

**BEND METROPOLITAN PLANNING ORGANIZATION**

710 NW Wall Street, PO Box 431, Bend, OR 97709

Phone: 541-693-2113 \* FAX: 541-385-5519

August 25, 2005

Robert Cortright  
Department of Land Conservation and Development  
Transportation and Growth Management Program  
635 Capitol Street NE, Suite 150  
Salem, OR 97301

Re: Proposed TPR Amendments for MPO Areas

Dear Mr. Cortright,

Staff from the Bend Metropolitan Planning Organization has reviewed the proposed TPR amendments for MPO areas and offers the following comments.

*660-012-0016 (New Section)*

- Section (2) (b) includes a timeframe of 6-months for local governments to update local plans or adopt amendments to comply with the federally-required plan. The proposed timeframe is quite short and may not be feasible for local governments. A longer timeframe of 12 months may be more reasonable to allow staff to complete the necessary work and public process requirements.
- Section (5). BMPO staff strongly supports this new section. The BMPO will be developing a regional transportation plan that extends beyond the timeframes contained in the local comprehensive plans. The regional transportation plan may also require an allocation of housing and employment to areas outside the acknowledged urban growth boundary. The draft language in section (5) identifies a reasonable process that will allow continued development of the BMPO regional transportation plan now and into the future.

*660-012-0035*

- Section (3) (e) includes new language requiring MPO areas to plan for transportation options as the means to reduce reliance on the automobile. BMPO staff supports the proposed change. Many communities have limited transportation options but are planning for and implementing system options. Implementation of these system options will ultimately lead to reduced reliance on the auto.
- Sections (4) and (5) remove the VMT reduction requirement and include new language requiring MPO areas to adopt standards to measure progress towards increasing transportation options. Staff strongly supports the proposed change. A reduction in per capita VMT is just one of many possible standards for measuring progress. Developing and adopting a broad set of standards will enable local

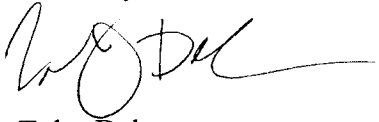
jurisdictions and policy officials to monitor and evaluate progress in providing transportation options. To date, the four established metropolitan areas have opted to develop individualized standards in place of meeting the VMT requirement. As a new metropolitan area, the BMPO can use the work completed in the other metropolitan areas to develop a set of standards suitable and applicable to our region.

660-012-0055

- Section (1) (c) (A)–(D). The listed items are already listed in 0035 (5) (c) (A)-(E). Is it necessary to list the items in this section? This section (0055) also includes a provision to adopt a long-term land use and transportation vision. Section 0035 does not include a provision for adopting a vision. Sections 0035 and 0055 should be consistent. Local comprehensive plans articulate a “vision” through the adopted goals and policies. As required by the TPR and other statewide planning goals and rules, these local plans identify and plan for the connection between land use and transportation. As such, is it necessary to adopt a “new” vision?

Thank you for your consideration of these comments. Please contact me if you have any questions or comments.

Sincerely,



Tyler Deke  
BMPO Manager

c: BMPO Policy Board  
BMPO TAC  
Brian Shetterly, City of Bend  
Rick Root, City of Bend  
David Knitowski, City of Bend  
Damian Syrnyk, City of Bend  
Robin Lewis, City of Bend