not prohibit the ability to~~ travel by a given mode ~~or meet standards and targets in Tables 3.08-1 and 3.08-2.~~

Examples of deficiencies may include unsafe designs, bicycle and pedestrian connections that contain obstacles (e.g., missing ADA-compliant curb ramps, distances greater than 330 feet between pedestrian crossings), transit overcrowding or inadequate frequency; and throughways ~~portions~~ with less than six through lanes of capacity; arterials ~~portions~~ with less than four through lanes ~~of capacity~~ that do not meet the standards in Table 3.08-2. ~~arterial streets with substandard design features; at grade rail crossings; height restrictions; bicycle and pedestrian connections that contain obstacles (e.g., missing curb ramps); distances greater than 330 feet between pedestrian crossings; absence of pedestrian refuges; sidewalks occluded by utility infrastructure; high traffic volumes; complex traffic environments; transit overcrowding or schedule unreliability; and high crash locations.~~

N-M. "Design type" means the conceptual areas depicted on the Metro 2040 Growth Concept Map and described in the RFP including Central City, Regional Center, Town Center, Station Community, Corridor, Main Street, Inner Neighborhood, Outer Neighborhood, Regionally Significant Industrial Area, Industrial Area and Employment Area.

O-N. "Essential destinations" ~~means includes such places as~~ hospitals, medical centers, ~~pharmacies, shopping centers, grocery stores, colleges, universities, middle schools and high schools, parks and open spaces, and~~ social service centers with more than 200 monthly LIFT pick-ups, ~~employers with more than 1,500 employees, sports and entertainment venues and major government offices.~~

P-O. "Full street connection" means right-of-way designed for public access by motor vehicles, pedestrians and bicycles.

Q-P. "Gap" means a missing link or barrier in the "typical" urban transportation system for any mode that functionally prohibits travel where a connection might be expected to occur in accordance with the system concepts and networks in Chapter 2 of the RTP. There is a gap when a connection does not exist. But a gap also exists if a physical barrier, such as a throughway, natural feature, weight

limits on a bridge or existing development, interrupts a system connection.

R.Q. "Growth Concept Map" means the conceptual map depicting the 2040 Growth Concept design types described in the RFP.

S.R. "High capacity transit" means the ability to bypass traffic and avoid delay by operating in exclusive or semi-exclusive rights of way, faster overall travel speeds due to wide station spacing, frequent service, transit priority street and signal treatments, and premium station and passenger amenities. Speed and schedule reliability are preserved using transit signal priority at at-grade crossings and/or intersections. High levels of passenger infrastructure are provided at transit stations and station communities, including real-time schedule information, ticket machines, special lighting, benches, shelters, bicycle parking, and commercial services. The transit modes most commonly associated with high capacity transit include:

- light rail transit, light rail trains operating in exclusive or semi-exclusive right of way<sup>1</sup>
- bus rapid transit, regular or advanced bus vehicles operating primarily in exclusive or semi-exclusive right of way
- rapid streetcar, streetcar trains operating primarily in exclusive or semi-exclusive right of way
- commuter rail, heavy rail passenger trains operating on exclusive, semi-exclusive or nonexclusive (with freight) railroad tracks

T.S. "Improved pedestrian crossing" means a marked pedestrian crossing and may include signage, signalization, curb extensions and a pedestrian refuge such as a landscaped median.

U.T. "Institutional uses" means colleges and universities, hospitals and major government offices.

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<sup>1</sup> Exclusive right of way, as defined by Transportation Research Board TCRP report 17, includes fully grade - separated right of way. Semi-exclusive right of way includes separate and shared rights of way as well light rail and pedestrian malls adjacent to a parallel roadway. Nonexclusive right of way includes operations in mixed traffic, transit mall and a light rail/pedestrian mall.

~~T. "JPACT" means the Joint Policy Advisory Committee on Transportation, composed of elected officials and agency representatives involved, that makes recommendations to the Metro Council on transportation planning and projects.~~

~~W-U.~~ "Landscape strip" means the portion of public right-of-way located between the sidewalk and curb.

~~X-V.~~ "Land use decision" shall have the meaning of that term set forth in ORS 197.015(10).

~~Y-W.~~ "Land use regulation" means any local government zoning ordinance, land division ordinance adopted under ORS 92.044 or 92.046 or similar general ordinance establishing standards for implementing a comprehensive plan, as defined in ORS 197.015.

~~Z-X.~~ "Level-of-service (LOS)" means the ratio of the volume of motor vehicle demand to the capacity of the motor vehicle system during a specific increment of time.

~~AA-Y.~~ "Local trips" means trips that are five miles or shorter in length.

~~BB-Z.~~ "Low-income families" means a household who earned between 0 and 1.99 times the federal Poverty level ~~in 199as defined in the most recently available U.S. Census.~~

~~CC-AA.~~ "Low-income populations" means any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed or transient persons (such as migrant workers or Native Americans) who would be similarly affected by a TSP.

~~BB.~~ "Major Bus Stops" include most Frequent Service bus stops, most transfer locations between bus lines (especially when at least one of the bus lines is a frequent service line), stops at major ridership generators (e.g., schools, hospitals, concentrations of shopping, or high density employment or employment), and other high ridership bus stops. These stops may include shelters, lighting, seating, bicycle parking, or other passenger amenities and are intended to be highly accessible to adjacent buildings while providing for quick and efficient bus service. Major bus stop locations are designated in Figure 2.15 of the RTP.

DD-CC. "Major driveway" means a driveway that:

1. Intersects with a public street that is controlled, or is to be controlled in the planning period, by a traffic signal;
2. Intersects with an existing or planned arterial or collector street; or
3. Would be an extension of an existing or planned local street, or of another major driveway.

EE-DD. "Major transit stop" means transit centers, high capacity transit stations, major bus stops, inter-city bus passenger terminals, inter-city rail passenger terminals and bike-transit facility as defined in Figure 2.15 of the Regional Transportation Plan.

FF-EE. "Median" means the center portion of public right-of-way, located between opposing directions of motor vehicle travel lanes. A median is usually raised and may be landscaped, and usually incorporates left turn lanes for motor vehicles at intersections and major access points.

GG-FF. "Metro" means the regional government of the metropolitan area, the elected Metro Council as the policy-setting body of the government.

HH-GG. "Metro boundary" means the jurisdictional boundary of Metro, the elected regional government of the metropolitan area.

II-HH. "Minority" means a person who is:

1. Black (having origins in any of the black racial groups of Africa);
2. Hispanic (of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race);
3. Asian American (having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent or the Pacific Islands);
4. American Indian and Alaska Native (having origins in any of the original peoples of North American and who



maintain cultural identification through tribal affiliation or community recognition); or

5. Native Hawaiian or Other Pacific Islander (having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands).

JJ-II. "Minority population" means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed or transient persons (such as migrant workers or Native Americans) who would be similarly affected by a TSP.

KK-JJ. "Mixed-use development" includes areas of a mix of at least two of the following land uses and includes multiple tenants or ownerships: residential, retail and office. This definition excludes large, single-use land uses such as colleges, hospitals, and business campuses. Minor incidental land uses that are accessory to the primary land use should not result in a development being designated as "mixed-use development." The size and definition of minor incidental, accessory land uses allowed within large, single-use developments should be determined by cities and counties through their comprehensive plans and implementing ordinances.

HH-KK. "Mobility" means the speed at which a given mode of travel operates in a specific location.

MM-LL. "Mode-split target" means the individual percentage of public transportation, pedestrian, bicycle and shared-ride trips expressed as a share of total person-trips.

NN-MM. "Motor vehicle" means automobiles, vans, public and private buses, trucks and semi-trucks, motorcycles and mopeds.

OO-NN. "Motor vehicle level-of-service" means a measurement of congestion as a share of designed motor vehicle capacity of a road.

PP-OO. "Multi-modal" means transportation facilities or programs designed to serve many or all methods of travel, including all forms of motor vehicles, public transportation, bicycles and walking.

QQ-PP. "Narrow street design" means streets with less than 46 feet of total right-of-way and no more than 28 feet of pavement width between curbs.

RR-QQ. "Near a major transit stop" means a parcel or ownership that is within 300 feet of a major transit stop.

SS-RR. "Non-SOV modal target" means a target for the percentage of total trips made in a defined area by means other than a private passenger vehicles carrying one occupant.

TT-SS. "Performance measure" means a measurement derived from technical analysis aimed at determining whether a planning policy is achieving the expected outcome or intent associated with the policy.

UU-TT. "Person-trips" means the total number of discrete trips by individuals using any mode of travel.

UU. "Principal arterial" means limited-access roads that serve longer-distance motor vehicle and freight trips and provide interstate, intrastate and cross-regional travel. See definition of Throughway.

VV. "Refinement plan" means an amendment to a transportation system plan which determines at a systems level the function, mode or general location of a transportation facility, service or improvement, deferred during system planning because detailed information needed to make the determination could not be reasonably obtained at that time.

WW. "Regional vehicle trips" are trips that are greater than five miles in length.

XX. "Residential Parking District" is a designation intended to protect residential areas from spillover parking generated by adjacent commercial, employment or mixed use areas, or other uses that generate a high demand for parking.

YY. "RFP" means Metro's Regional Framework Plan adopted pursuant to ORS chapter 268.

ZZ. "Routine repair and maintenance" means activities directed at preserving an existing allowed use or facility, without expanding the development footprint or site use.

- AAA. "RTFP" means this Regional Transportation Functional Plan.
- BBB. "Shared-ride" means private passenger vehicles carrying more than one occupant.
- CCC. "Significant increase in Single Occupancy Vehicle (SOV) capacity for multi-modal arterials" means an increase in SOV capacity created by the construction of additional general purpose lanes totaling 1/2 lane miles or more in length. General purpose lanes are defined as through travel lanes or multiple turn lanes. This also includes the construction of a new general purpose arterial facility on a new location. Lane tapers are not included as part of the general purpose lane. An increase in SOV capacity associated with a safety project is considered significant only if the safety deficiency is totally related to traffic congestion. Significant increases in SOV capacity should be assessed for individual facilities rather than for the planning area.
- DDD. "Significant increase in Single Occupancy Vehicle (SOV) capacity for regional through-route freeways" means an increase in SOV capacity created by the construction of additional general purpose lanes other than that resulting from a safety project or a project solely intended to eliminate a bottleneck. An increase in SOV capacity associated with the elimination of a bottleneck is considered significant only if such an increase provides a highway section SOV capacity greater than ten percent over that provided immediately upstream of the bottleneck. An increase in SOV capacity associated with a safety project is considered significant only if the safety deficiency is totally related to traffic congestion. Construction of a new general purpose highway facility on a new location also constitutes a significant increase in SOV capacity. Significant increase in SOV capacity should be assessed for individual facilities rather than for the planning area.
- EEE. "SOV" means a private motorized passenger vehicle carrying one occupant (single-occupancy vehicle).
- FFF. "Substantial compliance" means city and county comprehensive plans and implementing ordinances, on the whole, conform with the purposes of the performance standards in the functional plan and any failure to meet

individual performance standard requirements is technical or minor in nature.

GGG. "Throughway" means limited-access ~~facilities~~~~roads~~ that serve longer-distance motor vehicle and freight trips and provide interstate, intrastate and cross-regional travel. See definition for principal arterial.

HHH. "TPR" means the administrative rule entitles Transportation Planning Rule adopted by the Land Conservation and Development to implement statewide planning Goal 12, Transportation.

III. "Traffic calming" means street design or operational features intended to maintain ~~a given low~~ motor vehicle travel speed to enhance safety for pedestrians, other non-motorized modes and adjacent land uses.

JJJ. "Transportation system management and operations" (TSMO) means ~~programs and strategies that will allow the region to more effectively and efficiently manage existing and new multi-modal transportation facilities and services to preserve capacity and improve safety, security and reliability.~~ TSMO has two components: (1) transportation system management, which focuses on making facilities better serve users by improving efficiency, safety and capacity; and (2) transportation demand management, which seeks to modify travel behavior in order to make more efficient use of facilities and services and enable users to take advantage of everything the transportation system offers.

KKK. "TriMet" means the regional service district that provides public mass transit to the region.

LLL. "TSP" means a transportation system plan adopted by a city or county.

MMM. "UGB" means an urban growth boundary adopted pursuant to ORS 268.390(3).

NNN. "Update" means TSP amendments that change the planning horizon and apply broadly to a city or county and typically entails changes that need to be considered in the context of the entire TSP, or a substantial geographic area.

000. "Woonerf" means a street or group of streets on which pedestrians and bicyclists have legal priority over motor vehicles.

**Table 3.08-1**

**Regional Non-SOV Modal Targets (share of average daily weekday trips for the year 2035)**

2040 Design Type	Non-drive alone modal target
Portland central city	60-70%
Regional centers Town centers Main streets Station communities Corridors Passenger intermodal facilities	45-55%
Industrial areas Freight intermodal facilities Employment areas Inner neighborhoods Outer neighborhoods	40-45%

**Table 3.08-2**  
**Interim Regional Mobility Policy**  
 Deficiency Thresholds and Operating Standards

Location	Standard	Standard	
		PM 2-Hour Peak <sup>A</sup>	
	Mid-Day One-Hour Peak <sup>A</sup>	1st Hour	2nd Hour
Central City Regional Centers Town Centers Main Streets Station Communities	.99	1.1	.99
Corridors Industrial Areas Intermodal Facilities Employment Areas Inner Neighborhoods Outer Neighborhoods	.90	.99	.99
I-84 (from I-5 to I-205)	.99	1.1	.99
I-5 North (from Marquam Bridge to Interstate Bridge)	.99	1.1	.99
OR 99E (from Lincoln Street to OR 224 interchange)	.99	1.1	.99
US 26 (from I-405 to Sylvan interchange)	.99	1.1	.99
I-405 <sup>B</sup> (I-5 South to I-5 North)	.99	1.1	.99
Other Principal Arterial Routes I-205 <sup>B</sup> I-84 (east of I-205) I-5 (Marquam Bridge to Wilsonville) <sup>B</sup> OR 217 US 26 (west of Sylvan) US 30 OR 8 (Murray Boulevard to Brookwood Avenue) <sup>B</sup> OR 212 OR 224 OR 47 OR 213	.90	.99	.99

- A. The ~~volumedemand~~-to-capacity ratios in the table are for the highest two consecutive hours of weekday traffic volumes. The mid-day peak hour as the highest 60-minute period between the hours of 9 a.m. and 3 p.m. The 2<sup>nd</sup> hour is defined as the single 60-minute period either before or after the peak 60-minute period, whichever is highest.
- B. ~~Thresholds shown are for interim purposes only; a~~ corridor refinement plan ~~for these corridors~~ is required in Chapter 6 of the RTP, and will include a recommended mobility policy for each corridor.

<b>Table 3.08-3 - Regional Parking Ratios</b>			
(parking ratios are based on spaces per 1,000 sq. ft of gross leasable area unless otherwise stated)			
Land Use	Minimum Parking Requirements (See Central City Transportation Management Plan for downtown Portland stds)	Maximum Permitted Parking - Zone A:	Maximum Permitted Parking Ratios - Zone B:
	Requirements May Not Exceed	Transit and Pedestrian Accessible Areas <sup>1</sup>	Rest of Region
General Office (includes Office Park, "Flex-Space", Government Office & misc. Services) (gsf)	2.7	3.4	4.1
Light Industrial Industrial Park Manufacturing (gsf)	1.6	None	None
Warehouse (gross square feet; parking ratios apply to warehouses 150,000 gsf or greater)	0.3	0.4	0.5
Schools: College/ University & High School (spaces/# of students and staff)	0.2	0.3	0.3
Tennis Racquetball Court	1.0	1.3	1.5
Sports Club/Recreation Facilities	4.3	5.4	6.5
Retail/Commercial, including shopping centers	4.1	5.1	6.2
Bank with Drive-In	4.3	5.4	6.5
Movie Theater (spaces/number of seats)	0.3	0.4	0.5
Fast Food with Drive Thru	9.9	12.4	14.9
Other Restaurants	15.3	19.1	23
Place of Worship (spaces/seats)	0.5	0.6	0.8
Medical/Dental Clinic	3.9	4.9	5.9
<b>Residential Uses</b>			
Hotel/Motel	1	none	none
Single Family Detached	1	none	none
Residential unit, less than 500 square feet per unit, one bedroom	1	none	none
Multi-family, townhouse, one bedroom	1.25	none	none
Multi-family, townhouse, two bedroom	1.5	none	none
Multi-family, townhouse, three bedroom	1.75	none	none

<sup>1</sup> Ratios for uses not included in this table would be determined by cities and counties. In the event that a local government proposes a different measure, for example, spaces per seating area for a restaurant instead of gross leasable area, Metro may grant approval upon a demonstration by the local government that the parking space requirement is substantially similar to the regional standard.

Table 3.08-4

**Work Plan for Updates to Local Transportation System Plans**

<u>Jurisdiction</u>	<u>Adoption year of last TSP update</u>	<u>RTFP COMPLIANCE DEADLINE</u> <sup>A</sup>		
		<u>2011</u>	<u>2012</u>	<u>2013</u>
<u>Beaverton</u> <sup>B</sup>	<u>2003</u>	<u>•</u>		
<u>Clackamas County</u>	<u>2001</u>		<u>•</u>	
<u>Cornelius</u>	<u>2005</u>			<u>•</u>
<u>Damascus</u>	<u>n/a</u>	<u>•</u>		
<u>Durham</u> <sup>C</sup>	<u>2004</u>			<u>•</u>
<u>Fairview</u>	<u>2000</u>		<u>•</u>	
<u>Forest Grove</u> <sup>B</sup>	<u>1999</u>			<u>•</u>
<u>Gladstone</u>	<u>1995</u>			<u>•</u>
<u>Gresham</u>	<u>2002</u>		<u>•</u>	
<u>Happy Valley</u>	<u>2009</u>		<u>•</u>	
<u>Hillsboro</u>	<u>2004</u>			<u>•</u>
<u>Johnson City</u> <sup>C</sup>	<u>unknown</u>			<u>•</u>
<u>King City</u>	<u>unknown</u>	<u>Metro supports an exemption from TSP requirements</u>		
<u>Lake Oswego</u> <sup>D</sup>	<u>1997</u>		<u>•</u>	
<u>Maywood Park</u>	<u>n/a</u>	<u>Metro supports an exemption from TSP requirements</u>		
<u>Milwaukie</u>	<u>2007</u>		<u>•</u>	
<u>Multnomah County</u>	<u>2006</u>	<u>•</u>		
<u>Oregon City</u> <sup>D</sup>	<u>2001</u>		<u>•</u>	
<u>Portland</u>	<u>2007</u>			<u>•</u>
<u>Rivergrove</u> <sup>C</sup>	<u>unknown</u>			<u>•</u>
<u>Sherwood</u>	<u>2005</u>		<u>•</u>	
<u>Tigard</u> <sup>B</sup>	<u>2002</u>	<u>•</u>		
<u>Troutdale</u>	<u>2005</u>	<u>•</u>		
<u>Tualatin</u>	<u>2001</u>		<u>•</u>	
<u>West Linn</u>	<u>2008</u>		<u>•</u>	
<u>Wilsonville</u> <sup>D</sup>	<u>2003</u>		<u>•</u>	
<u>Washington County</u>	<u>2002</u>		<u>•</u>	
<u>Wood Village</u>	<u>1999</u>	<u>•</u>		



Table Notes:

- A – The compliance deadline is December 31 for the year indicated. The deadline has been developed in consultation with individual jurisdictions and phased to take advantage of funding opportunities and the availability of local and Metro staff resources. A city or county need not update its TSP according to this schedule if it finds, pursuant to OAR 660-012-0016(2)(a), that its current TSP is consistent with the 2035 RTP.
- B – Local adoption of an updated TSP is expected in summer 2010. The compliance deadline is for updates to local implementing regulations, as necessary, to comply with the RTFP.
- C – Compliance is established with adoption of implementing regulations that comply with the RTFP.
- D – The deadline assumes the jurisdiction is awarded state Transportation-Growth Management (TGM) funding for the 2010-11 biennium. If the jurisdiction is not awarded funding, the compliance deadline is December 31, 2013.
- E – The next update to the Regional Transportation Plan is scheduled to occur from June 2012 to June 2014.

## Exhibit F to Ordinance No. 10-1241A

### Exhibit F to Ordinance No. 10-1241

Title 2 of the Urban Growth Management Functional Plan is repealed.

#### ~~TITLE 2: REGIONAL PARKING POLICY~~

##### ~~3.07.210 Intent~~

~~The State's Transportation Planning Rule calls for reductions in vehicle miles traveled per capita and restrictions on construction of new parking spaces as a means of responding to transportation and land use impacts of growth. The Metro 2040 Growth Concept calls for more compact development as a means to encourage more efficient use of land, promote non auto trips and protect air quality. In addition, the federally mandated air quality plan adopted by the state relies on the 2040 Growth Concept fully achieving its transportation objectives. Notably, the air quality plan relies upon reducing vehicle trips per capita and related parking spaces through minimum and maximum parking ratios. This title addresses these state and federal requirements and preserves the quality of life of the region.~~

~~A compact urban form requires that each use of land is carefully considered and that more efficient forms are favored over less efficient ones. Parking, especially that provided in new developments, can result in a less efficient land usage and lower floor to area ratios. Parking also has implications for transportation. In areas where transit is provided or other non-auto modes (walking, biking) are convenient, less parking can be provided and still allow accessibility and mobility for all modes, including autos. Reductions in auto trips when substituted by non auto modes can reduce congestion and increase air quality.~~

##### ~~3.07.220 Performance Standard~~

~~A. Cities and counties are hereby required to amend their comprehensive plans and implementing regulations, if necessary, to meet or exceed the following minimum standards:~~

- ~~1. Cities and counties shall require no more parking than the minimum as shown on Table 3.07-2, Regional Parking Ratios, attached hereto; and~~

## Exhibit F to Ordinance No. 10-1241A

- ~~2. Cities and counties shall establish parking maximums at ratios no greater than those listed in the Regional Parking Ratios Table and as illustrated in the Parking Maximum Map. The designation of A and B zones on the Parking Maximum Map should be reviewed after the completion of the Regional Transportation Plan and every three years thereafter. If 20 minute peak hour transit service has become available to an area within a one-quarter mile walking distance for bus transit or one-half mile walking distance for light rail transit, that area shall be added to Zone A. If 20 minute peak hour transit service is no longer available to an area within a one-quarter mile walking distance for bus transit or one-half mile walking distance for light rail transit, that area shall be removed from Zone A. Cities and counties should designate Zone A parking ratios in areas with good pedestrian access to commercial or employment areas (within 1/3 mile walk) from adjacent residential areas.~~
  
- ~~3. Cities and counties shall establish an administrative or public hearing process for considering ratios for individual or joint developments to allow a variance for parking when a development application is received which may result in approval of construction of parking spaces either in excess of the maximum parking ratios; or less than the minimum parking ratios.~~

~~Cities and counties may grant a variance from any maximum parking ratios through a variance process.~~

- ~~B. Free surface parking spaces shall be subject to the regional parking maximums provided for Zone A and Zone B. Parking spaces in parking structures, fleet parking, parking for vehicles that are for sale, lease, or rent, employee car pool parking spaces, dedicated valet parking spaces, spaces that are user paid, market rate parking or other high efficiency parking management alternatives may be exempted from maximum parking standards by cities and counties. Sites that are proposed for redevelopment may be allowed to phase in reductions as a local option. Where mixed land uses are proposed, cities and counties shall provide for blended parking rates. It is recommended that cities and counties count adjacent on-street parking spaces, nearby public parking and shared parking toward required parking minimum standards.~~

## Exhibit F to Ordinance No. 10-1241A

- ~~C. Cities and counties may use categories or measurement standards other than those in the Regional Parking Ratios Table, but must provide findings that the effect of the local regulations will be substantially the same as the application of the Regional Parking Ratios.~~
- ~~D. Cities and counties shall provide data to Metro on an annual basis that demonstrates compliance with the minimum and maximum parking standards, including the application of any variances to the regional standards in this title. Coordination with Metro collection of other building data should be encouraged.~~
- ~~E. Cities and counties shall provide for the designation of residential parking districts in local comprehensive plans or implementing ordinances.~~
- ~~F. Cities and counties shall amend their comprehensive plans and implementing regulations to require that parking lots more than 3 acres in size provide street like features along major driveways; including curbs, sidewalks, and street trees or planting strips. Major driveways in new residential and mixed use areas shall meet the connectivity standards for full street connections as described in Section 6.4.5 of the 2000 Regional Transportation Plan.~~
- ~~G. Cities and counties shall amend their comprehensive plans and implementing regulations to incorporate the requirements contained in Section 3.07.220(A)-(E) within one year of adoption of the 2000 Regional Transportation Plan.~~

**Exhibit F to Ordinance No. 10-1241A**

<b>Table 3.07-2-- Regional Parking Ratios</b>			
(Section 3.07.220(A)(1))			
(parking ratios are based on spaces per 1,000 sq. ft of gross leasable area unless otherwise stated)			
Land Use	Minimum Parking Requirements (See Central City Transportation Management Plan for downtown Portland stds)	Maximum Permitted Parking --Zone A:	Maximum Permitted Parking Ratios --Zone B:
	Requirements May Not Exceed	Transit and Pedestrian Accessible Areas <sup>†</sup>	Rest of Region
General Office (includes Office Park, "Flex-Space", Government Office & misc. Services) (gsf)	2.7	3.4	4.1
Light Industrial Industrial Park Manufacturing (gsf)	1.6	None	None
Warehouse (gross square feet; parking ratios apply to warehouses 150,000 gsf or greater)	0.3	0.4	0.5
Schools: College/ University & High School (spaces/# of students and staff)	0.2	0.3	0.3
Tennis/Racquetball Court	1.0	1.3	1.5
Sports Club/Recreation Facilities	4.3	5.4	6.5
Retail/Commercial, including shopping centers	4.1	5.1	6.2
Bank with Drive-In	4.3	5.4	6.5
Movie Theater (spaces/number of seats)	0.3	0.4	0.5
Fast Food with Drive Thru	9.9	12.4	14.9
Other Restaurants	15.3	19.1	23
Place of Worship (spaces/seats)	0.5	0.6	0.8
Medical/Dental Clinic	3.9	4.9	5.9
<b>Residential Uses</b>			
Hotel/Motel	1	none	none
Single Family Detached	1	none	none
Residential unit, less than 500 square feet per unit, one bedroom	1	none	none
Multi-family, townhouse, one bedroom	1.25	none	none
Multi-family, townhouse, two bedroom	1.5	none	none
Multi-family, townhouse, three bedroom	1.75	none	none

<sup>†</sup>-Ratios for uses not included in this table would be determined by cities and counties. In the event that a local government proposes a different measure, for example, spaces per seating area for a restaurant instead of gross leasable area, Metro may grant approval upon a demonstration by the local government that the parking space requirement is substantially similar to the regional standard.

# EXHIBIT G TO ORDINANCE NO. 10-1241A

## CHAPTER 2

### REGIONAL FRAMEWORK PLAN

The policies of Chapter 2, Transportation, are amended as follows:

#### **Policies**

~~The following section contains the policies for regional transportation. It should be noted that implementation of these policies is through the Regional Transportation Plan, a Metro functional plan that includes both recommendations and requirements for cities and counties of the region.~~

#### **2.1 — Public Involvement**

~~It is the policy of the Metro Council to:~~

~~2.1.1 — Provide complete information, timely public notice, full public access to key decisions and support broad-based, early and continuing involvement of the public in all aspects of the transportation planning process that is consistent with Metro's adopted local public involvement policy for transportation planning. This includes involving those traditionally under-served by the existing system, those traditionally under-represented in the transportation process, the general public, and local, regional and state jurisdictions that own and operate the region's transportation system.~~

#### **2.2 — Intergovernmental Coordination**

~~It is the policy of the Metro Council to:~~

~~2.2.1 — Coordinate among the local, regional and state jurisdictions that own and operate the region's transportation system to better provide for state and regional transportation needs.~~

#### **2.3 — Urban Form**

~~It is the policy of the Metro Council to:~~

~~2.3.1 — Facilitate implementation of the 2040 Growth Concept with specific strategies that address mobility and accessibility needs and use transportation investments to leverage the 2040 Growth Concept.~~

#### **2.4 — Consistency Between Land Use and Transportation Planning**

~~It is the policy of the Metro Council to:~~

~~2.4.1 — Ensure the identified function, capacity and level of service of transportation facilities are consistent with applicable regional land use and transportation policies as well as the adjacent land use patterns.~~

## EXHIBIT G TO ORDINANCE NO. 10-1241A

### ~~2.5 — Barrier-Free Transportation~~

~~It is the policy of the Metro Council to:~~

~~2.5.1 — Provide access to more and better transportation choices for travel throughout the region and serve special access needs for all people, including youth, elderly and disabled.~~

### ~~2.6 — Interim Job Access and Reverse Commute Policy~~

~~It is the policy of the Metro Council to:~~

~~2.6.1 — Serve the transit and transportation needs of the economically disadvantaged in the region by connecting low income populations with employment areas and related social services.~~

### ~~2.7 — Transportation Safety and Education~~

~~It is the policy of the Metro Council to:~~

~~2.7.1 — Improve the safety of the transportation system. Encourage bicyclists, motorists and pedestrians to share the road safely.~~

### ~~2.8 — The Natural Environment~~

~~It is the policy of the Metro Council to:~~

~~2.8.1 — Protect the region's natural environment.~~

### ~~2.9 — Water Quality~~

~~It is the policy of the Metro Council to:~~

~~2.9.1 — Protect the region's water quality.~~

### ~~2.10 — Clean Air~~

~~It is the policy of the Metro Council to:~~

~~2.10.1 — Protect and enhance air quality so that as growth occurs, human health and visibility of the Cascades and the Coast Range from within the region is maintained.~~

### ~~2.11 — Energy Efficiency~~

~~It is the policy of the Metro Council to:~~

~~2.11.1 — Plan transportation systems that promote efficient use of energy.~~

### ~~2.12 — Regional Street Design~~

~~It is the policy of the Metro Council to:~~

## EXHIBIT G TO ORDINANCE NO. 10-1241A

~~2.12.1 Plan regional streets with a modal orientation that reflects the function and character of surrounding land uses, consistent with regional street design concepts.~~

### ~~2.13 Local Street Design~~

~~It is the policy of the Metro Council to:~~

~~2.13.1 Plan local street systems to complement planned land uses and to reduce dependence on major streets for local circulation, consistent with Section 6.4.5 in Chapter 6 of this plan.~~

### ~~2.14 Regional Motor Vehicle System~~

~~It is the policy of the Metro Council to:~~

~~2.14.1 Plan for a regional motor vehicle system of arterials and collectors that connect the central city, regional centers, industrial areas and intermodal facilities, and other regional destinations, and provide mobility within and through the region.~~

### ~~2.15 Regional Public Transportation System~~

~~It is the policy of the Metro Council to:~~

~~2.15.1 Plan for an appropriate level, quality and range of public transportation options to serve this region and support implementation of the 2040 Growth Concept.~~

### ~~2.16 Public Transportation Awareness and Education~~

~~It is the policy of the Metro Council to:~~

~~2.16.1 Expand the amount of information available about public transportation to allow more people to use the system.~~

### ~~2.17 Public Transportation Safety and Environmental Impacts~~

~~It is the policy of the Metro Council to:~~

~~2.17.1 Continue efforts to make public transportation an environmentally friendly and safe form of motorized transportation.~~

### ~~2.18 Regional Public Transportation Performance~~

~~It is the policy of the Metro Council to:~~

~~2.18.1 Plan for transit service that is fast, reliable and has competitive travel times compared to the automobile.~~



## EXHIBIT G TO ORDINANCE NO. 10-1241A

### ~~2.19 — Special Needs Public Transportation~~

~~It is the policy of the Metro Council to:~~

~~2.19.1 Provide an appropriate level, quality and range of public transportation options to serve the variety of special needs individuals in this region and support the implementation of the 2040 Growth Concept.~~

~~2.19.2 Provide a seamless and coordinated public transportation system for the special needs population.~~

~~2.19.3 Encourage the location of elderly and disabled facilities in areas with existing transportation services and pedestrian amenities.~~

### ~~2.20 — Regional Freight System~~

~~It is the policy of the Metro Council to:~~

~~2.20.1 Plan for efficient, cost-effective and safe movement of freight in and through the region.~~

### ~~2.21 — Regional Freight System Investments~~

~~It is the policy of the Metro Council to:~~

~~2.21.1 Protect and enhance public and private investments in the freight network.~~

### ~~2.22 — Regional Bicycle System Connectivity~~

~~It is the policy of the Metro Council to:~~

~~2.22.1 Plan for a continuous regional network of safe and convenient bikeways connected to other transportation modes and local bikeway systems, consistent with regional street design guidelines.~~

### ~~2.23 — Regional Bicycle System Mode Share and Accessibility~~

~~It is the policy of the Metro Council to:~~

~~2.23.1 Increase the bicycle mode share throughout the region and improve bicycle access to the region's public transportation system.~~

### ~~2.24 — Regional Pedestrian System~~

~~It is the policy of the Metro Council to:~~

~~2.24.1 Plan the pedestrian environment to be safe, direct, convenient, attractive and accessible for all users.~~

## EXHIBIT G TO ORDINANCE NO. 10-1241A

### ~~2.25 — Regional Pedestrian Mode Share~~

~~It is the policy of the Metro Council to:~~

- ~~2.25.1 Increase walking for short trips and improve pedestrian access to the region's public transportation system through pedestrian improvements and changes in land use patterns, designs and densities.~~

### ~~2.26 — Regional Pedestrian Access and Connectivity~~

~~It is the policy of the Metro Council to:~~

- ~~2.26.1 Plan for direct pedestrian access, appropriate to existing and planned land uses, street design classification and public transportation, as a part of all transportation projects.~~

### ~~2.27 — Transportation System Management~~

~~It is the policy of the Metro Council to:~~

- ~~2.27.1 Use transportation system management techniques to optimize performance of the region's transportation systems. Mobility will be emphasized on corridor segments between 2040 Growth Concept primary land use components. Access and livability will be emphasized within such designations. Selection of appropriate transportation system techniques will be according to the functional classification of corridor segments.~~

### ~~2.28 — Regional Transportation Demand Management~~

~~It is the policy of the Metro Council to:~~

- ~~2.28.1 Enhance mobility and support the use of alternative transportation modes by improving regional accessibility to public transportation, carpooling, telecommuting, bicycling and walking options.~~

### ~~2.29 — Regional Parking Management~~

~~It is the policy of the Metro Council to:~~

- ~~2.29.1 Manage and optimize the efficient use of public and commercial parking in the central city, regional centers, town centers, main streets and employment centers to support the 2040 Growth Concept and related RTP policies and objectives.~~

### ~~2.30 — Peak Period Pricing~~

~~It is the policy of the Metro Council to:~~

- ~~2.30.1 Manage and optimize the use of highways in the region to reduce congestion, improve mobility and maintain accessibility within limited financial resources.~~

## EXHIBIT G TO ORDINANCE NO. 10-1241A

### ~~2.31 — Transportation Funding~~

~~It is the policy of the Metro Council to:~~

~~2.31.1 Ensure that the allocation of fiscal resources is driven by both land use and transportation benefits.~~

### ~~2.32 — 2040 Growth Concept Implementation~~

~~It is the policy of the Metro Council to:~~

~~2.32.1 Implement a regional transportation system that supports the 2040 Growth Concept through the selection of complementary transportation projects and programs.~~

### ~~2.33 — Transportation System Maintenance and Preservation~~

~~It is the policy of the Metro Council to:~~

~~2.33.1 Emphasize the maintenance, preservation and effective use of transportation infrastructure in the selection of the RTP projects and programs.~~

### ~~2.34 — Transportation Safety~~

~~It is the policy of the Metro Council to:~~

~~2.34.1 Anticipate and address system deficiencies that threaten the safety of the traveling public in the implementation of the RTP.~~

### **Goal 1: Foster Vibrant Communities and Efficient Urban Form**

Land use and transportation decisions are linked to optimize public investments and support active transportation options and jobs, schools, shopping, services, recreational opportunities and housing proximity.

- **Objective 1.1 Compact Urban Form and Design** - Use transportation investments to reinforce growth in and multi-modal access to 2040 Target Areas and ensure that development in 2040 Target Areas is consistent with and supports the transportation investments.
- **Objective 1.2 Parking Management** – Minimize the amount and promote the efficient use of land dedicated to vehicle parking.
- **Objective 1.3 Affordable Housing** – Support the preservation and production of affordable housing in the region.

### **Goal 2: Sustain Economic Competitiveness and Prosperity**

Multi-modal transportation infrastructure and services support the region's well-being and a diverse, innovative, sustainable and growing regional and state economy.

- **Objective 2.1 Reliable and Efficient Travel and Market Area Access** - Provide for reliable and efficient multi-modal regional, interstate and intrastate travel and market area access through a seamless and well-connected system of throughways, arterial streets, freight services, transit services and bicycle and pedestrian facilities.

## EXHIBIT G TO ORDINANCE NO. 10-1241A

- **Objective 2.2 Regional Passenger Connectivity** – Ensure reliable and efficient connections between passenger intermodal facilities and destinations in and beyond the region to improve non-auto access to and from the region and promote the region’s function as a gateway for tourism.
- **Objective 2.3 Metropolitan Mobility** - Maintain sufficient total person-trip and freight capacity among the various modes operating in the Regional Mobility Corridors to allow reasonable and reliable travel times through those corridors.
- **Objective 2.4 Freight Reliability** –Maintain reasonable and reliable travel times and access through the region as well as between freight intermodal facilities and destinations within and beyond the region to promote the region’s function as a gateway for commerce.
- **Objective 2.5 – Job Retention and Creation** – Attract new businesses and family-wage jobs and retain those that are already located in the region.

### **Goal 3: Expand Transportation Choices**

Multi-modal transportation infrastructure and services provide all residents of the region with affordable and equitable options for accessing housing, jobs, services, shopping, educational, cultural and recreational opportunities, and facilitate competitive choices for goods movement for all businesses in the region.

- **Objective 3.1 Travel Choices** - Achieve modal targets for increased walking, bicycling, use of transit and shared ride and reduced reliance on the automobile and drive alone trips.
- **Objective 3.2 Vehicle Miles of Travel** - Reduce vehicle miles traveled per capita.
- **Objective 3.3 Equitable Access and Barrier Free Transportation** - Provide affordable and equitable access to travel choices and serve the needs of all people and businesses, including people with low income, children, elders and people with disabilities, to connect with jobs, education, services, recreation, social and cultural activities.
- **Objective 3.4 Shipping Choices** – Support multi-modal freight transportation system that includes air cargo, pipeline, trucking, rail, and marine services to facilitate competitive choices for goods movement for businesses in the region.

### **Goal 4: Emphasize Effective and Efficient Management of the Transportation System**

Existing and future multi-modal transportation infrastructure and services are well-managed to optimize capacity, improve travel conditions and address air quality goals.

- **Objective 4.1 Traffic Management** – Apply technology solutions to actively manage the transportation system.
- **Objective 4.2 Traveler Information** – Provide comprehensive real-time traveler information to people and businesses in the region.
- **Objective 4.3 Incident Management** – Improve traffic incident detection and clearance times on the region’s transit, arterial and throughways networks.
- **Objective 4.4 Demand Management** – Implement services, incentives and supportive infrastructure to increase telecommuting, walking, biking, taking transit, and carpooling, and shift travel to off-peak periods.
- **Objective 4.5 Value Pricing** – Consider a wide range of value pricing strategies and techniques as a management tool, including but not limited to parking management to encourage walking, biking and transit ridership and selectively promote short-term and long-term strategies as appropriate.

## EXHIBIT G TO ORDINANCE NO. 10-1241A

### **Goal 5: Enhance Safety and Security**

Multi-modal transportation infrastructure and services are safe and secure for the public and goods movement.

- **Objective 5.1 Operational and Public Safety** - Reduce fatalities, serious injuries and crashes per capita for all modes of travel.
- **Objective 5.2 Crime** - Reduce vulnerability of the public, goods movement and critical transportation infrastructure to crime.
- **Objective 5.3 Terrorism, Natural Disasters and Hazardous Material Incidents** - Reduce vulnerability of the public, goods movement and critical transportation infrastructure to acts of terrorism, natural disasters, hazardous material spills or other hazardous incidents.

### **Goal 6: Promote Environmental Stewardship**

Promote responsible stewardship of the region's natural, community, and cultural resources.

- **Objective 6.1 Natural Environment** – Avoid or minimize undesirable impacts on fish and wildlife habitat conservation areas, wildlife corridors, significant flora and open spaces.
- **Objective 6.2 Clean Air** – Reduce transportation-related vehicle emissions to improve air quality so that as growth occurs, the view of the Cascades and the Coast Range from within the region are maintained.
- **Objective 6.3 Water Quality and Quantity** – Protect the region's water quality and natural stream flows.
- **Objective 6.4 Energy and Land Consumption** - Reduce transportation-related energy and land consumption and the region's dependence on unstable energy sources.
- **Objective 6.5 Climate Change** – Reduce transportation-related greenhouse gas emissions.

### **Goal 7: Enhance Human Health**

Multi-modal transportation infrastructure and services provide safe, comfortable and convenient options that support active living and physical activity, and minimize transportation-related pollution that negatively impacts human health.

- **Objective 7.1 Active Living** – Provide safe, comfortable and convenient transportation options that support active living and physical activity to meet daily needs and access services.
- **Objective 7.2 Pollution Impacts** – Minimize noise, impervious surface and other transportation-related pollution impacts on residents in the region to reduce negative health effects.

### **Goal 8: Ensure Equity**

The benefits and adverse impacts of regional transportation planning, programs and investment decisions are equitably distributed among population demographics and geography, considering different parts of the region and census block groups with different incomes, races and ethnicities.

- **Objective 8.1 Environmental Justice** – Ensure benefits and impacts of investments are equitably distributed by population demographics and geography.

## EXHIBIT G TO ORDINANCE NO. 10-1241A

- **Objective 8.2 Coordinated Human Services Transportation Needs** - Ensure investments in the transportation system provide a full range of affordable options for people with low income, elders and people with disabilities consistent with the Tri-County Coordinated Human Services Transportation Plan (CHSTP).
- **Objective 8.3 Housing Diversity** - Use transportation investments to achieve greater diversity of housing opportunities by linking investments to measures taken by the local governments to increase housing diversity.
- **Objective 8.4 Transportation and Housing Costs**– Reduce the share of households in the region spending more than 50 percent of household income on housing and transportation combined.

### **Goal 9: Ensure Fiscal Stewardship**

Regional transportation planning and investment decisions ensure the best return on public investments in infrastructure and programs.

- **Objective 9.1 Asset Management**– Adequately repair and maintain transportation facilities and services to preserve their function, maintain their useful life and eliminate maintenance backlogs.
- **Objective 9.2 Maximize Return on Public Investment** - Make transportation investment decisions that use public resources effectively and efficiently, using performance-based planning.
- **Objective 9.3 Stable and Innovative Funding** – Stabilize existing transportation revenue while securing new and innovative long-term sources of funding adequate to build, operate and maintain the regional transportation system for all modes of travel at the federal, state, regional and local level.

### **Goal 10: Deliver Accountability**

The region’s government, business, institutional and community leaders work together in an open and transparent manner so the public has meaningful opportunities for input on transportation decisions and experiences an integrated, comprehensive system of transportation facilities and services that bridge governance, institutional and fiscal barriers.

- **Objective 10.1 Meaningful Input Opportunities** - Provide meaningful input opportunities for interested and affected stakeholders, including people who have traditionally been underrepresented, resource agencies, business, institutional and community stakeholders, and local, regional and state jurisdictions that own and operate the region’s transportation system in plan development and review.
- **Objective 10.2 Coordination and Cooperation** - Ensure representation in regional transportation decision-making is equitable from among all affected jurisdictions and stakeholders and improve coordination and cooperation among the public and private owners and operators of the region’s transportation system so the system can function in a coordinated manner and better provide for state and regional transportation needs.

**2035 Regional Transportation Plan (RTP)  
Summary of Comments Received and Recommended Actions**

(comments received March 22 through May 6, 2010)

The 2035 Regional Transportation Plan (RTP) Final Public Review Draft, Regional Transportation Functional Plan and regional plans for freight, transportation system management and operations and high capacity transit were released for final public review from March 22 through May 6, 2010. No comments were received on Exhibits B, C, D, F and G. TPAC and MTAC discussed and identified refinements to the public review draft regional transportation functional plan at their March and April meetings. In addition, members submitted additional comments subsequent to the advisory committee discussions. Public agencies, advocacy groups and members of the public submitted comments in writing, through Metro's website and in testimony provided at a public hearing held by the Metro Council on May 6, 2010. This document summarizes recommended changes to respond to all substantive comments received during the comment period. New wording is shown in **bold underline**; deleted words are *crossed out in italics*. Amendments to Exhibit E (Regional Transportation Functional Plan) are reflected in Exhibit E. Amendments to Exhibit A (2035 Regional Transportation Plan and Appendices) will be reflected in the final printed RTP document. This document does not recommend amendments to Exhibits B, C, D, F and G.

**ITEMS FOR CONSIDERATION**

#	Category	Comment	Source(s)	Date	Recommended Action
1	RTFP Title 1: Street System Design	Section 3.08.110: add a description of intent of this section.	TPAC	3/26/10	Amend as requested.
2	RTFP Title 1: Street System Design	Add the following language to Section 3.08.110, "To improve the walking environment along the region's arterial system, each city and county shall incorporate into its TSP a sidewalk network that includes a minimum 5ft sidewalk with a minimum 3ft planted buffer or furnishings zone between the sidewalk and the curb."	TriMet	4/9/10	See comment #118 and amend to add a new section to 3.08.110A to direct local codes to allow for implementation of the regional street design guidelines for all streets (e.g., local, collector, arterial) as follows, " <b><u>To ensure that new street construction and re-construction projects are designed to improve safety, support adjacent land use and balance the needs of all users, including bicyclists, transit vehicles, motorists, freight delivery vehicles and pedestrians of all ages and abilities, city and county street design regulations shall allow implementation of:</u></b>  <b><u>1. Complete street designs as set forth in Creating Livable Streets: Street Design Guidelines for 2040 (2nd Edition, 2002), or similar resources consistent with regional street design policies;</u></b>  <b><u>2. Green street designs such as bio-swales, street trees, and other techniques to manage stormwater within the public right-of-way as set forth in Green Streets: Innovative Solutions for Stormwater and Street Crossings (2002) and Trees for Green Streets: An Illustrated Guide (2002) or similar resources consistent with federal regulations for stream protection; and</u></b>  <b><u>3. Transit-supportive street designs that facilitate existing and planned transit service pursuant subsection 3.08.120B."</u></b>
3	RTFP Title 1: Street System Design	Section 3.08.110 - the arterial and collector spacing provisions are too rigid; many areas of the region will not be able to meet them due to the constraints listed in this section.	City of Tigard, City of Portland, Washington County	4/11/2010, 5/6/10, 5/6/10	Amend as follows, "each city and county shall incorporate into its TSP, <b><u>to the extent practicable</u></b> , a network of <i>four-lane</i> major arterial street..." The intent of this provision is to have local governments attempt to meet the spacing, recognizing it will not be possible in many areas. See comments # 54 and #116.

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
4	RTFP Title 1: Street System Design	Section 3.08.110D(3) - Provide an additional exception from the road spacing standards for streams that support species listed in the Endangered Species Act (ESA).	City of West Linn	4/9/10	Amend 3.08110D as follows, " <b><u>7. Best practices and designs as set forth in Green Streets: Innovative Solutions for Stormwater, Street Crossings (2002) and Trees for Green Streets: An Illustrated Guide (2002), Creating Livable Streets: Street Design Guidelines for 2040 (2nd Edition, 2002), and state or locally-adopted plans and best practices for protecting natural resources and natural areas.</u></b> " The functional plan requires locals to complete a street connectivity plan in their TSPs that implements street connections across stream corridors at 800 to 1,200 foot spacing unless habitat quality or the length of the crossing width prevents a connection. Title 3 of the Urban Growth Management Functional Plan maps high quality habitat areas and regulations, and includes ESA listed stream corridors. No other changes are recommended at this time pending completion of the following efforts: (1) development of a wildlife corridors map for the region; (2) development of a Regional Conservation Framework for biodiversity; (3) completion of updates to the Livable Streets and Green Streets Best Practices in Transportation Design handbooks and (4) completion of the Lower Columbia River Salmon and Steelhead Conservation and Recovery Plan. The current language provides flexibility for local governments to assess the appropriateness of increasing connectivity on a site-by-site and project-by-project basis, pending completion of a number of efforts that are underway in this region.
5	RTFP Title 1: Street System Design	3.08.110 D.5 and 6- define what is meant by "pursuant to Title 3 of the UGMFP." Water way crossings every 530 feet seems like a lot, but the caveat for when "the length of the crossing prevents a connection" is also vague.	City of Tigard	4/11/10	Amend as follows, "3. If streets must cross water features <b><u>identified-protected</u></b> pursuant to Title 3 UGMFP, provides a crossing every 800 to 1,200 feet unless habitat quality or the length of the crossing prevents a full street connection;" No other changes are recommended at this time pending completion of the following efforts: (1) development of a wildlife corridors map for the region; (2) development of a Regional Conservation Framework for biodiversity; (3) completion of updates to the Livable Streets and Green Streets Best Practices in Transportation Design handbooks and (4) completion of the Lower Columbia River Salmon and Steelhead Conservation and Recovery Plan. The current language provides flexibility for local governments to assess the appropriateness of increasing connectivity on a site-by-site and project-by-project basis, pending completion of a number of efforts that are underway in this region.



## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
6	RTFP Title 1: Street System Design	Section 3.08.110E - This section discusses "redevelopment of existing land uses" where locals are to "encourage" adequate connectivity. But in C above, it requires conceptual street maps (which implies a connectivity requirement) for all redevelopable parcels over five acres. Clarify whether this provision applies to parcels under five acres.	ODOT, City of Tigard	4/9/2010, 4/11/10	Amend as requested. This provision is intended to apply to parcels less than five acres in size.
7	RTFP Title 1: Street System Design	Section 3.08.110F: Add language to clarify the following: (1) the intent of this provision is for local codes to allow for narrow street designs as described in 1-10, and (2) greater total right-of-way dimensions should be allowed for green street designs.	TPAC, Washington County, City of Sherwood	3/26/10, 4/9/2010 and 4/9/10	Amend as requested, deleting the provision " <del>1. Local streets of no more than 50 feet of total right-of-way, including.</del> " because the individual design elements are addressed through subsequent provisions. The intent of this section was to require local codes to allow for implementation of narrower street designs, not to limit the maximum width of street designs and elements.
8	RTFP Title 1: Street System Design	3.08.110F(2) The maximum 28' curb to curb width is too restricting. For example, if a local street is a bike boulevard with on-street parking. 6' parking (two-sided) plus two 10' travel lanes should be allowable, at least (32').	City of Milwaukie	4/9/10	No change recommended. The intent of this section was to require local codes to allow for implementation of narrower street designs, not to limit the maximum width of street designs and elements.
9	RTFP Title 1: Transit Design	3.08.120A - Change references to passenger "environment," bicycle "environment" and waiting "environments" to "facilities" to be more specific about what the provisions apply to.	TPAC	3/26/10	Amend to simplify this section to read as follows, "City and county TSPs <del>and</del> <u>or</u> other land use appropriate regulations shall include <del>projects investments</del> , policies, <u>standards</u> and <del>strategies regulations</del> <u>criteria to improve provide</u> pedestrian and bicycle connections to all transit stops <u>where regional transit service exists at the time of TSP development or update and</u> <del>, passenger environments within one-half mile of all transit stops, bicycle environments within three miles of all transit stops, waiting environments at all transit stops and transit service speed and reliability for all existing or planned Station Communities. high capacity transit station areas, on-street bus rapid transit and frequent service bus corridors, and regional bus corridors where service exists at the time of TSP development or updates.</del> The use of the term "environment" and specific distances unnecessarily narrowed the focus of where these kinds of investments and regulations should apply.
10	RTFP Title 1: Transit Design	3.08.120 A - clarify sentence to better describe intent, including improve the "speed and reliability" of station areas	City of Milwaukie	4/9/10	Amend to remove references to improving the speed and reliability of station areas. This is already addressed through transportation system management and operations strategies in Title 1.
11	RTFP Title 1: Transit Design	3.08.120 B1e - Revise to read as follows "crossing at <u>OR</u> <u>NEAR</u> all transit stops..." It is not feasible to ensure crossings at all transit stops.	City of Milwaukie	4/9/10	No change recommended. "At" as defined in the Transportation Planning Rule and Title 7 of the RTFP as being within 200 feet. If it is not feasible to provide a crossing within that spacing, it may not be appropriate to have a transit stop in that particular location.
12	RTFP Title 1: Transit Design	3.08.120 B(1)a - Expanding this requirement from only Major Transit Stops to include "or on transit routes designated in the RTP" could be subject to challenges.	Washington County, City of Sherwood	4/9/10	Amend to remove reference to "along transit routes" to be consistent with the Transportation Planning Rule provision.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
13	RTFP Title 1: Transit Design	3.08.120B(1)b - In some cases (i.e. MAX stops along freeways) it is not appropriate to locate buildings within 20 feet of transit stops or provide a pedestrian plaza at transit stops.	ODOT	4/9/10	Amend section to clarify this provision applies to major transit stops, which by definition (in the Title 7 and the Transportation Planning Rule) could be located within 200 feet.
14	RTFP Title 1: Transit Design	For providing lighting at transit stops, consider additional/ more stringent standards for HCT stations versus bus stops. Look at the draft HCT SEP Guidance, specifically the "urban form measures" which includes building orientation, building frontage, average block size, sidewalk coverage, and bicycle facility coverage. Earlier versions also included measures for pedestrian network connectivity (intersection density, safe access to stations, mitigation of topographic challenges and physical barriers) and bicycle network connectivity (miles of bike facilities within 2 miles of station areas) .	ODOT	4/9/10	No change recommended. This language is consistent with the Transportation Planning Rule. TriMet can provide additional guidance to local governments on this issue.
15	RTFP Title 1: Pedestrian System Design	3.08.130B 4 - Parking Management does not belong in this section. Parking does impact pedestrian conditions. Parking management should be covered well enough in Title 6.	City of Tigard	4/11/10	Amend introduction to clarify these actions and strategies are intended to support transit within designated pedestrian districts. Parking management is an important strategy to accomplish this.
16	RTFP Title 1: Pedestrian System Design	What is "interconnection" and how does one provide it?	ODOT	4/9/10	No change recommended. As defined by Webster's dictionary, this term means "to connect with one another," and is intended to mean providing sidewalks and bike facility connections to transit stops or stations.
17	RTFP Title 1: Bicycle Design	3.08.140 A(4) - Revise to read, "...along arterials and major collectors <u>and/or along nearby parallel routes.</u> "	City of Milwaukie	4/9/10	Amend as follows, "...along arterials and major collectors <b>and nearby parallel routes.</b> "
18	RTFP Title 2: Transportation Needs	3.08.210 A - This suggests that local governments need to reconfirm state and regional needs are adequately supported and to take remedial action if they are not.	TPAC, Washington County	4/9/10	Amend to clarify that local TSPs should incorporate regional needs as identified in the RTP, as follows, " Each city and county <b>shall update its TSP to incorporate regional and state transportation needs identified in the 2035 RTP, and determine its own transportation needs</b> <del>for consistency with and support of regional and state transportation needs in the 2035 RTP and to complete the transportation system plans developed under Title 1.</del> The determination of <b>local transportation</b> needs shall be based upon..." Local TSPs are not required to reassess regional needs, but may identify unaddressed regional needs in the more detailed analysis of the local system. If that occurs, this provision provides a process for forwarding the regional need to Metro for amendment into the RTP, reflecting the iterative nature of the regional and local TSP process.
19	RTFP Title 2: Transportation Needs	3.08.210C - Currently, state rules that require us to take an exception for most improvements outside the UGB. The state is in a rulemaking process to address how to providing services in urban reserves. Allow the state process continue with the understanding that counties, which work directly with state rules now, will adjust to modifications that may come out.	Washington County	4/9/10	Amend section to delete this provision. Existing state law already directs that local governments must request an exception for transportation facilities located outside of the urban growth boundary. OAR 660-012-0070 provides criteria and standards for requesting an exception. In addition, Title 11 of the Urban Growth Management Functional Plan (see Section 3.07.1110) directs concept planning in urban reserve areas.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
20	RTFP Title 2: Transportation Solutions	3.08.220A - Specify what it means for a city or county "to consider" the strategies listed.	TPAC	3/26/10	No change is recommended The intent is for the city or county to document this provision in writing in the TSP document and in their "findings of fact" adopted as part of the TSP ordinance.
21	RTFP Title 2: Transportation Solutions	3.08.220 - This specifies that the City shall consider specific strategies in priority order to meet the transportation needs. It is still unclear as to why the strategies must be evaluated in this particular priority order. Hypothetically, it may be that strategy 2 and 5 work well together but 3 does little or is impractical. Rather, strategies 1-5 in combination should be considered fully, with discussion on why certain strategies were not deemed the most appropriate.	MTAC, City of Sherwood	4/5/10, 4/9/2010	Amend to better describe the intent of this section, "Each city and county shall <del>consideration</del> of the following strategies, <del>listed in the</del> order listed of priority, to meet the transportation needs determined pursuant to section 3.08.210 <b>and performance targets and standards pursuant to section 3.08.230.</b> The city or county shall explain its choice <del>of a lower priority strategy over a higher priority strategy</del> of one or more of the following strategies <b>and why other strategies were not chosen</b> ..." A city or county may consider combinations of the strategies listed as part of this analysis. This approach is consistent with the federally-required Congestion Management Process (CMP) steps and the Oregon Highway Plan Major Improvement Policy 1G which requires actions to maintain performance and improve safety through system efficiency and management before adding capacity.
22	RTFP Title 2: Transportation Solutions	Revise 3.08.220A to add a reference to the targets and standards in Table 3.08-1 and Table 3.08-2 in the first sentence; the strategies also serve as a basis for achieving the performance targets and standards in these tables.	TPAC	3/26/10	Amend as requested.
23	RTFP Title 2: Transportation Solutions	Revise 3.08.220A(6) as follows, "Motor vehicle capacity improvements...only upon a demonstration that other strategies in this subsection are not appropriate or cannot adequately address identified transportation needs."	TPAC	3/26/10	Amend as requested.
24	RTFP Title 2: Transportation Solutions	3.08.220B - Add the following language, " <u>Facility design is subject to the approval of the facility owner.</u> "	ODOT	4/9/10	Amend as requested.
25	RTFP Title 2: Performance Targets and Standards	3.08.220D - Corridor refinement plans or local TSPs may result in alternative mobility standards for entire corridors or segments. The Areas of Special Concern designation is no longer needed and can be managed either under the "no further degradation" standard or through an alternative mobility standard.	ODOT	4/9/10	Amend as requested to eliminate the areas of special concern designation. In addition, convert the mobility standard letter grades to volume/capacity ratios that match the Oregon Highway Plan Table 7 ratios to more clearly define the standard.
26	RTFP Title 2: Performance Targets and Standards	3.08.230A - This section suggests the only purpose of the performance targets and standards is to improve performance of state highways as much as feasible. This is one desired outcome. In addition, Locals should not need to make findings of meeting state system performance standards separately as suggested by this provision. The RTP findings need to make this demonstration. Revise this subsection to include state highway performance in Subsection F to link to other performance targets and desired outcomes.	TPAC, Washington County	3/26/10	Amend to move the highway performance provision to subsection E as follows, "To demonstrate progress toward achievement of performance targets in Tables 3.08-1 and 3.08-2 <b>and to improve performance of state highways within its jurisdiction as much as feasible and avoid their further degradation</b> , the city or county shall <b>adopt</b> the following actions..." By adopting the actions, a local government can demonstrate through findings they are making progress toward the targets and improving state highway performance as much as feasible.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
27	RTFP Title 2: Performance Targets and Standards	3.08.230C(1) - Add reference to Table 3.08-2 (Motor vehicle performance standard).	TPAC	3/26/10	Amend as requested.
28	RTFP Title 2: Performance Targets and Standards	3.08.230 - It is unclear how a local government can assess whether a capacity improvement would shift unacceptable levels of congestion into neighboring jurisdictions along shared regional facilities.	ODOT	4/7/10	Amend to delete the following provision, " <del>Will not result in motor vehicle capacity improvements that shift unacceptable levels of congestion into neighboring jurisdictions along shared regional facilities;...</del> " The regional mobility corridor strategies in Chapter 4 of the RTP provide a framework for making this determination through amendments and updates to the RTP.
29	RTFP Title 2: Performance Targets and Standards	3.08.230D - This reads as though local governments need to pre-authorize alternative mobility standards with the Oregon Transportation Commission.	TPAC, Washington County	3/26/10 4/9/2010	Amend as follows, "If the city or county adopts mobility standards <b>for state highways</b> different from those in Table 3.08-2..." to clarify that this provision only applies to state-owned facilities.
30	RTFP Title 2: Performance Targets and Standards	3.08.230E - Concern with having to evaluate accessibility and safety at the TSP level; these are more appropriate for regional level analysis like Metro conducts for air quality and greenhouse gas emissions.	TPAC, City of Tigard	3/26/2010, 4/11/10	Amend to direct TSPs to include a broader set of performance measures for evaluating and monitoring TSP performance, and to eliminate the accessibility measure.
31	RTFP Title 2: Performance Targets and Standards	3.08.230E - Clarify what this is intended to say" that reduce parking ratios <u>as</u> required by 3.08.410" or below what is required.	ODOT	4/9/10	Amend as follows, " <del>Parking development and management plans that reduce the</del> parking minimum and maximum ratios <b>in Centers and Station Communities</b> <del>as required by</del> consistent with subsection 3.08.410A;" See comments #36 and #156.
32	RTFP Title 2: Performance Targets and Standards	3.08.230F - It is important to have parking development and management plans and street design standards, but not necessarily as part of a TSP. This language suggests they must be included in the TSP.	City of Tigard	4/11/10	Amend to allow parking management plans to be adopted as a separate policy document and not necessarily as part of the TSP.
33	RTFP Title 2: Performance Targets and Standards	3.08.230F(2) - Revise to include reference to all of the Transportation System Design provisions in Title 1, Section 3.08-110 to Section 3.08.160.	TPAC	3/26/10	Amend as follows, " <b>Designs for street, transit, bicycle, freight and pedestrian systems consistent with Title 1, Street design standards in section 3.08.110'</b> "
34	RTFP Title 4: Parking Management	3.08.410H – this seems overly prescriptive and does not respect that one size does not fit all. Bicycle parking demand in a center with close proximity to transit and higher density is going to be vastly different than areas further out and will also vary by use. Suggestions for making this more applicable region-wide would be to apply the 5% bicycle parking minimum to commercial zones or uses only, with specific allowances that if the use does not cater to the public or is typically a car oriented use (drive-through restaurant or auto repair for example) the bicycle parking minimum could be reduced further. Alternatively, consider adding something similar to 3.08.410.B for this section.	City of Sherwood	4/9/10	Amend as follows to provide more flexibility for different land use types, " <b>To encourage the use of bicycles and ensure adequate bicycle parking for different land uses</b> , cities and counties shall establish <u>short-term and long-term</u> bicycle parking minimums <del>at, or above five percent of off-street motor vehicle parking provided, for:...</del> " and to add OAR 660-012-0045(3)(a) provisions.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
35	RTFP Title 4: Parking Management	3.08.410I - Parking Overall - Allow a broader array of potential solutions so a jurisdiction can decide which areas warrant the more detailed study as follows, " <u>Cities and counties shall adopt parking policies, plans, or regulations for Centers and existing HCT corridors. Such actions shall be designed to constrain surface off-street auto parking supply, and manage use of this limited supply to support active places. Parking management plans may focus on sub-areas of Centers, and shall include an inventory of parking supply and usage, a range of strategies for managing supply and demand, and an evaluation of bicycle parking needs. Policies and regulations should include by-right exemptions from minimum parking requirements, or policies to encourage shared and structured parking.</u> "	City of Milwaukie	4/9/10	Amend as follows, " Cities and counties shall adopt parking <b>policies</b> , management plans <b>and regulations</b> for Centers and Station Communities <i>as defined in Title 6 of the UGMFP and high-capacity transit corridors, and designated in the RTP. The policies, plans and regulations shall be</i> consistent with subsection A through H. <b>Plans may be adopted in TSPs or other adopted policy documents and may focus on sub-areas of Centers.</b> Plans shall include an inventory of parking <b>supply</b> and usage, <i>a range of strategies for managing parking supply and demand</i> and an evaluation of bicycle parking needs with consideration of TriMet Bicycle Parking Guidelines. <b>Policies shall be adopted in the TSP. Policies, plans and regulations</b> must consider and may include the following range of strategies:.." This change directs TSPs to include a range of parking policies to manage parking demand and supply, and allows parking management plans to be adopted as a separate policy document and for subareas of centers.
36	RTFP Title 4: Parking Management	3.08.410A, Revise to read, "Cities and county parking regulations shall <del>meet or set lower</del> minimums and maximums as per the following:"	City of Milwaukie	4/9/10	Amend as requested. See also comment #31 and #207, which further refine this recommendation.
37	RTFP Title 4: Parking Management	3.08.410B - Revise to state local governments "should" establish a process for various and clarify to whom parking variances should be reported. The reporting requirement seems overly burdensome.	City of Milwaukie, City of Tigard	4/9/2010, 4/11/10	Amend as follows to remove the reporting requirement, " Cities and counties may establish a process <i>to consider for</i> variances from minimum and maximum parking ratios <b>that includes criteria for a variance.</b> "
38	RTFP Title 4: Parking Management	3.08.410C - Revise last sentence to use the word "may" instead of "should" to allow for consideration of a broader set of parking practices.	City of Milwaukie, City of Tigard	4/9/10, 4/11/10	Amend as requested.

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
39	RTFP Title 5: Amendment of Comprehensive Plans	3.08.510C - The TPR -0060(8) considers the 2040 Central City, Regional Centers, Town Centers and Main Streets as "mixed use, pedestrian –friendly centers or neighborhoods" that may take a 10% trip reduction – not corridors. The Title 6 UGMFP discussion is still ongoing, but should determine which design concept areas may qualify for a 30% trip reduction credit. The draft UGMFP Title 6 does not so far include specific standards for levels of densities and intensities appropriate to support HCT and other levels of transit. ODOT supports the incentive versus regulation approach, but not with offering the 30% trip reduction and the lower mobility standards incentives for Station Communities without higher density targets for these areas. ODOT supports transit-supportive mixed use and higher densities in Corridors, but justification for a 30% reduction in vehicle trips is just not there because of the significantly lower density, mix and design expectations and the lack of parking management requirements in 2040 Corridors. ODOT supports jurisdictions taking a 30% vehicular trip reduction credit if they have met all of the system design and TSMO requirements of Title 1 of the RTFP, plus the parking management plans of section 3.08.410.I, plus the land use requirements of Title 6 of the UGMFP (provided Title 6 itself is acceptable, which must include language prohibiting new auto-dependent uses and setting adequate density targets).Section 3.08.510.B: the reference to section 3.08.230.E should be added back in, as well as the requirement to do a parking management plan per section 3.08.410.I (not just the parking ratios per section 3.08.410A). In other words: to get the 30% trip reduction "credit" jurisdictions have to meet specific RTFP as well as UGMFP requirements. In the RTFP, Cities and Counties are required to adopt Parking Management Plans for Centers and Station Communities but not for Corridors. In the current UGMFP Title 1, the "prescribed" density in Corridors is only 25 persons per acre (compared to 45 ppa in Station Communities, 40 in Town Centers, and 39 in Main Streets).	ODOT	4/9/2010, 4/22/10	No change recommended. The 2040 Corridors and Station Communities are defined as mixed-use areas in the 2040 Growth Concept. In most cases they are currently served by regional transit service, and the 2040 Growth Concept calls for all corridors to have high quality transit service to support mixed-use growth. In addition, the RTP analysis for these areas assumes a mix of housing and jobs consistent with local comprehensive plan designations. The analysis is based on a level of mixed-use that is consistent with the Transportation Planning Rule (TPR). OAR 660-012-0060(8)(b) does not distinguish between different kinds of mixed-use areas, but does provide a list of characteristics that could be present in a station community or along a 2040 corridor. If these characteristics exist, the area should be considered mixed-use, and should be eligible for the trip reduction credit if the actions identified in 3.08.230E and in Title 6 of the UGMFP are adopted, and the area meets the other mixed-use characteristics identified in the TPR. Title 6 of the UGMFP references back to the provisions with the RTFP that must be adopted for local governments to be eligible for the lower mobility standards and 30 percent trip reduction credit to ensure consistency between the UGMFP and RTFP.
40	RTFP Title 5: Amendment of Comprehensive Plans	3.08.510C - Why does the 30% apply only in centers? If these practices/actions are effective for reducing vehicle trip generation, then the credit should apply to areas that have implemented them. I'm thinking the Tigard Triangle, but there could be many examples.	City of Tigard	4/11/10	No change recommended. This provision provides a "safe harbor" for Centers, Corridors and Station Communities if the actions identified in Title 6 of the UGMFP are adopted. OAR 660-012-0060 allows for a local government to make a case for a trip reduction credit in other mixed-use areas.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
41	RTFP Title 5: Amendment of Comprehensive Plans	Section 3.08.510C - Revise as follows, "If a city or county adopts the actions set forth in subsection E 3.08-230E and the land use actions..."	ODOT, TPAC	3/26/2010, 4/30/10	Amend as follows, "If a city or county adopts the actions set forth in <b>3.08.230E and subsection E and the land use actions set forth in</b> section ____ of Title 6 of the UGMFP, it shall be eligible for an automatic reduction of 30 percent below the vehicular trip generation rates..." This amendment links back to the land use actions proposed in Title 6 to the Urban Growth Management Functional Plan. The Title 6 section reference will be added upon adoption of Title 6 in December 2010.
42	RTFP Title 6: Compliance procedures	An amendment to a TSP is not the same as an Update. An amendment does not change the forecast year for the plan. It would be good to clarify.	City of Tigard	4/11/10	No change recommended. An update is an amendment of a TSP. However, a definition of "update" has been added to Title 7 (Definitions) to better define an "update" amendment. Most TSPs in the region will need to be "updated" to a 2035 planning horizon.
43	RTFP Title 6: Compliance procedures	Section 3.08.610F - Revise to require a city or county to submit an analysis of compliance of the amendment with the RTFP.	ODOT	4/9/10	No change recommended. This provision applies to notification of the first hearing on a proposed amendment. The staff report provided by local governments oftentimes includes documentation of how the proposed amendment is consistent with the RTFP. If insufficient information is provided to assist Metro staff review, the COO will request additional information. The compliance of the amendment will be documented in the Findings of Fact that will be adopted as part of the local TSP ordinance. Local governments are required to submit the adopted ordinance to Metro within 14 days of final adoption per 3.08.610J.
44	RTFP Title 6: Compliance procedures	Section 3.08.610H - It does not seem appropriate for local governments to appeal to JPACT as part of the enforcement for local compliance with the RTP.	ODOT, TPAC	4/9/2010, 4/30/10	Amend as requested.
45	RTFP Title 6: Compliance procedures	3.08.610A - Two years seems unrealistic for completing TSP update. It could easily take 2 years to get funding if it's through TGM. TGM may not have enough funding for needed updates along with corridor refinement planning work that has been defined in the RTP.	City of Tigard	4/11/10	Amend RTFP to include Table 3.08-4, which is a work plan for TSP updates. Metro staff worked with local governments to develop the work plan for TSP updates, taking into account local aspirations for completing TSP updates. Section 3.08.620 also provides a process for requesting an extension to the compliance deadline.
46	RTFP Title 7 Definitions	Add the following definitions - "Major transit stop," "Major driveway," "At" a major transit stop, and "near" a major transit stop	City of Sherwood	4/9/10	Amend as requested.
47	RTFP Title 7 Definitions	Definition of Significant increase in Single Occupancy Vehicle (SOV) capacity for multi-modal arterials - This defines general purpose lanes as through travel lanes or multiple turn lanes. Generally turn lanes are not considered general purpose lanes. They may have the side effect of adding capacity, but they have important safety benefits.	ODOT	4/9/10	This comment is under consideration, pending further direction from Federal Highway staff. See also comment #77.
48	RTFP Table 3.08-1	Table 3.08 - 1 Clarify whether the Regional Non-SOV modal targets apply to peak hour or 24-hour period	ODOT, City of Tigard, City of Portland	4/9/2010, 4/11/10, 5/4/10	Amend as requested to clarify the targets are for the average <b>daily</b> weekday trips( 24-hour period) for the year 2035. Also amend Table 2.6 in Chapter 2 of the RTP to reflect this clarification.
49	RTFP	Clarify what provisions apply to TSP and/or land use regulations.	TPAC	3/26/10	Amend as requested. Language has been added throughout the functional plan as appropriate.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
50	RTP Bicycle & Pedestrian System Maps	Show proposed regional trail along Sunrise Highway corridor (I-205 to Rock Creek Junction); this is a proposed project in the RTP.	Clackamas County	4/10/10	Amend as requested.
51	RTP Project List Map	Based on the draft TSP work for the City of Damascus, the alignment and modeling assumptions for RTP Project #10076 SE Sunnyside Rd. Extension have changed. Please update the project list map to reflect the changes based on the TSP work.	City of Damascus	4/22/10	Amend as requested.
52	RTP Chapter 2: System Maps	Amend the Regional Bike and Regional Pedestrian Network maps to show the Morrison bridge bike/ped path as solid instead of dashed on the bike/ped system maps. This project was recently completed.	Metro staff	4/28/10	Amend as requested.
53	RTP Chapter 2: System Maps	There is a discrepancy between the vehicular functional classification and the street design classification that we have on Tualatin Valley Highway and OR 212 - Principal Arterial is not supposed to go with Regional Street (plus, the street design classification just ends in the middle of Damascus...). Either revise the designations to be Principal Arterial and Highway in the RTP, based on the OHP Statewide/NHS designation, or let the Tualatin Valley Highway TGM study and the OR 212 Corridor Plan/Damascus TSP make recommendations for changing the designations.	ODOT	4/28/10	No change recommended. The Tualatin Valley Highway TGM study and the OR 212 Corridor Plan/Damascus TSP will make recommendations for changing the designations based on the analysis conducted through those efforts.
54	RTP Chapter 2	Amend Table 2.6 of the RTP to title the last column "number of <u>typical</u> planned travel lanes."	ODOT	4/26/10	Amend as follows, " <u>Typical</u> number of planned travel lanes." See comment #3 and #116.
55	RTP Chapter 4 - Mobility Corridor Strategies	The name of this mobility corridor is Tigard to Sherwood & Sherwood to Newburg, but the corridor analysis falls drastically short of providing any analysis of Highway 99W through Sherwood, and ignores completely the section between Sherwood and Newburg.	City of Sherwood	4/26/10	No change recommended. The 2035 RTP does not conduct an intersection level of analysis. The corridor analysis area for Mobility Corridor #20 as shown on page 4-145 of the 2035 RTP includes OR 99W through Sherwood to the Newburg city limits. Intersection level analysis through the City of Sherwood could be examined as part of the City's TSP update, if desired by the City.
56	RTP Chapter 4 - Mobility Corridor Strategies	Sherwood has four major roadways which intersect with Highway 99W: Roy Rogers Road/Tualatin-Sherwood Road, Edy Road, Meinecke Road, and Kruger-Elwert/Sunset Road. Of these intersections only Roy Rogers/Tualatin-Sherwood Road was provided a basic analysis. The other roads mentioned act as by-pass routes for traffic trying to avoid travelling along Highway 99W. These intersections should also be included in the corridor analysis as they are directly impacted by Highway 99W traffic flows.	City of Sherwood	4/26/10	No change recommended. The needs assessment conducted for each mobility corridor strategy focused on facilities identified on the regional system maps included in Chapter 2 of the RTP. Roy Rogers Road and Tualatin-Sherwood Road are on the regional roadway system map. The roads mentioned are not on the regional roadway system map; analysis of those facilities should be examined as part of the City's TSP update.



## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
57	RTP Chapter 4 - Mobility Corridor Strategies	Under the Safety Deficiencies (page 4-149), Highway 99W is rated as Category 4 and 5 based on the ODOT SPIS listing. Does this rating stop before Sherwood or does it continue on through Sherwood to Newburg? This analysis does not specify the limits where the rating of 4 and 5 occur. A discussion of the limits of the SPIS listing needs to be provided for the extent of Corridor #20 through to Newburg.	City of Sherwood	4/26/10	Amend as requested to clarify the extent of the SPIS information for OR 99W from Tigard through Sherwood to Newburg.
58	RTP Chapter 4 - Mobility Corridor Strategies	The emphasis of HCT for the near term solution to the traffic problems along Highway 99W through Sherwood, and from Sherwood to Newburg does not provide an adequate solution of the issues surrounding the intersections listed above. The HCT goal should be placed secondary to correcting the more immediate needs, issues and problems faced by traffic along Highway 99W at the intersections listed above.	City of Sherwood	4/26/10	No change recommended. Appropriateness of HCT will be examined through the Southwest Corridor Refinement Plan. Other traffic issues identified in the comment should be examined as part of the City's TSP update. This will also allow for development of solutions to address more immediate needs.
59	RTP Chapter 4 - Mobility Corridor Strategies	Based on review of the mobility corridor strategies for corridors, #19, #21, and #22, we have provided comments and recommended information for strategies to address needs.	City of Beaverton	3/29/10	Amend as requested.
60	RTFP Title 2: Transportation Needs	Add back in the following provision 3.08.210C - A. If a city or county identifies transportation needs in an urban reserve, it shall ensure planned improvements in the reserve are contingent upon addition of the reserve to the UGB and link to transportation facilities within the UGB.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 5/4/10	No change recommended. This is adequately addressed in Title 11 of the Urban Growth Management Functional Plan (see Section 3.07.1110), which directs concept planning in urban reserve areas. In addition, existing state law already directs local governments to request an exception for certain types of transportation facilities if they are located outside of the urban growth boundary. OAR 660-012-0070 provides criteria and standards for requesting the exception.
61	RTFP Purpose: 3.08.010	The objectives of the RTP listed in this section do not match the vision for the RTP, or the RTP goals or objectives, listed in Chapter 2. The objectives listed also do not mention addressing the transportation needs of underserved communities. <u>Recommendation:</u> Change outcomes to reflect the approved RTP goals and objectives	Coalition for a Livable Future	4/27/10	Amend as requested to reference the full set of goals included in the RTP.
62	RTFP Title 2: Transportation Needs	Timeframe for TSPs and modal plans per Title 1 is not spelled out. Statute may require that TSPs encompass the same time horizon as the RTP, but it would be clearer if it were spelled out in the RTFP.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 5/4/10	Amend Title 2, 3.08.210B(1) as follows, "The population and employment forecast <b>and planning period</b> ..." to clarify the TSP must be consistent with the RTP planning horizon.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
63	RTFP Title 1: Transportation System Design	Revise 3.08.110D to include additional language needed to inform the local agency of the unique opportunities or considerations to protect or enhance a particular site or resource. Green streets and other guides are referenced in 3.08.110A, but the language does not clearly make them part of the consideration when deciding the appropriateness of a road network. Further, current language does not consider best practices for protecting natural resources and natural areas. <u>Recommendation:</u> Add conformity with the guides listed in 3.08.110A; add conformity with locally adopted watershed plans; add "best practices for protecting natural resources and natural areas, which would include consultation with surface water management agencies and local watershed councils" as additional considerations for creation of a network of streets.	Coalition for a Livable Future	4/27/10	Amend 3.08.110D as follows, " <b><u>Best practices and designs as set forth in Green Streets: Innovative Solutions for Stormwater, Street Crossings (2002) and Trees for Green Streets: An Illustrated Guide (2002), Creating Livable Streets: Street Design Guidelines for 2040 (2nd Edition, 2002), and state or locally-adopted plans and best practices for protecting natural resources and natural areas.</u></b> " The functional plan requires locals to complete a street connectivity plan in their TSPs that implements street connections across stream corridors at 800 to 1,200 foot spacing unless habitat quality or the length of the crossing width prevents a connection. Title 3 of the Urban Growth Management Functional Plan maps high quality habitat areas and regulations, and includes ESA listed stream corridors. No other changes are recommended at this time pending completion of the following efforts: (1) development of a wildlife corridors map for the region; (2) development of a Regional Conservation Framework for biodiversity; (3) completion of updates to the Livable Streets and Green Streets Best Practices in Transportation Design handbooks and (4) completion of the Lower Columbia River Salmon and Steelhead Conservation and Recovery Plan. The current language provides flexibility for local governments to assess the appropriateness of increasing connectivity on a site-by-site and project-by-project basis, pending completion of a number of efforts that are underway in this region.
64	RTFP Title 1: Transit System Design	Revise 3.08.120C to require jurisdictions to report how they have considered the needs of youth, seniors, people with disabilities and environmental justice populations within the city or county, including minorities and low-income families.	Coalition for a Livable Future	4/27/10	Amend 3.08.120C as follows, "C. Providers of public transit service shall consider <b><u>and document</u></b> the needs of youth, seniors, people with disabilities and environmental justice populations, including minorities and low-income families, when planning levels of service, transit facilities and hours of operation."
65	RTFP Title 2: Transportation Needs	Revise 3.08.210A(3) to require jurisdictions to report how they have considered the needs of youth, seniors, people with disabilities and environmental justice populations within the city or county, including minorities and low-income families.	Coalition for a Livable Future	4/27/10	Amend 3.08.210A as follows, "3. Consideration <b><u>and documentation</u></b> of the needs of youth, seniors, people with disabilities and environmental justice populations within the city or county, including minorities and low-income families."

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
66	RTFP Title 2: Transportation Solutions	The language change in the 4/16 draft regarding consideration of multiple strategies should not apply to situations when jurisdictions determine that a capacity increase is necessary. Jurisdictions should still need to explain more specifically why strategies other than a capacity increase are not appropriate or would not address the issue. Recommendation: "...The city or county shall explain its choice of one or more of strategies below, <u>including its decision to increase capacity over use of a higher priority strategy.</u> "	Coalition for a Livable Future	4/27/10	Amend to better describe the intent of this section. See comment #21.
67	RTFP Title 2: Performance Targets and Standards	As written in Subsection A, performance targets in Subsection D are one of the alternatives to conformance with Tables 3.08-1 and 3.08-2 even though language in Subsection D indicates that the performance measures are additional requirements. Recommendation: Limit alternative standards to Subsections B and C, and clarify that Subsection D is an additional requirement and that jurisdictions must show that their solutions achieve progress toward these solutions as well.	Coalition for a Livable Future	4/27/10	Amend 3.08.230A to read as follows, "A. Each city and county shall demonstrate that solutions adopted pursuant to section 3.08.220 will achieve progress toward the targets and standards in Tables 3.08-1 and 3.08-2 <b>and performance measures in subsection D</b> or toward alternative targets and standards adopted by the city or county pursuant to subsections B, C <del>and D</del> . The city or county shall include the regional targets and standards or its alternatives in its TSP."
68	RTFP Title 2: Performance Targets and Standards	Subsection A refers to targets and standards, but does not mention performance measures, which is the term used in Subsection D. Recommendation: Correct language in either Subsection A or D to make the language consistent. (Chapter 2 of the RTP refers to the elements of Subsection D as targets.)	Coalition for a Livable Future	4/27/10	Amend 3.08.230A to read as follows, "A. Each city and county shall demonstrate that solutions adopted pursuant to section 3.08.220 will achieve progress toward the targets and standards in Tables 3.08-1 and 3.08-2 <b>and performance measures in subsection D</b> or toward alternative targets and standards adopted by the city or county pursuant to subsections B <b>and C</b> <del>and D</del> . The city or county shall include the regional targets and standards or its alternatives in its TSP."

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
69	RTFP Title 2: Performance Targets and Standards	<p>In the present draft, TSPs do not need to include performance measures/targets for all of the performance targets in the RTP.</p> <p>The targets missing are for climate change, clean air, affordability, and access to daily needs. They are all categorized under environment and equity, and the current draft includes no measures/ targets that address equity considerations. This omission goes against the current direction of the RTP and of Metro's six elements of a successful region. The region needs to start addressing issues of equity, access for all populations, air quality, and climate change, and many of the decisions on these issues happen at the local level. This language is too weak; it does not go far enough to spell out how and when the jurisdictions will accomplish the targets, how the targets will actually be measured or how shortfalls in meeting targets will be addressed.</p> <p><u>Recommendation:</u> Require TSPs to include all of the regional performance targets, but to analyze only the ones presently included. For the other targets, jurisdictions can utilize Metro's data.</p>	Coalition for a Livable Future, Willamette Pedestrian Coalition	4/27/2010, 5/4/10	No change recommended. The regional performance targets were intended to apply to the Regional Transportation Plan, with the expectation that if local governments adopted specific actions in the RTFP and Urban Growth Management Functional Plan, this would be sufficient to demonstrate progress toward the RTP targets. Each local government has a role in helping the region achieve the RTP targets, but it is unreasonable to expect all local governments to equally achieve the RTP targets due to differences in land use capacity. In lieu of requiring local governments to adopt the RTP targets, the RTFP requires TSPs to include performance measures for safety, VMT per capita, freight reliability, congestion and walking, biking and transit mode shares to evaluate and monitor TSP performance. This can be revisited as part of the next RTP update as methodologies and tools for analysis of equity, access to daily needs, greenhouse gas emissions, and affordability are further developed. Prior to the next RTP update, Metro staff will research and recommend improved evaluation tools and criteria for policy-making and priority-setting in order to better understand how low-income, minority, disabled and elderly populations are being served by transportation policies and investment decisions.
70	RTFP Title 4: Parking Management	<p>As the region considers developing BRT lines, parking ratios referencing transit should clarify that BRT be treated like LRT rather than like other buses. <u>Recommendation:</u> Language should read "one half-mile from an HCT station" rather than light rail (two instances), and language on buses should be clarified to exclude BRT.</p>	Coalition for a Livable Future	4/27/10	Amend 3.08.410A(2) as follows, "...a one-quarter mile walking distance for bus transit or one-half mile walking distance <del>for light rail</del> <b>high capacity</b> transit <b>station</b> , that area shall be added to Zone A. If 20-minute peak hour transit service is no longer available to an area within a one-quarter mile walking distance for bus transit or one-half mile walking distance <del>for from a high capacity light rail</del> transit <b>station</b> ,
71	RTFP Title 4: Parking Management	<p>Zone A parking ratios are mandatory ("shall") in some parts of the paragraph, but are weaker in other parts. To be clear and consistent about requirements, language regarding pedestrian accessible areas should be mandatory.</p> <p><u>Recommendation:</u> Change language to "Cities and counties shall designate Zone A Parking Area Ratios in areas with good pedestrian access..."</p>	Coalition for a Livable Future	4/27/10	No change recommended. A more detailed review and analysis of the regional parking management requirements will be conducted prior to the next RTP update to provide a stronger technical basis for strengthening the existing parking management requirements beyond what has been identified to date.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
72	RTFP Title 4: Parking Management	This language provides a very big loophole that could potentially blow out Parking Area Ratios. <u>Recommendation:</u> Provide more specific regional guidelines for exempting parking facilities from the parking standards.	Coalition for a Livable Future	4/27/10	Revise 3.08.410C as follows, " <b>Cities and counties shall require that free surface parking shall be subject to the regional parking maximums for Zones A and B from in Table 3.08-3. <u>Following an adopted exemption process and criteria,</u> Cities and counties may exempt parking structures; fleet parking..." Metro staff would review the process and criteria for their adequacy as part of the local adoption process. More work is needed to determine what parking management strategies should be implemented in this region and where they could be applied. This effort could define how to tailor the application of these strategies to recognize different levels of development, transit service provision and freight parking needs. This work could include updating and expanding the existing inventory of parking practices in the Metro region, and developing a parking model code and a parking "best practices" handbook to guide local implementation in the region. Functional plan amendments may also be developed as part of this effort.</b>
73	RTFP Title 7: Definitions	The definition of chicane is incomplete and does not reflect its use as a design to slow down traffic.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 4/5/10	Amend as follows, "H. "Chicane" means a <b>movable or permanent barrier used to <u>create extra turns in a roadway to reduce motor vehicle speeds or to</u></b> prevent cars from driving across a pedestrian or bicycle accessway."
74	RTFP Title 7: Definitions	The definition of deficiency is overly broad. As used in the RTFP, whether a deficiency exists depends on how a facility functions, including whether it meets operating standards in Table 3.08-2. Yet the definition of "deficiency" unnecessarily includes any time a throughway or arterial has fewer lanes than indicated in the system concept. ("Examples include throughway portions with less than six through lanes of capacity; arterial portions with less than four through lanes of capacity....") <u>Recommendation:</u> Change definition so deficiency is based on performance, not road capacity. Change examples and/or order of examples to de-emphasize capacity increase as the primary way to address deficiencies.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 5/4/10	No change recommended. Deficiencies should be based on both performance and whether the facility meets the "typical planned number of lanes" shown in Table 2.6 of the RTP. It is not intended that road capacity must be added if the facility falls below the standards in Table 3.08-2 or planned system in Table 2.6. Other provisions in the RTFP will guide whether that is the appropriate solution to address identified deficiencies.
75	RTFP Title 7: Definitions	Include a definition of High Capacity Transit.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 5/4/10	Amend as requested.
76	RTFP Title 7: Definitions	The definition of low-income families is ambiguous. Oregon DHS uses the Federal Poverty Line (FPL) as its base and has different standards depending on the program. The FPL itself is a very high threshold to be considered low-income, as it requires significantly lower income than the eligibility requirements for a number of programs. For example, Oregon WIC requires an income below 185% of FPL; CHIP is 200% of FPL.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 5/4/10	Amend as follows, "Low-income families" means households <i>with incomes at or below the Oregon Department of Health and Human Services poverty guidelines. <b>Who earned between 0 and 1.99 times the federal Poverty Level in 1999 as defined in the most recently available U.S. census.</b></i> This definition is consistent with the U.S. census definition used to identify low-income populations in the RTP background report, "Environmental Justice in Metro's Transportation Planning Process."

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
77	RTFP Title 7: Definitions	Projects defined as safety projects should come under the definition when the capacity increase is due to traffic congestion <b>in whole or in part</b> (definition now requires that safety deficiency be totally related to traffic congestion). Possibilities: use >10% increase test, or >50% due to congestion.	Coalition for a Livable Future	4/27/10	This comment is under consideration, pending further direction from Federal Highway staff.
78	RTFP Title 7: Definitions	The definition of Significant increase in SOV capacity on throughway - A greater than 10% increase in capacity to alleviate a bottleneck should not be excluded from the definition because the increase is due to auxiliary lanes (definition is now limited to general purpose lanes).	Coalition for a Livable Future	4/27/10	This comment is under consideration, pending further direction from Federal Highway staff.
79	RTFP Title 7: Definitions	Definition for bottlenecks should include <b>downstream</b> effects as well as upstream.	Coalition for a Livable Future, Fred Nussbaum	4/27/2010, 5/4/10	This comment is under consideration, pending further direction from Federal Highway staff.
80	RTFP Title 7: Definitions	Definition of Significant increase in SOV capacity on multimodal arterial - Projects defined as safety projects should come under the definition when the capacity increase is <b>partly</b> due to traffic congestion (definition now requires that safety deficiency be totally related to traffic congestion). Could use >10% increase test as with a bottleneck.	Coalition for a Livable Future	4/27/10	This comment is under consideration, pending further direction from Federal Highway staff.
81	RTFP Title 7: Definitions	Definition of SOV is broad enough to encompass bicycles, wheelchairs, etc. <u>Recommendation</u> : limit to motorized vehicles to be used in roadway.	Coalition for a Livable Future	4/27/10	This comment is under consideration, pending further direction from Federal Highway staff.
82	RTFP Title 1: Transit System Design	Check the formatting of section 3.08.120B.2 - everything there applies to <i>major</i> transit stops, so the sub-sections should be labeled a through f rather than a through c with sub-sections c, i through iv.	ODOT	4/22/10	No change recommended. As written, subsection 3.08120B2(a) and (b) apply to all transit stops and (c) applies to major transit stops.
83	RTFP Title 2: Performance Targets and Standards	Section 3.08.230E: changing the land use reference from Title 6 of the UGMFP to section 0035(2) of the TPR, which is much more general, may be OK for purposes of "demonstrating progress" (or "doing the best they can"), but it is not sufficient to be eligible for the 30% trip reduction and lower V/C ratios.	ODOT	4/22/10	No change recommended. Metro staff is developing documentation to demonstrate why a minimum 30 percent trip reduction is appropriate for Centers, Main Streets, Station Communities and Corridors if a local government as adopted the provisions called for in the RTFP and UGMFP. Title 6 discussions will continue prior to final action on the UGMFP in December 2010. The Title 6 UGMFP discussions will determine whether Corridors can be eligible for the 30 percent credit. See also comment #39.
84	RTFP Table 3.08-2: Deficiency Thresholds and Operating Standards	Table 3.08.-2 - footnote C: has not been amended since the 2004 RTP (except for changing the chapter reference). In this (2010) RTP, mobility corridor refinement plans are no longer anticipated for the specific facilities listed in the Table, with the exception of I-405 ("Stadium Freeway"). Footnote C should be removed from the Banfield (I-84), I-5 North, OR 99E, and the Sunset Hwy (US 26). Corridor Refinement Plans are still expected to consider alternative mobility corridor standards for a different set of mobility corridors.	ODOT	4/26/10	Amend as requested to delete reference to footnote C for I-5 North, OR 99E and Sunset Highway). The footnote C then would only apply to I-405 loop, I-5 (Marquam Bridge to Wilsonville), OR 8, and I-205. The mobility corridor concept is evolving and future RTP updates will reorganize Table 3.08-2 to more closely reflect the multi-modal concept established in this RTP, and recommended mobility policy for each corridor.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
85	RTFP Table 3.08-2: Deficiency Thresholds and Operating Standards	Table 3.08-2 - portions of some of the highways listed in footnote B are no longer State highways. This is true for Sandy Boulevard (we still own the segment east of I-205 within the Portland City limits), Farmington Road (we still own a small segment outside the City of Beaverton), and BH Hwy (we still own the segment in Washington County). We no longer own any segment of Hall Blvd in Beaverton, but we do own Hall Blvd in Tigard, which then changes name to Durham Rd and Boones Ferry Rd. These could be listed as "Urban Arterials that are in full or in part state highways....." since jurisdictional boundaries may change again, and some are difficult or lengthy to describe exactly (ODOT uses milepoints, not the names of intersecting streets).	ODOT	4/26/10	Amend as requested to delete footnote B – it is not needed because the mobility standard for corridors is the same whether it is an ODOT facility or a local facility.
86	RTFP Table 3.08-2: Deficiency Thresholds and Operating Standards	Table 3.08-2 - Footnote A - Revise the 2nd hour definition to be consistent with current practice, the single 60 minute period either before or after the peak 60 minute period, whichever is highest.	ODOT	4/26/10	Amend as requested.
87	RTFP Table 3.08-2: Deficiency Thresholds and Operating Standards	Table 3.08-2 - Define mid-day peak hour, such as noon-1pm or the highest 60 minute period between the hours of 10 am and 2pm.	ODOT	4/26/10	Amend as requested to define the mid-day peak hour as the highest 60-minute period between the hours of 9 am and 3pm as this is the time of day that is important to monitor to protect freight reliability. This is the evaluation period local governments are required to analyze pursuant to Title 4 of the Urban Growth Management Functional Plan.
88	RTFP Table 3.08-2: Deficiency Thresholds and Operating Standards	Table 3.08-2 - Revise state highway references to consistently refer to route numbers and/or common names.	ODOT	4/26/10	Amend as requested to consistently refer to state route numbers.
89	RTFP Table 3.08-2: Deficiency Thresholds and Operating Standards	Table 3.08-2 - Add a table note to refer to the OHP Action 1F1, which includes language about V/C standards for interchanges - basically .85 or .90. The ODOT Mobility Standards Guidelines affirms that these interchange standards apply in the Metro area, and that Table 7 applies to the mainlines.	ODOT	4/26/10	No change recommended. As a comprehensive system plan, the RTP level of analysis is at a broad system-level, and does not attempt to address localized congestion at intersections or interchanges and ramps, and as a result does not include standards for this level of analysis. In addition, the region requests the Oregon Transportation Commission and Land Conservation and Development Commission to work with Metro and other stakeholders to conduct a comprehensive and coordinated review and update to the Transportation Planning Rule, Oregon Highway Plan and mobility standards, and state procedures manuals and guidelines to more fully integrate the Oregon Transportation Plan policies and state greenhouse gas goals.

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
90	RTFP Title 2: Transportation Needs	RTFP section 3.08.210A(2): add some language in here that clarifies that "identification of facilities that exceed the deficiency thresholds" requires an operational level of analysis. the regional model on which the RTP is based does not identify intersection level deficiencies and solutions such as turn lanes and signal improvements, which are part of TSMO strategies and which are often implemented as plan amendments and development occur through SDCs. Solutions for needs identified through the intersection-level operational analysis should be included in TSPs and on lists of improvements eligible to be funded through SDCs etc, and eventually in the RTP project list. Last year's memo to the OTC about alternative mobility strategies included the principle that ODOT should still be able to require identification and implementation of such localized needs and solutions through development review.	ODOT	4/26/10	No change recommended. The TPR already defines the proportionality of the analysis required for a local and regional transportation system plans versus plan amendments. As a comprehensive system plan, the RTP level of analysis is at a broad system-level, and does not attempt to address localized congestion at intersections or interchanges. The TPR places a higher burden of proof on plan amendments to demonstrate through an operational level of analysis that the effect of the amendment will not result in further degradation from the baseline. Therefore, local governments use the RTP model as a base for an operational level of analysis to simulate the impact of the proposed land use change on the transportation system to determine the effect of the plan amendment. A local government may choose to conduct an intersection level of operational analysis as part of their TSP update to identify needs and solutions.
91	RTFP Title 1: Street System Design	Amend section 3.08.110 in RTFP to add the following, " <u>To protect the capacity, function and safe operation of existing and planned state highway interchanges, or planned improvements to interchanges, cities and counties shall, to the extent feasible, restrict driveway and street access in the vicinity of interchange ramp terminals consistent with Oregon Highway Plan Access Management Standards and accommodate local circulation on the local system to improve safety and minimize congestion and conflicts in the interchange area.</u> "	ODOT	4/28/10	Amend as requested with the following additional language in double underscore, " <u>To protect the capacity, function and safe operation of existing and planned state highway interchanges, or planned improvements to interchanges, cities and counties shall, to the extent feasible, restrict driveway and street access in the vicinity of interchange ramp terminals consistent with Oregon Highway Plan Access Management Standards and accommodate local circulation on the local system to improve safety and minimize congestion and conflicts in the interchange area. Public street connections, consistent with regional street design and spacing standards in Section 3.08.110, shall be encouraged and shall supercede this access restriction, though such access may be limited to right-in/right-out or other appropriate configuration in the vicinity of interchange ramp terminals. Multimodal street design features including pedestrian crossings and on-street parking shall be allowed where appropriate.</u> " The Oregon Highway Plan does not clearly define how to balance connectivity and access management objectives; the additional language provides additional guidance to ensure consistency with regional connectivity and street design policies that are being implemented through the RTFP, Section 3.08.110.



ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
92	RTP Projects	Remove the Tualatin Rd. extension across the Tualatin River providing a direct connection to I-5 (Project #10731). On April 26, 2010, the Tualatin City Council unanimously agreed to withdraw its support for this project due to growing public opposition to the project. The city will conduct more detailed traffic analysis and public involvement regarding this project during the City's transportation system plan (TSP) update.	City of Tualatin, Toni Anderson, Michael Klenz, Charles Fedel, Gary Green, Bob and Kathy Newcomb, Dolores Hurtado, Jerry and Jan Larsen, Aimee McAuliffe, Jim Milne, George Vigileos, Reba Tobey, Elizabeth Piazza, Kathy Rayborn, Greg Doering, David Allen, Jan Giunta, Gail Here, Ida Solomonik, Jeff Welsh, Steve and Wendy Hall, Carol Diforio, Star Fuji, Diane Ross, genrikh koyfman, Emil Koyfman, Jodie Chrisman, Glenn and Martha Bailey, Alex Reid, Rowena and Randy Hill, John Scott, James O. Estes, Gary Thompson, Barbara Kelleher, Dwight Raikoglo, Deborah Stewart, Sharla Wyland, Dian Leth, Carol & John Cesnalis, Kip and Molly Nix, Bob Barnes, Pat Carroll, Larry McClure, Marius Brisan, Christine Turnstall, Nancy Schmidt, Edward Bartlett, Cathy Holland	4/28/10, 5/3/10, 5/4/10, 5/5/10, 5/6/10	Amend as requested, deleting Project #10731 from the RTP project list in Appendix 1 and deleting the project "general location" from Figure 2.10 (Regional Design Classifications) and Figure 2.12 (Arterial and Throughway Network). Chapter 4 of the RTP will also be amended to describe inadequate access and connectivity via the current bridge across the Tualatin River into the Tualatin Town Center and the industrial district that should be addressed in the Tualatin TSP update. The city will recommend a replacement project(s) for inclusion in the RTP upon completion of the TSP update.
93	RTP Projects	Revise the description for Project #10598 to reflect JPACT and Council action on December 10, 2009.	Metro staff	5/3/10	This is a technical correction, the project description should read as follows, " <u>Purchase right-of-way <b>when all project conditions are met: including integration with land use plans for UGB expansion areas and Urban Reserves, conducting the I-5 South Corridor Refinement Plan, including Mobility Corridors 2, 3 and 20, and resolution of access between I-5 and southern arterial with no negative impacts to I-5 and I-205 beyond the forecast No-Build condition, addressing NEPA to determine the preferred alignment and addressing any conditions associated with land use goal exception for southern arterial.</b></u> " This project is a placeholder and is not part of the RTP until a goal exception has been adopted through a local comprehensive plan. The responsible agency for adopting a goal exception is the county (or counties) with planning responsibility for the area where the proposed facility would be located.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
94	RTP Projects	Revise the description for Project #11339 to reflect JPACT and Council action on December 10, 2009.	Metro staff	5/3/10	This is a technical correction, the project description should read as follows, "Construct the initial 2-3 lane phase of the Southern Arterial from Hwy 99W to the SW 124th Extension <b><u>when all project conditions are met: including integration with land use plans for UGB expansion areas and Urban Reserves, conducting the I-5 South Corridor Refinement Plan, including Mobility Corridors 2, 3 and 20, and resolution of access between I-5 and southern arterial with no negative impacts to I-5 and I-205 beyond the forecast No-Build condition, addressing NEPA to determine the preferred alignment and addressing any conditions associated with land use goal exception for southern arterial.</u></b> " This project is a placeholder and is not part of the RTP until a goal exception has been adopted through a local comprehensive plan. The responsible agency for adopting a goal exception is the county (or counties) with planning responsibility for the area where the proposed facility would be located.
95	RTP Projects	Revise the description for Project #11340 to reflect JPACT and Council action on December 10, 2009.	Metro staff	5/3/10	This is a technical correction, the project description should read as follows, "Expand to 4-5 lanes to serve growth in the area after improvements to Tualatin-Sherwood Road and an improved connection from Sw Tualatin Road to the I-5/Lower Boones Ferry Interchange <b><u>and when all project conditions are met: including integration with land use plans for UGB expansion areas and Urban Reserves, conducting the I-5 South Corridor Refinement Plan, including Mobility Corridors 2, 3 and 20, and resolution of access between I-5 and southern arterial with no negative impacts to I-5 and I-205 beyond the forecast No-Build condition, addressing NEPA to determine the preferred alignment and addressing any conditions associated with land use goal exception for southern arterial.</u></b> " This project is a placeholder and is not part of the RTP until a goal exception has been adopted through a local comprehensive plan. The responsible agency for adopting a goal exception is the county (or counties) with planning responsibility for the area where the proposed facility would be located.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
96	RTP Projects	Revise the description for Project #11342 to reflect JPACT and Council action on December 10, 2009.	Metro staff	5/3/10	This is a technical correction, the project description should read as follows, "Connect the Southern Arterial to I-5 or other surface arterials in the vicinity of the I-5/North Wilsonville Interchange <b>when all the project conditions are met: including integration with land use plans for UGB expansion areas and Urban Reserves, conducting the I-5 South Corridor Refinement Plan, including Mobility Corridors 2, 3 and 20, and resolution of access between I-5 and southern arterial with no negative impacts to I-5 and I-205 beyond the forecast No-Build condition, addressing NEPA to determine the preferred alignment and addressing any conditions associated with land use goal exception for southern arterial.</b> " This project is a placeholder and is not part of the RTP until a goal exception has been adopted through a local comprehensive plan. The responsible agency for adopting a goal exception is the county (or counties) with planning responsibility for the area where the proposed facility would be located.
97	RTP Projects	Update RTP projects 10022, 10041, 10042, 10052, 10869, 10890, 10894, 11347, 11349, and 11350 to clarify project element descriptions and termini to be consistent with the Sunrise Project FEIS Preferred Alternative. These changes are consistent with the RTP air quality conformity assumptions.	ODOT	5/5/10	Amend as requested.
98	RTP Projects	Appendix 1.1 Project List -RTP #10613 – Project end location should be 119th Ave. not 117th Ave.	Washington County	5/6/10	Amend as requested
99	RTP Projects	Appendix 1.1 Project List #10601 – Project description for Hwy. 26/Bethany Interchange improvements should read as follows: " <b>Rebuild overpass to accommodate additional northbound through-lane and bike lanes. Construct additional lane on collector-distributor road allowing for dual right-turn lanes onto northbound Bethany Boulevard. Construct additional westbound exit ramp lane and shoulder at Cornell exit. Cost should be increased to \$12 million to be consistent with current Authorization request.</b> "	Washington County	5/6/10	Amend as requested.
100	RTP Projects	Appendix 1.1 Project List -- Washington County, not Hillsboro, is the correct facility owner/operator for Farmington projects #11285 and #11284.	Washington County	5/6/10	Amend as requested.
101	RTP Projects	Appendix 1.1 Project List --Add Farmington to 198th improvements: 185th Ave. to 198th Ave., widen from two to three lanes with bike lanes and sidewalks, \$17,326,000, 2008-2017 (#10574) back to Financially Constrained list	Washington County	5/6/10	Amend as requested. This is consistent the conformity determination.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
102	RTP Projects	OR 217 -• Revise Project #10875 (\$79.6 million in the federal RTP) to reflect more recent recommendations that have come from the OR 217 Interchange Management Study and add back the full OR 217 project to the RTP Investment Strategy (Appendix 1), with a revised estimated cost of \$414.7 million. Amend the financial assumptions in the State RTP to include tolling revenue in the amount of \$340 million, which combined with the \$74.7 million that remains under the Washington County funding target achieves the cost/revenue balance. The tolling revenue assumption is consistent with the range identified in the OR 217 Corridor Study recommendations (Note: state RTP projects 10599 (72nd/217 – \$19.5 million) and 11302 (I-5/217 - \$50 million) should remain the same). These modifications would effect the modeling assumptions for this corridor. The operational improvements would be part of the financially constrained system (consistent with the draft RTP). The full six-lane OR 217 project would only be assumed on the State RTP system project list and for the purposes of modeling would include tolling. The project description should be revised to reflect this and acknowledge that future project development activities will consider tolling, other operational improvements and use a least cost planning and practical design approach to define the longer-term improvement for this corridor.	Washington County	5/6/10	This comment is under consideration, pending further direction from ODOT staff.
103	RTP Projects	The SWNI priorities for improvements to Barbur Blvd are on the state list (#10283 and 10285). We recommend that Slavin Rd. connection between Barbur and the Gibbs St. Ped bridge be included in the Barbur scope. We recommend that Barbur projects be placed on the FC list.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. Project #10283 is included in the federal priorities list of projects. The comment on Project #10285 has been forwarded to the City of Portland for consideration as part of their TSP update.
104	RTP Projects	We recommend that the Barbur Bridges project #11324 be seperated into 2 projects, so the projects that are urgently needed to complete gaps.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. This comment has been forwarded to ODOT for consideration in their upcoming State Transportation Improvement Program (STIP).
105	RTP Projects	We recomend the following projects (currently in Portland's TSP) be included in the RTP: SW Huber (including improvements on 40th connecting Huber to the existing ped bridge over I-5), SW 19th, SW 26th, and SW Spring Garden.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. This comment has been forwarded to the City of Portland for consideration as part of their TSP update.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
106	RTP Projects	The BTA finds that the RTP project list fails to meet the recommendations of Metro's own Making the Greatest Place guiding principles. The BTA understands that the "no build" scenarios gets the region closest to meeting GHG goals that the "full-build" RTP scenarios. These issues need to be addressed prior to moving forward. Metro should ensure that all local jurisdictions adopt and put forward project plans that reflect the new policy goals of the RTP and provide a much more rigorous screening criteria by which projects must pass to make the RTP project list.	Bicycle Transportation Alliance	5/6/10	No change recommended. The 2009 Legislature required Metro to "develop two or more alternative land use and transportation scenarios" designed to reduce GHG emissions from light-duty vehicles by January 2012 through HB 2001 (Sections 37 and 38). It also requires Metro to adopt one scenario that meets the state targets after public review and comment. Finally, local governments are required to adopt comprehensive plan and land use regulations consistent with the adopted scenario. Transportation infrastructure, transportation pricing, technology and land use are part of the solutions recommended by the draft RTP. The effect of more aggressive application of each these strategies will be tested as part of the HB 2001 land use and transportation scenarios in 2010. The Regional Transportation Functional Plan will direct how local transportation system plans must be updated to be consistent with the new RTP. With JPACT and Council direction, staff will propose a more rigorous <u>screening process for projects in the next RTP update.</u>
107	RTP Projects	Many projects in the RTP mention improvements to the bicycle and pedestrian network but are primarily road projects that include minimal or the legally required improvements. Inclusion of bike/ped elements in descriptions may indicate merely that mentioning alternative modes in a project is likely to be viewed favorably, although the actual investment may be incidental to the overall scale of the project. Metro should have more detailed information on the breakdown of project costs.	Bicycle Transportation Alliance	5/6/10	No change recommended. Chapter 3 was significantly updated from the 2009 public review draft to include more detailed information on project costs by mode. Less than half of the arterial projects proposed in the RTP are widening projects designed to include vehicle capacity (196 projects out of 549 road projects). More than 190 projects are street reconstruction and boulevard retrofits that do not add vehicle capacity. See pages 3-24 in the RTP for a more detailed summary of the types of road projects that are proposed.
108	RTP Projects	Concerned that the BRT option on the Powell Blvd HCT corridor is being finalized as a part of this plan without studying which investment makes the most sense. Powell Blvd should have investments made that does not impede the current capacity.	Ray Whitford	5/6/10	No change recommended. Powell Blvd. was identified as a near-term priority corridor as part of the High Capacity Transit (HCT) plan. Although the analysis of all of the corridors assumed light rail transit for comparative purposes, the HCT plan does not prescribe a specific modal type for any corridor. The type of HCT (Light Rail Transit, Bus Rapid Transit, Rapid Streetcar, etc.) is determined through the alternatives analysis process. The alternatives analysis for the Powell corridor has not started.
109	RTP Projects	In Beaverton, to improve traffic flow there is a proposal to extend 125th Ave through a greenspace from Greenway to Hall Blvd. We are concerned that this road will be built as it is unnecessary: it would create too many arterial roads in the same location, other large roads run almost exactly parallel to it providing adequate transport; other major arterials could be improved to prevent traffic congestion instead of paving this uncommon forested area of Beaverton. We hope this proposal is not in the 2035 Plan and wish to express the opposition of hundreds of Beavertonians to this project.	Cindy Kimble	5/6/10	No change recommended. RTP Project #10635 was submitted by the City of Beaverton as a financially constrained project. Beaverton is in the process of finalizing a TSP update. This process reevaluated the 125th Ave. project and assessed it as a high priority project.

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
110	RTP Projects	The RTP makes the case for environmental, community and economic benefits of building "efficient urban form" by building and connecting key employment, shopping, civic and cultural destinations with an eye to facilitating bicycle, ped and transit access. When you get into Chapter, one finds that for many Washington County centers and corridors, the 2035 Federal Priority system would have no impact on or even decrease SOV mode share. This is reflected in the project list.	Damian Miller	5/6/10	No change recommended. This comment has been forwarded to Washington County for consideration as part of their TSP update.
111	RTFP - General comments	The functional plan needs to be strengthened to require all jurisdictions to meet the intent of the plan, with few exceptions. All local transportation plans need to include streets with ped/bike paths that connect with essential destinations, ADA compliant access to major transit stops and stronger consideration of how small infill development affect livability when not accompanied by appropriate infrastructure improvements.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. The functional plan applies to all local governments in the region. In addition, other state and federal requirements regarding ADA-compliant access guide the design of facilities.
112	RTFP Intent	Revise to describe the purpose of the RTP performance targets and standards and recognize that the analysis required for each TSP may vary given the complexity of transportation issues within the local planning area and the data and methods available to conduct such an analysis	TPAC	4/30/10	Amend as follows, "A. <u>The Regional Transportation Functional Plan (RTFP) implements those policies of the Regional Transportation Plan (RTP)...</u> <b>The Regional Transportation Plan establishes an outcomes-based framework that is performance-driven and includes policies, objectives and actions that direct future planning and investment decisions to consider economic, equity and environmental objectives.</b> The principal performance objectives of the RTP are .... <b>Metro and its regional partners will continue to develop a regional data collection and performance monitoring system to better understand the benefits and impacts of different actions relative to the RTP performance objectives. Local plan updates and amendments should rely on Metro data and tools or other locally-developed data and tools, when practicable. Through performance evaluation and monitoring the region can be a responsible steward of public funds and be more accountable and transparent about local and regional planning and investment choices.</b> B. <b>The Regional Transportation Functional Plan (RTFP) implements those policies, objectives and actions of the Regional Transportation Plan (RTP) and its constituent freight, high-capacity transit and transportation system management and operations plans which cities and counties of the region will carry out in their comprehensive plans, transportation system plans (TSPs), other land use regulations and transportation project development. Local implementation of the RTP will result in a more comprehensive approach for implementing the 2040 Growth Concept, help communities achieve their aspirations for growth and support current and future efforts to achieve the principal objectives of the RTP and address climate change.</b> C..."

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
113	RTFP Title 1: Street System Design	3.08.110 (B)(1) states that City and County local street design regulations shall allow implementation of "pavement widths of less than 28 feet from curb-face to curb-face." The original language stated that City and County street design regulations shall allow "...pavement widths of no more than 28 feet from curb-face to curb-face." The intent was to delete the restriction in the original language. The old and new language should be deleted from the final RTFP.	City of Gresham	5/6/10	No change recommended. This language requires local governments to allow implementation of "skinny streets," where appropriate and does not preclude implementation of wider curb-to-curb widths when using "green street" designs.
114	RTFP Title 1: Transportation System Design	Section 3.08.110(C) - Existing C should be moved up to A, and existing A and B should become B and C. The new A (former C) should end ". . . <b>each city and county should, as necessary and to the extent practicable, amend its Transportation System Plan, Comprehensive Plan, land use regulations, project lists, and other implementing measures to comply with the requirements set forth in Sections B through G of this section.</b>	City of Portland	5/6/10	Amend to delete 3.08.110 (C). This provision is not needed as it only introduce subsections D through G and articulates some purposes for each of those subsections. Subsections D, E, and F have their own statement of purpose. The "extent practicable" wording is not recommended. To make a determination of whether something is "practicable" requires an additional step that is not warranted. Compliance determinations will be based on an assessment of whether the TSP and implementing regulations "substantially comply" with the RTP.
115	RTFP Title 1: Transportation System Design	Section 3.08.110(C) This will allow elimination of confusing language in the various sections that are similar but different from one simple "amend to comply" standard. Examples of these variants that should be eliminated include: "shall allow implementation of," "shall incorporate into it TSP," and ," "shall incorporate into it TSP to the extent practicable."	City of Portland	5/6/10	Amend as appropriate given the intent of each clause; each clause has a different legal connotation.
116	RTFP Title 1: Transportation System Design	Section 3.08.110 (D) Remove reference to number of lanes, i.e. "four-lane" or "two-lane", and instead refer to the RTP Table 2.6 Arterials and Throughway Design Concepts (p. 2-29 to 2-30). The table describes the number of lanes as "planned" – not standard – but may vary based on ROW constraints or other factors	City of Portland, Washington County	5/6/2010, 5/6/10	Amend as requested to remove specific lane number references and to add a reference to Table 2.6 in Chapter 2 of the RTP. See comment #3 and #54.
117	RTFP Title 1: Transportation System Design	Section 3.08.110 F -We believe these regulations are intended to apply to the "parcels of five acres or more" identified in 308.110E. However, the way it is formatted, it reads like it would apply to wherever a new street was constructed. 308.110F should be a subset of E so these requirements only apply to the parcels of 5 acres or more.	Washington County	5/6/10	Amend as requested.
118	RTFP Title 1: Transportation System Design	Section 3.08.110 (Street System Design),item F. 3 states that "City and county street design regulations shall allow: Sidewalk widths that include at least five feet of pedestrian through zones". This should be a minimum requirement, not an allowance.	Willamette Pedestrian Coalition	5/3/10	No change recommended. This provision means that city and county street standards have to allow 5 feet as a minimum and as such is a minimum requirement.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
119	RTFP Title 1 Transportation System Design	Section 3.08.120 (Transit System Design), item A, only addresses existing service. Shouldn't local governments also thinking about planned transit service outside of Station areas?	Fred Nussbaum	5/4/10	Amend as requested. "City and county TSPs or other appropriate regulations shall include investments, policies, standards and criteria to provide pedestrian and bicycle connections to <del>all</del> <b>existing</b> transit stops <b>and major transit stops designated in Figure 2.15 of the RTP</b> <del>where regional transit service exists at the time of TSP development or update, and all existing or planned Station Communities.</del> This amendment replaces the recommendation in comment #9.
120	RTFP Title 1: Transportation System Design	Section 3.08.120 A – We are supportive of the intent of this section, but tying land use regulations directly to a "transit stop" can create problems. It sets up the situation where moving a transit stop becomes a quasi-judicial or legislative plan amendment. We would prefer having 3.08.120 A. read something like "..... <b>bicycle connections to all streets where regional transit service exists at the time of TSP development....</b> "	Washington County	5/6/10	See recommendation in comment #119.
121	RTFP Title 1: Transportation System Design	Section 3.08.120 B.2.b. – Providing pedestrian crossings at all transit stops will be problematic along many arterials with long blocks (think TV Highway). Should be some "practicability" provision here ... (e.g. insert "... <b>and practicable</b> ..." after "improvements as needed ..." in this sub-section.	Washington County	5/6/10	Amend as requested.
122	RTFP Title 1: Transit System Design	Item 3.08.120(B)(2)b should become a subsection of B.2.c because it only refers to major transit stops.	Fred Nussbaum	5/4/10	Amend as requested to move "Make intersection and midblock traffic management improvements as needed to enable marked crossings at major transit stops." to become 3.08120(B)(2)(c)(v.)
123	RTFP Title 1: Transit System Design	Item 3.08.120(B)(2)b - providing pedestrian crossings at all stops will be difficult on arterials will longer block spacing, such as Tualatin Valley Highway. Insert "and practicable" to provide some flexibility for these types of treatments.	Washington County	5/6/10	Amend as requested to move "Make intersection and midblock traffic management improvements as needed <b>and practicable</b> to enable marked crossings at major transit stops."
124	RTFP Title 1 Transportation System Design	Section 3.08.120 (Transit System Design) item C, strengthen language to be as prescriptive as that applied to local jurisdictions. Include standards for frequency, stop spacing, coverage, maximum walking distance to stops, hours of operation and maximum transit/auto travel time ratios for priority trip purposes, etc.	Fred Nussbaum	5/4/10	No change recommended. This is not appropriate for a functional plan.
125	RTFP Title 1 Transportation System Design	Section 3.08.130 (Pedestrian System Design) item A.4, Address pedestrianways parallel to controlled access roadways. There should be a pedestrian route parallel to freeways - either along a parallel street or along a pathway.	Fred Nussbaum	5/4/10	No change recommended. The Oregon Transportation Planning Rule explicitly states that sidewalks are not required along controlled access roadways (freeways). The RTP mobility corridor concept (RTP chapter 2, Figure 2.7) envisions bicycle parkways parallel to regional throughways (e.g. freeways). Some bicycle parkways would be designed as multi-modal facilities including bicyclists and pedestrians. Future work is needed to determine whether Metro should require a bicycle parkway along every regional throughway.



## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
126	RTFP Title 1: Transportation System Design	Section 3.08.130 (Pedestrian System Design) states that city and county TSP's shall include a pedestrian plan, but does not require such plans to be updated on timely basis nor does it require any jurisdictions to provide timelines for completion of their inventories and pedestrian needs evaluations.	Willamette Pedestrian Coalition	5/3/10	No change recommended. Pedestrian inventories and needs analyses must be updated every time a TSP is updated per the Transportation Planning Rule.
127	RTFP Title 1: Transportation System Design	WPC supports 3.08.130 C. in the RTFP: City and county land use regulations shall ensure that new development provides "reasonably" direct routes for pedestrian travel. This is equally important for smaller infill development (under 5 acres in size). Pedestrian access requirements should not be waived, regardless of development size.	Willamette Pedestrian Coalition	5/3/10	No change recommended. Section 3.08.130 C. does not state that pedestrian access requirements should be waived for development on sites under 5 acres in size. The only requirement in the RTFP that mentions 5 acres is section 3.08.110 (Street System) item E, which requires a conceptual street plan for contiguous areas of vacant and redevelopable lots and parcels of five or more acres that are zoned to allow residential or mixed-use development.
128	RTFP Title 1 Transportation System Design	Section 3.08.130 (Pedestrian System Design) Add standards to specify under what circumstances a pedestrian crossing at an intersection can be denied. Frustrated/desperate transit patrons will do dangerous things to try to catch their bus.	Fred Nussbaum	5/4/10	No change recommended. This is not appropriate for the functional plan. Guidance for pedestrian crossing locations may be considered in upcoming update to regional street design guidelines.
129	RTFP Title 1 Transportation System Design	Section 3.08.130 (Pedestrian System Design) Add standards for pedestrian-actuated signals (appropriate and inappropriate intersections, button location, cycle lengthening, maximum wait time, button orientation. Circumvention of pedestrian signals, due to pedestrian frustration with long wait times, causes major safety issues.	Fred Nussbaum	5/4/10	No change recommended. This is not appropriate for the functional plan. Guidance for pedestrian-actuated signals may be considered in upcoming update to regional street design guidelines.
130	RTFP Title 1: Transportation System Design	Section 3.08.130 (Pedestrian System Design) describes the "provision for" sidewalks along arterials or safe, controlled crossings of arterials. The phrase "provision for" lacks the strength needed to actually make these improvements a reality. Our perception is that most arterial improvement projects in the Technical Appendix / project list are road widening projects designed to increase vehicle capacity. Addition of sidewalks and bike lanes is required, but do not create an environment friendly to walking and cycling. Great distances between signalized crossings and short walk signal timing make these types of streets very dangerous for pedestrians.	Willamette Pedestrian Coalition	5/3/10	No change recommended. This language is consistent with the Transportation Planning Rule. In addition, less than half of the arterial projects proposed in the RTP are widening projects designed to include vehicle capacity (196 projects out of 549 road projects). More than 190 projects are street reconstruction and boulevard retrofits that do not add vehicle capacity. See pages 3-24 in the RTP for a more detailed summary of the types of road projects that are proposed.
131	RTFP Title 1: Transportation System Design	Section 3.08.130 (Pedestrian System Design), Item B states that jurisdictions "may" implement the provisions of 3.08.120 B (2) to establish pedestrian districts. This language is confusing because 3.08.120 B applies to land use regulations that include elements to leverage transit investment and there is no B (2) listed in this section.	Willamette Pedestrian Coalition, Fred Nussbaum	5/3/2010, 5/4/10	Amends as Follows "B. <b>As an alternative to implementing section 3.08.120B</b> , <del>A</del> a city or county may <del>implement the provisions of section 3.108.120B (2) by</del> establishment of a pedestrian districts in its comprehensive plan or land use regulations. <del>The regulations shall include</del> <b>with</b> the following elements:"

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
132	RTFP Title 1 Transportation System Design	Section 3.08.140 (Bicycle System Design) Address bikeways parallel to controlled access roadways.	Fred Nussbaum	5/4/10	No change recommended. The RTP mobility corridor concept (RTP chapter 2, Figure 2.7) envisions bicycle parkways parallel to regional throughways (e.g. freeways). Future work is needed to determine whether a bicycle parkway should be required along every regional throughway. This work will be conducted as part of the Active Transportation Action Plan called for in Chapter 6 of the RTP.
133	RTFP Title 1 Transportation System Design	Section 3.08.140 Bicycle System Design- Change "Provision for bikeways along arterials, <i>and major</i> collectors <b>and local streets</b> ... (parallel language to 3.08.130.A.4)	City of Portland	5/6/10	Amend as requested. This recommendation replaces comment #16.
134	RTFP Title 1 Transportation System Design	Section 3.08.130/140/150 Ped, Bicycle and Freight System Design- City and county TSPs shall include a pedestrian plan. Portland has adopted master plans for each mode and modal classifications and policies are incorporated into the Transportation Element of the TSP. Chapter 5 of the TSP contains the Modal Plans. Having this in the TSP seems redundant to the adopted master plans.	City of Portland	5/6/10	No change recommended. The provisions, as written, do not limit master plans from being adopted separately from a TSP.
135	RTFP Title 2 Development and Update of Transportation System Plans	Washington County staff are not very comfortable with adopting Chapter 4 by ordinance and would like to discuss the possibility of recommending adoption by Resolution and Order. We believe Metro could be consistent with the TPR without adopting Chapter 4 as a land use decision. While the Mobility Corridor work that has been done to date is a good first step, we believe it isn't developed enough at this point to enable local governments to clearly understand its implications or to develop TSPs that are consistent with the work as it stands.	Washington County	5/6/10	Amend RTFP Section 3.08.210 to add a new subsection as follows, " <b><u>When determining its transportation needs under this section, a city or county shall consider the regional needs identified in the mobility corridor strategies in Chapter 4 of the RTP.</u></b> " and remove the following provision from subsection B " <i>Regional needs identified in the mobility corridor strategies of Chapter 4 of the RTP.</i> "
136	RTFP Title 2 Development and Update of Transportation System Plans	Section 3.08.220 (Transportation Solutions) TSMO should be moved to #3 position, since it can often increase system capacity by spreading traffic volumes around, thereby creating traffic impacts (albeit in a less onerous way than building additional capacity).	Fred Nussbaum	5/4/10	No change recommended.
137	RTFP Title 2 Development and Update of Transportation System Plans	Section 3.08.220 (Transportation Solutions) Improvements to parallel arterials, etc. should move to #4 position, since land use changes take longer to have effect.	Fred Nussbaum	5/4/10	No change recommended.
138	RTFP Title 1: Transportation Solutions	<b><u>3.08.220 Subsection A(1):</u></b> Revise as follows, "TSMO <b><u>strategies investments, including localized TDM, signal timing, safety, operational and access management improvements</u></b> <i>that refine or implement regional strategies in the RTP...</i> " to better reflect the range of TSMO strategies that should be considered and recognize some strategies may be more localized in nature and not explicitly identified in the Regional TSMO plan.	TPAC, City of Portland	5/4/2010, 5/6/10	Amend as requested.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
139	RTFP Title 1: Transportation System Design	Section 3.08.220 (Transportation Solutions) states that jurisdictions shall be required to explain their choice of a lower priority strategy, but it is not clear to whom or how the explanation will be provided. This information should be made part of the public record whenever exceptions are granted.	Willamette Pedestrian Coalition	5/3/10	No change recommended. The explanation would be included in the city or county TSP or locally-adopted findings of consistency with the RTP.
140	RTFP Title 2: Development and Update of TSPs	Section 3.08.220 (A) Transportation Solutions-indicates that strategies should follow a particular order. It would be better (and more flexible) to indicate that 1-4 should be used before capacity improvements	City of Portland	5/6/10	No change needed. This is indicated in provision as amended in comment #21.
141	RTFP Title 2: Development and Update of TSPs	Section 3.08.220 (A)(5) Change "Improvements to parallel...consistent with the connectivity standards in section 3.08.110 <b>and street classifications</b> , in order to provide alternative routes..."	City of Portland	5/6/10	Amend as follows, "...and <b>design classifications in Section 2.5.1 of the RTP</b> ..." See recommendation in comment #142.
142	RTFP Title 2: Development and Update of TSPs	Section 5. 3.08.220 A. 5 and 6 The relationship and interaction of these two "solutions" (5 and 6) is a bit awkward and needs clarification to avoid unnecessary confusion when these analyses are undertaken. If "improvements" referenced in 5 are those that ensure connectivity is up to snuff and that all modes are addressed on parallel facilities then that should be clarified. If "improvements" has a broader meaning that includes capacity improvements on parallel facilities, then the interplay between 5 and 6 becomes circular; that is, add capacity on a parallel facility so you don't have to add it on the one you're looking at. Do the same analysis on the parallel facility and you're looking back at the one you started with.	Washington County	5/6/10	Amend as follows, "5. <b>Connectivity</b> improvements to <b>provide</b> parallel arterials, collectors and local streets, <del>including that include</del> pedestrian and bicycle facilities, consistent with connectivity standards in section 3.08.110 <b>and design classifications in Section 2.5.1 of the RTP</b> , in order to provide alternative routes of travel <del>or and</del> <b>encourage walking, biking and access to transit use of modes other than SOV.</b> "
143	RTFP Title 2: Development and Update of TSPs	3.08.220A -Section 5 should clarify that parallel facilities' improvements should be found to be cost-effective alternatives that both meet the stated objective of encouraging modes "other than SOV" but which also solves the problem, "need" or performance objectives being addressed in the first place	Washington County	5/6/10	No change recommended. This is the intent of the existing language.
144	RTFP Title 2: Development and Update of TSPs	3.08.220A - Section 6 should clarify that making capacity improvements "... consistent with the RTP Arterial and Throughway Network Concept..." includes an understanding that in some circumstances "additional through lanes beyond the planned system" may be considered (See RTP: second paragraph, page 2-34 for further description.)	Washington County	5/6/10	Amend this section as follows, "Motor vehicle capacity improvements, consistent with the Arterial and Throughway <b>Design and Network Concepts in Table 2.6 and Section 2.5.2 of the RTP</b> ..." This is already addressed in 3.08.510(D) for plan amendments.

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
145	RTFP Title 2: Transportation Solutions	6. 3.08.220 C -- We believe the application of this section will create some confusion. 3.08.210 A has been clarified to confirm that local TSPs can use the RTP as a baseline for state and regional needs and focus on local needs. 3.082.20 C then directs local governments on how to proceed when they discover state or regional needs that are unmet in the RTP. This would be clear enough in an RTP in which known state and regional needs are addressed. However, since projects or solutions to needs identified in the 2035 RTP are capped by funding assumptions, not all needs are addressed. In other words, there are two types of unmet state and regional needs: 1) new and previously unidentified, or 2) already known and not included in the RTP because of the funding cap. While it makes sense for Metro and local governments to address the first category of unmet needs (the unanticipated needs) through mechanisms identified in 3.08.220 D, we should not need to go through this process for the second category of unmet needs (anticipated but outside the funding cap). The distinction should be clarified in the RTP and RTPFP so that local governments are not put in the position of having to develop or propose responses to modify the RTP to address already known but unmet needs as part of their TSP development processes.	Washington County	5/6/10	Amend subsection C as follows, "If analysis under subsection 3.08.120A indicates <b>a new</b> regional or state need that has not been <b>identified</b> <i>addressed</i> in the RTP, the city or county, <i>shall</i> <b>may</b> propose one of the following actions..." There is not a one-to-one relationship between needs and projects in the RTP. Under the 2006 TPR amendments, the threshold for an adequate transportation system is "doing the best we can" and "improve performance as much as feasible" to make progress toward the RTP performance targets and standards by implementing all feasible actions and projects.
146	RTFP Title 2: Transportation Solutions	The implied purpose of 3.08.220 D -- to "balance" the RTP through mechanisms described in its four strategies -- may seem sensible in an RTP that is in balance in the first place (i.e., solutions identified for all needs), but the 2035 RTP is not in balance in this sense. Direction to use 3.08.220 D strategies suggests, in effect, that the "cap" imposed by the 25-year funding assumptions in the plan should be the controlling constraint -- that we should be more willing to make adjustments contemplated in the strategies (land-use, policy, etc.) than to reconsider long-term funding assumptions. We question whether this is appropriate. Whether it is a good thing or a bad thing, it should be made clear that local governments are not required to address this section for unmet regional needs already in the RTP.	Washington County	5/6/10	Amend to delete subsection D. The strategies identified apply to plan amendments under OAR 660-012-0060 to balance land use and transportation, and do not need to be included in the RTFP. See also recommendation in comment #145.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
147	RTFP Title 2 Performance Targets and Standards	Page 6-22 of the RTP says the direction is to "retain current mobility standards," yet RTFP Table 3.08-2 – Interim Regional Mobility Policy changes the standard from level of service standards to volume/capacity ratios. It is unclear how an evaluation of this standard might work. (Note: Given the 1.1 standard, shouldn't it be "demand/capacity" rather than volume/capacity, since volume can't exceed capacity?) We know there is a need to reflect ODOT standards in the RTP. We recommend that on an interim basis we a) change the mobility policy only for ODOT facilities and b) keep the "letter standards" for non-ODOT facilities in place. More time is needed to review and this does not seem consistent with the direction that the region will retain the current mobility standards for the this RTP.	Washington County	5/6/10	No change recommended. The letter grades for level-of-service (LOS) are based on volume-to-capacity ratios as defined in the Highway Capacity Manual. Converting the "letter grades" to "ratios" provides more specificity about what the mobility standard is, and does not represent a change to the region's mobility policy. This change is consistent with how ODOT applies the mobility standards through the Transportation Planning Rule and the Oregon Highway Plan. Local governments may choose alternative standards pursuant to 3.08.230 B.
148	RTFP Title 2 Performance Targets and Standards	Table 3.08-1 Regional Modal Targets - Needs more information to specify that modal targets represent the non-SOV average "daily" weekday trips for year 2035 -Non-SOV Modal Targets are an inadequate alternative standard under the TPR. They are hard to measure. We should have total VMT reduction targets and multi-modal targets for each of the 2040 design types, for at least the modes requiring a system plan under Title 1. -More targets based on the 2035 RTP policy, particularly greenhouse gas reduction.	City of Portland	5/6/10	Amend Title of Table 3.08-1 as requested, adding the word " <b>daily</b> ." No change recommended to the Non-SOV modal targets. The City may adopt other targets as part of the TSP.
149	RTFP Title 2 Performance Targets and Standards	Table 3.08-2 Interim Regional Mobility Policy- • We understand that the Areas of Special Concern designation is being eliminated since the same flexibility currently reserved for areas with the highest density (based on required actions) is now being extended to all other areas within the region. Vehicular LOS or V/C based standards are not appropriate for the Central City or Regional Centers • V/C standards don't account for through traffic (or non district generated traffic) which penalizes centrally located areas.	City of Portland	5/6/10	No change recommended. The city may adopt alternative standards pursuant to 3.08.230B.
150	RTFP Title 2: Development and Update of TSPs	Section 3.08.230 B.2– We would insert language ahead of this provision to clarify what we believe is the intent here, as follows: " <b>Unless demonstrated to be necessary under 3.08.220 A.6,</b> <del>W</del> will not result in a need for motor vehicle	Washington County	5/6/10	No change recommended. See recommendation in comment # 144. Section 2.5.2of the RTP allows for this anddescribes the type of analysis required.
151	RTFP Title 2: Development and Update of TSPs	Section 3.08.230 (C)(1) Performance Targets and Standards- Change sentence to "Are no lower than <del>#</del> ose <b>the modal targets</b> in Table 3.08-1." <b>targets</b> in Table 3.08-1."	City of Portland	5/6/10	Amend as requested and also read "Are no lower than <del>#</del> ose <b>the modal targets</b> in Table 3.08-1 and <b>no lower than the ratios</b> in Table 3.08-2." to clarify the intent of this subsection.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
152	RTFP Title 2: Development and Update of TSPs	Section 3.08.230 (C) Performance Targets and Standards- This title should expressly authorize local governments to adopt alternative mobility standards within designated mobility corridors and special management areas. For dense urban areas well served by multiple modes, alternative standards should not require expression through vehicular level of service or volume to capacity ratios.	City of Portland	5/6/10	No change recommended. This is already allowed in this section of the RTFP.
153	RTFP Title 2: Development and Update of TSPs	Section 3.08.230 (C) Performance Targets and Standards- Mobility standards different from those in Table 3.08-2: Give local jurisdictions more regional backing/support to explore alternative mobility standards that more effectively implement 2035 RTP objectives, particularly on "local" streets off of the state system.	City of Portland	5/6/10	No change recommended. This is already allowed in this section of the RTFP.
154	RTFP Title 3: Transportation Project Development	Section 3.08.310(A) Defining Projects in TSPs- Change..." locations and facility parameters, such as min and max ROW dimensions and the number and <u>size width</u> of traffic lanes..."	City of Portland	5/6/10	Amend as requested.
155	RTFP Title 4 Regional Parking Management	Section 3.08.410 (Parking Management) Address pedestrian circulation within large parking facilities. There should be design standards in the local jurisdiction's design review regulations that insure that there are safe routes for pedestrians through large parking facilities in addition to those related to major driveways.	Fred Nussbaum	5/4/10	Amend as follows: "Cities and counties shall require that parking lots more than three acres in size provide street-like features <i>along major driveways</i> , including curbs, sidewalks and street trees or planting strips."
156	RTFP Title 4 Regional Parking Management	Table 3.08-3 and Section 3.08.410(A) •No minimum parking ratios needed. Also, closely tying Zone A to transit service puts long range planning at the mercy of TriMet's operating budget and control. Identify areas and stick to them for long term.	City of Portland	5/6/10	Amend Section 3.08.410(A) as follows: "Cities and county parking regulations shall <b>establish parking ratios...</b> " This change provides flexibility for local governments to not have to adopt parking minimums. Parking maximums are still required. No change is recommended for the Zone A and Zone B provisions pending a more detailed assessment of the parking management strategies. This assessment will occur prior to the next RTP update. See comments # 31 and 36.
157	RTFP Title 4 Regional Parking Management	Section 3.08.410(H) Language is nice but we still need to specify a minimum number, say 5 percent of vehicles or more.	City of Portland	5/6/10	No change recommended.
158	RTFP Title 4 Regional Parking Management	Section 3.08.410 (Parking Management) Item A.2, Replace "light rail" with "HCT", for multiple references to on-half mile walking distance to a station, since BRT has a similar function.	Fred Nussbaum	5/4/10	Amend as requested.
159	RTFP Title 4 Regional Parking Management	Section 3.08.410 (Parking Management) Specify a standardized procedure for exempting parking facilities from the maximum parking standards and some kind of regional guidelines should be applied. Otherwise, this is a big loophole.	Fred Nussbaum	5/4/10	No change recommended. The language allows local governments flexibility to define an exemption process.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
160	RTFP Title 4 Parking Maximums Map	The Parking Maximums map does not seem to be correct in places. Why are there no swaths, for instance, along inner SE Division, inner NE Sandy Blvd. and SE Foster? Also, the swaths seem a lot narrower than ¼ mile on either side of many bus routes and narrower than ½ mile along sections of light rail. This would seem to conflict with the language under 3.08.410.	Fred Nussbaum	5/4/10	Amend as requested in consultation with TriMet. In addition, amend map to show existing service and HCT expansions that have been built since the last map update, including I-205 LRT.
161	RTFP Title 5: Amendment of Comprehensive Plans	This Title should be part Title 2, because it only describes a small class of plan amendments.	City of Portland	5/6/10	No change recommended.
162	RTFP Title 5: Amendment of Comprehensive Plans	Section 3.08.510(B) Transportation System Plans- <ul style="list-style-type: none"> <li>• Alternative trip generation assumptions are insufficient for dense urban areas like the Central City or Gateway Regional Center</li> <li>• Clarify how the 30% reduction will be applied to planning level analysis (transportation demand modeling) and to development review applications.</li> <li>• The City strongly supports the proposal to extend the 30% reduction option to designated "corridors" as well as centers and station communities.</li> </ul>	City of Portland	5/6/10	No change recommended. A local government may request more than a 30% trip reduction credit. The trip reduction credit only applies to plan amendments and zone changes that are not part of the TSP update; the transportation demand modeling used for TSP analysis already accounts for the impact of mixed-use, connectivity, parking pricing and access to transit in the mode choice and trip distribution.
163	RTFP Title 5: Amendment of Comprehensive Plans	Section 3.08.510 Section C and D- "The strategies set forth in subsection 3.08.220A". This should exclude the 3.08.220 A.6 motor vehicle capacity improvements.	City of Portland	5/6/10	Amend as requested to reference 3.08.220(A) 1 through 5. This is indicated in provision as amended in comment #21.
164	RTFP Title 5: Amendment of Comprehensive Plans	Section 3.08.510 (Amendments of City and County Comprehensive and Transportation System Plans) Item D, Amend language as follows: "If a city or county proposes a transportation project that is not included in the RTP and will result in a significant increase in SOV capacity or exceeds the planned function or capacity of a facility designated in the RTP, it shall demonstrate <i>consideration of consistency with</i> the following as part of its project analysis..."	Fred Nussbaum	5/4/10	Amend as requested.
165	RTFP Title 6: Compliance Procedures	3.08.610D This section should recognize that much of the TSP conformation work will be done through Periodic Review Tasks rather than Post Acknowledgement Plan Amendments	City of Portland	5/6/10	Amend as follows, "An amendment to a city of county TSP shall be deemed to comply with the RTFP <i>if no appeal to the Land Use Board of Appeals is made within the 21-day period set forth in ORS 197.830(9), or if an appeal is made and the amendment is affirmed by upon expiration of the appropriate appeal period specified in ORS 197.830 or 197.650 or, if an appeal is made, upon</i> the final decision on appeal."
166	RTFP Title 7: Definitions	Replace the outdated term "alternative modes" in the document and definitions section with "non-automobile" or "sustainable" modes	City of Portland	5/6/10	Amend to delete this definition. The term "alternative modes" is not used in the RTFP.
167	RTFP Title 7: Definitions	Define "Principal arterial": "throughways" identified in the 2040 design concept	City of Portland	5/6/10	Amend as requested to add a definition of principal arterials.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
168	RTFP Title 7 Definitions	Section 3.08.710 (Definitions) Item HHH "Traffic Calming", Amend as follows: "means street design or operational features intended to maintain a <del>given</del> low motor vehicle travel speed <b>to enhance safety for pedestrians, other non-motorized modes and adjacent land uses.</b> "	Fred Nussbaum	5/4/10	Amend as requested.
169	RTFP Title 7 Definitions	Section 3.08.710 (Definitions) Item M, "Deficiency" That a Throughway has less than 6 lanes or an Arterial less than 4 shouldn't automatically make them a "deficiency." The deficiency would occur if demand on those facilities exceed capacity. Also, if we are really trying to move transportation planning in this region away from thinking only in terms of highway capacity expansion, other types of deficiencies ought to be listed first as examples.	Fred Nussbaum	5/4/10	Amend definition to simplify. See comment #170.
170	RTFP Title 7: Definitions	M. Deficiency -First sentence, relating to standards/targets: There seems to be one too many negatives, or punctuation needs improvement, or ...? Couldn't a capacity or design constraint be OK if the limits it imposes still allow acceptable LOS? Not quite sure why a constraint that "prohibits" travel is not a deficiency. (Is a missing bridge or bike lane segment not a deficiency because it prohibits the ability to travel?) Is a "Gap" as described in Q a Deficiency? How about something generic like "... a constraint that restricts system performance to less than acceptable levels" .....and maybe provide a short list of examples that are undeniably deficiencies.	Washington County	5/6/10	Amend definition to replace with the following definition, <b>"Deficiency means a performance, design or operational constraint that limits travel by a given mode. Examples of deficiencies may include unsafe designs, bicycle and pedestrian connections that contain obstacles (e.g., missing ADA-compliant curb ramps, distances greater than 330 feet between pedestrian crossings), transit overcrowding or inadequate frequency, and throughways will less than six through lanes or arterials with less than 4 lanes that do not meet the standards in Table 3.08-2."</b> See comment #169.
171	RTFP Title 7: Definitions	Clarify which Streetcar stations are designated "major" transit stops	City of Portland	5/6/10	Amend as requested to update Regional Transit Network Map (Figure 2.12) in Chapter 2 to revise "major transit stops" designations to be consistent with the definition in the RTFP and RTP. See comment #46.
172	RTFP Title 7: Definitions	Define "Amendment" of the TSP as opposed to "Update" of the TSP	City of Portland	5/6/10	No change recommended. A definition of update has been added to make this distinction. See comment #42.
173	RTFP Title 7 Definitions	Section 3.08.710 (Definitions) Item O "Essential destination" This should include major cultural facilities (performing arts venues, museums, zoo, etc.), which are not "entertainment" per se. The list should include: employment areas, grocery stores, medical facilities, pharmacies, schools, post offices, social services agencies, shopping centers, colleges, universities, major parks, social centers (e.g., senior centers), sports and entertainment facilities, cultural facilities and major government offices.	Fred Nussbaum	5/4/10	Amend the definition to be more general, rather than more specific to provide flexibility to local governments to define which destinations constitute an "essential destination." See comment #174.
174	RTFP Title 7: Definitions	O. Essential Destinations- This definition needs to be more specific. The term as used in Pedestrian System Design section (3.08.130 A.2.) and the Bicycle System Design sections (3.08.140 A.2) will be a source of confusion and debate unless more specifically defined. It would be better to generalize the definition and leave the specifics of determining which land uses at what levels of activity constitute an "essential destination" to local governments.	Washington County	5/6/10	Amend to read as follows, "Essential destinations <b>includes such places as</b> hospitals, medical centers, grocery stores, parks, schools, and social service centers with more than 200 monthly LIFT pick-ups." The original list was not intended to be exhaustive and this amendment provides flexibility to local governments to define which destinations constitute an "essential destination." See comment #173.



## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
175	RTP Chapter 1- Changing Times	Page 1-44, under the "A Comprehensive Strategy to address growing congestion" section add a bullet to the Other strategies and actions the region is pursuing to read, <b><u>"Requiring adoption of local parking management plans and developing tools at the regional level to assist with their development."</u></b>	TriMet	5/5/10	Amend as follows, " <b><u>Adoption of local parking management plans in centers and station communities and developing tools at the regional level to assist with their development."</u></b> "
176	RTP Chapter 1- Changing Times	Page 1-31 Under the Transit Demand Outpacing Funding Section, please change the second paragraph sentence to read, "the purchasing power of operating funds for the regional transit system are also declining, as they are affected by inflation and by the cost of expanding <b><u>paratransit</u></b> services to serve the fast-growing elderly population and people with disabilities."	TriMet	5/5/10	Amend as requested.
177	RTP Chapter 1- Changing Times	Page 1-33 ,please change the sentence to read, "The RTP includes active living, human health and improved air quality as goals of the plan. <del>and expects</del> <b><u>However</u></b> , more work is needed to expand the region's analytical capability. <del>to allows for transportation investments to be evaluated for both their land-use and</del> <b><u>Additional resources will be required to analyze transportation investments in terms of their public health and environmental</u></b> benefits."	TriMet	5/5/10	Amend as requested.
178	RTP Chapter 1- Changing Times	On page 1-57 under the transit section Change the second sentence to read "Ridership on bus and light-rail lines in the region increased <b><u>by 45 percent between 1997 and 2007, nearly twice the percentage growth rate in population, which grew by 20 percent.</u></b> "	TriMet	5/5/10	Amend as requested.
179	RTP Chapter 1- Changing Times	On Page 1-56 the second paragraph in Transit section needs updating. Change to: " <b><u>Fifty-two</u></b> miles of MAX light rail lines operated by TriMet currently run through Portland, connecting the Portland Expo center with downtown Portland, the Portland International Airport with downtown Beaverton, and downtown Gresham with downtown Hillsboro. <b><u>The MAX Green Line</u></b> from Clackamas Town Center to Portland State University in downtown Portland opened in September 2009. <b><u>Engineering and Design</u></b> is underway <b><u>for a light rail line</u></b> from downtown Portland to downtown Milwaukie <b><u>with construction expected to start in 2011, Engineering and Design is underway for a light rail line from downtown Portland to Vancouver, Washington. Planning is underway for additional high capacity connections from downtown Portland to downtown Lake Oswego and from downtown Portland to the Southwest.</u></b> "	TriMet	5/5/10	Amend as requested.
180	RTP Chapter 1- Changing Times	Page 1-57 Change the last paragraph on page to: "Streetcar lines currently serve only the west side <b><u>but a line is under construction in the Lloyd district and eastside (MLK Jr Blvd-Grand Blvd).</u></b> <b><u>Planning is underway for Portland to Lake Oswego.</u></b> "	TriMet	5/5/10	Amend as requested.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
181	RTP Chapter 1- Changing Times	Page 1-35 Change Figures 1.8 – 2005 crashes in the region's counties and the City of Portland and 1.9 – 2005 crash location by road type to show the breakout of crashes by mode (bike, ped, vehicular only), so readers can understand where these particular types of crashes are occurring in relation to these other factors.	TriMet	5/5/10	No change recommended. Staff is still working with ODOT and the Regional Safety Work Group on better data analysis methodologies, including disaggregating ODOT to local government boundaries. This work will be provided to local governments for their Transportation System Plans when it is available, and will be included in the next RTP.
182	RTP Chapter 1- Changing Times	Page 1-50 Table 2.7 (Should be Table 1.7) -- Share of Residents Commuting to Another County for Work: 1990 and 2000 – The lead-in sentence to this table over generalizes a regional improvement in jobs housing balance from the data. The Clackamas County and Clark County numbers seem to be fairly stable. It's the Multnomah County and Washington County numbers that show the more significant changes, and Multnomah County is moving in the other direction. A sentence or two of further explanation to accurately describe what the data "suggests" should be included.	Washington County	5/6/10	Amend as requested
183	RTP Chapter 1- Changing Times	Figure 1.6 – Oregon Ranks Last Compared to Other Western States in Auto Taxes and Fees Collected – Does this chart reflect the gas tax, vehicle registration fee and title fee increases recently enacted or to be enacted under HB2001?	Washington County	5/6/10	Amend to clarify what is included in this data.
184	RTP Chapter 1- Changing Times	Figure 1.15 Vehicle Miles Traveled per Person 1990-2007 – Explain why VMT per person in Portland and Portland/Vancouver diverge so dramatically from U.S. Average beginning in 1996. The accompanying text implies that it's due to compact growth and providing transportation options, however we would expect to see a more gradual decline in Portland area VMT if this was the true reason. Were there one or two major events (e.g. opening of Blue Line) that would be a more accurate reason for this sudden divergence? The RTP should avoid conjecture.	Washington County, John Charles	5/6/10	Amend to more fully describe all of the factors that have influenced the decline in VMT per person in the region, including expanded transit service, rising gas prices.
185	RTP Chapter 1- Changing Times	Figure 1.18 – Regional Trail and Greenways – What's the Community Bikeway extending from North Plains west along Hwy. 26? Given its rural location, this route would seem to be more "regional" than "community" in nature.	Washington County	5/6/10	This is a technical correction. Amend Figure 1.18 legend to change "Community bikeway" to "Interregional trail."
186	RTP Chapter 1- Changing Times	Figure 1.10 Traffic Volume Increases in Key Corridors: 1993 to 2002 – It's not clear which corridors the graduated circles represent, and circles for some important corridors such as Hwy. 217, Hwy. 26 and TV Hwy. appear to have been omitted.	Washington County	5/6/10	No change recommended. This map displays the increase in traffic volumes on facilities located outside of our region. The traffic count locations were picked show growth in travel on facilities located outside of, or on the edge of the UGB.
187	RTP Chapter 1- Changing Times	Page 1-4 Yellow highlight on map is not explained, label highlight or delete.	TriMet	5/5/10	No change recommended. The title of the map is "Portland-Vancouver Metropolitan Region Geographic Context."
188	RTP Chapter 1- Changing Times	Population % for Washington County states 423%. Should read 43%.	Clackamas County	5/5/10	Amend as requested.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
189	RTP Chapter 1- Changing Times	Page 1-50 – Residents are Commuting Longer, but Less than the National Average – Text states that average commute times in Portland region grew by only (our emphasis) six minutes between 1990 and 2000, while national average grew from 22 to 26 minutes (i.e., a 4 minute increase?). It seems like our commute distances are growing faster than the national average. Please clarify the apparent contradiction.	Washington County	5/6/10	Amend as requested
190	RTP Chapter 1- Changing Times	The region must develop a priority plan to address risks to the transportation system associated with a seismic event and upgrade critical infrastructure to meet seismic standards before have a catastrophic earthquake.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. This work is already occurring through the Regional Emergency Management Group (REMG) as described in Chapter 1 (pages 38 and 39) of the RTP.
191	RTP Chapter 1- Changing Times	Clackamas County has multiple rural transit providers of which cities neighboring the Metro boundary offer services that connect to TriMet and SMART. However, these providers are not represented on the Regional Transit Network Map (Figure 2.15). Please include either a transit district map that shows all the transit districts or make edits to the RTP Transit Network Map.	Clackamas County	5/5/10	Amend as requested to include a transit district map in Section 1.8 of Chapter 1.
192	RTP Chapter 2 - Vision	The BTA has serious concern with the focus on "congestion" as a negative performance target in section 2.3.1. More proactive measures such as "travel time" or "travel reliability" would more effectively meet regional transportation goals.	Bicycle Transportation Alliance	5/6/10	No change recommended. The performance targets are interim and will be refined as new tools and data sources are developed to monitor regional mobility. As part of HB 2001 Climate Change Scenarios, the region will be testing new tools and measures that will help to inform refinements to the current targets. Recommendations from that work will be forward to the next RTP update.
193	RTP Chapter 2 - Vision	Auto mobility standards are poor measurement indices for transportation system performances. BTA recommends that Metro completely cease using roadway mobility standards.	Bicycle Transportation Alliance	5/6/10	No change recommended. The region has agreed to retain the interim mobility policy in the RTP and adopt a broader set of performance targets for measuring transportation performance. Future work will focus on improving tools and methods evaluating and tracking performance over time, and may result changes to the mobility policy. Any refinements would be brought forward for consideration by MPAC and JPACT prior to consideration by the Metro Council.
194	RTP Chapter 2 - Vision	Page 2-2 – If the six outcomes listed in the inset box are the outcomes we are trying to accomplish, then they are important enough to warrant specific citations to their adopting resolutions.	Washington County	5/6/10	Amend as requested to add reference to Resolution No. 08-3940, expressing the intent of Metro and its regional partners to use a performance-based approach to guide policy and investment decisions in the region. The resolution (1) affirmed a definition of a successful region, which have since become known as the "six desired outcomes." and (2) directed staff to work with regional partners to identify the performance indicators, targets, actions and decision-making process necessary to create successful communities.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
195	RTP Chapter 2 - Vision	Page 2-15. The RTP states that the targets are taken from state and federal legislation, and leaves the door open for development of a broader range of regional targets at some later time. Text should be added to the RTP identifying these targets are a starting point subject to review and evaluation as local TSPs are developed, and that they will be modified and refined as a result of this work and folded into the next RTP update as appropriate.	Washington County	5/6/10	Amend as requested, and to also acknowledge the targets may be refined as tools and methodologies are improved and based on the House Bill 2001 Climate Change Scenarios work and Regional Indicators work that is underway. Any refinements would be brought forward for consideration by MPAC and JPACT prior to consideration by the Metro Council.
196	RTP Chapter 2 - Vision	Page 2-16 – The interim mobility policy doesn't really state why it is an interim strategy and what it is interim to. This section would benefit from a more complete explanation of this interim strategy.	Washington County	5/6/10	Amend as requested.
197	RTP Chapter 2 - Vision	Page 2-13 Regional Transportation Performance Targets- A good target is one that is demonstrated to be potentially achievable through the application of strategies and actions identified in the plan. If this can't be demonstrated, it should be recognized that targets are somewhat "informal" or interim in nature. Unrealistic targets ultimately may be counterproductive if they create unrealistic expectations of the plan. What good is a target of 10 percent per capita VHD reduction, for example, if we don't know how or whether we can under any circumstances adjust the system to achieve it over time? <u>Targets for freight climate change</u>	Washington County	5/6/10	Amend section 2.3.1 Performance Targets to acknowledge the RTP targets are aspirational and are intended to serve as a starting point for moving the region toward outcomes-based decision-making. The performance targets will be refined as part of the next RTP update to respond to the House Bill 2001 Climate Change Scenarios work, TSP updates, Regional Indicators work and development of improved tools and methods for evaluating performance. Any refinements would be brought forward for consideration by MPAC and JPACT prior to consideration by the Metro Council.
198	RTP Chapter 2 - Vision	Need a consolidated, clear description of the characteristics of roadways of different functional classifications and design types listed in the RTP. The description – possibly a table or a few short paragraphs – should identify the range of design characteristics, lane numbers and functional characteristics for each classification. Descriptions should take into consideration and address how local government functional classification systems are structured	Washington County	5/6/10	Amend glossary to add definitions for the regional street design classifications. The glossary already includes the different roadway functional classifications. Table 2.6 already provides a summary of the roadway function, design and number of typical lanes. Local government classifications should be consistent with the classifications used in the RTP, and Metro has encouraged local governments to retain minor and major arterial classifications as part of past reviews of local TSP updates.
199	RTP Chapter 2 - Vision	<b>Priority Investment Strategies</b> - What is meant by the strategy "Providing a multi-modal urban transportation system"? The focus of activity for the rest of the strategies in this table is clear, but this one seems to be more an objective than a strategy. Is it adding sidewalks and bike lanes? Is it bringing a planned multi-modal facility up to standard? Other strategies do these things as well. Please clarify.	Washington County	5/6/10	No change recommended. The strategy includes all of those actions.
200	RTP Chapter 2 - Vision	Page 2-40 -- 2.5.3 Regional Transit Network Vision – The transit section says very little about the importance of transit park and ride lots, and they don't seem to be shown on any map. They are a critical component of the transit system, and warrant more discussion in the RTP.	Washington County	5/6/10	No change recommended. Regional transit policy prioritizes walking, biking and bus to access transit and promotes high-density mixed-use development in the immediate vicinity of transit stations, to help minimize the need for expensive park and ride facilities.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
201	RTP Chapter 2 - Vision	Page 2-22 -- #5 regarding bike/pedestrian and regional trails functions is unclear. How are "regional trails with a transportation function" distinguished from other regional trails?	Washington County	5/6/10	No change recommended. In Spring 2007 Metro transportation and trails staff screened trails from the Regional Trails/Greenspaces map for transportation function. Screening criteria included included serving a 2040 target area, and a combination of the following destinations: school or library, residential area, park and ride, transit center or light rail station, regional park, a regional trail or multiple local parks. significant habitat areas. The resulting list of regional trails with a transportation function were provided to the Regional Trails Working Group to prioritize trails for inclusion in the RTP. Metro staff forwarded the results to the County Coordinating Committees for their consideration when developing RTP project submittals.
202	RTP Chapter 2 - Vision	Page 2-22 -- The "Regional System Definition" remains vague. It is difficult to see what would not be defined as part of the regional system. It would be helpful to local governments to clearly understand the difference between facilities or services that are Regional -- in the sense that Metro or the State has or seeks a primary regulatory role and/or funding responsibility for them -- and those things that are simply of regional interest and for which local governments should have the primary regulatory and/or funding responsibility. Maybe providing a list of parts of the system that are clearly local would help. -The distinction between regional and local facilities should be reflected in the RTP system maps. In most cases some facilities on our plan maps aren't on the RTP maps. These might be interpreted as being local facilities, but for the fact that other similar types of facilities are included on the RTP maps. (Further review during our TSP updates is probably the best way to address this mapping issue at this point.)	Washington County	5/6/10	No change recommended. The RTP system maps clearly designate which facilities are part of the regional system. Local TSP updates are the appropriate place to determine what constitutes a local facility and may identify amendments to the RTP system maps that may be forwarded to the next RTP update.
203	RTP Chapter 2 - Vision	Figures 2.10, 2.12, 2.15, 2.22 and 2.25 contain significant gaps in the grid in SW Portland. We recommend that additional north/south and east/west streets be added to create a grid-like system of "complete streets."	Southwest Neighborhoods Inc.	5/6/10	No change recommended. This comment has been forwarded to the City of Portland for consideration as part of their TSP update.

ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
204	RTP Chapter 2 - Vision	Revise the text box for the southern arterial shown on Figure 2.10, Figure 2.12 and Figure 2.20 to read as follows,"The I-5/99W Corridor Refinement Plan has made a recommendation (Alternative 7 with conditions) for new arterials in this area. <i>Refinements will be made to this map during the public comment period to reflect these recommendations.</i> <b>The conditions include: integration with land use plans for UGB expansion areas and Urban Reserves, conducting the I-5 South Corridor Refinement Plan, including Mobility Corridors 2, 3 and 20, and resolution of access between I-5 and southern arterial with no negative impacts to I-5 and I-205 beyond the forecast No-Build condition, addressing NEPA to determine the preferred alignment and addressing any conditions associated with land use goal exception for southern arterial."</b>	Metro staff	5/3/10	This is a technical correction. Under OAR 660-012-0070, the project illustrated on the RTP maps is not part of the "planned" RTP system until a goal exception has been adopted through a local comprehensive plan. The responsible agency for adopting a goal exception is the county (or counties) with planning responsibility for the area where the proposed facility would be located.
205	RTP Chapter 2 - Vision	The plan contains two different contradictory targets for a combined housing/transportation affordability index with no baseline, interim, or sub regional goals. Amend Affordability performance target (p.2-15) as follows: " <del>Affordability—By 2035, reduce the average household combined cost of housing and transportation by 25 percent compared to 2000.</del> <b>For the region, sub regions, and Metro cities achieve measurable periodic reductions in the percentage of renter households paying more than 45% of income for housing/transportation, when compared to a 2000 baseline (and using a national housing transportation/housing index), with 5% reductions every 5 years. (2015, 2020, 2025, 2030, 2035).</b> " . Amend Objective 8.4 Transportation and housing Costs (p.2-11) as follows: <del>Reduce the share of households in the region spending more than 50 percent of household income on housing and transportation combined.</del> " <b>For the region, sub regions, and Metro cities achieve measurable periodic reductions in the percentage of renter households paying more than 45% of income for housing/transportation, when compared to a 2000 baseline (and using a national housing transportation/housing index), with 5% reductions every 5 years. (2015, 2020, 2025, 2030, 2035).</b> "	Tom Cusack, Oregon Housing Blog and Cathy Briggs, Oregon Opportunity Network	5/1/10	Amend Table 2.3 Regional Performance Targets to include baseline data for affordability: " <del>Data under development</del> <b>In 2005, the average household in the Portland region spent about 44 percent of its income on housing and transportation.</b>

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
206	RTP Chapter 2 - Vision	The plan continues to use a "one off" method of calculating housing/transportation affordability that does not match a nationally standardized methodology (Center for Neighborhood studies) for which data is available (to block group levels) for 337 Metro areas, including Portland. See H&T index at <a href="http://www.civicfootprint.org/">http://www.civicfootprint.org/</a> . Obtain, use and publish H & T index data down to the census tract, TAZ, sub regional and city levels, modifying only if changes are transparent and necessary to match the regional adopted definition of affordability (which focuses on renter affordability).	Tom Cusack, Oregon Housing Blog and Cathy Briggs, Oregon Opportunity Network	5/1/10	No change recommended. Metro's methodology is more inclusive than the Center for Neighborhood Studies' methodology when defining housing costs; additionally, Metro's methodology factors in more localized conditions. See comment #207.
207	RTP Chapter 2 - Vision	No rationale has been provided for the use of a standard that 50% of income for housing and transportation is "affordable." Such a standard would exceed the 45% of income housing/transportation affordability threshold used in the nationwide H & T index. ( <a href="http://www.civicfootprint.org/">http://www.civicfootprint.org/</a> ). Use 45% of income as the standard for affordability, not 50% of income.	Tom Cusack, Oregon Housing Blog and Cathy Briggs, Oregon Opportunity Network	5/1/10	No change recommended. There is no uniform standard to follow; combining housing and transportation costs is new territory. The Center for Neighborhood Studies' use of 45% is just as new as Metro's use of 50%. Neither is necessarily "right." The RTP is transparent about the definition and which costs are included (all transportation and housing costs tracked by the U.S. Bureau of Labor Statistics in the Consumer Expenditure Survey). Metro chose 50% of income because the 2007 national median share of household income spent on housing and transportation was 45%, and it seemed to be more meaningful to choose a threshold that was higher than the median.
208	RTP Chapter 2 - Vision	On page 2-4 under the Integrated Land Use and Transportation Vision, change the second paragraph, to read "It concentrates mixed-use and higher-density development in 38 "centers"; 33 "station communities", and <u>x</u> miles of "main streets" <b>that are located within many of the corridors that connect the centers.</b> "	TriMet	5/5/10	Amend as follows, ""It concentrates mixed-use and higher-density development in <del>38</del> "centers"; <del>33</del> "station communities", and "main streets" <b>that are located within many of the corridors that connect the centers.</b> " It is not necessary to enumerate the number or miles of 2040 design types in the 2040 Growth Concept map.
209	RTP Chapter 2 - Vision	Page 2-47 first sentence about park and rides seems out of place. Move sentence to end of paragraph and add language so that it reads: "In select suburban locations, park-and-ride facilities provide vehicular access to the high capacity transit network, <b>especially for areas that cannot be well-served by local transit due to topography, street configuration, or lack of density</b> ".	TriMet	5/5/10	Amend as follows, " <b>especially for areas that cannot be well-served by local transit due to topography, street configuration, or lack of sufficient mixed use and transit-supportive densities.</b> "
210	RTP Chapter 2 - Vision	On page 2-4 under the Integrated Land Use and Transportation Vision, change the second sentence to read "the Growth Concept then plans high-capacity transit to connect the Portland central city and seven regional centers."	TriMet	5/5/10	Amend as requested

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
211	RTP Chapter 2 - Vision	Page 2-47 Add to list: - Bus Rapid Transit (limited stop, all day bus service with significant portions of the line running in transit-only right-of-way) - On-Street Bus Rapid Transit (limited stop, all day bus service mostly operating in mixed traffic with focused transit priority treatments such as queue jump lanes). Due to its flexibility, On-Street Bus Rapid Transit can have attributes that are more like High Capacity Transit or like Frequent Service Bus and may be considered as a mode in either depending on circumstances.	TriMet	5/5/10	Amend as requested
212	RTP Chapter 2 - Vision	Page 2-18, Figures 2.2 through 2.6, this concept needs to be consistent with the policies laid forth in the RTFP. If suggested changes to the RTFP are made, regarding a 30 percent trip reduction for all areas that meet certain land use, design, and policy criteria, then the areas of special concern should be deleted from the RTP.	TriMet	5/5/10	Amend as requested to remove areas of special concern designation and to update Table 2.4 to be consistent with Table 3.08-2 of the RTFP. See comments #39, 41 and 83.
213	RTP Chapter 2 - Vision	On page 2-6 table 2.2 Priority Infrastructure Investment Strategies add " <b>providing a multi-modal urban transportation system</b> " as a strategy for developed areas.	TriMet	5/5/10	Amend as requested.
214	RTP Chapter 2 - Vision	On page 2-7 this page reads like there are two separate visions for the region's transportation system. Consider starting the section with the public's desired outcomes for the RTP and then leading into the overarching vision for the RTP by stating, "The overarching vision for the RTP, which reflects the public's desired outcomes, is to ensure that:"	TriMet	5/5/10	Amend as requested.
215	RTP Chapter 2 - Vision	Page 2-table 2.4 Interim Regional Mobility Policy. This table needs to be consistent with Table 3.08-2 in the RTFP. If suggested changes to Table 3.08-2 in the RTFP are made, then please change Table 2.7 in the RTP.	TriMet	5/5/10	Amend as requested.
216	RTP Chapter 2 - Vision	Page 2-40 The five policies listed in the blue breakout box need the word "transit," after expand frequent service and improve local service. Change the two bullets in the breakout box to read: • Expand frequent service transit • Improve local service transit	TriMet	5/5/10	Amend as requested.
217	RTP Chapter 2 - Vision	Page 2-41 change the second sentence in the first paragraph to read, The policies aim to <b>provide transit as an attractive and accessible travel option for all people in the Metro region</b> , optimize existing <b>transit system operations, and</b> ensure transit-supportive land uses are implemented to leverage current and future transit investments."	TriMet	5/5/10	Amend as requested.



## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
218	RTP Chapter 2 - Vision	Page 2-43 change first sentence to: "Building the total transit system <b>is based on</b> providing frequent, reliable <b>bus and rail</b> service during all times of the day, every day of the week. <b>However, it goes far beyond this, requiring actions on behalf of the region and all jurisdictions, not just the transit agency.</b> "	TriMet	5/5/10	Amend as requested.
219	RTP Chapter 2 - Vision	Page 2-43 please delete final three paragraphs. At the end of the second paragraph add a sentence that reads, "Table 2.16 depicts the Metro region's priorities for providing multi-modal access to the region's transit service. It prioritizes walking and biking to transit and deemphasizes driving to transit."	TriMet	5/5/10	Amend as requested.
220	RTP Chapter 2 - Vision	Page 2-48 HCT Plan description needs clarity on how HCT modes were handled. Add to end of second paragraph: <b>"The HCT System Plan conducted much of its analysis using light rail as the representative HCT mode, but the corridors could be developed in a number of modes including light rail, bus rapid transit (on-street or exclusive), commuter rail, and rapid streetcar.</b> The HCT plan report and technical evaluation results <b>are included</b> in the Appendix."	TriMet	5/5/10	Amend as requested.
221	RTP Chapter 2 - Vision	Page 2-51 under the first paragraph add a sentence to the end of the first paragraph that reads, <b>"HCT corridors will be analyzed for a wide range of performance characteristics, including ridership and potential to compete for funding, before they are designated as the current priority for HCT development."</b>	TriMet	5/5/10	Amend as requested.
222	RTP Chapter 2 - Vision	Page 2-52 in the first sentence in the third paragraph see recommendation. Frequent bus service is appropriate when high ridership demand is demonstrated or projected, the streets are pedestrian-friendly, there are high proportions of transit-dependent residents, the lines connect to existing or proposed HCT corridors, and/or it serves multiple centers and major employers.	TriMet	5/5/10	Amend as requested.
223	RTP Chapter 2 - Vision	Page 2-52 change last sentence about park and ride needs to "In select suburban locations, park-and-ride facilities provide vehicular access to the <b>frequent service</b> network, <b>especially for areas that cannot be well-served by local transit due to topography, street configuration, or lack of density</b> ".	TriMet	5/5/10	Amend as requested.
224	RTP Chapter 2 - Vision	Page 2-52 table 2.8 needs additional detail on BRT. Add table note <b>"Bus rapid transit as shown in this table can include fully exclusive Bus Rapid Transit, as treated in the HCT Plan, and in fully or mostly dedicated right-of-way, as well as On-Street Bus Rapid Transit, which is mostly in mixed traffic."</b>	TriMet	5/5/10	Amend as requested.
225	RTP Chapter 2 - Vision	Page 2-75 first paragraph under improve pedestrian access to transit change second sentence to read "They are located along good-quality transit lines and will be redeveloped at densities that are somewhat <b>higher</b> than today."	TriMet	5/5/10	Amend as requested.

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#	Category	Comment	Source(s)	Date	Recommended Action
226	RTP Chapter 2 - Vision	Page 2-76 in the first paragraph, the last sentence has a typo. Amend text to read ( <b>except</b> expressways)	TriMet	5/5/10	Amend as requested.
227	RTP Chapter 2 - Vision	Page 2-82 second paragraph refers to iphones change sentence to read "" For example, TriMet's TransitTracker data, which predicts next arrival times for vehicles, can now be accessed through a variety of different <b>mobile device applications.</b> "	TriMet	5/5/10	Amend as requested.
228	RTP Chapter 2 - Vision	Page 2-83 the last paragraph states that travel information and option incentives will result in improved travel times for other roadway users. This should not be the only benefit listed. Change to read, "By providing travel information and option incentives, like employer or youth passes, <b>this will provide incentives for people to adjust their travel behavior from driving to walking, bicycling, and taking transit. Benefits from this change in travel behavior include healthier people, reduced personal transportation costs, reduced air pollutants, and improved travel times and reliability</b> for other roadway users."	TriMet	5/5/10	Amend as requested.
229	RTP Chapter 2 - Vision	On page 2-13 table 2.3 Regional Transportation Performance Targets performance should be measured with actual data, not model outputs. Please provide actual, not just modeled forecast numbers, for all performance targets, under the performance column. If actual data is unavailable, say why and how this will be remedied. Add a new column that says forecasted performance. Move all the current information under the performance column into this new column. Under the findings column, note that the region has established a baseline to track progress toward achieving the target over time for all of the performance targets, and then, when available, provide info on how the regional forecasts compares to the targets.	TriMet	5/5/10	No change recommended. The RTP establishes a performance management system the includes aspirational targets, performance evaluation, and performance monitoring. The performance targets are measured using travel forecast data with the exception of the safety and cost-burden household targets. Most of the targets do not have a direct, observed data equivalent that can be matched one for one. A performance monitoring report will be develop that relies on available observed data that can serve as a proxy for assessing progress in achieving targets..
230	RTP Chapter 2 - Vision	RTP page 2-34 – Second paragraph contains an error: minor arterials are described as having characteristics that must have been intended to be for throughways (six lanes plus aux lanes).	Washington County	5/6/10	Amend as requested.
231	RTP Chapter 2 - Vision	RTP Map 2.12 – Distinguishes between major and minor arterials with no clear indication of lane numbers. This is fine as long as there's a definition somewhere that all arterials can be either two or four lanes.	Washington County	5/6/10	Amend as requested. See also comments #3, 54 and 116.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
232	RTP Chapter 2 - Vision	Figure 2.15 -- Regional Transit Network – RTP major bus stop locations are inconsistent with those of the 2009 Transit Improvement Plan. In the RTP there are major bus stops along Cedar Hills Boulevard but no regional bus service indicated. There are no or few major bus stops along TV Hwy. east of Brookwood, 99W and Scholls Ferry. It seems like there should be a relationship between major bus stops and regional bus service. Inclusion of a definition of elements of the transit stop hierarchy in the Definitions Section, including major bus stop, would be useful.	Washington County	5/6/10	Amend as requested. Metro staff will work with TriMet staff add a definition of "major bus stops" as well as edit the Regional Transit Network Map to reflect their locations, consistent with the definition. See comment #46 and comment #303.
233	RTP Chapter 2 - Vision	Figure 2.20 -- Regional Freight Network – Is there any reason why the general alignment of pipelines, an important element of freight transport, aren't shown on this map (e.g. security)?	Washington County	5/6/10	No change recommended. Pipeline data is not easily available. Some are privately owned, and there are security issues in mapping them.
234	RTP Chapter 2 - Vision	Figure 2.12 -- Arterial and Throughway Network – It's not clear which of the arterials on this map are also Throughways.	Washington County	5/6/10	No change recommended. The glossary defines throughways as consisting of principal arterials.
235	RTP Chapter 2 - Vision	Page 2-42 Regional Transit Map, make sure Division-Powell and I-205 are listed as On-Street BRT in the key, change in legend to: "On-Street Bus Rapid Transit." change On-Street Bus Rapid Transit color to something else more distinctive.	TriMet	5/5/10	Amend as requested. "On-street BRT" is listed as a type of transit service on page 2-53 of the RTP. The Regional Transit Network Map will be updated to show planned transit service along I-205 from Oregon City to I-5.
236	RTP Chapter 2 - Vision	<b>Resources to conduct data collection, analysis, and reporting.</b> TriMet strongly urges Metro to dedicate specific funding for this, in an ongoing manner, so that data can be consistently collected, analyzed, and reported, leading to more efficient and effective management of regional resources and better long-term performance toward regional targets.	TriMet	5/5/10	No change recommended. Metro will continue to develop its data collection and analysis capabilities in partnership with other regional and local agencies and institutions, pending sufficient budget and staff resources to conduct this work and consistent with the 2010 Metro Auditors report on Tracking Transportation Project Outcomes.
237	RTP Chapter 2 - Vision	<b>Actual results vs. forecasted results.</b> Trimet encourages Metro to revisit the regional transportation performance targets in Table 2.3 and include actual performance, in addition to forecasted performance, when possible	TriMet	5/5/10	No change recommended. Refer to #151 response.
238	RTP Chapter 3 - Investment Strategy	Page 3-17. Please add definitions for both "state RTP system" and "federal RTP system" in the text of section 3.5 and in the glossary.	TriMet	5/5/10	Amend as requested.
239	RTP Chapter 3 - Investment Strategy	Page 3-21, the final paragraph should also reference the frequency in service upgrades to WES in the State RTP assumptions. Change to read, "New high capacity transit connections to Milwaukie, from Portland to Lake Oswego, to Clark County and to Tigard are included in the state RTP system. In addition, span-of-service and service frequency upgrades to WES commuter rail, expanded <b>frequent</b> bus service, and other transit infrastructure investments are included."	TriMet	5/5/10	Amend as requested.
240	RTP Chapter 3 - Investment Strategy	Page 3-19 caption. Please delete the caption under the Type 4 light rail vehicle picture.	TriMet	5/5/10	Amend as requested and replace with the following text, <b>"HCT is a key mobility corridor investment in the RTP, and will help the region meet greenhouse gas emissions reduction goals."</b>

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241	RTP Chapter 3 - Investment Strategy	Page 3-2 – second line should read -- "... would be considered for funding if <b>assumed</b> new or expanded revenue sources are secured." The footnote should reference the fact that the region has assumed certain levels of future revenues and constrained the plan accordingly. It should also point out that there are unmet needs without projects or solutions beyond the State system, and that these could not be addressed unless revenues in excess of those assumed are secured.	Washington County	5/6/10	Amend as requested.
242	RTP Chapter 3 - Investment Strategy	This plan is very light on bus improvement and is very biased towards improvements, even though there is a pattern that once rail improvements are built-bus services have to be cut to pay for the rail. The bus system is failing today and could be fixed for the entire TriMet service district, for less than the cost of one light rail line.	Erick Halstead	5/6/10	No change recommended. TriMet guides bus system improvements through their annual Transit Investment Plan update.
243	RTP Chapter 3 - Investment Strategy	Page 3-27 – "State Highway Capital Costs" section gives cost and examples of projects that will be done in the financially constrained system. The cost of state system needs that are not addressed in the financially constrained system (or in the State RTP System) should be recognized in the RTP as well, as, ideally, should the cost of unmet non-state needs.	Washington County	5/6/10	Amend as requested. Information will be added to show the total amount of expected costs for the state RTP system in addition to the financially constrained capital costs for the State highway capital costs, regional street capital costs, and transit capital costs.
244	RTP Chapter 3 - Investment Strategy	RTP does not define "community building projects" or "mobility building projects." In order to meet performance targets in Table 2.3, Metro and jurisdictions must seriously invest in the infrastructure needed to allow people, goods and services to reach destinations without relying on motor vehicles.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. These definitions are included in the RTP Glossary and Section 2.5 in Chapter 2 of the RTP.
245	Chapter 4 - Mobility Corridor Strategies	Mode share should specify if it is commute or daily.	City of Portland	5/6/10	Amend as requested to clarify the mode shares reported are "average daily" for all trips.
246	Chapter 4 - Mobility Corridor Strategies	For Mobility Corridors 3, 13, 14 and 15, that reach into rural areas of Clackamas County, please reference the neighboring cities and information regarding linking to the neighboring cities transit service included in the Frequent Bus Service Gaps and Deficiencies section of the needs assessment for each mobility corridor.	Clackamas County	5/5/10	Amend as requested.
247	RTP Chapter 4 - Mobility Corridor Strategies	More clarity is need to distinguish the difference between projects and strategies. Are strategies more like project types? Our concern is that the TPR requires that the RTP identify the needs, modes, functions, and <i>general location</i> of improvements. Projects should be specific enough to include the general location. In the draft, none of the strategies include a general location.	ODOT	5/5/10	Amend as requested to include a map of the projects adopted in the RTP to show their respective the general location. In addition, language will be added to the Chapter 4 introduction as to the intent and usage of the mobility corridor strategies, and to define each element and section.
248	RTP Chapter 4 - Mobility Corridor Strategies	The Mobility Corridor Strategies chapter needs an introduction that explains the Mobility Corridor concept, how you came up with the needs and strategies, with some narrative about the workshops, the atlas, etc.	ODOT	5/5/10	Amend as requested to provide chapter introduction that describes concept and development of strategies.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
249	RTP Chapter 4 - Mobility Corridor Strategies	Based on review of the mobility corridor strategies for corridors, 3, 7, 8, 11 and 12 we have provided technical corrections for the needs and strategies.	Clackamas County	5/5/10	Amend as requested.
250	RTP Chapter 4 - Mobility Corridor Strategies	Add a field to the project lists, identifying the Mobility Corridor that they apply to. This would allow sorting the projects by Mobility Corridor, and would help meet the requirement of defining the general location of planned improvements	ODOT	5/5/10	Amend as requested.
251	RTP Chapter 4 - Mobility Corridor Strategies	Under Regional Actions, each of the MCs requiring a CRP should include a bullet to "continue work on identifying resources to complete the CRP".	ODOT	5/5/10	Amend as requested.
252	RTP Chapter 4 - Mobility Corridor Strategies	Based on review of the mobility corridor strategies for corridors, #7, #8, and #14, we have provided comments and recommended information for strategies to address needs.	Oregon City	5/5/10	Amend as requested.
253	RTP Chapter 4 - Mobility Corridor Strategies	Corridor descriptions should include location of the heavy rail lines as well as in the corridor function.	ODOT	5/5/10	Amend as requested.
254	RTP Chapter 4 - Mobility Corridor Strategies	Needs list-There are statements sprinkled into the needs lists that are existing conditions, not needs; those should be deleted.	ODOT	5/5/10	Amend as requested.
255	RTP Chapter 4 - Mobility Corridor Strategies	The "strategies" column should indicate that strategies are yet to be determined. It is critical that the list of Local Actions not just says "address local street connectivity issues as part of local TSPs" but "address all needs identified in the MCS in local TSPs (or the CRP), consistent with the Regional System Concepts and Policies (section 2.5). The Regional Transportation Functional Plan should include the same instruction with some more guidance, yet allowing flexibility in how to address the policies and concepts.	ODOT	5/5/10	Amend as requested. Language will be added to better articulate local actions to implement the transportation functional plan.
256	RTP Chapter 4 - Mobility Corridor Strategies	For each mobility corridor description, TriMet recommends additional editing to ensure consistency in how the high capacity transit and frequent bus service gaps and deficiencies are defined.	TriMet	5/5/10	Amend as requested. Metro staff will work with TriMet staff to develop consistent language for each mobility corridor strategy to guide TSP development in identifying HCT and frequent bus gaps.
257	RTP Chapter 4 - Mobility Corridor Strategies	It is not clear whether the graphs are a % of the number of projects, or a % of the dollars. It is also not clear what the definition of roads and highways is - is it based on ownership? vehicular functional class? and how is "freight" defined? How did you address projects that affect multiple corridors?	ODOT	5/5/10	Amend graph notes to clarify that the graphs represent the modal break down by number of projects. The table that follows the graph represents the total costs of projects by mode.
258	RTP Chapter 4 - Mobility Corridor Strategies	The introductory paragraphs are redundant. The facilities in the corridor are more clearly provided in the table of Regional Transportation Facilities. The 2040 land uses are part of the function and are listed in a table.	ODOT	5/5/10	Amend to delete introduction paragraphs for each mobility corridor. See comment #176, which calls for expanding the introduction of Chapter 4 of the RTP.
259	RTP Chapter 4 - Mobility Corridor Strategies	Under Local Actions: this list should be more complete and consistent with whatever goes into the transportation and urban growth management functional plans. It should be specific to each corridor,	ODOT	5/5/10	Amend to insert consistent language to reflect the need to implement the functional plan under local actions. This part of the mobility corridor strategies is a starting point to help guide local agency development of TSPs. In some cases, specific local actions may not have been identified, but will be as part of the local TSP.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
260	RTP Chapter 4 - Mobility Corridor Strategies	The "Summary of Needs" is often just a description of the parts of the corridor and not necessarily where there is a need or deficiency. Sometimes the needs are specific and sometimes general so it is difficult to figure out what level of detail to respond.	ODOT	5/5/10	Amend to provide consistent characterization of regional needs.
261	RTP Chapter 4 - Mobility Corridor Strategies	"Arterial Deficiencies" lists all the "local streets" that have heavy rail crossings but many of the local streets are arterials or collectors. In addition, why are all at grade heavy rail crossings identified as "Arterial Deficiencies"? Identifying all rail crossings as needs/deficiencies it implies that there are needs/deficiencies at all the at grade heavy rail crossings in the Metro area.	ODOT	5/5/10	Amend to remove at-grade rail crossings as a deficiency except where a need has been previously identified through the Regional Freight Plan or other planning effort.
262	RTP Chapter 4 - Mobility Corridor Strategies	Why does the "Regional Transportation Facilities" table only include Parallel Arterials and not perpendicular ones?	ODOT	5/5/10	No change recommended. As stated in previous comment responses, the mobility corridor strategies are a starting place. During the mobility corridor workshops in spring 2009, this issue was raised. As a post-RTP task, Metro will reassess the mobility corridors and may include "perpendicular" facilities, as part of the Regional Mobility program that local governments may use in TSP updates and other planning activities. This will include producing a 2.0 version of the Mobility Corridor Atlas. Additionally, local TSPs updates may continue to refine and update the mobility corridor strategies.
263	RTP Chapter 4 - Mobility Corridor Strategies	"TSMO" and "TDM" be one of the types of deficiencies in the corridors.	ODOT	5/5/10	No change recommended. TDM is a TSMO strategy under the Regional TSMO plan and RTP policies. Collectively, they are strategies to address regional needs (both in terms of gaps and deficiencies).
264	RTP Chapter 4 - Mobility Corridor Strategies	ODOT would like the MCS to paint a picture of the <i>planned</i> facilities in each of the corridors, and to provide direction for future planning (in CRPs and TSPs), for project development, and for future plan amendments.	ODOT	5/5/10	No change recommended. That is the intent of the Mobility Corridor Strategies. This RTP is a starting point, and will be subject to amendment/refinement to reflect updates to local TSPs and corridor refinement planning work that is underway.
265	RTP Chapter 4 - Mobility Corridor Strategies	Have definitions of Throughway vs Arterial. Many of the principal arterial highways are listed as throughways not arterials.	ODOT	5/5/10	No change recommended. The glossary defines throughways as consisting of principal arterials.
266	RTP Chapter 4 - Mobility Corridor Strategies	Investment strategies should match the needs. Strategies identified to address needs should include both "funded" and "unfunded" strategies. The "funded" strategies should be differentiated between financially constrained and "state" projects.	ODOT	5/5/10	No change recommended. The mobility corridor strategies currently identify where strategies have been identified to address corridor needs. The RTP project list provides additional information as to which specific projects fall into which corridor and identifying financially constrained and state RTP projects. The mobility corridor strategies are not intended to have a project identified for every need, but instead are meant to serve as a guide TSP development. In most cases, local implementation of the RTP will be the primary strategy for addressing needs and may result in new and/or different investment priorities to address identified needs in each mobility corridor.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
267	RTP Chapter 4 - Mobility Corridor Strategies	The performance measures should be facility and location specific, and should include the actual performance so as to be useful as a baseline for future plan amendments. A map may be the way to show the performance in terms of V/C.	ODOT	5/5/10	No change recommended. With regard to establishing a baseline for "no further degradation" in the RTP, creating a table using the demand-to-capacity generated by the regional travel forecast model would be a severe misuse of the data. While there is a high level of confidence in the model outputs at the regional scale, the demand-to-capacity ratios on individual links may be substantially different from what is actually occurring on the ground. As the comment suggests, a more appropriate approach would use the Regional Mobility Policy maps as a trigger for local agencies to do an intersection level analysis as part of their TSP update that would then set a baseline for no further degradation (or identify that there is no cause for concern). This approach is already establish practice for plan amendments. See Comments #89 and #90.
268	RTP Chapter 4 - Mobility Corridor Strategies	MC 4- 2035 Investment Strategy, p. 4-40. Move "downtown E/W MAX capacity improvements (Rose Quarter/Steel Bridge) from Long term to Medium Term. It is not clear what is meant by "bridge improvements".	City of Portland	5/6/10	Amend as requested and to clarify what is meant by bridge improvements.
269	RTP Chapter 4 - Mobility Corridor Strategies	MC 4 - Change the name of this Mobility Corridor to "Central City I-5/405 Loop" to more clearly define this corridor.	City of Portland	5/6/10	Amend as requested.
270	RTP Chapter 4 - Mobility Corridor Strategies	MC 4- Add on page 4-33 that, following the call for a Master Plan, the City and ODOT have been analyzing potential improvements to the I-405/I-5/Hwy26 area as well as in the I-84/I-5 area. The City and ODOT are set to start the Portland Central City NE Quadrant and ODOT I-5 Broadway/Weidler Interchange Plan in Spring of 2010.	City of Portland	5/6/10	Amend as requested.
271	RTP Chapter 4 - Mobility Corridor Strategies	MC4- Front Avenue/Naito is not considered a parallel arterial to I-5 and I-405 in terms of function, as in Regional Transportation Facilities table on p 4-33.	City of Portland	5/6/10	Amend as requested.
272	RTP Chapter 4 - Mobility Corridor Strategies	MC4- Regional actions and local actions sections need further explanation on how and when actions shall be completed	City of Portland	5/6/10	Amend as requested.
273	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-147 -- Throughway Network Gaps and Deficiencies – If it hasn't already been included in project #11303 (and it's not clear that it has been), one of the specific strategies that should be called out for 99W is "access management".	Washington County	5/6/10	Amend as requested.
274	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-147 and 148 -- Arterial Network Gaps and Deficiencies – Shouldn't signal retiming and interconnects be listed as the first strategies for addressing deficiencies on Hwy. 99W, Scholls Ferry and other highways and arterials?	Washington County	5/6/10	Amend as requested.
275	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-160 Corridor Function 2040 Access – Hwy. 26 connects the Central City to the Hillsboro Regional Center and the Tanasbourne Town Center.	Washington County	5/6/10	Amend as requested.
276	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-160 – Makes more sense that the western corridor boundary be extended to Hwy. 47 rather than stopping at Cornelius-Schefflin/Zion Church.	Washington County	5/6/10	Amend as requested.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
277	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-162 -- Throughway Network Gaps and Deficiencies – There is rather than “could be” a need for an additional over-crossing of Hwy. 26 at NW 174th. This need has been identified in the Washington County transportation plan and RTP.	Washington County	5/6/10	Amend as requested.
278	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-162 -- Throughway Network Gaps and Deficiencies – Shute Road is now called Brookwood Parkway, so the interchange improvements at Shute (project #11178) should read Brookwood Parkway.	Washington County	5/6/10	Amend as requested.
279	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-165 -- RTP Projects by Cost and Mode – This is a prime corridor for freight movement, so the stated one percent of total project cost for the Freight category seems low. Suggest that you consider adding a footnote to the Freight category stating that “projects with significant freight benefits may be classified under the Roads and Bridges or Highways categories”.	Washington County	5/6/10	Amend as requested.
280	RTP Chapter 4 - Mobility Corridor Strategies	MC4 P 4-36 Summary of Needs table. In the Arterial Network Gaps and Deficiencies, it lists SE Oak, Washington, Alder, Main, Salmon, Caruthers, Division Pl. and Ivon as arterials. They are local streets. If anything, SE 11th and 12th should be added.	City of Portland	5/6/10	Amend as requested.
281	RTP Chapter 4 - Mobility Corridor Strategies	MC4- When totaling investment they seem to be double counting with Portland Milwaukie light rail; it's not clear what projects are included and which ones are not.	City of Portland	5/6/10	Amend as requested. Language will be added to clarify which projects are included for each mobility corridor strategy ad to acknowledge there is overlap in the analysis areas of the mobility corridors, with some projects, like high capacity transit, being included as part of multiple mobility corridors.
282	RTP Chapter 4 - Mobility Corridor Strategies	Washington County staff are not comfortable with adopting Chapter 4 by ordinance and would like to discuss the possibility of recommending adoption by Resolution and Order. We believe Metro could be consistent with the TPR without adopting Chapter 4 as a land use decision. While the Mobility Corridor work that has been done to date is a good first step, we believe it isn't developed enough at this point to enable local governments to clearly understand its implications or to develop TSPs that are consistent with the work as it stands.	Washington County	5/6/10	Amend introduction in Chapter 4 to clarify how local governments are expected to use the information per comment #171. In addition, amend RTFP Section 3.08.210 to add a new subsection as follows, " <b><u>When determining its transportation needs under this section, a city or county shall consider the regional needs identified in the mobility corridor strategies in Chapter 4 of the RTP.</u></b> " and remove the following provision from subsection B " <i>Regional needs identified in the mobility corridor strategies of Chapter 4 of the RTP.</i> "
283	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-166 -- 2035 Investment Strategy – Glencoe Rd. is outside Metro boundaries so why is the Glencoe/Hwy. 26 IAMP mentioned here?	Washington County	5/6/10	Amend to delete Glencoe Rd/Hwy 26 IAMP reference.
284	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-163 -- Regional Freight Network Gaps and Deficiencies – How was the stated lack of freight reliability on Murray Blvd. determined? There wouldn't seem to be that much of a mid-day congestion problem there, based on model plots.	Washington County	5/6/10	Amend to delete Murray Blvd as a freight deficiency.



## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
285	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-137 – Needs Assessment – Nowhere in this introductory text is it explicitly stated that what this corridor needs most is additional highway and interchange capacity.	Washington County	5/6/10	Amend to more explicitly call out the need for additional arterials, transit, highway and interchange capacity consistent with the adopted Western Bypass Study recommendations (Resolution No. 97-2497) and OR 217 study recommendations (Resolution No. 06-3658).
286	RTP Chapter 4 - Mobility Corridor Strategies	MC 4- This section could be rewritten to elaborate on the context, add local-level ped and bike needs, strengthen the narrative which focuses only the Freeway and not other modal facilities, etc.	City of Portland	5/6/10	No change recommended. Mobility corridor introductions will be deleted and rely on the tables that display different parts of the system within the corridor.
287	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-163 -- Safety Deficiencies – There are more than the two locations listed for this corridor that have safety deficiencies.	Washington County	5/6/10	No change recommended. Staff is still working with ODOT and the Regional Safety Work Group on better data analysis methodologies, including disaggregating ODOT to local government boundaries. This work will allow us to better identify the safety needs in each mobility corridor. This work will be provided to local governments for their Transportation System Plans when it is available, and will be included in the next RTP.
288	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-144 -- Unfunded Projects – The OR 217 improvement project listed here for \$200 million seems relatively inexpensive. What is this project?	Washington County	5/6/10	Amend as requested to clarify what project is being referenced.
289	RTP Chapter 4 - Mobility Corridor Strategies	Page 4-144 -- Strategy Long-term – What's the "new parallel arterial to remove local auto trips from OR 217"?	Washington County	5/6/10	No change recommended. This was listed as a potential strategy for local governments to evaluate as part of their TSP updates. The county and cities of Washington County have already identified several bike, pedestrian, collector and arterial connections to serve this part of the region. Title 1 of the RTFP calls for local TSPs to identify additional connections, where practicable, to improve connectivity of the regional system and maintain performance of the Throughway system as much as feasible.
290	RTP Chapter 4 - Mobility Corridor Strategies	MC #2 describes Washington Square Regional Center and Interstate MAX, aren't these located outside the boundaries of on the MC#2 map?	Southwest Neighborhoods Inc.	5/6/10	Amend as requested.
291	RTP Chapter 5 - Performance Evaluation	Living within 1/2 mile of a bus stop is a good performance measure but it should only be measured if people have ADA compliant pedestrian facilities to enable people of all abilities to get to that bus stop safely.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. Lack of available and consistent data sources preclude this detailed level of analysis at a region wide level at this time.
292	RTP Chapter 5 - Performance Evaluation	The proposed regional goals are based on regional averages and we believe a more equitable approach would have a minimum target level for alternative modes for all areas of the region. We recommend that the outcome-based performance measures allow a "dashboard" look at key indicators that describe progress toward meeting goals and more detailed measures that help determine where additional resources are needed in localized areas to meet regional equity goals.	Southwest Neighborhoods Inc.	5/6/10	No change recommended. Table 2.5 Regional Modal Targets establish non-drive alone mode share targets by 2040 design type. Additionally, the performance management system includes a performance monitoring phase in between RTPs that will track progress toward meeting regional goals. Consistent with regional goals, local TSPs may choose to develop more detailed measures to assist local decision making. Metro will continue to improve data collection, methods for evaluation and monitoring to better track progress toward the region's desired outcomes and communication of that progress (including a dashboard approach).

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
293	RTP Chapter 6 - Implementation	Page 6-22 under Proposed Urban Growth Management Functional Plan Revisions it reads, "Require adoption of parking management plans in centers and along high capacity transit corridors." Move this bullet under the RTFP revisions.	TriMet	5/5/10	Amend as requested
294	RTP Chapter 6 - Implementation	Page 6-23 the final bullet should also include the need to better understand health and affordability outcomes. Change text to read, "Metro and regional partners continue model enhancements and develop data collection and performance monitoring system, to better understand the relationship between compact urban form, <b>transportation policies and investments, greenhouse gas emissions, health outcomes, and combined housing/transportation costs.</b> "	TriMet	5/5/10	Amend as requested.
295	RTP Chapter 6 - Implementation	page 6-26 under the Climate Change Action Plan change second bullet to read "Healthy environment, <b>Healthy people</b> , and Health economy"	TriMet	5/5/10	Amend as requested.
300	RTP Chapter 6 - Implementation	To respond to the urgency of climate change, the region should revisit the RTP project list once Metro has completed evaluation of GHG scenarios. Rather than wait until adoption of the next RTP update, the region should immediately move to conform project lists to the chosen scenario. The RTFP should be amended at that time to require local TSP updates conform to the GHG scenario. Language to this effect should be added to the draft RTP update.	Coalition for a Livable Future	5/6/10	Amend Climate Action Plan on page 6-26 of Chapter 6 to state that the RTP and RTFP may be amended to reflect recommendations from this effort or if new tools, legislation, and/or scientific understanding demonstrate that additional RTP policies, performance targets, investment priorities or functional plan requirements should be adopted prior to the next RTP update. Additional amendments may be identified for MPAC, JPACT and Metro Council consideration as part of the next RTP update between June, 2012 and June, 2014.
296	RTP General Comments	<ol style="list-style-type: none"> <li>The transportation plans do not use the population and employment forecasts the Metro Council adopted last December.</li> <li>They are not based on a future urban form that utilize the urban and rural reserves expected to be adopted by the Metro Council on June 3. Instead they utilize a future urban form controlled by an application the hierarchy of land statute (ORS 197.298) that excluding urban reserves.</li> <li>They are based on a future urban form (population and employment allocations by TAZ) that underestimated how efficiently existing urban land can be utilized (these rates are even below present observed rates), and emphasizes expansion over efficient utilization. <ul style="list-style-type: none"> <li>In short, the RTP should carry out 2010 growth management decisions, rather than 2002 decisions.</li> </ul> </li> </ol>	City of Portland	5/6/10	No change recommended. The analysis conducted for the RTP reflects the most current TAZ- land use assumptions available. In 2011, work will bring to prepare a new land use forecast that reflects the Urban/Rural reserve process, the adopted RTP "state" investment strategy and the Capacity Ordinance that is anticipated to be adopted in Dec. 2010. The new forecast will be developed in consultation with the region's cities and counties, and once finalized, will be available for Metro and local governments to use for planning purposes.

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
297	RTP General Comments	Metro's land use and transportation plans should be better coordinated as required by Statewide Planning Goal 2. The Land use plans have a more current population and employment forecast, more accurate characterization of present and expected infill and redevelopment rates, employ urban and rural reserves, and describe a more compact and efficient urban form. The 2035 RTP assumptions are different, older, and less accurate than assumption of the 2010 land use plans. One set of facts and assumptions must be used for both the land use and transportation plans.	City of Portland	5/6/10	No change recommended. The analysis conducted for the RTP reflects the most current TAZ- land use assumptions available. In 2011, work will bring to prepare a new land use forecast that reflects the Urban/Rural reserve process, the adopted RTP "state" investment strategy and the Capacity Ordinance that is anticipated to be adopted in Dec. 2010. The new forecast will be developed in consultation with the region's cities and counties, and once finalized, will be available for Metro and local governments to use for planning purposes.
298	RTP General Comments	Plan policies must be carried out with sufficient and effective implementing measures as required by Statewide Planning Goal 2. The 2035 RTP has a very good policy set which we support. But the RTP project lists do not adequately support these policies - particularly reduction in total vehicle miles traveled and reduction in greenhouse gas emissions. These project lists perform worse in some areas than a no-build alternative.	City of Portland	5/6/10	No change recommended. Adoption of the RTP (and RTFP) will trigger local plan updates that will begin implementing the new RTP policies. Local TSPs will consider a more comprehensive set of actions, measures and strategies than previous plans and should result in new and refined projects that better support local and regional goals to reduce VMT and GHG emissions.
299	RTP General Comments	The current RTP update is an incredibly complex process that has been inaccessible to nearly all of the public, yet is key to determining the strategies for allocating billions of federal dollars over the next decades. The public deserves a much greater role in this decision-making and we recommend that Metro increase its public education and seek input from the public early in the process. Metro should conduct targeted outreach to traditionally underserved communities as well as conducting general outreach and convening citizen advisory committees, including a committee focusing on equity.	Coalition for a Livable Future	5/6/10	No change recommended. Metro did conduct targeted outreach to traditionally underserved communities to guide development of the goals of the plan early in the process. Metro will work to continue to enhance the tools and methods by which to engage these communities as engaged in future efforts as well as improve our data and methodologies for evaluating the potential impacts of policies and projects on minorities, low-income families, and other federally-defined environmental justice populations. The improved tools and methods will be used in future RTP updates.
301	RTP Glossary	The glossary includes two different definition of affordable housing - p.G-1 "Affordability" vs p. G-9 "Housing affordability". Change both references to read: "Housing affordability is defined using a percentage of gross household income. Housing is considered affordable when it costs 30% or less of gross household income."	Tom Cusack, Oregon Housing Blog and Cathy Briggs, Oregon Opportunity Network	5/1/10	Amend Glossary entry for "housing affordability" to read " <b><u>See cost-burdened household.</u></b> " Amend Glossary entry for "affordability" to read " <b><u>See cost-burdened household.</u></b> " Add entry in Glossary " <b><u>Cost-burdened household: a renter household that spends more than 50 percent of its gross income on housing and transportation expenses. Housing and transportation costs include all expenditures tracked under those two categories by the U.S. Bureau of Labor Statistics in the Consumer Expenditure Survey.</u></b> "

## ITEMS FOR CONSIDERATION

#	Category	Comment	Source(s)	Date	Recommended Action
302	RTP Glossary	Page G-3 Need definition of On-Street Bus Rapid Transit in glossary. Add definition (either pg G-3 as add-on to BRT or pg. G-15 under "O"): <b><u>On-Street Bus Rapid Transit (On-Street BRT) – A version of Bus Rapid Transit (see separate definition in Glossary) with limited stops and service at least every 15 minutes during much of the day though frequencies by increase or decrease for individual applications based on demand. On-Street BRT operates mostly in general purpose traffic lanes, mixed with other traffic, thought transit preferential treatments which could include short bus-only lanes and/or queue jumps can be included. Stops are generally spaced on-quarter mile apart or more. Passenger amenities and information similar to BRT. Due to its flexibility, On-Street Bus Rapid Transit can have attributes that are more like High Capacity Transit or like Frequent Service Bus and may be considered as a mode in either depending on circumstances.</u></b>	TriMet	5/5/10	Amend as requested to include definition in the glossary.
303	RTP Glossary	Page G-13 need definition for Major Bus Stops. Add definition " <b><u>Major Bus Stop – Major Bus Stops are in intended to provide highly visible and comfortable bus stops to encourage greater use of transit. Major Bus stops include most Frequent Service bus stops, most transfer locations between bus lines (especially when at least one of the bus lines is a frequent service line), stops at major ridership generators (e.g., schools, hospitals, concentrations of shopping, or high density employment or employment), and other high ridership bus stops. These stops may include shelters, lighting, seating, bicycle parking, or other passenger amenities and are intended to be highly accessible to adjacent buildings while providing for quick and efficient bus service. Major Bus Stop locations are shown in Figure 2.15.</u></b> "	TriMet	5/5/10	Amend as requested, add definition to Regional Transportation Functional Plan and amend major bus stop designations in Figure 2.15 (Regional Transit Network) consistent with the definition in consultation with TriMet.
304	RTP Chapter 2 - Vision	Page 2-57 JOBS section, it says "In 2008, 14,80 direct jobs..." The number should be 14,800.	Metro staff	5/6/10	Amend as requested.

**Exhibit I to Ordinance No. 10-1241A**  
**Findings of Fact and Conclusions of Law**

*Under development*

## **STAFF REPORT**

IN CONSIDERATION OF ORDINANCE NO. 10-1241A FOR THE PURPOSE OF AMENDING THE 2035 REGIONAL TRANSPORTATION PLAN (FEDERAL COMPONENT) AND THE 2004 REGIONAL TRANSPORTATION PLAN TO COMPLY WITH FEDERAL AND STATE LAW; TO ADD THE REGIONAL TRANSPORTATION SYSTEMS MANAGEMENT AND OPERATIONS ACTION PLAN, THE REGIONAL FREIGHT PLAN AND THE HIGH CAPACITY TRANSIT SYSTEM PLAN; TO AMEND THE REGIONAL TRANSPORTATION FUNCTIONAL PLAN AND ADD IT TO THE METRO CODE; TO AMEND THE REGIONAL FRAMEWORK PLAN; AND TO AMEND THE URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN

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Date: April 28, 2010

Prepared by: Kim Ellis, 503-797-1617

### **BACKGROUND**

Metro is the regional government responsible for regional land use and transportation planning under state law and the federally-designated metropolitan planning organization (MPO) for the Portland metropolitan area. As the federally-designated MPO, Metro is responsible for updating the RTP every four years, which includes updating goals and policies to guide transportation investments, and compiling a financially constrained list of projects and programs to meet requirements for federal funding. Metro is also responsible for developing a regional transportation system plan (TSP), consistent with Oregon Transportation Planning Rule (TPR) requirements.

Metro's jurisdictional boundary encompasses the urban portions of Multnomah, Washington and Clackamas counties. Metro's planning partners include the 25 cities, three counties and affected special districts of the region, ODOT, Oregon Department of Environmental Quality (DEQ), Port of Portland, South Metro Area Rapid Transit (SMART), TriMet and other interested community, business and advocacy groups as well as state and federal regulatory agencies such as the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). Metro also coordinates with the City of Vancouver, Clark County Washington, the Port of Vancouver, the Southwest Washington Regional Transportation Council (RTC), C-Tran, the Washington Department of Transportation, the Southwest Washington Air Pollution Control Authority and other Clark County governments on bi-state issues. The Southwest Washington Regional Transportation Council is the federally designated MPO for the Clark County portion of the Portland-Vancouver metropolitan region.

### **A NEW APPROACH FOR THE REGIONAL TRANSPORTATION PLAN**

The Metro Council initiated the 2035 RTP Update on September 22, 2005 with approval of Resolution No. 05-3610A (for the Purpose of Issuing a Request for Proposals to Develop a Work Scope for an Expanded 2005-08 Regional Transportation Plan Update that Incorporates the "Budgeting for Outcomes" Approach to Establishing Regional Transportation Priorities).

The update involves a new approach that included:

- (1) A strong education component to increase community and stakeholder awareness of the issues facing the region, including a growing population, climate change and economic instability.
- (2) An outcomes-based approach linked to public values to assess implementation of the 2040 Growth Concept and to evaluate and prioritize transportation investments. This approach more fully integrates land use, economic, environmental and transportation objectives in the decision-making process. Central to the RTP is an overall emphasis on outcomes, system completeness and measurable performance to hold the region accountable for making progress toward the

region's desired outcomes and state goals for reductions in drive alone trips, vehicle miles traveled and corresponding GHG emissions. The RTP includes specific performance targets and indicators that will be monitored over time, using this information to determine whether future adjustments to policies and strategies are needed.

- (3) Collaboration with regional partners and key stakeholders to resolve the complex issues inherent in realizing the region's 2040 Growth Concept.

The 2035 RTP updates the policies, projects and strategies for implementing the 2040 Growth Concept and meeting the statewide greenhouse gas emissions reduction targets at the regional and local levels. By 2035, the metro region and surrounding counties are expected to grow by more than one million people and add more than 500,000 jobs, doubling trips on the transportation system.

Through its policies, projects and strategies, the 2035 RTP aims to:

- support the region's vision to use land inside the UGB as efficiently as possible to reduce the need for costly new infrastructure and protect farm and forest lands
- attract jobs and housing to downtowns, main streets and employment areas
- increase safety and provide affordable transportation options for everyone
- increase the use of public transit and reduce travel distances and the need to travel by car to help reduce air pollution and our carbon footprint
- planned urban form and cultural legacy.complete gaps in existing roads, bridges, transit service, sidewalks and bike facilities
- improve interchanges and strategically add capacity to the region's highway system
- build trails and other connections to make it safer and more convenient to walk and bike
- use technology to make travel safer, more efficient and reliable for cars, trucks and transit
- ensure investments are equitable and that they protect and enhance the region's unique setting and natural environment

All of these strategies and investments will help the region make the most out of what we have, address growing congestion more comprehensively and make travel more convenient, affordable and reliable for everyone – including businesses and freight shippers. They will also provide real options for walking, biking and using transit and help the region's businesses and industries create and retain jobs and remain competitive.

The following outcomes, endorsed by the Metro Policy Advisory Committee (MPAC) in May 2008 and adopted by the Metro Council in Resolution No. 08-3940, provided the framework for the updated policies, projects and strategies:

**Desired outcomes for a successful region**

1. People live and work in vibrant communities where they can choose to walk for pleasure and to meet everyday needs.
2. Current and future residents benefit from the region's sustained economic competitiveness and prosperity.
3. People have safe and reliable transportation choices that enhance their quality of life.
4. The region is a leader in minimizing contributions to global warming.
5. Current and future generations enjoy clean air, clean water and healthy ecosystems.
6. The benefits and burdens of growth and change are distributed equitably.

## **SUMMARY OF DECISION-MAKING PROCESS**

Metro's transportation planning activities are guided by a federally mandated decision-making framework known as the metropolitan transportation planning process. Metro leads this process in consultation and coordination with federal, state and local governments, and engagement of other stakeholders with an interest in or who are affected by this planning effort. Metro facilitates this consultation and coordination through four advisory committee bodies—the Joint Policy Advisory Committee on Transportation (JPACT), MPAC, the Transportation Policy Alternatives Committee (TPAC) and the Metro Technical Advisory Committee (MTAC).

The 2035 RTP update process relied on this existing decision-making structure for development, review and adoption of the plan. MPAC, JPACT and the Metro Council made recommendations at key decision points based on input from TPAC, MTAC, the Council-appointed Regional Freight Plan Task Force and the public participation process.

Technical work groups were formed to advise Metro staff on the development of work products throughout the process. Metro technical staff also worked with the Regional Travel Options Subcommittee to TPAC, the Intelligent Transportation Systems (ITS) Subcommittee to TPAC and the Regional Trails Working Group throughout the update process. The Metro Committee for Citizen Involvement provided advice on public engagement activities.

## **THE 2035 RTP UPDATE PROCESS AND DECISION TIMETABLE**

### **Federal component: 2005-2008**

Metro began the 2035 Regional Transportation Plan update in fall 2005, with early scoping that involved regional partners, community organizations and other stakeholders. Work from fall 2006 through fall 2007 included considerable stakeholder and public involvement to determine needs and develop policies that provided a framework to guide the update of the RTP. In fall 2006, Metro held nine stakeholder workshops that engaged 127 individuals and 50 different community organizations and government entities to help shape policy goals. Four of the workshops were held with Metro's existing advisory committees. The other five workshops were held with business and community groups that represented specific public interests, public responsibilities or groups historically underrepresented in transportation planning and decision-making.

To meet planning requirements in the most recent transportation authorization act, the Safe, Accountable, Flexible, Efficient Transportation Equity Act—a Legacy for Users (SAFETEA-LU), Metro consulted with state and federal resource agencies through the collaborative Environmental Transportation Agreement for Streamlining work group. The CETAS group consultation, which was held on October 16, 2007, included representatives from tribal groups, ODOT and 10 state and federal transportation, natural resource, cultural resource and land use planning agencies.

Other work through fall 2007 included technical workshops, informal feedback cards and questionnaires, scientific public opinion surveys, and a formal, 30-day public comment period with open houses and public hearings.

In December 2007, the Metro Council adopted the federal component of the 2035 RTP to meet planning requirements in the most recent transportation authorization act, the Safe, Accountable, Flexible, Efficient Transportation Equity Act—a Legacy for Users (SAFETEA-LU). The U.S. Department of Transportation approved the federal component of the 2035 RTP on March 5, 2008.

### **State component: 2008-2010**

Following approval of the federal RTP, the focus turned to the completion of a final RTP to meet regional and state land use goals and the Oregon Transportation Planning Rule. On May 1, 2008, the LCDC accepted the RTP in the manner of periodic review and approved the work program and timeline for the state component of the RTP, which called for its completion by December 2009.



During 2008 and 2009, RTP work focused on framing and refining transportation and land-use choices as part of the broader *Making the Greatest Place* effort. This comprehensive effort seeks to integrate local and regional land use and transportation investments to focus future population and employment growth in centers, corridors, and employment areas, consistent with the 2040 Growth Concept. This work included the evaluation of different land-use and transportation investment scenarios.

To provide a forum for discussions, MPAC and JPACT held three joint meetings between October and December 2008, to discuss transportation and investment policy choices that would be made in the next year or two. More than 100 people attended the joint meetings, which included the elected officials who are members of those committees, other elected officials, local government staff, non-government partners and members of the interested public. The results of those meetings helped prioritize transportation investments that would best support desired land uses and reduce travel distances.

During January 2009, Metro and Oregon Department of Transportation staff conducted 14 coordination interviews with local transportation agencies to provide information about the RTP's mobility corridor concept and to identify issues within each of the 24 corridors in preparation for future workshops.

Through March and April 2009, Metro and ODOT hosted seven mobility corridor workshops by geographic region to identify common mobility gaps and deficiencies and discuss the desired function of each corridor and individual transportation facilities. These meetings helped to develop a new Mobility Corridor Atlas and identify priority projects.

Metro also convened a bicycle work group to identify policy refinements to respond to public comments received during the federal component of the RTP update and to incorporate active transportation policy recommendations identified by the Blue Ribbon Committee for Trails.

At the same time, Metro and its regional partners continued to work on related planning efforts that will be included in the RTP: the Sunrise Corridor project, the I-5/99W connector study, the Sellwood Bridge study, the High-Capacity Transit (HCT) system plan, the Regional Freight Plan and the Transportation System Management and Operations (TSMO) plan. Metro also worked with communities around the region to identify their local land use, transportation and public infrastructure-related aspirations for managing growth and the investments needed to support them.

The technical analysis and policy development guided further system development and refinement before soliciting projects and funding strategies from the region's 25 cities, three counties, TriMet, South Metro Area Rapid Transit (SMART), Port of Portland and the Oregon Department of Transportation (ODOT) – the region's transportation providers. On June 15, 2009, the Metro Council, in conjunction with JPACT and MPAC, issued a "call for projects" to refine RTP investment priorities. The RTP goals, performance targets and refinement criteria provided policy direction for investment priorities to be brought forward for consideration in the final 2035 RTP.

#### **JPACT-ENDORSED CRITERIA TO REFINE INVESTMENT PRIORITIES**

- Make multi-modal travel safe and reliable
- Target investments to support local aspiration and the 2040 Growth Concept
- Provide multi-modal freight mobility and access
- Expand transit coverage and frequency
- Expand active transportation options
- Reduce transportation-related greenhouse gas emissions
- Address transportation needs of underserved communities

Projects were solicited from county coordinating committees, the city of Portland, TriMet, SMART, the Port of Portland and ODOT. Each project sponsor was requested to identify investment priorities consistent with the draft RTP performance targets and criteria, and within the funding target established by JPACT. Projects and programs were requested to come from plans or studies that had been developed through a public process. The solicitation resulted in 1,058 proposed projects with a total estimated cost of \$19.6 billion.

The draft RTP and projects, draft TSMO Plan, draft Regional Freight Plan and draft HCT System Plan summary report and complete list of projects were released for a 30-day public comment period that was held from September 15 to October 15, 2009. The RTP comment package was released as part of the Making the Greatest Place effort and Metro's chief operating officer's recommendation titled "Strategies for a sustainable and prosperous region."

Forty-five days before the opening of the public comment period, electronic notices were distributed to all regional neighborhood associations, citizen participation organizations and interested parties who had asked to be included in Metro's notification lists. The notices included information on how to access the review draft online, dates and times of public open houses and hearings, and instructions on different options for submitting comments.

During the comment period, seven open houses and five public hearings were held. A Spanish interpreter was present at events held in Hillsboro, Gresham and North Portland, where large concentrations of Spanish speakers are known to live. The ability to engage an interpreter at any of the events was promoted in display ads and through a flyer in Spanish that was distributed to organizations that serve Spanish-speaking people in those communities.

On December 17, 2010, the Metro Council approved Resolution No. 09-4099, directing staff to:

- incorporate amendments recommended to respond to public comments received in a final draft RTP
- conduct a final analysis for conformity with the federal Clean Air Act
- prepare findings, and the functional plan amendments needed to implement the new policies and strategies.
- release the final draft RTP 45 days of public comment beginning in March 2010, before MPAC, JPACT and the Metro Council consider approval by ordinance in June 2010.

In early 2010, staff prepared documents to be released for a third and final 45-day public comment period and hearings. Forty-five days before the comment periods opened, electronic notices were sent to all neighborhood associations, citizen participation organizations, jurisdictions, tribes with any potential interest in the area, business and community stakeholders, and all individuals who asked to be included in our list of interested parties announcing the comment period and providing information on how to comment. A second notice was sent when the comment period opened. A public notice was published in *The Oregonian*, the newspaper of record for the metro area, and display ads were published in all ethnic newspapers and community newspapers. A press release was published on the Metro web site and sent to all area media.

Attachment 1 is a full public comment report that provides a more detailed summary of the stakeholder and public involvement conducted from Spring 2006 to Spring 2010, including documentation of specific comments received during the most recent public comment period. MPAC, JPACT and the Metro Council considered public comments received prior to action on this ordinance.

## ANALYSIS/INFORMATION

1. **Known Opposition:** None known.
2. **Legal Antecedents:** Several Federal, State and regional laws and actions relate to this action.

Federal regulations include:

- Clean Air Act, as amended [42 U.S. C. 7401 and 23 U.S.C. 109(j)], as amended].
- US EPA transportation conformity rules (40 CFR, parts 51 and 93).
- USDOT rules that require Metro to update RTPs on a four-year cycle [23 CFR 450.322(a)].

State regulations include:

- Statewide planning goals.
- Oregon Administrative Rules for Transportation Planning (OAR Chapter 660, Division 12).
- Oregon Transportation Plan and implementing modal plans, including the Oregon Highway Plan.
- Oregon Administrative Rules for Transportation Conformity, (OAR Chapter 340, Division 252).
- 2006 State Implementation Plan (SIP).
- 2006 Portland Area Carbon Monoxide Maintenance Plan and 2007 Portland Area Ozone Maintenance Plan.

Metro legislation includes:

- Resolution 05-3610A, “For the Purpose of Issuing a Request for Proposals to Develop a Work Scope for an Expanded 2005-08 Regional Transportation Plan Update that Incorporates the “Budgeting for Outcomes” Approach to Establishing Regional Transportation Priorities” adopted by the Metro Council on September 22, 2005.
- Resolution No. 06-3661, “For the Purpose of Approving A Work Program For the 2035 Regional Transportation Plan (RTP) Update and Authorizing the Chief Operating Officer to Amend Contract No. 926975)” adopted by the Metro Council on June 15, 2006.
- Resolution No. 07-3793, “For the Purpose of Accepting the Chapter 1 Regional Transportation Policy Framework as the Provisional Draft For the Purpose Of Completing Phase 3 of the 2035 Regional Transportation Plan (RTP) Update” adopted by the Metro Council on March 15, 2007.
- Resolution 07-3831B, “For the Purpose of Approving The Federal Component of the 2035 Regional Transportation Plan (RTP) Update, Pending Air Quality Conformity Analysis” adopted by the Metro Council on December 13, 2007.
- Resolution No. 08-3911, “For the Purpose of Approving the Air Quality Conformity Determination For the Federal Component of the 2035 Regional Transportation Plan and Reconfirming the 2008-2011 Metropolitan Transportation Improvement Program” adopted by the Metro Council on February 28, 2008.
- Resolution No. 08-3940, “For the Purpose of Affirming a Definition of a ‘Successful Region’ and Committing Metro to Work With Regional Partners to Identify Performance Indicators and Targets and to Develop a Decision-Making Process to Create Successful Communities” adopted by the Metro Council on June 26, 2008.
- Resolution No. 09-4052, “For the Purpose of Accepting the Regional High Capacity Transit System Tiers and Corridors, System Expansion Policy Framework and Policy Amendments” adopted by the Metro Council on July 9, 2009.

- Resolution No. 09-4099 “For the Purpose of Accepting the Draft 2035 Regional Transportation Plan, With the Following Elements, For Final Review and Analysis For Air Quality Conformance: The Transportation System Management and Operations Plan; The Regional Freight Plan; The High Capacity Transit System Plan; and The Regional Transportation Functional Plan” adopted by the Metro Council on December 17, 2009.
- Resolution No. 10-4150A, “For the Purpose of Approving the Air Quality Conformity Determination for the 2035 Regional Transportation Plan and the 2010-2013 Metropolitan Transportation Improvement Program” adopted by the Metro Council on June 10, 2010.

3. **Anticipated Effects:** With approval:

- Staff will submit the final RTP and findings to LCDC in the manner of periodic review.
- Staff will submit the final RTP to the U.S. Department of Transportation.

4. **Budget Impacts:** There is no financial impact to approval of this ordinance.

**RECOMMENDED ACTION**

Staff recommends approval of Ordinance No. 10-1241A.

CLICK HERE FOR FULL REPORT

May 2010

Public comment report



## Attachment 1 to Staff Report to Ordinance No. 10-1241A

# 2035

REGIONAL TRANSPORTATION PLAN

Public comment report

May 2010

 Metro | Memo

Date: May 5, 2010

To: MPAC

From: MPAC employment subcommittee:  
Robin McArthur, Metro, Chair of Subcommittee  
Mayor Shane Bemis, City of Gresham, Chair of MPAC  
Mayor Sam Adams, City of Portland  
Mayor Denny Doyle, City of Beaverton  
Councilor Carl Hosticka, Metro  
Councilor Rod Park, Metro  
Mayor Jerry Willey, City of Hillsboro  
Richard Whitman, Director of DLCD  
Charlie Allcock, PGE  
Gary Barth, Clackamas County  
Steve Dotterer and Bob Clay, City of Portland  
Susie Lahsene, Port of Portland  
Steve Peterson, CH2M Hill  
Patrick Quinton, PDC  
Pat Ribellia, City of Hillsboro  
Doug Rux, City of Tualatin  
Mike Wells, Cresa Partners; Mark Clemons, Group Mackenzie

Re: Final report to MPAC on addressing large-industrial-site demand

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**Background:**

Attracting and retaining traded-sector industrial companies is critical to the region's economic prosperity. Traded-sector companies sell goods to buyers outside of the Metro region, bringing additional wealth into the region. The 2009 Urban Growth Report (UGR) identified demand for an additional 200 to 1,500 acres in large lot configurations (more than 50 buildable acres in a single site) for traded-sector industrial uses. The MPAC employment subcommittee was formed to consider how the growth management decisions that will be made in December 2010 can address large lot demand and help the region to achieve its desired outcomes.

The subcommittee's recommendations to MPAC include short-term and long-term strategies, which are elaborated on in the body of this memo:

#### Short-term strategies for providing large sites

- Strengthen Title 4 of the Urban Growth Management Functional Plan to protect against specific conflicting uses (parks, schools, churches) in Regionally Significant Industrial Areas
- Create a large-site-metering system
- When making a growth management decision in 2010, consider factors such as the current trend in unemployment rates, the employment forecast, the need for site choices, and the region's history of developing large lots added to the UGB.

#### Long-term strategies for providing large sites

- Pursue new infrastructure funding strategies to make sites development-ready
- Elevate brownfield cleanup to a regional priority
- Require concept planning of urban reserves before UGB expansion
- Revamp Title 4 of the Urban Growth Management Functional Plan to recognize blurry boundaries between employment uses
- Explore the concept of large-lot industrial tax deferral

This memo is organized under two broad themes:

- Recommendations for large sites already inside the UGB
- Recommendations if UGB expansions are made to provide additional large sites

### **Subcommittee recommendations for large sites already inside the UGB**

#### **1. Strive to make the region's large lot inventory development-ready:**

An inventory of vacant sites is, alone, inadequate for attracting traded-sector industrial employers. The region should have a goal to increase its supply of development-ready sites. This would better align local and regional efforts with Statewide Planning Goal 9 (Economic Development), which calls for maintaining a competitive short-term supply of land for employment uses. Multiple public and private entities must collaborate to achieve a goal of making a site development ready within 180 days of approval of a development application. Infrastructure must be available, zoning must be adopted, and the site must be annexed into a city. The actions recommended in this memo would help to increase the number of development-ready sites in the region.

#### **2. Protect unique industrial areas from conflicting uses:**

Regulations are essential for protecting large industrial sites from conversion to non-industrial uses. However, there is a need to tailor land use regulations and other strategies to achieve a better balance of public and private sector benefits and burdens. The subcommittee recommends further work on two possible options:

##### Balance public and private interests with a large-lot industrial tax deferral program

Oregon's farm use tax assessment program could serve as a model for tax assessment of large, vacant industrial sites. Under the farm use assessment system, lands kept in active farm use are assessed at a lower rate through use of a tax deferral. The subcommittee recommends Metro staff research the feasibility of an industrial tax deferral program. Such a system could offset the

use restrictions placed on these sites as they await industrial development. The program would also seek to ensure that public infrastructure investments serve their intended purpose (to serve future industrial areas). Depending on the circumstances, market-rate back taxes could be collected on properties that get used or rezoned for non-industrial purposes.

The subcommittee recommends further exploration of the applicability of this concept for large, vacant industrial sites. Because this type of program would require legislative changes, it is a longer-term recommendation.

Issues for further discussion regarding a large lot tax deferral system

1. How much foregone tax revenue would such a system entail? Are there other funding mechanisms that could limit the fiscal impacts to cities if this program were instituted?
2. What are the financial incentives and disincentives that would need to be created in order for the program to work? For example, what level of back taxes may need to be incurred to discourage conversion of industrial land to non-industrial uses?
3. Is there a way to use this type of program as an incentive to encourage lot assembly?
4. What legislative changes would be necessary and how likely is it that efforts to change the law would be successful?

Focus Title 4 of the Urban Growth Management Functional Plan on protecting Regionally Significant Industrial Areas

Title 4 of the Urban Growth Management Functional Plan seeks to provide and protect a supply of sites for employment by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas, Industrial and Employment Areas.

In the short-term (before any UGB expansions are made in 2010), the subcommittee recommends that Title 4 be amended to prohibit new schools, places of assembly, recreation facilities and parks (with exceptions for habitat protection) in Regionally Significant Industrial Areas.

In the long-term (2011), the subcommittee recommends more significant changes to Title 4 and the Title 4 map. These changes would implement the recommendations of the 2004 Greater Metropolitan Employment Lands Study (GMELS). Generally, the proposed changes are:

- Work with jurisdictions in the region to identify key industrial sanctuaries with unique site characteristics or infrastructure facilities.
- Focus regulations on protecting the region's most important industrial areas and their associated public facilities (e.g. transportation facilities)
- Loosen regulations in other employment areas to allow for a wider range of uses that reflects the sometimes blurry lines between industrial and non-industrial uses

**3. Prioritize brownfield cleanup as a strategy for increasing the region's supply of development-ready sites:**

Some traded-sector industrial uses require large sites with marine or other specialized terminal access or, more generally, locations in existing urban areas. These needs cannot be accommodated through UGB expansions. However, some of the region's large industrial sites are contaminated. Brownfield cleanup will be essential in order to accommodate some priority sectors.



The subcommittee recommends that brownfield cleanup be elevated to a regional priority. Brownfield cleanup should be as much of a funding priority as paying for the infrastructure necessary to make greenfield sites development-ready. New sources of funding are needed for cleanup. Federal and State legislative changes are needed to reduce future property owner liabilities.

The subcommittee suggests identifying the large sites that are regional priorities for cleanup. This could be accomplished through the use of a tiered list of priority sites. The subcommittee also recommends documenting the potential cleanup costs for high-priority brownfield sites.

**4. Pursue new infrastructure funding strategies to make sites development-ready:**

Sites will not be development-ready if public facilities are not available. Existing infrastructure funding mechanisms are inadequate for ensuring the region's economic competitiveness. According to Metro's 2008 Regional Infrastructure Analysis, the estimated cost of building the public and private facilities needed to accommodate growth in jobs and housing in the three-county Portland region through 2035 is \$27-41 billion. Traditional funding sources are expected to cover only about half that amount. Even if the region does not experience this projected growth, \$10 billion is needed just to repair and rebuild our existing infrastructure. The subcommittee recommends that new collaborative funding strategies be explored at the local, regional, and state level.

**Subcommittee recommendations if UGB expansions are made**

**5. Require concept planning of urban reserves before UGB expansion:**

A critical step towards providing development-ready sites is to complete some level of concept planning for urban reserve areas. The intergovernmental agreements that were signed by Metro and the three counties on urban and rural reserves require that concept planning be completed. These concept plans<sup>1</sup> will provide more certainty for how an area will be developed, could be used to market sites to potential firms, and would provide the means for making UGB expansions that intentionally accomplish regional and community goals. Pre-expansion concept planning would be necessary to make the UGB metering process, summarized in recommendation six, function properly.

The subcommittee recommends that pre-UGB-expansion concept plans be specific enough to inform UGB expansion decisions, but not be overly-prescriptive such that they become immediately outdated or preclude some degree of flexibility with future land uses.

Recommended contents of a concept plan for large lot industrial uses

A pre-expansion concept plan for large lot industrial uses should describe the following.

1. The suitability of the site for particular industry sectors.
2. The general locations of the types of uses desired for the area.
3. The general locations of sewer, water and storm-water systems and transportation facilities, and a description of either connections of these systems to existing systems within the UGB or a description of how decentralized infrastructure systems may be

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<sup>1</sup> Note - if UGB expansions are made in 2010, there will not be time for pre-expansion concept planning; this is a longer-term recommendation for future UGB expansion areas.

configured on site. These descriptions should include preliminary estimates of the costs to provide the facilities and services.

4. Natural features that will be subject to protection under Titles 3 and 13 of Metro's Urban Growth Management Functional Plan.
5. An understanding between or among the county, the city or cities that will provide any urban service to the area, and other service providers that determines which city, cities or special districts will be the eventual providers of urban services.
6. An understanding between or among the county and the city or cities that determines the city or cities that will have authority to annex the area, or portions of it, following addition to the UGB.
7. An evaluation of possibilities for the assembly of smaller taxlots.

#### Issues for further discussion regarding concept planning

The subcommittee recommends further discussion of the following issues regarding pre-UGB-expansion concept planning:

1. Who will pay for concept planning?
2. What level of plan specificity is appropriate?
3. Before UGB expansions are made, cities have a greater leverage to encourage cooperation amongst landowners to assemble larger sites for industrial uses. After UGB expansions are made, it is more likely that there will be landowners that will hold out for high sales prices. Because cities are unable to provide landowners with any certainty that their properties will be included in the UGB in the near term, devising a strategy for lot assembly before UGB expansions are made would be challenging. To address this challenge, the subcommittee proposes the following ideas for further consideration:
  - a. Cities could enter into option agreements with landowners to assemble large sites.
  - b. Service providers could withhold services to properties until a taxlot assembly plan or agreement is in place for a UGB expansion area.

#### **6. Create a land-metering mechanism to maintain the region's inventory of large industrial sites:**

Growth management decisions made in 2010 will provide an additional 200 to 1,500 acres in large site configurations. In order to ensure that the region maintains a supply of large industrial sites that is competitive with other regions, the MPAC employment subcommittee recommends the creation of a land-metering process that operates in the intervening years of the five-year growth management decision cycle.

With a land-metering mechanism, as large sites inside the UGB get developed, they would be replenished through fast-track UGB expansions or through an action that makes land inside the UGB available (e.g. taxlot assembly or brownfield cleanup<sup>2</sup>).<sup>3</sup> The Metro Council would return the region's large-site supply to its baseline target within a year of notification that ground has been broken on a large site.

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<sup>2</sup> Standards need to be developed to determine whether a brownfield has been cleaned sufficiently to make it part of the large site inventory. An example of possible standards for brownfield cleanup are those that DEQ applies.

<sup>3</sup> To satisfy state law, before expanding the UGB, Metro would first need to determine whether efficiency measures can be taken.

Regional large-lot demand and supply would again be reassessed in the 2014 urban growth report, which would be the basis for a growth management decision in 2015. The large lot supply that results from those decisions would be the new baseline inventory inside the UGB to maintain through 2030. The metering process would again be used in those intervening years to maintain a competitive supply within the UGB.

#### Elements of large-site-metering mechanism

1. With the 2010 growth management decision, the Metro Council establishes a baseline target for the number of vacant, buildable large sites to be maintained inside the UGB.
2. Metro and local governments identify the urban reserves with potential to provide large sites once inside the UGB.
3. Metro and local governments monitor the large-site supply inside the UGB.
4. The Metro Council adopts a fast-track process for adding industrial land to the UGB from urban reserves.
5. When the supply drops below the target (large sites are no longer vacant or buildable), the Metro Council has one year to return the baseline supply of large sites to its target. This can be accomplished either through efficiency measures such as brownfield cleanup and taxlot assembly or through a UGB expansion. If the UGB is expanded, use the fast-track process between five-year capacity cycles, or the legislative process associated with the next cycle if the drop occurs within one year of the capacity analysis. In making UGB expansions, consider the efficient distribution of employment opportunities throughout the region.
6. The Metro Council reviews the target to adjust to market changes at each five-year capacity cycle.

#### **7. Aim to accommodate priority traded-sector industries when making growth management decisions:**

A number of cities in the region have recently completed economic opportunity analyses (EOAs) that describe their economic development priorities<sup>4</sup>. These priorities include attracting several industries in traded sectors that have preferences for large lots. The specific site preferences of priority sectors listed in EOAs as well as the freight facilities that support those sectors should be a particular focus in upcoming growth management decisions.

#### **8. Location matters: policy considerations to guide where within the 200-to-1,500-acre range to plan:**

Individual industry sectors and clusters have specific site size, transportation network, infrastructure, and labor needs. Efforts to attract firms in these sectors could be more successful if there are a variety of sites in a variety of locations from which to choose. When deciding where within the 200-to-1,500-acre range to plan, MPAC and the Metro Council should plan for a point in the range that provides future firms with adequate site choices.<sup>5</sup>

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<sup>4</sup> Note – other sectors are also economic development priorities for cities in the region. This short list only includes traded-sector industries that have historically had a preference for large sites and that are mentioned in EOAs. Included are manufacturing (especially high-tech, solar, medical devices, and advanced manufacturing) and logistics, warehousing, and distribution (including marine and air terminal uses).

<sup>5</sup> If a land-metering process is adopted, as described in recommendation number six, it could reduce the risk of making more modest cyclical UGB expansions.

Examples of factors that influence demand and potential supply include:

- Current unemployment rates
- Employment forecast
- Potential adoption of a large-site-metering mechanism
- Potential adoption of additional protections for industrial areas
- Need for site choices to attract traded-sector firms and clusters
- History of development in past UGB expansion areas
- Current industrial building vacancy rates



**MEMORANDUM**

DATE: March 31, 2010

TO: Patrick Ribellia, Esq., Planning Director, CITY OF HILLSBORO

FROM: Bill Reid, Principal  
JOHNSON REID, LLC

SUBJECT: West WashCo./Metro Region Competitive Large Industrial Site Supply

As the Regional Government considers new, large industrial site supply for urbanization, on behalf of the established high tech industry, the emerging silicon solar energy manufacturing industry cluster and the incubating bio-pharma industry cluster in West Washington County, the City of Hillsboro specifically seeks to provide a supply of large, development-ready sites that is competitive with other markets nationwide that strive to grow similar targeted industry clusters.

To understand what West WashCo (aka the “heart of the Silicon Forest” in Hillsboro) currently has in terms of large industrial site supply – *not necessarily 180-day development ready* – and what it should supply to maintain competitiveness, JOHNSON REID constructed the following summary table comparing:

- Current West WashCo. UGB large industrial site “buildable” supply ***contingent upon site assembly***;<sup>1</sup>
- West WashCo.’s total 20-Year Medium Growth demand for large sites; and
- Current, development-ready supply (180-day) marketed by the Region’s identified competitors. We would underscore that competitors – Albuquerque and Austin – have each identified replacement industrial land supply exceeding a thousand acres according to officials interviewed.

Competitive Market	50-100 Acre Sites		100+ Acre Sites		50+ Acre Sites	
	Site Count	Acreage	Site Count	Acreage	Site Count	Acreage
Colorado Springs	20	1,500	5	500	25	2,000
Raleigh	2	126	12	1,470	14	1,596
Austin (Round Rock)	5	380	6	855	11	1,235
<i>West WashCo. - Medium Demand (20 yr)</i>	4	310	7	904	11	1,214
Albuquerque	3	225	9	900	12	1,125
<i>West WashCo. - Current Buildable Supply</i>	3	162	3	369	6	531

SOURCE: City of Hillsboro Vacant Lands Inventory (Dec. 2008), City of Hillsboro EOA (Mar. 2009), Johnson Reid (Feb. 2010)

- Within Hillsboro, the heart of the Silicon Forest now uncompetitively supplies 531 acres, or six 50+ acre vacant sites in total *contingent upon site assembly*, of which fewer than 400 acres are “site certified” or development-ready according to Business Oregon.
- **The Hillsboro Economic Opportunities Analyses estimated a large industrial site market demand for these 3 industry clusters of 1,214 acres over a twenty-year period.**<sup>2</sup> An available inventory of sites, that matches that market demand and reasonably development-ready, would place West WashCo “in the middle of the pack” compared to its most comparable competitors for silicon-based, high-tech manufacturing, Albuquerque and Austin.
- To be *truly* competitive, however, that inventory of sites would also have to be largely or completely development-ready for 180-day site location decisions by targeted industry clusters rather than simply “buildable.”

During the course of research, it was also learned that a large solar employer was recently forced to locate in another state because current land price in West WashCo. for limited available supply was cost-inhibitive.

<sup>1</sup> The heart of the Silicon Forest in Hillsboro currently has only one 50-100 acre tax lot site (Nike Foundation site on Shute Road) and no single, 100+ acre tax lot site.

<sup>2</sup> Medium Growth Scenario, Hillsboro Economic Opportunities Analysis, Figures 27 and 28 (March 2009).

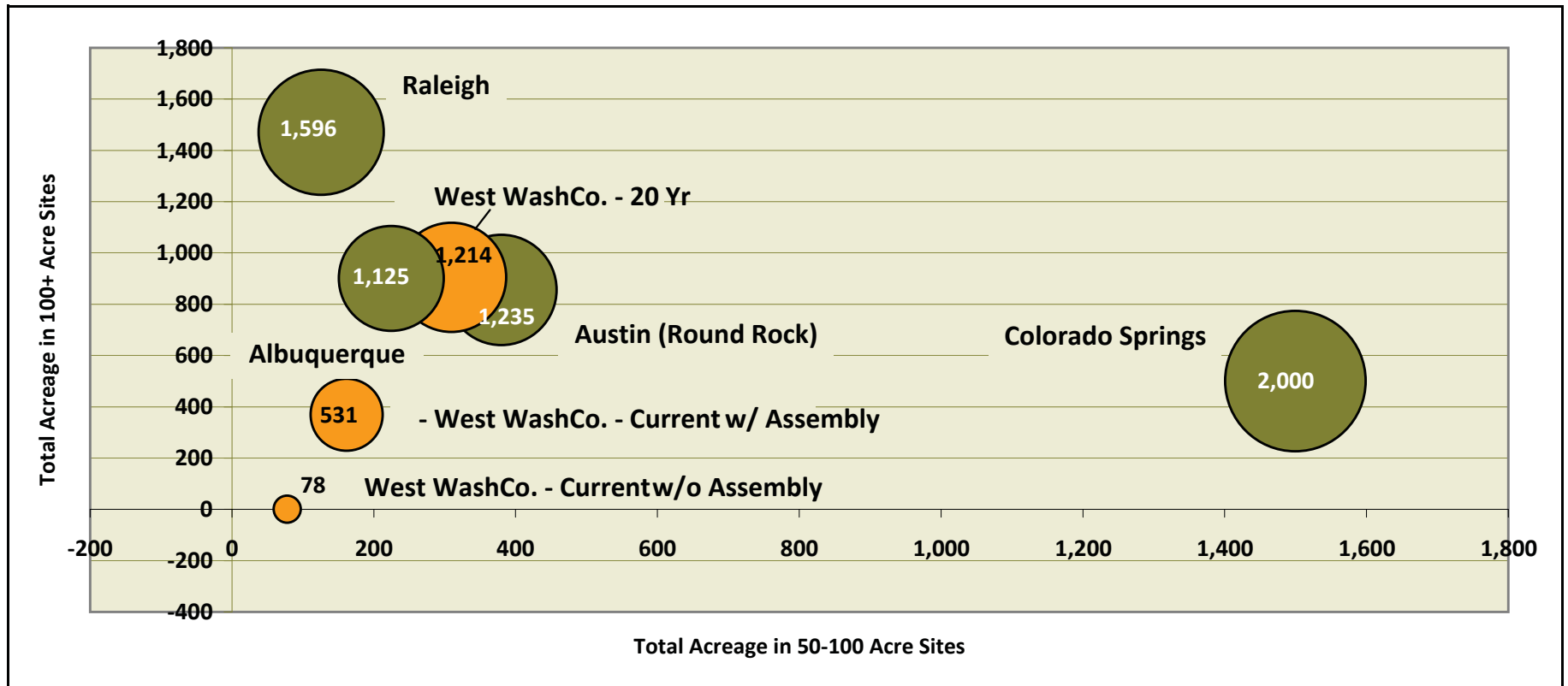


We therefore recommend the following for the heart of the Silicon Forest in Hillsboro to maximize competitiveness:

- Addition of at least 140 acres in single lot or easily-assembled 50-100 acre sites;
- Addition of at least 550 acres in single lot or easily-assembled 100+ acre sites;
- Rapid pursuit of site certification or “development-ready” status for as many sites as possible.
- Potential “clustering” of site supply in 300+ acre areas or flexible “supersites” to allow greater flexibility and competitiveness with the markets identified above, as well as Tennessee and other solar competitors.

# West Washington County/ Portland Region Large Industrial Site Competitiveness - Market Comparison

[ High-Tech, Silicon Solar Manufacturing & Bio-Pharma Large Industrial Acreage ]





**MEMORANDUM**

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DATE: January 25, 2010  
TO: Patrick Ribellia, Esq., Planning Director, CITY OF HILLSBORO  
FROM: Bill Reid, Principal  
JOHNSON REID, LLC  
SUBJECT: Competitive Markets & Market Factor Approach to Large Industrial Site Provision

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JOHNSON REID was retained by the City of Hillsboro to document the importance and need for large-site industrial “market choice” supply for successful economic development. The term “market choice” employed here is defined as the minimum site count or gross acreage of development-ready large industrial sites/parcels that ensure adequate choice for prospective industries and firms to consider for successful site selection and recruitment.

To this end, JOHNSON REID interviewed economic development professionals in a nationwide survey of market areas which have similar targeted industry recruitment to identify specific strategy and economic development policy underpinnings for other, competitive regions. The objective of this case study analysis is to understand the approach to land provision for economic development in other markets and how the availability or scarcity of large industrial sites impacts their business recruitment and marketability in business' location decisions.

In short, our findings reinforce the idea that the Portland metro area is basically unique in taking a detailed, micro-view of individual site need location, specific industry need planning, timing and land urbanization and development justification. Alternatively, nearly all markets that are frequently viewed as models or competitors, including North Carolina and Austin, Texas, regard large industrial site strategy as an issue of providing significant, prospective supply and choice based not on any study, best practice or empirical approach, but rather regional or jurisdictional economic goals and objectives and market/land owner coordination.

The sole exception, Seattle/King County, does not pursue larger manufacturers but focuses on research-based companies enabled, admittedly, by that market’s unique feature of two high-profile research and development institutions: Fred Hutchison Cancer Research Center and the University of Washington.

We first provide an overview of consensus economic development and recruitment strategy among nationwide competitors with detailed summary of large industrial site supply approach. Consensus findings are followed by individual summaries of each competitive market area profiled.

**CONSENSUS SUMMARY OF FINDINGS**

Table 1 highlights the five market areas that were evaluated in our case study. These regions were selected to reflect similar livability characteristics, and represent regions that are known to compete with Hillsboro in the recruitment of Hillsboro's target industries, namely High-Tech manufacturing and Renewable Energy Manufacturing.

**TABLE 1**

Market Area
Austin, Texas
Albuquerque, New Mexico
Seattle, Washington
Raleigh-Durham, North Carolina
Colorado Springs, Colorado





### **Organization of Economic Development**

For the most part, the approach to economic development, and particularly large sites and employer recruitment in our case study markets are similar. Typically, a market has a regional economic development lead, which most commonly is a private, non-profit Economic Development Corporation or a division of the regional Chambers of Commerce. The Economic Development Corporation is the lead in business recruitment and site location management, in coordination with local land brokers.

Localized jurisdictions typically get involved in the process of assembling incentive packages in coordination with respective state or other regional agencies. Our finding is that economic development is organized by this structure in part as a response to public economic development office restrictions on trade show travel, and other standard business recruitment expenses, as well as maintaining confidentiality of potential recruitment efforts.

### **Land Availability Strategy**

Our finding is that competing market areas are faced with a far less rigorous land use planning process and that maintaining availability of sites is most commonly a function of market factors and physical land characteristics. While most regions have allocated resources to developing target industry identification strategies and strategies for local business development, we find that case study markets are neither faced with mandated site count minimums for adequate “choice” nor maximum restrictions on the number of sites in their inventory.

In other words, large industrial site scarcity is not an artificial product of regulatory environment and, when potential site supply is reduced, regional economic development policy seeks site supply replacement/refreshment to maintain sizeable supply stock, though “sizeable” varies from market to market. Availability of alternative locations in our case study, where physical land characteristics permitted, are seen as benefited by a diversity of marketable site alternatives.

When asked how this site marketability played into their success in recruiting large employers, the overwhelming consensus was **significant**.

- According to Denis Houston, Director of Retention and Expansion for Albuquerque Economic Development Inc. "Having a diversity of sites is exceedingly important. At this stage in location selection, having the diversity [for firms] to shop multiple sites with different characteristics will "keep us in the game" as opposed to firms going elsewhere."
- This theme was echoed by Dave White, Executive Vice President of Marketing for Colorado Springs Economic Development Corp, "Site marketability and options are essential. The ability to offer a suitable site on a fast time frame is critical, without it you are not in the game."
- Conversely, Steve Gerritson, Business Development Manager for Enterprise Seattle expressed different approach with Seattle's limited physical land supply, "we're not really in the game for manufacturing. We don't have the sites... And what I do have does not pencil for those manufacturers." In the case of Seattle, education institutions and workforce that allows them to compete for research oriented firm were cited as strengths.

### ***Land Availability***

To demonstrate the issue of site availability and marketability in competing markets, on the following is a brief summary of respondents' estimate of their large industrial site inventory available.



### **Raleigh, North Carolina**

- Raleigh has a site certification program at the state and county levels.
- Raleigh reported presently having industrial large, individual sites of 60, 66, and 130 acres.
- In addition, two “super sites” of 472 and 998 acres, respectively, were reported.
- Super sites are intended for much larger potential users, but can be subdivided as a park.

### **Albuquerque, New Mexico**

- Albuquerque has more land available than any area in the case study.
- The majority of their land is concentrated around sites within two master planned areas, Mesa del Sol and SunCal.
- The first, Mesa del Sol, is among the largest master planned developments in the country covering nearly 20 square miles for employment and residential uses. The second master planned area is a SunCal project with an estimated 6,500 acres of combined employment and residential uses.
- Albuquerque Economic Development Inc. estimates they have between 8-10 parcels around 100 acres that are development-ready, or shovel-ready within 180 days, with an additional 2-3 vacant buildings in the 200,000 square foot range that have gotten attention as retrofits.

### **Colorado Springs, Colorado**

- Colorado Springs has a significant amount of vacant land to the east of the City center. The Colorado Springs Economic Development Corp. estimates they have around 35 50-100 acre sites with roughly 20 development-ready.
- They recently made a push to identify potential sites with rail access, now well above 500 acres.

### **Seattle, Washington**

- Representatives from Enterprise Seattle indicated they do not have a significant number of large sites, with "many" 20-30 acre sites but "few, if any" sites above 50 acres.
- They do not view this as problematic as economic development efforts in that market are focused on research-oriented firms that require smaller sites than manufacturers.

### **Austin, Texas**

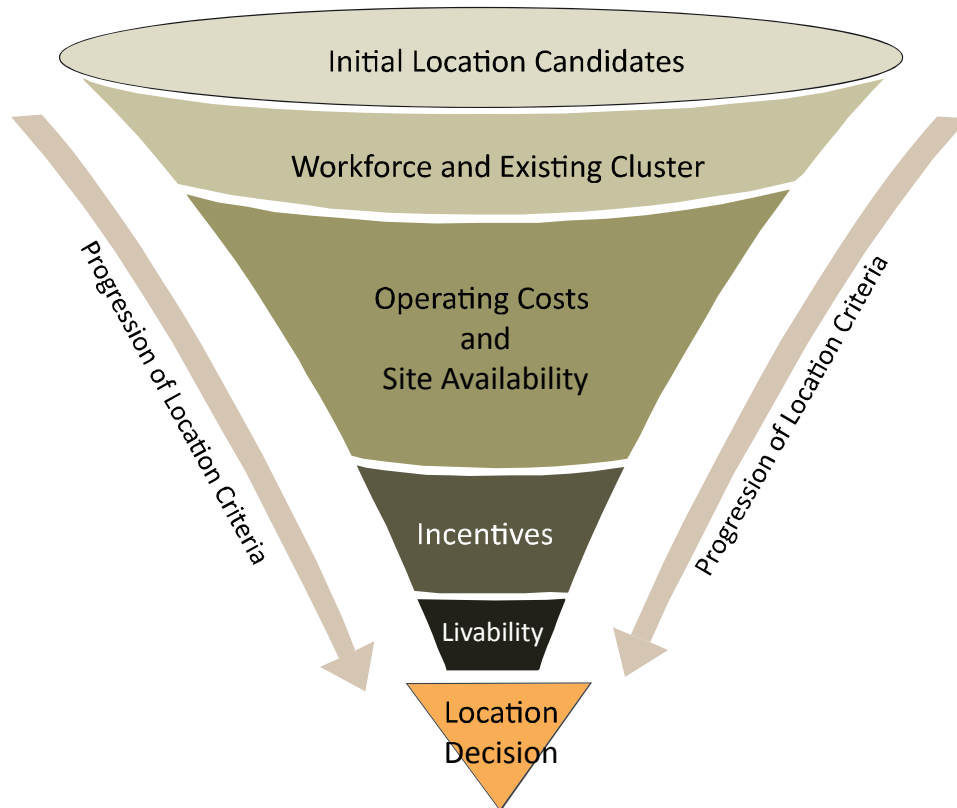
- Similar to Albuquerque, Austin has a significant amount of land available in master planned communities and various tech/industrial parks in production.
- Our survey of their inventory database found the equivalent of 520 acres available in their "featured property profile" including the Texas Clean Energy Park, a 140-acre park dedicated to the agglomeration of clean energy businesses.
- In the general database we identified well over 1,000 acres of large lot sites including 5-6 properties in the 100-to-185 acre range and a 315-acre super site.



### Process of Location Selection and Criteria

During our case study interviews, a central theme emerged time and again that became a consensus view of how firms review sites in a market, select locations and where various selection criteria fall in the process. We have organized this process into the figure below.

**FIGURE 1: BUSINESS LOCATION DECISION PROCESS**



#### *Initial Location Candidates*

Firms begin with basket of potential locations based on their preliminary understanding of these and other location characteristics. Selection process frequently starts with 10-15 location “candidates”. In other words, for particular industries or individual businesses, locations are “on the radar” because they are broadly known to have a mix or variety of favorable conditions.

#### *Workforce & Industry Criteria*

The first and most important selection criterion is the presence of an appropriately trained workforce and industry network for that firm. For some firms or industries, this could be the impact of a major educational institution, existing well-trained workforce, cluster of interrelated businesses or vendors, or most frequently a combination. Firms then eliminate location candidates that do not satisfy this basic criterion. This is often an internal process in the very preliminary phases of the site search process.

#### *Operating Costs and Site Availability*

After locations with suitable workforce and industry characteristics are established, firms begin to evaluate their cost of doing business at each location. This is the stage in the location process that economic development recruiters refer to when they are “in the game”. Firms evaluate utility rates, standard wages, and tax structure,



among countless other factors. In this process firms begin to look for sites that fit their operating needs. Large industrial sites are unique, and no site is ever "perfect". It is in this stage that case study respondents indicated that having sites is essential to progressing to the next stage of the process. As put by Adrienne Cole, Director of Raleigh Economic Development, "This is a game of not being eliminated. Having a choice of suitable sites keeps you in the game longer, gets you to the next stage."

#### Incentives & Livability

At this stage, firms have narrowed their candidates down to a small list of potential locations, and most likely have potential sites identified. It is here where a location's ability to provide financial incentives as necessary can win the decision. Tools available to some jurisdictions usually range from property tax incentives to credits for high wage job creation, to discretionary funds.

According to our case study respondents, livability of a community comes into play in this stage again in an "all else equal" preference situation. Effectively, all communities that were initially "on the radar" have a generally high livability standard that, in conjunction with all other criteria, got them on the radar in the first place. Livability typically factors again at the end of the process, in instances where other business-related factors remain roughly equal, such that decision makers' preference for a particular community quality of life may "break the tie."

## INDIVIDUAL SUMMARIES

### AUSTIN, TEXAS

- The Economic Development Lead is the Chamber of Commerce. The Chamber manages the site inventory and does initial recruiting. The City gets involved when the Chamber has a recruiting target that is interested in the region. The City will partner with the State to put together incentive packages as necessary.
- Targeted Industries include: Clean energy, bio-tech, corporate headquarters, digital media, (video) gaming, and nanotech. The City's primary competitive advantage is workforce. The combination of the University of Texas and an existing high-tech semiconductor cluster is the source. Otherwise cost of business and livability are factors.
- Austin sees itself competing largely with Raleigh and the Tennessee Valley, although nearly every other respondent noted Austin as a major competitor.
- There is no mandate or strategy in Austin requiring or limiting site availability. Zoning limitations on land in Austin were the most relaxed in the survey.
- The region focuses on workforce and infrastructure investment. The region has the most diverse set of incentive tools in the case study.

#### Contact:

CITY OF AUSTIN, ECONOMIC GROWTH AND REDEVELOPMENT SERVICES OFFICE  
Brian Gildea, Director  
512-974.6381

AUSTIN CHAMBER OF COMMERCE  
Dave Porter, Senior Vice President of Economic Development  
512.322.5650



### ALBUQUERQUE, NEW MEXICO

- Industry recruitment efforts are driven by the private economic development corporation Albuquerque Economic Development. Public jurisdiction administrative restrictions on travel and other recruiting expenses indicate a private corporation approach to avoid such restrictions. The City gets involved in the process when putting together incentive plans and working with the state.
- Targeted Industries include: Film industry, renewable energy, and high-tech manufacturing. Their advantages are driven by the presence of National Laboratories in Los Alamos, Air Force, Department of Defense, and other federal research investments. The cluster has generated many private spin-offs and vendors related to government programs. Federal funding is a huge part of driving the cluster. They have three Science and Tech campuses. Otherwise they promote livability and favorable utility/tax rates relative to what they see as major market competitors in Phoenix and Denver. The New Mexico Governor even has a discretionary fund to strategically disburse targeted incentives.
- Albuquerque landed Schott Solar in 2008 which took required 80 acres.
- Albuquerque does not have a mandate or program for land inventory because land supply is ample. Much of the recruiting efforts are driven in the direction of two master planned sites, Mesa del Sol and SunCal.
- According to Albuquerque Economic Development Inc. having a diversity of sites is exceedingly important. They find that firms will begin shopping areas based on workforce criteria and operating costs, and then move into site characteristics. At this stage in site selection they find that having the diversity to shop multiple sites with different characteristics will "keep them in the game" as opposed to looking elsewhere with similar workforce, cost, and livability criteria.
- Albuquerque competes primarily with Austin, Salt Lake, Phoenix, and Oregon on high-tech.

#### Contact:

CITY OF ALBUQUERQUE, ECONOMIC DEVELOPMENT DEPARTMENT  
Chris Chavez, Business Development Manager  
505.768.3270

ALBUQUERQUE ECONOMIC DEVELOPMENT INC.  
Denis Houston, Director of Retention and Expansion  
505.821.8218  
Bob Walton, Vice President of Business Development  
505.246.6207

### RALEIGH, NORTH CAROLINA

- "Raleigh Economic Development" is a division of the Chamber of Commerce that partners with the local jurisdictions and Wake County. They are the economic development lead in the market in charge of recruiting. They are contracted through the city to allow for better use of private and public funding pools and for confidentiality. The City and State become involved in the later incentive process.
- Targeted Industries include: Photonics, IT communication equipment, advanced medical care, corporate headquarters, bio-tech, video gaming and entertainment, renewable energy, nonwoven textiles, defense, and aeronautical engineering.



- The Raleigh 2030 Plan adopted in 2009 outlines the need to resist the conversion of large employment sites into residential and other uses. It has targeted areas of growth and encourages the certification of sites through either the State or the County site certification programs. While the region has goals to encourage economic development in target industries, the land use system does not set mandates or requirements on the number of particular sites that need to be available. The availability of land in the region has allowed the market to supply multiple marketing options.
- The recruitment process for them begins when firms start with a large number of potential locations on the basis of workforce, livability, etc. and then start to look at operating cost advantages to narrow the list. After the list of geographies is narrowed down, site availability and characteristics are weighed. According to Raleigh, this is the critical point in the process where if site availability and selection is not available, recruitment potential is lost as firms keep moving through the candidates looking at incentives and comparing sites in other markets.
- Raleigh competes primarily with Austin, Tennessee Valley, Orlando, Charlotte, Richmond, and Atlanta but less so now than historically.

**Contact:**

RALEIGH ECONOMIC DEVELOPMENT  
Adrienne Cole, Director  
919.644.7049

**COLORADO SPRINGS, COLORADO**

- Economic Development is headed by the Colorado Springs Economic Development Corporation, a private non-profit contracted with the City. They cover a broad geographic area including the City of Pueblo. The city and state get involved in the incentive and development process.
- There are four primary industry targets in Colorado Springs: Aerospace/defense, IT and software, sports/health fitness/life sciences (includes medical devices), and renewable energy. They specifically target "primary employers" as defined by firms that export greater than 50% of their products or services.
- The catalyst for the community's workforce cluster is largely military and government-driven. Colorado Springs is proximate to many military bases and establishments, including NORAD. They have a number of local and state-level incentives at their disposal, including an enterprise zone and local performance-based funding based on job creation.
- However, they feel that they are not as competitive in incentives as New Mexico and Texas. Lower taxes are probably their biggest incentive. They are highly competitive for wind energy. Colorado Springs is preparing to make a major wind energy recruitment announcement.
- There is no regional policy that they are beholden to with respect to land inventory. The market adequately provides ample opportunities. For example, a number of years ago they were severely lacking adequate large sites with rail access and were losing some recruitment opportunities as a result. They went out into the market and started identifying sites and contacting land owners to meet that need. The process concluded with the assembly of a 500-acre subdividable parcel with strong location and rail service.



- Site marketability and options are essential. "You have to have the sites." It was noted that firms need to turn these sites around fast and moving dirt in six months. "The ability to offer a suitable site on a fast time frame is critical, without it you are not in the game."
- Land scarcity is not viewed to be an issue. They have an abundance of flat, prairie land to the east. They estimate they have the equivalent of roughly 35 50-to-100 acre sites, half of which are development ready/serviced. In addition, they have a number of large, vacant existing structures that they have found to be highly marketable for retrofits to renewable energy firms. Primarily, they have a vacated Intel Fab that can be delivered at a "fire sale" basis, which has gotten a lot of interest from solar firms recently.
- Primary markets they compete with are:
  - For high-tech and renewable energy, Albuquerque, Austin, Phoenix, and Oregon
  - For Corporate Headquarters, Denver, Austin, and Dallas
  - For Data Centers, Omaha, Kansas City, and San Antonio

**Contact:**

COLORADO SPRINGS ECONOMIC DEVELOPMENT CORP.  
Dave White, Vice President of Marketing  
719.471.8183 x2835

**SEATTLE, WASHINGTON**

- Enterprise Seattle is a private non-profit economic development corporation. They are the regional economic development council in charge of recruiting and economic development in Seattle/King County. They work with the City and County economic development groups to place firms and businesses and grow existing businesses and industries in the region.
- Primary Target Industries include: bio-tech, renewable energy, aerospace, computer software. However, they are recruiting more research-oriented firms and not necessarily manufacturers.
- There is no formal strategy in the management of large lot inventory. They actually focus very little of their efforts in recruiting outside industries. He estimates they concentrate 70% to 80% efforts on local business development. They work with commercial brokers to be aware of the inventory of sites available in the region.
- They perceive themselves as having serious disadvantage nationally because Washington has a constitutional mandate that limits ability to produce incentive packages for business recruitment. This has played into their "grow organically" strategy.
- The Seattle region has very few sites in the 50-100 acre range. Actually, a 50-100 acre site would be "near impossible." 20 to 30-acre sites are achievable in marketable numbers. They are not really competing for large industrial users because they do not have the sites. For Seattle it is not only site size limitation but cost as well. He says large manufacturing oriented users are not looking at Seattle because they could not find sites on a functional cost basis. They shop more rural locations with cheaper available land and more favorable utility rates. Hillsboro, Austin, and Albuquerque were specifically identified as such examples.
- Primary markets they compete with are:
  - For Bio-Tech: Chicago, Boston, New Jersey
  - For Renewable Energy: Austin, San Diego, San Francisco
  - Others: Portland, Las Vegas, Denver



**Contact:**

CITY OF SEATTLE, OFFICE OF ECONOMIC DEVELOPMENT  
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ENTERPRISE SEATTLE  
Steve Gerritson, Manager of Business Development  
206.389.8656



Memo

Date: May 17, 2010

To: Metro Policy Advisory Committee (MPAC)

From: Commission Chair Lynn Peterson, JPACT Clackamas County Representative  
Commissioner Charlotte Lehan, MPAC Clackamas County Representative  
Councilor Donna Jordan, MPAC Clackamas County Largest City Alternate  
Mayor Alice Norris, MPAC Clackamas County Second Largest City Representative  
Councilor Jody Carson, MPAC Clackamas County Other Cities Representative  
Mayor Tim Knapp, City of Wilsonville

RE: 2009 Urban Growth Report (UGR): Feedback on MPAC  
Employment Subcommittee Draft Recommendations

### **Is premise of large-lot industrial demand still accurate?**

In discussing the 2009 Urban Growth Report (UGR) and MPAC Employment Subcommittee Draft Recommendations with area elected officials, we continue to hear a commonly asked question that goes to the root underpinnings of the report: *Are the assumptions still valid that underlie the 2009 Urban Growth Report (UGR) that “identified demand for an additional 200 to 1,500 acres in large lot configurations...for traded-sector industrial uses”?*

We question this determination. The assumptions that the UGR is based upon were developed over two years ago and may be flawed; that is, the assumptions and base-line data were developed prior to the occurrence of the “Great Recession of 2008-10.”

The “Great Recession” has resulted in the three-county metro region losing over 50,000 jobs, or the equivalent of the past 10 years’ worth of job creation. This is a substantial loss in employment, and one that places our baseline of data back to the year 2000.

The “Great Recession” has produced a record-high vacancy amount of over 15.8 million square feet (SF) of industrial space in first quarter 2010; see CB Richard Ellis, “MarketView, Portland, OR – Industrial,” First Quarter 2010 report. Many sub-market areas in the Portland region are running with 25% to 44% or more vacancy rates, and these statistics do not include additional speculative industrial space now under development.

Based on the current, annual absorption rate of 267,328 SF, it will take the market 59 years to absorb this amount of vacant industrial space. Even assuming that the ‘gang-buster’ years of the better part of the 2000s occurred again with a 3.0 million SF annual absorption rate, it would take the market over five years to absorb all of this vacant industrial space. It is probably more realistic to assume that market conditions improve gradually over time, such that an annualized 1.0–1.5 million SF absorption rate occurs, which still implies over 10–15 years for the current vacant industrial space to be absorbed.

Taken together—extensive job losses and large amount of vacant industrial space—these major factors call into question projections for a near-term demand for 200-1,500 acres for large-lot industrial uses. We recommend that Metro recalculates the core assumptions and makes new determinations that take into account today’s reality rather than yesterday’s optimistic projections.

###

May 13, 2010

Council President David Bragdon &  
Members of the Metro Council  
600 NE Grand Ave.  
Portland, OR 97232-2736

Dear Chair Bragdon and Members of the Metro Council:

The Special Districts Association of Oregon (SDAO) represents over 900 special districts statewide, including those in the Metro area. We appreciate the opportunity to comment on the draft Title 11 rules that Metro, in cooperation with the area's local governments, are drafting. Our comments are based on draft 13 of the proposed rules.

First, we strongly support the language in 3.07.1110 sub-section C (6) which references the types of districts covered by ORS 195 as being parties to the urbanization process. We believe the types of districts listed under ORS 195.065(4) are the most affected by urbanization, and action by cities and counties. Requiring an urban services agreement prior to bringing urban reserves into the UGB will give clear guidance on future services provision to these areas and provide predictability to stakeholders.

Second, we have had concerns that the language in previous drafts had given too much deference to cities by allowing a "veto" of the regional plan by a city that did not cooperate. The new language in Section E, addresses this concern, and we support its inclusion. Metro needs to maintain the ability to still bring land into the Urban Growth Boundary without city "approval" while also ensuring that residents of that area continue to receive urban services.

Finally, SDAO wants to emphasize an important policy position that seems to be overlooked too often: Metro needs to continue to distinguish between *governance* and *service provision*. While SDAO supports having areas within the Urban Growth Boundary *governed by cities* we do not, however, believe that a city in many cases is the best or most efficient provider of all public services.

To illustrate this point, it makes no sense in the Metro region to have twenty or thirty special districts providing water, park, sewer or fire, it also makes no sense to have twenty cities providing those services.

We believe that these services can be best provided by regional agencies, as has been shown by the experience in region already with Tualatin Valley Fire and Rescue, Clackamas Fire District 1, Tualatin Hills Park and Recreation District and Clean Water Agency. Metro should be encouraging these types of regional service providers.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Baker', with a long horizontal line extending to the right.

Greg Baker  
Executive Director

Cc: MPAC  
Clackamas County Chair Lynn Peterson  
Multnomah County Chair Jeff Cogen  
Washington County Tom Brian

Materials following this page were distributed at the meeting.

**MEMORANDUM**

May 26, 2010

**Latest Version:**

**TO:** Metro Policy Advisory Committee (MPAC)

**FROM:** Chairman Tom Brian, Washington County Board of Commissioners  
Mayor Jerry Willey, City of Hillsboro, MPAC member  
Mayor Denny Doyle, City of Beaverton, MPAC member  
Mayor Craig Dirksen, City of Tigard  
Mayor Keith Mayes, City of Sherwood, MPAC member  
Mayor Bill Bash, City of Cornelius  
Mayor Lou Ogden, City of Tualatin  
Mayor Pete Truax, City of Forest Grove

**RE: MPAC Employment Subcommittee Draft Recommendations**

**Traded Sectors 20-year Land Need**

The attached table identifies actual 2007-2009 inquiries<sup>i</sup> from prospective new companies re: the availability of large industrial lots within Washington County for high tech-related and silicon solar manufacturing businesses. The list demonstrates a continuing strong demand – even during the 2008-2010 economic recession –for suitably-located large industrial lots (50 acres or more in size) relatively close to the existing companies like Intel, SolarWorld and Genentech and a large, skilled workforce, and for smaller industrial sites as well in our County.

The inquiries strongly suggest **that the Region needs to evaluate the 20-year land needs of the specific traded sector industry clusters in the region as distinct regional land need categories, apart from “general industrial” regional land need categories.** This land needs analysis approach is especially crucial in light of the following E.D. Hovee advice in 2008 to Metro:

*“Mid-Term (20 Year): For the 20-year time horizon, the region’s prospects are highly dependent on its current competitive position and decisions by major high-tech and Port related industries within the Portland metro area relative to other U.S. and global alternatives.*

*The opportunity for the region to attract new growth lies with the region’s existing industry clusters. . . . The ability of one company – such as Vesta or SolarWorld – to ‘anchor’ the region’s sustainability industry cluster could pave the way for spinoff industries.*

*Other opportunities include building off the region’s other industry groupings, including established and emerging industries such as apparel, metals, high-tech, biosciences, and others.. . . .”<sup>ii</sup> (emphasis added)*

The MPAC Employment Subcommittee Recommendations specifically address *large industrial sites for traded sectors companies* that typically are site “end users”. In contrast, a May 12 memorandum to MPAC discusses something entirely different – the speculative, for-lease industrial market for *tenant-*

*occupied industrial buildings*, in a range of typically smaller sizes. **The two are not the same industrial land use and are not substitutes for one another.** Hopefully, this memorandum and the May 12 memorandum will be rigorously examined by MPAC at its May 26 meeting.

Large, regional employers have a track record in the metro area for constructing large, specialized, consolidated facilities on their own land rather than leasing many buildings that oftentimes are not financially feasible to adapt to the unique, high-tech usage, specialized infrastructure, and security needs of the firm. It is true, however, that large traded-sector firms create commerce for smaller businesses that in turn need speculative industrial space.

Today, the regional industrial market is faring better than indicated in the May 12 memorandum according to CoStar Property, the commercial real estate industry's most comprehensive source of market data.<sup>iii</sup> Regional space vacancy is presently at 8.9%, including all types, qualities, and ages of speculative industrial space. The market is now performing better than it did as far back as 2004 when the regional vacancy rate was over 11.1% and vacant space totaled nearly 20 million square feet – and it took less than three years for half of that to fill up according to CoStar.

Despite the troubles the regional economy has had over the past few years, it is clear that our traded sector industries, particularly high-tech, (as forecasted by E.D. Hovee) are leading the Region's recovery from the recession. *The Oregonian* recently reported the following good news about the region's key high-tech clusters:

- Intel, SolarWorld, Genentech, and Kaiser Permanente are currently expanding by an estimated, combined private investment nearly \$3 billion.
- “Silicon Forest” tech manufacturers recently enjoyed a 58% jump in semiconductor sales. Intel plans to respond by hiring 1,000 people worldwide – including in Oregon - by the end of 2010.
- The same article reported that ON Semiconductor will be investing \$7 million at its existing Gresham plant and adding 40 new employees, while a new “fab” or fabrication plant will be built in Clark County, Washington, helping to growth the industry elsewhere in the east part of the region.
- Oregon' exports to China in the first quarter of 2010, led by metro area high-tech, reached a record quarterly total of \$1.18 billion.

See. [http://blog.oregonlive.com/siliconforest/2010/05/ww\\_zz\\_silicon\\_forest\\_week\\_in\\_r.html](http://blog.oregonlive.com/siliconforest/2010/05/ww_zz_silicon_forest_week_in_r.html)

Attachment:

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<sup>i</sup> Many of these site availability inquiries were first made at the Oregon Business Development Department (OBD) which usually informs site selectors of available sites throughout the Region and Oregon.

<sup>ii</sup> Excerpt from E.D. Hovee draft Memo to Metro: “Task 2 Variables Affecting (Industry) Location Decisions, December, 2008.

<sup>iii</sup> The CoStar Industrial Report, First Quarter 2010. CoStar was Metro's consultant in the Employment UGR preparation.

**Hillsboro Industrial Siting Prospects 3  
Years (2007-2009)**

<b>PROJECT</b>	<b>LEAST ACRES</b>	<b>MOST ACRES</b>
Sonnershien	450	800
Apricus	250	300
Tahoe	80	150
Parkway II	75	200
Hot	75	75
Parkway	65	75
Million	65	75
Sunbelt	50	75
Bright	50	75
August	50	100
Boss	50	60
Bee	40	50
Bright	40	50
Valencia	40	50
Monarch	40	50
DT/Apollo	35	40
MIT	30	40
Reddy	26	40
Harvester	25	25
GM	20	25
David II	20	50
Overview	20	30
SpectraWatt	20	25
Jade	20	50
Innovate	15	25
Ark	15	20
Cell	10	25
Cambridge	10	20
SAV	10	20
Champion	10	15
MS	10	20
Wick	8	10
Edison	8	25
Ferro	5	10

**Hillsboro Industrial Site Recruitments Over 3 Years**

	<b>Least Acres</b>	<b>Max. Acres</b>	<b>Percent</b>
100+ Acres	2	5	15% *
50-99 Acres	9	12	35% *
25-49 Acres	8	10	29%
< 25 Acres	15	7	21%
Total Sites	34	34	100%

\*50% of total site inquiries for parcels over 50 acres in size

Source: City of Hillsboro Ec. Dev. Dept.  
December 2009



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May 25, 2010

The Hon. Shane Bemis, Chair  
Metro Policy Advisory Committee  
600 NE Grand Avenue  
Portland, OR 97232

**Subject: Response to May 12, 2010 Memo on 2009 Urban Growth Report (UGR)  
Feedback on MOAC Employment Subcommittee Draft Recommendations**

Dear Chair Bemis and Committee Members:

I am the Director of Governmental Affairs for the Society of Industrial and Office Realtors (SIOR). We are members of a global commercial real estate brokerage organization for which only the most experienced and productive real estate brokers can qualify. Currently, there are about 30 of probably 500 or so commercial real estate brokers that qualify for the SIOR designation in the Portland area.

This letter is on behalf of the Oregon Chapter of SIOR in response to the subject Memo from representatives of Clackamas County. My organization responds because we are acutely aware, and experience daily the effects of not having enough developable land to properly support either the expansion of local businesses nor the influx of new businesses.

The Memo addresses current net absorption rates for what are mostly speculative, leased multi-tenant industrial parks. It identifies that due to the Great Recession, the current net absorption is down, and with the resultant lower net absorption rate, there should not be a need for additional speculative, leased multi-tenant industrial parks for a long time.

This logic could certainly make sense if we want to stay in the Great Recession. Actually, per the attached graphic which references the CoStar data base, the net absorption for 2009 was almost -3M SF, which means that at the end of 2009 the illogical thing to do would have been to plan on converting 3M SF of industrial space into other uses every year thereafter. But this is not the foresight that we need if we want to come out of the Great Recession, especially since there is very little connection between the CoStar speculative leased vacancy rate and the kind of jobs that the Portland Metropolitan Area (PMA) is looking for.

The vacancy rate for speculative, leased multi-tenant industrial parks is often used as a barometer of the local industrial economy. As a general barometer, it works quite well. However, it is not the barometer that measures the kind of Economic Development opportunity and the quality jobs that the PMA is looking for. Businesses tend to make real estate lease/own decisions depending upon their investment in capital equipment. If you have very little invested in capital equipment (warehousing, call centers, light assembly), then you will probably lease space. If you have a heavy investment in capital equipment and the facility infrastructure to support it, you cannot afford to have a landlord decide if your lease is



going to be renewed, so those businesses typically own their real estate. Even if large leased space availabilities were an indication of the PMA's ability to support or attract companies with well paying jobs, per the attached CBRE table there are only three alternatives available (2, 6, 15) that represent concrete tilt-up buildings with a minimum 25 foot clear height, which is what current businesses are looking for.

The kind of businesses that the region is looking for are the capital intensive companies. They are the companies that provide the best family wage jobs. And, those are the companies that almost invariably own their real estate. Genentech and SolarWorld are the best two recent examples. Although SolarWorld was fortunate enough to find a heavily capitalized vacant building for pennies on the dollar (resulting from Komatsu leaving which we don't want repeated), they both have invested heavily in custom built facilities to meet their needs, which never could have been provided for in speculative, leased multi-tenant industrial parks.

So, if we are going to ever get out of the Great Recession, with good family wage jobs, we need to look at the ability of existing and new companies to purchase land to build the custom buildings designed specifically to support their capital intensive, technological manufacturing processes. These businesses need land to accomplish this.

The topic of discussion monthly at our SIOR meetings is the lack of quality industrial land that is ready to develop. Our members are confronted daily with the challenges of trying to either help local companies expand, or represent companies considering Portland that are searching on a national or global level. All too often, companies evaluate the Portland marketplace and can't find the property that they are looking for, so they decide to focus their search on other marketplaces.

The region has recently undergone a major evaluation of rural and urban reserves. When looking at the results of the process, most SIOR's believe that there should be more urban reserves. However, we will stand behind the results and support their implementation. But we will not stand behind a reduction in urban reserves, especially on such flawed assumptions.

Respectfully,  
Capacity Commercial Group



Mark S. Childs, SIOR  
Senior Vice President  
SIOR Government Liaison

C: Jeff Sholian, SIOR, Pacific Real Estate Partners, President Oregon Chapter  
Mike Wells, SIOR, CRESA Partners  
Paul Breuer, SIOR, Colliers International  
Tony Reser, SIOR, GVA Kidder Mathews

## 1Q2010 Portland Industrial 150,000+ SF Contiguous Spaces

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site: [acres]	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & TIs For Sale: [Amount] ([\$/sf])	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
1 89 S Timm Rd 89 S Timm Rd Ridgefield, WA 98642 Complex:	Whse/Distribution Existing Metal	190,294 SF Site: 16.83 acres	190,294 SF 190,294 SF 190,294 SF	\$0.55 - \$0.60 NNN BLN NNN: TIs: For Sale: \$8,900,000 (\$46.77/sf)	20 FT 32.5 FT Yes	Grnd: 6 Dock: 18 No Rail	
<b>Administrative Info:</b> Property ID: 100021148 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 02/03/2010 Date Verified: 03/25/2010 Listing No.:							
2 Cascade Dist Center 20016 - 20078 NE Sandy Blvd Gresham, OR 97230 Complex:	Whse/Distribution Existing Concrete Tilt-up	303,050 SF Site: 14 acres	152,435 SF 152,435 SF 152,435 SF	\$0.39 - \$0.39 NNN \$.75/sf NNN: \$0.10/sf TIs: For Sale: No	3000A 277/480V 3P Yes	30 FT 30 FT Yes	Grnd: 1 Dock: 27 No Rail
<b>Administrative Info:</b> Property ID: 100021178 Vacancy Rate: 50.3% Vacancy Index: Industrial Date Updated: 09/23/2009 Date Verified: 03/29/2010 Listing No.:							
3 2455 NW Nicolai 2455 NW Nicolai St Portland, OR 97210-1812 Complex:	Whse/Distribution Existing Concrete Tilt-up	235,818 SF Site: 7.8 acres	154,690 SF 154,690 SF 154,690 SF	\$0.35 - \$0.35 NNN \$.75/sf NNN: \$0.09/sf TIs: For Sale: No	225A 277/480V 3P Yes	24 FT 26 FT Yes	Grnd: No Dock: 44 Yes Rail
<b>Administrative Info:</b> Property ID: 110003726 Vacancy Rate: 65.6% Vacancy Index: Industrial Date Updated: 09/21/2009 Date Verified: 03/29/2010 Listing No.:							
4 Consolidated Metco 13940 N Rivergate Blvd Portland, OR 97203-6565 Complex:	Manufacturing Existing Other	172,400 SF 21,000 SF Site: 20 acres	172,400 SF 172,400 SF 172,400 SF 172,400 SF	TBD NNN: TIs: For Sale: \$9,500,000 (\$55.10/sf)	18 FT 277/480V Yard	36 FT 20 FT Yard	Grnd: Yes Dock: Yes Possible Yes Crane
<b>Administrative Info:</b> Property ID: 110002331 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 03/31/2010 Date Verified: 03/29/2010 Listing No.:							
5 Linnton Plywood 10504 NW St Helens Rd Portland, OR 97231-1049 Complex:	Manufacturing Existing Other	210,000 SF Site: 24.74 acres	210,000 SF 210,000 SF 210,000 SF 210,000 SF	TBD NNN: TIs: For Sale: \$8,082,558 (\$38.49/sf)	36 FT 36 FT Yard	Grnd: Yes Dock: Yes Yes Rail	
<b>Administrative Info:</b> Property ID: 110002880 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 09/21/2009 Date Verified: 03/29/2010 Listing No.:							

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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site: [acres]	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & Tls For Sale: [No]	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
6 Bldg 1 6308 N Marine Dr Portland, OR 97217 Complex: Marine Dr Dist I	Whse/Distribution Existing Concrete Tilt-up	225,250 SF  Site: 12.9 acres	225,250 SF 106,000 SF 225,250 SF 0 SF	\$0.35 - \$0.35 NNN \$.70/sf NNN: \$0.09/sf Tls: For Sale: No	  277/480V 3P	26 FT 26 FT ESFR	Grnd: 3 Dock: 46 Yes Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110001420	<b>Vacancy Rate:</b> 0%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 11/25/2009	<b>Date Verified:</b> 05/19/2010	<b>Listing No.:</b>	
7 Panel Equipment Sales 6803 SE Johnson Creek Blvd Portland, OR 97206-9457 Complex:	Manufacturing Existing Wood Frame	168,160 SF  Site: 10.68 acres	168,000 SF 30,000 SF 168,000 SF 168,000 SF	TBD  NNN: Tls: For Sale: \$5,950,000 (\$35.38/sf)	  480V 3P	20 FT 26 FT Dry Yard	Grnd: 9 Dock: 1 No Rail Yes Crane
<b>Administrative Info:</b>	<b>Property ID:</b> 110003166	<b>Vacancy Rate:</b> 99.9%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 09/23/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
8 Wilhelm Whse #3 2400 SE Mailwell Dr Milwaukie, OR 97222-7328 Complex:	Whse/Distribution Existing Concrete Tilt-up	280,122 SF  Site: 7.85 acres	280,122 SF 70,000 SF 210,122 SF 210,122 SF	\$0.25 - \$0.30 NNN  NNN: \$0.05/sf Tls: For Sale: \$7,000,000 (\$24.99/sf)	    	18 FT 20 FT Yes	Grnd: 1 Dock: 27 Yes Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110003743	<b>Vacancy Rate:</b> 75.0%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 12/29/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
9 Bldg A 11241 SE Hwy 212 Clackamas, OR 97015 Complex: 212 Corporate Ctr	Whse/Distribution Existing Concrete Tilt-up	164,824 SF  Site: 12 acres	164,824 SF 80,000 SF 164,824 SF 164,824 SF	\$0.35 - \$0.35 NNN \$.70/sf NNN: \$0.09/sf Tls: For Sale: No	4000A 480V 3P	24 FT 26 FT Yes Yard	Grnd: 10 Dock: 16 No Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110001397	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 01/12/2010	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
10 BMC West 20285 SW Cipole Rd Sherwood, OR 97140 Complex:	Whse/Distribution Existing Concrete Tilt-up	157,100 SF 31,100 SF Site: 18.86 acres	157,100 SF 37,500 SF 157,100 SF 157,100 SF	  NNN: Tls: For Sale: \$12,500,000 (\$79.57/sf)	   3P	16 FT 26 FT Wet Yard	Grnd: 13 Dock: 8 Possible
<b>Administrative Info:</b>	<b>Property ID:</b> 100046416	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 09/23/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
11 G.M. Service Parts 15005 SW Tualatin Valley Hwy Beaverton, OR 97005-0000 Complex:	Whse/Distribution Existing Concrete Tilt-up	199,911 SF  Site: 16.52 acres	199,911 SF 199,911 SF 199,911 SF 199,911 SF	\$0.28 - \$0.28 NNN \$.80/sf NNN: Tls: For Sale: \$8,850,000 (\$44.27/sf)	2600A 460V 3P	18 FT 20 FT Yes Yard	Grnd: No Dock: 17 Yes Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110002585	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 09/23/2009	<b>Date Verified:</b> 03/30/2010	<b>Listing No.:</b>	

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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name	Prop/Dev Type	Building Size	Total Available	Lease Rate	Amps	Min Clear Ht	Loading
Address	Status	Office SF	Min Available	Office Surcharge	Volts	Max Clear Ht	
	Construction		Max Contiguous	NNN & TIs	Phase	Sprinkler	Rail
			Total Vacant			Yard Space	Crane
12 Hollywood Video 25600 SW Parkway Center Dr Wilsonville, OR 97070-9606 <b>Complex:</b>	Whse/Distribution Existing Concrete Tilt-up	177,580 SF  <b>Site:</b> 10.37 acres	177,580 SF 177,580 SF 177,580 SF 0 SF	TBD (Lease Type: NNN) \$.60/sf NNN: TIs: For Sale: No	1200A 277/480V	24 FT 25 FT Yes	<b>Grnd:</b> 1 <b>Dock:</b> 36 No Rail
<b>Administrative Info: Property ID:</b> 110002706 <b>Vacancy Rate:</b> 0% <b>Vacancy Index:</b> Industrial <b>Date Updated:</b> 03/04/2009 <b>Date Verified:</b> 03/29/2010 <b>Listing No.:</b>							
13 Joe's Stores Warehouse 9805 SW Boeckman Rd Wilsonville, OR 97070-9242 <b>Complex:</b>	Whse/Distribution Existing Concrete Tilt-up	300,361 SF  <b>Site:</b> 14.09 acres	300,361 SF 127,000 SF 300,361 SF 300,361 SF	TBD  NNN: TIs: For Sale: No	3P	22 FT 30 FT Yes Yard	<b>Grnd:</b> No <b>Dock:</b> 54 Possible
<b>Administrative Info: Property ID:</b> 110002583 <b>Vacancy Rate:</b> 100% <b>Vacancy Index:</b> Industrial <b>Date Updated:</b> 03/29/2010 <b>Date Verified:</b> 03/29/2010 <b>Listing No.:</b>							
14 MasterBrand 600 SW Walnut St Hillsboro, OR 97123 <b>Complex:</b>	Whse/Distribution Existing Metal	241,770 SF 16,185 SF <b>Site:</b> 17.85 acres	241,770 SF 73,925 SF 167,845 SF 241,770 SF	TBD  NNN: TIs: For Sale: \$4,900,000 (\$20.27/sf)		12 FT 20 FT Yes Yard	<b>Grnd:</b> 8 <b>Dock:</b> 11 Possible
<b>Administrative Info: Property ID:</b> 110004172 <b>Vacancy Rate:</b> 100% <b>Vacancy Index:</b> Industrial <b>Date Updated:</b> 07/29/2009 <b>Date Verified:</b> 01/12/2010 <b>Listing No.:</b>							
15 Nike Distribution Center 27255 SW 95th Ave Wilsonville, OR 97070-0000 <b>Complex:</b>	Whse/Distribution Existing Concrete Tilt-up	508,277 SF  <b>Site:</b> 25.95 acres	399,277 SF 399,277 SF 399,277 SF 399,277 SF	TBD (Lease Type: NNN)  NNN: \$0.10/sf TIs: For Sale: No	3P	30 FT 30 FT	<b>Grnd:</b> 3 <b>Dock:</b> 45 No Rail
<b>Administrative Info: Property ID:</b> 110003028 <b>Vacancy Rate:</b> 78.6% <b>Vacancy Index:</b> Industrial <b>Date Updated:</b> 11/11/2009 <b>Date Verified:</b> 03/20/2010 <b>Listing No.:</b>							
16 Tektronix Bldg 58 2540 SW Karl Braun Dr Beaverton, OR 97077 <b>Complex:</b> Tek Bvtn Campus	R&D/Flex Existing Brick	195,441 SF  <b>Site:</b>	195,441 SF 195,441 SF 195,441 SF 195,441 SF	\$0.85 - \$0.85 NNN BLN NNN: TIs: For Sale: No			<b>Grnd:</b> No <b>Dock:</b> No No Rail
<b>Administrative Info: Property ID:</b> 100043635 <b>Vacancy Rate:</b> 100% <b>Vacancy Index:</b> Industrial <b>Date Updated:</b> 03/09/2009 <b>Date Verified:</b> 03/29/2010 <b>Listing No.:</b>							

**TOTAL**

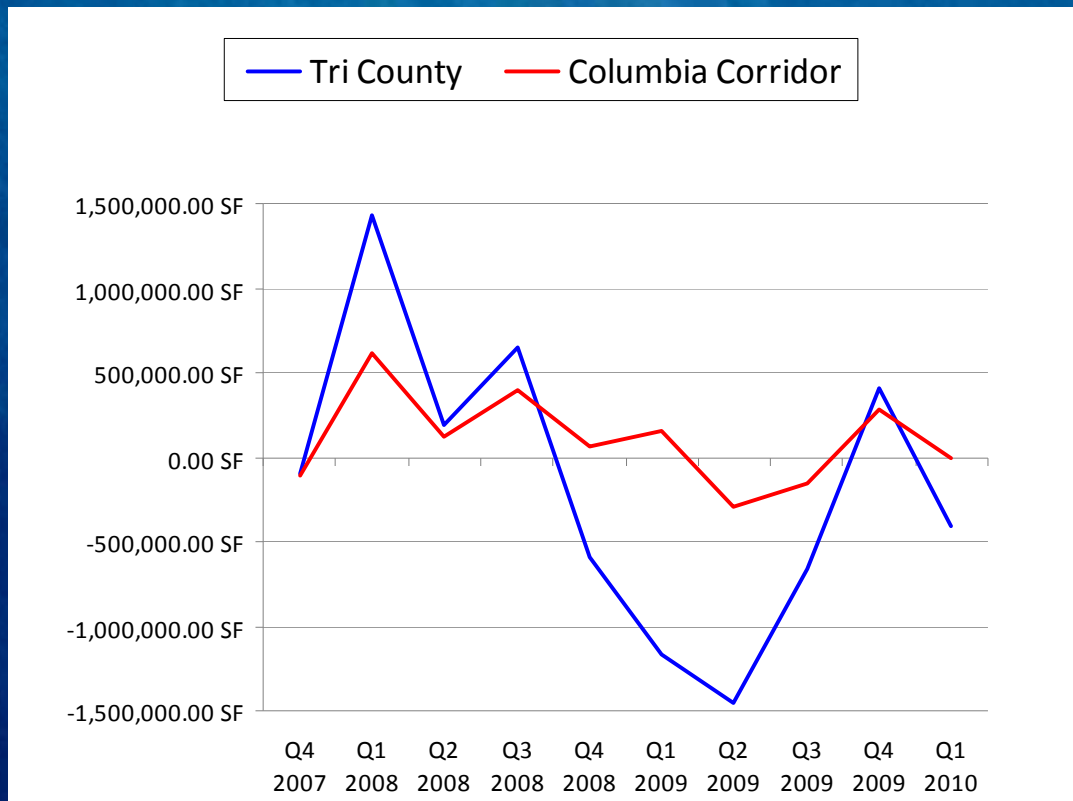
**Properties: 16**

**Building SF: 3,730,358**

**Available SF: 3,389,455**

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# Absorption Rates – Net Absorption



## Tri County

2007 – 4,514,750 SF  
 2008 – 1,671,226 SF  
 2009 - -2,867,468 SF  
 Q1 2010 - -502,183 SF

## Columbia Corridor

2007 – 1,291,112 SF  
 2008 – 1,195,673 SF  
 2009 – -3,618 SF  
 Q1 2010 - -28,602 SF



**Brian Owendoff**  
Managing Director

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Brokerage Services

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503 221 4873 Fax

brian.owendoff@cbre.com  
www.cbre.com

May 24, 2010

The Hon. Shane Bemis, Chair  
Metro Policy Advisory Committee  
600 NE Grand Avenue  
Portland, OR 97232

**RE: Response to May 12, 2010 Memo on 2009 Urban Growth Report (UGR)  
Feedback on MOAC Employment Subcommittee Draft Recommendations**

Dear Chair Bemis and Committee Members:

I am Managing Director of the CB Richard Ellis office in Portland, and have been involved in over \$1 billion of commercial development and leasing across all product types (office, warehouse retail and multifamily) over the past 18 years.

I am writing in response to the subject Memo dated May 12, 2010 that erroneously refers to CB Richard Ellis's first quarter 2010 industrial Market View report.

Those facts as represented in the memo are not correct. While we do have 15.8M SF of vacant industrial space as of 1Q2010, that is an 8.2% vacancy rate. No industrial submarket is more than 10.5% vacant, yet the memo erroneously states some submarkets at "25% to 44% vacancy". The memo also mentions that "*stats do not include speculative development currently under construction*"... that's because there is no speculative development due to the temporary lack of demand (key word is TEMPORARY).

The quote of 267,328 SF of net absorption per year as an average is incorrect. The industrial market has averaged 1.49M per year for the past 10 years and 1.79M for the past 5 years (includes Great Recession). A "gang-buster" year for Portland's industrial market is more than 4.7M SF of net absorption in 2006. The representation of 3M SF is off by more than 35%.

The MPAC Employment Subcommittee Recommendations specifically address large industrial sites for traded sectors companies that typically are site "end users." In contrast, the May 12 memorandum to MPAC discusses something entirely different –

the speculative, for-lease industrial market for tenant-occupied industrial buildings, in a range of typically smaller sizes. The two are not the same industrial land use and are not substitutes for one another (apples vs bowling balls).

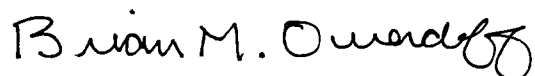
In order to fairly and accurately portray the large, speculative industrial market (as compared to the End User market), attached is a summary of the availability of blocks of continuous space of 150,000 square feet or larger in the Greater Portland industrial market.

Currently there are sixteen (16) buildings in Greater Portland (includes 1 property in Clark County) that can accommodate a user over 150,000 square feet. The large speculative absorption over the past ten years has averaged 654,105 SF per year (attached is a summary of current large blocks of industrial space and ten year overview of space and transaction 150,000 SF+). The current inventory of large block speculative space, assuming ten year averages, will be absorbed in the next 36-48 months. This will lead to new construction to accommodate need for newly created jobs in the region. Without an adequate land supply, Greater Portland simply will not be considered by companies looking to expand business into the Pacific Northwest.

On a regular basis, I work with large office and industrial users on site searches from a local, regional and national basis. Many times Greater Portland is eliminated early from consideration due to lack of immediately available office and warehouse space. Land is the raw material needed for construction of built environment to accommodate job creation. I disagree strongly with the Clackamas County representatives that Metro go back to core assumptions and make new determinations.

Contact me with questions.

Sincerely,



Brian M. Owendoff  
Managing Director  
CB Richard Ellis

Enclosures

Cc: Lynn Peterson, JPACT Clackamas County Representative  
Charlotte Lehan, MPAC Clackamas County Representative  
Jody Carson, MPAC Clackamas County Representative  
Mayor Tim Knapp, Mayor City of Wilsonville

GREATER PORTLAND, OR

DATA FIELD	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	AVG
TOTAL NET ABSORPTION	4,509,853	(1,116,059)	(388,644)	158,763	2,774,617	3,687,333	4,720,596	3,093,552	199,600	(2,729,442)	1,491,017
ABS FROM 150K USERS	160,000	575,599	615,075	1,648,462	1,219,550	508,225	333,000	777,250	301,665	402,228	654,105
# OF 150K TRANSACTIONS	1	3	2	4	3	2	2	4	2	2	3
150K CONTIGUOUS AVAILABLE	10	11	19	19	15	11	8	12	19	18	14

LEASE AND LOCATION	800.COM RIVERGATE	FORD RIVERGATE	DEAN FOODS KELLEY PT	NAUTILUS RIVERSIDE PKWY	LAIKA ENT UPG	GP MARINE DDC	COLGATE RIVERGATE	MOR FURN KELLEY POINT
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BTS OCCUPIER AND LOCATION	INTEL HILLSBORO	OR TRANSFER LEADBETTER	FEDEX TROUTDALE
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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site: [acres]	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & Tls	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
1 89 S Timm Rd 89 S Timm Rd Ridgefield, WA 98642 Complex:	Whse/Distribution Existing Metal	190,294 SF Site: 16.83 acres	190,294 SF 190,294 SF 190,294 SF 190,294 SF	\$0.55 - \$0.60 NNN BLN NNN: Tls: For Sale: \$8,900,000 (\$46.77/sf)		20 FT 32.5 FT Yes	Grnd: 6 Dock: 18 No Rail
<b>Administrative Info: Property ID: 100021148 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 02/03/2010 Date Verified: 03/25/2010 Listing No.:</b>							
2 Cascade Dist Center 20016 - 20078 NE Sandy Blvd Gresham, OR 97230 Complex:	Whse/Distribution Existing Concrete Tilt-up	303,050 SF Site: 14 acres	152,435 SF 152,435 SF 152,435 SF 152,435 SF	\$0.39 - \$0.39 NNN \$.75/sf NNN: \$0.10/sf Tls: For Sale: No	3000A 277/480V 3P	30 FT 30 FT Yes	Grnd: 1 Dock: 27 No Rail
<b>Administrative Info: Property ID: 100021178 Vacancy Rate: 50.3% Vacancy Index: Industrial Date Updated: 09/23/2009 Date Verified: 03/29/2010 Listing No.:</b>							
3 2455 NW Nicolai 2455 NW Nicolai St Portland, OR 97210-1812 Complex:	Whse/Distribution Existing Concrete Tilt-up	235,818 SF Site: 7.8 acres	154,690 SF 154,690 SF 154,690 SF 154,690 SF	\$0.35 - \$0.35 NNN \$.75/sf NNN: \$0.09/sf Tls: For Sale: No	225A 277/480V 3P	24 FT 26 FT Yes	Grnd: No Dock: 44 Yes Rail
<b>Administrative Info: Property ID: 110003726 Vacancy Rate: 65.6% Vacancy Index: Industrial Date Updated: 09/21/2009 Date Verified: 03/29/2010 Listing No.:</b>							
4 Consolidated Metco 13940 N Rivergate Blvd Portland, OR 97203-6565 Complex:	Manufacturing Existing Other	172,400 SF 21,000 SF Site: 20 acres	172,400 SF 172,400 SF 172,400 SF 172,400 SF			18 FT 20 FT Yard	Grnd: Yes Dock: Yes Possible Yes Crane
<b>Administrative Info: Property ID: 110002331 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 03/31/2010 Date Verified: 03/29/2010 Listing No.:</b>							
5 Linnton Plywood 10504 NW St Helens Rd Portland, OR 97231-1049 Complex:	Manufacturing Existing Other	210,000 SF Site: 24.74 acres	210,000 SF 210,000 SF 210,000 SF 210,000 SF	TBD NNN: Tls: For Sale: \$8,082,558 (\$38.49/sf)		36 FT 36 FT Yard	Grnd: Yes Dock: Yes Yes Rail
<b>Administrative Info: Property ID: 110002880 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 09/21/2009 Date Verified: 03/29/2010 Listing No.:</b>							

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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & Tls For Sale: No	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
6 Bldg 1 6308 N Marine Dr Portland, OR 97217 Complex: Marine Dr Dist I	Whse/Distribution Existing Concrete Tilt-up	225,250 SF Site: 12.9 acres	225,250 SF 106,000 SF 225,250 SF 0 SF	\$0.35 - \$0.35 NNN \$.70/sf NNN: \$0.09/sf Tls: For Sale: No	277/480V 3P	26 FT 26 FT ESFR	Grnd: 3 Dock: 46 Yes Rail
<b>Administrative Info: Property ID: 110001420 Vacancy Rate: 0% Vacancy Index: Industrial Date Updated: 11/25/2009 Date Verified: 05/19/2010 Listing No.:</b>							
7 Panel Equipment Sales 6803 SE Johnson Creek Blvd Portland, OR 97206-9457 Complex:	Manufacturing Existing Wood Frame	168,160 SF Site: 10.68 acres	168,000 SF 30,000 SF 168,000 SF 168,000 SF	TBD NNN: Tls: For Sale: \$5,950,000 (\$35.38/sf)	480V 3P	20 FT 26 FT Dry Yard	Grnd: 9 Dock: 1 No Rail Yes Crane
<b>Administrative Info: Property ID: 110003166 Vacancy Rate: 99.9% Vacancy Index: Industrial Date Updated: 09/23/2009 Date Verified: 03/29/2010 Listing No.:</b>							
8 Wilhelm Whse #3 2400 SE Mailwell Dr Milwaukie, OR 97222-7328 Complex:	Whse/Distribution Existing Concrete Tilt-up	280,122 SF Site: 7.85 acres	280,122 SF 70,000 SF 210,122 SF 210,122 SF	\$0.25 - \$0.30 NNN NNN: \$0.05/sf Tls: For Sale: \$7,000,000 (\$24.99/sf)		18 FT 20 FT Yes	Grnd: 1 Dock: 27 Yes Rail
<b>Administrative Info: Property ID: 110003743 Vacancy Rate: 75.0% Vacancy Index: Industrial Date Updated: 12/29/2009 Date Verified: 03/29/2010 Listing No.:</b>							
9 Bldg A 11241 SE Hwy 212 Clackamas, OR 97015 Complex: 212 Corporate Ctr	Whse/Distribution Existing Concrete Tilt-up	164,824 SF Site: 12 acres	164,824 SF 80,000 SF 164,824 SF 164,824 SF	\$0.35 - \$0.35 NNN \$.70/sf NNN: \$0.09/sf Tls: For Sale: No	4000A 480V 3P	24 FT 26 FT Yes Yard	Grnd: 10 Dock: 16 No Rail
<b>Administrative Info: Property ID: 110001397 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 01/12/2010 Date Verified: 03/29/2010 Listing No.:</b>							
10 BMC West 20285 SW Cipole Rd Sherwood, OR 97140 Complex:	Whse/Distribution Existing Concrete Tilt-up	157,100 SF Site: 18.86 acres	157,100 SF 37,500 SF 157,100 SF 157,100 SF	NNN: Tls: For Sale: \$12,500,000 (\$79.57/sf)	3P	16 FT 26 FT Wet Yard	Grnd: 13 Dock: 8 Possible
<b>Administrative Info: Property ID: 100046416 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 09/23/2009 Date Verified: 03/29/2010 Listing No.:</b>							
11 G.M. Service Parts 15005 SW Tualatin Valley Hwy Beaverton, OR 97005-0000 Complex:	Whse/Distribution Existing Concrete Tilt-up	199,911 SF Site: 16.52 acres	199,911 SF 199,911 SF 199,911 SF 199,911 SF	\$0.28 - \$0.28 NNN \$.80/sf NNN: Tls: For Sale: \$8,850,000 (\$44.27/sf)	2600A 460V 3P	18 FT 20 FT Yes Yard	Grnd: No Dock: 17 Yes Rail
<b>Administrative Info: Property ID: 110002585 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 09/23/2009 Date Verified: 03/30/2010 Listing No.:</b>							

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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & Tls For Sale: No	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
12 Hollywood Video 25600 SW Parkway Center Dr Wilsonville, OR 97070-9606 Complex:	Whse/Distribution Existing Concrete Tilt-up	177,580 SF Site: 10.37 acres	177,580 SF 177,580 SF 0 SF	TBD (Lease Type: NNN) \$.60/sf NNN: Tls: For Sale: No	1200A 277/480V	24 FT 25 FT Yes	Grnd: 1 Dock: 36 No Rail
<b>Administrative Info: Property ID: 110002706 Vacancy Rate: 0% Vacancy Index: Industrial Date Updated: 03/04/2009 Date Verified: 03/29/2010 Listing No.:</b>							
13 Joe's Stores Warehouse 9805 SW Boeckman Rd Wilsonville, OR 97070-9242 Complex:	Whse/Distribution Existing Concrete Tilt-up	300,361 SF Site: 14.09 acres	300,361 SF 127,000 SF 300,361 SF 300,361 SF	TBD NNN: Tls: For Sale: No	3P	22 FT 30 FT Yes Yard	Grnd: No Dock: 54 Possible
<b>Administrative Info: Property ID: 110002583 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 03/29/2010 Date Verified: 03/29/2010 Listing No.:</b>							
14 MasterBrand 600 SW Walnut St Hillsboro, OR 97123 Complex:	Whse/Distribution Existing Metal	241,770 SF 16,185 SF Site: 17.85 acres	241,770 SF 73,925 SF 167,845 SF 241,770 SF	TBD NNN: Tls: For Sale: \$4,900,000 (\$20.27/sf)		12 FT 20 FT Yes Yard	Grnd: 8 Dock: 11 Possible
<b>Administrative Info: Property ID: 110004172 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 07/29/2009 Date Verified: 01/12/2010 Listing No.:</b>							
15 Nike Distribution Center 27255 SW 95th Ave Wilsonville, OR 97070-0000 Complex:	Whse/Distribution Existing Concrete Tilt-up	508,277 SF Site: 25.95 acres	399,277 SF 399,277 SF 399,277 SF 399,277 SF	TBD (Lease Type: NNN) NNN: \$0.10/sf Tls: For Sale: No	3P	30 FT 30 FT	Grnd: 3 Dock: 45 No Rail
<b>Administrative Info: Property ID: 110003028 Vacancy Rate: 78.6% Vacancy Index: Industrial Date Updated: 11/11/2009 Date Verified: 03/20/2010 Listing No.:</b>							
16 Tektronix Bldg 58 2540 SW Karl Braun Dr Beaverton, OR 97077 Complex: Tek Bvtn Campus	R&D/Flex Existing Brick	195,441 SF Site:	195,441 SF 195,441 SF 195,441 SF 195,441 SF	\$0.85 - \$0.85 NNN BLN NNN: Tls: For Sale: No			Grnd: No Dock: No No Rail
<b>Administrative Info: Property ID: 100043635 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 03/09/2009 Date Verified: 03/29/2010 Listing No.:</b>							

**TOTAL Properties: 16 Building SF: 3,730,368 Available SF: 3,389,455**

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## 1Q2010 Portland Industrial 150,000+ SF Contiguous Spaces

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site: [acres]	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & TIs For Sale: [Amount] ([\$/sf])	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
1 89 S Timm Rd 89 S Timm Rd Ridgefield, WA 98642 Complex: Administrative Info: Property ID: 100021148 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 02/03/2010 Date Verified: 03/25/2010 Listing No.:	Whse/Distribution Existing Metal	190,294 SF 190,294 SF 190,294 SF 190,294 SF	190,294 SF 190,294 SF 190,294 SF 190,294 SF	\$0.55 - \$0.60 NNN BLN NNN: TIs: For Sale: \$8,900,000 (\$46.77/sf)	20 FT 32.5 FT Yes	Grnd: 6 Dock: 18 No Rail	
2 Cascade Dist Center 20016 - 20078 NE Sandy Blvd Gresham, OR 97230 Complex: Administrative Info: Property ID: 100021178 Vacancy Rate: 50.3% Vacancy Index: Industrial Date Updated: 09/23/2009 Date Verified: 03/29/2010 Listing No.:	Whse/Distribution Existing Concrete Tilt-up	303,050 SF 152,435 SF 152,435 SF 152,435 SF	152,435 SF 152,435 SF 152,435 SF 152,435 SF	\$0.39 - \$0.39 NNN \$.75/sf NNN: \$0.10/sf TIs: For Sale: No	3000A 277/480V 3P Yes	30 FT 30 FT Yes No Rail	
3 2455 NW Nicolai 2455 NW Nicolai St Portland, OR 97210-1812 Complex: Administrative Info: Property ID: 110003726 Vacancy Rate: 65.6% Vacancy Index: Industrial Date Updated: 09/21/2009 Date Verified: 03/29/2010 Listing No.:	Whse/Distribution Existing Concrete Tilt-up	235,818 SF 154,690 SF 154,690 SF 154,690 SF	154,690 SF 154,690 SF 154,690 SF 154,690 SF	\$0.35 - \$0.35 NNN \$.75/sf NNN: \$0.09/sf TIs: For Sale: No	225A 277/480V 3P Yes	24 FT 26 FT Yes No Rail	
4 Consolidated Metco 13940 N Rivergate Blvd Portland, OR 97203-6565 Complex: Administrative Info: Property ID: 110002331 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 03/31/2010 Date Verified: 03/29/2010 Listing No.:	Manufacturing Existing Other	172,400 SF 21,000 SF 172,400 SF 172,400 SF	172,400 SF 172,400 SF 172,400 SF 172,400 SF	NNN: TIs: For Sale: \$9,500,000 (\$55.10/sf)	18 FT 277/480V 20 FT Yard	Grnd: Yes Dock: Yes Possible Yes Crane	
5 Linnton Plywood 10504 NW St Helens Rd Portland, OR 97231-1049 Complex: Administrative Info: Property ID: 110002880 Vacancy Rate: 100% Vacancy Index: Industrial Date Updated: 09/21/2009 Date Verified: 03/29/2010 Listing No.:	Manufacturing Existing Other	210,000 SF 210,000 SF 210,000 SF 210,000 SF	210,000 SF 210,000 SF 210,000 SF 210,000 SF	TBD NNN: TIs: For Sale: \$8,082,558 (\$38.49/sf)	36 FT 36 FT Yard	Grnd: Yes Dock: Yes Yes Rail	

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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site: [acres]	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & Tls For Sale: No	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
6 Bldg 1 6308 N Marine Dr Portland, OR 97217 Complex: Marine Dr Dist I	Whse/Distribution Existing Concrete Tilt-up	225,250 SF  Site: 12.9 acres	225,250 SF 106,000 SF 225,250 SF 0 SF	\$0.35 - \$0.35 NNN \$.70/sf NNN: \$0.09/sf Tls: For Sale: No	 277/480V 3P	26 FT 26 FT ESFR	Grnd: 3 Dock: 46 Yes Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110001420	<b>Vacancy Rate:</b> 0%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 11/25/2009	<b>Date Verified:</b> 05/19/2010	<b>Listing No.:</b>	
7 Panel Equipment Sales 6803 SE Johnson Creek Blvd Portland, OR 97206-9457 Complex:	Manufacturing Existing Wood Frame	168,160 SF  Site: 10.68 acres	168,000 SF 30,000 SF 168,000 SF 168,000 SF	TBD  NNN: Tls: For Sale: \$5,950,000 (\$35.38/sf)	 480V 3P	20 FT 26 FT Dry Yard	Grnd: 9 Dock: 1 No Rail Yes Crane
<b>Administrative Info:</b>	<b>Property ID:</b> 110003166	<b>Vacancy Rate:</b> 99.9%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 09/23/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
8 Wilhelm Whse #3 2400 SE Mailwell Dr Milwaukie, OR 97222-7328 Complex:	Whse/Distribution Existing Concrete Tilt-up	280,122 SF  Site: 7.85 acres	280,122 SF 70,000 SF 210,122 SF 210,122 SF	\$0.25 - \$0.30 NNN  NNN: \$0.05/sf Tls: For Sale: \$7,000,000 (\$24.99/sf)		18 FT 20 FT Yes	Grnd: 1 Dock: 27 Yes Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110003743	<b>Vacancy Rate:</b> 75.0%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 12/29/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
9 Bldg A 11241 SE Hwy 212 Clackamas, OR 97015 Complex: 212 Corporate Ctr	Whse/Distribution Existing Concrete Tilt-up	164,824 SF  Site: 12 acres	164,824 SF 80,000 SF 164,824 SF 164,824 SF	\$0.35 - \$0.35 NNN \$.70/sf NNN: \$0.09/sf Tls: For Sale: No	4000A 480V 3P	24 FT 26 FT Yes Yard	Grnd: 10 Dock: 16 No Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110001397	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 01/12/2010	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
10 BMC West 20285 SW Cipole Rd Sherwood, OR 97140 Complex:	Whse/Distribution Existing Concrete Tilt-up	157,100 SF 31,100 SF Site: 18.86 acres	157,100 SF 37,500 SF 157,100 SF 157,100 SF	  NNN: Tls: For Sale: \$12,500,000 (\$79.57/sf)	  3P	16 FT 26 FT Wet Yard	Grnd: 13 Dock: 8 Possible
<b>Administrative Info:</b>	<b>Property ID:</b> 100046416	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 09/23/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
11 G.M. Service Parts 15005 SW Tualatin Valley Hwy Beaverton, OR 97005-0000 Complex:	Whse/Distribution Existing Concrete Tilt-up	199,911 SF  Site: 16.52 acres	199,911 SF 199,911 SF 199,911 SF 199,911 SF	\$0.28 - \$0.28 NNN \$.80/sf NNN: Tls: For Sale: \$8,850,000 (\$44.27/sf)	2600A 460V 3P	18 FT 20 FT Yes Yard	Grnd: No Dock: 17 Yes Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110002585	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 09/23/2009	<b>Date Verified:</b> 03/30/2010	<b>Listing No.:</b>	

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**1Q2010 Portland Industrial  
150,000+ SF Contiguous Spaces**

Property Name Address	Prop/Dev Type Status Construction	Building Size Office SF Site	Total Available Min Available Max Contiguous Total Vacant	Lease Rate Office Surcharge NNN & TIs For Sale: No	Amps Volts Phase	Min Clear Ht Max Clear Ht Sprinkler Yard Space	Loading Rail Crane
12 Hollywood Video 25600 SW Parkway Center Dr Wilsonville, OR 97070-9606 Complex:	Whse/Distribution Existing Concrete Tilt-up	177,580 SF  Site: 10.37 acres	177,580 SF 177,580 SF 177,580 SF 0 SF	TBD (Lease Type: NNN) \$.60/sf NNN: TIs: For Sale: No	1200A 277/480V	24 FT 25 FT Yes	Grnd: 1 Dock: 36 No Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110002706	<b>Vacancy Rate:</b> 0%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 03/04/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
13 Joe's Stores Warehouse 9805 SW Boeckman Rd Wilsonville, OR 97070-9242 Complex:	Whse/Distribution Existing Concrete Tilt-up	300,361 SF  Site: 14.09 acres	300,361 SF 127,000 SF 300,361 SF 300,361 SF	TBD  NNN: TIs: For Sale: No	3P	22 FT 30 FT Yes Yard	Grnd: No Dock: 54 Possible
<b>Administrative Info:</b>	<b>Property ID:</b> 110002583	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 03/29/2010	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	
14 MasterBrand 600 SW Walnut St Hillsboro, OR 97123 Complex:	Whse/Distribution Existing Metal	241,770 SF 16,185 SF Site: 17.85 acres	241,770 SF 73,925 SF 167,845 SF 241,770 SF	TBD  NNN: TIs: For Sale: \$4,900,000 (\$20.27/sf)		12 FT 20 FT Yes Yard	Grnd: 8 Dock: 11 Possible
<b>Administrative Info:</b>	<b>Property ID:</b> 110004172	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 07/29/2009	<b>Date Verified:</b> 01/12/2010	<b>Listing No.:</b>	
15 Nike Distribution Center 27255 SW 95th Ave Wilsonville, OR 97070-0000 Complex:	Whse/Distribution Existing Concrete Tilt-up	508,277 SF  Site: 25.95 acres	399,277 SF 399,277 SF 399,277 SF 399,277 SF	TBD (Lease Type: NNN)  NNN: \$0.10/sf TIs: For Sale: No	3P	30 FT 30 FT	Grnd: 3 Dock: 45 No Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 110003028	<b>Vacancy Rate:</b> 78.6%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 11/11/2009	<b>Date Verified:</b> 03/20/2010	<b>Listing No.:</b>	
16 Tektronix Bldg 58 2540 SW Karl Braun Dr Beaverton, OR 97077 Complex: Tek Bvtn Campus	R&D/Flex Existing Brick	195,441 SF  Site:	195,441 SF 195,441 SF 195,441 SF 195,441 SF	\$0.85 - \$0.85 NNN BLN NNN: TIs: For Sale: No			Grnd: No Dock: No No Rail
<b>Administrative Info:</b>	<b>Property ID:</b> 100043635	<b>Vacancy Rate:</b> 100%	<b>Vacancy Index:</b> Industrial	<b>Date Updated:</b> 03/09/2009	<b>Date Verified:</b> 03/29/2010	<b>Listing No.:</b>	

**TOTAL**

**Properties: 16**

**Building SF: 3,730,358**

**Available SF: 3,389,455**

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**LARGER SPECULATIVE INDUSTRIAL: 2000-2009**  
**GREATER PORTLAND, OR**

DATA FIELD	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	AVG
TOTAL NET ABSORPTION	4,509,853	(1,116,059)	(388,644)	158,763	2,774,617	3,687,333	4,720,596	3,093,552	199,600	(2,729,442)	1,491,017
ABS FROM 150K USERS	160,000	575,599	615,075	1,648,462	1,219,550	508,225	333,000	777,250	301,665	402,228	654,105
# OF 150K TRANSACTIONS	1	3	2	4	3	2	2	4	2	2	3
150K CONTIGUOUS AVAILABLE	10	11	19	19	15	11	8	12	19	18	14

LEASE AND LOCATION	NIKE WYMORE	HANNA FIRESTONE	GP RIVERGATE	UNISOURCE I-84 IC	GP RIVERGATE	CENTRAL G&P RIVERGATE	MORAN FOOD BYBEE LAKES	NAVISTAR TOWNSEND	ODOM CORP CASCADE DC	CNH PARTS PROLOGIS PDX
LEASE AND LOCATION		800.COM RIVERGATE	FORD RIVERGATE	DEAN FOODS KELLEY PT		NAUTILUS RIVERSIDE PKWY	LAIKA ENT UPG	GP MARINE DDC	COLGATE RIVERGATE	MOR FURN KELLEY POINT

BTS OCCUPIER AND LOCATION		WC PAPER MASON		STAPLES SOUTSHORE	DOLLAR TREE RIDGEFIELD			PAC CREST RIDGEFIELD		
BTS OCCUPIER AND LOCATION				INTEL HILLSBORO	OR TRANSFER LEADBETTER			FEDEX TROUTDALE		