



Oregon

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Department of Transportation

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DATE: December 8, 2011

TO: Oregon Transportation Commission

FROM: Matthew L. Garrett
Director

SUBJECT: Agenda D – Oregon Highway Plan (OHP) Policy 1F Revisions (Mobility Standards)

Requested Action(s):

Approve a request to amend Oregon Highway Plan Policy 1F Revisions (Mobility Standards) addressing the recommendations of the Joint Subcommittee on the Transportation Planning Rule (TPR) and OHP, and the requirements of Senate Bill (SB) 795 (2011 Legislative Session). Approve a request to adopt the supporting information for the OHP Policy 1F amendments as part of the record, including the "Findings of Compliance with Statewide Planning Goals" for the OHP amendments.

Background:

The Oregon Transportation Commission (OTC) and the Land Conservation and Development Commission (LCDC) established a Joint Subcommittee on the TPR and OHP in response to stakeholder concerns about TPR Section 0060 and OHP mobility standards. Oregon Transportation Commissioners Lohman and Olson have served on this joint subcommittee along with three members of LCDC.

The joint subcommittee heard considerable testimony that the combination of TPR Section 0060 and OHP mobility standards is leading to unintended consequences, with two general themes frequently mentioned. One primary theme is that economic development, transportation and land use objectives should be balanced better. Testimony indicated that the TPR and OHP in practice are giving precedence to transportation mobility. The other primary theme is that transportation requirements can make it more difficult to increase development intensities, especially within urban centers, contrary to statewide planning goals and many community objectives.

In April 2011, the OTC and LCDC directed the Oregon Department of Transportation (ODOT) and the Department of Land Conservation and Development (DLCD) respectively, to implement the joint subcommittee's recommendations addressing stakeholder concerns on TPR Section 0060 and OHP mobility standards.

The TPR and OHP were also considered during the 2011 Legislative Session through the passage of SB 795. This bill recognized the work of the joint subcommittee and established timeline requirements for the efforts. SB 795 requires the OTC to adopt changes to the OHP by January 1, 2012. The bill requires LCDC to adopt changes to the TPR by the same deadline.



ODOT considered input received during the joint subcommittee process and earlier stakeholder efforts to draft initial OHP Policy 1F revisions. Staff also provided draft materials to the TPR Rules Advisory Committee, appointed by LCDC, in an effort to coordinate the two work areas and collect broader input on the proposed OHP policy revisions. The OTC reviewed the draft revisions to OHP Policy 1F at its September 21, 2011, meeting and released the draft for public review and comment.

During the public review period, ODOT staff consulted with Area Commissions on Transportation (ACTs), OTC-appointed advisory committees and other interested stakeholders through meetings, presentations and notification of public review information. The OTC also held a public hearing on November 16, 2011, to provide an additional opportunity for interested stakeholders to submit comments and to testify directly to the commission.

The public comment period closed November 21, 2011, allowing staff to consider and incorporate the feedback received and to prepare final policy revisions and supporting information for commission review and proposed action on December 21, 2011. This schedule is necessary for the commission and ODOT to meet the legislative deadlines established in SB 795.

Attachments:

- Attachment A - OHP Policy 1F Proposed Revisions: Final OTC Review Draft
- Attachment B - Overview of Supporting Information for OHP Policy 1F Revisions
- Attachment C - Draft Findings of Compliance with Oregon's Statewide Planning Goals
- Attachment D - OHP Policy 1F Proposed Revisions: Final OTC Review Draft (Track Changes from Public Review Draft)
- Attachment E - Summary of Comments on OHP Policy 1F Public Review Draft and Proposed Actions
- Attachment F - Record of Outreach
- Attachment G - Public Review Period Comments

Additional background information and materials are available on the OHP project website at:
<http://www.oregon.gov/ODOT/TD/TP/OHP2011.shtml>

Copies (w/attachments) to:

<i>Jerri Bohard</i>	<i>Joan Plank</i>	<i>Patrick Cooney</i>	<i>Clyde Saiki</i>
<i>Paul Mather</i>	<i>Erik Havig</i>	<i>Michael Rock</i>	<i>Region Managers</i>
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Overview of Supporting Information for Oregon Highway Plan Policy 1F Revisions

The following documentation is in support of the proposed revisions to Oregon Highway Plan (OHP) Policy 1F (Mobility Standards) and include the “Draft Findings of Compliance with Oregon’s Statewide Planning Goals.”

Process Background

Based on recommendations from the Joint Subcommittee on the Transportation Planning Rule (TPR) and OHP, and the requirements established in Senate Bill (SB) 795 from the 2011 Legislative Session, the Oregon Department of Transportation (ODOT) has developed proposed revisions to OHP Policy 1F (Mobility Standards). The focus of the policy changes are based on concerns that TPR Section 0060 and OHP mobility standards are having unintended consequences for economic and community development objectives. The OHP Policy 1F revisions were developed in a coordinated process with amendments to the TPR being considered by the Land Conservation and Development Commission (LCDC) to better balance economic development, transportation and land use objectives. To address these concerns, as well as to fulfill the requirements in SB 795, OHP and TPR amendments are required to be completed by January 1, 2012.

The Oregon Transportation Commission (OTC) reviewed the draft OHP Policy 1F revisions and released the document for public review and comment at the Commission’s September 21, 2011 Meeting. During the public review period (September 21 to November 21, 2011) ODOT staff consulted with a number of groups and stakeholders to gather input on the proposed draft. The OTC also held a public hearing on November 16, 2011 to gather additional input and provide the opportunity for public testimony.

ODOT considered all of the comments received during the public review period and has recommended a series of changes to address much of the input. A large number of comments apply to technical or process revisions to ODOT’s guidance documents and have been captured accordingly. Some comments ask the OTC to consider items for further work. Staff have flagged these items for OTC consideration in future work program discussions.

Key Elements of Policy Revisions

A number of revisions to OHP Policy 1F are recommended based on the comments received during the public review and outreach period. The primary policy changes are highlighted below. A more comprehensive overview of the public review comments and recommendations is available in the “Summary of Comments on OHP Policy 1F Public Review Draft and Proposed Actions” attached. Highlights of the recommended policy revisions include:

- More direct policy language on tradeoffs when balancing a broad range of policy objectives that can impact the mobility performance of the state highway system.

- More clearly defining implementation concepts for mobility targets as a starting point when developing system and facility plans, and their application as a more defined standard as required in the TPR, when a baseline is needed.
- Clearer expectations for coordinating with stakeholders and affected local jurisdictions in developing alternative mobility targets.
- Revisions to “avoiding further degradation” of facilities currently not meeting, or projected to not meet, the mobility target when improvements are not planned within the planning horizon. This change is consistent with TPR revisions under consideration.
- Addition of OHP Action 1F.10 acknowledging the potential impacts from policy revisions on mobility performance of state highways and requiring an evaluation of policy revisions within three years.

Potential Next Steps in OHP Policy 1F Implementation

Some of the comments received during the public review period raised concerns on the mobility impacts of the proposed Policy 1F revisions implementing SB 795 direction. Other comments supported the changes, but recommended steps to ensure successful implementation. While the specifics of these suggestions are included in the public comment record and summary documents, staff has highlighted some themes for the Commission.

- Update guidance documents to help with policy implementation
 - A substantial revision of the 2009 OHP Mobility Standard Guidelines is needed to provide background on the objectives behind recent revisions and an overview, including clarification on implementation and interpretation, of the revised Policy 1F and associated Actions. Research on performance measures will also inform future guidance and tools.
 - Modest changes to ODOT’s Transportation System Planning Guidelines are needed for consistency with the updated Policy 1F.
 - Modest changes to ODOT’s Development Review Guidelines are needed for consistency with the updated Policy 1F; more substantial changes are likely necessary to implement and administer the revised TPR Section -0060.
- Develop a Training Program and Schedule
 - The Department will develop steps to implement revised Policy 1F and the amendments to the TPR considered by LCDC.
- Continue discussions with the Federal Highway Administration and ODOT Technical Services on enhanced coordination between planning (including OHP Policy 1F) and design, in particular as related to the Highway Design Manual.
- Review Special Transportation Areas (STAs) in OHP Policy 1B, Land Use and Transportation

- Consistent with recommendations from the TPR Rules Advisory Committee, review Policy 1B for possible coordination between STAs with the policy and intent of Multimodal Mixed-use Areas in the draft TPR.
- OHP Policy 1F Review (OHP Action 1F.10)
 - Review effectiveness of OHP Policy in meeting broad objectives, the impacts on transportation system performance and safety, and any unintended consequences resulting from implementation. One reviewer also recommended that as a part of this evaluation, ODOT should consider implementation of the SB 264 (access management revisions) and the combined impact of changes on safety. One comment also recommended a broader review of mobility target levels.

Supporting Documentation

- Draft Findings of Compliance with Oregon’s Statewide Planning Goals
- OHP Policy 1F Proposed Revisions (Track Changes from Public Review Draft)
- Summary of Comments on OHP Policy 1F Public Review Draft and Proposed Actions
- OHP Policy 1F Revisions: Record of Outreach
- OHP Policy 1F Revisions: Public Review Period Comments (Complete Record)

OHP Policy 1F Revisions
Adopted by Oregon Transportation Commission: December 21, 2011

1999 OREGON HIGHWAY PLAN

HIGHWAY MOBILITY POLICY

Background

The Highway Mobility Policy establishes state highway mobility targets that implement the objectives of the Oregon Transportation Plan (OTP) and other OHP policies. The policy does not rely on a single approach to determine transportation needs necessary to maintain acceptable and reliable levels of mobility on the state highway system. It offers the flexibility to consider and develop methodologies to measure mobility that are reflective of current and anticipated land use, transportation and economic conditions of the state and in a community.

While ODOT measures vehicular highway mobility performance through volume to capacity (v/c) ratios (see Tables 6 and 7) when making initial determinations of facility needs necessary to maintain acceptable and reliable levels of mobility on the state highway system, achieving v/c targets will not necessarily be the determinant of the transportation solution(s). Policy 1F recognizes and emphasizes opportunities for developing alternative mobility targets (including measures that are not v/c-based) that provide a more effective tool to identify transportation needs and solutions and better balance state and local community needs and objectives. Through this policy, the state acknowledges that achieving important community goals may impact mobility performance and that higher levels of congestion may result in certain areas.

Several policies in the OHP establish general mobility objectives and approaches for maintaining mobility.

- Policy 1A (State Highway Classification System) describes in general the functions and objectives for several categories of state highways. Greater mobility is expected on Interstate and Statewide Highways than on Regional and District Highways.
- Policy 1B (Land Use and Transportation) has an objective of coordinating land use and transportation decisions to maintain the mobility of the highway system. The policy identifies several land use types and describes in general the levels of mobility objectives appropriate for each.
- Policy 1C (State Highway Freight System) has an objective of maintaining efficient through movement on major truck Freight Routes. The policy identifies the highways that are Freight Routes.

- Policy 1G (Major Improvements) has the purpose of maintaining highway performance and improving highway safety by improving system efficiency and management before adding capacity.

Although each of these policies addresses mobility, none provide measures by which to describe and understand levels of mobility and evaluate what levels are acceptable for the various classifications of state highway facilities.

The Highway Mobility Policy identifies how the state measures mobility and establishes targets that are reasonable and consistent with the direction of the OTP and OHP policies. This policy carries out Policies 1A and 1C by establishing mobility targets for Interstate Highways, Freight Routes and other Statewide Highways that reflect the expectation that these facilities maintain a level of mobility to safely and efficiently support statewide economic development while balancing available financial resources. It carries out Policy 1B by acknowledging that lower vehicular mobility in Special Transportation Areas (STAs) and highly developed urban areas is the expectation and assigns a mobility target that accepts a higher level of congestion in these situations. The targets set for Regional and District Highways in STAs and highly urbanized areas allow for lower vehicular mobility to better balance other objectives, including achieving a multimodal system. In these areas, traffic congestion will regularly reach levels where peak hour traffic flow is highly unstable and greater traffic congestion will occur. In order to better support state and local economic activity, targets for Freight Routes are set to provide for less congestion than would be acceptable for other state highways. Interstate Highways and Expressways are incompatible with slower traffic and higher level of vehicular congestion and therefore, STA designations will not be applied to these highway classifications. For Interstate and Expressway facilities it will be important to manage congestion to support regional and state economic development goals.

The mobility targets are contained in Tables 6 and 7 and in Action 1F.1. Tables 6 and 7 refer only to vehicle mobility on the state highway system. At the same time, it is recognized that other transportation modes and regional and local planning objectives need to be considered and balanced when evaluating performance, operation and improvements to the state highway system. Implementation of the Highway Mobility Policy will require state, regional and local agencies to assess mobility targets and balance actions within the context of multiple technical and policy objectives. While the mobility targets are important tools for assessing the transportation condition of the system, mobility is only one of a number of objectives that will be considered when planning transportation solutions.

The highway mobility targets are used in three distinct ways:

- Transportation System Planning: Mobility targets identify state highway mobility performance expectations and provide a measure by which the existing and future performance of the highway system can be evaluated. Plan development may necessitate adopting methodologies and targets that deviate from adopted mobility targets in order to balance regional and local performance expectations. For

1 purposes of compliance with OAR 660-012, the Transportation Planning Rule,
2 mobility targets are considered performance standards.
3

- 4 • Plan Amendments and Development Review: Mobility targets are used to review
5 amendments to comprehensive plans and land use regulations pursuant to the
6 Transportation Planning Rule (TPR) to assess if the proposed changes are
7 consistent with the planned function, capacity and performance standards of state
8 highway facilities. Unless the Oregon Transportation Commission has adopted an
9 alternative mobility target for the impacted facility, the mobility targets in Tables
10 6 and 7 are considered standards for purposes of determining compliance with
11 OAR 660-012-0060.
12
- 13 • Operations: Mobility targets assist in making traffic operations decisions such as
14 managing access and traffic control systems to maintain acceptable highway
15 performance.
16

17 The Highway Mobility Policy applies primarily to transportation and land use planning
18 decisions. By defining targeted levels of highway system mobility, the policy provides
19 direction for identifying (vehicular) highway system deficiencies. The policy does not,
20 however, determine what actions should be taken to address the deficiencies.
21

22 Mobility in the policy is measured using a volume to capacity ratio or v/c. This policy
23 also provides opportunities to seek Oregon Transportation Commission approval for
24 alternative mobility targets that are not v/c-based.
25

26 It is also important to note that regardless of the performance measure, v/c or other, the
27 Highway Mobility Policy recognizes the importance of considering the performance of
28 other modes of travel. While the policy does not prescribe mobility targets for other
29 modes of travel, it does allow and encourage ODOT and local jurisdictions to consider
30 mobility broadly – through multimodal measures or within the context of regional or
31 local land use objectives. Providing for better multimodal operations is a legitimate
32 justification for developing alternatives to established OHP mobility targets.
33

34 The Highway Mobility Policy will affect land use decisions through the requirements of
35 the TPR. The TPR requires that regional and local transportation system plans be
36 consistent with plans adopted by the Oregon Transportation Commission. The TPR also
37 requires that local governments ensure that comprehensive plan amendments, zone
38 changes and amendments to land use regulations that significantly affect a transportation
39 facility are consistent with the identified function, capacity and performance of the
40 affected state facility. The Highway Mobility Policy establishes ODOT's mobility targets
41 for state highways as the standards for system performance in compliance with the TPR
42 (OAR 660-012) and are to be used to determine significant affect specifically related to
43 Section -0060 of the TPR.
44

45 Policy 1F does not apply to highway design. Separate design mobility standards are
46 contained in ODOT's Highway Design Manual (HDM). While HDM design standards

1 and OHP mobility targets in Policy 1F may not be the same, ODOT's intention is to
2 continue to balance statewide mobility and economic development objectives with
3 community mobility, livability and economic development objectives through enhanced
4 coordination between planning and design. Where the Oregon Transportation
5 Commission adopts alternative mobility targets in accordance with this policy, they are
6 establishing an agreement with the local jurisdiction to manage and develop the state
7 system to the expected and planned levels of performance, consistent with the
8 jurisdiction's underlying planning objectives (as set out in local comprehensive plan
9 policy and land use regulations). However, coordination on exceptions to design mobility
10 standards may still be required.

11
12 ODOT's intention is that the mobility targets be used to identify system mobility
13 deficiencies over the course of a reasonable planning horizon. The planning horizon shall
14 be:

- 15
16 • At least 20 years for the development of state, regional and local transportation
17 plans, including ODOT's corridor plans; and
- 18
19 • The greater of 15 years or the planning horizon of the applicable local and
20 regional transportation system plans for amendments to transportation plans,
21 comprehensive plans or land use regulations.

22
23 ODOT measures vehicular highway mobility performance through v/c ratios. The v/c
24 ratio was selected after an extensive analysis of highway performance measures prior to
25 adoption of the 1999 Oregon Highway Plan. The review included the effectiveness of the
26 measure to achieve other policies (particularly OHP Policy 1B, Land Use and
27 Transportation), implications for growth patterns, how specifically ODOT should
28 integrate transportation policy with land use, flexibility for modifying targets, and the
29 effects of Portland metro area targets on the major state highways in the region. ODOT
30 uses v/c-based measures for reasons of application consistency and flexibility,
31 manageable data requirements, forecasting accuracy, and the ability to aggregate into
32 area-wide targets that are fairly easy to understand and specify. In addition, since v/c is
33 responsive to changes in demand as well as in capacity, it reflects the results of demand
34 management, land use and multimodal policies. However, it is recognized that there are
35 limitations in applying v/c, especially in highly congested conditions and in a multimodal
36 environment. OHP policies allow options for other measures, or combinations of
37 measures, to be considered.

38
39 Mobility targets are a measure by which the state assesses the functionality of a facility
40 and are used, along with consideration of other policy objectives, to plan for system
41 improvements. These mobility targets are shown in Table 6 and vary, depending on the
42 category of highway, the location of the facility – within a STA, MPO, UGB,
43 unincorporated community or rural lands – and the posted speed of the facility. Table 6
44 also reflects Policy 1B (Land Use and Transportation) and the state's commitment to
45 support increased density and development activities in urban areas. Through higher v/c
46 ratios and allowing consideration of alternative mobility targets, the state acknowledges

1 that it is appropriate and anticipated that certain areas will have more traffic congestion
2 because of the land use pattern that a region or local jurisdiction has committed to
3 through adopted local policy.

4
5 Separate mobility targets for the Portland metropolitan area have been included in the
6 policy (Table 7). These targets have been adopted with an understanding of the unique
7 context and policy choices that have been made by local governments in that area
8 including:

- 9
- 10 • A regional plan that links land use and transportation decisions and investments to
11 support land uses in urban centers and corridors and supports multi-modal
12 transportation options;
 - 13
14 • Implementation of Transportation System Management and Operations (TSMO)
15 strategies, including freeway ramp meters, real time traffic monitoring and
16 incident response to maintain adequate traffic flow; and
 - 17
18 • An air quality attainment/maintenance plan that relies heavily on reducing auto
19 trips through land use changes and increases in transit service.
- 20

21 The Portland Metro targets have been adopted specifically for the Portland metropolitan
22 area with a mutual understanding that these mobility targets better reflect the congestion
23 that already exists within the constraints of the metro area's transportation system and
24 which will not be alleviated by state highway improvements. The targets contained in
25 Table 7 are meant for interim use only. The Oregon Transportation Commission expects
26 the Portland Metro area to work with ODOT and stakeholders to explore a variety of
27 measures to assess mobility and to develop alternative targets that best reflect the
28 multiple transportation, land use and economic objectives of the region.

29
30 The mobility targets included in the Highway Mobility Policy must be used for the initial
31 deficiency analysis of state highways. However, where it can be shown that it is
32 infeasible or impractical to meet the targets, local governments may work with ODOT
33 and stakeholders to consider and evaluate alternatives to the mobility targets in Tables 6
34 and 7. Any variance from the targets in Tables 6 and 7 will require Oregon
35 Transportation Commission adoption. Increasingly, urban and urbanizing areas are facing
36 traffic and land use pressures due to population growth, aging infrastructure, and reduced
37 revenues for roadway and related infrastructure projects. In response to state funding
38 constraints and the need to balance multiple objectives, system management solutions
39 and enhancement of alternative modes of travel, rather than major highway
40 improvements, are increasingly relied upon to address congestion issues. Developing
41 mobility targets that are tailored to specific facility needs, consistent with local
42 expectations, values and land use context will need to be part of the solution for some
43 highway locations. Furthermore, certain urban areas may need area-specific targets to
44 better balance state and local policies pertaining to land use and economic development.
45 Examples where conditions may not match state mobility targets include metropolitan

1 areas, STAs, areas with high seasonal traffic, and areas constrained by the existing built
2 or natural environment.

3
4 Alternatives to the mobility targets and methodologies in the tables must be adopted
5 through an amendment to the OHP. The Oregon Transportation Commission must adopt
6 the new targets supported by findings that explain and justify the supporting
7 methodology.

8
9 Policy 1F is not the only transportation policy that influences how the state assesses the
10 adequacy of a highway facility and vehicle mobility is not the only objective. Facilitating
11 state, regional and local economic development, enhancing livability for Oregon's
12 communities, and encouraging multiple modes are also important policy areas that guide
13 state transportation investment and planning. Policy 1B recognizes that the state will
14 coordinate land use and transportation decisions to efficiently use public infrastructure
15 investments to enhance economic competitiveness, livability and other objectives.
16 Economic viability considerations help define when to make major transportation
17 investments (Policy 1G). Goal 4, Travel Alternatives, articulates the state's goal to
18 maintain a well-coordinated and integrated multimodal system that accommodates
19 efficient inter-modal connections for people and freight and promotes appropriate multi-
20 modal choices. Making decisions about the appropriate level of mobility for any given
21 part of the statewide highway system must be balanced by these, and other relevant OTP
22 and OHP policies.

23 24 25 **Policy 1F: Highway Mobility Policy**

26
27 *It is the policy of the State of Oregon to maintain acceptable and reliable levels of*
28 *mobility on the state highway system, consistent with the expectations for each facility*
29 *type, location and functional objectives. Highway mobility targets will be the initial tool*
30 *to identify deficiencies and consider solutions for vehicular mobility on the state system.*
31 *Specifically, mobility targets shall be used for:*

- 32
33 • *Identifying state highway mobility performance expectations for planning and*
34 *plan implementation;*
- 35
36 • *Evaluating the impacts on state highways of amendments to transportation plans,*
37 *acknowledged comprehensive plans and land use regulations pursuant to the*
38 *Transportation Planning Rule (OAR 660-12-0060); and*
- 39
40 • *Guiding operational decisions such as managing access and traffic control*
41 *systems to maintain acceptable highway performance.*

42
43 *Mobility targets for state highways, as established in this policy or as otherwise adopted*
44 *by the Oregon Transportation Commission as alternative mobility targets, are considered*
45 *the highway system performance standards in compliance with the TPR (OAR 660-012),*
46 *including applicability for actions that fall under Section -0060 of the TPR.*

Where it is infeasible or impractical to meet the mobility targets, acceptable and reliable levels of mobility for a specific facility, corridor or area will be determined through an efficient, collaborative planning process between ODOT and the local jurisdiction(s) with land use authority. The resulting mobility targets will reflect the balance between relevant objectives related to land use, economic development, social equity, and mobility and safety for all modes of transportation. Alternative mobility targets for the specific facility shall be adopted by the Oregon Transportation Commission as part of the OHP.

Oregon Transportation Commission adoption of alternative mobility targets through system and facility plans should be accompanied by acknowledgement in local policy that state highway improvements to further reduce congestion and improve traffic mobility conditions in the subject area are not expected.

Traffic mobility exemptions in compliance with the TPR do not obligate state highway improvements that further reduce congestion and improve traffic mobility conditions in the subject area.

Action 1F.1

Mobility targets are the measure by which the state assesses the existing or forecasted operational conditions of a facility and, as such, are a key component ODOT uses to determine the need for or feasibility of providing highway or other transportation system improvements. These mobility targets are shown in Table 6 and Table 7. For purposes of assessing state highway performance:

- Use the mobility targets below and in Table 6 when initially assessing all state highway sections located outside of the Portland metropolitan area urban growth boundary.
- Use the mobility targets below and in Table 7 when initially assessing all state highway sections located within the Portland metropolitan area urban growth boundary.
- For highways segments where there are no intersections, achieving the volume to capacity ratios in Tables 6 and 7 for either direction of travel on the highway demonstrates that state mobility targets are being met.
- For unsignalized intersections, achieving the volume to capacity ratios in Tables 6 and 7 for the state highway approaches indicates that state mobility targets are being met. In order to maintain safe operation of the intersection, non-state highway approaches are expected to meet or not to exceed the volume to capacity ratios for District/Local Interest Roads in Table 6, except within the Portland metropolitan area UGB where non-state highway approaches are expected to meet or not to exceed a v/c of 0.99.

- 1 • At signalized intersections other than interchange ramp terminals (see below), the
2 overall intersection v/c ratio is expected to meet or not to exceed the volume to
3 capacity ratios in Tables 6 and 7. Where Tables 6 and 7 v/c ratios differ by legs of
4 the intersection, the more restrictive of the volume to capacity ratios in the tables
5 shall apply. Where a state highway intersects with a local road or street, the
6 volume to capacity ratio for the state highway shall apply.
7
- 8 • Although an interchange serves both the mainline and the crossroad to which it
9 connects, it is important that the interchange be managed to maintain safe and
10 efficient operation of the mainline through the interchange area. The main
11 objective is to avoid the formation of traffic queues on off-ramps which back up
12 into the portions of the ramps needed for safe deceleration from mainline speeds
13 or onto the mainline itself. This is a significant traffic safety concern. The primary
14 cause of traffic queuing at off-ramps is inadequate capacity at the intersections of
15 the ramps with the crossroad. These intersections are referred to as ramp
16 terminals. In many instances where ramp terminals connect with another state
17 highway, the mobility target for the connecting highway will generally signify
18 that traffic backups onto the mainline can be avoided. However, in some instances
19 where the crossroad is another state highway or a local road, the mobility target
20 will not be a good indicator of possible future queuing problems. Therefore, the
21 better indication is a maximum volume to capacity ratio for the ramp terminals of
22 interchange ramps that is the more restrictive volume to capacity ratio for the
23 crossroad, or 0.85.
24
- 25 • At an interchange within an urban area the mobility target used may be increased
26 to as much as 0.90 v/c, but no higher than the target for the crossroad, if:
27
28 1. It can be determined, with a probability equal to or greater than 95
29 percent, that vehicle queues would not extend onto the mainline or into the
30 portion of the ramp needed to safely accommodate deceleration; and
31
32 2. An adopted Interchange Area Management Plan (IAMP) is present, or
33 through an IAMP adoption process, which must be approved by the
34 Oregon Transportation Commission.
35
- 36 • Because the ramps serve as an area where vehicles accelerate or decelerate to or
37 from mainline speeds, the mobility target for the interchange ramps exclusive of
38 the crossroad terminals is the same as that for the mainline. Metered on-ramps,
39 where entering traffic is managed to maintain efficient operation of the mainline
40 through the interchange area, may allow for greater volume to capacity ratios.
41

1 **Action 1F.2**

- 2
- 3 • Apply mobility targets over at least a 20-year planning horizon when developing
4 state, regional or local transportation system plans, including ODOT's corridor
5 plans.
 - 6
 - 7 • When evaluating highway mobility for amendments to transportation system
8 plans, acknowledged comprehensive plans and land use regulations, use the
9 planning horizons in adopted local and regional transportation system plans or a
10 planning horizon of 15 years from the proposed date of amendment adoption,
11 whichever is greater. To determine the effect that an amendment to an
12 acknowledged comprehensive plan or land use regulation has on a state facility,
13 the capacity analysis shall include the forecasted growth of traffic on the state
14 highway due to regional and intercity travel and consistent with levels of planned
15 development according to the applicable acknowledged comprehensive plan over
16 the planning period. Planned development, for the purposes of this policy, means
17 the amount of population and employment growth and associated travel
18 anticipated by the community's acknowledged comprehensive plan over the
19 planning period. The Oregon Transportation Commission encourages
20 communities to consider and adopt land use plan amendments that would
21 reallocate expected population and employment growth to designated community
22 centers as a means to help create conditions that increase the use of transit and
23 bicycles, encourage pedestrian activity, reduce reliance on single occupant vehicle
24 travel and minimize local traffic on state highways.
 - 25

26 **Action 1F.3**

27

28 In the development of transportation system plans or ODOT facility plans, where it is
29 infeasible or impractical to meet the mobility targets in Table 6 or Table 7, or those
30 otherwise approved by the Oregon Transportation Commission, ODOT and local
31 jurisdictions may explore different target levels, methodologies and measures for
32 assessing mobility and consider adopting alternative mobility targets for the facility.
33 While v/c remains the initial methodology to measure system performance, measures
34 other than those based on v/c may be developed through a multi-modal transportation
35 system planning process that seeks to balance overall transportation system efficiency
36 with multiple objectives of the area being addressed.

37

38 Examples of where state mobility targets may not match local expectations for a specific
39 facility or may not reflect the surrounding land use, environmental or financial conditions
40 include:

- 41
- 42 • Metropolitan areas or portions thereof where mobility expectations cannot be
43 achieved and where they are in conflict with an adopted integrated land use and
44 transportation plan for promoting compact development, reducing the use of
45 automobiles and increasing the use of other modes of transportation, promoting

efficient use of transportation infrastructure, improving air quality, and supporting greenhouse gas reduction objectives;

- When financial considerations or limitations preclude the opportunity to provide a planned system improvement within the planning horizon;
- When other locally adopted policies must be balanced with vehicular mobility and it can be shown that these policies are consistent with the broader goals and objectives of OTP and OHP policy;
- Facilities with high seasonal traffic;
- Special Transportation Areas; and
- Areas where severe environmental or land use constraints¹¹ make infeasible or impractical the transportation improvements necessary to accommodate planned land uses or to accommodate comprehensive plan changes that carry out the Land Use and Transportation Policy (1B).

Any proposed mobility target that deviates from the mobility targets in Table 6 or Table 7, or those otherwise approved by the Commission, shall be clear and objective and shall provide standardized procedures to ensure consistent application of the selected measure. The alternative mobility target(s) shall be adopted by the Oregon Transportation Commission as an amendment to the OHP. Consideration of alternative mobility targets shall be coordinated with other local jurisdictions in the affected corridor, consistent with OTC Policy 11- Public Involvement.

The Transportation Commission has sole authority to adopt mobility targets for state highways. It will be necessary for affected local jurisdictions to agree to the alternative mobility target for the state highway facility as part of a local transportation system plan and regional plan (MPO) as applicable. Findings shall demonstrate why the particular mobility target is necessary, including the finding that it is infeasible or impractical to meet the mobility targets in Table 6 or Table 7, or those otherwise approved by the Commission.

If alternative targets are needed but cannot be established through the system planning process prior to adoption of a new or updated transportation system plan, they should be identified as necessary and committed to as a future refinement plan work item with an associated timeframe for completion and adoption. In this case, the mobility targets in Table 6 or Table 7, or those otherwise approved by the Commission, shall continue to apply until the alternative mobility targets are formally adopted by the Oregon Transportation Commission.

¹¹Examples of severe environmental and land use constraints include, but are not limited to, endangered species, sensitive wetlands, areas with severe or unstable slopes, river or bay crossings, and historic districts.

1
2 Modifications to the mobility targets could include changing the hour measured from the
3 30th highest hour, using multiple hour measures, or considering weekday or seasonal
4 adjustments. Development of corridor or area mobility targets is also allowed. ODOT's
5 policy is to utilize a v/c based target and methodology as the initial measure, as this will
6 standardize and simplify implementation issues throughout the state. Where v/c-based
7 approaches may not meet all needs and objectives, developing alternative mobility targets
8 using non v-c-based measures, may also be pursued.

9
10
11
12 In support of establishing the alternative mobility target, the plan shall include feasible
13 actions for:

- 14
15 • Providing a network of local streets, collectors and arterials to relieve traffic
16 demand on state highways and to provide convenient pedestrian and bicycle
17 ways;
- 18
19 • Managing access and traffic operations to minimize traffic accidents, avoid traffic
20 backups on ramps, accommodate freight vehicles and make the most efficient use
21 of existing and planned highway capacity;
- 22
23 • Managing traffic demand and incorporating transportation system management
24 tools and information, where feasible, to manage peak hour traffic loads on state
25 highways;
- 26
27 • Providing and enhancing multiple modes of transportation; and
- 28
29 • Managing land use to limit vehicular demand on state highways consistent with
30 Policy 1B (Land Use and Transportation Policy).

31
32 The plan shall include a financially feasible implementation program and shall
33 demonstrate that the proposed mobility target(s) are consistent with and support locally
34 adopted land use, economic development, and multimodal transportation policy and
35 objectives. In addition, the plan shall demonstrate strong local commitment, through
36 adopted policy and implementation strategies, to carry out the identified improvements
37 and other actions.

38
39 ODOT understands that in certain areas of the state, achieving the established mobility
40 targets will be difficult and that regional and local policies must be balanced with
41 transportation system performance. ODOT is committed to work with MPOs and local
42 jurisdictions on system-level analysis of alternative mobility targets and to participate in
43 public policy-level discussions where balancing mobility and other regional and
44 community objectives can be adequately addressed.

45
46 In developing and applying alternative mobility targets and methodologies for facilities
47 throughout the state, ODOT will consider tools and methods that have been successfully
48 used previously for a particular facility and/or within a specific metropolitan area or

1 region. Specific mobility targets may vary from one community or area to another
2 depending on local circumstances. It is the objective of this policy to maintain
3 consistency in the selection and application of analysis and implementation
4 methodologies over time as they are applied to a specific facility or to a system of related
5 facilities within a defined community or region.

6
7 ODOT will provide guidance documents and will work with local jurisdictions and others
8 to apply best practices that streamline development of alternative mobility targets.

9
10 ***Action 1F.4***

11
12 Alternative mobility targets may also be developed for facilities where an investment has
13 been, or is planned to be, made that provide significantly more capacity than is needed to
14 serve the forecasted traffic demand based on the existing adopted local comprehensive
15 plan. In these situations, it is possible to preserve that excess capacity for traffic growth
16 beyond the established planning horizon or traffic growth resulting from local legislative
17 plan amendments or plan amendments associated with OAR 731-017.

18
19 ***Action 1F.5***

20
21 For purposes of evaluating amendments to transportation system plans, acknowledged
22 comprehensive plans and land use regulations subject to OAR 660-12-0060, in situations
23 where the volume to capacity ratio or alternative mobility target for a highway segment,
24 intersection or interchange is currently above the mobility targets in Table 6 or Table 7 or
25 those otherwise approved by the Oregon Transportation Commission, or is projected to
26 be above the mobility targets at the planning horizon, and transportation improvements
27 are not planned within the planning horizon to bring performance to the established
28 target, the mobility target is to avoid further degradation. If an amendment subject to
29 OAR 660-012-0060 increases the volume to capacity ratio further, or degrades the
30 performance of a facility so that it does not meet an adopted mobility target at the
31 planning horizon, it will significantly affect the facility unless it falls within the
32 thresholds listed below for a small increase in traffic.

33
34 In addition to the capacity increasing improvements that may be required to mitigate
35 impacts, other performance improving actions to consider include, but are not limited to:

- 36
37
 - System connectivity improvements for vehicles, bicycles and pedestrians.
 - 38
 - 39 • Transportation demand management (TDM) methods to reduce the need for
 - 40 additional capacity.
 - 41
 - 42 • Multi-modal (bicycle, pedestrian, transit) opportunities to reduce vehicle demand.
 - 43
 - 44 • Operational improvements to maximize use of the existing system.
 - 45
 - 46 • Land use techniques such as trip caps / budgets to manage trip generation.

1
2 In applying “avoid further degradation” for state highway facilities already operating
3 above the mobility targets in Table 6 or Table 7 or those otherwise approved by the
4 Oregon Transportation Commission, or facilities projected to be above the mobility
5 targets at the planning horizon, a small increase in traffic does not cause “further
6 degradation” of the facility.
7

8 The threshold for a small increase in traffic between the existing plan and the proposed
9 amendment is defined in terms of the increase in total average daily trip volumes as
10 follows:
11

- 12 • Any proposed amendment that does not increase the average daily trips by more
13 than 400.
14
- 15 • Any proposed amendment that increases the average daily trips by more than 400
16 but less than 1001 for state facilities where:
 - 17 ○ The annual average daily traffic is less than 5,000 for a two-lane highway
 - 18 ○ The annual average daily traffic is less than 15,000 for a three-lane
19 highway
 - 20 ○ The annual average daily traffic is less than 10,000 for a four-lane
21 highway
 - 22 ○ The annual average daily traffic is less than 25,000 for a five-lane
23 highway
24
- 25 • If the increase in traffic between the existing plan and the proposed amendment is
26 more than 1000 average daily trips, then it is not considered a small increase in
27 traffic and the amendment causes further degradation of the facility and would be
28 subject to existing processes for resolution.
29

30 In applying OHP mobility targets to analyze mitigation, ODOT recognizes that there are
31 many variables and levels of uncertainty in calculating volume-to-capacity ratios,
32 particularly over a specified planning horizon. After negotiating reasonable levels of
33 mitigation for actions required under OAR 660-012-0060, ODOT considers calculated
34 values for v/c ratios that are within 0.03 of the adopted target in the OHP to be considered
35 in compliance with the target. The adopted mobility target still applies for determining
36 significant affect under OAR 660-012-0060.
37

38 ***Action 1F.6***

39

40 When making recommendations to local governments about development permit
41 applications and potential actions for mitigation related to local development proposals
42 and criteria consider and balance the following:
43

- 44 • OHP mobility targets;
- 45
- 46 • Community livability objectives;

- State and local economic development objectives;
- Safety for all modes of travel; and
- Opportunities to meet mobility needs for all modes of travel.

Encourage local jurisdictions to consider OHP mobility targets when preparing local development ordinances and approval criteria to evaluate proposed development applications that do not trigger Section 660-012-0060 of the TPR.

Action 1F.7

Consider OHP mobility targets as guidance to ODOT's highway access management program. Balance economic development objectives of properties abutting state highways with transportation safety and access management objectives of state highways in a manner consistent with local transportation system plans and the land uses permitted in acknowledged local comprehensive plans.

When evaluating OHP mobility targets in access management decisions for unsignalized intersections consider the following:

- The highest priority for the use of OHP mobility targets in guiding access management practices is to address the state highway through traffic movements and the movements exiting the state highway facility.
- When evaluating traffic movements from an approach entering or crossing a state highway, the priority is to consider the safety of the movements. While a v/c ratio for a specific movement greater than 1.0 is an indication of a capacity problem, it does not necessarily mean the traffic movement is unsafe. Apply engineering practices and disciplines in the analysis and design of highway approaches to ensure traffic movements meet safety objectives for the program.

Private approaches at signalized intersections will be treated as all other signalized intersections under OHP Action 1F.1.

Action 1F.8

Consider OHP mobility targets when implementing operational improvements such as traffic signals and ITS improvements on the state highway system. The OHP mobility targets are meant to be used as a guide to compare the relative benefits of potential operational solutions rather than as a firm standard to be met. The main goal of operational projects is to improve system performance - which may include mobility, safety or other factors - from current or projected conditions.

Action 1F.9

Enhance coordination and consistency between planning and project design decisions whenever possible. Ensure that project development processes and design decisions take into account statewide mobility and economic objectives, including design standards, while balancing community mobility, livability and economic development objectives and expectations. Consider practical design principles that take a systematic approach to transportation solutions in planning and project development processes. Practical design principles strive to deliver the broadest benefits to the transportation system possible within expected resources.

Action 1F.10

The 2011 amendments to OHP Policy 1F and associated amendments to the TPR may lead to impacts in traffic mobility in specific corridors and on the overall state highway system that cannot be fully anticipated. ODOT shall evaluate the effectiveness of the policy in meeting broad objectives, the impacts on transportation system performance and safety, and any unintended consequences resulting from implementation within three years of adoption of this Action. Following the initial review, the mobility targets and associated policies will be reviewed periodically based on a schedule determined by the Oregon Transportation Commission.

Table 6: Volume to Capacity Ratio Targets for Peak Hour Operating Conditions

VOLUME TO CAPACITY RATIO TARGETS OUTSIDE METRO^{A,B,C,D}							
Highway Category	Inside Urban Growth Boundary					Outside Urban Growth Boundary	
	STA^E	MPO	Non-MPO Outside of STAs where non-freeway posted speed <= 35 mph, or a Designated UBA	Non-MPO outside of STAs where non-freeway speed > 35 mph, but <45 mph	Non-MPO where non-freeway speed limit >= 45 mph	Unincorporated Communities^F	Rural Lands
Interstate Highways	N/A	0.85	N/A	N/A	0.80	0.70	0.70
Statewide Expressways	N/A	0.85	0.80	0.80	0.80	0.70	0.70
Freight Route on a Statewide Highway	0.90	0.85	0.85	0.80	0.80	0.70	0.70
Statewide (not a Freight Route)	0.95	0.90	0.90	0.85	0.80	0.75	0.70
Freight Route on a Regional or District Highway	0.95	0.90	0.90	0.85	0.85	0.75	0.70
Expressway on a Regional or District Highway	N/A	0.90	N/A	0.85	0.85	0.75	0.70
Regional Highways	1.0	0.95	0.90	0.85	0.85	0.75	0.70
District / Local Interest Roads	1.0	0.95	0.95	0.90	0.90	0.80	0.75

Notes for Table 6

^A Unless the Oregon Transportation Commission has adopted an alternative mobility target for the impacted facility, the mobility targets in Tables 6 are considered standards for purposes of determining compliance with OAR 660-012, the Transportation Planning Rule.

^B For the purposes of this policy, the peak hour shall be the 30th highest annual hour. This approximates weekday peak hour traffic in larger urban areas. Alternatives to the 30th highest annual hour may be considered and established through alternative mobility target processes.

^C Highway design requirements are addressed in the Highway Design Manual (HDM).

^D See Action 1F.1 for additional technical details.

^E Interstates and Expressways shall not be identified as Special Transportation Areas.

^F For unincorporated communities inside MPO boundaries, MPO mobility targets shall apply.

Table 7: Volume to Capacity Ratio Targets within Portland Metropolitan Region

VOLUME TO CAPACITY RATIO TARGETS INSIDE METRO^{A,B}		
Location	Target	
	1st hour	2nd hour
Central City Regional Centers Town Centers Main Streets Station Communities	1.1	.99
Corridors Industrial Areas Intermodal Facilities Employment Areas Inner Neighborhoods Outer Neighborhoods	.99	.99
I-84 (<i>from I-5 to I-205</i>)	1.1	.99
I-5 North(<i>from Marquam Bridge to Interstate Bridge</i>)	1.1	.99
OR 99E (<i>from Lincoln Street to OR 224 Interchange</i>)	1.1	.99
US 26 (<i>from I-405 to Sylvan Interchange</i>)	1.1	.99
I-405 ^C (<i>I-5 South to I-5 North</i>)	1.1	.99
Other Principal Arterial Routes I-205 ^C I-84 (<i>east of I-205</i>) I-5 (<i>Marquam Bridge to Wilsonville</i>) ^C OR 217 US 26 (<i>west of Sylvan</i>) US 30 OR 8 (<i>Murray Blvd to Brookwood Avenue</i>) ^C OR 224 OR 47 OR 213 242 nd /US26 in Gresham OR 99W	.99	.99

Notes for Table 7: Deficiency thresholds for two hour peak operating conditions through the planning horizon for state highway sections within the Portland metropolitan area urban growth boundary.

^A Unless the Oregon Transportation Commission has adopted an alternative mobility target for the impacted facility, the mobility targets in Tables 7 are considered standards for purposes of determining compliance with OAR 660-012, the Transportation Planning Rule.

^B The volume-to-capacity ratios in Table 7 are for the highest two consecutive hours of weekday traffic volumes. The second hour is defined as the single 60-minute period either before or after the peak 60-minute period, whichever is highest. See Action 1.F.1 for additional technical details.

^C A corridor refinement plan, which will likely include a tailored mobility policy, is required by the Metro 2035 Regional Transportation Plan for this corridor.

Oregon Highway Plan Policy 1F Amendments

Draft Findings of Compliance with Oregon's Statewide Planning Goals

Statutory Background and Requirements for OHP Policy 1F Amendments

Oregon Highway Plan (OHP) Policy 1F amendments are driven by Chapter 432, 2011 Oregon Laws (Enrolled Senate Bill 795) from the 2011 Legislative Session, hereinafter referred to as SB 795. The statutory requirements for amendments to the Transportation Planning Rule (TPR) and OHP Policy 1F are:

SECTION 1. (1) The Legislative Assembly finds that the growth and economic development of this state requires an appropriate balance between economic development and transportation planning.

(2) The Legislative Assembly finds that the Oregon Transportation Commission and the Land Conservation and Development Commission have initiated a joint review of the transportation planning rule, the Oregon Highway Plan and the associated guidance documents.

SECTION 2. (1) The Oregon Transportation Commission and the Land Conservation and Development Commission shall jointly review the administrative rules, plans and associated guidance documents to better balance economic development and the efficiency of urban development with consideration of development of the transportation infrastructure in consultation with local governments and transportation and economic development stakeholders.

(2) The commissions shall consider revisions to the transportation planning rule (OAR 660-012), the Oregon Highway Plan and the associated guidance documents that streamline, simplify and clarify the requirements in the following areas:

(a) The planning requirements placed on zone changes that are consistent with locally adopted comprehensive plans.

(b) The development of practical methods that may be used to mitigate the transportation impacts of economic development.

(c) The planning requirements placed on zone changes within urban centers.

(d) The analysis required for transportation impacts of urban growth boundary changes.

(e) Clarification of planning periods and requirements for update of local transportation system plans.

(f) Thresholds for required analysis of transportation impacts of project proposals.

(g) The use of average trip generation rates.

(h) The development of mobility standards, including but not limited to volume to capacity ratios or corridor or area mobility standards.

(i) The analysis required for transportation impacts of comprehensive plan amendments that require improvements to avoid further degradation of transportation facility performance by the time of development.

SECTION 3. (1) The Land Conservation and Development Commission shall adopt revisions of the transportation planning rule consistent with the results of the review of the rule required in section 2 of this 2011 Act prior to January 1, 2012.

(2) The Oregon Transportation Commission shall adopt revisions to the Oregon Highway Plan consistent with the results of the review required in section 2 of this 2011 Act prior to January 1, 2012.

SECTION 4. The Oregon Transportation Commission and the Land Conservation and Development Commission shall report to the Legislative Assembly on the review of the transportation planning rule, the Oregon Highway Plan and the associated guidance documents and on the actions taken prior to February 1, 2012.

SECTION 5. This 2011 Act being necessary for the immediate preservation of the public peace, health and safety, an emergency is declared to exist, and the 2011 Act takes effect on its passage.

Findings of Compliance with State Agency Coordination Agreement

The Oregon Department of Transportation's (ODOT) State Agency Coordination Agreement (SAC) requires that the Oregon Transportation Commission (OTC) adopt findings of fact when adopting final modal system plans (OAR 731-015-0055). Pursuant to these requirements, the following findings and supporting information supplements the OTC adoption of amendments to OHP Policy 1F to implementing SB 795, and changes under the discretion of the OTC to meet legislative intent.

Coordination Procedures for Adopting Final Modal Systems Plans (OAR 731-015-0055)

(1) Except in the case of minor amendments, the Department shall involve DLCD, metropolitan planning organizations, and interested cities, counties, state and federal agencies, special districts and other parties in the development or amendment of a modal systems plan. This involvement may take the form of mailings, meeting, or other means that the Department determines are appropriate for the circumstances. The Department shall hold at least one public meeting on the plan prior to adoption.

(2) The Department shall evaluate and write draft findings of compliance with all applicable statewide planning goals.

(3) If the draft plan identifies new facilities which would affect identifiable geographic areas, the Department shall meet with the planning representatives of affected cities, counties and metropolitan planning organization to identify compatibility issues and the means of resolving them. These may include:

(a) Changing the draft plan to eliminate the conflicts;

(b) Working with the affected local governments to amend their comprehensive plans to eliminate the conflicts; or

(c) Identifying the new facilities as proposals which are contingent on the resolution of the conflicts prior to the completion of the transportation planning program for the proposed new facilities.

(4) The Department shall present to the Transportation Commission the draft plan, findings of compatibility for new facilities affecting identifiable geographic areas, and findings of compliance with all applicable statewide planning goals.

(5) The Transportation Commission, when it adopts a final modal systems plan, shall adopt findings of compatibility for new facilities affecting identifiable geographic areas and findings of compliance with all statewide planning goals.

(6) The Department shall provide copies of the adopted final modal systems plan and findings to DLCD, the metropolitan planning organizations, and others who request to receive a copy.

FINDING: The development of the proposed amendments to OHP Policy 1F was subject to an open and ongoing public and agency involvement process which included the Department of Land Conservation and Development (DLCD), metropolitan planning organizations (MPOs), Area Commissions on Transportation (ACTs), cities, counties, state and federal agencies, numerous modal and stakeholder interest groups, and input from interested citizens.

Coordination with DLCD regarding OHP Policy 1F amendments began in January 2011, with the appointment of the Joint Subcommittee on the TPR and OHP. The Joint Subcommittee comprised of Land Conservation and Development Commission (LCDC) members and OTC members who initiated a public process to consider significant stakeholder concerns that the TPR and OHP mobility standards were having consequences to broader state, regional and community objectives. The Joint Subcommittee developed recommendations for amendments to the TPR and OHP, which were considered and initiated by the respective Commissions at their April 2011 meetings. ODOT staff reported the OTC concurrence to initiate OHP Policy 1F amendments and the OHP work process at the April 21, 2011 LCDC Meeting.

Weekly coordination meetings with DLCD were held to ensure input in the OHP amendment process and ODOT coordination with related updates to TPR Section 0060. The initial framework for OHP Policy 1F amendments and draft policy revisions were shared with DLCD's Rules Advisory Committee (RAC) on the TPR over a series of meetings. An update and status report on the OHP amendment process was provided at each RAC meeting.

At the OTC September 21, 2011 Meeting, the OTC reviewed the draft OHP Policy 1F revisions and released the document for public review and input. A public hearing was held at the November 16, 2011 OTC Meeting to provide an additional opportunity for submitting public comments and the opportunity to testify directly with the OTC. Public comments were accepted until 5:00 p.m., November 21, 2011.

Broad notification of the availability of the draft amendments was distributed as described in the attached Record of Outreach. Written notification was sent to DLCD staff on September 29, 2011, with the request to distribute the information to the broad stakeholder list of those interested in both the TPR and OHP amendments. Written notice of the proposed OHP amendments was also distributed to the DLCD Director on October 11, 2011 as part of a broader state agency distribution (See Record of Outreach). Agency and stakeholder notification included the proposed OHP Policy 1F amendments, schedule for action and methods to provide comments. The public involvement and outreach for

the OHP Policy 1F amendments also followed OTC Policy 11 – Public Involvement Policy for statewide planning processes and the Statewide Transportation Improvement Program (STIP). The OHP Policy 1F amendments are to a modal systems plan and do not propose new transportation facilities.

As noted, a public hearing before the OTC was held November 16, 2011, providing additional opportunity for public testimony. The OTC will take action on the proposed Policy 1F revisions at their December 21, 2011 Meeting, which provides the opportunity for public comment. Notice of the public hearing and adoption date were distributed as part of the public review draft information. Notice of OTC action will also be distributed as part of the December OTC Meeting Packet.

The December 21, 2011 OTC Meeting packet will include the following attachments and information for OTC action:

- Revised OHP Policy 1F based on response to comments received during public review
- Overview of Supporting Information for OHP Policy 1F Revisions (Cover Sheet)
- Draft Findings of Compliance with Oregon’s Statewide Planning Goals
- OHP Policy 1F Revisions (Track Changes from Public Review Draft)
- Summary of Comments on OHP Policy 1F Public Review Draft and Proposed Actions
- Record of Outreach
- Public Review Period Comments (Complete Record, with Supplemental Information provided via CD)

Per the SAC, and customary ODOT practice, the final OHP Policy 1F amendments and final Findings of Compliance with Statewide Planning Goals will be distributed to DLCD, MPOs, interested participants from the policy revision process, and others who request a copy following adoption. The final documents will also be available on the OHP Project webpage (<http://www.oregon.gov/ODOT/TD/TP/OHP2011.shtml>) at the time of drafting of this document).

Findings of Compliance with Oregon’s Statewide Planning Goals

The State of Oregon has established 19 statewide planning goals to guide state, regional and local land use planning. The goals express the State’s policies on land use and related topics. The findings below are based on applicability and content of the proposed amendments to OHP Policy 1F.

1. **Citizen Involvement** - *The purpose of Goal 1 (660-015-0000(1)) is “To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process.”*

FINDING: The development and review of the proposed amendments to OHP Policy 1F provided extensive opportunities for citizen involvement as demonstrated more fully in the Record of Outreach which was presented to the OTC in December 2011. Outreach for the OHP Policy 1F amendments was in compliance with OTC Policy 11 - Public Involvement, which establishes public involvement objectives for the development and update of statewide plans, including modal plans, such as the OHP. Outreach activities were also in compliance with relevant policies in the Oregon Transportation Plan (OTP) including Goal 7, Coordination, Communication and Cooperation.

Highlights of the outreach during the OHP Policy 1F amendment process included:

- Public input initiated by the Joint Subcommittee on the TPR and OHP to develop the original work scope for the amendments.
- Consultation with the Rulemaking Advisory Committee established by DLCD for TPR amendments.
- Notification of public review to DLCD, other interested state agencies, MPOs, Oregon counties and cities, interested advisory committees, and interested project stakeholders.
- Presentations to numerous groups both before and during the public review period.
- Key outreach material was provided in Spanish. Additionally, a notification was posted on the project website for the availability of alternate formats of the materials.

The OHP amendments are in compliance with and supportive of Statewide Goal 1, Citizen Involvement.

2. **Land Use Planning** - *The purpose of Goal 2 (OAR 660-015-0000(2)) is “To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.”*

FINDING: The proposed amendments to OHP Policy 1F were developed in close coordination with DLCD to ensure compliance with the Statewide Land Use Planning program, with particular focus on OHP mobility objectives.

One of the statutory objectives for the OHP amendments established in SB 795 was to provide the appropriate balance between land use and transportation objectives. Stakeholder concerns that helped initiated this work found that existing policies gave precedence to transportation mobility over land use and other state and community objectives.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 2, Land Use Planning.

3. **Agricultural Lands** - *The purpose of Goal 3 (OAR 660-015-0000(3)) is “To preserve and maintain agricultural lands.”*

FINDING: The proposed amendments to OHP Policy 1F do not directly impact or hinder the overall objectives of Goal 3, Agricultural Lands. The OHP does not propose specific facilities that would encroach or impact agricultural lands.

By allowing flexibility for working with local communities and regions on mobility objectives for the area, OHP Policy 1F amendments may result in less of an identified need for new state transportation facilities or expanded footprints for existing facilities, thus lessening the overall impacts of transportation on agricultural lands.

Based on comments received from rural and agricultural stakeholders during the public review period, modifications were proposed (from the Public Review Draft) to the mobility target levels (in OHP Table 6) for areas outside of urban growth boundaries (UGBs) to further limit the potential impacts on rural and agricultural lands.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 3, Agricultural Lands.

4. **Forest Lands** – *The purpose of Goal 4 (OAR 660-015-0000(4)) is “To conserve forest lands by maintaining the forest land base and to protect the state’s forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.”*

FINDING: The proposed amendments to OHP Policy 1F do not directly impact or hinder the overall objectives of Goal 4, Forest Lands, which protects forest lands primarily for economic purposes. The OHP amendments do not contain specific facilities on or near forest lands.

By allowing flexibility for working with local communities and regions on mobility objectives for the area, OHP Policy 1F may result in less of an identified need for new state transportation facilities or expanded footprints for existing facilities, thus lessening the transportation impacts on forest lands.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 4, Forest Lands.

5. **Natural Resources, Scenic and Historic Areas, and Open Spaces** - *The purpose of Goal 5 (OAR 660-015-0000(5)) is “To protect natural resources and conserve scenic and historic areas and open spaces.”*

FINDING: The proposed amendments to OHP Policy 1F do not directly impact or hinder the overall objectives of Goal 5, Natural Resources, Scenic and Historic Areas, and Open Spaces. The OHP amendments do not contain specific facilities on or near lands protected by Goal 5.

By allowing flexibility for working with local communities and regions on mobility objectives for the area, OHP Policy 1F may result in less of an identified need for new state transportation facilities or expanded footprints for existing facilities, thus lessening the transportation impacts on Goal 5 resources.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 5, Natural Resources, Scenic and Historic Areas, and Open Spaces.

6. **Air, Water and Land Resources Quality** - *The purpose of Goal 6 (OAR 660-015-0000(6)) is “To maintain and improve the quality of the air, water and land resources of the state.”*

FINDING: One of the primary objectives in the proposed amendments to OHP Policy 1F is to better facilitate mobility objectives and measures that consider and balance a broader range of goals for the transportation system and for communities. This includes broader OTP and OHP objectives considering resource impacts from transportation. For a number of years, stakeholders have pointed to the existing OHP Policy 1F as being too focused and unyielding towards vehicle mobility and encouraging development on the edge of urban areas. The new policy amendments allow a more multimodal perspective to mobility considerations to lessen reliance on one single mode of transportation. These policy amendments also allow better consideration for enhanced development in existing urban areas. These considerations and tradeoffs are anticipated to promote more efficient use of resources overall, including for land development and to enhance air quality and promote greenhouse gas objectives.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 6, Air, Water and Land Resources Quality.

7. **Areas Subject to Natural Hazards** - *The purpose of Goal 7 (OAR 660-015-0000(7)) is “To protect people and property from natural hazards.”*

FINDING: The proposed amendments to OHP Policy 1F are not directly applicable to Goal 7, Areas Subject to Natural Hazards. However, the policy does recognize the constraints to transportation improvements associated with physical limitations and natural hazards.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 7, Areas Subject to Natural Hazards.

8. **Recreational Needs** - *The purpose of Goal 8 (OAR 660-015-0000(8)) is “To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.”*

FINDING: The proposed amendments to OHP Policy 1F do not directly impact or hinder the objectives of Goal 8, Recreational Needs. The OHP amendments do not contain specific facilities on or near lands covered by Statewide Goal 8.

By allowing flexibility for working with local communities and regions on mobility objectives for the area, OHP Policy 1F may result in less of an identified need for new state transportation facilities or expanded footprints for existing facilities, thus lessening the transportation impacts on lands identified for recreational needs.

The OHP Policy 1F amendments are in compliance with Statewide Goal 8, Recreational Needs.

9. **Economic Development** - *The purpose of Goal 9 (OAR 660-015-0000(9)) is “To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon’s citizens.”*

FINDING: The proposed amendments to OHP Policy 1F have a considerable foundation in facilitating economic development opportunities for Oregon. SB 795 includes statutory findings that “the growth and economic development of this state requires an appropriate balance between economic development and transportation planning.” Many of the changes proposed in the OHP amendments, in close coordination with the revisions proposed in the TPR, seek to enhance and promote economic opportunities for Oregonians.

Specific revisions include better consideration of economic development objectives with transportation mobility, lessening analysis and mitigation burdens for smaller developments that have a lower risk on transportation system mobility, and permitting increased levels of development by working with local jurisdictions to balance mobility and development considerations in a specific area.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 9, Economic Development.

10. **Housing** - *The purpose of Goal 10 (OAR 660-015-0000(10)) is “To provide for the housing needs of citizens of the state.”*

FINDING: The proposed amendments to OHP Policy 1F are not directly applicable to Goal 10, Housing. However, housing needs may be one objective that comes into consideration when working with local jurisdictions on specific mobility and development objectives for an area.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 10, Housing.

- 11. Public Facilities and Services** - *The purpose of Goal 11 (OAR 660-015-0000(11)) is “To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.”*

FINDING: Public facilities and services are an important consideration of the proposed amendments to OHP Policy 1F. A statutory requirement of SB 795 is to “better balance economic development and the efficiency of urban development with consideration of development of the transportation infrastructure...”

The proposed amendments to OHP Policy 1F do not propose specific facility improvements, but do have a role in identifying transportation system needs. This includes working with local jurisdictions to meet and/or refine mobility objectives through development of their Transportation System Plans (TSPs), consistent with the adopted comprehensive plan for the area. The enhanced flexibility in OHP Policy 1F provides additional context for working with local jurisdictions on timely, orderly and efficient transportation facilities and services consistent with the local comprehensive plan.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 11, Public Facilities and Services.

- 12. Transportation** - *The purpose of Goal 12 (OAR 660-015-0000(12)) is “To provide and encourage a safe, convenient and economic transportation system.”*

Transportation Planning Rule, OAR 660-012

Statewide Planning Goal 12 (Transportation) and its administrative rule (Transportation Planning Rule) have several purposes for assuring statewide planning goals are considered in transportation planning efforts. The TPR is a broad administrative rule that covers a range of applications, some of which are summarized below:

- The preparation and coordination of transportation system plans
- Coordination with federally required transportation plans in metropolitan areas
- Elements of TSPs
- Complying with statewide planning goals
- Determination of transportation needs
- Evaluation and selection of transportation alternatives
- Transportation financing programs
- Implementation of TSPs
- Transportation project development
- Timing and adoption of TSPs
- Plan and land use regulation amendments

- Transportation improvements on rural lands
- Exceptions for improvements on rural lands

The proposed amendments to OHP Policy 1F are to a single policy of the broader modal transportation system plan, thus not all sections and objectives of the TPR are applicable to the proposal as discussed below.

- ***Purpose, OAR 660-012-0000***

Many of the legislative and policy objectives of the proposed amendments to OHP Policy 1F reflect aspects of the TPR purpose statement. Section (1) of the purpose statement is included below for context.

(1) This division implements Statewide Planning Goal 12 (Transportation) to provide and encourage a safe, convenient and economic transportation system. This division also implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in close coordination with urban and rural development. The purpose of this division is to direct transportation planning in coordination with land use planning to:

- (a) Promote the development of transportation systems adequate to serve statewide, regional and local transportation needs and the mobility needs of the transportation disadvantaged;*
- (b) Encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation;*
- (c) Provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation;*
- (d) Facilitate the safe, efficient and economic flow of freight and other goods and services within regions and throughout the state through a variety of modes including road, air, rail and marine transportation;*
- (e) Protect existing and planned transportation facilities, corridors and sites for their identified functions;*
- (f) Provide for the construction and implementation of transportation facilities, improvements and services necessary to support acknowledged comprehensive plans;*
- (g) Identify how transportation facilities are provided on rural lands consistent with the goals;*
- (h) Ensure coordination among affected local governments and transportation service providers and consistency between state, regional and local transportation plans; and*
- (i) Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities.*

FINDINGS: Recognizing the relationship between OHP Policy 1F and the TPR, the

proposed amendments to OHP Policy 1F were developed in close coordination with DLCD and their related work to update the TPR. Coordination activities included Joint Subcommittee Meetings with Commissioners from both the OTC and LCDC, staffing assistance and review with the TPR Rules Advisory Committee, weekly coordination meetings between ODOT and DLCD staff, coordinated outreach events on the OHP and TPR amendments, among other actions.

Based on stakeholder input through a public process initiated by the Joint Subcommittee and the legislative findings in SB 795, OHP mobility standards were found to be out of balance with broader transportation and community objectives. A broad range of stakeholders and the State Legislature expressed concerns that existing OHP Policy 1F gives preference to transportation mobility, especially for vehicles, at the detriment of other economic, community development and livability objectives. Policy 1F revisions have been developed to better support acknowledged comprehensive plans, which was a legislative finding from SB 795.

The OHP Policy 1F amendments are designed to better balance broader state, regional and local goals and objectives, including for economic development, community development and multimodal considerations. To every extent possible, precautions are taken to protect safety of the transportation system as a primary objective.

While increased congestion can cause concerns and lead to issues, especially in urban areas with high levels of congestion, the revised policies provide opportunities to better accommodate transportation options and multimodal solutions that make transportation more convenient to all users of the transportation system, including the transportation disadvantaged. These options also strive to mitigate congestion concerns to the extent possible. The policy revisions promote transportation demand management and operational improvements that enhance the efficiency of the existing or improved transportation system.

The proposed revisions better achieve a clear TPR objective to balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation.

While freight may be impacted from policies that recognize more congestion on state facilities given growth in population and travel, and constrained financial resources, the revised policies continue to recognize the importance of state facilities for freight transportation. The revised mobility policy carries forward greater mobility expectations on higher classified facilities and designated freight routes. OHP Policy 1F continues to acknowledge and consider other OHP policies regarding the importance of facilities best serving their respective functions given current realities and future expectations. To reflect this key concern, freight stakeholders were notified of the potential OHP Policy 1F amendments through several outreach methods and participated in the revisions through the TPR Rules Advisory Committee.

As is the case under existing OHP policies, amendments build off of local planning processes for consideration of statewide mobility objectives. The development of mobility targets that are different than those adopted in the existing OHP must be considered as part of a facility planning process, or as more often is the case, a local transportation system planning process such as development of a TSP. This assures coordination with impacted parties and opportunities for comments and input into the overall planning process.

- ***Definitions, OAR 660-012-0005***

FINDING: Section 0005 of the TPR establishes definitions. The proposed amendments to OHP Policy 1F are not directly applicable to this section.

- ***Transportation Planning, OAR 660-012-0010***

FINDING: Section 0010 of the TPR recognizes that ODOT's TSP is comprised of a number of elements as described in the Department's State Agency Coordination Program. The SAC states, "(1)(a) The state TSP shall include the state transportation policy plan, modal systems and transportation facility plans as set forth in OAR 731, Division 15." The OHP is a component of the state transportation system plan, along with the statewide policy plan (OTP), other modal/topic plans and facility plans.

- ***Preparation and Coordination of Transportation System Plans, OAR 660-012-0015***

Section 0015 of the TPR conveys that the state TSP shall include the state transportation policy plan, modal systems plans and transportation facility plans.

FINDING: The OHP is a modal transportation plan under the OTP. As noted above, the modal systems plans and transportation facility plans are separate documents that together make up the state TSP.

- ***Coordination with Federally-Required Regional Transportation Plans in Metropolitan Areas, OAR 660-012-0016***

FINDING: The proposed amendments to OHP Policy 1F are not applicable to Section 0016 of the TPR.

- ***Elements of Transportation System Plans, OAR 660-012-0020***

Section 0020 of the TPR stipulates that a TSP "shall establish a coordinated network of transportation facilities adequate to serve state, regional and local transportation needs and that the TSP will include a description of the type or functional classification of planned facilities and services and their planned capacities and performance standards...."

FINDING: The amendments to OHP Policy 1F propose changes to performance

standards on state facilities in compliance with the TPR as described below.

In order to better facilitate discussions on mobility objectives at the system and facility planning level, the proposed amendments to OHP Policy 1F change the terminology of mobility standards to mobility targets. This change better promotes ODOT's existing ability to work with local communities and stakeholders on reasonable and feasible mobility objectives given the physical, financial and community characteristics of an area. However, for the purposes of compliance with the TPR (OAR 660-012), the revised policies clearly state that the mobility targets are considered standards. This policy element allows the OHP to better promote and facilitate mobility conversations with the context of a given area, while fulfilling the requirements of the TPR that may require a solid baseline to work from.

The OHP Policy 1F amendments propose changes to the mobility target levels for portions of the state highway system (OHP Table 6). These revisions recognize the changes in transportation that has occurred since Table 6 was first developed in 1999, including increased travel statewide and on many portions of the state system, and a more challenging funding environment for transportation improvements. The revisions to Table 6 allow for a more reasonable baseline from which to start mobility conversations, rather than spending time on mobility expectations that may be unattainable for a given area. However, the proposed changes to Table 6 now keep existing mobility target levels for areas outside of UGBs based on comments received during public review. This change recognizes the rural context of state facilities outside of UGBs and the intent of SB 795 to focus on better achieving community development objectives inside of UGBs.

Another change in the proposed amendments to OHP Policy 1F responds directly to the intent of the recommendations of the Joint Subcommittee on the TPR and OHP to exempt proposals with small increases in traffic. Concerns were raised that existing TPR and OHP processes provide that an increase of a single trip qualifies as a significant affect in some situations, triggering full review, analysis and mitigation. The proposed change provides relief for smaller plan amendments that are a lower risk to the function of the state system. Areas that are not approaching the congestion levels of established mobility targets (including many rural state highways) should have room under existing mobility targets to allow for minor increases in traffic without triggering TPR analysis, as is current practice, regardless of this new OHP policy direction.

- ***Complying with the Goals in Preparing Transportation System Plans; Refinement Plans, OAR 660-012-0025***

FINDING: The majority of TPR Section 0025 does not apply to the proposed amendments to OHP Policy 1F because the OHP does not include any proposals for specific transportation facilities, services or major improvements. However, TPR Section 0025, Subsection 2 states "Findings of compliance with applicable statewide planning goals and acknowledged comprehensive plan policies and land use

regulations shall be developed in conjunction with the adoption of the TSP.” This requirement is addressed through development of this document and supporting information.

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

Section 30 of the TPR requires that TSPs identify transportation needs relevant to the planning area and the scale of the transportation network being planned including state, regional and local transportation needs.

FINDING: The proposed amendments to OHP Policy 1F focus on one specific OHP policy and are not a full plan update. While the OHP Policy revisions will impact how needs are identified for state facilities in more refined planning work, the amendments do not require a determination of needs as part of the overall State TSP per this amendment.

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

TPR Section 0035 stipulates that TSPs shall be based upon evaluation of potential impacts of system alternatives.

FINDING: The proposed amendments to OHP Policy 1F do not address changes or amendments to specific system alternatives and are not applicable to TPR Section 0035.

- ***Transportation Financing Program, OAR 660-012-0040***

FINDINGS: Section 0040 of the TPR applies to a transportation financing program for urban areas over 2,500. The proposed amendments to OHP Policy 1F are not applicable to Section 0040 of the TPR.

- ***Implementation of the Transportation System Plan, OAR 660-012-0045***

FINDING: TPR Section 0045 addresses actions required by local governments to implement its TSP. TPR Section 0045 does not directly apply to the proposed amendments to OHP Policy 1F before the OTC. However, implementation of revised policy direction has been identified as a critical next step by the Department and in stakeholder comments.

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

FINDING: TPR Section 0050 does not apply to the proposed amendments to OHP Policy 1F. The OHP does not include specific transportation projects.

- ***Timing of Adoption and Update of Transportation System Plans; Exemptions, OAR 660-012-0055***

FINDING: Section 0055 of the TPR covers the adoption, update and exemptions of local TSPs and does not apply to the proposed amendments to OHP Policy 1F.

- ***Plans and Land Use Regulation Amendments, OAR 660-012-0060***

FINDING: Section 0060 of the TPR addresses the coordination and review that must occur when a local government considers an amendment to its comprehensive plan and land use regulations. The proposed amendments to OHP Policy 1F do not invoke consideration of a local plan amendment or regulation, so this provision is not applicable. However, SB 795 required LCDC to also amend the provisions of TPR Section 0060. Given the close connection between TPR Section 0060 and OHP amendments, these proposed changes to OHP Policy 1F were coordinated closely with the DLCDC and stakeholder groups associated with those changes to ensure consistency and compliance between the two policy areas.

- ***Transportation Improvements on Rural Lands, OAR 660-012-0065 and OAR 660-012-0070***

FINDING: TPR Sections 0065 and 0070 apply to transportation improvements on rural lands. These proposed amendments to OHP Policy 1F do not propose new transportation improvements. These sections of the TPR are not applicable.

- 13. Energy Conservation - The purpose of Goal 13 (OAR 660-015-0000(13)) is “To conserve energy.” Goal 13 declares that “land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles.”***

FINDING: Many stakeholders viewed the existing OHP mobility standards as a hindrance to state and local community objectives to increase development intensities in urban areas, provide multimodal transportation options and encourage operational or demand management solutions to transportation issues. These actions are often the focus of planning work seeking to promote energy conservation by reducing reliance on single occupancy vehicles and providing travel options. Input on the existing TPR and OHP found the two policy areas were making it more difficult to increase development intensities with urban areas and provide multimodal travel options. The proposed amendments to Policy 1F bring broader multimodal and energy objectives into better balance with transportation mobility for vehicles.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 13, Energy Conservation.

- 14. Urbanization – The purpose of Goal 14 (OAR 660-015-0000(14)) is “To provide for an orderly and efficient transition from rural to urban land use, to accommodate***

urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.”

FINDING: Many stakeholders viewed the existing OHP mobility standards as a hindrance to objectives to better accommodate development in urban areas. The stakeholders conveyed that needing to meet what was perceived as an inflexible congestion standard for transportation increased development pressures at the edge of urban growth boundaries and increased pressures to expand urban growth boundaries. The existing policies were also viewed as hindering community economic and livability objectives by hindering multimodal objectives for transportation. The proposed amendments to OHP Policy 1F help to better balance community development and livability objectives with transportation mobility performance.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 14, Urbanization.

- 15. Willamette River Greenway** - *The purpose of Goal 15 (OAR 660-015-0005) is “To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.”*

FINDING: The proposed amendments to OHP Policy 1F do not plan for specific uses on lands protected in the Willamette River Greenway. Overall the OHP Policy 1F amendments may help promote this goal by providing flexibility for transportation options that could limit impacts on lands within the Willamette River Greenway.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 15, Willamette River Greenway.

- 16. Estuarine Resources** - *The purpose of Goal 16 (OAR 660-015-0010(1)) is “To recognize and protect the unique environmental, economic, and social values of each estuary and associated wetlands; and to protect, maintain, where appropriate develop, and where appropriate restore the long-term environmental, economic, and social values, diversity and benefits of Oregon’s estuaries.”*

FINDING: The proposed amendments to OHP Policy 1F do not propose any land uses that would impact estuarine resources. Overall the proposed OHP Policy 1F amendments may help promote this goal by providing flexibility for transportation options that could limit impacts on estuarine resources.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 16, Estuarine Resources.

- 17. Coastal Shorelands** - *The purpose of Goal 17 (OAR 660-015-0010(2)) is “To conserve, protect, where appropriate, develop and where appropriate restore the resources and benefits of all coastal shorelands, recognizing their value for*

protection and maintenance of water quality, fish and wildlife habitat, water-dependent uses, economic resources and recreation and aesthetics. The management of these shoreland areas shall be compatible with the characteristics of the adjacent coastal waters; and to reduce the hazard to human life and property, and the adverse effects upon water quality and fish and wildlife habitat, resulting from the use and enjoyment of Oregon's coastal shorelands."

FINDING: The proposed amendments to OHP Policy 1F do not propose any land uses that would impact coastal shoreland resources. Overall the OHP Policy 1F amendments may help promote this goal by providing flexibility for transportation options that could limit impacts on coastal shorelands.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 17, Coastal Shorelands.

- 18. Beaches and Dunes** - *The purpose of Goal 18 (OAR 660-015-0010(3)) is "To conserve, protect, where appropriate develop, and where appropriate restore the resources and benefits of coastal beach and dune areas; and to reduce the hazard to human life and property from natural or man-induced actions associated with these areas."*

FINDING: The proposed amendments to OHP Policy 1F do not propose any land uses that would impact beach and dune resources. Overall the OHP Policy 1F amendments may help promote this goal by providing flexibility for transportation options that could limit impacts to beaches and dunes.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 18, Beaches and Dunes.

- 19. Ocean Resources** - *The purpose of Goal 19 (OAR 660-015-0010(4)) is "To conserve marine resources and ecological functions for the purpose of providing long-term ecological, economic, and social value and benefits to future generations."*

FINDING: The proposed amendments to OHP Policy 1F do not propose any land uses that would impact ocean resources. Overall the OHP Policy 1F amendments may help promote this goal by providing flexibility for transportation options that could limit impacts on ocean resources.

The OHP Policy 1F amendments are in compliance with and supportive of Statewide Goal 19, Ocean Resources.

Conclusion

The OHP is the state's modal transportation plan for state highways. The proposed OHP Policy 1F amendments were developed, as required, to be consistent with Chapter 432,

2011 Oregon Laws (Enrolled SB 795). The amendments were considered and developed in close coordination with LCDC and the DLCD over the last 11 months, including work scope development. The amendments were developed in compliance with OAR 731-015-055, Coordination Procedures for Adopting the Final Modal Systems Plans and the Oregon Transportation Commission's Policy 11 – Public Involvement Policy. These Draft Findings of Compliance with Statewide Planning Goals and supporting information were presented to the OTC for consideration and action at their December 21, 2011 Meeting.

As a component of the state's Transportation System Plan, the OHP amendments must be in compliance with statewide planning goals. Based on the analysis of each statewide goal represented by the findings in this report, the OHP Policy 1F amendments are found to be in compliance with all 19 statewide planning goals.

Oregon Highway Plan (OHP) – Policy 1F Revisions (Mobility Standards)

Record of Outreach

Public Review Period: September 21, 2011 to November 21, 2011

Presentations¹	
Agency/Committee/Interest Group	Presentation Date
Cascades West Area Commission on Transportation (CWACT)	September 22
Metro – Transportation Policy Alternatives Committee (TPAC)	September 23
South East Area Commission on Transportation (SEACT)	September 26
Transportation Planning Rule (TPR) - Rulemaking Advisory Committee (RAC), Status Report from Past Presentations	September 26
Clackamas County Jurisdictions Outside Metro	September 28
Lower John Day Area Commission on Transportation	October 3
Mid-Willamette Valley Area Commission on Transportation (MWACT)	October 6
North East Area Commission on Transportation (NEACT)	October 6
Lane County Area Commission on Transportation (LaneACT)	October 12
Joint Policy Advisory Committee on Transportation (JPACT)	October 13
Quarterly Metropolitan Planning Organization (MPO)/Transit District Meeting	October 14
120-Day Club (Land Use Attorney Group)	October 19
Metro Technical Advisory Committee (MTAC)/TPAC Joint Meeting	October 19
Clackamas Transportation Advisory Committee	October 25
ODOT/ Department of Land Conservation and Development (DLCD)/Business Oregon Senior Staff Meeting	October 27
CWACT/Corvallis MPO Technical Advisory Committee (TAC)	October 28
Northwest Oregon Area Commission on Transportation (NWACT)	November 3
MPO Consortium	November 4
South Central Oregon Area Commission on Transportation	November 4
DLCD Local Officials Advisory Committee	November 7
Salem-Keizer Area Transportation Study (SKATS) TAC	November 8
Oregon Transportation Safety Advisory Committee	November 8
Central Oregon Area Commission on Transportation (COACT)	November 10
Central Oregon Workshop	November 10
Rogue Valley Area Commission on Transportation (RVACT)	November 10
Joint Subcommittee on the TPR and OHP	November 15
Oregon Transportation Commission Meeting – Public Hearing	November 16
Business Oregon Field Staff	November 17
Notifications^{1, 2, 3}	
Agency/Committee/Interest Group	Notification Date
Oregon Freight Advisory Committee (OFAC)	September 28 October 25
Oregon Public Transportation Advisory Committee (PTAC)	September 28

ODOT website posting	September 29
TPR RAC	September 29
Joint Subcommittee on TPR and OHP – Interested Parties List	September 29
League of Oregon Cities	September 29
Association of Oregon Counties	September 29
MPO Contacts	September 29
Oregon Transit District Contacts	September 29
South West Area Commission on Transportation (SWACT) – Meeting Cancelled	October 3
Federal Highway Administration (FHWA)	October 5
Oregon Bicycle and Pedestrian Advisory Committee (OBPAC)	October 5
Oregon Tribal Governments	October 11
Federal and State Natural Resource Agencies (SAFETEA-LU Consultation Focus Area) <ul style="list-style-type: none"> • Bureau of Land Management • National Marine Fisheries Services • Oregon Department of Agriculture • Oregon Department of Energy • Oregon Department of Environmental Quality • Oregon Department of Forestry • Oregon Department of Land Conservation and Development • Oregon Department of State Lands • Oregon Department of Water Resources • Oregon Parks and Recreation Department • Oregon Water Resources Enhancement Board • US Army Corps of Engineers • US Department of Agriculture, Forest Service • US Environmental Protection Agency • US Fish and Wildlife Services 	October 11

Notes:

1 – Information and presentations were provided to a number of groups prior to the public review period (prior to September 21, 2011). Presenters included a combination of ODOT and DLCD staff.

2 – Some agencies/committees/interest groups requested information only, no presentation.

3 – Information regarding how to obtain the OHP revision documents in alternate formats was posted on the project website: <http://www.oregon.gov/ODOT/TD/TP/OHP2011.shtml>. A Spanish version of the OHP Amendment Fact Sheet was developed.

SUMMARY OF COMMENTS ON OHP POLICY 1F PUBLIC REVIEW DRAFT AND PROPOSED ACTIONS

Background

The Summary Matrix below includes a list of the comments and recommendations received in response to the Oregon Highway Plan (OHP) Policy 1F, September 21, 2011 Public Review Draft. While all correspondence is listed, not every comment within the individual email or letter is reflected in the Summary Matrix. However, an effort has been made to capture those comments that included suggested revisions to Draft Policy 1F or direction, or provided recommendations to the Commission for future consideration. The “Comment Summary” column includes only paraphrased comments; refer to the “source” documents attached for the full text. The “Proposed Action” column indicates what action is recommended to address the comment(s) either through Policy 1F revisions or through future work and guidance document revisions. The “Proposed Action” column also notes if changes are not recommended due to inconsistency with overall policy direction from Senate Bill (SB) 795 or the Joint Subcommittee on the Transportation Planning Rule (TPR) and OHP. Primary themes for potential next steps are highlighted in the “Overview of Supporting Information for OHP Policy 1F Revisions.” The “Draft Findings of Compliance with Oregon’s Statewide Planning Goals” provide additional detail on procedural items or comments that correspond to consistency with existing planning goals.

Summary Matrix

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
1. Elizabeth Graser-Lindsey, 10/3/11 Email	Concern expressed that the exemption for a small increase in traffic (OHP Action 1F.5) will result in detrimental incremental/cumulative effects;	OHP Action 1F.5, Multiple Sections	Add language to the Background Section to acknowledge the trade-offs between mobility and broader community objectives. Add new OHP Action 1F.10 to evaluate

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	<p>Concern that streamlining analysis is a determinant to public input; Concern on moving away from v/c as a measure.</p>		<p>impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. Provide further direction and clarification in OHP Mobility Standard Guidelines regarding the trade-offs between multiple objectives as established in policy direction.</p>
<p>2. City of Redmond, 10/4/11 Letter</p>	<p>Revised policy is a step in the right direction. Recommends the following:</p> <p>Clarify implementation aspects for a “small increase” in traffic in OHP Action 1F.5.</p>	OHP Action 1F.5	<p>Further amend OHP Action 1F.5 to clarify that <i>total</i> average daily trip thresholds apply. Provide additional clarification in OHP Mobility Standard Guidelines and ODOT’s Development Review Guidelines.</p>
	<p>Clarify which mobility target is appropriate for egressing traffic (OHP Action 1F.7 implies only through movements and ingressing traffic are subject to OHP Tables 6 and 7). Include a horizon year for measurement of the target.</p>	OHP Action 1F.7	<p>Provide clarification in OHP Mobility Standard Guidelines and ODOT’s Development Review Guidelines. Specific application and clarification regarding access management and private approaches are currently being considered/developed through work</p>

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
			on Division 51 amendments and implementation of Senate Bill (SB) 264 (2011).
3. Ron Irish, City of Albany, 10/31/11Email	<p>Supportive of majority of changes; suggests the following:</p> <p>The OHP should recognize the (Draft TPR) Multimodal Mixed Use Area (MMA) exemption for development proposals. Concerns that mobility targets may be problem for development applications even if removed as an impediment for plan amendments in MMAs through the TPR.</p>	Multiple Sections	Provide clarification in guideline documents (ODOT Development Review Guidelines, OHP Mobility Standard Guidelines) to ensure that approach road decisions meet the intent of the MMA exemption being considered as part of the TPR amendments.
4. Washington County, 11/9/11 Letter	<p>Supportive of majority of changes with the following comments/suggestions:</p> <p>Suggests providing more comprehensive analysis of overall OHP, re: what kinds of improvements correspond to the (revised) mobility targets and the cost of meeting the targets (Potential statewide equity issue for</p>	OHP Tables 6 and 7	Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. Further evaluation of target levels could be considered as a next step.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	transportation funding priorities).		
	Add language that encourages setting the plan horizon beyond 20 years “where financial constraints makes achieving targets difficult.”	Background, OHP Action 1F.2 and Action 1F.3	The revised OHP Policy 1F contains language (proposed in Public Review Draft) that states “the planning horizon shall be at <i>least</i> 20 years.” Provide guidance in OHP Mobility Standard Guidelines and Transportation System Plan Guidelines to expand on direction.
5. City of Hillsboro, 11/9/11 Letter	Strong support for the draft amendments; strong support for shift from mobility standards to targets.	Multiple Sections	No policy changes proposed.
6. Cascades West ACT, 11/10/11 Letter	Supports the proposed revisions; suggests that the OHP recognize the (Draft TPR) MMA exemption for development proposals.	Multiple Sections	Provide clarification in guideline documents (ODOT Development Review Guidelines, OHP Mobility Standard Guidelines) to ensure that approach road decisions meet the intent of the MMA exemption being considered as part of the TPR amendments.
7. Charles Ormsby, 11/12/11 Email	Concerns on relaxation of existing v/c ratios enabling analysis to ignore “cut-through traffic”;	Multiple Sections	Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	focused on impacts to neighborhoods adjoining OR Hwy 43 and US 99E.		to assess success in achieving policy objectives and impacts on system performance from changes.
8. City of Tigard, 11/14/11 Letter	Supportive of added flexibility to develop alternative performance measures. Concerned that proposed minimum trip generation thresholds may prompt multiple small applications that stay under the threshold but have same cumulative effect.	OHP Action 1F.5	Add language to the Background Section to acknowledge the trade-offs between mobility and broader community objectives. Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. Provide further direction and clarification in OHP Mobility Standard Guidelines regarding the trade-offs between multiple objectives as established in policy direction.
9. Association of Oregon Counties, 11/15/11 Letter	Supports proposed changes; suggests assessing impacts on a regular basis.	Multiple Sections	Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
10. City of Beaverton, 11/15/11 Letter	<p>Strongly supports the amendments. Suggests modifying OHP Table 7 to be consistent with Regional Transportation Plan Table 3.08-2 Interim Regional Mobility Policy:</p> <ul style="list-style-type: none"> • Delete “Areas of Special Concern” • Delete all notes, except for new Note A • Add necessary notes from Table 3.08-2 that explain the analysis hours and corridor plans • Change “maximum v/c ratios” to “targets” <p>Designate Region Managers as person best suited to provide written concurrence on interchange considerations in TPR.</p>	OHP Table 7	<p>Make modifications to OHP Table 7 as coordinated with Region 1.</p> <p>Explore potential internal procedure or delegated authority decision for having the Region Manager concur on TPR decisions near interchanges.</p>
	Adoption of mobility targets should trigger an organizational change. An ODOT work program should include changes to the Highway Design Manual and ODOT	OHP Action 1F.9, Implementation	Consider proposed training program and guideline updates. Enhanced coordination between planning and design is consistent with proposed OHP Action 1F.9.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	procedures.		
	Reconcile and potentially consolidate (Draft TPR) MMAs and Special Transportation Areas in OHP.	Implementation	This comment is more appropriately addressed through a review of OHP Policy 1B; identified as a potential next step.
11. League of Oregon Cities, 11/15/11 Letter	Supports the amendments; encourages the Commission to address appropriate implementation efforts.	Implementation	A proposed training program and revisions to guidance documents are noted as a next step implementation item.
12. City of Portland (Bureau of Transportation), 11/15/11 Letter	<p>In favor of many of the changes; requests that the following change be made:</p> <p>Amend OHP Action 1F.1 as follows:</p> <p>It can be determined, with a probability equal to or greater than 95 percent, that vehicle queues would not extend onto the mainline or into the portion of the ramp needed to accommodate deceleration from mainline speed <u>prevailing speeds during peak periods or at the time off-ramp</u></p>	OHP Action 1F.1	<p>Modify OHP Action 1F.1 to read “...to <u>safely</u> accommodate deceleration from mainline speed.”</p> <p>This modification is recommended based on discussions with analysts regarding data availability. The language change provides flexibility for areas that have available data to consider prevailing speeds as recommended.</p>

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	<u>backups may occur.</u>		
	Include in Background Section (p. 3) that the Highway Design Manual and related documents will need to reflect the revisions to OHP 1F.	Background, Implementation	Enhanced coordination between planning and design is consistent with proposed OHP Action 1F.9 and captured as a next step.
13. Charles Ormsby, 11/15/11 Email	Grievances pertaining to actions of Lake Oswego; request for a public briefing regarding OHP Policy 1F amendments to the Birdshell Community Planning Organization/Neighborhood Association (Lake Oswego).	General	No policy revisions proposed. Region 1 is working with City of Lake Oswego to provide additional information.
14. Metro, 11/15/11 Letter	Strongly supports amendments; requests an update of implementing documents, in particular the Highway Design Manual (HDM).	Multiple Sections, Implementation	Updates to implementing guidance documents are captured as a next step. Enhanced coordination between planning and design is consistent with proposed OHP Action 1F.9 and captured as a next step.
	Reconcile and consolidate (Draft TPR) MMAs and Special	Implementation	This comment is more appropriately addressed through a

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	Transportation Areas.		review of OHP Policy 1B; identified as a potential next step.
15. City of Wilsonville, 11/16/11 Letter	Supportive of efforts; recommends the following: Add language that ensures traffic studies subject to TPR -0060 are performed by “competent professionals” and identify impacts on nearby local jurisdictions. Nearby local jurisdictions should be notified and have the right to appeal “levels of mobility” decisions.	OHP Policy 1F	Revise OHP Action 1F.3 to be clear of coordination expectations with affected local jurisdictions within a corridor, consistent with OTC Policy 11 – Public Involvement. Where applicable, update guidance in OHP Mobility Standard Guidelines and ODOT’s Development Review Guidelines to enhance coordination with neighboring jurisdictions. Confirm ODOT’s Analysis Procedures Manual covers work by licensed professionals as warranted.
	Reconcile and consolidate (Draft TPR) MMAs and Special Transportation Areas.	Implementation	This comment is more appropriately addressed through a review of OHP Policy 1B; identified as a potential next step.
	Confirm if it is an OTC or ODOT decision to adopt alternate mobility targets.	Multiple Sections	No policy change proposed. Alternate mobility targets are identified in OHP Policy 1F as an OTC authority since they are

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
			amendments to the OHP. This process is detailed in the OHP Mobility Standard Guidelines.
16. Willamette Oaks LLC, Setniker, 11/16/11 Letter	Procedural concerns (ODOT/DLCD coordination/notification; Compliance with Statewide Planning Goals.	General	Notification and State Agency Coordination procedures are detailed in the Draft Findings of Compliance with Statewide Planning Goals.
	Ambiguous/undefined terms related to mobility “targets.”	Multiple Sections	Add text to the Background section, OHP Policy 1F, and OHP Table footnotes to clarify that adopted targets in the OHP, or developed through system and facility planning work, are the standards for purposes of TPR compliance. Provide additional clarification in the OHP Mobility Standard Guidelines.
	Opposed to increasing minimum v/c targets.	OHP Table 6	Retain currently adopted v/c targets for areas “Outside Urban Growth Boundary” in OHP Table 6, instead of changes to the v/c targets originally proposed in Public Review Draft.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	Concerns regarding using alternative standards where it is not “feasible or effective” to meet mobility targets.	Multiple Sections	<p>No policy changes proposed. The revised policy builds off an existing OHP policy tool (alternate mobility standards), which have been used effectively in several areas of the state. ODOT developed the OHP Mobility Standard Guidelines (2009) to help implement this concept.</p> <p>Alternative targets (or standards) are developed as part of a local transportation system planning process or ODOT facility planning process in coordination with local governments and follows existing regulations and processes for legislative plan amendments and public involvement. The alternative targets are adopted by the OTC as an amendment to the OHP, subject to the State Agency Coordination Program and OTC Policy 11 - Public Involvement.</p>
	Disagrees with providing “de minimis” traffic impacts on failing facilities, particularly for rural	OHP Action 1F.5	Add language to the Background Section to acknowledge the trade-offs between mobility and broader

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	facilities (i.e., “small increase in traffic” do not cause “further degradation”); opposed to a revision that would not count trips from amendments toward the proposed cap.		community objectives. Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. Provide further direction and clarification in OHP Mobility Standards Guidelines regarding the trade-offs between multiple objectives as established in policy direction.
17. WilberSmith Associates, 11/17/11 Letter	Strongly supports direction of the proposed revisions. Suggests reconsidering v/c distinction for freight routes; recommends moving away from the 30 th highest hour as a basis for v/c evaluations (average weekday peak hour suggested);	OHP Action 1F.3, OHP Table 6	No policy changes proposed. Moving away from 30 th highest hour was considered as a general change. However, 30 th highest hour was left as a baseline given its proxy to peak hour conditions and the lack of data for alternatives in many areas. Moving away from 30 th highest hour is presented as a clear option for development of alternative mobility targets and noted in OHP Table 6.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	Consider using the term “economic objectives” (which recognizes protection/maintenance of current economic activity) rather than “economic development.”	Multiple Sections	No policy changes proposed. In general “economic development” pertains to economic growth and includes business retention and expansion of existing businesses. As used in the Mobility Policy, it should be interpreted broadly.
18. TriMet, 11/18/11 Letter	Strongly supports proposed amendments; encourages the state to develop a work plan for amending implementing documents.	Multiple Sections	A proposed training program and revisions to guidance documents are noted as a next step implementation item.
19. City of Bend, 11/18/11 Letter	Supports majority of plan revisions; recommends the following: Amend Action 1F.1 to change “mainline speed” to “prevailing speeds during peak periods.”	OHP Action 1F.1	Modify OHP Action 1F.1 to read “...to <u>safely</u> accommodate deceleration from mainline speed. ” This modification is recommended based on discussions with analysts regarding data availability. The language change provides flexibility for areas that have available data to consider prevailing speeds as recommended.
	Add language that encourages setting the plan horizon beyond 20	Multiple Sections	The revised OHP Policy 1F contains language (proposed in

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	years “where financial constraints makes achieving targets difficult.”		Public Review Draft) that states “the planning horizon shall be at <i>least</i> 20 years.” Provide guidance in OHP Mobility Standard Guidelines and Transportation System Plan Guidelines to expand on direction.
	Commit to a process of updating HDM and other implementing documents.	Implementation	A proposed training program and revisions to guidance documents are noted as a next step implementation item.
20. Forest Park (Portland) Neighborhood Association, 11/21/11 Letter	Supportive of changes. Give serious consideration to specific changes suggested by the City of Portland (OHP Action 1F.1 “prevailing speeds”; HDM revisions).	OHP Action 1F.1	Modify OHP Action 1F.1 to read “...to <u>safely</u> accommodate deceleration from mainline speed. ” This modification is recommended based on discussions with analysts regarding data availability. The language change provides flexibility for areas that have available data to consider prevailing speeds as recommended. Enhanced coordination between planning and design is consistent with proposed OHP Action 1F.9 and captured as a next step item.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
21. City of Corvallis, 11/18/11 Letter	<p>Revisions are a step in the right direction.</p> <p>Put in place a clear and direct communication and training program.</p>	Implementation	A proposed training program and revisions to guidance documents are noted as a next step implementation item.
22. Bend Metropolitan Planning Organization, 11/18/11 Letter	<p>Supports vast majority of changes: recommends the following:</p> <p>Amend OHP Action 1F.1. Change “mainline speed” to “prevailing speeds during peak periods.”</p>	OHP Action 1F.1	<p>Modify OHP Action 1F.1 to read “...to <u>safely</u> accommodate deceleration from mainline speed.”</p> <p>This modification is recommended based on discussions with analysts regarding data availability. The language change provides flexibility for areas that have available data to consider prevailing speeds as recommended.</p>
	<p>Add language that encourages setting the plan horizon beyond 20 years “where financial constraints makes achieving targets difficult.”</p>	Multiple Sections	The revised OHP Policy 1F contains language (proposed in Public Review Draft) that states “the planning horizon shall be at <i>least</i> 20 years.” Provide guidance in OHP Mobility Standard Guidelines and Transportation System Plan Guidelines to expand on direction.

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	Consider entering into a process to revise the HDM and other implementation documents for consistency with the OHP.	Implementation	Enhanced coordination between planning and design is consistent with proposed OHP Action 1F.9 and captured as a next step.
	Consider future review of the SB 264 access management changes and the combined impact of these changes “to ensure safety is not compromised.”	Implementation	Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. This is also identified as a potential next step, which captures the relationship to SB 264, Access Management work.
23. Oregon Farm Bureau, 11/21/11 Letter	Concerned about increased congestion with proposed OHP Table 6 amendments; recommends retaining the current mobility levels for rural and unincorporated communities.	OHP Table 6	Retain currently adopted v/c targets for areas “Outside Urban Growth Boundary” in OHP Table 6, instead of changes to the v/c targets originally proposed in Public Review Draft.
	Concerns about the use of alternative targets when “infeasible	Multiple Sections	Add text to the Background section, OHP Policy 1F, and OHP Table footnotes to clarify that adopted

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	or impractical” to meet the target.		<p>targets in the OHP, or developed through system and facility planning work, are the standards for purposes of TPR compliance. Provide additional clarification in the OHP Mobility Standard Guidelines.</p> <p>The revised policy builds off an existing OHP policy tool (alternate mobility standards), which have been used effectively in several areas of the state. ODOT developed the OHP Mobility Standard Guidelines (2009) to help implement this concept.</p> <p>Alternative targets (or standards) are developed as part of a local transportation system planning process or ODOT facility planning process in coordination with local governments and follows existing regulations and processes for legislative plan amendments and public involvement. The alternative targets are adopted by the OTC as an amendment to the OHP, subject</p>

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
			to the State Agency Coordination Program and OTC Policy 11 - Public Involvement.
	Disagrees with the assumption (thresholds) that “small increase in traffic” do not cause “further degradation” on rural facilities; Recommends not applying this to rural facilities already over the maximum v/c;	OHP Action 1F.5	Add language to the Background Section to acknowledge the trade-offs between mobility and broader community objectives. Add new OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. Provide further direction and clarification in OHP Mobility Standards Guidelines regarding the trade-offs between multiple objectives as established in policy direction.
24. Hunnell United Neighbors, Inc. (Bend), 11/21/11 Letter	Supports amendments.	Multiple Sections	No policy revisions proposed.
25. Willamette Oaks LLC, Setniker, 11/21/11 Letter	Recommends eliminating the “small increase in traffic” exception.	OHP Action 1F.5	Add language to the Background Section to acknowledge the trade-offs between mobility and broader community objectives. Add new

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
			OHP Action 1F.10 to evaluate impacts from Mobility Policy amendments within 3 years to assess success in achieving policy objectives and impacts on system performance from changes. Provide further direction and clarification in OHP Mobility Standards Guidelines regarding the trade-offs between multiple objectives as established in policy direction.
	Opposes proposed use of “targets,” which replaces the measure of minimum mobility and suggests minimum mobility is optional.	Multiple Sections	Add text to the Background section, OHP Policy 1F, and OHP Table footnotes to clarify that adopted targets in the OHP, or developed through system and facility planning work, are the standards for purposes of TPR compliance. Provide additional clarification in the OHP Mobility Standard Guidelines.
	Inadequate public involvement when developing alternative mobility targets.	OHP Action 1F.3	No policy changes proposed. The revised policy builds off an existing OHP policy tool (alternate mobility standards), which have been used

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
			<p>effectively in several areas of the state. ODOT developed the OHP Mobility Standard Guidelines (2009) to help implement this concept.</p> <p>Alternative targets (or standards) are developed as part of a local transportation system planning process or ODOT facility planning process in coordination with local governments and follows existing regulations and processes for legislative plan amendments and public involvement. The alternative targets are adopted by the OTC as an amendment to the OHP, subject to the State Agency Coordination Program and OTC Policy 11 - Public Involvement.</p>
	<p>Recommends adding language to limit use of alternative mobility standards to “extraordinary circumstances.”</p>	<p>OHP Policy 1F, OHP Action 1F.3</p>	<p>No policy changes proposed. Inflexibility in the standards were found to be a significant concern and led to legislative direction in SB 795. The intent of the revised Policy 1F is to provide flexibility when targets can’t be met; limiting</p>

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
			the use of this approach to the most extreme circumstances is not practical given the lack of resources to address the current traffic conditions in many locations now and other locations projected to have congestion issues in the future (and where improvements are not possible to bring conditions up to current targets).
26. DKS Associates, 11/21/11 Email	Comments concerning targets for interchange movements; recommends using appropriate values in OHP Tables 6 and 7 for the facility type and adding requirement for a queuing analysis/additional performance standard.	OHP Action 1F.1	Provide additional guidance in OHP Mobility Standard Guidelines emphasizing that v/c is not the only consideration at interchanges.
	“Small increases in traffic” thresholds do not meet current guidelines for impact studies; they do not include a peak hour requirement.	OHP Action 1F.5	No policy changes proposed. The proposed thresholds are consistent with thresholds in SB 264 – Access Management and implementation is an evolving area of work.
	Questions pertaining to “reasonable” mitigation	OHP Action 1F.5	Address comment in proposed training program and updates to

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
	determination and variations in decision-making across Regions.		guidance documents.
27. Bicycle Transportation Alliance, 11/21/11 Letter	<p>In general, supports the direction of the policy revisions, with the following comments/suggestions.</p> <p>Requests addition of mobility targets for bicycle and pedestrian volumes. Concerns that OHP Action 1F.4 is perpetuating “motor vehicle-oriented planning.”</p>	OHP Action 1F.4, OHP Table 6 and Table 7	<p>No policy changes proposed. The proposed Background Section states “...the Highway Mobility Policy recognizes the importance of considering the performance of other modes of travel. While the policy does not prescribe mobility targets for other modes of travel, it does allow and encourage ODOT and local jurisdictions to consider mobility broadly...” Work on different performance measures is continuing at federal, state and local levels.</p> <p>OHP Action 1F.4 attempts to clarify options to protect an investment in system capacity that has been used in earlier planning work. It is not meant to negate the broader multimodal policy considerations being added to the policy revisions in general.</p>

Source Document	Comment Summary	Applicable OHP Policy 1F Section	Proposed Action
28. Mark D. Whitlow, Perkins Coie, on behalf of the Retail Task Force and the Oregon Government Relations Committee for the International Council of Shopping Centers, 11/21/11 Letter	Supports amendments as drafted, except for a request for minor amendments to add “or projected to be” (above targets) and “within the planning horizon” (re: “significantly affects”).	OHP Action 1F.5	Revise Action 1F.5 to reflect suggested clarifications, which are consistent with draft TPR amendments on same issue.

OREGON HIGHWAY PLAN
POLICY 1F REVISIONS (HIGHWAY MOBILITY STANDARDS)
PUBLIC REVIEW PERIOD COMMENTS

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Supplemental Information^{1,2}

1. 2010 Oregon Traffic Crash Summary
2. 2011 AAA Crashes vs. Congestion: What's the Cost to Society?
3. Draft Amendments to TPR 0060, Public Review Draft, October 25, 2011
4. Investment Tradeoffs Using HERS: Analysis for 1999 Oregon Highway Plan
5. The Cost of Congestion to the Economy of the Portland Region
6. Oregon Agriculture and the Economy: An Update
7. Oregon Climate Assessment Report (December 2010)
8. Repair Priorities, Transportation Spending Strategies to Save Taxpayer Dollars and Improve Roads
9. Summary of Transportation Economic and Revenue Forecasts
10. Statewide Congestion Overview For Oregon

Maps³

11. Oregon Hwy 43 Corridor: Cut-Through Traffic (Portland, Lake Oswego and West Linn)
12. Comparison – Oregon Hwy 43 Corridor: Metro 2035 RTP Scenarios and Neighborhood Cut-Through Traffic

¹ Supplemental information and Maps were provided to the Oregon Transportation Commission on CD. Others interested in a copy may contact staff at (503) 986-4121 or via e-mail at Michael.D.Rock@odot.state.or.us.

² The documents under the heading “Supplemental Information” were provided as Attachments to Willamette Oaks LLC, Setniker 11/21/11 Letter.

³ The Maps were provided as attachments to Charles Ormsby, 11-12-11 E-Mail.

Notes to Reviewers:

The "B" items highlighted below speak to the OHP tasks recommended by the Joint Subcommittee.

Please contact staff for the commenter's contact information if needed.

From: Elizabeth Graser-Lindsey

Sent: Monday, October 03, 2011 9:52 AM

To: Crall, Matthew

Cc: Kosinski Christine; Merchant Bill; Marek, Joe; Nys, Richard

Subject: Re: Transportation Planning Rule comments

Dear Committee Considering the Transportation Planning Rule:

I am concerned about several places where you are considering changes in the Transportation Planning Rule and I am concerned that the rulemaking advisory committee is projected to have a tiny minority of participants that might represent the public (advocacy organizations and citizen involvement advisory committee).

It seems there should be a two-way balancing between planners/developers/freight and the community members who use the road or a three-way balance between planners and developers and community users. Currently the public who will be most affected is a tiny minority. When the public is surveyed, liveability rises to the top as a public concern and good transportation function is a key part of liveability.

My community has been long affected by planning near an UGB and by potential and actual transportation system impacts. Parts of the rule that you are considering changing seem posed to negatively impact us are:

A1) Making it possible through exemptions for transportation analyses to be avoided at rezoning. This is unnecessary, because if the appropriate info is available, the local government is sure to use it, but often the information is largely lacking and is out of date due to other developments having already added traffic to the roads. Many comprehensive plan map designations in our area including concept planning following UGB expansions never have had necessary detailed traffic analyses. The public needs up-to-data analyses to avoid the traffic system damaging the area.

A2) Having the transportation performance fall below the standard in order to facilitate getting new development is a real disaster for the community. The D level standard is already low enough. This proposal could amount to having no standard and economic development always taking precedence over the transportation system working. The public needs the tiny protection the current system offers.

A3) The meaning of "urban centers" is unclear, but if it were to come to mean any new development of any size such as new UGB areas where a small center is planned, this change could result in no transportation system standards.

A4) Transportation is considered in a general way at the time of UGB expansions as mentioned, but this does not substitute for the detailed work needed at further points in concept planning, transportation planning or development planning. Often there is no sign of the needed money to address traffic at the time of the UGB expansion. The later evaluations ensure the transportation system will work.

A5) --

B1) If proposals with small increases in traffic are exempted, then all proposals will be

broken into small pieces because of the perception and possible reality they will not otherwise pass muster. This already happens with our annexations. The big ones aren't justifiable, so they are split up to slip in a little at a time. It's the cumulative effect that causes the problem: exemptions prevents the cumulative effect from being addressed.

B2) The worst case is important not just the average trip generator, because the roadway system has to function at all hours of the day and commuting often causes problems. It's the high load times that cause the most driver frustration and leads to the most accidents and that makes non motorist roadway users such as bicyclists and pedestrians most at risk.

B3) Streamlining is often perceived by the public as a way to shut out public concerns that the roadway system will continue to function. Predictability tends to mean that the developers are assured their project will pass no matter how bad it is; predictability means the public can consistently predict they will not be listened to or even be a part of the process.

B4) In our area it is definitely valuable to evaluate congestion at the intersection level. We even have areas where several intersections in a row are in danger of failing to function. Additional measures may be needed, but existing ones should not be discarded.

B5) We care if the systems capacity is adequate to carry the volume, so V/C ratios are valuable. In our area, some phony estimating (as determined by the ODOT reviewer) indicated that a concept plan would have half the traffic as normal, so the roadway could be left unimproved, but the concept plan did not give means nor measures nor enforcement to cause the reduction in roadway users. The proposal to not use v/c measures is not in the public's interest.

Please do not change the rules in ways that will cause harm to the roadway-using public - both the motorists and the pedestrians and cyclists, etc. Please make sure that the public is represented on your team to a sufficient degree that the public concerns are addressed fully.

Sincerely,

Elizabeth Graser-Lindsey



CITY OF REDMOND
Public Works Department

875 SE Veterans Way
Redmond, OR 97756-0100

(541) 504-2000
Fax: (541) 548-0253
info@ci.redmond.or.us
www.ci.redmond.or.us

October 4, 2011

ODOT – Transportation Development Division
Attn: Michael Rock
555 13th Street NE, Suite 2
Salem, OR 97301-4178

RE: OHP Policy 1F Proposed Revisions – City of Redmond Comments

Dear Mr. Rock:

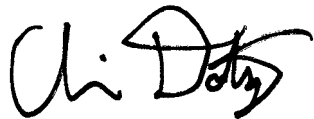
Thank you for the opportunity to review and comment upon the proposed revisions to the Oregon Highway Plan Policy 1F (Highway Mobility Policy). As you may be aware, the City of Redmond is keenly interested in alternative mobility standards and performance measures with specific regard to our upcoming TRIP 97 corridor analysis project.

General Comments:

- Action 1F.1/1F.3: Short of actually providing new, creative, and expansive performance measures and mobility standards, the policy does provide a more clearly articulated framework for facility specific discussion and adoption of these measures via the OTC. The revised policy is a step in the right direction. The policy does a good job of describing what circumstances and conditions warrant consideration of alternative mobility standards, and in doing so, implies a willingness to consider reasonable alternatives.
- Action 1F.5: Some clarification regarding some of the “small increase” details as follows:
 - a. Is the ADT on the highway measured as current volume, or that projected at the horizon year (15/20 years)?
 - b. Will a two-lane facility be considered a three-lane facility if turn lanes are provided at the subject area intersections? Same question regarding a four-lane facility with turn lanes?
 - c. It is assumed that the average daily trip thresholds apply to those trips which impact a state facility and not the total trip generation of the proposed amendment. Some clarification may be necessary. Also consider a PM Peak Hour trip threshold in addition to average daily traffic.
- Action 1F.7: This section of the policy begins to more specifically address performance measures and mobility standards relating to private approaches. The discussion in this section is a little ambiguous; it loosely implies that only highway through movements and ingressing traffic are subject to the ODOT mobility standards provided in Table 6/7. More clarification is needed to understand which mobility standard is appropriate, if any, for egressing traffic. A timeframe (horizon year) for measurement of the mobility standard would also be helpful; typically private approach mobility standards are applied at year of opening plus a specific time increment – usually short of the 15 to 20 horizon year. This section should also consider the benefits of private approach consolidation with mobility standard variances that encourage or promote improved access management.

Thank you again for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Doty". The signature is stylized with a large, looped "C" and a "D" that has a horizontal stroke extending to the right.

Chris Doty, PE/PTOE
Director of Public Works
City of Redmond
875 SE Veterans Way
Redmond, OR 97756

ROCK Michael D

From: Irish, Ron [ron.irish@cityofalbany.net]

Sent: Monday, October 31, 2011 8:56 AM

To: ROCK Michael D

Subject: Proposed OHP Revisions

Michael,

Thank you for your recent presentation to the CWA/TAC. On balance, Albany is very much in support of the changes being proposed to both the OHP and the TPR. There is, however, one item within the proposed OHP revisions that I think needs to be addressed in greater detail in order to allow full implementation of the TPR revisions.

The TPR will allow local jurisdictions to establish "MMA" zones. Once a MMA is adopted, the TPR would exempt zone changes within the area from having to meet the performance standards contained in the OHP. The reason for the exemption is to allow for creation of dense urban areas well served by alternative modes instead seeing new development driven out to the edge of towns as often happens now. The problem I envision would occur after approval of a zone change during the review of a development application. As currently proposed, the performance standards in the OHP would not recognize the MMA exemption and as a result under strict application the normal OHP performance standards would apply to the development proposal. It's easy to envision situations where a city would approve a zone change, then have no choice but to deny a subsequent development application that attempted to implement it. That would be particularly true for projects that triggered a TIA due to ODOT access or local development regulations, but it could also happen in the absence of a TIA. If intersections within the MMA were already operating outside of OHP standards, any interested party could make the case that the new development would make the situation worse and thereby violate OHP standards. In the end, LUBA would tell us how the conflict between the OHP and the TPR would be resolved and we might not like the answer. The problems with Jaqua decision come to mind.

My suggestion is to include language in the OHP that references MMA's and clarifies that OHP standards would do not apply within those areas.

Ron Irish
Transportation Systems Analyst
City of Albany
(541) 917-7656

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11/2/2011



WASHINGTON COUNTY OREGON

November 9, 2011

Attn: Michael Rock
ODOT – Transportation Development Division
555 13th Street NE, Suite 2
Salem, OR 97301-4178

Re: Modifications to the Mobility Standards

Dear Mr. Rock:

Thank you for the opportunity to comment on the modifications to the Mobility Standards. Please forward these comments to the Oregon Transportation Commission. For the most part, the County is supportive of the changes. However, we do have the following concerns:

a) Planning Horizons and Financial Constraint

We are somewhat concerned that the “reduced mobility standards” will be used to rationalize not planning for, or providing, needed long-term improvements. This is especially true in cases where funding appears to be lacking in the short term. For example, Washington County’s Highway 217 has long been planned to have three lanes in each direction. This is still the long-term goal of the county, because it is needed to meet our land use and economic development goals. Financial constraints may make it hard to achieve this goal in the near future. The County accepts this reality. That said, the County does not want short-term financial constraints to be used as a reason to accept a long-term lower mobility target. Much of the problem relates to using a planning horizon of 20 years or less and being overly conservative about funding. We have proposed some language to address this situation in attachment A, and hope these changes are adopted.

b) Need for a comprehensive statewide highway plan that evaluates the mobility targets

To understand what the term “mobility targets” means, we believe ODOT needs to do more analysis of what kinds of improvements correspond to the targets, and what these improvements cost. We believe the intent of the Transportation Planning Rule is to find equilibrium between mobility targets, projects needed to meet the targets, and the cost of the system. Statewide, we have no idea what it will take to meet the targets set out in Table 6 and Table 7. We are concerned that having lower mobility targets in the Portland metropolitan area may mean relatively less projects in the future, compared to the rest of the state. This will be troublesome, given current transportation funding formulas in Oregon. However, this is speculation. A comprehensive statewide highway plan is needed to evaluate the mobility targets and what it takes to meet them. We urge the OTC to direct ODOT to undertake this work. Providing appropriate funding for this work is important. Until it is done, we do not believe there will be a real understanding of what the mobility targets mean.

Please let me know if you have any questions. Thank you again for the opportunity to comment.

Sincerely,


Brent Curtis
Planning Division Manager

Attachment

Department of Land Use & Transportation • Long Range Planning Division
155 N. First Avenue, Suite 350-14, Hillsboro, OR 97124-3072
phone: (503) 846-3519 • fax: (503) 846-4412

Attachment A

Page 4, line 11

ODOT's intention is that the mobility targets be used to identify system mobility deficiencies over the course of a reasonable planning horizon. The planning horizon shall be:

- At least 20 years for the development of state, regional and local transportation plans, including ODOT's corridor plans; and
 - The greater of 15 years or the planning horizon of the applicable local and regional transportation system plans for amendments to transportation plans, comprehensive plans or land use regulations.
- **Where financial constraints makes achieving targets difficult in a limited planning horizon, having a plan horizon beyond 20 years is encouraged if it helps achieve long-term economic, land use and environmental objectives.**

ODOT measures vehicular highway mobility performance through v/c ratios. The v/c ratio was selected after an extensive analysis of highway performance measures prior to adoption of the 1999 Highway Plan.

Page 8, line 28

Action 1F.2

- Apply mobility targets over at least a 20-year planning horizon when developing state, regional or local transportation system plans, including ODOT's corridor plans.
- **Where financial constraints makes achieving targets difficult in a limited planning horizon, having a plan horizon beyond 20 years is encouraged if it helps achieve long-term economic, land use and environmental objectives.**
- When evaluating highway mobility for amendments to transportation system plans, acknowledged comprehensive plans and land use regulations, use the planning horizons in adopted local and regional transportation system plans or a planning horizon of 15 years from the proposed date of amendment adoption, whichever is greater.

Page 9, line 28

Action 1F.3

Examples of where state mobility targets may not match local expectations for a specific facility or may not reflect the surrounding land use, environmental or financial conditions include:

- Metropolitan areas or portions thereof where mobility expectations cannot be achieved and where they are in conflict with an adopted integrated land use and transportation plan for promoting compact development, reducing the use of automobiles and increasing the use of other modes of transportation, promoting efficient use of transportation infrastructure, improving air quality, and supporting greenhouse gas reduction objectives;

- When financial considerations or limitations preclude the opportunity to provide a planned system improvement within the planning horizon;
 - Apply mobility targets over at least a 20-year planning horizon when developing state, regional or local transportation system plans, including ODOT's corridor plans.
- **However, where financial constraints makes achieving targets difficult in a limited planning horizon, having a plan horizon beyond 20 years is encouraged if it helps achieve long-term economic, land use and environmental objectives.**
- When evaluating highway mobility for amendments to transportation system plans, acknowledged comprehensive plans and land use regulations, use the planning horizons in adopted local and regional transportation system plans or a planning horizon of 15 years from the proposed date of amendment adoption, whichever is greater.

Proposed changes are
shown in **BOLD**.

CITY OF HILLSBORO



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NOV 09 2011

ODOT
HEADQUARTERS

November 9, 2011

Land Conservation and Development Commission
635 Capitol Street NE
Salem, Oregon 97301-2532

✓ Oregon Transportation Commission
1158 Chemeketa Street NE
Salem, Oregon 97301

RE: TPR and OHP Rule Amendments

Dear LCDC and OTC Commissioners:

With great interest, the City of Hillsboro has followed the formation of proposed amendments to the Oregon Transportation Planning Rule (TPR at OAR-660-012-0060) and Oregon Highway Plan (OHP). We strongly support these amendments as currently drafted and proposed for adoption.

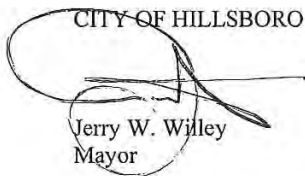
The amendments will improve our ability to implement Region 2040 Great Community concepts that are incorporated in Hillsboro's adopted AmberGlen Community Plan, draft South Hillsboro Community Plan and proposed Tanasbourne-AmberGlen Regional Center Plan.

We especially support creation of "multi-modal mixed-use areas" (MMAs) in the TPR. They will enable adoption of City zoning that will help our community develop vibrant, mixed-use employment and residential centers. MMAs will complement established Special Transportation Area (STA) provisions in the Oregon Highway Plan, thus allowing for an even broader use of the concept in the Portland Region's centers, corridors and main streets.

We strongly support the overall shift in the proposed TPR and OHP amendments from mobility standards to targets that emphasize multi-modal travel options. Using mobility targets to guide access management practices on State highways will be especially helpful in the Tualatin Valley Highway Corridor (OR8) study currently underway. Using this approach to prioritize interchange capacity will continue to accomplish the primary goals of Interchange Area Management Plans (IAMP) while allowing for a variety of design and safety solutions. We look forward to applying this new approach in the US Highway 26/Brookwood Avenue IAMP, a joint ODOT-Washington County-Hillsboro project well under way.

Thank you for your enlightened leadership in the effort to address these complex issues of urban transportation and land use.

CITY OF HILLSBORO


Jerry W. Willey
Mayor

cc: Metro Council and COO



Cascades West Area Commission on Transportation

1400 Queen Ave. SE Suite 205A • Albany, OR 97322
(541) 967-8551 • FAX (541) 967-4651 TTY/TTD (541) 924-8402

November 10, 2011

Oregon Transportation Commission
Attn: Jacque L. Carlisle
1158 Chemeketa Street NE
Salem, OR 97301

Dear Members of the Oregon Transportation Commission:

The Cascades West Area Commission on Transportation appreciates the opportunity to review the draft Oregon Highway Plan Policy Mobility Standards. CWACT reviewed the proposed revisions at its September 22 meeting and members appreciated Erik Havig's attendance and participation.

The CWACT Technical Advisory Committee reviewed the proposed revisions on October 28 and Michael Rock was a valuable asset at the meeting.

After careful consideration CWACT is pleased to support the proposed revisions. CWACT notes the importance of a better balance between economic development objectives and transportation performance. CWACT particularly supports changing "standards" to "targets" (with targets placed at the beginning of conversation rather than at the end); streamlining and enhancing alternative mobility targets, with an increase in flexibility; providing practical mitigation for economic development; and exempting proposals with a small increase in traffic.

There was, however one suggestion related to the linkage between mobility management and the proposed revision to the DLCD Transportation Planning Rule:

The TPR will allow local jurisdictions to establish multi-modal mixed use (MMA) areas. Once an MMA is adopted, zone changes within the area would be exempt from meeting the performance standards contained in the OHP. The stated intent is to allow for the development of dense urban areas well served by alternative modes instead of driving new development out to the edge of towns. A problem could occur after a zone change when a development application is submitted. The performance standards in the OHP do not recognize the MMA exemption, so under a strict application of the rule any new development would need to meet the OHP standards.

Sincerely,

Don Lindly, Chair
Cascades West Area Commission on Transportation

cc: Matt Garrett
Sonny Chickering
Erik Havig

ROCK Michael D

From: Charles Ormsby [sentinelsskip@gmail.com]
Sent: Saturday, November 12, 2011 11:34 AM
To: CRALL Matthew; SMITH Elaine * Lainie; MERCKLING Amy; ROCK Michael D; CARLISLE Jacque L
Cc: or43corr@gmail.com; loosswur@gmail.com; ccichair@yahoo.com; karenb@co.clackamas.or.us; sselden@ci.oswego.or.us; Lweigel@ci.oswego.or.us; mariameneghin@yahoo.com; glenmorrie@aol.com; amycle@co.clackamas.or.us; stevenlou@co.clackamas.or.us; powell@ci.oswego.or.us; Richard.benner@oregonmetro.gov; tom.hughes@oregonmetro.gov; metro council.systemaccount@oregonmetro.gov; carlotta.collette@oregonmetro.gov; ina.zucker@oregonmetro.gov; bcc@co.clackamas.or.us; CLehan@co.clackamas.or.us; EmilyKle@co.clackamas.or.us; psavas@co.clackamas.or.us; DrendaHowatt@co.clackamas.or.us; JBernard@co.clackamas.or.us; ALininger@co.clackamas.or.us; mjcartasegna@co.clackamas.or.us; public_affairs@ci.oswego.or.us; barbarasmo@co.clackamas.or.us; councildistribution@ci.oswego.or.us; council@ci.oswego.or.us; jhoffman@ci.oswego.or.us; smoncrieff@ci.oswego.or.us; btierney@ci.oswego.or.us; djordan@ci.oswego.or.us; molson@ci.oswego.or.us; mkehoe@ci.oswego.or.us; jgudman@ci.oswego.or.us; sentinelsskip@gmail.com; Birdshillcpona@gmail.com
Subject: OR_Hwy_43_n_US_99E_Congestion_Policies_n_Toll_Road_Schemes
Attachments: MPUB_BHCN_OR43_CutThru_2011_11Nov_09We_2100U.pdf; CHUB_BHCN_OR43_Compare_2011_11Nov_11Fr_0900U.pdf

Partial testimony for inclusion into meeting packet of Oregon Transportation Commission meeting of 2011 Nov 16 Wednesday. Regarding OTC OHP Section 1F and LCDC TPR 0060. Amendments to relax V/C “congestion ratio” metric near MMA(s) aka TOD(s) - Transit Oriented Development. Such relaxation will codify congestion, enable “cut-through traffic” without plans or projects for mitigation and justify installation of “toll road schemes”. Latter utilizing GPS based devices in every vehicle licensed to operate in State of Oregon.

2011 November 12 Saturday 11:30 U [11:30 AM PT]

Charles B. Ormsby (Skip)
Chair Birdshill CPO / NA 2011 – 2012
A joint Clackamas County Community Planning Organization (CPO)
and City of Lake Oswego Oregon Neighborhood Association (NA)

Distribution
1. Clackamas County
2. Lake Oswego
3. Birdshill Board + concerned parties (Distribute as you see fit)

Subject: OR Hwy 43 and US 99E Congestion and Toll Road Schemes
Partial Testimony on

11/14/2011

1. Oregon Transportation Commission (OTC)
 - Oregon Highway Plan (OHP) Section 1 F
 2. Land Conservation and Development Commission (LCDC)
 - Transportation Planning Rule (TPR) Section 0060
- wrt V/C – Volume to Capacity “congestion ratio” amendments

This brief e-mail for upon an extremely complex and intertwined set of public policy submits partial testimony to the OTC and serves to alert others in:

1. Dunthorpe - Multnomah Co - Riverdale NA + Riverdale School District 51J,
2. Dunthorpe - Clackamas Co - Birdshill CPO / NA,
3. Clackamas County,
4. Lake Oswego,
5. West Linn

To **deadlines for testimony** on rapidly evolving policy on land use and transportation in and about MMA(s) Multimodal Mixed-use Area(s) aka TOD(s) Transit Oriented Development(s); which will severely impact many adjoining neighborhoods along with school facilities. Riverdale Elementary School in particular.

Deadlines:

1. OTC – 2011 Nov 21 Monday 5:00 PM PT (17:00 U)
2. LCDC – prior to meeting of 2011 Dec 08 Thursday 8:30 AM (08:30 U)

Due to relaxation of existing V/C ratio “congestion ratio” metrics thereby codifying congestion on Oregon Highways such as OR Hwy 43 and US 99 E in the vicinity of TOD(s) / MMA(s) and enabling policy to ignore “cut-through traffic” impacts upon adjoining neighborhoods without projects for mitigation and recognition of costs in transportation projects including the Metro: LOPT (Lake Oswego to Portland Transit Project and PMLR (Portland to Milwaukie Light Rail).

Time to develop the attached US “B” size (11 in x 17 in) Chart and Map has been over 30 hours since 2011 November 04 Friday when I began to realize the implications of the proposed amendments to the OHP Section 1F and LCDC TPR Section 0060. After reading the Lake Oswego Review / City Notes / Transportation Plans squib article on page A11. Then attempt to distill and communicate complex cascading interaction of policy to specific highways, projects and neighborhoods.

Many leaders and citizens in those neighborhoods who have been given NO NOTICE (and vote) of the ramifications of proposed changes to existing policies, let alone definitions, reports and maps required to interpret the effects upon their schools, and neighborhoods. In my opinion a clear violation of the spirit of Oregon Land Use Goal One: Citizen Involvement.

The two attached documents distill about twenty (20) other documents into two (11in x 17 in) sheets. They are weak by my personal standards in that there is minimal reverse policy traces from the chart and map back up to Metro RTP (Regional Transportation Plan) congestion policies and then back up to OHP and TPR sections – very difficult to accomplish. Especially essential for novices, cross reference with the 2011 Nov 08 Tuesday Lake Oswego City Council Session agenda item 3.2, Phase 1 Code Reorganization, public draft PP 10-0019 and discussion of the City of Lake Oswego Planning Code and accompanying agenda packet (Get the Power Point presentation). One of many work products that should be required of planning professionals and politicians at all levels of governance in

11/14/2011

communicating policy with neighborhoods. Not likely especially in the current environment with respect to Metro LOPT project management and political figures.

This is also due to my under employment status and thus not being able to afford the latest version of MS-Visio to imbed hyperlinks into the documents. Also there is no further space on the sheets that began as E size drawings (34 in x 44 in). Unless you want the hyperlink fonts to shrink to 2 pt type sizes like you would find on footnotes to Bernie Madoff (Convicted Embezzler) portfolio management reports or ENRON (Bankrupt) Peak Hour Power generation cost invoices supplied to public power utilities.

Special thanks are needed to recognize the assistance of:

1. Michael D. Rock, Principal Planner ODOT Salem
Who took my phone call on 2011 November 04 Friday and
gave me the links to OHP Mobility Standards Revisions.
And
2. Elaine Smith, Senior Policy Advisor Region 1 (Portland)
Who took my phone call on 2011 November 04 Friday and
Who alerted me to significance of new amendment subsection 10
to the LCDC Transportation Planning Rule.

Sincerely

Skip

Charles B. Ormsby (Skip)
Chair Birdshill CPO / NA 2011 – 2012
A joint Clackamas County Community Planning Organization (CPO)
and City of Lake Oswego Oregon Neighborhood Association (NA)
Clackamas County Territory
170 SW Birdshill Road
Portland Oregon 97219-8502
Google Earth GPS Coordinates: 45°25'42.18"N, 122°39'41.48"W
[Insert coordinates into "Fly to" box on Google Earth navigation panel]
Phn: 503.636.4483 Residence
E-mail: birdshillcpona@gmail.com
Web: <http://sites.google.com/site/birdshillcpona>
E-mail: sentinelskip@gmail.com
Web: <http://sites.google.com/site/sentinelskip>

Key Websites:

1. ODOT / OTC on OHP Mobility Standards Revisions
<http://www.oregon.gov/ODOT/TD/TP/OHP2011.shtml>
2. LCDC on Transportation Planning Rule
http://www.oregon.gov/LCD/Rulemaking_TPR_2011.shtml
See Webpage Section Heading: Review Draft and Hearing
Label: Public Review Draft (PDF) <<DOWNLOAD!!>>
File: TPR0060-Public_Review_Draft-Oct25.pdf
Page 10 of 14
Section 10

11/14/2011

“Notwithstanding sections (1) and (2) of this rule, a local government may amend a functional plan, a comprehensive plan or a land use regulation without applying performance standards related to motor vehicle traffic congestion (e.g. volume to capacity ratio or V/C), ...”

3. Metro 2035 Regional Transportation Plan (RTP) Update
<http://www.oregonmetro.gov-index.cfm-go-by.web-id=25038>
Label: Related documents. Regional Transportation Plan (29 MB – HUGE!)
4. ODOT on “toll road” imitative. Report due 2012 Oct (T-minus 11 months)
http://www.oregon.gov/ODOT/TD/TP/Tolling_Background.shtml
5. Skymeter (GPS Device and Pay per month billing service / Road Tolls)
<http://www.skymetercorp.com/>
6. Survey results on LOPT (Streetcar)
<http://www.ci.oswego.or.us/calendar/CouncilMtgs/documents/111511packet.pdf>

Attached docs for e-mail, total (2)

Attachment 01

Title: Oregon Hwy 43 Corridor: Cut-Through Traffic
Desc: Map of OR 43 corridor, milepoints, features and cut through routes
File: [MPUB_BHCN_OR43_CutThru_2011_11Nov_09We_2100U.pdf](#)
Size: 332 kb, 1 page, chart US B size (wxd, 11 in x 17 in Portrait)

Attachment 02

Title: Comparison - Oregon Hwy 43 Corridor: Metro 2035 RTP Scenarios and Neighborhood Cut-Through Traffic
Desc: Chart Metro 2035 RPT Extracts & Birdhill Maps wrt OR 43.
File: [CHUB_BHCN_OR43_Compare_2011_11Nov_11Fr_0900U.pdf](#)
Size: 792 kb, 1 page, chart US B size (wxd, 17 in x 11 in Landscape)

11/14/2011



November 14, 2011

City of Tigard

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NOV 15 2011

ODOT
HEADQUARTERS

Oregon Transportation Commission
1158 Chemeketa Street NE
Salem, OR 97301

Land Conservation & Development Commission
635 Capital Street NE, Suite 150
Salem, Oregon 97301-2540

Re: Tigard Support for TPR/OHP Draft Amendments

Dear Honorable Commissioners,

Thank you for the opportunity to comment on the draft amendments to the Transportation Planning Rule (TPR) 0060 and Oregon Highway Plan (OHP). We commend the commissions, department staff, committee members, and the TPR Rulemaking Advisory Committee chair Greg MacPherson for their diligence in drafting these amendments in a way that was transparent, inclusive and balanced.

The draft TPR amendments, including the potential to exempt "Multi-modal Mixed-use Areas" from typical requirements of TPR congestion analysis (Section 10), will allow the City of Tigard to more effectively plan for communities in a way that supports efficient land uses and a balanced transportation environment. This will help overcome an unintended consequence of the TPR as it has been implemented that discourages density in some close-in areas, effectively encouraging inefficient, sprawl-type land use patterns. Additionally, the draft amendment allowing mitigations to alternative modes or locations (Section 2(e)) reflects an important shift toward system-level planning, which will provide flexibility for economic development in constrained areas while benefiting the system as a whole.

The proposed OHP amendments in Policy 1F are especially relevant to Tigard at this time. In particular, the added flexibility to develop alternative performance measures (Policy 1F.3) will be a significant factor in our upcoming Southwest Corridor Plan, which Tigard is undertaking in partnership with ODOT, Metro, and our neighboring cities and counties. The challenge of planning for this corridor in a comprehensive way requires consideration of a broad set of objectives including housing, employment, natural resources and multi-modal transportation. Alternative performance measures will be essential as we consider these many important planning objectives.

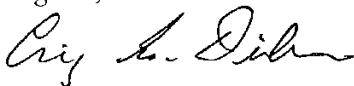
While the City of Tigard is supportive of the draft changes in both the TPR and OHP, we have two questions which are offered for consideration in your final adoption decisions.

1. The new minimum trip generation thresholds in the OHP will help overcome increased costs, delays and uncertainty associated with TPR analysis for amendments with small impacts. We support this intent. At the same time, it seems to raise the possibility of a single developer or applicant submitting multiple small applications in order to stay under the threshold. Are there provisions that will guard against this type of opportunistic interpretation of the minimum thresholds?
2. The proposed new Section 11 of the TPR will enable cities, with consent from ODOT, to accept

certain types of economic development projects with only “partial mitigation.” While we share the objective of supporting economic development, we question whether this approach is the best way to achieve the desired outcome. A significant down-side of this approach is that when one agency allows partial mitigation, the cost may be borne by all area communities – as a future developer is required to complete the mitigation, as the general traveling public bears the costs of increased congestion. The subcommittee recommendation identified possibilities for phased mitigation or mechanisms for partial payment. Where the RAC did not have time to consider these options at the depth required, it may be worthy of future consideration. Meanwhile, some of the other proposed amendments in the TPR and OHP will provide flexibility to support economic development.

In combination, the proposed amendments to the TPR and OHP will provide important new flexibility for local governments to work with state agencies to achieve community development goals in balance with the obligations for safe operations on the state highways. We strongly encourage their adoption.

Regards,



Craig E. Dirksen, Mayor
City of Tigard

cc: Tigard City Council
Tigard Interim City Manager Liz Newton
Tigard Sr. Transportation Planner Judith Gray
Mayor Willey, City of Hillsboro
Mayor Doyle, City of Beaverton
Mayor Dahlin, City of Cornelius
Mayor Ogden, City of Tualatin
Mayor Truax, City of Forest Grove
Mayor Mays, City of Sherwood

November 15, 2011

Oregon Transportation Commission
1158 Chemeketa Street NE
Salem, OR 97301

RE: Transportation Planning Rule

Thank you for the opportunity to comment on the proposed changes to the Oregon Transportation Planning Rule and the Oregon Highway Plan. AOC recognizes that the Oregon Transportation Commission and the Oregon Land Conservation and Development Commission are seeking a balance between the pressing need for economic development and maintaining a viable transportation system, also important for the viability of Oregon commerce.

AOC supports building in more flexibility into the rule to recognize that it is difficult to develop standards that reflect all the varying circumstances and differences across the state. We support amendments that will allow for phased system improvements that are proportional to the increased traffic anticipated as a result of development following comprehensive plan amendments. We support the development of creative solutions that can provide effective alternatives to mitigate impacts. It is important to recognize the impacts not just in the immediate vicinity but also for the larger transportation system.

We urge that more emphasis for flexibility be given to industrial traded sector businesses due to the significant benefits they bring to the Oregon economy.

AOC believes the Commissions should carefully monitor and review the impacts of the rule on a regular basis to ensure that the trade-off with the viability of the transportation system is not significantly compromised and that economic benefits are being realized. When examining the impacts to the transportation system, the Commissions should look at possible adverse impacts on congestion for existing businesses including those businesses that require freight mobility across the road system and for commuters.



We appreciate the opportunity to comment on the proposed rules and want to recognize the outreach efforts of ODOT and DLCD staff to draft revisions to the rules.

Sincerely,

A handwritten signature in black ink, reading "Ann Hanus", is positioned below the word "Sincerely,".

Ann Hanus

Policy Manager

C:

Michael Eliason

Jon Oshel

Mike McArthur





Denny Doyle, Mayor

November 15, 2011

Land Conservation and Development
635 Capitol Street NE
Salem OR 97301-2532

Commission Oregon Transportation Commission
1158 Chemeketa Street NE
Salem OR 97301

Dear Commission Members:

Thank you for the opportunity to comment on the Transportation Planning Rule (TPR) and Oregon Highway Plan (OHP) amendments that are proposed for action. The City of Beaverton has participated in the amendment process most recently through Metro and Washington County cities representation on the rulemaking advisory committee.

The City of Beaverton supports Metro's letter of comment and the direction for more flexibility in the Metro region that allows us to better implement the 2040 Growth Concept, the Regional Transportation Functional Plan, and our own acknowledged 2035 Transportation Plan and adopted Civic Plan.

Transportation Planning Rule Amendment Comments

Specifically, we strongly support exempting zone changes that are consistent with an adopted comprehensive plan. This allowance addresses our concerns noted in our February 11, 2011, testimony. We also support that the definition of mixed-use pedestrian-friendly center or neighborhood accepts Metro regional designations because the City has over a decade of planning efforts aimed at implementing these designations. The new provisions will specifically assist rather than hinder its Regional Center downtown development most recently refined in its adopted Civic Plan.

The City of Beaverton also strongly supports the following:

- Establishment of MMAs in interchange areas and designation of the ODOT Region 1 manager as the person best suited to provide written concurrence when interchanges are included in an MMA. The Region 1 manager is most familiar with the challenges and constraints of the highway system, Metro's and cities' transportation plans, and those recent studies that prescribe solutions and fund improvements to better manage the highways.

City of Beaverton • 4755 SW Griffith Drive • PO Box 4755 • Beaverton, OR 97076 • www.beavertonoregon.gov
ph: 503.526.2481 • fax: 503.526.2571

The Best of Oregon

- 660-012-0060(3) Public Review Draft October 25, 2011: The City prefers Option 2 text as it more consistent with the planning focus of the Rule; projected future conditions rather than current.
- 660-012-0060(9) The City prefers Option 1 that currently states: (a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map; (b) The local government has an acknowledged TSP.
- The City will seek to participate in the work that will detail the provisions, procedures, and public notice requirements of MMAs and hopes to incorporate the extensive planning effort already expended on the City's Transportation Plan and Civic Plan where we have already enacted what we believe are functional equivalents of many of the elements of an MMA.
- The City also strongly supports reconciliation and potential consolidation of MMAs and Special Transportation Areas so that jurisdictions may take advantage of such implementation strategies in a comprehensive and effective manner.

Oregon Highway Plan (OHP) Amendment Comments

The City of Beaverton strongly supports the OHP amendments. Specifically, changing Table 7 standards to targets consistent with Metro's Regional Functional Plan Mobility Policy will allow the City to move forward in implementing its Regional Centers and mixed use areas. We agree that mobility needs to be balanced with safety and alternative transportation modes. The City continues to struggle with the impacts of three congested state highways in its downtown Regional Center. With the adoption of our 2035 Transportation Plan based on a multimodal corridor concept, we were able to refine our approach to mitigation to emphasize access management, systems management, and pedestrian, bicycle, and transit solutions. It also allowed us to refine these solutions in our Civic Plan.

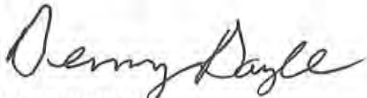
The City also strongly supports the following:

- Modify Table 7 **targets** to reflect Metro Code Chapter 3.08 Regional Transportation Functional Plan Table 3.08-2 Interim Regional Mobility Policy, not including the mid-day information. This includes deleting both Areas of Special Concern and the Notes under Table 7 except for new OHP Note A and additional necessary notes from Table 3.08-2 that explain the analysis hours and corridor plans. There should be no mention of maximum v/c ratios as these are now targets.

- Adoption of these targets should trigger an organizational change. Changes to the Oregon Highway Design Manual and ODOT procedures, to name a few of the affected areas, should be included in a work program to begin immediately.
- The reconciliation and potential consolidation of MMAs and Special Transportation Areas should be included in this work program.
- Finally, we suggest that the draft revisions to OAR 660—12—60(1)c) would be more clear if re-ordered to read as follows:
“c) Result in any of the following effects based on projected conditions measured at the end of the planning period identified in the adopted transportation system plan (TSP):
 - A) Types of travel.....
 - B) Degraded performance of an existing or planned.....
 - C) Degraded performance of an existing or planned.....As part of evaluating projected conditions.....”

Thank you for this opportunity to comment. We look forward to working with staff to implement these critical provisions in the near future.

Sincerely,



Denny Doyle
Mayor



November 15, 2011

P.O. Box 928 • Salem, Oregon 97308
(503) 588-6550 • (800) 452-0338 • Fax: (503) 399-4863
www.orcities.org

Oregon Transportation Commission
1158 Chemeketa Street NE
Salem, OR 97301

I'd like to take the opportunity to thank you and ODOT staff for the work that has been submitted for adoption as a result of the passage of SB 795 by the Oregon Legislature last June. We believe the draft revisions to Section 1F of the Oregon Highway Plan can and will make significant changes to the mobility standards by allowing a better balance with economic development and other community objectives, and we support them wholeheartedly.

We also would note that the text policy changes will require discretion from department staff for implementation, while the changes to the mobility tables are definitive and we strongly support. We recognize that the amendments will require staff to make a change in the way they do business with local jurisdictions, and that the discretionary amendments will require both administrative direction to staff and accountability by staff for implementation. In order to ensure this accountability, we would recommend that a formal implementation process or schedule be adopted, including appropriate directives to staff and follow through with related guidance documents, etc.

Particularly important to cities are the recommended amendments that:

- Change mobility "standards" to "targets" which become a starting point rather than a rigid standard;
- Amend the tables to increase the baseline v/c values that could eliminate or delay the need for small improvements;
- Allow small increases in traffic impact to already degraded facilities that would not be considered further degradation (between 400-1000 ADT, depending on facility type); and
- Allow the development of alternative mobility targets that allow area and corridor targets and measures other than v/c.

Again, we support the amendments as drafted and encourage the Commission to address appropriate implementation efforts to ensure transparency and uniform implementation by the agency to other related policies and to local jurisdictions.

Sincerely,

Linda Ludwig, Deputy Legislative Director
League of Oregon Cities

"Getting it done for Oregon's cities!"



Sam
Adams
Mayor

Tom
Miller
Director

November 15, 2011

Oregon Transportation Commission (OTC)
1158 Chemeketa Street NE
Salem, OR 97301

Dear Commission Members:

Thank you for the opportunity to comment on proposed amendments to the Oregon Highway Plan. The new policy directions reflected in the amendments will help Portland implement existing policies that support more efficient use of the transportation system through an increased share of multiple modes and development of mixed use neighborhoods.

Favorable changes include:

- An alternative mobility policy that is based on multi-modal corridors. This change embraces the corridor-based mobility policy adopted regionally last year in Metro's 2035 Regional Transportation Plan.
- The shift from mobility "standards" to "targets". The term "target" retains the concept that the OHP aim for a given threshold of vehicle performance but, unlike "standards", also implies recognition that there are other factors that should be taken into consideration by ODOT when evaluating the performance of the highway system.
- Providing ODOT new latitude in evaluating the impacts of zone changes and plan amendments that are proportionate to existing conditions. This change is especially appropriate for Portland, where traffic volume is very high on major streets and highways and the traffic impact of land use changes is typically dwarfed by background traffic in a given area. Portland, for example, ran into difficulty a few years ago when proposing zone changes in the North Interstate light rail corridor, which runs along I-5 in North Portland. These zone changes were intended to augment the region's investment in light rail by promoting higher density multi-modal mixed use development in proximity to light rail stations. Because the area around the light rail stations is also near I-5, the provisions of the OHP applied. The OHP performance standards, which focus on the capacity of the freeway to accommodate motor vehicles, made it challenging for ODOT, when evaluating the zone changes, to also be able to consider and balance the benefits of multi-modal mixed use development coupled with light rail transit.

1120 S.W. 5th Avenue, Suite 800 • Portland, Oregon, 97204-1914 • 503-823-5185
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Although the draft includes substantial and favorable changes, there is at least one minor change, and a recommendation for future work both of which, if incorporated into the draft, would help better achieve the increased latitude granted by the changes proposed elsewhere. These are:

- Page 8, lines 10-13 - Action 1F.1 in the public review draft should be amended as follows;
 1. It can be determined, with a probability equal to or greater than 95 percent, that vehicle queues would not extend onto the mainline or into the portion of the ramp needed to accommodate deceleration from ~~mainline speed~~ prevailing speeds during peak periods or at the time off-ramp backups may occur.

Heavy traffic volumes on freeways in Portland often lead to prevailing speeds being less than posted speeds, particularly during peak hours. Including the wording above in the regulation will ensure that the speeds assumed when preparing an analysis of vehicle queues are reflective of the actual on the ground conditions.

- Page 3, lines 35- 45 – The following language should be inserted into this part of the Background section of the document;

ODOT's Highway Design Manual and related implementing documents that utilize mobility standards will need to be updated to reflect the revisions to OHP 1F. Work to identify a timeline and work program for completing this work and allowing for subsequent design exceptions based on the 1F revisions will be completed by the end of 2012.

The added leeway provided by the proposed OHP changes could be easily compromised by other outdated regulations in ODOT's Highway Design Manual that give preference to motor vehicles over other modes. The City of Portland, for example, has encountered situations where ODOT's regulations limiting access onto highways prevented the City from implementing plans to provide closely interconnected local streets. Interconnected located streets are beneficial to alternate modes of transportation and are a key element in providing walkable mixed use neighborhoods.

Please consider the issues raised in this letter. Again, the general tenor of the proposed OHP changes are favorable and will support the City of Portland in its efforts to create multimodal mixed use neighborhoods that in and of themselves will work towards the greater goal of reducing the average motor vehicle trips on our highways. With a few additional changes, as recommended above, the amended OHP can be strengthened even further in its ability to help Portland achieve these goals.

Sincerely,



Paul Smith
Planning Manager
Bureau of Transportation

ROCK Michael D

From: CARLISLE Jacque L
Sent: Tuesday, November 15, 2011 9:18 AM
To: ROCK Michael D
Subject: FW: Exposure_of_tactics_n_Request_for_Birdshill_CPO/NA_Issue_Summit

From: Birdshill CPO/NA [mailto:birdshill.cpo.na@gmail.com]
Sent: Tuesday, November 15, 2011 9:02 AM
To: powell@ci.oswego.or.us; barbarasmo@co.clackamas.or.us; joel.morton@oregonmetro.gov; CARLISLE Jacque L; john.witmer@dot.gov
Cc: sentinelskip@gmail.com; Birdshillcpona@gmail.com; or43corr@gmail.com; loosswur@gmail.com; nancy.cefalo@dot.gov; elizabeth.day@dot.gov; ccichair@yahoo.com; karenb@co.clackamas.or.us; amycle@co.clackamas.or.us; sselden@ci.oswego.or.us; Lweigel@ci.oswego.or.us; mariameneghin@yahoo.com; glenmorrie@aol.com; frankla@odscompanies.com; joy_strull2002@yahoo.com; chris@ckrlaw-proptax.com; jem@manzli.com; mary.bosch@msn.com; turnock.mary@yahoo.com; heidi@littlerfamily.com; rpross@comcast.net; iquintero@magellanproperties.net; milesinor@comcast.net; jonathansnell@comcast.net; dawnnybb@mac.com; rereamer@comcast.net; pklaebe@comcast.net; randall.duncan@harrang.com; uchida.cheryl@gmail.com; bankersinvest@comcast.net; bobandmignon@comcast.net; hprussell@comcast.net; buzz@silerstudios.com; elsa@mountainparkhoa.com; jwhoa@johnswoods.com; craigrob@co.clackamas.or.us; tom.hughes@oregonmetro.gov; metrocouncil.systemaccount@oregonmetro.gov; carlotta.collette@oregonmetro.gov; ina.zucker@oregonmetro.gov; Carl.hosticka@oregonmetro.gov; Kathryn.harrington@oregonmetro.gov; rex.burkholder@oregonmetro.gov; Barbara.roberts@oregonmetro.gov; shirley.craddick@oregonmetro.gov; Jenn.Tuerk@oregonmetro.gov; Karen.Withrow@oregonmetro.gov; kristin.hull@ch2m.com; runnionk@trimet.org; reckerj@trimet.org; ROMERO Shelli; CLehan@co.clackamas.or.us; EmilyKle@co.clackamas.or.us; psavas@co.clackamas.or.us; DrendaHowatt@co.clackamas.or.us; JBernard@co.clackamas.or.us; ALininger@co.clackamas.or.us; mjcartasegna@co.clackamas.or.us; public_affairs@ci.oswego.or.us; councildistribution@ci.oswego.or.us; council@ci.oswego.or.us; jhoffman@ci.oswego.or.us; smoncrieff@ci.oswego.or.us; btierney@ci.oswego.or.us; djordan@ci.oswego.or.us; molson@ci.oswego.or.us; mkehoe@ci.oswego.or.us; jgudman@ci.oswego.or.us; jcarson@westlinnoregon.gov; tcummings@westlinnoregon.gov; cityinfo@ci.portland.or.us; Samadams@ci.portland.or.us; Nick@ci.portland.or.us; dan@ci.portland.or.us; randy@ci.portland.or.us; jeff.cogen@co.multnomah.or.us; barbara.guthrie@co.multnomah.or.us; district1@co.multnomah.or.us; district2@co.multnomah.or.us; district3@co.multnomah.or.us; district4@co.multnomah.or.us; Kathleen.m.todd@co.multnomah.or.us; sylvia@swni.org; lgard@swni.org; SEN Devlin; REP Garrett; REILEY Mike; Isaiah_Akin@wyden.senate.gov; john_Valley@merkley.senate.gov; nils.tillstrom@mail.house.gov; Lauren.Flynn@mail.House.gov; Christa.shively@mail.house.gov; Allison.Dane@mail.house.gov; alison.craig@mail.house.gov; khansen@westlinntidings.com; bmonihan@lakeoswegoreview.com; mforbes@lakeoswegoreview.com; rrandall@lakeoswegoreview.com; bschmidt@oregonian.com; ebailey@oregonian.com; agriffin@oregonian.com; steveduin@aol.com; thedesk@katu.com; koindesk@koin.com; newsdesk@kgw.com; mbenner@kgw.com; kptvnews@kptv.com; nickbudnick@portlandtribune.com; rendleman@clackamasreview.com
Subject: Exposure_of_tactics_n_Request_for_Birdshill_CPO/NA_Issue_Summit

Exposure of passive / aggressive lawyer / litigator
 tactics by 2009 – 2012 Lake Oswego Mayor
 Jack D. Hoffman for repeated attempts
 to bait and incite actions from

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2011 – 2012 Birdshill CPO / NA Chair

Charles Ormsby (aka Skip).

Precipitating event was repeated exclusion to recognize and permit oral comments on traffic congestion / “Cut-through traffic during Lake Oswego Urban Growth Management Area (UGMA) Neighborhood Chairs meeting on 2011 Nov 12 Saturday between 09:20 U – 10:05 U [(9:15 AM – 10:05 AM)PT] Request summit be convened of ALL government entities with jurisdiction over matters pertaining to the area of the Birdshill CPO / NA.

2011 November 15 Tuesday 07:00 U [7:00 AM PT]

Charles B. Ormsby (Skip)

Chair Birdshill CPO / NA 2011 – 2012

A joint Clackamas County Community Planning Organization (CPO) and City of Lake Oswego Oregon Neighborhood Association (NA)

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Distribution

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1. ALL political entities with jurisdiction in the area of the Birdshill CPO / NA
2. Concerned parties (Forward if desired)

Outline / Index::

- 1.0. Overview.
- 2.0. Precipitating Incident(s)
- 3.0. Desired Convening of a Summit
- 4.0. Actions Requested of Government Entities

1.0. Overview:

Since the ascendancy of Jack D. Hoffman to the position of 2009-2012 Mayor of the City of Lake Oswego Oregon on 2009 Jan 01 Thursday. He has carried on with actions of Judie Hammerstad (LO Mayor 2001-2008) along with other members of the 2003 – 2004 Lake Oswego City Council including Ellie McPeak (LOPT DEIS CAC Chair 2009-2011) and Lynn Peterson (Clackamas County Commission Chair 2010 – 2011, now aide to Oregon Governor Kitzhaber on Sustainability) to extend Portland Streetcar Inc. service to Lake Oswego and justify significant federal subsidies by evolving a Transit Oriented Development (TOD) area currently referred to as the Foothills District Refinement Plan (FDRP). Please note TOD(s) are also referred to as Multimodal Multiple Area(s) MMA(s) under Oregon Land Conservation Development Commission (LCDC) Transportation Planning Rule 0060, aka Oregon Administrative Rule (OAR) 660-012-0060.

It has been my unfortunate repeated perception in the years since 2003, when I had to become a citizen activist to defend the area now defined and recognized as the Birdshill CPO / NA. From an egregious annexation method known as Urban Service Provider Annexation that Jack Hoffman and former Lake Oswego Mayor Judie Hammerstad (2001 – 2008) along with other above mentioned members of the 2003 – 2004 Lake Oswego City Council will do most anything to promote Streetcar / Foothills and demote anyone or anything that presents or represents an obstruction.

Especially if you are a vulnerable unemployed Oregonian / American such as myself, Charles B. Ormsby (Skip). Who has a technical background in Mechanical Engineering / Manufacturing Engineering. Work experience on the International Space Station. Several years in transportation and land use planning as a student paying for PSU – Portland State University courses while working at CRAG [Columbia Region Association of Governments, precursor federal MPO – Metropolitan Planning Organization to 2011 Oregon Metro] and TriMet. On what evolved to become the MAX (Metropolitan Area Express) Light Rail system (Blue Line from Portland to Gresham) in the Portland Oregon region. My work involved coding transit and roadway networks using experience as a student / child transit rider across the entire Rose City Transit Company routes within the City of Portland (“Rosey” precursor transit entity to TriMet), maps, bus route schedules, punch cards and “super computers”. Not quite stone age but close enough.

All replaced by 2011 with Geographical Information Systems (GIS) and networked workstations utilizing transportation and land use planning models.

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With yet to be disclosed and itemized inputs of givens, requirements and assumptions along with a sample proof of calculation. As is required in boilers built to code and installed in most any structure in the United States. That code is the American Society of Mechanical Engineers (ASME) Pressure Vessel Code. The basic reason boilers don't blow up as they did in the 1800's killing thousands on waterways and buildings. And in particular, circa 1890, an infamous fire in New York City Garment District. Whereas in 2011, financial calculations pop off like popcorn kernels in a microwave oven. Especially those that attempt to justify both the Metro LOPT – Lake Oswego to Portland Transit Project [streetcar extension to the aforementioned Foothills District (FDRP)]

The Foothills area center is located on the east side of Lake Oswego between the west bank of the Willamette River near river mile (WLRM) WLRM_020.3 west to Oregon Highway 43 (OR 43) [aka State St in Lake Oswego] mile point (MP) at MP_06.04. At the intersection of State St and "B" Avenue.

2.0. Precipitating Incident(s)

The following precipitating incidents that forced compilation of this e-mail on tight deadlines in the face of other tight deadlines for public comment on numerous initiatives that will affect the area and environs of the Birdshill CPO / NA include:

2.1 Secreted Alerts to Lake Oswego Police Department

I have been told and advised by several others in the Lake Oswego Urban Growth Management Area (UGMA) to document suspicious brought to my attention. This includes repeated activation of secreted security warning devices on the dais of the Lake Oswego City Council Chamber. That alert the City of Lake Oswego Police Department staff to possible perceived threats from individuals who attend and speak at Lake Oswego City Council meetings. I am a prime target of Mayor Jack D. Hoffman. My allegation is he is utilizing his legal degree, professional experience, and network of affiliated political contacts in the courts and other political bodies to instill the public perception I am unstable and need to be monitored. This passive aggressive tactic was also alleged to have occurred against my person by a fellow member and political comrade of the 2003 – 2004 Lake Oswego City Council, Linn Peterson. I spoke with Clackamas County Sheriff Craig Roberts on this matter on 2011 May 17 Tuesday 09:30 U (9:30 AM). I took TriMet to that meeting near Clackamas Town Center. It required a 1/2 mile walk to Line 35 – Macadam (Oregon City) in Lake Oswego, transfer to Line 79 – Clackamas / Oregon City and four block walk to the Sheriff's office. I have no job, and an eviscerated career thus possess a disabled (for five years) car and must use TriMet when I can afford it.

2.2. Failure to permit oral comments at LO Chairs meeting

On 2011 Nov 12 Saturday 08:00 U (8:00 AM PT) Jack Hoffman convened a meeting of Neighborhood Association Chairs that exist within the Lake Oswego UGMA (Urban Growth Management Area). I think this is the fourth meeting this year. About every two months. As has become readily apparent by my exclusion of notification from these meetings in late 2010, Mayor Hoffman barely tolerates my existence and presence at these meetings. Let alone my active participation in discussions or presentation of issues pertinent to myself and the residents of the Birdshill CPO/NA. Which I have been elected to

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represent as Chair for the year 2011 – 2012.

At one meeting circa 2011 April I was repeatedly interrupted and essentially told to hurry up with my comments. Notably on the issue of “Eco-counter”, which I had received information at a Metro “Quarterly Trails” meeting. Note Eco-counter is a collection of devices, communication systems, and computer software that allow the remote counting of vehicles, bikes and pedestrians on pathways, roadways and possibly waterways. In essence counts determine the utilization of a public facility and may determine allocation of resources to its enhancement or expansion. Data sorely needed in the discussion of bikeways, roadways and transitways that traverse the area of the Birdshill CPO / NA.

It is ironic in light of the “Eco-Counter” handout (above) I attempted to discuss, a handout was given at the end of latest LO Chairs meeting held on 2011 Nov 12 Saturday, describing a sophisticated radar traffic van that had caught the mayor’s eye at a recent national conference. I have no problem with that and am likely to create a Birdshill CPO/NA Resolution along with gathered information in a RSPK – Resolution Packet to endorse the City of Lake Oswego acquisition. With funds from a \$2 M, 2010 – 2011 budget surplus. I consider such vans to be a means of “inspection after the fact” rather than data acquisition and system validation “before the event”. A subtle but key difference in approach to issues between engineers and lawyers.

I arrived about 20 minutes late to the 2011 Nov 12 Saturday meeting due to a pickup delay by a scheduled TriMet Lift / Broadway Cab requested trip (2011 Nov 11 Friday about 16:30 U) for my mother. Who must be monitored and requires wheelchair transport outside her residence on SW Birdshill Road. When we arrived at the Lake Oswego City Council Chambers the meeting was well underway and I as discretely as possible (pushing a wheelchair) took the first available / observable seating position for two adjacent seats to the right hand of Mayor Hoffman. Not my first choice for a multitude of reasons.

I attended the meeting with what I refer to as “safeties engaged”. This was due to extensive physical labor – five hours on a ladder on 2011 Nov 12 Friday required to clean gutters and roof at my mother’s residence. And about two consecutive hours of sleep the morning of the meeting. The “safeties engaged” include listening first, reflecting, speaking slowly, and not speaking until recognized. Least I be perceived by the Mayor as being threateningly aggressive and thus a recipient of retaliatory actions such as police monitoring. As he is alleged to have done repeatedly during Lake Oswego City Council meetings. When I present issues relative to the area of the Birdshill CPO / NA. Essentially to bait/provoke me into action as he has attempted to one other citizen in the Lake Oswego UGMA.

At about 9:20 AM I began to raise my hand discretely in order to be recognized on the subject of “roadway congestion”. I had on my memory stick an e-mail and two attachments ready for distribution by internet at the LO Library later that morning. It is my primary internet portal. The emails represented nearly

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thirty hours of rapid research and work performed in the past week. Since an article appeared under City Notes in the Lake Oswego Review edition of 2011 Nov 03 Thursday. The work distilled nearly twenty documents, websites and maps into two 11in x 17 in documents, a map and accompanying chart. The map identified routes of “Cut-Through Traffic” in both the Birdshill CPO / NA and Riverdale NA in Multnomah County. Both areas also commonly referred to as “Dunthorpe”. The chart linked the map with extracts of other Metro maps and policy documents on OR 43 in the 2035 Regional Transportation Plan (RTP).

The subject matter was proposed Oregon Transportation Commission (OTC) amendments to Oregon Highway (OHP) Plan Section 1F – Mobility Standards and the relaxation of congestion policies associated with the metric of the V/C, “Volume to Capacity Ratio” or “Congestion Ratio”. This is linked to Oregon Land Conservation and Development Commission (LCDC) land use, Transportation Planning Rule (TPR) with respect to MMA(s) – Multi-modal Mixed use Area(s). More commonly referred to as Transportation Oriented Development(s) or TOD(s). Of which the Foothills District Framework Plan (FDFFP) represents a prime one for both Lake Oswego and Metro as represented on the Metro Region 2040, Decision for Tomorrow, 2040 Growth Concept map (2040 Growth Concept Map). Foothills is Mayor Hoffman’s personal along with other 2003 – 2004 LO Council comrades utmost top priority. This is of course in conjunction with the contemplated Metro Lake Oswego to Portland Transit Project (LOPT) Portland Streetcar Inc service extension to Lake Oswego Via the Willamette Shore Line (WSL) Right-of-way (ROW). That bisects the Birdshill CPO / NA parallel and east of OR 43 and west of Fielding Road..

I am adamantly opposed to both projects for the reasons of performance and cost. Along with “crony capitalism” that is rife in the Public Involvement Programs (PIP) associated with each and likely funding by Urban Renewal mechanisms.

Such mechanisms for taxlots administered by Clackamas County now, effective with the recent special election on 2011 Nov 08 Tuesday by passage of Measure 3-386 which amends the Clackamas County Code by adding a Chapter 3.03 titled: Voter Approval of Urban Renewal. That requires an authorizing vote by citizens for any Clackamas County urban renewal plan in county administered territory (unincorporated areas) by all Clackamas County residents. Essentially to validate urban renewal projects that encumber new debt upon the Clackamas County property tax base.

This election defeated an intentionally placed confusing and competing Measure 3-388 submitted by a majority of the 2011 County Board of Commissioners. The voters saw through the charade of a political clique. Members of which include Jack Hoffman, and political comrades from the 2003 – 2004 Lake Oswego City Council listed above. All of whom who collectively in various venues and positions of leadership in the past eight years have ignored or berated issues I have publicly brought forth for consideration that affect the quality of life and finances of residents of the Birdshill CPO / NA.

At 9:30 AM Jack Hoffman verbally acknowledged my desire to be recognized and permitted to speak by quietly stating, “I will get to you.”. I said nothing and

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made no hand gestures in reply. And watched him further acknowledge about four others as he had done in the previous ten minutes.

At 9:40 AM I again raised my hand discretely in an attempt to be recognized, even though by this time the subject had changed from neighborhood traffic congestion.

At 9:50 AM the subject and topic of discussion returned to traffic congestion and again Jack Hoffman refused to recognize my discretely raised hand and permit me to join the discussion with pertinent comments on proposed changes to V/C or "congestion ratio". Being proffered by the Oregon Transportation Commission (OTC) and Land Use Conservation and Development Commission (LCDC). Amendments which I suspect the Mayor knows about and their ramifications to ease restrictions for development of the Foothills District.

Restrictions that exist because of the topography of Foothills and absolutely required access by additional intersections to OR Hwy 43. As demonstrated by the rapid evolution of the "north gateway" entry to Foothills by an extension of Terwilliger Blvd from OR 43 across the Tillamook Branch Line and WSL ROW and connection to an extension of Foothills Road. Between 2011 May and 2011 July. At which time it was revealed to citizens other than those on the Foothills Community Advisory Committee (FCAC), at an open house for Foothills held on 2011 Jul 14 Thursday. At this meeting this gateway concept was vigorously objected to by Stampher Road residents and myself after I had warned them of this rapidly evolving option. I had received information the Birdshill area representative on the FCAC). About the designs for an at grade crossing of the TBL that had been previously opposed by Stampher Road Home Owners Association (SHOA) now an area within the Birdshill CPO / NA since testimony was taken in a hostile "Island Annexation" attempt in 2000. Please reference City of Lake Oswego Staff Report for AN-0009, Stampher Road and Fielding Road Island Parcels, (Lake Oswego) City Council Hearing, October 17, 2000 (Tuesday). Jack Hoffman was a member of the City Council at this date and knows full well the stated opinion of SHOA to any at grade crossing of the Tillamook Branch Line (TBL) . Primarily for safety reasons. Since today in 2011 a grade separated crossing exists as it has for over sixty if not seventy or more years.

I presume Mayor Hoffman is indifferent to traffic congestion on Oregon Highways and resultant cut through traffic in neighborhoods particularly Dunthorpe – Riverdale NA (Multnomah County / City of Portland) and Dunthorpe – Birdshill CPO / NA (Clackamas County / City of Lake Oswego). Due to the fact he stongly advocates both the Streetcar and Foothills projects along with other comrades from the 2003 – 2004 Lake Oswego City Council. Who have collectively manipulated political entities and leagal positions (Lake Oswego declination to join West Linn and Tualatin in opposing Stafford area addition to Metro UGB, circa 2010 July) to enhance the viability of an extension of Portland Streetcar Inc service to the Foothills District. As a result I knew at this time I would not be recognized during this meeting of Lake Oswego Chairs. So I made no further attempts to gain his attention and recognition to speak as he had repeatedly permitted others. In brief blatant discrimination against an unemployed Oregonian. One who does not own property and has

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been asked “What dog do you have in this fight?, wrt Foothills and Streetcar.

At 10:05 AM the meeting adjourned. I prepared my mother for wheelchair travel to the Lake Oswego Library with no words spoken or gestures offered as I left the Lake Oswego City Council Chambers thoroughly and publicly humiliated.

I state that I was humiliated because in 1999 September I was placed in a similar situation by my manager at Rocketdyne Power and Propulsion (Space Shuttle Main Engine producer and contractor for the International Space Station power distribution system), then a Boeing Company Division located in Canoga Park California. At this time people were being reduced in force due to cutbacks. At a two hour meeting called by this manager I was in attendance with one other. The topic was assignments and performance. None of mine were discussed. At the end of the meeting I was asked to follow him. I was lead to the men’s washroom where I was forced to watch him urinate so he could discuss my assignments and he could get to another meeting. I reported this action to Human Resources and was subsequently transferred from his chain of command and given an extension of employment before being laid off in 2000 March. After which I returned to Oregon and Birdshill in 2000 June to deal with an evolving case of elder financial abuse of my mother which continued until 2003 April. For reference refer to Clackamas County District Court Case: CCV00-12-195.

3.0. Desired convening of a Summit

The residents of the Birdshill CPO / NA have been ill served by numerous elected officials and entities in the past fifty years. This is the date in 1961 a plan for a freeway that ultimately became I-205 was reported upon in a 1961 Dec 21 Friday Oregonian article. Needless to say Christmas 1961 was not pleasant on Birdshill with the evolving threat of eminent domain being utilized to purchase (confiscate) taxlots within a 300 ft freeway right-of-way.

This plan would have obliterated the area of the Birdshill CPO / NA. And replaced it with an interchange with OR Hwy 43 and west bridge head for I-205. It took nearly three years to move the freeway out of the Lake Oswego area and south to the City of West Linn. The process was completely adversarial. I vaguely remember a period when we did not shop in Lake Oswego due to an economic boycott of businesses that supported the freeway so they could access warehouses near 82nd Avenue in SE Portland. To this day I get a chill each time I goto Oregon City, the seat of Clackamas County offices and must pass through this interchange.

The evolution of the Metro Lake Oswego to Portland Transit Project (LOPT) has followed much of the same course as that proposed alignment of I-205. I clique of individuals conceives a half baked plan to utilize the Willamette Shore Line (WSL) ROW and extend Portland Streetcar Inc Service on the cheap to an urban renewal district in order to justify federal funding. Under the cloak of green technology. The only green is payoff and contracts to developers such as William Dame and White. Check family ties on the TriMet Board of Directors, District 2 – NW and SW Portland. In the meantime members of that clique dismiss, demean, disparage and discriminate anyone that dares to

confront decisions made well out of the public eye. Namely myself by blacklisting me from any position on any Citizen Advisory Committee that has been associated with the evolution of the Lake Oswego to Portland Transit Project and Foothills District since the year 2000. Then further disparage my person by the politically correct means of labeling me “difficult to work with”.

I have resented that label since I first heard of it in 2009. I understand it has been used by numerous Metro, Clackamas County, and City of Lake Oswego Planners and Politicians. I find it a disgusting label like one that was applied to me by children at Forest Hills Elementary School in Lake Oswego shortly after the assassination of John F. Kennedy in 1963. I was labeled “nigger” due to a mole / birthmark on my left cheek. Today a scar replaces the tissue removed. I was further treated as one and excluded by kids during recess. A teacher once caught one student stating that term to my person. The end effect was to drive the discrimination underground and out of sight. The Lake Oswego School District took no action, bullying was condoned in those days as kids being kids.

My parents moved me to Catlin Gabel School in the Fall of 1965 where I learned true discrimination by being labeled a “narc” for allegedly ratting on students who smoked in a remote parking lot. This was after being tried and convicted by a kangaroo court composed of cliques. So be it, and hence my perception of Mayor Jack D. Hoffman and most advocates of the extension of the Portland Streetcar to Lake Oswego with respect to repeated acts of discrimination in the past eight years.

Because of the above life experiences I want and request the following as is afforded under sections of the Oregon Land Use Goal One: Citizen Involvement. This is to insure objective timely, topical, transparent and traceable to source documents all issues relative to the evolution of initiatives and projects that may affect the area defined as the Birdshill CPO / NA along with residents therein.

A summit with representatives from each government entity and appointed committees that may have jurisdiction or promulgate initiatives that affect the area of the Birdshill CPO / NA. The aim of the summit is complete disclosure at one meeting for residents of the Birdshill CPO / NA of ALL programs and initiatives that may affect their quality of life or finances along with ALL known strategies, tactics and timelines that may be employed for implementation.

I have asked previously from the government entities of City of Lake Oswego, Clackamas County, City of Portland, County of Multnomah, TriMet, and Metro in public testimony and in writing during the months of 2011 February and 2011 March for a list of projects and initiatives. I received only one response from TriMet. The remaining entities have basically ignored a legitimate request from an unemployed Oregonian. No doubt in my mind due to the influence of Judy Hammerstad and Jack Hoffman. A request that should be fulfilled without question. Simply because it is the right thing to do for Citizen Involvement. Further this “issue summit” can be used as a model for

neighborhoods through out the Oregon Metro region.

The concept of an “issue summit” evolved in 2011 September and I publically requested assistance in convening one before the Lake Oswego City Council on 2011 Sep 20 Tuesday. I proposed in testimony that it take place during a Council Study Session in the time frame 2011 November – 2012 February. The prime reason for a Lake Oswego City Council Study Session in Council Chambers is the facility is equipped to record meetings and distribute by cable and internet. Even though residents in the Birdshill CPO / NA and Riverdale NA may not receive a live transmission due to the fact a large portion of the households have a cable conduit source, SW Portland, different from Lake Oswego which is sourced from Beaverton.

Obviously because 2009-2012 Mayor Jack D. Hoffman has demonstrated his willingness to dismiss and demean by discrimination and baiting tactics requests from unemployed Oregonians such as myself. I must now ask each of the legal counsels of government entities and commissions I have contacts with to intercede, persuade discriminating politicians and fulfill this request for the benefit of my neighbors in the Birdshill CPO/NA. Please remember the periodic performance review that will take place on 2012 Nov 06 Tuesday.

4.0. Actions Requested of Government Entities

I desire acknowledgement of receipt of this email and requests within fifteen days of delivery and either an agreement to assist in convening the requested meeting or “issue summit” or statements in writing rejecting its convention. The statements are to include citations from all Laws, Administrative Rules, Policies and Agreements (LARPA) why it cannot be fulfilled within thirty days. I am merely attempting fulfill the requirements of the Birdshill CPO / NA Bylaws, Article II – Principals of Operation, Section 4 – Issues and Consultation with Members which states:

“In order to assure early and continued public involvement. With adequate time for citizen notification, study, and formulation of actions in all aspects of participation in governance that may affect both the area and residents of the Birdshill CPO / NA. The Board shall:

1. Communicate with leaders at multiple levels of governance, community groups, and area service providers and ascertain what issues that may consist of projects, programs, and initiatives that will affect the area of the Birdshill CPO / NA and members within the coming year.
2. Develop an Annual Report itemizing, identifying, labeling, delineating, and describing in summary form items ascertained in item 1 above.
3. Deliver or make available the Annual Report developed in item 2 above to the membership of the Birdshill CPO / NA, no later than the Monday following Labor Day each year.
4. Consult with the membership before making recommendations about neighborhood improvements.”

The Bylaws of the Birdshill CPO / NA version 6.09 were approved by Clackamas County in 2009 June by the Board of County Commissioners headed by Lynn Peterson, and in 2009 July by the Lake Oswego City Council headed by Jack D. Hoffman.

4.1. Oregon Transportation Commission

Hopefully this e-mail will be inserted to the commission packet meeting to be held on 2011 Nov 16 Wednesday at the Oregon Gardens in Silverton Oregon.

11/16/2011

Gail Achterman
Oregon Transportation Commission (OTC) Chair

1. Request a public briefing by ODOT staff assigned to the Portland Metro Region 1 Area during the scheduled meeting of the Birdshill CPO/NA. To be held at Forest Hills Elementary School, Lake Oswego Oregon on
2011 Nov 30 Wednesday 19:00 U – 21:00 U [(7:00 PM – 9:00 PM) PT]
2. Topic to be discussed is Amendments to the Oregon Highway Plan (OHP) Section 1F regarding the V/C = Volume / Capacity ratio or Congestion Ratio. I will invite people throughout Lake Oswego, West Linn and Clackamas County.
3. Coordinate with representatives from the Oregon Land Conservation Development Commission in regards to Transportation Planning Rule 0060. Regarding relaxation of V/C ratio metrics and mitigation in MMA(s) such as one proposed for the Foothills District Refinement Plan in Lake Oswego.
4. I need to place an announcement in the Lake Oswego Review by
12:00 U (12:00 PM PT) on 2011 Nov 17 Thursday.. Please communicate rapidly. Phone 503.636.4483.

4.2. Metro, Clackamas County, City of Lake Oswego

David D. Powell,
City Attorney, City of Lake Oswego

Scott Sideras
County Counsel, Office of County Counsel, Clackamas County Oregon

Joel Morton
Senior Attorney, OMA – Office of Metro Attorney

1. Coordinate amongst yourselves and with TriMet, ODOT, City of Portland, and Multnomah County, legal officials for whom I have an incomplete list of contacts at this date. Due to the fact I lack internet service at my desk.
2. Assist me in convening an “issue summit” with respect to the Birdshill CPO / NA as stated above in the time frame of 2012 Feb – 2012 May; preferably avoiding Spring break for the Lake Oswego and Riverdale School Districts if possible. By persuading politicians with legal arguments for such a summit to take place.

4.3. Federal Transportation Administration Region 10 – Seattle Washington

Ted Uyeno
Legal Counsel, Federal Transit Administration, Region 10 – Seattle WA

1. Assist me and members of the Birdshill CPO/NA in convening a meeting with FTA officials either in Seattle WA, or Portland with respect to discrepancies that have evolved during the evolution of the Metro, Lake Oswego to Portland Transit Project (LOPT). I personally want to make sure by policy amendments to FTA policies that documents are revealed about transit models to the public, project scoring methodologies / criteria, and processes for filing complaints amongst many other issues that affect neighborhoods for a transit project seeking federal funding. If there is any to be had in the future.
2. Processes, documents and required filings in order to conduct a public review

11/16/2011

of the federal MPO (Metropolitan Planning Organization) designation for an entity such as Metro aka Oregon Metro. Citizens such as myself linked to the LOPT and others linked to the Portland Milwaukie Light Rail (PMLR) have serious reservations about the Public Involvement Processes currently employed by Metro with respect to Clackamas County. I predict that tactics recently employed by Clackamas County regarding Measure 3-386 "Voter Approval of Urban Renewal" may justify some citizens in seeking the withdrawal of Clackamas County from Metro if possible. (This is my personal request and not one from residents of the Birdshill CPO / NA).

It is unfortunate that I have had to spend nearly twelve hours compiling this e-mail to document the trespasses of Lake Oswego 2009 – 2012 Mayor Jack D. Hoffman against my person and residents of the Birdshill CPO / NA. With respect to the evolution of both Foothills and LOPT. Maybe some good will come from this e-mail and prevent such trespasses in the future and end discrimination of unemployed Oregonians such as myself. Along with the continued polarization of the Lake Oswego community for a transit project that does not perform to relieve congestion along OR Hwy 43 between Portland and Lake Oswego along with an urban renewal area that only rewards a select clique.

Sincerely

Skip

Charles B. Ormsby (Skip)
Chair Birdshill CPO / NA 2011 – 2012
A joint Clackamas County Community Planning Organization (CPO)
and City of Lake Oswego Oregon Neighborhood Association (NA)
Clackamas County Territory
170 SW Birdshill Road
Portland Oregon 97219-8502
Google Earth GPS Coordinates: 45°25'42.18"N, 122°39'41.48"W
[Insert coordinates into "Fly to" box on Google Earth navigation panel]
Phn: 503.636.4483 Residence
E-mail: birdshillcpona@gmail.com
Web: <http://sites.google.com/site/birdshillcpona>
E-mail: sentinelskip@gmail.com
Web: <http://sites.google.com/site/sentinelskip>

Attached docs for e-mail, total (0)

11/16/2011



November 15, 2011

Land Conservation and Development Commission (LCDC)
635 Capitol Street NE
Salem OR 97301-2532

Oregon Transportation Commission (OTC)
1158 Chemeketa Street NE
Salem, OR 97301

Dear Commission Members:

Thank you for the opportunity to comment on proposed amendments to the Transportation Planning Rule (TPR) and related revisions to the Oregon Highway Plan (OHP). We especially appreciate the opportunity to participate in the early stages of the rulemaking process, including the January panel discussion conducted by the joint OTC/LCDC subcommittee and subsequent rulemaking advisory committee (RAC) meetings over the past several months.

We have reviewed the draft amendments to the TPR and OHP, and strongly support the new direction proposed for both policy documents. While the TPR amendments represent a fairly targeted set of changes, we believe the impact will be substantial in allowing the Metro region to better advance our Region 2040 growth strategy.

The proposed revisions to the OHP are more sweeping, and we strongly support the new direction of defining "success" more holistically, across travel corridors and including all modes of travel. This approach will greatly enhance our ability to implement the recently adopted 2035 Regional Transportation Plan (RTP) through ongoing corridor planning and through city and county transportation system plans.

We applaud both commissions for meeting the legislated timeline for developing the draft TPR and OHP changes. Though we are providing more detailed comments below, we are generally very supportive of the proposed changes, and look forward to seeing the TPR and OHP amendments enacted in December.

Transportation Planning Rule Comments

1. We strongly support amendments to the TPR that would exempt zone changes consistent with comprehensive plans from 0060 provisions. We understand that in the RAC discussions there were concerns about plans being too out of date to be relied upon for this provision, but this does not appear to be an issue in the Metro region: Cities have followed the state periodic review process to update their comprehensive plans and, since 1995, the urban growth management functional plan triggered updates to all local plans to implement the 2040 growth concept. Updates to the RTP in 2000, 2004 and 2010 have also triggered a similar series of updates to local transportation plans.

This amendment to the TPR would remove a significant obstacle that several of our cities face in advancing the 2040 plan through staged zone changes, often made when infrastructure improvements are completed. The most prominent example is the Interstate Avenue light rail corridor, where zone changes were timed to follow completion of the MAX yellow line. These changes were nearly stopped by the existing TPR language, but would be allowed outright under the proposed changes.

2. We also support draft provisions allowing for “multi-modal mixed-use areas” (MMAs) to be designated by local jurisdictions and exempted from the 0060 provisions, with consideration given to the regional freight network. This new designation goes a long way in helping cities and counties in the Metro region advance local plans for the centers, main streets and mixed-use corridors envisioned in the Region 2040 growth strategy.

Because our local jurisdictions have already done most of the planning required to define these “multi-modal mixed-use areas”, defining their boundaries for the purpose of the TPR will be a logical and straightforward step. By definition, most of our 2040 centers are located along major thoroughfares, and often near highway interchanges, so the difficult traffic conditions anticipated by the new TPR language are a common obstacle in implementing these plans.

As currently written, the draft TPR language lists land use types that closely match some of the Region 2040 design types (regional centers and town centers, for example), and would provide a path to safe harbor from the 0060 provisions for local governments based on these designations. Other design types within the 2040 construct also generally reflect the MMA criteria (main streets, station communities and mixed-use corridors), but are not as clearly called out in the draft language.

We support this tiered approach for our region, as the 2040 centers are a basic organizing element of the 2040 growth strategy, and have been the main focus of local planning efforts. In contrast, other mixed-use areas

have often had less focus in local planning efforts, and should meet the higher bar of satisfying the MMA criteria in the draft TPR amendments. However, we suggest provisions be added to the amendments ensuring that potentially affected communities be notified when MMAs containing interchanges are proposed.

3. We support the higher standard for establishing MMAs in interchange areas as a way to protect regional and statewide travel interests, but this decision can best be made by local ODOT officials.

In the Metro region, our interchanges are a complex mixture of non-standard designs where it is often difficult to apply conventional design and safety standards. However, the Region 1 manager is well-versed in the issues and constraints presented by our interchanges, and should specifically be identified in the amended TPR as the person who provides written concurrence when interchanges are included in an MMA.

Oregon Highway Plan Comments

1. We strongly support the proposed alternative mobility policy contained in the OHP draft that allows for additional flexibility in defining mobility goals, and using multi-modal corridors to plan for and evaluate regional and statewide mobility. This change embraces the corridor-based mobility policy adopted last year in the 2035 RTP, and we look forward to applying the new provisions in the ongoing corridor work in which we are engaged.

Currently, we are conducting corridor plan efforts in the Southwest Corridor (extending from the Portland Central City to Sherwood) and East Metro Corridor (Extending from I-84 to US 26 in East Multnomah County), where we will have an opportunity to work with ODOT in developing new mobility targets under the proposed OHP changes.

2. We also strongly support the shift from mobility “standards” to “targets”. When the 2035 RTP was adopted last year, the new plan incorporated a series of “desired outcomes” that are very much like the “targets” envisioned over time, with less focus on a finish line.
3. We support the new technical latitude for ODOT in evaluating impacts of plan amendments proportionate to existing conditions. This change is especially appropriate for our region, where traffic volume is very high on major streets and highways, and the impact of a land use change is almost always dwarfed by the background traffic in a given area. The change will allow facility providers the needed flexibility to support land use changes that advance the Region 2040 strategy and reach practical design solutions for meeting system needs.
4. The proposed OHP revisions represent a major shift in state policy, but the new plan will rely on a series of implementing documents to carry this new direction to projects on the ground. Chief among these is the Oregon Highway Design Manual. In order to ensure full implementation of the

revised OHP, the OTC should include a work program for ODOT to complete these related updates to the Oregon Highway Design Manual and other implementing documents.

5. The Rules Advisory Committee discussed the possibility of reconciling and consolidating the OHP provisions for reconciling Special Transportation Areas (STAs) with the new "multi-modal mixed use areas" (MMAs) provided in the TPR amendments. This needed work should also be detailed by the OTC as a follow-up work program for ODOT in order to ensure full implementation of the revised OHP.

Again, we thank you for your leadership on these efforts, and look forward to working with you and your staff to begin implementing these important changes to the OHP and TPR in our region.

Sincerely,



Tom Hughes,
President
Metro Council

Carlotta Collette
Councilor, Metro, District 2
Chair, Joint Policy Advisory
Committee on Transportation



Jerry Willey
Mayor, City of Hillsboro
Vice Chair, Metro Policy
Advisory Committee

November 16, 2011

Oregon Transportation Commission
C/O Matthew Garrett, Director
ODOT
1158 Chemeketa St. NE
Salem, OR 97301 - 2528

Commissioners:

The City of Wilsonville offers the following testimony on the proposed changes to the mobility standards of the Oregon Highway Plan. Please note that, while we do suggest additional language, we are very much in support of your efforts to increase the flexibility of the current standards in the interest of an improved Oregon economy.

Wilsonville understands the importance of jobs and of traded-sector economic activity. Wilsonville is an economic engine for Clackamas County with over 14,000 FTE jobs, more than half of which are in manufacturing or traded-sector businesses. Approximately 21,000 freight trips move through Wilsonville each day on I-5.

We support the efforts to increase flexibility in the mobility standards of both the OHP and the concurrency standards of Subsection 0060 of the TPR, but we do have concerns about the details and about the potential for unintended consequences to the detriment of existing Oregon businesses, especially freight-dependent businesses.

That said, we offer the following suggestions for changes to the proposed language of the Oregon Highway Plan.

Under proposed Policy 1F:
Highway Mobility Policy (top of page 6 of 14, 9/21/11, Public Review Draft)

Proposed new language is shown in ***bold italics***.

“Where it is infeasible or impractical to meet the mobility targets, acceptable and reliable levels of mobility for a specific facility, corridor or area will be determined through an efficient, collaborative process between ODOT and the local jurisdiction(s) with land use authority. ***Additionally, ODOT and the local jurisdiction(s) with land use authority will assure that traffic studies are performed for proposed developments subject to Subsection 0060 of the TPR by competent professionals and that such studies fully consider the projected traffic impacts on any nearby local jurisdictions or transportation facility providers. Further, ODOT and the local jurisdiction(s) with land use authority will assure that nearby local jurisdictions and transportation facility providers are given written notice of hearings, opportunities for***

meaningful participation in the process and the right to appeal “levels of mobility” decisions by ODOT or the local jurisdiction with land use authority. The resulting mobility targets will reflect the balance between relevant objectives related to land use, economic development, social equity, and mobility and safety for all modes of transportation. Alternative mobility targets for the specific facility shall be adopted by the OTC as part of the OHP.”

It is also noted that the last sentence of the above paragraph appears to contradict the first sentence. We believe that these case-by-case “*levels of mobility*” decisions are intended to be made by ODOT, rather than the OTC, but we ask that you clarify that.

The City of Wilsonville also respectfully submits that proposals to designate or modify Special Transportation Areas (STAs), Multi-modal Mixed-use Areas (MMAs), or other geographical areas with unique mobility targets or standards should require the same four elements detailed in the paragraph above for case-by-case decisions:

1. Traffic studies with adequate breadth;
2. Notice to parties that are potentially affected;
3. Opportunity for meaningful participation; and
4. Standing to appeal.

Please note the attached Resolution adopted by the Wilsonville City Council on November 7, 2011, and submitted as additional written testimony for your consideration.

Thank you.



Tim Knapp, Mayor

RESOLUTION NO. 2333

**A RESOLUTION OF THE WILSONVILLE CITY COUNCIL ADVOCATING
CHANGES TO THE PROPOSED AMENDMENTS TO THE OREGON HIGHWAY
PLAN AND THE TRANSPORTATION PLANNING RULE.**

WHEREAS, the State of Oregon, acting through the Oregon Transportation Commission (OTC) and the Land Conservation and Development Commission (LCDC) is currently considering amendments to both the Oregon Highway Plan (OHP) and the Transportation Planning Rule (TPR); and

WHEREAS, the Mobility Standards specified in the OHP and Section 0060 of the TPR set concurrency standards for transportation improvements coinciding with amendments to the City's Comprehensive Plan, and, in some cases, with zoning amendments; and

WHEREAS, the City of Wilsonville has established its own concurrency policies for public infrastructure to assure that the pace of development does not exceed the community's capacity to provide adequate transportation facilities and services; and

WHEREAS, the City of Wilsonville is concerned about all aspects of land development and transportation within the community and in surrounding areas that impact Wilsonville; and

WHEREAS, Wilsonville is situated such that changes affecting Interstate 5, Interstate 205, regional transportation systems, and freight systems are all of vital importance to the community; and

WHEREAS, the City of Wilsonville is committed to land use and transportation policies that are reasonable and based on common sense, and that transportation facilities function efficiently and effectively.

NOW, THEREFORE, THE CITY OF WILSONVILLE RESOLVES AS FOLLOWS:

1. The City advocates for amendments to both the Transportation Planning Rule and Oregon Highway Plan that will:
 - a. Recognizing that transportation impacts are not limited by geopolitical boundaries, require evaluation of transportation impacts beyond the immediate vicinity of a proposed development to determine if significant effects will result; and

- b. Allow all affected local governments the opportunity to participate in and appeal development decisions where multimodal, mixed-use areas (MMAs) are established or where “partial mitigation” is proposed at locations that significantly affect Wilsonville.
- c. After annexation, give cities the option to delay consideration of transportation issues until comprehensive plan amendments allowing more intense development are proposed;
- d. Retain consideration of near-term impacts of development projects, rather than relying exclusively on modeling of long-term planning projections;
- e. Allow development projects to go forward with minimal improvements where de minimis impacts are projected to result;
- f. Allow for creative solutions, including transportation system management solutions and changes to the special geographic areas where reduced standards will apply;
- g. Allow for phased system improvements that are proportional to the increased traffic anticipated as a result of development following comprehensive plan amendments;
- h. Recognize the “vesting” for proposed zone changes that conform with acknowledged comprehensive plans which include acknowledged transportation system plans;
- i. Support existing Oregon businesses, including freight interests, without putting them at a competitive disadvantage when compared to proposed new businesses.

2. This Resolution is effective upon adoption.

ADOPTED by the Wilsonville City Council at a regular meeting thereof this 7th day of November 2011, and filed with the Wilsonville City Recorder this date.


TIM KNAPP, MAYOR

ATTEST:


Sandra C. King, MMC, City Recorder

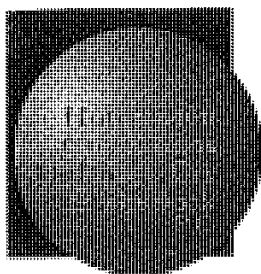
SUMMARY of votes:

Mayor Knapp - Yes
Council President Núñez - Yes
Councilor Hurst - Yes
Councilor Goddard - No
Councilor Starr - Yes

RESOLUTION NO. 2333

N:\City Recorder\Resolutions\Res2333.doc

Page 2 of 2



**Attorneys and
Counselors at Law**

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Of Counsel

John G. Cox

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Douglas M. DuPriest

November 16, 2011

Oregon Transportation Commission
ODOT -Transportation Development Division
Attn: Michael Rock
555 13th Street NE, Suite 2
Salem, OR 97301-4178

Re: **Proposed Amendments to Oregon Highway Plan**
Our Clients: Willamette Oaks LLC; David and Joan Setniker
Our File No.: 9083/10855J

Dear Oregon Transportation Commission Members:

Our firm represents Willamette Oaks LLC, and David and Joan Setniker, Oregon business owners and farmers who are concerned with the proposed amendments to the OHP and its impacts on transportation facilities in Oregon. We write to oppose the proposed amendments to the Oregon Highway Plan (OHP) for the reasons set forth below.

Please include this letter in the record of these materials and include our firm on the list of parties receiving future notices associated with the proposed amendments, as well as a copy of any adopted final transportation policy plan amendments and findings.

A. Violation of OAR 660-030-0075

Before turning to the proposed amendments, we need to draw the Commission's attention to an apparent violation of ORS 197.180, and the rules of the Oregon Department of Transportation and Department of Land Conservation and Development associated with proposed amendments that impact land use. ORS 197.180(1)(a) provides in relevant part that "state agencies shall carry out their planning duties, powers and responsibilities and take actions that are authorized by law with respect to programs affecting land use...in compliance with the goals, rules implementing the goals and rules implementing this section."

In accordance with these requirements OAR 731-015-0045 and OAR 731-015-0135 require that the Oregon Department of Transportation coordinate with the Oregon Department of Land Conservation and Development with regard to amendments to its transportation policy plan, and to follow the procedures at OAR 660-030-0075 "to assure that new or amended rules and programs comply with the requirements of ORS 197.180 and OAR Chapter 660, Division 30."

OAR 660-030-0075 provides that 45 days before an agency adopts new rules or programs or amends existing land use programs it must provide notice to the Department of Land Conservation and Development identifying, amongst other things, whether the proposed amendment is or is not "an agency land use program" and, if so, how the agency plans to address goal compliance. OAR 660-030-0075(3). The Department of Land Conservation and Development is required to review such notice, and may provide written comments concerning the proposed program or rule including recommended revisions and modifications.

The proposed amendments at issue relate to a land use program or rule that will have far-reaching affects on transportation planning throughout the State of Oregon. However, Matthew Crall at the Oregon Department of Land Conservation and Development confirms that no notice has been provided by the Oregon Department of Transportation that addresses the proposed amendments goal compliance. Accordingly, the proposed amendments must adhere to the requirements of ORS 197.180, OAR 660-030-0075, and Chapter 731 Division 15.

B. Proposed Amendments

The proposed OHP amendments are described in terms of flexibility. While this may be true for an individual developer or project, this flexibility would be paid for by all other Oregonians by increased congestion on state highways, diminished freight movement, reduced improvements to the highway system, and a downward spiral that would worsen the very worst facilities.

The Oregon Department of Transportation is underfunded, and is fighting an uphill battle just to maintain the existing statewide highway system. The FHWA data indicates that only 55% of major roads in Oregon were in "good" condition in 2008. Estimated annual repair and maintenance needed for Oregon roads is \$416,000,000, while average annual expenditures on repair and preservation is at \$155,000,000 or approximately 19% of the

state's annual needs.¹ At the same time the ODOT is expect to provide system expansions to encompass projected growth in the State of Oregon,² while experiencing a deterioration in highway revenues that have been described as "the most severe since the recession in 1981-1982, which hit the state particularly hard." *Summary of Transportation Economic and Revenue Forecasts*, ODOT, September 2011, p. vi.

ODOT relies on the Oregon Highway Plan (OHP) in conjunction with the state's Transportation Planning Rule to protect existing infrastructure and to provide additional improvements to assure that allowed land uses are consistent with the identified function, capacity and performance standards of the state's highway facilities. The OHP imposes minimum mobility standards on state facilities to protect these facilities from congestion. The OHP measures proposed land use changes against impacts to capacity and requires measures to prevent further degradation to the performance of facilities that are already at or above their capacity limits. Unfortunately, the proposed amendments significantly undermine this system.

1. Changing minimum mobility standards to "targets"

One of the primary changes proposed is to change the minimum mobility standards to "targets." This fundamentally changes the purpose of the highway mobility standards from a floor below which no one is allowed to go, into a ceiling that the agency and local governments now only aspire to reach. This will decrease mobility on facilities throughout the state, as a growing number of highways exceed the minimum mobility standards of the OHP.

The OHP highway mobility standards establish a facility's minimum volume-to-capacity ratio. To quote current version of the OHP:

"A volume to capacity ratio (v/c) is the peak hour traffic volume that the highway section can handle. For example, when v/c

¹ These estimates were presented on page 11 of *Repair Priorities; Transportation spending strategies to save taxpayer dollars and improve roads*, June 2011, based on the most recently available data from the FHWA (2004-2008), and were prepared by the national nonprofit coalition Smart Growth America and national nonprofit group Taxpayers for Common Sense with the support of The Rockefeller Foundation. The report acknowledges the contributions of its advisory experts including Grace Crunican, Former Director, Oregon Department of Transportation for assistance with it methodology and research design and for screening the report for accuracy including.

² Between 2004 and 2008, the State of Oregon actually saw an overall reduction in lane-miles. According to *Repair Priorities*, the State of Oregon saw an aggregate reduction of three lane-miles in this period, likely as a result of jurisdictional transfers of facilities. *Repair Priorities*, p. 24.

equals .85, peak hour traffic uses 85 percent of a highway's capacity; 15 percent of the capacity is not used. If the traffic volume entering a highway section exceeds the section's capacity, traffic queues will form and lengthen for as long as there is excessive demand. When v/c is less than but close to 1.0 (e.g., 0.95), traffic flow becomes very unstable. Small disruptions can cause traffic flow to break down and long traffic queues to form."

This description of traffic instability is removed in the proposed amendments. However, removing the description does nothing to alter the fact that the closer a facility comes to having traffic that is equal to 100% of its capacity, the greater the congestion, the slower the movement of goods and people, the greater the risk of accidents, and the greater the release of greenhouse gasses, including but not limited to Carbon Monoxide.³ The OHP currently attempts to limit these impacts by providing v/c ratios sufficient to avoid congestion on most state highways, and by providing that these standards "shall not be exceeded." OHP 1999, p. 77-79, Action 1F.1.

The proposed amendments do not provide that these minimum standards "shall not be exceeded" but instead rely on them as "mobility targets" that are used only when "initially assessing" state highway segments. OHP 9/21/11 Public Review Draft, p. 6-14, Action 1F.1. The proposed amendments go on to provide:

"Where it is infeasible or impractical to meet the mobility targets, acceptable and reliable levels of mobility for a specific facility, corridor or area will be determined through an efficient, collaborative process between ODOT and the local jurisdiction(s) with land use authority. The resulting mobility targets will reflect the balance between relevant objectives related to land use, economic development, social equity, and mobility and safety for all modes of transportation. Alternative mobility targets for the specific facility shall be adopted by the OTC as part of the OHP."

The proposed amendment replaces clear and objective standards for the performance of state highway facilities with no standards for their performance.

³ Increases in greenhouse gases associated with increased congestion run contrary to the State of Oregon's policy to "reduce greenhouse gas emissions" by "arresting the growth of Oregon's greenhouse gas emissions" and attaining significant reductions overall in less than 10 years. ORS 468A.205. It also inconsistent with "targets" for greenhouse gas reductions adopted for urban centers by the Department of Land Conservation and Development. OAR 660-044-0020 & 25. Nor has the state apparently conducted a review of the impacts of these proposed increases in congestion on motor vehicle emission budgets adopted by a number of metropolitan areas as a requirement under the Clean Air Act.

The new rules provide instead a maze of undefined terms and expectations. It is unclear from the proposed amendment when it is "infeasible or impractical" to conform to the minimum targets. This subjective standard could be limited to situations where a particular needed improvement is "infeasible or impractical" because it could not be constructed due to the physical constraints of the surrounding property (unstable terrain, ravine, large body of water, etc), or regulatory constraints on the development (NEPA, ODOT design standards, etc.). On the other hand, a proposed improvement might be viewed as "infeasible or impractical" based merely on the expense of the project. Yet, this raises the possibility of a target becoming more or less feasible or practical based on the financial capacity (or presumed financial capacity) of an individual or entity.

Likewise, the rule fails to explain what constitutes "acceptable and reliable levels of mobility." It is certainly not the minimum volume-to-capacity ratios that are now in the OHP, nor is it the increased levels of the mobility "targets" in the revised Tables 6 and 7. Rather, where it is "infeasible or impractical" to ensure that an amendment won't exceed 85%, 95% or even 110% of a facility's capacity, the amendment provides for a poorly-described process using undefined standards to determine an alternative "acceptable and reliable" level of mobility.

There are no guidelines or criteria for defining failure as an acceptable or reliable level of mobility. There is no specification in the amendments of how much congestion is too much, how many accidents or fatalities are acceptable, how many thousands of tons of CO or greenhouse gases from idling vehicles will be permitted, how much wasted energy allowed, or how much of a delay to people or freight is "acceptable or reliable" for the state's highway facilities. Rather, this determination is left to unidentified decision-makers in an extremely vague process.

The amendments provide only for "an efficient, collaborative process" involving ODOT and "local jurisdiction(s)" as stakeholders. While this may sound good, the devil is in the details. In contrast to other collaborative processes established by state law which include detailed procedural requirements, the amendment includes no information on how the "collaborative process" will function. See OAR 137-005-0010 *et seq.* ORS 197.652 *et seq.* The amendment does not provide for any oversight of the process by the OTC, Land Conservation and Development

Commission, or other agency.⁴ No procedure is established that would identify affected parties as participants, highlight issues implicated by the proposed alternative targets, provide for a means for identifying or reaching a consensus on solutions, or to provide a deadline for the process.

Moreover, despite the fact that these alternative standards would be impacting public highway facilities, no provision is made for public participation.⁵ There is no notice specified, no hearings process, and no indication that criteria will be used to evaluate whether a level of mobility is "acceptable and reliable." This is contrary to Oregon Statewide Planning Goal 1 which requires state agencies to coordinate their planning efforts with "affected governing bodies and make use of existing local citizen involvement programs established by counties and cities" with regard to their planning efforts. It is also inconsistent with Policy 7.3 of the Oregon Transportation Plan,⁶ and Policy 2.D of the OHP⁷ which require the state to involve citizens in its transportation planning activities. As the proposed amendment provides for no public involvement in this collaborative process, it is inconsistent with Goal 1, the OTC and the OHP, and should not be approved.

Moreover, the proposed balancing test does not include Oregon Statewide Planning Goal compliance among those factors considered in adopting alternative mobility standards. Providing for increased congestion beyond current rates of failure in the OHP will likely have significant impacts on several of these Goals.

- Goal 6 (Air, Water and Land Resources Quality) requires that the state "maintain and improve the quality of air, water and land resource of state" with particular attention given to applicable state and federal environmental quality statutes. Alternative mobility

⁴ The OTC is ultimately required to adopt the "alternative mobility standards" established in this collaborative process into the OHP. However, it is not a party to the process, nor is it charged with certifying the collaborative process as LCDC is for regional collaborative problem solving.

⁵ In fact, there is some question as to whether the proposed amendment envisions public involvement. Collaborative dispute resolution frequently involves confidentiality provisions which would be inappropriate in a public transportation planning context, and should be expressly excluded from the collaboration process referenced in the amendment.

⁶ "It is the policy of the State of Oregon to involve Oregonians to the fullest practical extent in transportation planning and implementation in order to deliver a transportation system that meets the diverse needs of the state."

⁷ "It is the policy of the State of Oregon to ensure that citizens, businesses, regional and local governments, state agencies, and tribal governments have opportunities to have input into decisions regarding proposed policies, plans, programs, and improvement projects that affect the state highway system."

standards must be measured against these minimum legal requirements.

- Goal 9 (Economic Development) requires provision of sites sufficient for economic developments specifically taking into the account the "availability of key public facilities" and "necessary support facilities." Alternative mobility standards which increase congestion on state highways beyond failure would likely impact these key transportation facilities as well.
- Goal 11 (Public Facilities and Services) requires that development be supported by "types and levels of urban and rural public facilities and services appropriate for, but limited to" the needs of the area. Approving mobility standards that would permit failure of transportation facilities clearly implicates this statewide planning goal.
- Goal 12 (Transportation), likewise, requires transportation plans to "facilitate the flow of goods and services to strengthen the local and regional economy." This provision is clearly implicated by amending the OHP to adopt mobility standards that will not improve the functioning of a highway facility or the movement of goods and services.
- Goal 13 (Energy Conservation) requires that the state "conserve energy." Again, increased congestion resulting from the proposed alternative standards clearly implicates these provisions.

As the proposed amendment does not provide for goal compliance as part of the review procedures, the proposed amendment should be denied.

In SB 795, the OTC was tasked with streamlining, simplifying and clarifying "the development of mobility standards, including but not limited to volume to capacity ratios or corridor or area mobility standards." The proposed amendments do not follow this direction. Instead, the clear and objective standards have been eliminated, and replaced with a program of "mobility targets" and an undefined collaborative process for determining "alternative" targets. This system of targets does nothing to streamline, simplify or clarify mobility standards, and would invite additional litigation if only to better refine the uncertainty surrounding the present amendments. In light of the defects in the current proposal we request that this amendment be rejected, and

other, as yet unknown standards. The OHP provides volume to capacity ratios "to improve clarity and ease of implementation" for its minimum mobility targets. As noted in the proposed amendments:

"ODOT measures vehicular highway mobility performance through v/c ratios. The v/c ratio was selected after an extensive of highway performance measures prior to the adoption of the 1999 Highway Plan. The review included the effectiveness of the measure to achieving other highway plan policies (particularly OHP Policy 1B, Land Use and Transportation), implications for growth patterns, how specifically should ODOT policy integrate with land use, flexibility for modifying targets, and the effects of Portland metro area targets on the major state highways in the region. V/C based measures were chosen for reasons of application consistency and flexibility, manageable data requirements, forecasting accuracy, and the ability to into area-wide targets that are fairly easy to understand and specify. In addition, since v/c is responsive to changes in demand as well as capacity, it reflects the results of demand management, land use and multi-modal policies." Review Draft, p. 4.

In fact, the only limitations identifies are "limitations in applying v/c, especially in highly congested conditions and in a multi-modal environment."

However, proposed Action 1F.3 provides that:

"In the development of transportation system plans or ODOT facility plans, where it is infeasible or impractical to meet the mobility targets in Tables 6 or Table 7, or those otherwise approved by the Commission, ODOT and local jurisdictions may explore different target levels, methodologies and measures for assessing mobility and consider adopting alternative mobility targets for the facility. While v/c remains the initial methodology to measure system performance, measures other than those based on v/c may be developed through a multi-modal transportation system planning process that seeks to balance overall transportation system efficiency with multiple objectives of the area being addressed." Review Draft, p. 9.

Hence, while v/c ratio has long been recognized as an objective, effective and flexible method for addressing the functionality of the state's highway facility, this action provides that ODOT and local jurisdictions may abandon this measure based on the fundamentally subjective determination that it is

that the OHP retain the clear and objective standards set out in its current version.

2. Increasing minimum volume-to-capacity ratio

Despite the ill-advised shift from minimum mobility standards to “targets” and the procedure for establishing alternative targets, amendments will initially be measured against the mobility targets. The proposed amendments include increases in congestion on all state highway facilities by 5% to 10%, with some facilities seeing increases of up to .95 or 1.0 as acceptable targets despite the instability of traffic flow at those levels. Much of this increasing intensity is in on facilities that are inside urban growth boundaries, where increased congestion to 85%, 90%, or 95% on statewide highways will have direct adverse impacts on economic development for the state by slowing the movement of freight, and people, on air quality, on public facilities and services, and on the state’s goal of energy conservation. As these impacts have apparently not been considered, it is appropriate for the OTC to deny these proposed amendments.

Moreover, these across-the-board increases also increase congestion outside of urban growth boundaries, where many of the standards previously applied in urban areas are now proposed to be applied directly to rural lands and unincorporated communities. Urban standards of mobility and congestion are not directly transferable to these areas. Much of the economic activity outside of the State of Oregon’s urban centers continues to center around agriculture and resource extraction. According to a recent study by Oregon State University Oregon agriculture accounts for fully 15% of all activity in the state, some \$22 billion in the Oregon’s net state product. Forest products, while in decline and impacted by the recession, continue to be one of Oregon’s largest manufacturing industries.

The proposed amendments would permit congestion equivalent to what one currently expects on highways in metropolitan areas, on rural highways that carry farm equipment, and produce and log trucks. Increased congestion on these routes will conflict with these resource industries at a time when they cannot afford to lose market share. It also raises severe life safety concerns as congested conditions result in increasing conflicts between heavy trucks and other equipment and passenger vehicles.

3. Using alternative standards Volume-to-Capacity Ratio/Peak Period Analysis

In addition to replacing standards with “targets” the proposed amendments provide for the replacement of the volume to capacity ratio with

not “feasible or effective” to meet mobility targets. V/c ratio does not become any less reliable a measure because a proposed amendment may not meet mobility targets. Rather, the proposed amendment would not only provide for an alternative target but an alternative and undefined means to measure this alternative target.

With regard to the alternative target, as is set forth above, the process is sufficiently ill-defined that it is unclear how interested parties would be involved in the process, how the issues would be defined, and how the process would result in a decision. Adding to this uncertainty is the suggestion in Action 1F.3 that mobility standards for an individual facility would be adjusted based on a determination of “system efficiency” which may have little or nothing to do with the efficient functioning of the impacted facility. Accordingly, these alternative targets should be denied.

The alternative analysis only heaps uncertainty on top of uncertainty by suggesting that alternatives to v/c may be appropriate, but not specifying any alternative standards. The Action suggests some changes to required analysis including “changing the hour measured from the 30th highest hour, using multiple hour measures, or considering weekday or seasonal adjustments.” *Review Draft*, p. 10. However, these all appear to be deviations away from peak-period analysis that would not provide for an alternative v/c ratio but would only understate existing traffic volumes by failing to account for periods of peak use of the facility. No alternative analysis or methodology is set out in the amendment, nor is there a process defined in the rule for adopting alternative methodologies except for a general statement that “ODOT will consider tools and methods that have been successfully used previously for a particular facility and/or within a specific metropolitan area or region.” *Id.* at 11. This is not an alternative to v/c analysis or a procedure for establishing an alternative. While v/c ratio may not be perfect, the proposed amendment incorporates no alternative measurement or means of defining the same. Accordingly, the OTC should reject this poorly-defined alternative measurement, and adhere to the clear and objective standards embodied in the v/c ratio.

4. Providing for “De Minimis” Traffic Impacts on Failing Facilities

The proposed amendments will result in hundreds or thousands of additional trips on facilities that are already failing. The OHP provides that the standard for highways that are already failing is “to avoid further degradation.” However, the proposed amendments change what avoiding further degradation actually means to permit hundreds, and, in some cases, up to one thousand average daily trips per amendment to impact these failing without being considered “further degradation.” Even individual

amendments would add substantial volumes of traffic to the facilities that can least afford to handle them. What's more, there is no limit on the number of these individual "de minimis" amendments that may be approved, or a requirement that takes into account cumulative impacts from such amendments on an impacted facility. These "de minimis" amendments are likely to result in further degradation of state highway facilities by providing for substantial increases in traffic on failing infrastructure without any offsetting improvements. Accordingly, the proposal fails to preserve the capacity or functionality of the existing highway system, is inconsistent with Policy 1G of the OHP, and should not be approved.

The volumes of traffic proposed to be considered as "de minimis" are actually substantial both in terms of actual development, and in impacts on facilities. Action 1F.5 provides:

"The threshold for a small increase in traffic between the existing plan and the proposed amendment is defined in terms of the increase in average daily trip volumes as follows:

- Any proposed amendment that does not increase the average daily trips by more than 400.
- Any proposed amendment that increases the average daily trips by more than 400 but less than 1001 for state facilities where:
 - The annual average daily traffic is less than 5,000 for a two-lane highway.
 - The annual average daily traffic is less than 15,000 for a three-lane highway.
 - The annual average daily traffic is less than 10,000 for a four-lane highway.
 - The annual average daily traffic is less than 25,000 for a five-lane highway."

This would permit between 400 and 1001 additional trips on any failing highway facility. These standards would result in substantial levels of development using failing highway facilities without providing contributions to offset any of their impacts on the system. Even at the low-end of the range specified, the 400 trips is the functional equivalent of 41 single-family homes, an 80-unit mobile home park, or 95 high-rise apartments. These are significant levels of development, and it is not unreasonable for the state to expect these developments to provide offsetting improvements for the increased traffic volumes. It also has been argued that the proposed amendment should not count all trips toward the 400 to 1001 cap, but would

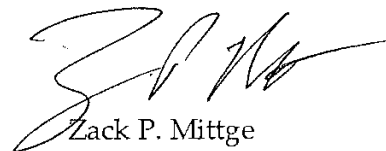
only count the number of trips on particular failing facilities. We would strongly oppose such a revision to the rule. This would exempt substantially more and larger amendments from the requirement to at least offset their own impacts on statewide facilities, based on the vagaries of trip assignment assumptions. The OTC has an obligation, even under these trying economic times, to preserve the function of these highway facilities. This purpose is not served by permitting substantial levels of development to access failing facilities without even requiring them to offset their own impacts.

Moreover, the proposed trip levels at issue are far from de minimis with regard to the impacted facilities. For example, under the proposed revisions a failing two-lane highway with average daily traffic of 5,000 trips can automatically take an additional 1,000 trips from any amendment. This is a 20% jump in trips on a facility has already had its capacity consumed. This means increased traffic, queues, and likely gridlock for these facilities. Moreover, there is **no limit** on the number of these "de minimis" exceptions that may be provided under this nondegradation standard. Rather, the same failing facility could be impacted by 1,000 trips from new higher density housing, while at the same time dealing with 400 trips from a mobile home park approved six months ago and 750 trips from an industrial facility approved two years ago; and without any of these facilities addressing the impacts from their own development on the system. This is not preserving the functioning of the existing system. Instead, by providing for no mitigation associated with these de minimis impacts, it will encourage concentration of development on facilities that are least able to handle it.

The increased congestion, and corresponding decrease in mobility on the state highway system would decrease economic development in the state, undermine adequate public facilities and services specifically including transportation facilities, and undermine energy conservation and air quality goals. Accordingly, the proposed de minimis exception amendment should be rejected.

Very truly yours,

HUTCHINSON, COX, COONS,
DuPRIEST, ORR & SHERLOCK, P.C.



Zack P. Mittge

ZPM/erl



November 17, 2011

Mr. Michael Rock
ODOT Transportation Development Division
555 13th Street NE, Suite 2
Salem, OR 97301-4178

Subject: OHP Policy 1F Proposed Revisions

Dear Mr. Rock:

The OHP Policy 1F Proposed Revisions – Public Draft recognizes the importance of livability, sustainability and economic vitality in the planning for highway improvement needs. It is a major step in the right direction that reflects today's goals and policies and the reality of constrained public resources available for transportation improvements. The proposed revision substitution of rigid standards with more flexible volume capacity targets is critically important to more enlightened highway improvement investment decisions. We strongly support the direction these proposed revisions are moving.

The wording might be improved to recognize protection/maintenance of current economic activity, and not just future economic development. Oregon's strength lies in its livability and environmental attributes and these must be protected as a foundation for economic growth. Highway improvements should enhance current businesses as well as support new job growth and economic development. Thus, we suggest using the term "economic objectives" rather than "economic development" in order to more comprehensively cover current jobs as well as future economic growth.

The v/c targets in Table 6 appear to give preference to freight highways. We concur that truck movements with Oregon origins and destinations are important, but question why peak commute hour v/c ratios for freight highways should be better than regular highways. Long distance freight traffic can easily avoid peak commute hour traffic, except perhaps in the Portland area. If the long distance trucks can avoid commute peak hours, why should the peak hour v/c ratios be different than other highways? We suggest that the v/c distinction for freight routes be reconsidered in this policy.

We also suggest that ODOT move away from the 30th highest hour as a basis for v/c evaluations. Current traffic count, and future forecast are all in average weekday peak commute hours and must be inflated by ODOT to define 30th highest hour. Most DOTs use average weekday peak hours for traffic analysis and planning.

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Mr. Rock
November 17, 2011
Page 2

Lastly, Policy 1F needs to support smart growth principles and link highway improvements with smart growth decisions. State highway infrastructure should not be considered "free" infrastructure for large developments. Local government and developer financial contributions to solving highway deficiencies that are directly caused by new growth decisions is a useful tool towards smart growth decisions.

Very truly yours,



Peter C. Martin
Transportation Engineer



November 18, 2011

Land Conservation and Development (LCDC)
635 Capitol Street NE
Salem, OR 97301-2532

Oregon Transportation Commission (OTC)
1158 Capitol Street NE
Salem, OR 97301

Dear Commission Members:

Thank you for the opportunity to comment on the proposed amendments to the Transportation Planning Rule (TPR) and the Oregon Highway Plan (OHP). TriMet strongly supports the new direction proposed for both policy documents. The amendments will help our region implement the 2035 Regional Transportation Plan (RTP) and the 2040 Growth Strategy, both of which rely heavily on the provision of more transit service and transit-oriented development.

The only way this region can accommodate expected growth is to provide more opportunities for people to live, work, shop, and play in places where they can walk, bike and ride transit. We can't afford to have transit- and pedestrian-oriented development blocked simply because it happens to be near a freeway or state highway. Research conducted by Reconnecting America for the Federal Transit Administration, identified Portland as among the top 10 U.S. cities with the most significant growth in demand for housing in transit zones in coming years. The proposed amendments will help communities design and build more transit-oriented development, meeting market demand, and making the region more livable while accommodating more people.

The policy changes proposed will also need to carry forward into changes to a series of implementing documents, like the Oregon Highway Design Manual, in order to ensure this new policy direction really makes a difference. We look forward to seeing the TPR and OHP amendments enacted in December and encourage the state to develop a work plan for those necessary changes to implementing documents. Thank you for your leadership on these efforts.

Sincerely,

A handwritten signature in blue ink that reads "Neil McFarlane".

Neil McFarlane
General Manager



November 18, 2011

Land Conservation and Development Commission
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Dear Commission Members:

JEFF EAGER
Mayor

Thank you for the opportunity to comment on the Oregon Highway Plan (OHP) Policy 1F and the Transportation Planning Rule (TPR) 060 proposed changes. I would like to thank the Commissions for their open and inclusive process and for inviting City staff to participate on the TPR committee.

JODIE BARRAM
Mayor Pro Tem

OHP Policy 1F Comments

TOM GREENE
City Councilor

The City supports the change from mobility "standards" to "targets". Targets will allow other factors such as local land use and economic development plans and goals to be better considered when evaluating highway system performance. This change will also open opportunities for a broader range of design and safety solutions for the highways in our region and throughout Oregon.

KATHIE ECKMAN
City Councilor

JIM CLINTON
City Councilor

MARK CAPELL
City Councilor

SCOTT RAMSAY
City Councilor

Exempting land use proposals that will have small increases in traffic is supported by the City. Bend relies on the vitality of our small business which greatly supports the local economy. Minimizing the demands to those types of businesses will improve the local and statewide economies.

ERIC KING
City Manager

Central Oregon will be embarking on the TRIP 97 planning process over the next year. This process will explore innovative ideas and solutions concerning highway performance measures that include mobility standards. We fully anticipate that area and/or corridor mobility targets will be a key outcome of that process. The proposed revisions to the OHP will help facilitate implementation of those alternate targets.

The City also supports the new technical latitude for ODOT in evaluating impacts of plan amendments proportionate to existing conditions. The change will allow facility providers the needed flexibility to support land use

changes that advance local plans, goals and policies and reach practical design solutions for meeting transportation system needs.

There are three areas the City would recommend further analysis and discussion, which is similar to the Bend MPO comments.

1) Page 8, lines 12-13 – Action 1F.1

The draft currently references “mainline speed”. We believe that language should be amended to read “prevailing speeds during peak periods.” Forecasts show heavy traffic volumes on the highways in Bend. Those volumes will result in prevailing speeds being lower than posted speeds. Changing the wording as listed above will ensure that traffic analyses use actual conditions.

2) There is concern that reduced mobility targets may be used to rationalize not planning for, or providing, needed long-term transportation system improvements. This is especially true today when there are significant constraints on the short-term availability of funding. Financial constraints may make it difficult to implement projects in the short-term that are needed to meet long-term land use and economic development goals. We understand and accept this reality. The following language could be inserted in the OHP to address this issue:

Where financial constraints make achieving targets difficult in a limited planning horizon, having a plan horizon beyond 20 years may be needed if its helps achieve long-term economic, land use, and environmental plans, goals and objectives.

3) Please consider and further analyze the apparent lack of consistency between the OHP and the Highway Design Manual. The proposed OHP revisions will exacerbate the differences between the OHP and the Highway Design Manual (HDM) and possibly other ODOT policies. While not necessary for inclusion in the OHP, we would like the OTC to commit to a process to revise the HDM and other implementing documents to ensure better alignment with the OHP.

Transportation Planning Rule Comments

The City is supportive of the process to find ways to improve the 060 TPR sections. The City recognizes and appreciates the time and level of effort that went into the current draft amendments by the ODOT and DLCD staff and the participants on the stakeholder committee. The following are specific comments from City of Bend Transportation and Planning staff concerning Sections 9, 10 and 11.

Section (9)

The City strongly supports the broad majority of the stakeholder committee recommendation for Option #1 concerning the consistency between the comprehensive plan and the zone map. This one change is significant and would greatly clear up the issues about zone changes and transportation impacts. The City encourages the Commissions to simplify the TPR zone change process with this straightforward recommendation.

Section (10)

The proposed new section (10) is an improved option for establishment of urban mixed-use areas rather than going through a TPR analysis under the current rule, which allows for a 10% reduction (and perhaps more in some instances) in projected trips, but still requires the determination of whether there is a significant effect. The City suggests improving the section regarding timing and procedures. The text sets up a two-step process, where the boundary of an MMA is established and acknowledged in advance of an amendment that rezones the MMA, which occurs through a separate, subsequent process. One reading would have the initial step, establishment of the acknowledged MMA, subject to sections (1) and (2) of the TPR; only subsequent plan amendments, after acknowledgement, would be exempt --- this is likely not the intent of this change.

Practically, a local jurisdiction will wrap all needed amendments to a comprehensive plan and its functional components and run them through the public adoption process at the same time. For example, an MMA would be created by adopting comprehensive plan policy and map amendments at the same time as the zoning code text and map amendments that create and apply MMA zoning districts, with appropriate development standards insuring consistency with the definition of an MMA.

A one-step process makes more sense because interested parties, the service providers with jurisdiction over surrounding transportation facilities, the appointed and elected review bodies and DLCD will likely want to see the plan policies and zoning regulations at the same time as determining the boundaries of the MMA. The proposed text allows this approach in subsection (e), but since the one-step process is more likely, the rule should be written in anticipation of this upfront. Please see City recommended text edits below.

Other comments relate to the standards in the first paragraph of section (10) regarding safety, network connectivity and freight accessibility --- it is uncertain how these would be evaluated at the time that an MMA is established. They are site development or public improvement standards that will be evaluated at the time of development. In the recommended edits below these standards are moved to subsection (E) under the definition of an MMA which will require that

the MMA regulations take these factors into account and apply appropriate measures at the time of development.

Finally, subsection (c) gives a “mainline” provider substantial discretion with only direction as to what to “consider.” There is an option for an agreement between the provider and the local government if issues are encountered but doesn’t give clear guidance on what must occur to make sure an agreement can be reached. Better guidance and incentives to encourage agreement from the provider would be an improvement to this section.

Suggested edits to Section 10 in ~~strikeout~~/replace format on the October 25, 2011 Public Review Draft

(10) Notwithstanding sections (1) and (2) of this rule, a local government may amend a functional plan, a comprehensive plan or a land use regulation without applying adopted performance standards related to motor vehicle traffic congestion ~~(e.g. volume to capacity ratio or V/C)~~, delay or travel time if the amendment meets the requirements of subsection (a) of this section. This section ~~does not exempt a proposed amendment from other transportation performance standards or policies that may apply including, but not limited to, safety for all modes, network connectivity for all modes (e.g. sidewalks, bicycle lanes) and accessibility for freight vehicles of a size and frequency required by the development.~~

- (a) A proposed amendment qualifies for this section if it:
 - (A) is a map or text amendment affecting only land entirely within a multimodal mixed-use area (MMA); and is consistent with the definition of an MMA as described below; and or
 - (B) is a map or text amendment creating an MMA and is consistent with the definition of an MMA as described below. ~~and consistent with the function of the MMA as described in the findings designating the MMA.~~
- (b) For the purpose of this rule, “multimodal mixed-use area” or “MMA” means an area:
 - (A) with a boundary adopted by a local government as provided in subsection (d) or (e) of this section and that has been acknowledged or will be submitted to DLCD for acknowledgement;
 - (B) entirely within an urban growth boundary;
 - (C) with adopted plans and development regulations that allow the uses listed in paragraphs (8)(b)(A) through (C) of this rule and that require new development to be consistent with the characteristics listed in paragraphs (8)(b)(D) through (H) of this rule;
 - (D) with land use regulations that do not require the provision of off-street parking, or alternately, regulations that require lower levels of off-street parking than required in other areas and allow flexibility to meet the parking requirements (e.g. count on-street parking, allow long-term leases, allow shared parking); and

- (E) that has development regulations that ensure safety for all modes, network connectivity for all modes (e.g. sidewalks, bicycle lanes) and accessibility for freight vehicles of a size and frequency required by the development; and
- (F) (E) located in one or more of the categories below:
- (i) at least one-quarter mile from any interchange exit ramp terminal intersection;
 - (ii) within the area of an adopted Interchange Area Management Plan (IAMP) and consistent with the IAMP; or
 - (iii) within one-quarter mile from any interchange ramp terminal intersection if the mainline facility provider has provided written concurrence with the MMA designation as provided in subsection (c) of this section.
- (c) When a mainline facility provider reviews an MMA designation near an interchange, the provider must consider the factors listed in paragraph (A) of this subsection.
- (A) The potential for operational or safety effects to the interchange area and the mainline highway, specifically considering:
- (i) whether the interchange area has a crash rate that is higher than the statewide crash rate for similar facilities;
 - (ii) whether the interchange area is in the top ten percent of locations identified by the safety priority index system (SPIS) developed by ODOT; and
 - (iii) whether existing or potential future traffic queues on the interchange exit ramps extend onto the mainline highway or the portion of the ramp needed to bring a vehicle to a full stop from posted mainline speeds.
- (B) If there are operational or safety effects as described in paragraph (A) of this subsection, the effects may be addressed by an agreement between the local government and the facility provider regarding traffic management plans favoring traffic movements away from the interchange, particularly those facilitating clearing traffic queues on the interchange exit ramps.
- (d) A local government may designate an MMA by adopting an amendments to the comprehensive plan and/or land use regulations to delineate the boundary of the MMA and to put in place policies and regulations necessary for the amendments to meet the definition of an MMA following an existing zone, multiple existing zones, an urban renewal area, other, or establishing a new boundary. The designation amendments must be accompanied by findings showing how the area meets the definition of an MMA. Designation of an MMA is not subject to the requirements in sections (1) and (2) of this rule.
- ~~(e) A local government may designate an MMA on an area where comprehensive plan map designations or land use regulations do not meet the definition, if all of the other elements meet the definition, by concurrently adopting comprehensive plan or land use regulation amendments necessary to meet the definition. Such amendments are not subject to performance standards related to motor vehicle traffic congestion, delay or travel time.~~

Section (11)

The following comments pertain to the proposed additions found in 660-012-0060 (11). An overarching comment is to provide more specific, objective, and measurable definitions of new terms utilized in proposed language. Subjective terms will become the basis for legal appeals, thus reducing or eliminating the benefits that are desired. The City realizes this was a difficult section for the stakeholder committee to create and review. The following is intended to help the discussion.

For example, terms such as “create direct benefits,” “net developable area,” should be further defined. Please consider that “Direct benefits” may be worth defining or striking since it is an operative term. “Net developable area” should be further defined to include the area of the site or building, and what qualifies as being removed from gross acreage or building area to arrive at the net developable area.

The exclusions in sub-section (C) are well meaning, but may contribute to additional congestion along corridors in large and small communities, and thus, may negatively impact regional mobility as a whole. One way to address this would be to decrease the size of the population to 5,000 so that fewer communities qualify for the exception. Another way to mitigate this potential consequence is to limit the number of exceptions granted under sub-section (C) within a region or county. Yet another mitigation measure may be to require some percentage of the employment to be “industrial” or “traded sector” as in sub-section (A). If this sub-section is preserved as is, we recommend further defining the number of years the annual average unemployment rate must be calculated. For example, is it only one year, or multiple years to meet this requirement? We suggest adding a requirement to (iii) so that the annual average unemployment rate in the county is greater than the state average for two or three years. It may also be advisable to cite the required data source for such a calculation such as the Oregon Employment Department’s publications containing unemployment rates.

Language in (b) is could be tied up in litigation, and may be difficult to implement for time sensitive economic development projects. The Commissions and staff should review carefully the requirement that the “local government determines that the benefits outweigh the negative effects on local transportation facilities” for precision and objectivity. For instance, specify what this benefit cost analysis contains such as objective measures of benefits (estimated value of improvements) or numbers of employees, demonstrated average wages, or construction costs to demonstrate “benefits.” Likewise, objective measures for transportation improvements could be established like the construction of multi-modal improvements such as sidewalks, trails, bike lanes, transit stops, or projects that improve a defined system

performance. The need for flexibility is certainly warranted however without some objective measures there could be costly and subjective benefits/cost analysis, and this could enable opponents of projects to object to the analysis, conclusions, and create a basis for appeal.

Similarly, "coordination" as used in (b) and (c) is not well defined and vague. Necessitating coordination with such a large number of state agencies also invites conflict and creates grounds for appeal. Coordination with DLCD and ODOT is already allowed in the land use application process, and is redundant. Using terms such as "all transportation providers" is overly broad and difficult to recognize what and who are transportation providers. In any controversial project, it is likely that each entity mentioned in (c) will have different positions and desired outcomes, and that resolving differences of opinion regarding whether proposed amendments meet the definition of "economic development" and "how it would affect transportation facilities and the adequacy of proposed mitigation" would be practically impossible. We recommend striking all of (c) for these reasons. If the language is preserved, we recommend making a clear statement that "Agreement is not required as a result of coordination."

Thank you for the opportunity to comment and look forward to the further discussion and hearings on the topics.

Sincerely,



Eric King, City Manager



Forest Park Neighborhood Association
C/O Neighbors West Northwest
2257 NW Raleigh
Portland, Oregon 97210

November 21, 2011

Oregon Transportation Commission
1158 Chemeketa Street NE
Salem, OR 97301

Land Conservation and Development Commission
635 Capitol Street NE
Salem, OR 97301

Re: Proposed Revisions to Oregon Transportation Planning Rule 0060
and Oregon Highway Plan Policy 1F (Mobility Standards)

Dear Commission Members,

We appreciate the opportunity for the community to comment on the proposed amendments to the Transportation Planning Rule (TPR) 0060 and the Oregon Highway Plan (OHP) Policy 1F.

Forest Park Neighborhood Association (FPNA) is chartered by the City of Portland. Our neighborhood is located in the hills northwest of urban Portland, an area with many natural resources and steep hills surrounding the 5000 acres of Forest Park. We have a strong interest in supporting land use policies that make efficient and effective use of the land inside the UGB, that provide greater opportunities for economic development, and that reduce development pressures outside the UGB. We support smart redevelopment that upgrades basic infrastructure for existing urban communities while providing more amenities within walking distance of existing homes and businesses.

We thus support the proposed changes to the TPR and OHP. These changes will help the Portland metropolitan region to accommodate population growth in more efficient ways. They can also help reduce greenhouse gas emissions by encouraging thoughtful mixed-use development and redevelopment, and by encouraging development of multi-modal corridors, a policy direction supported by the 2035 Regional Transportation Plan.

We concur with comments from Metro and City of Portland. We hope that you will give serious consideration to specific changes suggested by City of Portland.

Thank you for your thoughtful work on these issues. We look forward to adoption and implementation of these important changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Grossnickle". The signature is fluid and cursive, with the first name "Jerry" being more prominent than the last name "Grossnickle".

Jerry Grossnickle, President
Forest Park Neighborhood Association



Community Development
Planning Division
501 SW Madison Avenue
P.O. Box 1083
Corvallis, OR 97339-1083
(541) 766-6908
FAX (541) 754-1792

November 18, 2011

ODOT - Transportation Development Division
Attn: Michael Rock
555 13th Street NE, Suite 2
Salem, OR 97301-4178

Re: Proposed Oregon Highway Plan Revisions

Dear Oregon Transportation Commissioners,

I am writing to provide formal comment on behalf of the City of Corvallis regarding the proposed revisions to the Oregon Highway Plan, including changes to mobility standards, to Policy 1F, and to Tables 6 and 7. We believe the draft revisions are a step in the right direction, and will make it easier for local jurisdictions to attract economic development and to advance other important community goals. Generally, we are supportive of the proposed changes, but have specific comments and concerns identified below.

First of all, we support the proposal to exempt plan amendments that would result in a small increase in traffic from the necessity of demonstrating compliance with the Transportation Planning Rule. Within the last five years we have had a number of annexation proposals fail to pass muster with ODOT staff because of a very small anticipated increase in trips at an affected intersection (in one case, the proposal was estimated to generate seven additional peak hour trips). This creates a hugely disproportionate situation that either stymies development entirely, or that places a significant burden on a relatively small-scale development. We also applaud the use of clear criteria in determining what constitutes a small increase in trips. This will make it transparent to staff and applicants whether or not a proposal would qualify for this exemption.

Although we are not entirely clear on the distinction between making trip generation assumptions based on "planned development" vs. "full development," it is our understanding that this change is intended to reflect trip generation assumptions based on an average level of development instead of a worst-case level of development. We believe this is the correct methodology for transportation planning, as a Transportation System Plan developed under the assumption that all potential development will be the most trip-intensive possible would result in significantly overbuilt transportation infrastructure. Transportation planning should be grounded, as much as possible, in a realistic assessment of future development patterns.

The proposal to streamline the development of alternate mobility targets, and to consider measures other than volume to capacity ratios (v/c) in assessing mobility is a welcome change. We believe that measuring (v/c) exclusively in assessing mobility within the transportation system fails to accurately capture the full picture of mobility in our community. For example, we

Page 1

"A Community that Honors Diversity"

note that 2010 US Census Data finds that Corvallis leads the nation in the percentage of residents who travel by bicycle and ranks second nationwide for pedestrian commuters in urbanized areas.


We are also supportive of changes that will clarify and streamline the implementation of access management by ODOT, as well as enhanced coordination between the planning and design sections of ODOT. Citizens and development interests will be more satisfied with the agency if agreements reached regarding transportation improvements as part of the planning process are honored and supported when it comes time for review and approval of designs for roadway improvements. Better coordination and communication in this area will be very welcome.

Lastly, we support the proposed changes to mobility targets shown in Tables 6 and 7. Although we recognize that these changes may result in higher congestion in state transportation facilities, we believe this is an appropriate time to balance that concern with the inhibiting effect mobility standards can have on economic development in the state.

One overarching concern we have with the proposed OHP changes is that, with the exception of the revisions to mobility targets in Tables 6 and 7, implementation of all other measures will rely on ODOT staff administration of the policy changes. We ask that you put in place a clear and direct communication and training program to ensure that all line staff understand and support the new direction articulated in the revised Highway Mobility Policy.

I thank you for your work in advancing these improvements to the Oregon Highway Plan and encourage you to adopt the proposed revisions, along with a comprehensive implementation program.

Respectfully,


Julie Jones Manning
Mayor, City of Corvallis

cc. Ken Gibb, Community Development Director, City of Corvallis
Mary Steckel, Public Works Director, City of Corvallis

BEND METROPOLITAN PLANNING ORGANIZATION

575 NE 15th Street, Bend, OR 97701

www.bendmpo.org

November 18, 2011

MARK CAPELL, CHAIR
City of Bend Council

ANTHONY DEBONE,
VICE-CHAIR
Deschutes County Commission

BOB BRYANT
ODOT Region 4

KATHIE ECKMAN
City of Bend Council

TOM GREENE
City of Bend Council

TYLER DEKE
Manager

JOVI ANDERSON
Program Technician

ODOT Transportation Development Division

Attn: Michael Rock

555 13th Street NE, Suite 2

Salem, OR 97301-4178

Re: Oregon Highway Plan Mobility Standard Revisions

Dear Mr. Rock,

Thank you for the opportunity to comment on the proposed amendments to the Oregon Highway Plan.

We support the shift from mobility "standards" to "targets." While overall performance of the transportation system will remain a priority, a switch to "targets" will allow other factors (e.g. local land use and economic development plans and goals) to be better considered when evaluating highway system performance. This change will also allow for a broader range of design and safety solutions for the highways in our region and throughout Oregon.

We support the change to exempt land use proposals that will have small increases in traffic. Small businesses are the backbone of our local economy. Minimizing the demands to those types of businesses will improve the local and statewide economies.

We support the call for an enhanced and more flexible alternate mobility target process. The communities along US 97 in Central Oregon will be embarking on the TRIP 97 planning process over the next year. We fully anticipate that area and/or corridor mobility targets will be a key outcome of that process. The proposed revisions to the OHP will help facilitate implementation of those alternate targets.

We support the new technical latitude for ODOT in evaluating impacts of plan amendments proportionate to existing conditions. The change will allow facility providers the needed flexibility to support land use changes that advance local plans, goals and policies and reach practical design solutions for meeting transportation system needs. We acknowledge, however, that these changes may increase congestion at intersections and road segments in our region and throughout the state.

While we support the vast majority of proposed changes, we do offer a few comments and a recommendation for future work.

1) Page 8, lines 12-13 – Action 1F.1

The draft currently references “mainline speed.” We believe that language should be amended to read “prevailing speeds during peak periods.” Forecasts show heavy traffic volumes on the highways in Bend. Those volumes will result in prevailing speeds being lower than posted speeds. Changing the wording as listed above will ensure that traffic analyses use actual conditions.

2) Mirroring comments from Washington County, we are also concerned that reduced mobility targets may be used to rationalize not planning for, or providing, needed long-term transportation system improvements. This is especially true today when there are significant constraints on the short-term availability of funding. Financial constraints may make it difficult to implement projects in the short-term that are needed to meet long-term land use and economic development goals. We understand and accept this reality. We do not, however, want these short-term financial constraints to be used as a reason to accept significantly reduced mobility standards over the long term. The following language could be inserted in the OHP to address this issue: Where financial constraints make achieving targets difficult in a limited planning horizon, having a plan horizon beyond 20 years may be needed if it helps achieve long-term economic, land use, and environmental plans, goals and objectives.

3) Consistency between the OHP and the Highway Design Manual

While we strongly support adoption of revised mobility targets, those revisions will exacerbate the differences between the OHP and the Highway Design Manual (HDM). While not necessary for inclusion in the OHP, we would like the OTC to consider entering into a process to revise the HDM and other implementing documents to ensure better alignment with the OHP.

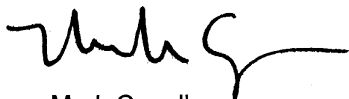
4) Future review

Lastly, we encourage the OTC to consider a future review of the mobility changes as well the access management changes to be implemented through SB 264. The review should assess the combined impacts of these changes to ensure safety is not compromised.

Thank you for providing an opportunity to comment on the proposed changes to the OHP. We look forward to adoption and implementation of these changes. The revised policies will help our region implement existing and future plans that support mixed-use neighborhoods and a mix of travel modes.

Please contact me if you have any questions. I may be reached at 541-420-8883 or mcapell@ci.bend.or.us. Thank you for your time and consideration.

Sincerely,



Mark Capell
Chair, Bend MPO Policy Board

cc: BMPO Policy Board



3415 Commercial St. S.E. • Suite 117 • Salem, OR 97302-5169 • (503) 399-1701 • FAX (503) 399-8082

November 21, 2011

Oregon Transportation Commission
ODOT –Transportation Development Division
Attn: Michael Rock
555 13th Street NE, Suite 2
Salem, OR 97301-4178

E-mail to Michael.D.Rock@odot.state.or.us

Re: Proposed Amendments to Oregon Highway Plan

Dear Oregon Transportation Commission Members:

On behalf of our 60,000 Oregon member families and 32 county Farm Bureau's, the Oregon Farm Bureau hereby provides the following comments with regard to the proposed Oregon Highway Plan mobility amendments.

Please include these comments in the record of these proceedings and provide the Bureau with future notices of any revisions to the proposed amendments or any actions with regard to the proposed amendments.

The proposed amendments would include across-the-board increases in volume-to-capacity ratios, and changes minimum mobility standards to "targets" to permit increased congestion on highway facilities throughout the state. This increase in congestion has been explained as being necessary because "[m]any segments of the state highway system, *located primarily in urban areas*, do not now meet ODOT's standards for mobility due to growing levels of congestion" and that these mobility standards are a "hindrance to increasing development intensities – *especially in urban centers*." January 31, 2011, *OHP Mobility Standards Discussion Paper*, p. 4 (Emphasis added); Fall 2011, *ODOT Oregon Highway Plan Mobility Standard Revision, Public Review Draft* (Emphasis added). Cities have been in favor of these amendments because they encourage dense urban areas, by permitting greater congestion in Mixed-Use Multi-Modal (MMA) areas where people can walk, or bike or take public transportation to get to their homes, offices, or shopping.

However, the amendments do not consider impacts on rural highways. The MMA or walkable neighborhoods may be appropriate in the Metro area and other cities but they're not going to work in rural areas where Oregon's Statewide Planning Goals 3, 4 and 14, restrict development on resource lands and limit density. Increasing the level of

minimum mobility does not encourage more compact development in rural areas – where it does not belong - but will only increase congestion in rural areas.

This increase in congestion is going to harm one of the stable segments in Oregon's economy – its agriculture. In 2009, Oregon agriculture accounted for 15% of all agricultural activity in the state, and was credited with adding more than \$22 billion to Oregon's net state product. While there have been declines in areas such as nursery crops and grass seed, Oregon's agricultural sector continues to provide stability to the state's economy during these troubled economic times.

Yet, while agriculture as whole remains strong, many individual farmers are struggling. In 2007, nearly two-thirds of Oregon farms reported net losses, with increasing in production costs - particularly fuel costs and fertilizer costs – cutting into profits. The proposed increase in congestion will further harm Oregon farmers, and Oregon's economy.

Increased Congestion Under Table 6

Under the OHP, most state highways in rural areas and unincorporated communities are designated with a maximum volume-to-capacity ratio of .70, with some facilities designated .75, and only district/local roads interest roads designated at .80. Under the proposed amendment to Table 6, most facilities in rural and unincorporated communities would have traffic congestion increased by 10%, with most facilities now designated at .80 or .85, and only a few designated at .75. Many of these changed standards are the same standards that are applied to urban facilities now, including some MPO facilities.

Increasing congestion means increasing production costs, as farmers expend more fuel and more labor to move the same amount of commodities, crops, livestock and poultry on state's highway system. Moreover, unlike other forms of freight, farm products are often directly and adversely impacted by delays in shipping. Delays in transit have severe adverse impacts on the freshness of produce, stress livestock and poultry, and result in greater costs and waste, with less profit to the farmer.

Increase congestion also increases risks of accidents with increased machinery costs, insurance premiums, injuries, lost work days, and potential loss of life. Rear-end collisions comprise almost half (47%) of the collisions in cities and urban areas under the current urban mobility standards, and are a common indicator of congested conditions. With these standards applied to rural facilities an increase in similar collisions – including potentially fatal collisions with large trucks and heavy equipment - is anticipated.

As the proposed increases in congestion on Table 6, are a means to encourage higher urban densities in urban core areas, and would have adverse effects on Oregon's

farmers and agricultural economy, the Farm Bureau requests that the OTC retain the current and mandatory mobility designations for rural and unincorporated communities and preserve the economy of Oregon's rural communities.

"Targets" and "Small Increase in Traffic."

The Oregon Farm Bureau is also concerned about two potential changes to the OHP to allow development that exceeds the "maximum volume to capacity ratios" in Table 6. The OHP currently states that its maximum levels of congestion "shall not be exceeded." The amendments provide two ways to exceed the "volume to capacity ratio targets."

1. Alternative "Targets"

Under the proposed amendments, a local government can exceed the "volume to capacity ratio targets" if someone determines that its "infeasible or impractical" to meet the target. The Oregon Farm Bureau is concerned about this amendment because it does not say who will make the determination of whether it is "infeasible or impractical" to meet the "target", or guarantee that all interested parties will get a seat at the table when the decision is made to adopt a separate "target."

While we are sensitive to ODOT's lack of funding to provide transportation improvements, we are also aware that the state's funding priorities for the transportation facility are most often concentrated on high-volume urban facilities, and not on farm-to-market roads. In many cases, these highways provide the only means for a farm or a collection of farms to remain competitive by getting their produce to market. Increasing congestion on these rural highways should be a last resort, and should only be allowed where there is no alternative and, even then, only when the people impacted by the change have had a chance to be heard.

The Farm Bureau would support an amendment that would retain the existing maximum volume to capacity ratio as a maximum, but allow for an increase in the maximum if ODOT evaluates all reasonable alternatives and makes a determination that there is no other alternative to increasing the standard as part of a hearing process that allows the people impacted by the proposed development to be heard on the alternatives considered and to be adopted.

2. Small Increases in Traffic

The OHP amendments also propose to count 400 to 1001 trips as "no further degradation" to facilities that won't meet mobility targets, without any notification or hearing process.

While 400 to 1001 trips may be “small increases in traffic” in some urban areas – these are not small increases for rural areas. Many rural areas are served by older, lower-volume highways that are often not developed to modern highway standards. Moreover, there is nothing to stop a series of “small” amendments from impacting the same rural facility. Where rural facilities are already over the maximum volume to capacity ratios in Table 6 in rural areas, new amendments should not be allowed to increase trips on these facilities.

The Oregon Farm Bureau would support an amendment that would not permit “small increases in traffic” on highways outside of urban growth boundaries.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'Shawn Cleave', with a long, sweeping horizontal line extending to the right.

Shawn Cleave
Government Affairs Specialist,
Oregon Farm Bureau
3415 Commercial St
Salem, Oregon 97302

November 16, 2011

Mr. Michael Rock
Transportation Planner – Long Range Planning Unit
Oregon Department of Transportation
555 13th Street N.E., Suite 2
Salem, OR 97301-4178

Dear Mr. Rock:

Thank you for allowing us to comment on the proposed amendments to the Oregon Highway Plan. My name is Toby Bayard. I am speaking on behalf of the Hunnell United Neighbors, Inc. (HUNS), a land use and transportation neighborhood advocacy group that represents over 200 rural residential property owners in Bend's north end.

The HUNS fully support ODOT's efforts to revise the Oregon Highway Plan Policy 1F (Highway Mobility Standards), specifically, to shift from mobility standards to more flexible mobility targets. As Oregon's cities strive to achieve a more compact urban form, compromises on how congestion is defined are most appropriate. Further, multimodal transportation solutions will never get traction without congestion; people will always opt to drive if it is the path of least resistance and if energy costs permit. Congestion is only negative by definition – it could also be considered positive if such congestion moves us toward a more energy-independent future.

The HUNS board believes that shifting from standards to targets will allow consideration of other factors such as local land uses and economic development plans when evaluating a highway system's performance. We are very concerned with the health of our local economy and the preservation of rural areas and feel that "common sense must prevail" when it comes to spending public funds to relieve what might be considered congestion in one locale, when in another, the same level of "traffic throughput" (e.g., volume to capacity) might be considered "light traffic".

True, the congestion may not favor freight-oriented through-trips but there are options to mitigate delays (rail, or the shifting of trips to off-peak hours, as is routinely done in Europe). Rigidly defining congestion, based on highway-focused standards, makes more sense when funding is readily available and local economies more robust. Currently, congestion is something we must accommodate in a flexible manner, given Oregon's very difficult economy. Old thinking must give way to new.

Bend's US97 North Corridor Provides an Example of Why This is Important

An example of why flexibility is important can be found in Bend, where ODOT has issued a Draft Environmental Impact Statement (DEIS) for its US97 Bend North Corridor Project in compliance with NEPA. US97 serves as the major north-south freight corridor east of the Cascade Mountains and has been designated as an expressway between south Redmond and Bend's Empire Avenue.

The US97 Bend North Corridor Project's purpose is: "to improve safety and mobility for trucks and automobiles on US97". It cites three objectives, one of which is to: "support economic development consistent with local agency plans; minimizes impacts to existing and planned local economic base".

Regrettably, just south of the US97 Bend North Corridor area, the expressway becomes duplexed with (shares the same path with) Bend's 6.9 mile long Parkway. The Parkway cuts through the heart of Bend, has a design speed of 45 MPH, features closely spaced on / off ramps, and is optimized for local trips. It cost Oregon taxpayers \$112 million when it opened in 2001, over \$30 million more than

originally projected. The project's funding was originally intended to produce a "bypass" around Bend. Instead, ODOT chose to acquiesce to its Steering Committee, which indicated a preference for a more central route. At ribbon-cutting, the Bend Parkway / US97 became the de facto route of choice for local trips at Bend's north end. And the moment it did, the result was v/c problems.

ODOT states that 75 percent of the trips on North US97 at the Robal and Cooley Road intersections is local. Local trips impinge on freight-focused through trips, which represent slightly over 3 percent of total trips. The Project seeks to close the Cooley and Robal Road intersections and divert local trips to local roads (which area already congested), so that freight trips (about 3 percent of total trips) flow more smoothly. The Project's justification is based on a need to comply with the OHP's v/c standards. Its cost is estimated at \$200 million.

The Cooley and Robal Road intersections provide access to a regionally important shopping area that draws customers from Deschutes, Crook and Jefferson counties. To close them because they do not meet ODOT's mobility standards for an expressway will devastate local businesses -- businesses that pay city of Bend and Deschutes County taxes, provide much-needed jobs and offer local residents a "complete shopping experience". The shopping area's developers made huge investments, as did the businesses that located there. Compare the value of those investments, taxes and jobs to the value of speeding up freight movement through Bend. Our local community's needs should not be inflexibly deemed as secondary to those of commercial freight unless a very sound business case can be made that, all things considered, doing so offers the "greatest good" for Oregon's tax paying public.

The "failure" of an intersection is an "arbitrary" concept and must be balanced with safety, local road mobility, and the economic needs of a community. The HUNS are keenly aware that the health of our community rests on the health of our existing economic base. We support the Cascade Village Shopping Center, Bend Associates Mall and the Newman Development Group / Lowes developers and the businesses that have chosen to invest millions of dollars in Bend's north end with the assurance of ODOT that they would have US97 access. To deny this access is unacceptable.

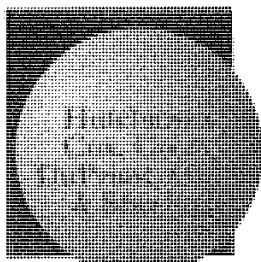
To date, Deschutes County has declined to lend its support to the US97 Bend North Corridor project due to the impacts on its local road network, the business community and rural residential property owners. The simplest and least expensive avenue for ODOT, Deschutes County, the city of Bend and the tax paying public is to have the option of relaxing the mobility standards for US97 in Bend North Corridor area, particularly given that ODOT elected to duplex an expressway with a Parkway optimized for local trips. A TDM/TSM solution to the problems presented in the US97 Bend North Corridor project (as is being pursued for Washington County's Hwy. 217) should also be pursued.

In closing, the HUNS believe that moving from V/C standards to V/C targets represents a common sense approach which recognizes that in this era of tough financial choices, there may not be the funds to achieve "perfect mobility" on State highways. Even if there were funding for this project, it may come at the expense of other projects that have equal or greater social and economic value.

Thank you for considering the HUNS' comments.

A handwritten signature in black ink, appearing to read "Toby Bayard", with a long horizontal line extending to the right.

Toby Bayard, Call to Action Coordinator / Secretary – Hunnell United Neighbors, Inc.
Based on input developed by the HUNS' Board of Directors



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November 21, 2011

Sent Via First Class Mail and E-mail to Michael.D.Rock@odot.state.or.us

Oregon Transportation Commission
ODOT –Transportation Development Division
Attn: Michael Rock
555 13th Street NE, Suite 2
Salem, OR 97301-4178

Re: **Proposed Amendments to Oregon Highway Plan**
Our Clients: Willamette Oaks LLC; David and Joan Setniker
Our File No.: 9083/10855J

Dear Oregon Transportation Commission Members:

Our firm represents Willamette Oaks LLC, and David and Joan Setniker, Oregon business owners and farmers who are concerned with the proposed amendments to the OHP and its impacts on transportation facilities in Oregon. We write to provide additional testimony following our written and oral testimony submitted at the November 16, 2011 hearing.

Please include this letter in the record of these materials and include our firm on the list of parties receiving future notices associated with the proposed amendments, as well as a copy of any adopted final transportation policy plan amendments and findings.

1. Increasing Congestion to Support Mixed-Use Multimodal Neighborhoods

Encouraging Multimodal Mixed-Use Development in higher density urban centers is one of the primary rationales put forward for modifying the OHP standards. The proposed amendments recognize that:

"The targets set for Regional and District Highways in STAs and highly urbanized areas allow for lower vehicular mobility to better balance other objectives, including a multimodal system. In these areas traffic congestion will regularly reach levels where peak hour traffic flow is highly unstable and greater traffic congestion will occur." Public Review Draft, p. 2, lines 14-18 (Emphasis added).

The rule, however, provides for an increase in congestion on these highly urbanized facilities without actually requiring multi-modal development to offset the increase in congestion.

The Transportation Planning Rule recognizes that “mixed-use pedestrian-friendly neighborhoods” generate 10% fewer daily trips and peak hour trips, and incorporate these reductions into analysis of a proposal’s impact on transportation facilities. OAR 660-012-0060(6). Thus, the TPR already factors in pedestrian-friendly development in urban centers in the volume-to-capacity ratio under the OHP because it already reduces the volume by at least 10%.¹ It is unnecessary to increase maximum volume-to-capacity ratios to encourage walkable neighborhoods, as walkable neighborhoods decrease volume-to-capacity under the current TPR.

It was also suggested at the November 16th hearing that proposed increases in congestion in urban centers would dovetail with the proposed amendments to the TPR with regard to “multimodal mixed-use areas.” See Draft Amendments to TPR 0060 – Public Review Draft – October 25, 2011 (Draft), OAR 660-012-0060(10). While no “multimodal mixed use area” amendment to the TPR has been adopted, the proposed amendment would permit a local government to except specified “multimodal mixed use area[s]” from “applying performance standards related to motor vehicle traffic congestion (e.g. volume to capacity ration or V/C), delay or travel time.” *Id.* These areas will be defined by adopted boundaries by the local government.² Draft OAR 660-012-0060(10)(b). Hence, it is unnecessary to increase maximum volume-to-capacity ratios to encourage the development in multimodal mixed-use areas, because these areas would be exempt from the maximum volume-to-capacity ratio under the proposed amendments to the TPR.

In the alternative, to the extent that the OTC might still wish to increase volume-to-capacity ratios for multimodal mixed-use areas, the OTC could do so by simply specifying alternative standards for these delineated “MMA”

¹ Moreover, 10% is only the default assumption in the TPR. Local governments are free to adopt “local government standards” or rely on “detailed information about vehicle trip reduction benefits of mixed-use pedestrian friendly development” to establish more significant trip reduction assumptions for their urban centers. OAR 660-012-0060(6).

² Unfortunately, the proposed amendment does not require the multimodal mixed-use areas to incorporate multimodal mixed-use development. Whereas mixed-use pedestrian-friendly neighborhoods are required to incorporate “A concentration of a variety of land uses in a well-defined area” including medium to high density residential development, offices, stores and recreational opportunities in order to encourage alternative modes of transportation, the multimodal mixed use areas are not required to include these characteristics. See Draft OAR 660-012-0060(10)(b)(C)(distinguishing between “allow[ed]” elements and “require[d] development.”)

areas similar to the separate standards that apply to STA areas under the Table 6. This would help to ensure that increasing congestion on state highways is confined to those areas where MMA development is at least allowed.

2. The De Minimis Exception

The TPR provides that for facilities that are failing on the date of an amendment a local government does not need to “assur[e] that the allowed land uses are consistent with the function, capacity and performance standards of the facility” if it “avoids further degradation” to the facility caused by the amendment. OAR 660-012-0060(3). The proposed OHP amendments regarding “no further degradation” at Action 1F.5 create a loophole in this exception by allowing up 1,000 trips per amendment on any facility automatically and without any mitigation. This loophole is not called for in SB 795, and should not be integrated into the OHP.

As there is no limit on the number of amendments that can add such “small increase[s] in traffic” to a facility, this loophole will encourage a death-by-a-thousand-cuts to failing state facilities as numerous “small” developments aggregate to thousands of trips on these facilities. Moreover, as there is no limit on the number of these “small” increases and no oversight, a developer could divide an amendments into one or more parts in order to avoid making financial contributions to maintain the system. For example, an upzoning from low to high-density residential on 20 acres of property that would generate 2,000 additional trips could be broken up into two concurrent 10-acre zone amendment applications each for 1,000 trips. This division would not diminish the impact of the trips of the system, but would automatically eliminate any mitigation associated with the amendments, or contribution to the failing system.

In order to preserve the limited functionality of this failing infrastructure, the OTC should close this loophole and eliminate that “small increase in traffic” exception. To the extent that facilities are already failing, amendments should at least be required to mitigate its own impacts on the system. If this is not possible, the local government should establish an alternative maximum level of performance via an appropriate public process. These failing facilities require the most attention, not the least.

At the hearing, Mr. Whitlow suggested an expansion of the exception to encompass “projected” failures as well as current failures. This is inconsistent with OAR 660-012-0060(3), which *only* applies to facilities failing on the date of an application. Accordingly, this proposal should be rejected.

3. "Targets" Are Not Standards.

As noted by Mr. Whitlow at the hearing on November 16, 2011, the shift away from maximum "standards" to "targets" is enough to make any lawyer "nervous." Words have meaning. Standards are authoritative rules or principles. Targets, by contrast, are merely aspirational goals.

This change in nomenclature reflects a fundamental shift away from the maximum volume-to-capacity ratios that have protected Oregon's highways for more than a decade, and toward a subjective system of "targets" whereby minimum mobility is optional.

The current OHP includes clear and objective standards that establish a baseline of functionality for all highways in the state. The proposed "targets", on the other hand, have been presented as merely a means for opening discussion on mobility. There is no longer a measure of minimum mobility on the Oregon's highway system under the proposed amendments.

SB 795 did not provide for the elimination of Oregon transportation standards. Instead, it required the "development of mobility *standards*, including but not limited to volume to capacity ratios or corridor or area mobility standards." (Emphasis added). While this may envision establishing additional standards with regard to a particular area or corridor, it relies on and does not anticipate the removal of baseline objective standards. Accordingly, the change from "standards" to "targets" in unwarranted and the amendments should be revised to maintain minimum mobility standards.

4. Public Involvement is Key

As observed by ODOT staff in addressing the Oregon 217 System Management Study on November 16, 2011, public involvement is critical in addressing system defects and solutions. Unfortunately, the proposed amendments to the OHP do not provide for an effective means of public involvement in the process.

The "efficient, collaborative process" referred to for developing alternative mobility targets specifies no notice or public hearing to identify issues or be heard concerning the proposed alternative standards. While the OTC would be involved in the adoption of these standards, it would be only at the end of the process when the standards have been established. This would be too late

in the process for meaningful public participation.³ For de minimis (400-1,000 trips) impacts to transportation facilities, no public process of any kind is envisioned. The public will bear the burden of increased trips on failing facilities, or alternative standards when it is impossible to meet maximum mobility standards. It is important to involve the public throughout these processes in order to ensure the transportation system continues to meet their needs.

To the extent that the OTC adopted amendments to the OHP, these amendments must provide a meaningful opportunity for public participation at all phases of the planning process are required by Goal 1, the OTP and the OHP.

5. Ensuring Special Exceptions are Limited to Special Circumstances.

The proposed amendments call for modifications to clear and objective standards based on subjective determinations concerning issues of impracticability of compliance, acceptable and reliable levels of mobility, and a balancing of relevant objectives. The lack of specificity in these subjective provisions will invite abuse of the alternative mobility provisions, by encouraging the use of alternative standards in place of reasonable improvements to the system.

However, alternative mobility standards are deviations from the minimum standards necessary for the protection of capacity on the state highway system. As such, they should be relied upon only in extraordinary circumstances, where a particular area or corridor cannot be brought into compliance with applicable standards. At the very least, a proposal should be supported by the information set out in OAR 731-017-0020 for adjustments or alternatives to traffic performance measures, be considered at a public hearing with notice to interested parties, and be measured against express criteria including:

- a) That the alternative standard is necessary in order to address exceptional or extraordinary circumstances that apply to the transportation facility or corridor that do not apply to other transportation facilities or corridors generally.
- b) That the alternative standard is necessary to allow reasonable use of the transportation facility or corridor to the same extent enjoyed by

³ Moreover, the OTC has significant limits on its own time. It is unlikely that the OTC will be able to get at critical underlying issues in a hearing where parties are afforded three minutes to speak.

- other users of the facility or corridor while resulting in a comparatively trivial detriment to other users of the same facility.
- c) That the alternative standard is the minimum necessary to alleviate the hardship on the party requesting the alternative standard.
 - d) That the alternative standard is not made necessary as the result of a self-imposed hardship resulting from the actions of the party seeking the alternative standard or their predecessors in interest.
 - e) That in the alternative standard will only continue in place as long as the facility remains below minimum mobility standards, and will cease to be effective when the facility meets the minimum standards of the OHP.
 - f) That there is no reasonably practicable alternative to the alternative mobility standard.

These provisions are based on criteria for providing variances to adopted zoning regulations, and, while somewhat subjective, have the benefit of a substantial body of common law interpreting similar provisions. These criteria would ensure that alternative mobility standards are only used in extraordinary circumstance, and would limit abuse of these provisions.

We have included as an attachment a version of the proposed OHP language under Policy 1.F amended to reflect the foregoing points and concerns.

Very truly yours,

HUTCHINSON, COX, COONS,
DUPRIEST, ORR & SHERLOCK, P.C.



William H. Sherlock
Zack P. Mittge

ZPM/erl

Policy 1F: Highway Mobility Policy

It is the policy of the State of Oregon to maintain acceptable and reliable levels of mobility on the state highway system, consistent with the expectations for each facility type, location and functional objectives. Highway mobility ~~targets~~standards will be ~~the initial tool used~~ to identify deficiencies and consider solutions for vehicular mobility on the state system.

Specifically, mobility ~~targets~~standards shall be used for:

- Identifying state highway mobility performance expectations for planning and plan implementation;
- Evaluating the impacts on state highways of amendments to transportation plans, acknowledged comprehensive plans and land use regulations pursuant to the Transportation Planning Rule (OAR 660-12-0060); and
- Guiding operational decisions such as managing access and traffic control systems to maintain acceptable highway performance.

Where it is infeasible ~~or impractical~~ to meet the mobility ~~targets~~standards, acceptable and reliable levels of mobility for a specific facility, corridor or area will be determined through an efficient, collaborative process between ODOT, the public and the local jurisdiction(s) with land use authority. ~~The resulting mobility targets will reflect the balance between relevant~~A proposal for collaborative modification of a mobility standard shall be supported by findings that demonstrate compliance with the following objectives:

- a) That the alternative standard is necessary in order to address exceptional or extraordinary circumstances that apply to the transportation facility or corridor that do not apply to other transportation facilities or corridors generally.
- b) That the alternative standard is necessary to allow reasonable use of the transportation facility or corridor to the same extent enjoyed by other users of the facility or corridor while resulting in a comparatively trivial detriment to other users of the same

facility.

- c) That the alternative standard is the minimum necessary to alleviate the hardship on the party requesting the alternative standard.
- d) That the alternative standard is not made necessary as the result of a self-imposed hardship resulting from the actions of the party seeking the alternative standard or their predecessors in interest.
- e) That in the alternative standard will only continue in place as long as the facility remains below minimum mobility standards, and will cease to be effective when the facility meets the minimum standards of the OHP.
- f) That there is no reasonably practicable alternative to the alternative mobility standard.

The resulting mobility standards will reflect the balance between relevant objectives related to land use, economic development, social equity, and mobility and safety for all modes of transportation. Alternative mobility ~~targets~~standards for the specific facility shall be adopted by the OTC as part of the OHP.

OTC adoption of alternative mobility ~~targets~~standards through system and facility plans should be accompanied by acknowledgement in local policy that state highway improvements to further reduce congestion and improve traffic mobility issues in the subject area are not expected.

Traffic mobility exemptions in compliance with the TPR do not obligate state highway improvements that further reduce congestion and improve traffic mobility issues in the subject area.

Action 1F.1

Mobility ~~targets and targets~~ standards are the measure by which the state assesses the existing or forecasted operational conditions of a facility and, as such, are a key component ODOT uses to determine the need for or feasibility of providing highway or other transportation system improvements. These mobility ~~targets and targets~~ standards are shown in Table 6 and Table 7. For purposes of assessing state highway performance:

- ~~Use the mobility~~ Mobility ~~targets~~ standards below and in Table 6 ~~when initially assessing~~ shall not be exceeded for all state highway sections located outside of the Portland metropolitan area urban growth boundary, except where alternative standards are adopted pursuant to Policy 1F.
- ~~Use the mobility~~ Mobility standards ~~targets~~ below and in Table 7 ~~when initially assessing~~ shall not be heard on all state highway sections located within the Portland metropolitan area urban growth boundary, except where alternative standards are adopted pursuant to Policy 1F.
- For highways segments where there are no intersections, achieving the volume to capacity ratios in Tables 6 and 7 for either direction of travel on the highway demonstrates that state mobility ~~targets~~ standards are being met.
- For unsignalized intersections, achieving the volume to capacity ratios in Tables 6 and 7 for the state highway approaches indicates that state mobility ~~targets~~ standards are being met. In order to maintain safe operation of the intersection, non-state highway approaches are expected to meet or not to exceed the volume to capacity ratios for District/Local Interest Roads in Table 6, except within the Portland metropolitan area UGB where non-state highway approaches are expected to meet or not to exceed a v/c of 0.99.
- At signalized intersections other than interchange ramp terminals (see below), the overall intersection v/c ratio is expected to meet or not to exceed the volume to capacity ratios in Tables 6 and 7. Where Tables 6 and 7 v/c ratios differ by legs of the intersection, the more restrictive of the volume to capacity ratios in the tables shall apply. Where a state highway intersects with a local road or street, the volume to capacity

ratio for the state highway shall apply.

- Although an interchange serves both the mainline and the crossroad to which it connects, it is important that the interchange be managed to maintain safe and efficient operation of the mainline through the interchange area. The main objective is to avoid the formation of traffic queues on off-ramps which back up into the portions of the ramps needed for safe deceleration from mainline speeds or onto the mainline itself. This is a significant traffic safety concern. The primary cause of traffic queuing at off-ramps is inadequate capacity at the intersections of the ramps with the crossroad. These intersections are referred to as ramp terminals. In many instances where ramp terminals connect with another state highway, the mobility [target standard](#) for the connecting highway will generally signify that traffic backups onto the mainline can be avoided. However, in some instances where the crossroad is another state highway or a local road, the mobility [target standard](#) will not be a good indicator of possible future queuing problems. Therefore, the better indication is a maximum volume to capacity ratio for the ramp terminals of interchange ramps that is the more restrictive volume to capacity ratio for the crossroad, or 0.85.
- At an interchange within an urban area the mobility target used may be increased to as much as 0.90 v/c, but no higher than the [target standard](#) for the crossroad, if:
 1. It can be determined, with a probability equal to or greater than 95 percent, that vehicle queues would not extend onto the mainline or into the portion of the ramp needed to accommodate deceleration from mainline speed; and
 2. An adopted Interchange Area Management Plan (IAMP) is present, or through an IAMP adoption process, which must be approved by the OTC.
- Because the ramps serve as an area where vehicles accelerate or decelerate to or from mainline speeds, the mobility [target standard](#) for the interchange ramps exclusive of the crossroad terminals is the same as that for the mainline. Metered on-ramps, where entering traffic is managed to maintain efficient operation of the mainline through the

interchange area, may allow for greater volume to capacity ratios.

Action 1F.4

Alternative mobility ~~targets~~standards may also be developed for facilities where an investment has been or is planned to be made which provides significantly more capacity than is needed to serve the forecasted traffic demand based on the existing adopted local comprehensive plan and it is possible to preserve that excess capacity for traffic growth beyond the established planning horizon or traffic growth resulting from local legislative plan amendments or plan amendments associated with OAR 731-017.

Action 1F.5

For purposes of evaluating amendments to transportation system plans, acknowledged comprehensive plans and land use regulations subject to OAR 660-12-0060, in situations where the volume to capacity ratio or alternative mobility ~~target~~standard for a highway segment, intersection or interchange is above the mobility ~~targets~~standards in Table 6 or Table 7, or those otherwise approved by the Commission, and transportation improvements are not planned within the planning horizon to bring performance to the established target, the mobility ~~target~~standard is to ~~avoid~~prevent further degradation. If an amendment to a transportation system plan, acknowledged comprehensive plan or land use regulation increases the volume to capacity ratio further, or degrades the performance of an adopted mobility target, it will significantly affect the facility unless addressed through ~~the language below regarding determination of a small increase in traffic. In addition to the capacity~~ increasing improvements that may be required as a condition of approval ~~or~~; other performance improving actions to consider include, but are not limited to:

- System connectivity improvements for vehicles, bicycles and pedestrians.
- Transportation demand management (TDM) methods to reduce the need for additional capacity.

- Multi-modal (bicycle, pedestrian, transit) opportunities to reduce vehicle demand.
- Operational improvements to maximize use of the existing system.
- Land use techniques such as trip caps / budgets to manage trip generation.

~~In applying “avoid further degradation” for state highway facilities already operating above the mobility targets in Table 6 or Table 7 or those otherwise approved by the Commission, a small increase in traffic does not cause “further degradation” of the facility.~~

~~The threshold for a small increase in traffic between the existing plan and the proposed amendment is defined in terms of the increase in average daily trip volumes as follows:~~

- ~~• Any proposed amendment that does not increase the average daily trips by more than 400.~~
- ~~• Any proposed amendment that increases the average daily trips by more than 400 but less than 1001 for state facilities where:~~
 - ~~◦ The annual average daily traffic is less than 5,000 for a two-lane highway~~
 - ~~◦ The annual average daily traffic is less than 15,000 for a three-lane highway~~
 - ~~◦ The annual average daily traffic is less than 10,000 for a four-lane highway~~
 - ~~◦ The annual average daily traffic is less than 25,000 for a five-lane highway~~
- ~~• If the increase in traffic between the existing plan and the proposed amendment is more than 1000 average daily trips, then it is not considered a small increase in traffic and the amendment causes further degradation of the facility and would follow existing processes for resolution.~~

In applying OHP mobility ~~targets~~standards to analyze mitigation, ODOT recognizes that there are many variables and levels of uncertainty in calculating volume-to-capacity ratios, particularly over the planning horizon.

After negotiating reasonable levels of mitigation for actions required under OAR 660-012-0060, ODOT considers calculated values for v/c ratios that are within 0.03 of the adopted target in the OHP to be considered in compliance with the target. It is not the intent of the agency to consider variation within modest levels of uncertainty in violation of mobility ~~targets~~standards for reasonable mitigation. The specific mobility target still applies for determining significant affect under OAR 660-012-0060.

ROCK Michael D

From: Chris Maciejewski [csm@dksassociates.com]
Sent: Monday, November 21, 2011 4:49 PM
To: CRALL Matthew
Cc: Michael Rock; John Bosket
Subject: Written Comments on Draft OHP Amendments
 Matt / Michael -

John Bosket and I spent some time looking over the OHP Amendments dated 9/21/11. First of all, we want to thank you for the ODOT/DLCD willingness to revisit these documents based on the demand from many stakeholders. We are trying to keep our comments brief, so please feel free to follow-up with either of us if you want to discuss anything further.

#1 - Action 1F.1 - we have comments about the portions of this action that are specific to interchange area. It seems clear to us that the priority of the interchange area is safety related to queuing of a ramp back onto a mainline. Given that priority, it would seem better to align policy with intent and simply require the queuing analysis in these areas whenever an analysis is conducted. A v/c standard that isn't consistent with (i.e., lower than) the standard of the facilities that are connected by the interchange does not by itself eliminate queuing concerns. For example, at a signalized ramp terminal, you could have a v/c ratio exceeding the standard on the cross street movements and a v/c ratio meeting the standard on the off-ramp movements, with a overall intersection v/c ratio exceed the standard. However, the off-ramp movements could be operating adequately (i.e., no queuing concerns), so you could essentially be falsely-diagnosing of a "safety" issue by just applying a lower v/c threshold. Therefore, we would propose using the appropriate values in Tables 6 & 7 for the facility type, and adding the requirement about queuing as an additional performance standard at those locations.

#2 - Action 1F.5 - we are a little curious about the threshold for small increases in traffic not causing a significant impact. Our experience with ODOT region staff has been to apply the guidelines for impact studies for this threshold for prior work (50 trips in a peak hour, or 300 daily trips). This new language loosens the value for daily trips, but does not include a peak hour requirement. As analysis is almost always peak-hour scenarios, it seems that including a peak hour value would make sense. Maybe 65 or 70 vehicles in a peak hour (consistent with the 33% increase on the daily value)?

#3 - Action 1F.5 - under the mitigation portion of the policy, I can certainly see where having a 0.03 v/c ratio flexibility would help in locations where reasonable mitigations are hard to find. The difficulty in this section of the policy will be determining "reasonable" mitigation. Who defines reasonable? Is that part of the "negotiation"? This seems like a policy that has the potential to be interpreted and applied very differently region to region, staff to staff. I'm not sure of a good fix for this off the top of my head, but it seems like a policy with good intent that could create a lot of frustration from inconsistent/unclear application.

Thanks,

Chris

11/21/2011

--

Christopher S. Maciejewski, P.E., P.T.O.E.

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November 21st, 2011

ODOT – Transportation Development Division
Attn: Michael Rock
555 13th Street NE, Suite 2
Salem, OR 97301-4178



To Whom It May Concern:

The Bicycle Transportation Alliance is pleased to submit comments on behalf of our 3,000 members on the proposed Oregon Highway Plan Mobility Standard Revisions. In general, we support the direction that the Mobility Standard Revisions are taking as it relates to building healthier streets and communities. The proposed policy change encourages a multimodal network of local streets, collectors, and arterials by better balancing policy objectives to consider all roadway users.

We ask ODOT to develop mobility targets for bicycle and pedestrian volumes that are integrated into the mobility standard policy.

1. Governor's Directives

On August 24th, 2011 Governor Kitzhaber provided direction to the Oregon Transportation Commission on how policy, planning and project decisions will be made from that time forth. Below is an analysis of how the Mobility Standard Revisions align with those directives.

Are we creating programs that don't simply invest in the future of the transportation system but meet a multitude of community objectives?

The policy proposal brings the transportation network closer to the needs of local communities by recognizing a lack of ODOT policies that support healthy, active, and economically viable communities. The proposal needs to continue to advance the state of the practice by giving specific mobility targets for non-motorized modes of transportation to guide officials. The current policy opens the door but does little to guide those who may not have experience creating accessible multimodal networks (i.e. in smaller or rural towns).

Does each decision move us closer to a sustainable, safe, lower carbon, multimodal system?

The policy proposal promotes a multimodal system and even emphasizes projects that help lower air quality risks for all users. The policy has the potential to be far-reaching by encouraging efficient distribution of new projects based not only on needs of vehicles, but also of bicyclists, pedestrians, and transit users. It could go farther by being more specific with its suggestions, particularly by giving examples of mobility targets for non-motorized vehicles. With the exception of Action 1F.4, which helps perpetuate excess roadway capacity for motor vehicles, Policy 1F is strongly in support of creating a sustainable, more flexible system.

Removing Action 1F.4, or amending it in a way that promotes using excess capacity for non-motorized modes, would create a more sustainable policy revision.

Does the decision maximize benefit for the least-cost under the limited resources?

Understanding and promoting the need for bicycle and pedestrian performance measures moves the transportation network towards a more balanced system. Active transportation users (i.e. bicyclists, pedestrians, and – to a degree – public transportation users) require less funding and achieve more mobility across a given space than motor vehicle users, helping to save money and promote more active communities with far-reaching benefits.

Does this decision or policy move us closer to finding a more rational transportation funding mechanism for the future?

The policy proposal does not directly address funding, though mobility measures are often the primary method for prioritizing facility needs. As such, Policy 1F can help indirectly lead to more efficient project distribution and funding.

2. Mobility Targets for Bicycle and Pedestrians on State Roadways

We want ODOT to continue work to create a transportation system that not only accommodates non-motorized transportation but actively promote walking and bicycling as viable forms of transportation within the urban growth boundary and in unincorporated urban communities.

We ask ODOT to develop mobility targets for bicycle and pedestrian volumes that are integrated into the mobility standard policy.

Bicycle and pedestrian interests must be addressed by developing “alternative mobility targets” that take into account all modes of transportation. In developing and applying alternative mobility targets and methodologies for facilities throughout the state, ODOT must consider tools and methods that have been successfully used for a particular facility and/or within a specific metropolitan area or region.

Despite recognizing the importance of non-motorized modes of transportation, the draft policy does not prescribe explicit mobility targets for other modes of travel. Mobility targets commonly applied to motor vehicle travel, such as volume-to-capacity (v/c) ratios and level-of-service (LOS) measures, are difficult to apply to alternative modes such as bicycling due to an inherently different type of capacity constraint that occurs with high demand or poor maintenance.

Unlike most motorists, bicyclist skill level weighs heavily into the decision to travel on certain streets. While motor vehicle roadway performance is increasingly measured in a v/c-ratio, bicycle performance measures are still primarily reported in level-of-service terms. Thus, bicycle LOS determines not only capacity, but also comfort level and general appropriateness of the streetscape for a bicyclist. Past studies have yielded a wide range of bicycle-specific LOS measurements used to determine appropriateness of streets for bicyclists to travel. The FHWA, in a [report](#) on bicycle and pedestrian capacity analysis, notes that on-street bicycle facility LOS is affected by a multitude of factors including adjacent motor vehicle traffic (which is often moving much faster than the bicycles), truck traffic, commercial and residential driveways, and adjacent on-street parking.

One possible method to use when incorporating these factors into a bicycle LOS rating is an audit of the facility and its surrounding environment. Linda Dixon ([1996](#)) created a detailed point system to quantitatively measure a variety of categories including type of bicycle facility provided, recorded conflicts, speed differentials between typical bicyclist speed and vehicles, motor vehicle LOS, and maintenance. Objectively analyzing facilities with a point system gives an LOS that goes beyond the typical capacity analysis as is typical with motor vehicle LOS.

3. Additional Concerns

Action 1F.5 adds a broad range of items to be considered as an addition to project approval criteria, including system connectivity for vehicles, bicycles, and pedestrians; multimodal opportunities to reduce vehicle congestion; and operational improvements to maximize use of the existing system. The policy introduces an air quality attainment/maintenance plan that relies heavily on reducing auto trips through land use changes and increases in transit service. Air quality issues are highly relevant to active transportation (i.e. walking and bicycling) users near busy roadways, and any reductions in air pollutants help create healthier environments for all users.

While the proposed policy is an important step towards a successful multimodal network, one section threatens to perpetuate motor vehicle-oriented planning. Action 1F.4 addresses facilities that are “significantly” over capacity or will become so after a planned investment. In these cases, the policy calls for alternative mobility targets as a way to preserve the excess capacity for future growth beyond the established planning horizon, which may have otherwise been eliminated using the standard mobility targets. No consideration is made for alternative uses of the excess capacity, namely bike lanes, cycle tracks, or road diets. This policy item seems counterintuitive to the rest of the proposal and in many ways seems a vestige of motor vehicle-centric schools of thought. Action 1F.4 needs to be revised to promote utilizing excess capacity in innovative ways such as providing bicycle facilities. Such a revision helps promote a multimodal system rather than preserving and essentially perpetuating excessive motor vehicle capacity.

We look forward to continue our work with ODOT to build healthier streets and communities across Oregon.

Sincerely,

Susan Peithman
Statewide Advocate



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November 21, 2011

VIA EMAIL

Mr. Patrick Egan, Chairman
Oregon Transportation Commission
1158 Chemeketa Street NE
Salem, OR 97301

Re: Draft Oregon Highway Plan (OHP) Policy 1F Revisions

Dear Mr. Egan:

This letter is written on behalf of the Retail Task Force (RTF) and the Oregon Government Relations Committee for the International Council of Shopping Centers (ICSC) regarding the above. Please make this letter a part of your record of proceedings.

Consistent with my testimony to the Commission in Silverton on November 16, 2011, the RTF and ICSC have the following comments:

- We support the leadership of ODOT's Director, Matthew Garrett, as expressed in his May 25, 2011 memorandum to the Joint Subcommittee, to further integrate land use and transportation planning through refinements to the provisions of the Oregon Highway Plan (OHP) and the Transportation Planning Rule (TPR).
- We generally support the position taken by the League of Oregon Cities, as expressed in its letter of November 15, 2011.
- We strongly support the insertion of the new policy language in Action 1F.7 stating: "Balance economic objectives of properties abutting state highways with transportation safety and access management objectives of state highways in a manner consistent with local transportation system plans and the land uses permitted in acknowledged local comprehensive plans." That language is consistent with the recently amended provisions of ORS 374.312(1).

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Perkins Coie LLP and Affiliates

Mr. Patrick Egan, Chairman
Oregon Transportation Commission
November 21, 2011
Page 2

We support the amendments as drafted, except for our request to make the following minor changes that were included in my testimony last week to add consistency to other amendments now proposed in the TPR at OAR 734-051-0060(3), as follows:

- At page 11, line 44, add the phrase "or is projected to be" before the phrase "above the mobility targets" and further, add the phrase "within the planning horizon" after the phrase "in Table 6 or Table 7".
- At page 17, lines 20-21, add the phrase "or projected" before the phrase "above the mobility targets" and, further, add the phrase "within the planning horizon" following the phrase "in Table 6 or Table 7".

Thank you for the opportunity to comment on these important amendments.

Very truly yours,



Mark D. Whitlow

MDW:crl

Cc: Matthew L. Garrett, Director, ODOT (via email)
Retail Task Force (via email)
International Council of Shopping Centers (via email)

OHP Policy 1F Proposed Revisions

Final Oregon Transportation Commission Review DRAFT

1999 OREGON HIGHWAY PLAN

HIGHWAY MOBILITY POLICY

Background

The Highway Mobility Policy establishes state highway mobility targets that implement the objectives of the Oregon Transportation Plan (OTP) and other OHP policies. The policy does not rely on a single approach to determine transportation needs necessary to maintain acceptable and reliable levels of mobility on the state highway system. It offers the flexibility to consider and develop methodologies to measure mobility that are reflective of current and anticipated land use, transportation and economic conditions of the state and in a community.

While ODOT measures vehicular highway mobility performance through volume to capacity (v/c) ratios (see Tables 6 and 7) when making initial determinations of facility needs necessary to maintain acceptable and reliable levels of mobility on the state highway system, achieving v/c targets will not necessarily be the determinant of the transportation solution(s). Policy 1F recognizes and emphasizes opportunities for developing alternative mobility targets (including measures that are not v/c-based) that provide a more effective tool to identify transportation needs and solutions and better balance state and local community needs and objectives. Through this policy, the state acknowledges that achieving important community goals may impact mobility performance and that higher levels of congestion may result in certain areas.

Several policies in the ~~Highway Plan~~OHP establish general mobility objectives and approaches for maintaining mobility.

- Policy 1A (State Highway Classification System) describes in general the functions and objectives for several categories of state highways. Greater mobility is expected on Interstate and Statewide Highways than on Regional and District Highways.
- Policy 1B (Land Use and Transportation) has an objective of coordinating land use and transportation decisions to maintain the mobility of the highway system. The policy identifies several land use types and describes in general the levels of mobility objectives appropriate for each.
- Policy 1C (State Highway Freight System) has an objective of maintaining efficient through movement on major truck Freight Routes. The policy identifies the highways that are Freight Routes.

- Policy 1G (Major Improvements) has the purpose of maintaining highway performance and improving highway safety by improving system efficiency and management before adding capacity.

Although each of these policies addresses mobility, none provide measures by which to describe and understand levels of mobility and evaluate what levels are acceptable for the various classifications of state highway facilities.

The Highway Mobility Policy identifies how the ~~State-state~~ measures mobility and establishes targets that are reasonable and consistent with the direction of the OTP and ~~Highway Plan~~OHP policies. This policy carries out Policies 1A and 1C by establishing mobility targets for Interstate Highways, Freight Routes and other Statewide Highways that reflect the expectation that these facilities maintain a level of mobility to safely and efficiently support statewide economic development while balancing available financial resources. It carries out Policy 1B by acknowledging that lower vehicular mobility in Special Transportation Areas (STAs) and highly developed urban areas is the expectation and assigns a mobility target that accepts a higher level of congestion in these situations. The targets set for Regional and District Highways in STAs and highly urbanized areas allow for lower vehicular mobility to better balance other objectives, including achieving a multimodal system. In these areas, traffic congestion will regularly reach levels where peak hour traffic flow is highly unstable and greater traffic congestion will occur. In order to better support state and local economic activity, targets for Freight Routes are set to provide for less congestion than would be acceptable for other state highways. Interstate Highways and Expressways are incompatible with slower traffic and higher level of vehicular congestion and therefore, STA designations will not be applied to these highway classifications. For Interstate and Expressway facilities it will be important to manage congestion to support regional and state economic development goals.

The mobility targets are contained in Tables 6 and 7 and in Action 1F.1. Tables 6 and 7 refer only to vehicle mobility on the state highway system. At the same time, it is recognized that other transportation modes and regional and local planning objectives need to be considered and balanced when evaluating performance, operation and improvements to the state highway system. Implementation of the Highway Mobility Policy will require state, regional and local agencies to assess mobility targets and balance actions within the context of multiple technical and policy objectives. While the mobility targets are important tools for assessing the transportation condition of the system, mobility is only one of a number of objectives that will be considered when planning ~~developing~~ transportation solutions.

The highway mobility targets are used in three distinct ways:

- Transportation System Planning: Mobility targets identify state highway mobility performance expectations and provide a measure by which the existing and future performance of the highway system can be evaluated. Plan development may necessitate adopting methodologies and targets that deviate from adopted mobility targets in order to balance regional and local performance expectations. For

1 | purposes of compliance with OAR 660-012, the Transportation Planning Rule,
2 | mobility targets are considered performance standards.
3 |

- 4 | • Plan Amendments and Development Review: Mobility targets are used to review
5 | amendments to comprehensive plans and land use regulations pursuant to the
6 | Transportation Planning Rule (TPR) to assess if the proposed changes are
7 | consistent with the planned function, capacity and performance standards of state
8 | highway facilities.- Unless the Oregon Transportation Commission has adopted an
9 | alternative mobility target for the impacted facility, the mobility targets in Tables
10 | 6 and 7 are considered standards for purposes of determining compliance with
11 | OAR 660-012-0060.
12 |
- 13 | • Operations: Mobility targets assist in making traffic operations decisions such as
14 | managing access and traffic control systems to maintain acceptable highway
15 | performance.
16 |

17 | The Highway Mobility Policy applies primarily to transportation and land use planning
18 | decisions. By defining targeted levels of highway system mobility, the policy provides
19 | direction for identifying (vehicular) highway system deficiencies. The policy does not,
20 | however, determine what actions should be taken to address the deficiencies.
21 |

22 | Mobility in the policy is measured using a volume to capacity ratio or v/c. This policy
23 | also provides opportunities to seek Oregon Transportation Commission approval for
24 | alternative mobility targets that are not v/c-based.
25 |

26 | It is also important to note that regardless of the performance measure, v/c or other, the
27 | Highway Mobility Policy recognizes the importance of considering the performance of
28 | other modes of travel. While the policy does not prescribe mobility targets for other
29 | modes of travel, it does allow and encourage ODOT and local jurisdictions to consider
30 | mobility broadly – through multimodal measures or within the context of regional or
31 | local land use objectives. Providing for better multimodal operations is a legitimate
32 | justification for developing alternatives to established OHP mobility targets.
33 |

34 | The Highway Mobility Policy will affect land use decisions through the requirements of
35 | the TPR. The TPR requires that regional and local transportation system plans ~~(TSP)~~ be
36 | consistent with plans adopted by the Oregon Transportation Commission~~OTC~~. The TPR
37 | also requires that local governments ensure that comprehensive plan amendments, zone
38 | changes and amendments to land use regulations that significantly affect a transportation
39 | facility are consistent with the identified function, capacity and performance of the
40 | affected state facility. The Highway Mobility Policy establishes ODOT's mobility targets
41 | for state highways as the standards for ~~determining compliance~~ system performance with
42 | in compliance with the TPR (OAR 660-012-0060) and are to be used to determine
43 | significant affect specifically related to Section -0060 of the TPR.
44 |

45 | Policy 1F does not apply to highway design. Separate design mobility standards are
46 | contained in ODOT's Highway Design Manual (HDM). While HDM design standards

1 and OHP mobility targets in Policy 1F may not be the same, ODOT's intention is to
2 continue to balance statewide mobility and economic development objectives with
3 community mobility, livability and economic development objectives through enhanced
4 coordination between planning and design. Where the Oregon Transportation
5 Commission adopts alternative mobility targets in accordance with this policy, they are
6 establishing an agreement with the local jurisdiction to manage and develop the state
7 system to the expected and planned levels of performance, consistent with the
8 jurisdiction's underlying planning objectives (as set out in local comprehensive plan
9 policy and land use regulations). However, coordination on exceptions to design mobility
10 standards may still be required.

11
12 ODOT's intention is that the mobility targets be used to identify system mobility
13 deficiencies over the course of a reasonable planning horizon. The planning horizon shall
14 be:

- 15
16 • At least 20 years for the development of state, regional and local transportation
17 plans, including ODOT's corridor plans; and
- 18
19 • The greater of 15 years or the planning horizon of the applicable local and
20 regional transportation system plans for amendments to transportation plans,
21 comprehensive plans or land use regulations.

22
23 ODOT measures vehicular highway mobility performance through v/c ratios. The v/c
24 ratio was selected after an extensive analysis of highway performance measures prior to
25 adoption of the 1999 Oregon Highway Plan. The review included the effectiveness of the
26 measure to achieving other ~~highway plan~~ policies (particularly OHP Policy 1B, Land
27 Use and Transportation), implications for growth patterns, how specifically ODOT
28 ~~should ODOT~~ integrate transportation policy ~~integrate~~ with land use, flexibility for
29 modifying targets, and the effects of Portland metro area targets on the major state
30 highways in the region. ODOT uses v/cV/C-based measures ~~were chosen~~ for reasons of
31 application consistency and flexibility, manageable data requirements, forecasting
32 accuracy, and the ability to aggregate into area-wide targets that are fairly easy to
33 understand and specify. In addition, since v/c is responsive to changes in demand as well
34 as in capacity, it reflects the results of demand management, land use and multimodal
35 policies. However, it is recognized that there are limitations in applying v/c, especially in
36 highly congested conditions and in a multimodal environment. OHP policies allow
37 options for other measures, or combinations of measures, to be considered.

38
39 Mobility targets are a measure by which the state assesses the functionality of a facility
40 and are used, along with consideration of other policy objectives, to plan for system
41 improvements. These mobility targets are shown in Table 6 and vary, depending on the
42 category of highway, the location of the facility – within a STA, MPO, UGB,
43 unincorporated community or rural lands – and the posted speed of the facility. Table 6
44 also reflects Policy 1B (Land Use and Transportation) and the State's-state's commitment
45 to support increased density and development activities in urban areas. Through higher
46 v/c ratios and allowing consideration ~~the adoption~~ of alternative mobility targets, the

1 | ~~State~~ state acknowledges that it is appropriate and anticipated that certain areas will have
2 more traffic congestion because of the land use pattern that a region or local jurisdiction
3 has committed to through adopted local policy.

4
5 Separate mobility targets for the Portland metropolitan area have been included in the
6 policy (Table 7). These targets have been adopted with an understanding of the unique
7 context and policy choices that have been made by local governments in that area
8 including:

- 9
10 • A regional plan that links land use and transportation decisions and investments to
11 support land uses in urban centers and corridors and supports multi-modal
12 transportation options;
- 13
14 • Implementation of Transportation System Management and Operations (TSMO)
15 strategies, including freeway ramp meters, real time traffic monitoring and
16 incident response to maintain adequate traffic flow; and
- 17
18 • An air quality attainment/maintenance plan that relies heavily on reducing auto
19 trips through land use changes and increases in transit service.

20
21 The Portland Metro targets have been adopted specifically for the Portland metropolitan
22 area with a mutual understanding that these mobility targets better reflect the congestion
23 that already exists within the constraints of the metro area's transportation system and
24 which will not be alleviated by state highway improvements. The targets contained in
25 Table 7 are meant for interim use only. The Oregon Transportation Commission expects
26 the Portland Metro area to work with ODOT and stakeholders to explore a variety of
27 measures to assess mobility and to develop alternative targets that best reflect the
28 multiple transportation, land use and economic objectives of the region.

29
30 The mobility targets included in the Highway Mobility Policy must be used for the initial
31 deficiency analysis of state highways. However, where it can be shown that it is
32 infeasible or impractical to meet the targets, local governments may work with ODOT
33 and stakeholders to consider and evaluate alternatives to the mobility targets in Tables 6
34 and 7. Any variance from the targets in Tables 6 and 7 will require Oregon
35 Transportation Commission adoption. Increasingly, urban and urbanizing areas are facing
36 traffic and land use pressures due to population growth, aging infrastructure, and reduced
37 revenues for roadway and related infrastructure projects. In response to state funding
38 constraints and the need to balance multiple objectives, system management solutions
39 and enhancement of alternative modes of travel, rather than major highway
40 improvements, are increasingly relied upon to address congestion issues. Developing
41 mobility targets that are tailored to specific facility needs, consistent with local
42 expectations, values and land use context will need to be part of the solution for some
43 highway locations. Furthermore, certain urban areas may need area-specific targets to
44 better balance state and local policies pertaining to land use and economic development.
45 Examples where conditions may not match state mobility targets include metropolitan

1 areas, STAs, areas with high seasonal traffic, and areas constrained by the existing built
2 or natural environment.

3
4 Alternatives to the mobility targets and methodologies in the tables must be adopted
5 through an amendment to the OHP. The Oregon Transportation Commission must adopt
6 the new targets supported by findings that explain and justify the supporting
7 methodology.

8
9 Policy 1F is not the only transportation policy that influences how the state assesses the
10 adequacy of a highway facility and vehicle mobility is not the only objective. Facilitating
11 state, regional and local economic development, enhancing livability for Oregon's
12 communities, and encouraging multiple modes are also important policy areas that guide
13 state transportation investment and planning. Policy 1B recognizes that the state will
14 coordinate land use and transportation decisions to efficiently use public infrastructure
15 investments to enhance economic competitiveness, livability and other objectives.
16 Economic viability considerations help define when to make major transportation
17 investments (Policy 1G). Goal 4, Travel Alternatives, articulates the state's goal to
18 maintain a well-coordinated and integrated multimodal system that accommodates
19 efficient inter-modal connections for people and freight and promotes appropriate multi-
20 modal choices. Making decisions about the appropriate level of mobility for any given
21 part of the statewide highway system must be balanced by these, and other relevant OTP
22 and OHP policies.

23 24 25 **Policy 1F: Highway Mobility Policy**

26
27 *It is the policy of the State of Oregon to maintain acceptable and reliable levels of*
28 *mobility on the state highway system, consistent with the expectations for each facility*
29 *type, location and functional objectives. Highway mobility targets will be the initial tool*
30 *to identify deficiencies and consider solutions for vehicular mobility on the state system.*
31 *Specifically, mobility targets shall be used for:*

- 32
33 • *Identifying state highway mobility performance expectations for planning and*
34 *plan implementation;*
- 35
36 • *Evaluating the impacts on state highways of amendments to transportation plans,*
37 *acknowledged comprehensive plans and land use regulations pursuant to the*
38 *Transportation Planning Rule (OAR 660-12-0060); and*
- 39
40 • *Guiding operational decisions such as managing access and traffic control*
41 *systems to maintain acceptable highway performance.*

42
43 *Mobility targets for state highways, as established in this policy or as otherwise adopted*
44 *by the Oregon Transportation Commission as alternative mobility targets, are considered*
45 *the highway system performance standards in compliance with the TPR (OAR 660-012),*
46 *including applicability for actions that fall under Section -0060 of the TPR.*

Where it is infeasible or impractical to meet the mobility targets, acceptable and reliable levels of mobility for a specific facility, corridor or area will be determined through an efficient, collaborative planning process between ODOT and the local jurisdiction(s) with land use authority. The resulting mobility targets will reflect the balance between relevant objectives related to land use, economic development, social equity, and mobility and safety for all modes of transportation. Alternative mobility targets for the specific facility shall be adopted by the Oregon Transportation Commission as part of the OHP.

Oregon Transportation Commission adoption of alternative mobility targets through system and facility plans should be accompanied by acknowledgement in local policy that state highway improvements to further reduce congestion and improve traffic mobility ~~issues~~ conditions in the subject area are not expected.

Traffic mobility exemptions in compliance with the TPR do not obligate state highway improvements that further reduce congestion and improve traffic mobility ~~issues~~ conditions in the subject area.

Action 1F.1

Mobility targets are the measure by which the state assesses the existing or forecasted operational conditions of a facility and, as such, are a key component ODOT uses to determine the need for or feasibility of providing highway or other transportation system improvements. These mobility targets are shown in Table 6 and Table 7. For purposes of assessing state highway performance:

- Use the mobility targets below and in Table 6 when initially assessing all state highway sections located outside of the Portland metropolitan area urban growth boundary.
- Use the mobility targets below and in Table 7 when initially assessing all state highway sections located within the Portland metropolitan area urban growth boundary.
- For highways segments where there are no intersections, achieving the volume to capacity ratios in Tables 6 and 7 for either direction of travel on the highway demonstrates that state mobility targets are being met.
- For unsignalized intersections, achieving the volume to capacity ratios in Tables 6 and 7 for the state highway approaches indicates that state mobility targets are being met. In order to maintain safe operation of the intersection, non-state highway approaches are expected to meet or not to exceed the volume to capacity ratios for District/Local Interest Roads in Table 6, except within the Portland metropolitan area UGB where non-state highway approaches are expected to meet or not to exceed a v/c of 0.99.

- 1 • At signalized intersections other than interchange ramp terminals (see below), the
2 overall intersection v/c ratio is expected to meet or not to exceed the volume to
3 capacity ratios in Tables 6 and 7. Where Tables 6 and 7 v/c ratios differ by legs of
4 the intersection, the more restrictive of the volume to capacity ratios in the tables
5 shall apply. Where a state highway intersects with a local road or street, the
6 volume to capacity ratio for the state highway shall apply.
7
- 8 • Although an interchange serves both the mainline and the crossroad to which it
9 connects, it is important that the interchange be managed to maintain safe and
10 efficient operation of the mainline through the interchange area. The main
11 objective is to avoid the formation of traffic queues on off-ramps which back up
12 into the portions of the ramps needed for safe deceleration from mainline speeds
13 or onto the mainline itself. This is a significant traffic safety concern. The primary
14 cause of traffic queuing at off-ramps is inadequate capacity at the intersections of
15 the ramps with the crossroad. These intersections are referred to as ramp
16 terminals. In many instances where ramp terminals connect with another state
17 highway, the mobility target for the connecting highway will generally signify
18 that traffic backups onto the mainline can be avoided. However, in some instances
19 where the crossroad is another state highway or a local road, the mobility target
20 will not be a good indicator of possible future queuing problems. Therefore, the
21 better indication is a maximum volume to capacity ratio for the ramp terminals of
22 interchange ramps that is the more restrictive volume to capacity ratio for the
23 crossroad, or 0.85.
24
- 25 • At an interchange within an urban area the mobility target used may be increased
26 to as much as 0.90 v/c, but no higher than the target for the crossroad, if:
27
 - 28 1. It can be determined, with a probability equal to or greater than 95
29 percent, that vehicle queues would not extend onto the mainline or into the
30 portion of the ramp needed to safely accommodate deceleration ~~from~~
31 mainline speed; and
32
 - 33 2. An adopted Interchange Area Management Plan (IAMP) is present, or
34 through an IAMP adoption process, which must be approved by the
35 Oregon Transportation Commission.
36
- 37 • Because the ramps serve as an area where vehicles accelerate or decelerate to or
38 from mainline speeds, the mobility target for the interchange ramps exclusive of
39 the crossroad terminals is the same as that for the mainline. Metered on-ramps,
40 where entering traffic is managed to maintain efficient operation of the mainline
41 through the interchange area, may allow for greater volume to capacity ratios.
42

1 **Action 1F.2**

- 2
- 3 • Apply mobility targets over at least a 20-year planning horizon when developing
4 state, regional or local transportation system plans, including ODOT's corridor
5 plans.
6
 - 7 • When evaluating highway mobility for amendments to transportation system
8 plans, acknowledged comprehensive plans and land use regulations, use the
9 planning horizons in adopted local and regional transportation system plans or a
10 planning horizon of 15 years from the proposed date of amendment adoption,
11 whichever is greater. To determine the effect that an amendment to an
12 acknowledged comprehensive plan or land use regulation has on a state facility,
13 the capacity analysis shall include the forecasted growth of traffic on the state
14 highway due to regional and intercity travel and consistent with levels of planned
15 development according to the applicable acknowledged comprehensive plan over
16 the planning period. Planned development, for the purposes of this policy, means
17 the amount of population and employment growth and associated travel
18 anticipated by the community's acknowledged comprehensive plan over the
19 planning period. The Oregon Transportation Commission encourages
20 communities to consider and adopt land use plan amendments that would
21 reallocate expected population and employment growth to designated community
22 centers as a means to help create conditions that increase the use of transit and
23 bicycles, encourage pedestrian activity, reduce reliance on single occupant vehicle
24 travel and minimize local traffic on state highways.
25

26 **Action 1F.3**

27

28 In the development of transportation system plans or ODOT facility plans, where it is
29 infeasible or impractical to meet the mobility targets in Table 6 or Table 7, or those
30 otherwise approved by the Oregon Transportation Commission, ODOT and local
31 jurisdictions may explore different target levels, methodologies and measures for
32 assessing mobility and consider adopting alternative mobility targets for the facility.
33 While v/c remains the initial methodology to measure system performance, measures
34 other than those based on v/c may be developed through a multi-modal transportation
35 system planning process that seeks to balance overall transportation system efficiency
36 with multiple objectives of the area being addressed.
37

38 Examples of where state mobility targets may not match local expectations for a specific
39 facility or may not reflect the surrounding land use, environmental or financial conditions
40 include:

- 41
- 42 • Metropolitan areas or portions thereof where mobility expectations cannot be
43 achieved and where they are in conflict with an adopted integrated land use and
44 transportation plan for promoting compact development, reducing the use of
45 automobiles and increasing the use of other modes of transportation, promoting

efficient use of transportation infrastructure, improving air quality, and supporting greenhouse gas reduction objectives;

- When financial considerations or limitations preclude the opportunity to provide a planned system improvement within the planning horizon;
- When other locally adopted policies must be balanced with vehicular mobility and it can be shown that these policies are consistent with the broader goals and objectives of OTP and OHP policy;
- Facilities with high seasonal traffic;
- Special Transportation Areas; and
- Areas where severe environmental or land use constraints^{13,14} make infeasible or impractical the transportation improvements necessary to accommodate planned land uses or to accommodate comprehensive plan changes that carry out the Land Use and Transportation Policy (1B).

Any proposed mobility target that deviates from the mobility targets in Table 6 or Table 7, or those otherwise approved by the Commission, shall be clear and objective and shall provide standardized procedures to ensure consistent application of the selected measure. The alternative mobility target(s) shall be adopted by the Oregon Transportation Commission as an amendment to the OHP. Consideration of alternative mobility targets shall be coordinated with other local jurisdictions in the affected corridor, consistent with OTC Policy 11- Public Involvement.

The ~~OTC~~ Transportation Commission has sole authority to adopt mobility targets for state highways. It will be necessary for affected local jurisdictions to agree to ~~and acknowledge~~ the alternative mobility target for the state highway facility as part of a local transportation system plan and regional plan (MPO) as applicable. Findings shall demonstrate why the particular mobility target is necessary, including the finding that it is infeasible or impractical to meet the mobility targets in Table 6 or Table 7, or those otherwise approved by the Commission.

If alternative targets are needed but cannot be established through the system planning process prior to adoption of a new or updated TSP transportation system plan, they should be identified as necessary and committed to as a future refinement plan work item with an associated timeframe for completion and adoption. In this case, the mobility targets in Table 6 or Table 7, or those otherwise approved by the Commission, shall continue to apply until the alternative mobility targets are formally adopted by the Oregon Transportation Commission ~~OTC~~.

^{13,14}Examples of severe environmental and land use constraints include, but are not limited to, endangered species, sensitive wetlands, areas with severe or unstable slopes, river or bay crossings, and historic districts.

1 Modifications to the mobility targets could include changing the hour measured from the
2 30th highest hour, using multiple hour measures, or considering weekday or seasonal
3 adjustments. Development of corridor or area mobility targets is also allowed. ODOT's
4 policy is to utilize a v/c based target and methodology as the initial measure, as this will
5 standardize and simplify implementation issues throughout the state. Where v/c-based
6 approaches may not meet all needs and objectives, ~~development of~~developing alternative
7 mobility targets ~~utilizing~~using non v-c-based measures, may also be pursued.

11 In support of establishing the alternative mobility target, the plan shall include feasible
12 actions for:

- 14 • Providing a network of local streets, collectors and arterials to relieve traffic
15 demand on state highways and to provide convenient pedestrian and bicycle
16 ways;
- 18 • Managing access and traffic operations to minimize traffic accidents, avoid traffic
19 backups on ramps, accommodate freight vehicles and make the most efficient use
20 of existing and planned highway capacity;
- 22 • Managing traffic demand and incorporating transportation system management
23 tools and information, where feasible, to manage peak hour traffic loads on state
24 highways;
- 26 • Providing and enhancing multiple modes of transportation; and
- 28 • Managing land use to limit vehicular demand on state highways consistent with
29 Policy 1B (Land Use and Transportation Policy).

31 The plan shall include a financially feasible implementation program and shall
32 demonstrate that the proposed mobility target(s) are consistent with and support locally
33 adopted land use, economic development, and multimodal transportation policy and
34 objectives. In addition, the plan shall demonstrate strong local commitment, through
35 adopted policy and implementation strategies, to carry out the identified improvements
36 and other actions.

38 ODOT understands that in certain areas of the state, achieving the established mobility
39 targets will be difficult and that regional and local policies must be balanced with
40 transportation system performance. ODOT is committed to work with MPOs and local
41 jurisdictions on system-level analysis of alternative mobility targets and to participate in
42 public policy-level discussions where balancing mobility and other regional and
43 community objectives can be adequately addressed.

45 In developing and applying alternative mobility targets and methodologies for facilities
46 throughout the state, ODOT will consider tools and methods that have been successfully
47 used previously for a particular facility and/or within a specific metropolitan area or
48 region. Specific mobility targets may vary from one community or area to another

1 depending on local circumstances. It is the objective of this policy to maintain
2 consistency in the selection and application of analysis and implementation
3 methodologies over time as they are applied to a specific facility or to a system of related
4 facilities within a defined community or region.

5
6 ODOT will provide guidance documents and will work with local jurisdictions and others
7 to apply best practices that streamline development of alternative mobility targets.

8 9 ***Action 1F.4***

10
11 Alternative mobility targets may also be developed for facilities where an investment has
12 been, or is planned to be, made ~~which that~~ provides significantly more capacity than is
13 needed to serve the forecasted traffic demand based on the existing adopted local
14 comprehensive plan. In these situations, and it is possible to preserve that excess capacity
15 for traffic growth beyond the established planning horizon or traffic growth resulting
16 from local legislative plan amendments or plan amendments associated with OAR 731-
17 017.

18 19 ***Action 1F.5***

20
21 For purposes of evaluating amendments to transportation system plans, acknowledged
22 comprehensive plans and land use regulations subject to OAR 660-12-0060, in situations
23 where the volume to capacity ratio or alternative mobility target for a highway segment,
24 intersection or interchange is currently above the mobility targets in Table 6 or Table 7 or
25 those otherwise approved by the Oregon Transportation Commission, or is projected to
26 be, above the mobility targets in Table 6 or Table 7 at the planning horizon, or those
27 otherwise approved by the Commission, and transportation improvements are not
28 planned within the planning horizon to bring performance to the established target, the
29 mobility target is to avoid further degradation. If an amendment subject to OAR 660-012-
30 0060 to a transportation system plan, acknowledged comprehensive plan or land use
31 regulation increases the volume to capacity ratio further, or degrades the performance of
32 a facility so that it does not meet an adopted mobility target, at the planning horizon, it
33 will significantly affect the facility unless it falls within the thresholds listed addressed
34 through the language below regarding determination of for a small increase in traffic.

35
36 In addition to the capacity increasing improvements that may be required ~~as a condition~~
37 ~~of approval to mitigate impacts~~, other performance improving actions to consider include,
38 but are not limited to:

- 39
40 • System connectivity improvements for vehicles, bicycles and pedestrians.
41
42 • Transportation demand management (TDM) methods to reduce the need for
43 additional capacity.
44
45 • Multi-modal (bicycle, pedestrian, transit) opportunities to reduce vehicle demand.
46

- Operational improvements to maximize use of the existing system.
- Land use techniques such as trip caps / budgets to manage trip generation.

In applying “avoid further degradation” for state highway facilities already operating above the mobility targets in Table 6 or Table 7 or those otherwise approved by the Oregon Transportation Commission, or facilities projected to be above the mobility targets at the planning horizon, a small increase in traffic does not cause “further degradation” of the facility.

The threshold for a small increase in traffic between the existing plan and the proposed amendment is defined in terms of the increase in total average daily trip volumes as follows:

- Any proposed amendment that does not increase the average daily trips by more than 400.
- Any proposed amendment that increases the average daily trips by more than 400 but less than 1001 for state facilities where:
 - The annual average daily traffic is less than 5,000 for a two-lane highway
 - The annual average daily traffic is less than 15,000 for a three-lane highway
 - The annual average daily traffic is less than 10,000 for a four-lane highway
 - The annual average daily traffic is less than 25,000 for a five-lane highway
- If the increase in traffic between the existing plan and the proposed amendment is more than 1000 average daily trips, then it is not considered a small increase in traffic and the amendment causes further degradation of the facility and would follow be subject to existing processes for resolution.

In applying OHP mobility targets to analyze mitigation, ODOT recognizes that there are many variables and levels of uncertainty in calculating volume-to-capacity ratios, particularly over ~~the~~ a specified planning horizon. After negotiating reasonable levels of mitigation for actions required under OAR 660-012-0060, ODOT considers calculated values for v/c ratios that are within 0.03 of the adopted target in the OHP to be considered in compliance with the target. ~~It is not the intent of the agency to consider variation within modest levels of uncertainty in violation of mobility targets for reasonable mitigation. The adopted specific mobility target still applies for determining significant affect under OAR 660-012-0060.~~

1 **Action 1F.6**

2
3 When making recommendations to local governments about development permit
4 applications and potential actions for mitigation related to local development proposals
5 and criteria consider and balance the following:

- 6
7 • OHP mobility targets;
8
9 • Community livability objectives;
10
11 • State and local economic development objectives;
12
13 • Safety for all modes of travel; and
14
15 • Opportunities to meet mobility needs for all modes of travel.

16
17 Encourage local jurisdictions to consider OHP mobility targets when preparing local
18 development ordinances and approval criteria to evaluate proposed development
19 applications that do not trigger Section 660-012-0060 of the TPR.

20
21 **Action 1F.7**

22
23 Consider OHP mobility targets as guidance to ODOT's highway access management
24 program. Balance economic development objectives of properties abutting state highways
25 with transportation safety and access management objectives of state highways in a
26 manner consistent with local transportation system plans and the land uses permitted in
27 acknowledged local comprehensive plans.

28
29 When evaluating OHP mobility targets in access management decisions for unsignalized
30 intersections consider the following:

- 31
32 • The highest priority for the use of OHP mobility targets in guiding access
33 management practices is to address the state highway through traffic movements
34 and the movements exiting the state highway facility.
35
36 • When evaluating traffic movements from an approach entering or crossing a state
37 highway, the priority is to consider the safety of the movements. While a v/c ratio
38 for a specific movement greater than 1.0 is an indication of a capacity problem, it
39 does not necessarily mean the traffic movement is unsafe. Apply engineering
40 practices and disciplines in the analysis and design of highway approaches to
41 ensure traffic movements meet safety objectives for the program.

42
43 Private approaches at signalized intersections will be treated as all other signalized
44 intersections under OHP Action 1F.1.
45

1 **Action 1F.8**

2
3 Consider OHP mobility targets when implementing operational improvements such as
4 traffic signals and ITS improvements on the state highway system. The OHP mobility
5 targets are meant to be used as a guide to compare the relative benefits of potential
6 operational solutions rather than as a firm ~~target~~ standard to be met. The main goal of
7 operational projects is to improve system performance - which may include mobility,
8 safety or other factors - from current or projected conditions.

9
10 **Action 1F.9**

11
12 Enhance coordination and consistency between planning and project design decisions
13 whenever possible. Ensure that project development processes and design decisions take
14 into account statewide mobility and economic objectives, including design standards,
15 while balancing community mobility, livability and economic development objectives
16 and expectations. Consider practical design principles that take a systematic approach to
17 transportation solutions in planning and project development processes. Practical design
18 principles strive to deliver the broadest benefits to the transportation system possible
19 within expected resources.

20
21 **Action 1F.10**

22
23 The 2011 amendments to OHP Policy 1F and associated amendments to the TPR may
24 lead to impacts in traffic mobility in specific corridors and on the overall state highway
25 system that cannot be fully anticipated. ODOT shall evaluate the effectiveness of the
26 policy in meeting broad objectives, the impacts on transportation system performance and
27 safety, and any unintended consequences resulting from implementation within three
28 years of adoption of this Action. Following the initial review, the mobility targets and
29 associated policies will be reviewed periodically based on a schedule determined by the
30 Oregon Transportation Commission.

Table 6: Volume to Capacity Ratio Targets for Peak Hour Operating Conditions

VOLUME TO CAPACITY RATIO TARGETS OUTSIDE METRO ^{A,B,C,D}								
Highway Category		Inside Urban Growth Boundary					Outside Urban Growth Boundary	
		STA ^B E	MPO	Non-MPO Outside of STAs where non-freeway posted speed ≤ 35 mph, or a Designated UBA	Non-MPO outside of STAs where non- freeway speed > 35 mph, but <45 mph	Non-MPO where non- freeway speed limit ≥ 45 mph	Unincorporated Communities ^{E,F}	Rural Lands
Interstate Highways		N/A	0.85	N/A	N/A	0.80	0.80 0.70	0.75 0.70
Statewide Expressways		N/A	0.85	0.80	0.80	0.80	0.80 0.70	0.75 0.70
Freight Route on a Statewide Highway		0.90	0.85	0.85	0.80	0.80	0.80 0.70	0.75 0.70
Statewide (not a Freight Route)		0.95	0.90	0.90	0.85	0.80	0.80 0.75	0.80 0.70
Freight Route on a Regional or District Highway		0.95	0.90	0.90	0.85	0.85	0.80 0.75	0.80 0.70
Expressway on a Regional or District Highway		N/A	0.90	N/A	0.85	0.85	0.80 0.75	0.80 0.70
Regional Highways		1.0	0.95	0.90	0.85	0.85	0.85 0.75	0.80 0.70
District / Local Interest Roads		1.0	0.95	0.95	0.90	0.90	0.85 0.80	0.85 0.75

Notes for Table 6

^A Unless the Oregon Transportation Commission has adopted an alternative mobility target for the impacted facility, the mobility targets in Tables 6 are considered standards for purposes of determining compliance with OAR 660-012, the Transportation Planning Rule.

^B For the purposes of this policy, the peak hour shall be the 30th highest annual hour. This approximates weekday peak hour traffic in larger urban areas. Alternatives to the 30th highest annual hour may be considered and established through alternative mobility target processes.

^{B,C} Highway design requirements are addressed in the Highway Design Manual (HDM).

^{C,D} See Action 1F.1 for additional technical details.

^{D,E} Interstates and Expressways shall not be identified as Special Transportation Areas.

^{E,F} For unincorporated communities inside MPO boundaries, MPO mobility targets shall apply.

Table 7: Volume to Capacity Ratio Targets within Portland Metropolitan Region

VOLUME TO CAPACITY RATIO TARGETS INSIDE METRO ^{A,B}		
Location	Target	
	1 st hour	2 nd hour
Central City Regional Centers Town Centers Main Streets Station Communities	1.1	.99
Corridors ^B Industrial Areas Intermodal Facilities Employment Areas Inner Neighborhoods Outer Neighborhoods	.99	.99
I-84 (from I-5 to I-205) ^C	1.1	.99
I-5 North ^C (from Marquam Bridge to Interstate Bridge)	1.1	.99
OR 99E ^C (from Lincoln Street to OR 224 Interchange)	1.1	.99
US 26 ^C (from I-405 to Sylvan Interchange)	1.1	.99
I-405 ^C (I-5 South to I-5 North)	1.1	.99
Other Principal Arterial Routes	.99	.99
I-205 ^C I-84 (east of I-205) I-5 (Marquam Bridge to Wilsonville) ^C OR 217 ^C US 26 (west of Sylvan) US 30 OR 8 (Murray Blvd to Brookwood Avenue) ^C OR 224 ^C OR 47 OR 213 242 nd /US26 in Gresham OR 99W		
Areas of Special Concern^D		
Beaverton Regional Center	1.0	^D
Highway 99W (I-5 to Tualatin Road)	.95	

Notes for Table 7: ~~Maximum volume to capacity ratios~~ Deficiency thresholds for two hour peak operating conditions through a ~~20-year~~ the planning horizon for state highway sections within the Portland metropolitan area urban growth boundary.

^A Unless the Oregon Transportation Commission has adopted an alternative mobility target for the impacted facility, the mobility targets in Tables 7 are considered standards for purposes of determining compliance with OAR 660-012, the Transportation Planning Rule.

See Action 1F.1 for additional technical details.

^B The volume-to-capacity ratios in Table 7 are for the highest two consecutive hours of weekday traffic volumes. The second hour is defined as the single 60-minute period either before or after the peak 60-minute period, whichever is highest. See Action 1.F.1 for additional technical details.

^{CB} A corridor refinement plan, which will likely include a tailored mobility policy, is required by the Metro 2035 Regional Transportation Plan for this corridor for certain state facilities. Corridors that are also state highways are 99W, Sandy Boulevard, Powell Boulevard, 82nd Avenue, North Portland Road, North Denver Street, Lombard Street, Hall Boulevard, Farmington Road, Canyon Road, Beaverton Hillsdale Highway, Tualatin Valley Highway (from Hall Boulevard to Cedar Hills Boulevard and from Brookwood Street to E Street in Forest Grove), Scholls Ferry Road, 99E (from Milwaukie to Oregon City and Highway 43).

^C Thresholds shown are for interim purposes only; refinement plans for these corridors are required in Metro's Regional Transportation Plan and will include a recommended motor vehicle performance policy for each corridor.

^D Areas with this designation are planned for mixed use development, but are also characterized by physical, environmental or other constraints that limit the range of acceptable transportation solutions for addressing a level of service need, but where alternative routes for regional through traffic are provided. In these areas, substitute performance measures are allowed by OAR 660.012.0060(2)(d). Provisions for determining the alternative performance measures are included in Section 6.7.7 of the 2000 RTP. The OHP mobility target for state highways in these areas applies until the alternative performance targets are adopted in local plans and approved by the Oregon Transportation Commission.