



Background

The Land Conservation and Development Commission (LCDC) adopted amendments to Oregon Administrative Rules (OAR) chapter 660, division 12, known as the Transportation Planning Rules, in 2022 to support communities taking action to meet Oregon’s climate pollution reduction targets and achieve more equitable land use and transportation outcomes, while providing more housing and transportation choices for Oregonians.

The Department of Land Conservation and Development (DLCD) is providing this resource as part of our technical assistance program. Please see our web site for more information or to sign up for notices:

www.oregon.gov/lcd/CL/Pages/CFEC

The Transportation Planning Rules require cities and counties in metropolitan areas and Metro to report annually on progress towards meeting the requirements in the Transportation Planning Rules and the Metropolitan Greenhouse Gas Reduction Targets rules (OAR chapter 660, division 44). In most years, this report will be a short summary (minor report) of local activities during the year. Every four or five years, cities and counties will produce a major report tracking performance across a range of measures.

Regular reporting will provide accountability and transparency for the public and decision makers. Over time, these reports will create a record and tell a story about progress at the local and state level, and where changes may be needed to meet our goals.

About this document

This document provides guidance from the Department of Land Conservation and Development. This guidance can assist in the interpretation of an administrative rule but does not itself have the force of rule. This document includes recommendations that may go beyond the minimum necessary to comply with the rule.

This document was published on March 13, 2024. This is version 1.1 of this document. The latest version of this document is available online:

www.oregon.gov/lcd/CL/Documents/GuidanceReporting.pdf

Applicability

The reporting requirements in the rules apply to cities and counties within Oregon’s eight metropolitan areas. If you represent a city or county in Oregon and aren’t sure if rules for metropolitan areas apply to you, please review the following document, which includes a summary of responsibilities for affected local governments:

www.oregon.gov/lcd/CL/Documents/CFEEOverviewImplementation.pdf

Every city and county in metropolitan areas is responsible for reporting, with some exceptions:

- In the Portland metropolitan area, Metro is responsible for submitting a report on behalf of the region. Individual cities and counties in the Portland metropolitan area should coordinate with Metro to assist in preparation of the report, but do not individually report to DLCD.
- Counties need only report for those portions of the county within the urban growth boundary inside the metropolitan area. Counties may submit a joint report with a city for the entire urban growth area.
- Cities and counties that have requested and received an exemption from reporting under either OAR 660-012-0100(4) or OAR 660-012-0900(8) need not submit a report, or must submit a limited report, as described in the exemption. More details on exemptions are provided below.

A list of cities and counties and their reporting responsibilities is included later in this document.

Minor and Major Reports

As provided in OAR 660-012-0900(5), all reporting cities and counties are required to submit either a minor or a major report each year:

- **Minor reports** are required each year where a major report is not required. Minor reports include a short qualitative summary of transportation planning activities during the year.
- **Major reports** are required in years where the metropolitan planning organization (MPO) in the metropolitan area has adopted a regional transportation plan to meet federal transportation planning requirements. MPOs adopt this plan once every four or five years. Major reports include information required in a minor report as well as reporting on progress toward meeting local targets set against a set of performance measures. These performance measures are either adopted in a regional scenario plan, or provided in OAR 660-012-0905.

The reporting period is a calendar year. Reports must be submitted prior to May 31 in the year following the reporting period.

Report Contents

The rules list the required contents of minor and major reports. This information will be compiled and published by the department. Cities and counties should include enough information to provide a good picture of what is going on locally to the department and commission, as well as other audiences that may review the published report.

Minor Reports

The contents of minor reports are described in OAR 660-012-0900(6). Minor reports include four required elements. The department expects that the time needed to gather the information

for minor reports will be relatively minimal each year, particularly after completing the report for the first time.

- (a) A narrative summary of the state of coordinated land use and transportation planning in the planning area over the reporting year, including any relevant activities or projects undertaken or planned by the city or county;**

This may be as short as a paragraph, or more detailed, depending on the size and complexity of the city or county, and the level of planning activity during the reporting year.

- (b) The planning horizon date of the acknowledged transportation system plan, a summary of any amendments made to the transportation system plan over the reporting year, and a forecast of planning activities over the near future that may include amendments to the transportation system plan;**

This requirement is relatively straightforward; however this information has not been consistently collected and available in the past. The department expects this information will be useful for the state’s effort to coordinate future investments in transportation system planning.

- (c) Copies of reports made in the reporting year for progress towards centering the voices of underserved populations in processes at all levels of decision-making as provided in OAR 660-012-0130 and a summary of any equity analyses conducted as provided in OAR 660-012-0135; and**

Rule 660-012-0130 encompasses provisions for local decision-making with underserved populations. Section (3) of that rule directs cities and counties to “regularly assess and report on progress” by doing the following:

- “(a) Reporting to the department annually as provided in OAR 660-012-0900;
(b) Making regular reports to the planning commission and governing body of the city or county; and
(c) Making regular public reports to the community.”*

The minor report meets the requirement in subsection (a). The minor report should include copies of any reports listed in subsections (b) or (c) made during the reporting year.

Rule 660-012-0135 requires local governments to conduct equity analyses in certain situations. The minor report should include a summary of any major or engagement-focused equity analyses conducted during the reporting year.

- (d) Any alternatives reviews undertaken as provided in OAR 660-012-0830, including those underway or completed.**

This is simply a list of any alternatives reviews underway or completed during the reporting period. If no alternatives reviews were underway or completed during the reporting period, the report need only say this.

“Underway” means having been initiated as provided in OAR 660-012-0830(2)(a). An alternatives review may be underway over more than one reporting period, and should be reported in each period where it is active.

Major Reports

The contents of major reports are described in OAR 660-012-0900(7). Major reports include three required elements, each of which has required sub-elements. The information needed to complete a major report is more extensive than that required for a minor report. As soon as possible, cities and counties should create local processes to collect and maintain the needed data in preparation for the next major report.

(a) All information required in a minor report as provided in section (6);

See above for a description of the contents of a minor report. The major report must also include each of these elements.

(b) For reporting cities and counties:

These responses relate to the local jurisdiction’s responsibilities to reduce transportation related climate pollution as provided in ORS 184.899(2). This subsection of the statute reads:

- “(2) Except as provided in subsection (3) of this section, the local governments within the boundaries of a metropolitan planning organization, after consultation with and in cooperation with the metropolitan planning organization and state agencies, shall:*
- (a) Consider whether any immediate action can be taken to reduce greenhouse gas emissions.*
 - (b) Consider how regional transportation plans could be altered to reduce greenhouse gas emissions.”*

The department recommends that this information be developed as part of the regional transportation plan update completed by the metropolitan planning organization.

(A) A description of what immediate actions the city or county has considered to be taken to reduce greenhouse gas emissions as provided in ORS 184.899(2); and

This response is expected to be a narrative summary of any “immediate” actions the reporting jurisdiction has taken in accordance with the provisions of ORS 184.899(2)(a).

(B) A description of the consultations with the metropolitan planning organization on how the regional transportation plan could be altered to reduce greenhouse gas emissions as provided in ORS 184.899(2).

As above, this response is expected to be a narrative summary of the consultations with the metropolitan planning organization on the regional transportation plan, and how it could work to reduce greenhouse gas emissions, as provided in ORS 184.899(2)(b).

(c) Reporting for each regional and local performance measures as provided in OAR 660-012-0905 or OAR 660-044-0110 including:

This part of the major report includes the key quantitative performance measure reporting to demonstrate progress toward meeting adopted local performance targets. Clear, consistent reporting of each of these elements for cities and counties across the state will help the public and leaders understand where there have been successes and identify areas where more work may need to happen.

Reporting on these measures will be informed by the performance targets as provided in either OAR 660-012-0905 or OAR 660-044-0110. See below for information about submitting a request for an exemption if necessary.

(A) Baseline data;

This response is required for transparently and clearly describing the baseline data used for determining each performance target. The baseline year will be on or near the year when the targets were first set. The baseline data should remain consistent over time.

(B) Baseline projections of expected outcomes from acknowledged plans;

This response will be connected to the baseline data. These projections form the basis for performance targets over time.

(C) An assessment of whether the city, county, or Metro has met or is on track to meet each performance target for each reporting year between the base year and planning horizon year set as provided in OAR 660-012-0910;

This response must include the adopted target for each standard, as well as the assessed actual performance for each standard. The response may also include qualitative or quantitative explanatory information for any standard, including local conditions or actions that may have contributed to the actual performance figure.

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

A response is needed for each target that is not met. If all targets are met, no response is required.

For each target where a response is required, the report must include a proposed corrective action or set of actions that could reasonably result in achieving the future target in the next major report. The proposed corrective actions may include updates to the transportation system plan, other land use actions, parking or transportation system management actions, revenue actions, project reprioritizations, or other actions that the local government may take to achieve targets.

(E) An assessment of whether the reporting city or county has adopted local amendments to implement the approved land use and transportation scenario plan as provided in OAR 660-044-0130;

This response is only required in metropolitan areas that have approved land use and transportation scenario plans. As of 2024, this is the Portland metropolitan area. The Eugene-Springfield and Salem-Keizer metropolitan areas are required to adopt local

amendments to implement approved land use and scenario plans in the next few years.

The assessment required in this response is for those elements in the approved scenario plan requiring local adoption.

(F) For any amendments to implement the approved land use and transportation scenario plan as provided in OAR 660-044-0130 that have not yet been adopted, a proposal for the corrective actions that will be taken to adopt the amendments; and

This response is only required for reports that include an assessment as described in paragraph (E) above.

This response must include proposed corrective actions to ensure that any amendments needing adoption to implement the scenario plan, as described in the assessment, are adopted.

(G) The status of any corrective actions identified in prior reports.

This response would require there to have been an earlier major report that contained proposed corrective actions, as detailed in paragraphs (D) and (F). This response should detail the progress of each proposed corrective action, including any successes or challenges.

Report Submittal

Reports must be submitted no later than May 31 of the calendar year following the reporting year. The first report is due May 31, 2024 for the 2023 reporting year.

Submission of Minor Reports

Minor reports may be submitted electronically to the department online via a link that will be directly distributed to local government partners.

The department recommends preparing answers for the minor report ahead of time to paste into the electronic form online.

Submission of Major Reports

Major reports may be submitted to the department by email:

DLCD.CFEC@dlcd.oregon.gov

The major report should be sent in a format department staff can easily read and copy, such as plain text, PDF, or Word.

Review by DLCD

Review of Minor Reports

As provided in OAR 660-012-0915(1), the department will review the submitted minor report for completeness within 30 days. The department will notify the submitter of any missing items. The submitter then has 30 days, or longer if the director grants an extension, to provide the missing information.

The department will post minor reports found to be complete online and provide notice to the submitter.

Review and Approval of Major Reports

The review process for major reports is more substantial, as provided in OAR 660-012-0915 section (2) through (6). As with minor reports, the department will review major reports for completeness within 30 days.

The remaining parts of the review process are detailed and provide for public review and comments, and eventually an order approving the report by the director. OAR 660-012-0915 provides an avenue for appeals. A detailed discussion of this process is beyond the scope of this guidance document.

Exemptions from Reporting

General Exemptions

Cities and counties with fewer than 10,000 residents inside an urban area may ask to be exempt from some or all provisions of the Transportation Planning Rules, including reporting requirements. This provision is in OAR 660-012-0100(4). Cities and counties that have been exempted from OAR 660-012-0900 need not submit reports for years where they have received an exemption for the entire reporting year. A list of exemptions is available on the department's website:

<https://www.oregon.gov/lcd/CL/Documents/ExemptionsReport.pdf>

Annual Reporting Exemptions

OAR 660-012-0900(8) provides for the director to grant a city or county an exemption to a requirement to include any required element of a minor or major report. This path is available regardless of population.

- The reporting jurisdiction must submit a written request for a reporting exemption prior to the due date of the report. Reports and exemption requests are due no later than May 31 of the calendar year following the reporting year.
- The director must be able to find “that the requestor has established that collection and reporting of the information would not be possible or would place an undue burden on the city or county.”

Much of the information required to submit a full major report will be unavailable in the first few years of reporting prior to setting of performance targets as provided in either OAR 660-012-0905 or 660-044-0110. During this period, the department expects to provide exemptions from relevant major report elements upon request.

Counties and Joint Reporting

OAR 660-012-0900(9) provides for counties to jointly report with a city for the entire urban area. The department recommends counties use this option rather than report separately for small urbanized unincorporated areas.

Contact Information

The department maintains a web page with information on the rules, and how local governments may best implement them:

www.oregon.gov/lcd/CL/Pages/CFEC.aspx

If you have questions on the reporting process, please contact DLCD staff: Bill Holmstrom, bill.holmstrom@dlcd.oregon.gov, 971-375-5975.

Reporting Jurisdictions

This is a list of all cities and counties in Oregon’s eight metropolitan areas, and their reporting responsibilities in 2024 for the 2023 reporting year.

Adair Village	Minor report	Lake Oswego	Metro reports on behalf
Albany	Major report	Lane County	Minor report
Ashland.....	Minor report	Linn County.....	Major report
Beaverton.....	Metro reports on behalf	Marion County.....	Major report-Albany area; Minor report-Salem area
Bend.....	Minor report	Maywood Park.....	Metro reports on behalf
Benton County.....	Major report-Albany area; Minor report-Corvallis area	Medford	Minor report
Central Point.....	Minor report	Metro	Major report
Clackamas County.....	Metro reports on behalf	Millersburg	Major report
Coburg	Minor report	Milwaukie.....	Metro reports on behalf
Cornelius.....	Metro reports on behalf	Multnomah County.....	Metro reports on behalf
Corvallis	Minor report	Oregon City	Metro reports on behalf
Deschutes County.....	Minor report	Philomath.....	Minor report
Durham.....	Metro reports on behalf	Phoenix.....	Minor report
Eagle Point.....	Minor report	Polk County	Exempt
Eugene	Minor report	Portland.....	Metro reports on behalf
Fairview	Metro reports on behalf	Rivergrove	Metro reports on behalf
Forest Grove	Metro reports on behalf	Rogue River.....	Minor report
Gladstone.....	Metro reports on behalf	Salem	Minor report
Gold Hill.....	Minor report	Sherwood.....	Metro reports on behalf
Grants Pass	Minor report	Springfield.....	Minor report
Gresham.....	Metro reports on behalf	Talent.....	Minor report
Happy Valley.....	Metro reports on behalf	Tangent.....	Exempt
Hillsboro	Metro reports on behalf	Tigard	Metro reports on behalf
Jackson County.....	Minor report	Troutdale.....	Metro reports on behalf
Jacksonville	Minor report	Tualatin.....	Metro reports on behalf
Jefferson	Major report	Turner	Exempt
Johnson City	Metro reports on behalf	Washington County	Metro reports on behalf
Josephine County.....	Minor report	West Linn	Metro reports on behalf
Keizer	Minor report	Wilsonville	Metro reports on behalf
King City	Metro reports on behalf	Wood Village.....	Metro reports on behalf

Disclaimer

This document aims to provide information about the rules, and how the department intends to administer the rules. Nothing in this document should be construed as Oregon Administrative Rules. A current copy of the adopted rules should be acquired from the [Oregon Secretary of State](#) and used to fulfill planning requirements.

Selected Rule Language

Selected text from the division is provided below for convenience. Please see the versions provided by the Oregon Secretary of State for the current official version of administrative rules:

<https://secure.sos.state.or.us/oard/view.action?ruleNumber=660-012-0900>

<https://secure.sos.state.or.us/oard/view.action?ruleNumber=660-012-0915>

660-012-0900: Reporting

- (1) Cities and counties outside of the planning area of Metro shall report annually on progress toward meeting the requirements in division 44 and this division.
- (2) Metro shall prepare a report annually on progress toward meeting the requirements in division 44 and this division. Cities and counties within the planning area of Metro shall coordinate with Metro and provide information to Metro. Cities and counties within the planning area of Metro are not required to report directly to the department as provided in this rule.
- (3) Cities, counties, and Metro shall submit the report to the director no later than May 31 of each year for the report for the previous calendar year.
- (4) The director shall provide for a method of submission. The director shall review reports as provided in OAR 660-012-0915.
- (5) Cities, counties, and Metro shall submit either a minor report, as provided in section (6), or a major report, as provided in section (7), each year.
 - (a) Minor reports shall be submitted each year where a major report is not submitted.
 - (b) Major reports shall be submitted for each year that the metropolitan planning organization representing the city or county approved a regional transportation plan as provided in 23 CFR § 450.324.
- (6) A minor report must include the following information:
 - (a) A narrative summary of the state of coordinated land use and transportation planning in the planning area over the reporting year, including any relevant activities or projects undertaken or planned by the city or county;
 - (b) The planning horizon date of the acknowledged transportation system plan, a summary of any amendments made to the transportation system plan over the reporting year, and a forecast of planning activities over the near future that may include amendments to the transportation system plan;
 - (c) Copies of reports made in the reporting year for progress towards centering the voices of underserved populations in processes at all levels of decision-making as provided in

OAR 660-012-0130 and a summary of any equity analyses conducted as provided in OAR 660-012-0135; and

(d) Any alternatives reviews undertaken as provided in OAR 660-012-0830, including those underway or completed.

(7) A major report must include the following information:

(a) All information required in a minor report as provided in section (6);

(b) For reporting cities and counties:

(A) A description of what immediate actions the city or county has considered to be taken to reduce greenhouse gas emissions as provided in ORS 184.899(2); and

(B) A description of the consultations with the metropolitan planning organization on how the regional transportation plan could be altered to reduce greenhouse gas emissions as provided in ORS 184.899(2).

(c) Reporting for each regional and local performance measures as provided in OAR 660-012-0905 or OAR 660-044-0110 including:

(A) Baseline data;

(B) Baseline projections of expected outcomes from acknowledged plans;

(C) An assessment of whether the city, county, or Metro has met or is on track to meet each performance target for each reporting year between the base year and planning horizon year set as provided in OAR 660-012-0910;

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

(E) An assessment of whether the reporting city or county has adopted local amendments to implement the approved land use and transportation scenario plan as provided in OAR 660-044-0130;

(F) For any amendments to implement the approved land use and transportation scenario plan as provided in OAR 660-044-0130 that have not yet been adopted, a proposal for the corrective actions that will be taken to adopt the amendments; and

(G) The status of any corrective actions identified in prior reports.

(8) Upon a written request for an exemption submitted to the department prior to the due date of a report, the director may grant a city or county an exemption to a requirement to include any required element of a report under sections (6) or (7) when the director determines that the requestor has established that collection and reporting of the information would not be possible or would place an undue burden on the city or county.

(9) Counties need only report for those portions of the county within an urban growth boundary inside the metropolitan area. A county may jointly report with a city for the entire urban growth area of the city.

(10) Reports as provided by this rule are not land use decisions.

660-012-0915: Review of Reports

(1) Upon receipt of a submitted minor report as provided in OAR 660-012-0900(6):

(a) The director shall make a preliminary determination of completeness within 30 calendar days of receipt and shall notify the submitter of any missing items required under OAR 660-012-0900(6) that is not subject to an exemption under OAR 660-012-0900(8).

(b) The submitter must submit information to the department within 30 days of the director's notification under subsection (a), unless the submitter requests, and the director grants, an extension of time to submit the missing information, for a period not to exceed 90 additional days.

(c) If the submitter does not submit the missing information within the time allotted by the director, the director may refer the report for a compliance hearing as provided in OAR 660-012-0920.

(d) Once a minor report submitted as provided in OAR 660-012-0900(6) is determined to be complete, the director shall post the minor report on the department website and send notice of approval to the submitter.

(2) Upon receipt of a submitted major report as provided in OAR 660-012-0900(7):

(a) The director shall make a preliminary determination of completeness within 30 calendar days of receipt and shall notify the submitter of any missing items required under OAR 660-012-0900(7) that is not subject to an exemption under OAR 660-012-0900(8).

(b) The submitter must submit information to the department within 30 days of the director's notification under subsection (a), unless the submitter requests, and the director grants, an extension of time to submit the missing information, for a period not to exceed 90 additional days. If the submitter does not submit additional information, the director shall proceed with review of the submission as provided in sections (3) and (4).

(c) If the director does not notify the submitter of missing items within 30 days of submittal, the director shall proceed with review of the submission as provided in sections (3) and (4).

(3) Upon completion of the process in section (2), the director shall:

(a) Post a complete copy of the major report on the department's website along with the alternative findings the director may make in section (4), and a statement that any person may file a written comment regarding the submitted report no more than 21 days after the posting of the report.

(b) Provide notice to persons described under ORS 197.615(3)(a), directing them to the posting described in subsection (a) and informing them that they may file a written comment regarding the submitted report no more than 21 days after the posting of the report.

- (4) Within 60 days of completion of the process in section (2), the director shall;
- (a) Find that the submitter has met the performance targets set as provided in OAR 660-012-0910, and has adopted local amendments to implement any approved land use and transportation scenario plan as provided in OAR 660-044-0130;
 - (b) Find that the submitter has proposed adequate corrective actions to address any performance targets that were not met and adequate to meet any performance targets set as provided in OAR 660-012-0910;
 - (c) Find that the submitter has not met a performance target set as provided in OAR 660-012-0910 and has proposed inadequate corrective actions; or
 - (d) Find that the submitter has not implemented an approved land use and transportation scenario plan as provided in OAR 660-044-0130 and proposed inadequate corrective actions.
- (5) If the director makes findings described in subsections (4)(a) or (b);
- (a) The director shall issue an order approving the report. The department shall post an approval order on a public website and send notice to the submitter, and persons who provided written comment under section (3). The order must include information on the process to appeal the director's order as described in this rule.
 - (b) A person who has provided written comment under section (3) may appeal the director's order to the commission. An appeal is valid only if the appeal clearly identifies a deficiency in the submitted report based on the requirements of this division on issues raised in the written comments.
 - (c) The director shall determine if the appeal filed is valid, and the director's determination of validity is final.
 - (d) If no valid appeals are filed in response to the director's order, the order is final.
 - (e) If any valid appeals are filed in response to the director's order, then the director shall refer the report for a compliance hearing as provided in OAR 660-012-0920.
- (6) If the director makes findings described in subsections (4)(c) or (d), then the director shall refer the report for a compliance hearing as provided in OAR 660-012-0920.