720 SW Washington St.
Suite 500
Portland, OR 97205
503.243.3500
www.dksassociates.com

MEMORANDUM

DATE: November 17, 2014

TO: City of Beaverton

Cc: South Cooper Mountain Project Team

FROM: Carl Springer, Kevin Chewuk

SUBJECT: South Cooper Mountain Community Plan TPR Compliance P13036-000

The purpose of this memorandum is to summarize the Beaverton South Cooper Mountain Community Plan's compliance with the Transportation Planning Rule (TPR). References below to the "transportation analysis" refer to "Transportation Findings for Preferred Scenario", memorandum by DKS Associates, June 27, 2014. References below to "projects included in the Community Plan" refer to "Transportation System Improvements for SCMAA", memorandum by DKS Associates, October 20, 2014.

TPR Requirement	Response
660-012-0060 Plan and Land Use Regulation Amendments	
(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:	The proposed plan amendments do significantly affect one transportation facility (a portion of Loon Drive) as defined under subsection (a) and subsection (c) (A). No other transportation facilities are significantly affected under these or other subsections. See below.
(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);	The proposed plan amendments include a change to the facility classification for a segment of Loon Drive from local to collector to accommodate east-west through trips from the SCM Community Plan area. The Community Plan is also changing the classifications of Tile Flat Road and Grabhorn Road from collector to arterial to be consistent with the current Washington County TSP update. The proposed plan amendments also include new transportation facilities within the area of the plan amendment that were not previously included in the Transportation Element of the City of Beaverton's Comprehensive Plan that will improve connectivity within South Cooper Mountain.

TPR Requirement	Response
(b) Change standards implementing a functional classification system; or	No facility standards were impacted with the Community Plan.
(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.	The "Transportation Findings for Preferred Scenario" memo documents projected conditions measured at the end of the planning period identified in the adopted TSP (2035). The amendment does not include any enforceable, ongoing requirements that would demonstrably limit traffic generation.
(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;	The projected levels and types of travel and access for a segment of Loon Drive is inconsistent with its existing functional classification as a local street; therefore, the functional classification is being changed from local to collector to accommodate east-west through trips from the SCM Community Plan area. The projected levels and types of travel and access for Tile Flat Road is inconsistent with its existing functional classification as a collector; however, the functional classification is being changed to reflect its proposed role in accommodating regional travel demand in the Washington County TSP update, therefore, the Community Plan would not result in a significant effect on the facility. However, this facility will still be improved with a project included in the Community Plan. Types and levels of travel and access expected on other existing and planned transportation facilities are consistent with their functional classifications.
(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or	The proposed plan amendments do not degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan. The attached transportation analysis demonstrates that all intersections that would not be expected to meet mobility targets under the Preferred Scenario with the South Cooper Mountain Annexation area only were previously identified in the TSP (see Table 2). These intersections will be improved with projects included in the Community Plan; their performance will be unchanged or improved rather than degraded.

TPR Requirement	Response
(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.	The proposed plan amendments do not degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan. The attached transportation analysis demonstrates that all intersections that would not be expected to meet mobility targets under the Preferred Scenario with the South Cooper Mountain Annexation area only were previously identified in the TSP, with unchanged or improved performance at these intersections in the Community Plan (see Table 2).
(2) If a local government determines that there would be a significant effect, then the local government must ensure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility measured at the end of the planning period identified in the adopted TSP through one or a combination of the remedies listed in (a) through (e) below, unless the amendment meets the balancing test in subsection (2)(e) of this section or qualifies for partial mitigation in section (11) of this rule. A local government using subsection (2)(e), section (3), section (10) or section (11) to approve an amendment recognizes that additional motor vehicle traffic congestion may result and that other facility providers would not be expected to provide additional capacity for motor vehicles in response to this congestion.	As noted above, there would be a significant effect on a portion of Loon Drive as defined under subsections (1) (a) and (1) (c) (A). The findings below and the attached analysis demonstrate that the transportation facilities and improvements will be adequate to support the proposed land uses as measured at the end of the planning period identified in the adopted TSP (2035).
(a) Adopting measures that demonstrate allowed land uses are consistent with the planned function, capacity, and performance standards of the transportation facility.	N/A
(b) Amending the TSP or comprehensive plan to provide transportation facilities, improvements or services adequate to support the proposed land uses consistent with the requirements of this division; such amendments shall include a funding plan or mechanism consistent with section (4) or include an amendment to the transportation finance plan so that the facility, improvement, or service will be provided by the end of the planning period.	The proposed plan amendments will provide transportation facilities and improvements to support the proposed land uses identified in the Community Plan. The proposed projects are listed in the attached "Transportation System Improvements for SCMAA" memorandum. As detailed in the attached transportation analysis, all facilities with significant effects will be improved with projects included in the Community Plan. All intersections that would not be expected to meet mobility targets were previously identified in the TSP. Funding for the proposed projects is detailed in the South Cooper Mountain Infrastructure Funding Plan. The Funding Plan lays out mechanisms and strategies to ensure that the needed transportation facilities and improvements will be provided by the end of the planning period.

TPR Requirement	Response
(c) Amending the TSP to modify the planned function, capacity or performance standards of the transportation facility.	The proposed plan amendments include a change to the facility classification for a segment of Loon Drive from local to collector to accommodate east-west through trips from the SCM Community Plan area. The Community Plan is also changing the classifications of Tile Flat Road and Grabhorn Road from collector to arterial to be consistent with the current Washington County TSP update. These facilities will also be improved with projects included in the Community Plan.
(d) Providing other measures as a condition of development or through a development agreement or similar funding method, including, but not limited to, transportation system management measures or minor transportation improvements. Local governments shall, as part of the amendment, specify when measures or improvements provided pursuant to this subsection will be provided.	N/A
(e) Providing improvements that would benefit modes other than the significantly affected mode, improvements to facilities other than the significantly affected facility, or improvements at other locations, if the provider of the significantly affected facility provides a written statement that the system-wide benefits are sufficient to balance the significant effect, even though the improvements would not result in consistency for all performance standards.	In addition to improvements to the significantly affected facilities, the proposed plan amendments include a network of new transportation facilities (all modes) within the area of the plan amendment that will improve connectivity and reduce reliance on transportation facilities that are over capacity under the TSP baseline scenario. These include new collector streets and neighborhood routes and new bicycle and pedestrian trails
(3) Notwithstanding sections (1) and (2) of this rule, a local government may approve an amendment that would significantly affect an existing transportation facility without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility where:	Planned improvements, absent the amendment, would not be sufficient to allow three intersections to meet mobility targets, therefore the proposed plan amendments would comply with the criteria of subsection (a). No further degradation of performance at these intersections occurred with the plan amendments, consistent with subsection (b).
(a) In the absence of the amendment, planned transportation facilities, improvements and services as set forth in section (4) of this rule would not be adequate to achieve consistency with the identified function, capacity or performance standard for that facility by the end of the planning period identified in the adopted TSP.	Planned improvements, absent the amendment, would not be sufficient to allow three intersections to meet mobility targets (Scholls Ferry Road/Murray Boulevard, Scholls Ferry Road/Horizon-Teal Boulevard and Roy Rogers Road/ Scholls Sherwood Road). However, the Community Plan includes feasible projects that were not previously identified for a few of these locations to improve performance.
(b) Development resulting from the amendment will, at a minimum, mitigate the impacts of the amendment in a manner that avoids further degradation to the performance of the facility by the time of the development through one or a combination of transportation improvements or measures.	All intersections that would not be expected to meet mobility targets were previously identified in the TSP, without the amendment. No further degradation of performance at these intersections occurred with the Community Plan. The Community Plan also included feasible projects that were not previously identified for these locations to improve performance.

TPR Requirement	Response
(c) The amendment does not involve property located in an interchange area as defined in paragraph (4)(d)(C)	N/A
(d) For affected state highways, ODOT provides a written statement that the proposed funding and timing for the identified mitigation improvements or measures are, at a minimum, sufficient to avoid further degradation to the performance of the affected state highway. However, if a local government provides the appropriate ODOT regional office with written notice of a proposed amendment in a manner that provides ODOT reasonable opportunity to submit a written statement into the record of the local government proceeding, and ODOT does not provide a written statement, then the local government may proceed with applying subsections (a) through (c) of this section.	N/A
(4) Determinations under sections (1)–(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.	The attached transportation analysis was coordinated with Washington County as well as other adjacent local jurisdictions and ODOT through review by the project's Technical Advisory Committee, which includes all affected jurisdictions.
(a) In determining whether an amendment has a significant effect on an existing or planned transportation facility under subsection (1)(c) of this rule, local governments shall rely on existing transportation facilities and services and on the planned transportation facilities, improvements and services set forth in subsections (b) and (c) below.	As described further below, the attached analysis relies on existing transportation facilities and services and planned transportation facilities that meet the criteria in subsections (b) and (c).
(b) Outside of interstate interchange areas, the following are considered planned facilities, improvements and services:	Only financially constrained projects were assumed, included those from the Metro Regional Transportation Plan, Beaverton Transportation System Plan, Washington County Transportation System Plan, and Hillsboro Transportation System Plan.
(A) Transportation facilities, improvements or services that are funded for construction or implementation in the Statewide Transportation Improvement Program or a locally or regionally adopted transportation improvement program or capital improvement plan or program of a transportation service provider.	
(B) Transportation facilities, improvements or services that are authorized in a local transportation system plan and for which a funding plan or mechanism is in place or approved. These include, but are not limited to, transportation facilities, improvements or services for which: transportation systems development charge revenues are being collected; a local improvement district or reimbursement district has been established or will be established prior to development; a development agreement has been adopted; or conditions of approval to fund the improvement have been adopted.	
(C) Transportation facilities, improvements or services in a metropolitan planning organization (MPO) area that are part of the area's federally-approved, financially constrained regional transportation system plan.	

TPR Requirement	Response
(D) Improvements to state highways that are included as planned improvements in a regional or local transportation system plan or comprehensive plan when ODOT provides a written statement that the improvements are reasonably likely to be provided by the end of the planning period.	
(E) Improvements to regional and local roads, streets or other transportation facilities or services that are included as planned improvements in a regional or local transportation system plan or comprehensive plan when the local government(s) or transportation service provider(s) responsible for the facility, improvement or service provides a written statement that the facility, improvement or service is reasonably likely to be provided by the end of the planning period.	
(c) Within interstate interchange areas, the improvements included in (b)(A)–(C) are considered planned facilities, improvements and services, except where:	N/A. The Community Plan is outside of interstate interchange areas.
(A) ODOT provides a written statement that the proposed funding and timing of mitigation measures are sufficient to avoid a significant adverse impact on the Interstate Highway system, then local governments may also rely on the improvements identified in paragraphs (b)(D) and (E) of this section; or	
(B) There is an adopted interchange area management plan, then local governments may also rely on the improvements identified in that plan and which are also identified in paragraphs (b) (D) and (E) of this section.	
(d) As used in this section and section (3):	
(5) The presence of a transportation facility or improvement shall not be a basis for an exception to allow residential, commercial, institutional or industrial development on rural lands under this division or OAR 660-004-0022 and 660-004-0028.	The proposed plan amendments do not include an exception to allow development on rural lands; therefore, this section is not applicable.
(6) In determining whether proposed land uses would affect or be consistent with planned transportation facilities as provided in sections (1) and (2), local governments shall give full credit for potential reduction in vehicle trips for uses located in mixed-use, pedestrian-friendly centers, and neighborhoods as provided in subsections (a)–(d) below;	No reductions in motor vehicle trips were assumed for the attached transportation analysis; therefore, this section is not applicable.
(7) Amendments to acknowledged comprehensive plans and land use regulations which meet all of the criteria listed in subsections (a)–(c) below shall include an amendment to the comprehensive plan, transportation system plan the adoption of a local street plan, access management plan, future street plan or other binding local transportation plan to provide for on-site alignment of streets or accessways with existing and planned arterial, collector, and local streets surrounding the site as necessary to implement the requirements in OAR 660-012-0020(2)(b) and 660-012-0045(3):	This section is not relevant because the Community Plan complies with the planned streets and regulations of the Beaverton TSP, therefore it would not meet the criteria of subsection (b). The Community Plan streets also comply with the block spacing standards in the TSP.

TPR Requirement	Response
(a) The plan or land use regulation amendment results in designation of two or more acres of land for commercial use;	The proposed plan amendments would result in the designation of two or more acres of land for commercial use, but the Community Plan would not meet the criteria of subsection (b), therefore, this subsection is not applicable.
(b) The local government has not adopted a TSP or local street plan which complies with OAR 660-012-0020(2)(b) or, in the Portland Metropolitan Area, has not complied with Metro's requirement for street connectivity as contained in Title 6, Section 3 of the Urban Growth Management Functional Plan; and	The Beaverton TSP implements Metro's street connectivity requirements. The Community Plan streets comply with the block spacing standards in the TSP, therefore, this section is not applicable.
(c) The proposed amendment would significantly affect a transportation facility as provided in section (1).	The proposed plan amendments would significantly affect one street, but the Community Plan would not meet the criteria of subsection (b), therefore, this subsection is not applicable.
(8) A "mixed-use, pedestrian-friendly center or neighborhood" for the purposes of this rule, means:	This section is not relevant because no reductions in motor vehicle trips were assumed under section (6).
(9) Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned transportation facility if all of the following requirements are met.	The proposed plan amendments do not meet the requirements identified in subsections (a) through (c) because they include changes to the comprehensive plan map; therefore, this section is not applicable.
(a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map;	The proposed plan amendments include changes to the comprehensive plan map; therefore, this section is not applicable.
(b) The local government has an acknowledged TSP and the proposed zoning is consistent with the TSP; and	The proposed plan amendments include changes to the comprehensive plan map; therefore, this section is not applicable.
(c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area.	The proposed plan amendments include changes to the comprehensive plan map and the area was not exempted; therefore, this section is not applicable.

TPR Requirement	Response
(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 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.	The proposed plan amendment does not meet the requirements of subsection (a) of this section; therefore, this section is not applicable.
(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 (B) is consistent with the definition of an MMA and consistent with the function of the MMA as described in the findings designating the MMA.	The proposed plan amendment is not within a multimodal mixed-use area (MMA), therefore, this section is not applicable.
(11) A local government may approve an amendment with partial mitigation as provided in section (2) of this rule if the amendment complies with subsection (a) of this section, the amendment meets the balancing test in subsection (b) of this section, and the local government coordinates as provided in subsection (c) of this section.	The proposed amendment is not proposed to have partial mitigation, and does not comply with subsection (a) of this section; therefore, this section is not applicable.