

Exhibit C: 2035 Comprehensive Plan Findings

Introduction

Transportation System Plan Update Stage 3 (TSP3) is the final element of the TSP update. Stages 1 and 2 were a part of the Periodic Review Work Order for the City of Portland Comprehensive Plan Update. Stages 1 and 2 were adopted by Portland City Council in 2016 and will be in effect in May 2018. TSP3 is a technical update to finish up components that are outside of Periodic Review and some sections of the TSP that are not components of the Comp Plan.

Statewide Planning Goals

Stages 1 and 2 were adopted by Portland City Council in 2016 and upon under final review by the state, they will be in effect in May 2018. The goals and policies in this section, STATEWIDE PLANNING GOALS, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Goal 11, Public Facilities and Services, requires planning and development of a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for development.

The amendments support this goal because the TSP is the Transportation Element of the City of Portland's Public Facilities Plan. This final component completes the TSP and this element of the Public Facilities Plan.

Goal 12, Transportation, requires provision of a safe, convenient, and economic transportation system.

The amendments support this goal because this is final element of the TSP update and amendments to the Comp Plan implement the Comp Plan (adopted 2016). It updates street classification descriptions and maps to further transportation goals.

The Oregon Transportation Planning Rule (TPR) was adopted in 1991 and amended in 1996 and 2005 to implement State Goal 12. The TPR requires certain findings if the proposed TSP update and Comp Plan policy update significantly affect an existing or planned transportation facility.

The goals and policies in this section, do not apply to the TSP3 Update because the proposed TSP update and Comp Plan policy update DOES NOT significantly affect an existing or planned transportation facility. These amendments support these requirements because the Level of Service will be acceptable in 2025, based on analysis done for TSP1 and TSP2. No additional analysis was needed for this additional element of TSP3. The Level of Service that will be acceptable in 2025 is established by Portland Transportation System Plan.

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Findings on Metro Urban Growth Management Functional Plan

The City of Portland has worked closely with Metro on compliance and performance measure development. Metro addressed a letter to City Council in December 2016 (attached) acknowledging that TSP1, TSP2, and TSP3 are in compliance with the Metro Urban Growth Management Functional Plan.

Findings on Portland's Comprehensive Plan, Goals and Policies

The Plan: Guiding Principles

Economic Prosperity. Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

Human Health. Avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives.

Environmental Health. Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water and land.

Equity. Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and under-represented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history

Resilience. Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and built environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts.

Transportation System Plan Update Stage 3 (TSP3) is the final element of the TSP update. Stages 1 and 2 were a part of the Periodic Review Work Order for the City of Portland Comprehensive Plan. The Guiding Principles of the Comp Plan are also the guiding Principles of the TSP and were adopted by Portland City Council in 2016 and will be in effect in May 2018.

The Plan: Goals

The goals and policies in this section, GOALS do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Goal 1.A: Multiple goals. Portland's Comprehensive Plan provides a framework to guide land use, development, and public facility investments. It is based on a set of Guiding Principles that call for integrated approaches, actions, and outcomes that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient

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TSP3 furthers the goals and policies of the Comp Plan and addresses multiple transportation related goals such as transit, performance measures, pattern areas and mode split targets.

Goal 1.B: Regional partnership. Portland's Comprehensive Plan acknowledges Portland's role within the region, and it is coordinated with the policies of governmental partners.

The City of Portland worked closely with Metro on compliance and performance measure development. Metro addressed a letter to City Council in December 2016 acknowledging that TSP1, TSP2, and TSP3 are in compliance with the Metro Urban Growth Management Functional Plan.

Goal 1.C: A well-functioning plan. Portland's Comprehensive Plan is effective, its elements are aligned, and it is updated periodically to be current and to address mandates, community needs, and identified problems.

TSP3 finalizes the update of the TSP and Comp Plan.

The Plan: Policies

The goals and policies in this section, POLICIES do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

The Comprehensive Plan

Policy 1.1, Comprehensive Plan elements. Maintain a Comprehensive Plan that includes these elements:

- **List of Significant Projects.** The List of Significant Projects identifies the public facility projects needed to serve designated land uses through 2035, including expected new housing and jobs. It is based on the framework provided by a supporting Public Facilities Plan (PFP). The Citywide Systems Plan (CSP) is the City's public facilities plan. The Transportation System Plan (TSP) includes the transportation-related list of significant projects. The list element of the TSP is also an element of the Comprehensive Plan.

List of Significant projects was adopted as part of Stage 1 with a Financial Plan. No changes are proposed as part of Stage 3, therefore in compliance with this policy.

- **Transportation policies, street classifications, and street plans.** The policies, street classifications, and street plan maps contained in the Transportation System Plan (TSP) are an element of the Comprehensive Plan. Other parts of the TSP function as a supporting document, as described in Policy 1.2.

The TSP3 update includes changes to Transportation policies, street

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classifications, and street plans are updated as part of Stage 3 to be in compliance with this goal and therefore meets this goal.

Supporting Documents

The goals and policies in this section, SUPPORTING DOCUMENTS do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 1.2, Comprehensive Plan supporting documents. Maintain and periodically update the following Comprehensive Plan supporting documents.

- 1. Public Facilities Plan.** The Public Facilities Plan (PFP) is a coordinated plan for the provision of urban public facilities and services within Portland's Urban Services Boundary. The Citywide Systems Plan (CSP) is the City's public facilities plan.

The TSP is the Transportation component of the City's Public Facilities Plan and its completion in TSP3 meets this policy.

- 2. Transportation System Plan (TSP).** The TSP is the detailed long-range plan to guide transportation system functions and investments. The TSP ensures that new development and allowed land uses are consistent with the identified function and capacity of, and adopted performance measures for, affected transportation facilities. The TSP includes a financial plan to identify revenue sources for planned transportation facilities included on the List of Significant Projects. The TSP is the transportation element of the Public Facilities Plan. Certain components of the TSP are elements of the Comprehensive Plan. See *Policy 1.1.*

TSP3 is the final component to have a complete update of the TSP and transportation element of the Comp Plan and its completion meets this policy.

Implementation tools

The goals and policies in this section, IMPLEMENTATION TOOLS do not apply to the TSP3 Update.

Administration

The goals and policies in this section, ADMINISTRATION do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 1.15, Intergovernmental coordination. Strive to administer the Comprehensive Plan elements and implementation tools in a manner that supports the efforts and fiscal health of the City, county and regional governments, and partner agencies such as school districts and transit agencies.

PBOT worked with TriMet (transit agency), the Fire Bureau, Metro and the

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Bureau of Planning and Sustainability on TSP3 and supports the efforts and fiscal health of these entities.

Policy 1.16, Planning and Sustainability Commission review. Ensure the Planning and Sustainability Commission (PSC) reviews and makes recommendations to the City Council on all proposed legislative amendments to Comprehensive Plan elements, supporting documents, and implementation tools. The PSC advises City Council on the City's long-range goals, policies, and programs for land use, planning, and sustainability. The membership and powers and duties of the PSC are described in the Zoning Code.

The TSP3 had two hearings, a work session and a vote at the Planning and Sustainability Commission in 2017. A transmittal letter dated February 19, 2018 from the PSC outlines their approval and additional information that the Commission wanted to share.

Community Involvement: Goals and Policies

Public Involvement Policies in Chapter 2 plus IAP2 best practices, PBOT best practices and other public involvement models were used during the TSP1 and TSP2 phases in coordination with the Bureau of Planning and Sustainability and meet the community engagement goals and policies of this chapter.

Specifically, for TSP3: The TSP3 Discussion Draft was open for 64 days from May 19 – July 2, 2018. Staff provided TSP outreach at 30 events across the city from the Multnomah Arts Center, to the Kenton Firehouse, to the Rosewood Initiative, and JAMS Space. Staff reviewed over 120 individual comments received during the Discussion Draft (some with multiple signatories).

Urban Form: Goals

The goals and policies in this section, URBAN FORM do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Urban Form: Policies

Citywide design and development

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The goals and policies in this section, Citywide design and development, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.1, Urban Design Framework. Use the Urban Design Framework (UDF) as a guide to create inclusive and enduring places, while providing flexibility for implementation at the local scale to meet the needs of local communities.

See *Figure 3.1 — Urban Design Framework*.

Sub policies were added to the Eastern and Western Pattern Areas to provide additional flexibility for implementation at the local scale to meet the needs of local communities.

Citywide design and development

The goals and policies in this section, CITYWIDE DESIGN AND DEVELOPMENT, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.20, Center connections. Connect centers to each other and to other key local and regional destinations, such as schools, parks, and employment areas, by frequent and convenient transit, bicycle sharing, bicycle routes, pedestrian trails and sidewalks, and electric vehicle charging stations.

Updating the Traffic and Transit Classification Descriptions and Maps assistance with the connection of centers to each other and to other key local and regional destinations, such as schools, parks, and employment areas, by frequent and convenient transit, bicycle sharing, bicycle routes, pedestrian trails and sidewalks, and electric vehicle charging stations.

Central City

The goals and policies in this section, CENTRAL CITY do not apply to the TSP3 Update. Central City 2035 is a separate process and document that has been reviewed and approved at PSC and City Council.

Gateway Regional Center

The policies in this section, GATEWAY REGIONAL CENTER do not apply to the TSP3 Update.

Town Centers

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The policies in this section, TOWN CENTERS do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.34, Transportation. Improve Town Centers as multimodal transportation hubs that optimize access from the broad area of the city they serve and are linked to the region's high-capacity transit system.

Updating Traffic and Transit Street Classification Descriptions and Maps assists the improvement of Town Centers as multimodal transportation hubs that optimize access from the broad area of the city they serve and are linked to the region's high-capacity transit system.

Neighborhood Centers

The policies in this section, NEIGHBORHOOD CENTERS, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.38, Transportation. Design Neighborhood Centers as multimodal transportation hubs that are served by frequent-service transit and optimize pedestrian and bicycle access from adjacent neighborhoods.

Updating Traffic and Transit Street Classification Descriptions and Maps assists the improvement of Neighborhood Centers as multimodal transportation hubs that optimize access from the broad area of the city they serve and are linked to the region's high-capacity transit system.

Inner Ring Districts

The policies in this section, INNER RING DISTRICTS, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.44, Active transportation. Enhance the role of the Inner Ring Districts' extensive transit, bicycle, and pedestrian networks in conjunction with land uses that optimize the ability for more people to utilize this network. Improve the safety of pedestrian and bike connections to the Central City. Strengthen transit connections between the Inner Ring Districts and to the Central City.

Corridors

The policies in this section, CORRIDORS, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.45, Growth and mobility. Coordinate transportation and land use strategies along corridors to accommodate growth and mobility needs for people of all ages and

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abilities.

Updating Traffic and Transit Street Classification Descriptions and Maps assists with the coordination of the transportation and land use strategies along corridors to accommodate growth and mobility needs for people of all ages and abilities.

Policy 3.46, Connections. Improve corridors as multimodal connections providing transit, pedestrian, bicycle, and motor vehicle access and that serve the freight needs of centers and neighborhood business districts.

Updating Traffic and Transit Street Classification Descriptions and Maps assists with the improvement of Corridors as multimodal connections providing transit, pedestrian, bicycle, and motor vehicle access and that serve the freight needs of centers and neighborhood business districts.

Civic Corridors

The policies in this section, CIVIC CORRIDORS do not apply to the TSP3 Update. Any policies in this section that are relevant are addressed.

Policy 3.49, Integrated land use and mobility. Enhance Civic Corridors as distinctive places that are models of ecological urban design, with transit-supportive densities of housing and employment, prominent street trees and other green features, and high-quality transit service and pedestrian and bicycle facilities.

Updating Traffic and Transit Street Classification Descriptions and Maps assists with the enhancement of high-quality transit service and creation of transit supportive densities along Civic Corridors.

Policy 3.50, Design great places. Improve public streets and sidewalks along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe, healthy, and attractive pedestrian environment, and contribute to quality living environments for residents.

Policy 3.51, Mobility corridors. Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way or on nearby parallel routes.

Updating Traffic and Transit Street Classification Descriptions and Maps assists with the improvement of Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way or on nearby parallel routes.

Neighborhood Corridors

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The policies in this section, NEIGHBORHOOD CORRIDORS do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 3.53, Neighborhood Corridors. Enhance Neighborhood Corridors as important places that support vibrant neighborhood business districts with quality multi-family housing, while providing transportation connections that link neighborhoods.

Updating Traffic and Transit Street Classification Descriptions and Maps assists with the enhancement of Neighborhood Corridors as important places that support vibrant neighborhood business districts with quality multi-family housing, while providing transportation connections that link neighborhoods.

Transit Station Areas

The policies in this section, TRANSIT STATION AREAS, do not apply to the TSP3 Update.

City Greenways

The policies in this section, CITY GREENWAYS, do not apply to the TSP3 Update.

Urban habitat corridors

The policies in this section, URBAN HABITAT CORRIDORS, do not apply to the TSP3 Update.

Employment areas

The policies in this section, EMPLOYMENT AREAS, do not apply to the TSP3 Update

Rivers Pattern Area

The policies in this section, RIVER PATTEN AREA, do not apply to the TSP3 Update.

Central City Pattern Area

The policies in this section, CENTRAL CITY PATTERN AREA do not apply to the TSP3 Update.

Inner Neighborhoods Pattern Area

The policies in this section, INNER NEIGHBORHOODS PATTEN AREA, do not apply to the TSP3 Update.

Eastern Neighborhoods Pattern Area

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The policies in this section, EASTERN NEIGHBORHOOD PATTERN AREA do not apply to the TSP3 Update. Any policies in this section that are relevant are addressed.

Policy 3.98, Eastern Neighborhoods active transportation. Enhance access to centers, employment areas, and other community destinations in Eastern Neighborhoods by ensuring that corridors have safe and accessible pedestrian and bicycle facilities and creating additional secondary connections that provide low-stress pedestrian and bicycle access.

Sub polices were added to Eastern Neighborhoods active transportation to increase access and connections.

Western Neighborhoods Pattern Area

The policies in this section, WESTERN NEIGHBORHOOD PATTERN AREA do not apply to the TSP3 Update. Any policies in this section that are relevant are addressed.

Policy 3.100, Western Neighborhoods active transportation. Provide safe and accessible pedestrian and bicycle connections, as well as off-street trail connections, to and from residential neighborhoods.

Sub polices were added to Western Neighborhoods active transportation to increase accessible connections.

Design and Development: Goals

The goals and policies in this section, DESIGN AND DEVELOPMENT do not apply to the TSP3 Update.

Design and Development: Policies

The policies in this section, DESIGN AND DEVELOPMENT do not apply to the TSP3 Update. Any policies in this section that are relevant are addressed.

Context

Policy 4.1, Pattern areas. Encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Portland's five pattern areas described in Chapter 3: Urban Form.

Sub polices were added to the Western and Eastern Pattern Areas to encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Portland's pattern areas.

Health and safety

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The policies in this section, HEALTH AND SAFETY, do not apply to the TSP3 Update.

Residential areas

The policies in this section, RESIDENTIAL AREAS, do not apply to the TSP3 Update.

Design and development of centers and corridors

The policies in this section, DESIGN AND DEVELOPMENT OF CENTERS AND CORRIDORS, do not apply to the TSP3 Update.

Transitions

The policies in this section, TRANSITIONS, do not apply to the TSP3 Update.

Off-site impacts

The policies in this section, OFF-SITE IMPACTS, do not apply to the TSP3 Update.

Scenic resources

The policies in this section, SCENIC RESOURCES, do not apply to the TSP3 Update.

Historic and cultural resources

The policies in this section, HISTORIC AND CULTURAL RESOURCES, do not apply to the TSP3 Update.

Public art

The policies in this section, PUBLIC ART, do not apply to the TSP3 Update.

Resource-efficient design and development

The policies in this section, RESOURCE-EFFICIENT DESIGN AND DEVELOPMENT, do not apply to the TSP3 Update.

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Designing with nature

The policies in this section, DESIGN WITH NATURE, do not apply to the TSP3 Update.

Hazard-resilient design

The policies in this section, HAZARD-RESILIENT DESIGN do not apply to the TSP3 Update.

Healthy food

The policies in this section, HEALTHYFOOD does not apply to the TSP3 Update.

Housing: Goals

The goals and policies in this section, HOUSING: GOALS, do not apply to the TSP3 Update.

Housing: Policies

The policies in this section, HOUSING: POLICIES, do not apply to the TSP3 Update.

Diverse and expanding housing supply

The policies in this section, DIVERSE AND EXPANDING HOUSING SUPPLY, do not apply to the TSP3 Update.

Housing access

The policies in this section, HOUSING ACCESS, do not apply to the TSP3 Update.

Housing location

The policies in this section, HOUSING LOCATION, do not apply to the TSP3 Update.

Housing affordability

The policies in this section, HOUSING AFFORDABILITY, do not apply to the TSP3 Update.

Homelessness

The policies in this section, HOMELESSNESS, do not apply to the TSP3 Update.

Health, safety, and well-being

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The policies in this section, HEALTH, SAFETY and WELL-BEING, do not apply to the TSP3 Update.

Economic Development: Goals

The policies in this section, ECONOMIC DEVELOPMENT: GOALS, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Goal 6.A: Prosperity. Portland has vigorous economic growth and a healthy, diverse economy that supports prosperity and equitable access to employment opportunities for an increasingly diverse population. A strong economy that is keeping up with population growth and attracting resources and talent can:

- Create opportunity for people to achieve their full potential.
- Improve public health.
- Support a healthy environment.
- Support the fiscal well-being of the city.

The policy changes and street classification descriptions and map updates in TSP3 meet this goal because streets classified and built to specifications, especially transit, can create improvements to public health via increased transit ridership which therefore supports a healthier environment.

Economic Development: Policies

The policies in this section, ECONOMIC DEVELOPMENT: POLICIES, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Diverse, expanding city economy

Policy 6.11, Sharing economy. Encourage mechanisms that enable individuals, corporations, nonprofits, and government to market, distribute, share, and reuse excess capacity in goods and services. This includes peer-to-peer transactions, crowdfunding platforms, and a variety of business models to facilitate borrowing and renting unused resources.

TSP 3 policy changes related to Policy 9.6 - Strategy for People Movement increases the importance electric, automated and shared vehicles. This will positively impact and increase the car sharing economy.

Land development

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The goals and policies in this section, LAND DEVELOPMENT, do not apply to the TSP3 Update.

Traded sector competitiveness

The goals and policies in this section, TRADED SECTOR COMPETITIVENESS, do not apply to the TSP3 Update.

Equitable household prosperity

The goals and policies in this section, EQUITABLE HOUSEHOLD PROSPERITY, do not apply to the TSP3 Update.

Central City

The goals and policies in this section, CENTRAL CITY, do not apply to the TSP3 Update.

Industrial and employment districts

The goals and policies in this section, INDUSTRIAL AND EMPLOYMENT DISTRICTS, do not apply to the TSP3 Update.

Campus institutions

The goals and policies in this section, CAMPUS INSTITUTIONS, do not apply to the TSP3 Update.

Neighborhood business districts

The goals and policies in this section, NEIGHBORHOOD BUSINESS DISTRICTS, do not apply to the TSP3 Update.

Environmental and Watershed Health: Goals

The goals and policies in this section, ENVIRONMENTAL AND WATERSHED HEALTH: GOALS, do not apply to the TSP3 Update.

Environmental and Watershed Health: Policies

The goals and policies in this section, ENVIRONMENTAL AND WATERSHED HEALTH: POLICIES, do not apply to the TSP3 Update.

Improving environmental quality and resilience

The goals and policies in this section, IMPROVING ENVIRONMENTAL QUALITY AND RESILIENCE, do not apply to the TSP3 Update.

Planning for natural resource protection

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The goals and policies in this section, PLANNING FOR NATURAL RESOURCE PROTECTION, do not apply to the TSP3 Update.

Protecting natural resources in development situations

The goals and policies in this section, PROTECTING NATURAL RESOURCES IN DEVELOPMENT SITUATIONS, do not apply to the TSP3 Update.

Aggregate resources

The goals and policies in this section, AGGREGATE RESOURCES, do not apply to the TSP3 Update.

Columbia River Watershed

The goals and policies in this section, COLUMBIA RIVER WATERSHED, do not apply to the TSP3 Update.

Willamette River Watershed

The goals and policies in this section, WILLAMETTE RIVER WATERSHED, do not apply to the TSP3 Update.

Columbia Slough Watershed

The goals and policies in this section, COLUMBIA SLOUGH WATERSHED, do not apply to the TSP3 Update.

Fanno and Tryon Creek Watersheds

The goals and policies in this section, FANNO AND TRYON CREEK WATERSHEDS, do not apply to the TSP3 Update.

Johnson Creek Watershed

The goals and policies in this section, JOHNSON CREEK WATERSHED, do not apply to the TSP3 Update.

Public Facilities and Services: Goals

The policies in this section, PUBLIC FACILITIES AND SERVICES: GOALS, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Goal 8.A: Quality public facilities and services. High-quality public facilities and services provide Portlanders with optimal levels of service throughout the city, based on system needs and community goals, and in compliance with regulatory mandates.

The TSP3 update and policy changes related to Street Classification descriptions and maps, master plans and geographic sub policies meet this goal since these policies can impact project and facility prioritization,

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and subsequent design. Strong mode share VMT reduction and congestion performance metrics create a solid policy foundation to implement significant bicycle, pedestrian, and access to transit programs and projects. Prioritizing fleet automated vehicles that are electric and shared (FAVES) will ensure equitable access to high quality mobility services.

Goal 8.B: Multiple benefits. Public facility and service investments improve equitable service provision, support economic prosperity, and enhance human and environmental health.

The public services impacted by the TSP3 update due to changes to the street classification descriptions and maps such as Emergency Response, Transit and Traffic Streets will be improved because the changes provide clarity and direction for these services. Classifications address multiple modes and therefore create multiple benefits on each street and can promote equity in services.

Goal 8.D: Public rights-of-way. Public rights-of-way enhance the public realm and provide a multi-purpose, connected, safe, and healthy physical space for movement and travel, public and private utilities, and other appropriate public functions and uses.

Street Classification Descriptions and Maps, modal targets, and modifications to the Strategy for People Movement (Policy 9.6) meet this goal as they enhance and direct the public realm and provide a multipurpose connected and safe physical space for movement and travel within the public right of way.

Public Facilities and Services: Policies

The policies in this section, PUBLIC FACILITIES AND SERVICES: POLICIES, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Service provision

Policy 8.3, Urban service delivery. Provide the following public facilities and services at urban levels of service to urban lands within the City's boundaries of incorporation:

- Public rights-of-way, streets, and public trails
- Sanitary sewers and wastewater treatment
- Stormwater management and conveyance
- Flood management
- Protection of the waterways of the state
- Water supply
- Police, fire, and emergency response
- Parks, natural areas, and recreation

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- Solid waste regulation

Updating the street classification descriptions and maps, and updating the modal targets allow the city to provide public facilities and services for public rights of way and streets at urban levels to urban lands within the City's boundaries of incorporation.

Policy 8.5, Planning service delivery. Provide planning, zoning, building, and subdivision control services within the City's Urban Services Boundary.

The TSP update will be incorporated into the to the Comp Plan and other plans, addressing this policy as it provides transportation planning services within the City's Urban Services Boundary.

Service coordination

Policy 8.6, Interagency coordination. Maintain interagency coordination agreements with neighboring jurisdictions and partner agencies that provide urban public facilities and services within the City of Portland's Urban Services Boundary to ensure effective and efficient service delivery. *See Policy 8.3 for the list of services included.* Such jurisdictions and agencies include, but may not be limited to:

- TriMet for public transit facilities and services.
- Metro for regional parks and natural areas, and for solid waste, composting, and recycling facilities and transfer stations.

Policy 8.8, Public service coordination. Coordinate with the planning efforts of agencies providing public education, public health services, community centers, urban forest management, library services, justice services, energy, and technology and communications services.

Policy 8.9, Internal coordination. Coordinate planning and provision of public facilities and services, including land acquisition, among City agencies, including internal service bureaus.

TSP3 policy changes and updates related to Classification Descriptions and Maps for Emergency Response, Traffic and Transit were developed to be in compliance with the Regional Transportation Plan and the newly adopted Comp Plan. Changes required inter-agency coordination and agreement. TriMet, the Fire Bureau, BPS and Metro were partners in development of the policies. Metro's letter dated December 2016 indicates that the TSP and this final component are in compliance with the Regional Transportation Plan. Partners at TriMet and the Fire Bureau assisted with the changes to the street classification descriptions and maps. These changes will assist with service provision and service coordination in the City and on public rights of way. PBOT worked closely with the Bureau of Planning and Sustainability on the first two stages of the TSP which were part of the Comp Plan and Periodic Review order, as well as the changes for TSP3.

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8.20 Regulatory compliance. Ensure public facilities and services remain in compliance with state and federal regulations. Work toward cost-effective compliance with federal and state mandates through intergovernmental coordination and problem solving.

The local legislative process, coordination with the State and the Region, and state review and approval of TSP3 will ensure that public facilities and services remain in compliance with state and federal regulations. The TSP and Comp Plan policies will guide future investment that will meet state and federal regulations.

Service extension

The policies in this section, SERVICE EXTENSION, do not apply to the TSP3 Update.

Public investment

Policy 8.22, Equitable service. Provide public facilities and services to alleviate service deficiencies and meet level-of-service standards for all Portlanders, including individuals, businesses, and property owners.

8.20.a, In places that are not expected to grow significantly but have existing deficiencies, invest to reduce disparity and improve livability.

8.20.b, In places that lack basic public facilities or services and also have significant growth potential, invest to enhance neighborhoods, fill gaps, maintain affordability, and accommodate growth.

8.20.c, In places that are not expected to grow significantly and already have access to complete public facilities and services, invest primarily to maintain existing facilities and retain livability.

8.20.d, In places that already have access to complete public facilities and services, but also have significant growth potential, invest to fill remaining gaps, maintain affordability, and accommodate growth.

TSP1 as part of the Project Selection Criteria, Major Project List and Programs list used an equity lens to prioritize projects and programs throughout the city. TSP3 does not direct investments or project. Transit, Traffic and Emergency Response Street Classification descriptions and map changes were developed with direction from the adopted Comp Plan Center and Corridor urban design framework which addresses growth patterns and changes for the future. Transit Classification Descriptions and Maps will impact service provision changes from partner transit agencies (TriMet) as well as direct City of Portland facility improvements (signals, sidewalks, etc.) along current and future transit lines. These service and facility improvements will be in current service areas as well as in areas that have existing service deficiencies.

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Policy 8.25, Critical infrastructure. Increase the resilience of high-risk and critical infrastructure through monitoring, planning, maintenance, investment, adaptive technology, and continuity planning.

The TSP is a living document that will be updated on a regular schedule to be in compliance with the Regional Transportation Plan, the Comp Plan and to assist in maintaining critical infrastructure through planning, monitoring, maintenance and investment. The TSP sets the stage for additional planning efforts in specific areas and corridors that are critical to the city and the region. It sets an investment strategy that saves lives, expands access to bicycle, pedestrian, and transit networks, and includes explicit policies on connected and automated vehicles.

Policy 8.26, Capital programming. Maintain long-term capital improvement programs that balance acquisition and construction of new public facilities with maintenance and operations of existing facilities.

TSP3 update continues the work from TSP1 and 2 and the Comp Plan which include the Major Projects List, TSP Programs List and a Financial Plan to maintain a long-term PBOT Capital Improvement Program.

Funding

Policy 8.27, Cost-effectiveness. Establish, improve, and maintain the public facilities necessary to serve designated land uses in ways that cost-effectively provide desired levels of service, consider facilities' lifecycle costs, and maintain the City's long-term financial sustainability.

Public benefits

Policy 8.31, Application of Guiding Principles. Plan and invest in public facilities in ways that promote and balance the Guiding Principles established in The Vision and Guiding Principles of this Comprehensive Plan.

Policy 8.35, Context-sensitive infrastructure. Design, improve, and maintain public rights-of-way and facilities in ways that are compatible with, and that minimize negative impacts on, their physical, environmental, and community context.

Changes and modifications to the Street Classification Descriptions and Maps for Transit, Emergency Response and Traffic address and highlight different areas of the City. Changes to geographically based pattern areas and new sub policies in the pattern areas related to transportation further the goals of context sensitive design.

Exhibit C: 2035 Comprehensive Plan Findings

Policy 8.36, Site- and area-specific needs. Allow for site- and area-specific public facility standards, requirements, tools, and policies as needed to address distinct topographical, geologic, environmental, and other conditions.

Changes and modifications to the Street Classification Descriptions and Maps for Transit, Emergency Response and Traffic that address and highlight sites and areas with specific needs. Changes to geographically based pattern areas and new sub policies related to transportation in the pattern areas further the goals for specific sites and areas.

Public rights-of-way

Policy 8.37, Interconnected network. Establish a safe and connected rights-of-way system that equitably provides infrastructure services throughout the city.

Street Classification Descriptions and Maps are the policy foundation that allows the establishment of safe and connected rights of way that equitably provides infrastructure services throughout the city.

Policy 8.38, Transportation function. Improve and maintain the right-of-way to support multimodal transportation mobility and access to goods and services as is consistent with the designated street classification.

Changes and modifications to the Street Classification Descriptions and Maps for Transit, Emergency Response and Traffic are the policy foundation that allows the improvements and maintenance of the right of way to support multi modal transportation mobility and access to goods and services that is consistent with the designated street classification.

Policy 8.44, Flexible design. Allow flexibility in right-of-way design and development standards to appropriately reflect the pattern area and other relevant physical, community, and environmental contexts and local needs.

Changes and modifications to the Street Classification Descriptions and Maps for Transit, Emergency Response and Traffic address and highlight the pattern areas in the city. Changes to geographically based pattern areas and new sub policies related to transportation in the pattern areas further the goals of flexible design.

Policy 8.45, Corridors and City Greenways. Ensure public facilities located along Civic Corridors, Neighborhood Corridors, and City Greenways support the multiple objectives established for these corridors.

Changes and modifications to the Street Classification Descriptions and Maps for Transit, Emergency Response and Traffic and additional sub policies in the Pattern Areas are the policy foundation that ensures public facilities located along Civic Corridors, neighborhood corridors and city greenways support the multiple objectives established for the corridors.

Exhibit C: 2035 Comprehensive Plan Findings

Policy 8.46, Coordination. Coordinate the planning, design, development, improvement, and maintenance of public rights-of-way among appropriate public agencies, private providers, and adjacent landowners.

8.46.a, Coordination efforts should include the public facilities necessary to support the uses and functions of rights-of-way, as established in Policies 8.38 to 8.41.

8.46.b, Coordinate transportation and stormwater system plans and investments, especially in unimproved or substandard rights-of-way, to improve water quality, public safety, including for pedestrians and bicyclists, and neighborhood livability.

Changes and modifications to the Street Classification Descriptions and Maps for Transit, Emergency Response and Traffic and geographic pattern area sub policies, changes to the modal targets, performance measures and Policy 9.6 were developed in coordination with TriMet, the Fire Bureau, Metro, the Bureau of Planning and Sustainability, and the community. These policy changes will support the creation of public facilities necessary to support uses and functions of the right as well as include pedestrians and bicycles on the ROW and improve neighborhood livability.

Trails

The policies in this section, TRAILS, do not apply to the TSP3 Update.

Sanitary Systems

The policies in this section, SANITARY SYSTEMS, do not apply to the TSP3 Update.

Stormwater Systems

The policies in this section, STORMWATER SYSTEMS, do not apply to the TSP3 Update.

Flood management

The policies in this section, FLOOD MANAGEMENT, do not apply to the TSP3 Update.

Water systems

The policies in this section, WATER SYSTEMS, do not apply to the TSP3 Update.

Parks and recreation

The policies in this section, PARKS AND RECREATION, do not apply to the TSP3 Update.

Public safety and emergency response

Exhibit C: 2035 Comprehensive Plan Findings

The policies in this section, PUBLIC SAFETY AND EMERGENCY RESPONSE, do not apply to the TSP3 Update.

Solid waste management

The policies in this section, SOLID WASTE MANAGEMENT, do not apply to the TSP3 Update.

School facilities

The policies in this section, SCHOOL FACILITIES, do not apply to the TSP3 Update.

Technology and communications

The policies in this section, TECHNOLOGY AND COMMUNICATIONS, do not apply to the TSP3 Update.

Energy infrastructure

The policies in this section, ENERGY INFRASTRUCTURE, do not apply to the TSP3 Update.

Transportation: Goals

The TSP3 is the final component of the TSP update which is part of the Comp Plan. TSP1 and 2 developed the transportation goals and policies in this section which were adopted by City Council in 2016 and under final review by the state. They will be in effect in May 2018. TSP3 is a continuation and culmination of transportation policies and sub policies to further these goals. The process and final products (classifications, performance measures, geographic sub policies, modal targets, policy changes) were developed with these goals as a foundation and direction.

GOAL 9.A: Safety. Transportation safety impacts the livability of a city and the comfort and security of those using City streets. Comprehensive efforts to improve transportation safety through engineering, education, enforcement and evaluation will be used to eliminate traffic-related fatalities and serious injuries from Portland's transportation system.

Goal 9.B: Multiple goals. Portland's transportation system is funded and maintained to achieve multiple goals and measurable outcomes for people and the environment. The transportation system is safe, complete, interconnected, multimodal, and fulfills daily needs for people and businesses.

GOAL 9.C: Great places. Portland's transportation system enhances quality of life for all Portlanders, reinforces existing neighborhoods and great places, and helps make

Exhibit C: 2035 Comprehensive Plan Findings

new great places in town centers, neighborhood centers and corridors, and civic corridors.

GOAL 9.D: Environmentally sustainable. The transportation system increasingly uses active transportation, renewable energy, or electricity from renewable sources, achieves adopted carbon reduction targets, and reduces air pollution, water pollution, noise, and Portlanders' reliance on private vehicles.

GOAL 9.E: Equitable transportation. The transportation system provides all Portlanders options to move about the city and meet their daily needs by using a variety of safe, efficient, convenient, and affordable modes of transportation. Transportation investments are responsive to the distinct needs of each community.

GOAL 9.F: Positive health outcomes. The transportation system promotes positive health outcomes and minimizes negative impacts for all Portlanders by supporting active transportation, physical activity, and community and individual health.

GOAL 9.G: Opportunities for prosperity. The transportation system supports a strong and diverse economy, enhances the competitiveness of the city and region, and maintains Portland's role as a West Coast trade gateway and freight hub by providing efficient and reliable goods movement, multimodal access to employment areas and educational institutions, as well as enhanced freight access to industrial areas and intermodal freight facilities. The transportation system helps people and businesses reduce spending and keep money in the local economy by providing affordable alternatives to driving.

GOAL 9.H: Cost effectiveness. The City analyzes and prioritizes capital and operating investments to cost effectively achieve the above goals while responsibly managing and protecting our past investments in existing assets.

GOAL 9.I: Airport Futures. Promote a sustainable airport (Portland International Airport [PDX]) by meeting the region's air transportation needs without compromising livability and quality of life for future generations.

Transportation: Policies

Designing and planning

Policy 9.1, Street design classifications. Maintain and implement street design classifications consistent with land use plans, environmental context, urban design pattern areas, and the Neighborhood Corridor and Civic Corridor Urban Design Framework designations.

Street design classification descriptions and maps were updated in Stage 2 of the TSP update.

Policy 9.2, Street policy classifications. Maintain and implement street policy classifications for pedestrian, bicycle, transit, freight, emergency vehicle, and automotive movement, while considering access for all modes, connectivity, adjacent planned land uses, and state and regional requirements.

TSP3 updated three Street Classification Descriptions and Maps - Transit, Traffic and Emergency Response. These classifications were updated to

Exhibit C: 2035 Comprehensive Plan Findings

reflect current policies, and considered access for all modes, connectivity, advances planned land uses (Comp Plan and Zoning); and state and regional requirements (consistent with RTP). The changes were made in collaboration with partners at TriMet, the Fire Bureau and PBOT traffic engineers to ensure consistency and alignment with plans for these agencies, as well as maintaining safety and function of the streets. Updates to the classifications allow a wider range of traffic calming tools to provide desired modifications to neighborhood streets. Minor transportation improvements are under consideration to address neighborhood concerns related to traffic and transit classification changes that align current function with policy.

Policy 9.3, Transportation System Plan. Maintain and implement the Transportation System Plan (TSP) as the decision-making tool for transportation-related projects, policies, programs, and street design.

Finalizing TSP3 and creating a final unified document meets this policy. A new online and web based document is under development to make implementation and maintenance of the TSP easier and more transparent in the future.

Policy 9.4, Use of classifications. Plan, develop, implement, and manage the transportation system in accordance with street design and policy classifications outlined in the Transportation System Plan.

TSP3 updated three Street Classification Descriptions and Maps - Transit, Traffic and Emergency Response. These classifications were updated to allow the development and implementation of the system as outlined in the TSP.

Policy 9.5, Mode share goals and Vehicle Miles Travelled (VMT) reduction. Increase the share of trips made using active and low-carbon transportation modes. Reduce VMT to achieve targets set in the most current Climate Action Plan and Transportation System Plan, and meet or exceed Metro's mode share and VMT targets.

Mode share targets were updated in TSP3 to increase the share of trips using active and low-carbon transportation modes, as well as work at home targets. Policy 9.6 (strategy for people movement) was updated to highlight EVs, AVs and shared mobility and to meet the updated Climate Action Plan. Metro indicated in a letter dated December 2016 that the mode split targets and performance measure development meet Metro's mode share and targets.

Policy 9.6, Transportation strategy for people movement. Design the system to accommodate the most vulnerable users, including those that need special

Exhibit C: 2035 Comprehensive Plan Findings

accommodation under the Americans with Disabilities Act (ADA). Implement a prioritization of modes for people movement by making transportation system decisions according to the following ordered list:

- Walking
- Bicycling
- Transit
- Taxi / commercial transit / shared vehicles
- Zero emission vehicles
- Other single-occupancy vehicles
- When implementing this prioritization ensure that:
 - The needs and safety of each group of users are considered, and changes do not make existing conditions worse for the most vulnerable users.
 - All users' needs are balanced with the intent of optimizing the right of way for multiple modes on the same street.
 - When necessary to ensure safety, accommodate some users on parallel streets as part of multi-street corridors.
 - Land use and system plans, network functionality for all modes, other street functions, and complete street policies, are maintained.
 - Policy-based rationale is provided if modes lower in the ordered list are prioritized.

This policy is being updated as part of TSP3 and can be seen in Exhibit B of the document. The policy added electric and automated vehicles to the list. These changes were made to further address the Climate Action Plan, the Electric Vehicle Strategy (adopted by City Council in November 2016) climate change, the shared economy, and automated vehicles.

Policy 9.9, Geographic policies. Adopt geographically-specific policies in the Transportation System Plan to ensure that transportation infrastructure reflects the unique topography, historic character, natural features, system gaps, economic needs, demographics, and land uses of each area. Use the Pattern Areas identified in Chapter 3: Urban Form as the basis for area policies.

TSP 3 added sub-policies to the Eastern and Western Pattern Areas to address the unique transportation needs of these areas.

Land use, development, and placemaking

Policy 9.10, Land use and transportation coordination. Implement the Comprehensive Plan Map and the Urban Design Framework through coordinated long-range transportation and land use planning. Ensure that street policy and design classifications and land uses complement one another.

PBOT Staff Worked closely with BPS coordinating the TSP1, TSP2 and

Exhibit C: 2035 Comprehensive Plan Findings

TSP3 updates to ensure that policy changes continue to implement the Comprehensive Plan Map and the Urban Design Framework through coordinated long-range transportation and land use planning.

Policy 9.11, Growth strategy. Use street design and policy classifications to support Goals 3A-3G in Chapter 3: Urban Form. Consider the different design contexts and transportation functions in Town Centers, Neighborhood Centers, Neighborhood Corridors, Employment Areas, Freight Corridors, Civic Corridors, Transit Station Areas, and Greenways.

Policy 9.12, Development and street design. Evaluate adjacent land uses to help inform street classifications in framing, shaping, and activating the public space of streets. Guide development and land use to create the kinds of places and street environments intended for different types of streets.

Streets as public spaces

The policies in this section, STREETS AS PUBLIC SPACES, do not apply to the TSP3 Update.

Modal policies

The Modal Plans section of the TSP was updated as part of TSP3 while at the same time there are specific modal plans adopted by the city for Bicycles (2010), Freight (2007), and the Pedestrian Modal Plan is being updated in 2018. These more specific modal plans give the best direction for these modes. Additional modal plans and updates to the Freight Master Plan are a part of PBOT's work plan in the future to have more robust modal plans for all modes.

Policy 9.37, Automobile transportation. Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

Mode share targets were updated in TSP3 to increase the share of trips using active and low-carbon transportation modes, as well as work at home targets. Policy 9.6 (strategy for people movement) was updated to highlight EVs, AVs and shared mobility and to meet the updated Climate Action Plan and to support the reduction of negative impacts of private, zero occupant, and single occupant automobiles.

Policy 9.38, Automobile efficiency. Coordinate land use and transportation plans and programs with other public and private stakeholders to encourage vehicle technology innovation, shifts toward electric and other cleaner, more energy-efficient vehicles and fuels, integration of smart vehicle technology with intelligent transportation systems, and greater use of options such as car-share, carpool, and taxi.

Traffic Classifications were updated and Electric Vehicles, Autonomous

Exhibit C: 2035 Comprehensive Plan Findings

Vehicles, and Shared Mobility were updated Policy 9.6 to prioritize shared automated electric vehicles.

Policy 9.39, Emergency response. Maintain a network of accessible emergency response streets to facilitate safe and expedient emergency response and evacuation. Ensure that police, fire, ambulance, and other emergency providers can reach their destinations in a timely fashion, without negatively impacting traffic calming and other measures intended to reduce crashes and improve safety.

Emergency Response Classifications were updated in TSP3 with the coordination and input of the Portland Fire Bureau and PBOT traffic engineers to maintain a network of accessible emergency responses streets.

Airport Futures

The policies in this section, AIRPORT FUTURES, do not apply to the TSP3 Update.

System management

The policies in this section, SYSTEM MANAGEMENT, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 9.47, Technology. Encourage the use of emerging vehicle and parking technology to improve real-time management of the transportation network and to manage and allocate parking supply and demand.

TSP3 amends policies related to autonomous and connected vehicles. This includes policies that encourage emerging technology to collect data that helps to manage the curb zone and right of way in a manner that is safe, efficient, and effective.

Policy 9.48, Performance measures. Establish multimodal performance measures and measures of system completeness to evaluate and monitor the adequacy of transportation services based on performance measures in goals 9.A. through 9.I. Use these measures to evaluate overall system performance, inform corridor and area-specific plans and investments, identify project and program needs, evaluate and prioritize investments, and regulate development, institutional campus growth, zone changes, Comprehensive Plan Map amendments, and conditional uses.

Updated multimodal performance measures and measures of system completeness are proposed as part of the TSP3 update and implementation tools.

Transportation Demand Management

Exhibit C: 2035 Comprehensive Plan Findings

Policy 9.52, New development. Create and maintain TDM regulations and services that prevent and reduce traffic and parking impacts from new development and redevelopment. Encourage coordinated area-wide delivery of TDM programs. Monitor and improve the performance of private-sector TDM programs.

Code language in Title 17 is being updated as part of TSP3 to include a reference for a fee schedule for TDM related to new development.

Parking management

The policies in this section, PARKING MANAGEMENT, do not apply to the TSP3 Update.

Finance, programs, and coordination

The policies in this section, FINANCE, PROGRAMS, AND COORDINATION, do not apply to the TSP3 Update. Any goals and policies in this section that are relevant are addressed.

Policy 9.61, Coordination. Coordinate with state and federal agencies, local and regional governments, special districts, other City bureaus, and providers of transportation services when planning for, developing, and funding transportation facilities and services.

PBOT worked closely with Metro, the Bureau of Planning and Sustainability, the Fire Bureau and the community on the TSP3 update when planning for, developing, and funding transportation facilities and services.

Policy 9.64, Telecommuting. Promote telecommuting and the use of communications technology to reduce travel demand.

At the direction of the Planning and Sustainability Commission, a new work from home mode split target was added as part of TSP 3 to address telecommuting. The Planning and Sustainability Commission added a directive in their transmittal letter to the City Council dated February 19, 2018 (Exhibit A) to further telecommuting options for City of Portland employees.

Land Use Designations and Zoning: Goals

The policies and goals in this section, LAND USE DESIGNATIONS AND ZONING: GOALS, do not apply to the TSP3 Update.

Land Use Designations and Zoning: Policies

Exhibit C: 2035 Comprehensive Plan Findings

The policies and goals in this section, LAND USE DESIGNATIONS AND ZONING: POLICIES, do not apply to the TSP3 Update.

Land use designations

The policies in this section, LAND USE DESIGNATIONS, do not apply to the TSP3 Update.

The Zoning Map and the Zoning Code

The policies in this section, THE ZONING MAP AND THE ZONING CODE, do not apply to the TSP3 Update.



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December 20, 2016

Mayor Charlie Hales
Portland City Councilors
City of Portland, City Hall
1221 SW Fourth Avenue
Portland, OR 97204

RE: Transportation System Plan Stage 2: compliance with regional transportation requirements

Dear Mayor Hales and City Councilors:

Portland is a crucial partner for protecting quality of life in the region for decades to come. I would like to thank Bureau of Transportation and Planning and Sustainability staff for working consistently and proactively with Metro to ensure that regional requirements are reflected in the city's updated Transportation System Plan.

Portland is updating and adopting the Transportation System Plan in three stages. Metro provided a letter in June 2016 acknowledging compliance with regional requirements for Stage 1 of the Transportation System Plan. This letter comments on how Stage 2 of the Transportation System Plan complies with applicable Metro code sections. Stage 3 of the update will finalize the last components of the Transportation System Plan with an expected adoption date for the final Transportation System Plan in December 2017. This will be past the city's compliance deadline of December 2016. However, most of the components of Stage 3 are not required for state or Metro compliance but are housekeeping and internal compliance; finalizing performance measures are the components that require compliance with regional requirements. However, the City has made significant progress on the remaining components of Stage 3 and is working in coordination to develop the remaining parts such that Metro recognizes the plan as in compliance with regional transportation requirements. Please enter this letter into the record for these proceedings.

Regional Transportation Functional Plan (Metro Code, Chapter 3.08) compliance

The Regional Transportation Functional Plan (RTFP) implements the Goals and Objectives in section 2.3 of the RTP and the policies of the 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. As described below, there are several RTFP sections that are relevant to the elements in Stage 2 of the proposed Portland Transportation System Plan. Through its Further Findings of Fact – Comprehensive Plan Implementation Ordinance, the City has demonstrated that it is in compliance with all of the relevant sections of the RTFP.

Title 1- Transportation System Design

Title 1 addresses street, transit, freight, bicycle and pedestrian system design, green street design, street connectivity, bicycle and pedestrian connections to the transit system, modal plans, and system management. The City has provided findings that demonstrate that it meets and is in compliance with Title 1 of the RTFP.

Title 2 – Development and Update of Transportation System Plans

Title 2 describes certain elements that must be included and standards that apply when a city updates its Transportation System Plan (TSP). The City has provided findings that demonstrate that it meets and is in compliance with Title 2 of the RTFP.

Title 3 – Transportation Project Development

Title 3 requires the City to identify the location and general description/parameters of planned facilities. The TSP is consistent with this title because the project list has been mapped, and includes project descriptions/parameters, estimated costs, and timeframes.

Title 4 - Regional Parking Management

Title 4 requires cities to establish parking ratios within a specified range (minimums and maximums) in their development codes. This title also requires that cities establish minimum bicycle parking requirements, and requires certain design standards for large parking areas. The title also requires parking management plans and policies in centers and station communities. The City has provided findings that demonstrate that it meets and is in compliance with Title 4 of the RTFP.

Title 5 – Amendment of Comprehensive Plans

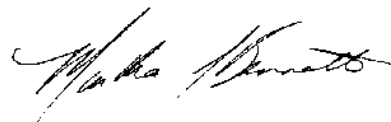
Title 5 requires cities to consider certain strategies, including, transportation system management, transportation demand management, transit improvements, bike improvements, pedestrian improvements, traffic calming, land use, connectivity, and capacity. The City has provided findings demonstrating that these strategies have been incorporated into the plan and is therefore in compliance with Title 5 of the RTFP.

Title 6 – Compliance Procedures

Title 6 describes procedures a city must follow to be in compliance with the RTFP. The City has fulfilled these procedures and is in compliance with Title 6 of the RTFP.

Metro thanks you for the opportunity to participate in this process and looks forward to our continued partnership.

Respectfully,



Martha Bennett
Chief Operating Officer

Cc: Roger Alfred, Metro
Eric Engstrom, Portland BPS
Courtney Duke, PBOT
Elissa Gertler, Metro
Lake McTighe, Metro