



DLCD

Department of
Land Conservation
& Development

RAC 2 Discussion Memo

Transportation Planning Rulemaking – 2026

Oregon Department of Land Conservation and Development

August 24, 2026

This document includes items requiring further review and discussion by the advisory committee. The advisory committee discussed these items in the first advisory committee meeting or advisory committee members otherwise brought them up to staff.

The document addresses items listed in the [Proposed Amendments](#), then issues not included in that list.

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Item 23

During the advisory committee meeting, the committee discussed if the broad language proposed in [item 23](#) for [OAR 660-012-0325](#) would exempt small scale transportation system plan (TSP) amendments from review requirements and thus circumvent the intent of the rule.

Staff considered the potential for problems, and methods to delineate which types of transportation system plan amendments should trigger this exemption, and which may not. The clearest option would be to use the distinction between major updates and minor updates as described in [OAR 660-012-0105](#). However, most minor transportation system updates would already consider transportation impacts and do not need to be subject to the review in [OAR 660-012-0325](#).

- *Staff do not recommend any changes.* There is no clear way to delineate which types of amendments should be reviewed and which should not, and no existing examples of the misuse of the exemption.

Item 25

During the advisory committee meeting, a committee member asked about the actual conflicting provision [item 25](#) addresses. The proposed change would fix an inconsistency within the rule.

Proposed changes:

[OAR 660-012-0415](#)(1)(a):

(a) Parking maximums shall be no higher than 1.2 off-street parking spaces per studio unit and two off-street parking spaces per non-studio residential unit in a multi-unit housing development in climate-friendly areas ~~and within one-half mile walking distance of priority transit corridors~~. These maximums shall include visitor parking;

Section (1) of the rule requires parking maximums for land uses in areas near transit, generally. The more specific requirement in subsection (1)(a) applies to multi-unit residential land uses only.

The provision that we propose to strike in subsection (1)(a) describes areas near transit that are very similar to, but not exactly, the areas described in the parent section. The other subsections do not include a phrase about applicable areas. Removing this phrase in the subsection provides

consistency throughout the section and avoids inconsistent requirements for different types of land uses in parts of the community.

➤ *Staff recommend retaining this proposed change.*

Item 26

During the advisory committee meeting, the committee discussed making a small addition (**highlighted below**) to the draft language of [item 26](#) to be clear the requirement only applies to parking garages.

Adopted language:

[OAR 660-012-0415\(2\)\(d\)](#):

(d) Adopt design requirements requiring applicants to demonstrate that the ground floor of new private and public structured parking that fronts a public street and includes more than 100 parking spaces would be convertible to other uses in the future, other than driveways needed to access the garage.

Original proposed changes:

(d) Adopt design standards for parking structures with more than 100 parking spaces in climate-friendly areas and Metro Region 2040 Centers. The standards must require that street facing parking areas on the ground floor be designed to enable conversion to other uses. The design standards may allow for driveways through the street facing area to access areas of the parking structure not designed for conversion. ~~requirements requiring applicants to demonstrate that the ground floor of new private and public structured parking that fronts a public street and includes more than 100 parking spaces would be convertible to other uses in the future, other than driveways needed to access the garage.~~

Updated proposed changes:

(d) Adopt design standards for parking structures with more than 100 parking spaces in climate-friendly areas and Metro Region 2040 Centers. The standards must require that street facing parking areas on the ground floor of parking structures be designed to enable conversion to other uses. The design standards may allow for driveways through the street facing area to access areas of the parking structure not designed for conversion. ~~requirements requiring applicants to demonstrate that the ground floor of new private and public structured parking that fronts a public street and includes more than 100 parking spaces would be convertible to other uses in the future, other than driveways needed to access the garage.~~

➤ *Staff welcome advisory committee input on this item.*

Item 34

During the advisory committee meeting, the committee discussed making the draft language of [item 34](#) clearer that one corrective action could help achieve more than one missed target. Staff have developed two options to do this.

Adopted language:

[OAR 660-012-0900](#)(7)(c)(D):

(D) For any performance targets that were not met, a proposal for the corrective actions that will be taken to meet the performance target by the next major report;

Original proposed changes:

(D) For each ~~any~~ performance target ~~targets~~ that was ~~were~~ not met, a proposal for the corrective actions that will be taken to meet the performance target by the next major report;

Updated proposed changes:

Option A – added sentence:

(D) For each any performance target targets that was were not met, a proposal for the corrective actions that will be taken to meet the performance target by the next major report. Proposed corrective actions may be used to meet more than one missed performance target;

Option B – rewritten paragraph:

~~D) For any performance targets that were not met, a proposal for the corrective actions that will be taken to meet the performance target by the next major report;~~ Proposed corrective actions that are expected to address any missed performance targets, with one or more proposed corrective actions for each missed performance target;

➤ *Staff welcome advisory committee input on this item.*

Rule 0005: Definition of “Vehicle Miles Traveled”

The definition of “Vehicle Miles Traveled” (VMT) in [OAR 660-012-0005](#)(64) includes all travel by households living within the metropolitan area, regardless of where the travel occurs. An advisory committee member raised a concern that local governments do not have good tools to affect trips that go outside of the area.

There are multiple methods that could be used to define VMT. Any definition must draw a line where some trips are counted, and others are not. DLCD worked closely with the Oregon Department of Transportation, the Oregon Department of Environmental Quality, and the Oregon Department of Energy to develop this definition. The transportation planning rules are not the only place where the definition is used, and a change would make it impossible to make comparisons across different measurements.

Additionally, local governments and the state are using this definition to develop scenario plans and set regional and local targets. The tools

developed to measure, estimate, forecast, and project future VMT are all based on this definition.

- *Staff do not recommend any changes.* A change to this definition would cause substantial added cost and delay to local governments and the state without a clear benefit.

Rule 0012: Deadline for completion of transportation system plan

[OAR 660-012-0012](#)(4)(a) requires many cities and counties to have a transportation system plan (TSP) that meets updated standards no later than December 31, 2029. Many jurisdictions have made progress toward this goal. However, some TSP projects are yet to begin, with just over three years remaining.

Cities and counties may request adjustments to the dates listed in [OAR 660-012-0012](#)(4), and director may approve alternate dates. [OAR 660-012-0012](#)(3)(b) sets the latest possible alternative date as December 31, 2029, with one exception: the director may approve an alternate date after December 31, 2029 for a major update to a transportation system plan.

- *Staff do not recommend any changes.* The existing rule allows the director to approve an alternative date for TSP updates after the 2029 deadline.

Rule 0330: Require airport compatibility

[OAR 660-012-0330](#)(8)(c) requires cities and counties to implement land use regulations that protect public use airports, as provided in [OAR 660-013-0080](#). An advisory committee member noted that [OAR 660-012-0100](#) does not require cities and counties to include an air transportation plan as part of a local transportation system plan (TSP).

[OAR 660-012-0330](#)(8) is a parallel to [OAR 660-012-0045](#)(2) that continues to apply to cities and counties outside metropolitan areas. The commission kept these requirements for cities and counties in metropolitan areas to

ensure the continuity of key requirements in the transportation planning rules (TPR).

While the TPR no longer requires an air system plan as part of a local TSP in metropolitan areas, Statewide Planning Goal 12 requires cities and counties to “consider all modes of transportation including... air.” The way the updated rules require this is to ensure cities and counties with affected lands around airports meet the applicable requirements of [OAR chapter 660, division 13](#). Local comprehensive plans and implementing ordinances must continue to consider the air system and necessary land use compatibility measures.

- *Staff do not recommend any changes.* There is a continuing need for cities and counties to plan for and implement land use compatibility around airports.