

## EXHIBIT A

### FINDINGS FOR A-ENGROSSED ORDINANCE NO. 882 AN ORDINANCE AMENDING THE TRANSPORTATION SYSTEM PLAN, AN ELEMENT OF THE COMPREHENSIVE PLAN, RELATING TO AN EXTENSION OF TILE FLAT ROAD

Aug. 2, 2022

Part 1 – General Findings

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#### **Part 1: GENERAL FINDINGS**

A-Engrossed Ordinance No. 882 amends the Washington County Transportation System Plan. This ordinance affects only properties within and adjacent to the Tile Flat Road extension corridor. The Tile Flat Road extension corridor extends from Scholls Ferry Road to connect with Roy Rogers Road at Bull Mountain Road. The Tile Flat Rd extension corridor is outside the Metro Urban Growth Boundary (UGB).

The County Board of Commissioners (Board) finds that the Goals apply to amendments covered by these findings only to the extent noted in specific responses to individual applicable Goals, and that each amendment complies with the Goals. Goals 15 (Willamette River Greenway), 16 (Estuarine Resources), 17 (Coastal Shorelands), 18 (Beaches and Dunes), and 19 (Ocean Resources) and related Oregon Administrative Rules (OAR) are not addressed because these resources are not located within Washington County.

The County is also required to make findings that the amendments are consistent with the requirements of Metro's Urban Growth Management Functional Plan (UGMFP) and Regional Transportation Functional Plan (RTFP). These findings are addressed in this document.

#### **Part 2: STATEWIDE PLANNING GOAL FINDINGS**

The purpose of the findings in this document is to demonstrate that A-Engrossed Ordinance No. 882 is consistent with Statewide Planning Goals (Goals), Oregon Revised Statutes (ORS), Oregon Administrative Rule (OAR) requirements, Metro's Urban Growth Management Functional Plan (UGMFP) and Washington County's Comprehensive Plan (Plan). The County's

Plan was adopted to implement the aforementioned planning documents and was acknowledged by the State of Oregon. The County follows the post-acknowledgement plan amendment (PAPA) process to update the Plan with new state and regional regulations as necessary and relies in part upon these prior state review processes to demonstrate compliance with all necessary requirements.

To the extent A-Engrossed Ordinance No. 882 is not consistent with Statewide Planning Goals, this findings document demonstrates the how A-Engrossed Ordinance No. 882 and the Tile Flat Road extension corridor adopted therein complies with the applicable Goal exception criteria. These findings also consider applicable requirements for an exception from statewide planning goals and demonstrate how the Tile Flat Road extension complies with all applicable exception criteria.

The following precautionary findings are provided to demonstrate ongoing compliance.

**Goal 1 – Citizen Involvement**

Goal 1 addresses Citizen Involvement by requiring the implementation of a comprehensive program to stimulate citizen participation in the planning process. Washington County has an acknowledged citizen involvement program that provides a range of opportunities for citizens and other interested parties to participate in all phases of the planning process. In addition, Chapter X of the County’s Charter sets forth specific requirements for citizen involvement during review and adoption of land use ordinances. Washington County has followed these requirements for the adoption of A-Engrossed Ordinance No. 882.

**Goal 2 – Land Use Planning**

Goal 2 addresses Land Use Planning by requiring an adequate factual base to support a decision as well as coordination with affected governmental entities. Washington County has an acknowledged land use planning process that provides for the review and update of the various elements of the Plan, which includes documents such as the Rural/Natural Resource Plan (RNRP), Comprehensive Framework Plan for the Urban Area (CFP), Community Plans, Community Development Code (CDC) and Transportation System Plan (TSP). Washington County utilized this process to adopt A-Engrossed Ordinance No. 882.

Notice was coordinated with all affected governmental entities and comments received regarding A-Engrossed Ordinance No. 882 were addressed either as part of the proceedings or with subsequent staff coordination.

**Goal 3 – Agricultural Lands**

Goal 3 seeks to preserve and maintain agricultural lands for farm use, consistent with existing and future needs for agricultural products, forest and open space, and with the state's agricultural land use policies. Policy 15, Implementing Strategies (a) and (f), of the RNRP include provisions for the preservation of agricultural lands. As discussed under goal 12, and in part 4,

this findings document demonstrates how the Tile Flat Road extension corridor complies with the applicable exception criteria for Goal 3.

#### **Goal 4 – Forest Lands**

Goal 4 addresses the conservation of forest lands by maintaining the forest land base and protecting the state’s forest economy by making possible economically efficient forest practices. Policy 16, Implementing Strategies (a) and (c) of the RNRP include provisions for the conservation and maintenance of forest lands. As discussed under goal 12, and in part 4, this findings document demonstrates how the Tile Flat Road extension corridor complies with the applicable exception criteria for Goal 4.

#### **Goal 5 – Natural Resources, Scenic and Historic Areas, and Open Spaces**

Goal 5 addresses the protection of natural resources and the conservation of scenic, cultural, and historic areas and open spaces by requiring local programs to protect these resources in order to promote a healthy environment and natural landscape that contributes to Oregon’s livability for present and future generations.

In addition, OAR 660-023-0250 requires application of current Goal 5 provisions to post-acknowledgment plan amendments (PAPAs) when the PAPA 1) creates or amends a resource list or a portion of an acknowledged plan or land use regulation that protects a significant Goal 5 resource, or 2) allows new uses that could be conflicting uses with a particular Goal 5 site.

Policies 10, 11 and 12 of the CFP, Policies 7, 9, 10, 11, 12 and 13 of the RNRP, and various sections of the Community Plans and the CDC include provisions for the protection of Goal 5 resources.

A-Engrossed Ordinance No. 882 does not amend any of the Goal 5 significant designations. A-Engrossed Ordinance No. 882 does not amend other Comprehensive Plan policies or development regulations that would affect existing policies and standards applicable to natural resources.

Article VII of the CDC includes provisions for transportation projects that respond to state and federal permitting requirements, acknowledge the best management practices already employed by the County, including programmatic approaches to improve hydrologic conditions and fish passage and reduce the overall cost of project implementation. Implementation of a roadway project on the TSP would be governed by the requirements of the CDC. As discussed under Goal 12 in parts 4 and 5 below, the TSP Technical Appendix, Tile Flat Road Goal Exception Analysis, addresses how Goal 5 resources were considered during the evaluation of alternatives.

Plan compliance with Goal 5 is maintained with the amendments made by A-Engrossed Ordinance No. 882. The amendments are consistent with the County’s acknowledged policies

and standards for the protection of Goal 5 resources. The amendments made by A-Engrossed Ordinance No. 882 are consistent with the County’s acknowledged policies and standards for the protection of Goal 5 resources as well as those set forth in OAR 660 Division 23.

**Goal 6 – Air, Water and Land Resources Quality**

Goal 6 requires the maintenance and improvement of the quality of the air, water and land resources of the state through the implementation of local plans that address waste and process discharge. Policies 4, 5, 6 and 7 of the CFP and Policies 4, 5, 6, and 7 of the RNRP provide for the maintenance and improvement of the quality of air, water and land resources.

A-Engrossed Ordinance No. 882 does not amend the applicable Plan policies or CDC standards related to air, water or land resources which impact the County’s compliance with Goal 6. A-Engrossed Ordinance No. 882 does not amend any provisions regarding Community Plan and CDC protections to significant wetlands, air quality or land resource quality. Plan compliance with Goal 6 is maintained with the amendments made by A-Engrossed Ordinance No. 882. The amendments are consistent with the county’s acknowledged policies and standards for the protection of Goal 6 resources.

**Goal 7 – Areas Subject to Natural Hazards**

Goal 7 requires the implementation of local land use programs that reduce the risk to people and property from natural hazards such as floods, landslides and earthquakes. Policy 8 of the CFP and Policy 8 of the RNRP set out the County’s policy to protect life and property from natural disasters and hazards.

A-Engrossed Ordinance No. 882 does not amend the applicable Plan policies and strategies or CDC sections related to flood plain areas, or to natural disasters and hazards. Plan compliance with Goal 7 is maintained with the amendments made by A-Engrossed Ordinance No. 882. The amendments are consistent with the County’s acknowledged policies and standards for regulating development exposed to potential natural disasters and hazards addressed by Goal 7.

**Goal 8 – Recreational Needs**

Goal 8 requires local jurisdictions to satisfy the recreational needs of citizens and visitors by planning and providing for the siting of necessary recreational facilities. Policies 17, 33, 34, 35 and 39 of the CFP, Policy 24 of the RNRP and the individual Community Plans address the recreational needs of Washington County’s residents and visitors.

A-Engrossed Ordinance No. 882 does not amend the applicable Plan policies and strategies or CDC sections related to recreational needs. Plan compliance with Goal 8 is maintained with the amendments made by A-Engrossed Ordinance No. 882. The amendments are consistent with the County’s acknowledged policies and strategies for satisfying recreational needs as required by Goal 8.

### **Goal 9 – Economic Development**

Goal 9 requires the provision of adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare and prosperity of citizens. Policy 20 of the CFP and Policies 15, 16, 20 and 21 of the RNRP set out the County’s policies to strengthen the local economy. The CDC contributes to a sound economy by providing standards that facilitate development in an orderly and efficient fashion. Plan compliance with Goal 9 is maintained with the amendments made by A-Engrossed Ordinance No. 882. The amendments are consistent with the County’s acknowledged policies and strategies for strengthening the local economy as required by Goal 9.

### **Goal 10 – Housing**

Goal 10 requires the provision of housing, including adequate numbers of units within a range of prices, types and densities that provide realistic options to meet citizen needs. Policies 21, 22, 23 and 24 of the CFP, and Policies 19, 25 and 26 of the RNRP address the provision of housing in the urban and rural areas of the county. The CDC contributes to the provision of adequate housing by establishing standards that facilitate development in an orderly and efficient fashion.

Plan compliance with Goal 10 is maintained with the amendments made by A-Engrossed Ordinance No. 882.

### **Goal 11 – Public Facilities and Services**

Goal 11 requires a plan for the orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development. Policies 15, 25, 26, 27, 28, 29, 30 and 31 of the CFP, and Policy 22 of the RNRP address the provision of public facilities and services in the urban and rural areas of unincorporated Washington County. The CDC requires that adequate public facilities and services be available for new development. As discussed under Goal 12, and in part 4, this findings document demonstrates how the Tile Flat Road extension corridor complies with the applicable exception criteria for Goal 11.

### **Goal 12 – Transportation**

Findings related to Transportation and the Transportation Planning Rule are discussed below in part 4.

### **Goal 13 – Energy Conservation**

Goal 13 requires developed land uses to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. Policies 35, 36, 37, 38, 39 and 40 of the CFP, and Policy 25 of the RNRP address energy conservation in the urban and rural areas of unincorporated Washington County. The CDC implements the energy conservation policies by establishing standards that promote energy efficient development, especially in Article IV (Development Standards).

Plan compliance with Goal 13 is maintained with the amendments made by A-Engrossed Ordinance No. 882. The amendments are consistent with the County’s acknowledged policies and strategies for promoting energy conservation as required by Goal 13.

**Goal 14 – Urbanization**

Goal 14 requires provisions for the 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. Policies 13, 14, 16, 17, 18, 19, 41 and 42 of the CFP address urbanization within the Regional Urban Growth Boundary. The CDC implements the urbanization policies by establishing standards to promote appropriate urban development. The Community Plans implement the urbanization policies by designating sufficient land for appropriate development. As discussed under goal 12, and in part 4, this finding document demonstrates the how the Tile Flat Road extension corridor complies with the applicable exception criteria for Goal 14.

**Part 3: OREGON HIGHWAY PLAN FINDINGS**

This section addresses the consistency of A-Engrossed Ordinance No. 882 with the applicable policies of the Oregon Highway Plan (OHP). The OHP is an element of the Oregon Transportation Plan. The Board finds that the OHP applies to the amendments covered by these findings only to the extent noted in specific responses to the applicable elements of this plan, and that the amendments comply with the applicable goals and policies of the OHP.

**Applicable OHP policies for a TSP update include:**

**Policy 1A: State Highway Classification System**

A-Engrossed Ordinance No. 882 exhibit 1 updates Washington County’s Functional Classification maps. No new classifications are introduced, and no changes inconsistent with State Highway Classifications have been made. Therefore, the Washington County Transportation System Plan is consistent with the OHP.

**1B, Land Use and Transportation**

A-Engrossed Ordinance No. 882 does not change any land use designations. The adopted and acknowledged Washington County Transportation System Plan addresses mobility standards consistent with State Highway mobility standards. The Washington County Community Development Code addresses access spacing standards and other development related concerns. The adopted and acknowledged Transportation System Plan addresses Active Transportation. Taken together, A-Engrossed Ordinance No. 882, with the adopted and acknowledged Transportation System Plan and the Community Development Code provide a coordinated land use and transportation system consistent with the OHP.

### **1C, State Highway Freight System**

Ordinance No. 768 exhibit 6 established the Economic Vitality goal of the TSP. Exhibit 3 of A-Engrossed Ordinance No. 783 updated the Freight System Element of the TSP, including a revised roadway freight map. These are consistent with the requirements of the OHP and A-Engrossed Ordinance No. 882 does not change these elements of the TSP.

### **1D, Scenic Byways**

No Oregon Scenic Byways are located within Washington County, therefore, A-Engrossed Ordinance No. 882 is consistent with the requirements of the OHP.

### **1F, Highway Mobility Standards**

As described in A-Engrossed Ordinance No. 783, Exhibit 2, the roadway system identified by the Functional Classification and Lane Numbers maps is adequate to meet anticipated travel needs.

Technical Appendix 3 of the TSP includes a Countywide Motor Vehicle Deficiency Evaluation. This evaluation included all ODOT and other facilities within Washington County and assessed the system performance based on the applicable mobility standards, including OHP mobility targets and standards, as well as the Regional Transportation Functional Plan interim mobility deficiency thresholds and operating standards. The potential Deficiency Locations identified in Technical Appendix 3 require additional monitoring and system performance evaluation over time. For such locations, the ultimate decisions regarding the modes, functions, and general locations of solutions and potential development of alternative mobility measures and standards are deferred to future refinement planning to be incorporated into the TSP as updates become available.

SW Roy Rogers Road, SW Scholls Ferry Road, SW 175<sup>th</sup> Avenue were identified in Technical Appendix 3 of the TSP as Motor Vehicle Deficiencies. The severity of these deficiencies was generally rated as either “low” (defined as V/C more than the target) or “medium” (defined as V/C more than 20% above the target). However, some segments of Roy Rogers Road were rated as “high” deficiency severity (defined as V/C more than 50% above target). A-Engrossed Ordinance No. 882 adds a roadway extension to address these deficiencies, in part. Even with the proposed improvements, the roadways in this area are not expected to meet adopted performance targets in the long term and will remain as expected motor vehicle deficiencies within the planning horizon. The TSP provides a plan for a transportation system consistent with the requirements of the OHP and monitoring of highway mobility standards will continue in this area. Compliance with the Oregon Highway Mobility Standards is improved with A-Engrossed Ordinance No. 882.

### **1G, Major Improvements**

A-Engrossed Ordinance No. 768 identified transportation improvement procedures. Article VII of the CDC controls the land use processes necessary when implementing transportation

improvements. Together, these regulations provide a TSP consistent with the requirements of the OHP. A-Engrossed Ordinance No. 882 does not change these requirements.

### **2G, Rail and Highway Compatibility**

A-Engrossed Ordinance 768 Exhibit 5, Objective 2.2 encourages the safe, efficient operation of railroad facilities. A-Engrossed Ordinance No. 882 does not change these requirements or propose any new rail crossings. The adopted and acknowledged TSP is consistent with the requirements of the OHP.

### **3A-E, Access Management**

#### **Policy 3A: Classification and Spacing Standards**

Article V of the CDC controls access spacing standards. A-Engrossed Ordinance No. 882 makes no changes to the requirements associated with interim access locations and therefore is consistent with OHP classification and spacing standards.

### **3B, Medians**

The county TSP does not identify any median locations or treatments. The Washington County Road Design and Construction Standards control the design and placement of medians on County roadways. Washington County Resolution and Order 10-107 adopted the County's Mid-Block Crossing Policy. These previously adopted documents are consistent with the OHP and have not been modified by A-Engrossed Ordinance No. 882.

### **3C, Interchange Access Management Areas**

A-Engrossed Ordinance No. 882 does not make any changes to the previously adopted plan for any interchange area. Therefore, the TSP is consistent with the requirements of the OHP.

### **3D, Deviations**

A-Engrossed Ordinance No. 882 does not make any requests for deviations to state highway standards. Therefore, the TSP is consistent with the requirements of the OHP.

### **4A, Efficiency of Freight Movement**

A-Engrossed Ordinance No. 783, Exhibit 3, adopted a roadway freight system plan consistent with State Highway Freight System designations. A-Engrossed Ordinance No. 882 does not change these designations. Therefore, the TSP is consistent with the requirements of the OHP.

### **4D, Transportation and Demand Management**

A-Engrossed Ordinance No. 768, Exhibit 10, Objective 5.4 and A-Engrossed Ordinance No. 783, Exhibit 5, adopted a TDM policy and system element that is consistent with the requirements of the OHP. A-Engrossed Ordinance No. 882 does not change these elements of the TSP.



#### Part 4: TRANSPORTATION PLANNING RULE FINDINGS

##### Goal 12 – Transportation

**660-012-0010** Provides that transportation planning be divided into two phases, transportation system planning and project development.

**FINDING:** A-Engrossed Ordinance No. 882 amends the Washington County Transportation System Plan consistent with all applicable provisions of Division 12. Exhibit 6 of A-Engrossed Ordinance No. 783, adopted in 2014 described the project prioritization process in the TSP consistent with 660-012-0010. As provided under this subsection, project development is addressed separately under Article VII (Public Transportation Facilities)

**660-012-0015** Includes requirements for preparation and coordination of transportation system plans.

**FINDING:** A-Engrossed Ordinance No. 882 complies with all of the applicable requirements for preparation, coordination and adoption of TSP's required under this section of the TPR.

- A-Engrossed Ordinance No. 882 amends and is incorporated as part of Washington County's Comprehensive Plan.
- As described above, the preparation of A-Engrossed Ordinance No. 882 followed the process in place for the development of A-Engrossed Ordinance No. 768 and was closely coordinated with affected government agencies and service providers.
- OAR 660-012-0015 also requires that regional TSPs, such as Metro's RTP, be coordinated with state transportation plans and policies, such as those found in the Oregon Highway Plan (OHP). Both ODOT and Metro assisted in the development of the plans incorporated into the Washington County TSP. As detailed elsewhere in these findings, A-Engrossed Ordinance No. 882 is consistent with the RTP and the OHP.

**660-012-0016** This section of the TPR describes coordination with federally required transportation plans in metropolitan areas.

**FINDING:** As discussed elsewhere in these findings, A-Engrossed Ordinance No. 882 amends the TSP to establish a Transportation System adequate to meet local needs and provides for an interconnected roadway network to serve future growth. A-Engrossed Ordinance No. 882 provides for changes to a future RTP at a time the proposed improvements are prioritized for funding within the financially constrained network. Washington County has an acknowledged land

use planning process that provides for the review and update of the various elements of the Plan, which includes documents such as the Rural/Natural Resource Plan, Comprehensive Framework Plan for the Urban Area (CFP), Community Plans, Community Development Code (CDC), and Transportation System Plan (TSP). Washington County utilized this process to adopt A-Engrossed Ordinance No. 882. Notice was coordinated with all affected governmental, including Metro, entities and comments received regarding A-Engrossed Ordinance No. 882 were addressed either as part of the proceedings or with subsequent staff coordination and therefore A-Engrossed Ordinance No. 882 is consistent with OAR-660-012-0016.

**660-012-0020** This section of the TPR describes the elements that TSPs must contain.

**FINDING:** A-Engrossed Ordinance No. 882 together with previously adopted and acknowledged Comprehensive Plan and CDC provisions, includes all of the elements required by the TPR, and A-Engrossed Ordinance No. 882 amends the TSP consistent with OAR-660-012-0020.

- A-Engrossed Ordinance No. 882 amends the roadway element of the TSP for Washington County.
- The layout and standards for the spacing and extension of local streets and most neighborhood routes is controlled by Article V of the CDC.
- A-Engrossed Ordinance No. 783 updated the transit element of the TSP through Exhibit 4, which includes all the public transit services described in 660-012-0020(2)(c)(A)-(C). Amendments to the transit element have been made by A-Engrossed Ordinance No. 799 and Ordinance No. 814 consistent with the provisions described in 660-012-0020(2)(c)(A)-(C). A-Engrossed Ordinance No. 882 does not amend the transit element of the TSP.

**660-012-0025** This section of the TPR describes the requirements for Goal compliance and refinement plans.

**FINDING:** A-Engrossed Ordinance No. 882 complies with the applicable provisions of Section 660-012-0025 of the TPR as demonstrated by the following facts.

- A-Engrossed Ordinance No. 882 identifies the need, mode, function and general location for the Tile Flat Road extension corridor and is consistent with OAR 660-012-0025(1).
- Chapter X of the County Charter sets forth specific requirements for citizen involvement during review and adoption of land use ordinances. The county has utilized these requirements for the adoption of A-Engrossed Ordinance No. 882. The findings contained herein satisfy the requirement of OAR 660-12-0025(2) and have been adopted in conjunction with A-Engrossed Ordinance No. 882.

- A-Engrossed Ordinance No. 882 identifies a new refinement area as displayed in Exhibit 1, page 3 of 4. The need for a continued extension of Tile Flat Road has been identified but the decision regarding the general location and alignment has been deferred due to the rural designation of the lands involved.

**660-012-0030** The provisions of this section set forth how needs shall be identified in TSPs.

**FINDING:** Washington County has an acknowledged TSP consistent with the Transportation Planning Rule provisions of 660-012-0030 adopted by A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783 in 2013 and 2014 respectively. A-Engrossed Ordinance No. 882 identifies transportation needs as required by OAR 660-012-0030 as documented within these findings.

- A-Engrossed Ordinance No. 882 responds to transportation system needs identified in the Cooper Mountain Transportation Study and the Urban Reserves Transportation Study. In particular, the need for the movement of goods and services to support ongoing industrial and commercial development as discussed in Goal 9 and envisioned in the Metro Population and Employment Forecast assumptions to 2040. A-Engrossed Ordinance No. 882 is consistent with the OHP and Metro’s RTP and findings of compliance with the OHP and RTP are included herein. In addition, transit services are provided on a countywide basis by TriMet, the regional transit agency. TriMet has adopted the Tri-County Elderly and Disabled Transportation Plan which addresses the needs of the transportation disadvantaged. Based on these factors, A-Engrossed Ordinance No. 882 is consistent with the requirements of OAR 660-012-0030(1).
- A-Engrossed Ordinance No. 882 is not a regional TSP; therefore OAR 660-012-0030(2) is not applicable.
- As prescribed by OAR 660-012-0030(3)(b), the transportation needs assessment included in TSP Technical Appendix, Tile Flat Road Goal Exception Analysis is based upon the Metro 2018 RTP regional travel demand model and mode split assumptions. Many efforts to reduce reliance upon the automobile were considered during the development of A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783, as described below in the findings for OAR 660-012-0045.
- Additionally, alternative modes were considered during the analysis conducted for the Cooper Mountain Transportation Study and the Urban Reserves Transportation Study. Each of these studies has failed to identify a solution that would mitigate the need for, or provide a reasonable alternative to, the Tile Flat Road extension. Additional analysis of alternative modes is presented in the TSP Technical Appendix, Tile Flat Road Goal Exception Analysis.

- A-Engrossed Ordinance No. 882 is consistent with the requirements for Vehicle Miles Traveled (VMT) reduction set forth in OAR 660-012-0035(4) and referenced by OAR 660-012-0030(4). Appropriate findings are provided herein under OAR 660-012-0035.

**660-012-0035** This section concerns how the transportation system alternatives analysis was performed.

**FINDING:** Washington County has an acknowledged TSP consistent with the Transportation Planning Rule provisions of 660-012-0035 adopted by A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783 in 2013 and 2014 respectively. A-Engrossed Ordinance No. 882 includes an alternatives analysis meeting the requirements of OAR 660-012-0035.

- The methodology used for evaluating alternatives is provided in TSP Technical Appendix, Tile Flat Road Goal Exception Analysis. This evaluation includes consideration of the components set forth in OAR 660-012-0035(1)(a)-(e).
- Analysis of system alternatives for A-Engrossed Ordinance No. 882 were based upon the land use factors detailed in OAR 660-012-0035(2)(a)-(d). Specific consideration of these factors is detailed TSP Technical Appendix, Tile Flat Road Goal Exception Analysis. These same land use considerations are required to be implemented in the County's Comprehensive Plan by Metro's Urban Growth Management Functional Plan (UGMFP).
- The level of service standards used to assess the transportation system are consistent with Washington County's adopted and acknowledged TSP, an element of the acknowledged Comprehensive Plan. This analysis is consistent with the requirements of OAR 660-012-0035(3)(a).
- The County's TSP is required to be consistent with Metro's RTP. The RTP implements state and federal standards for protection of air, land and water quality, including the Federal Clean Air Act, and State Water Quality Management Plan (OAR 660-012-0035(3)(b)).
- A-Engrossed Ordinance No. 882 envisions improvements to the transportation system that minimize economic, social, and energy consequences necessary to support and sustain ongoing industrial and commercial development as discussed in Goal 9 and envisioned in the Metro Population and Employment Forecast assumptions to 2040. Adverse environmental consequences will be considered during project development and addressed separately under Article VII (Public Transportation Facilities) of the CDC, which has been previously adopted and acknowledged. This is consistent with the requirements of OAR 660-012-0035(3)(c).
- The transportation system envisioned in A-Engrossed Ordinance No. 882 continues to minimize the conflicts between modes, by providing a

multimodal rural roadway network. The relationship of the various modes within the same right-of-way facilitates connections between the modes as appropriate. This is consistent with the requirements of OAR 660-012-0035(3)(d).

- The transportation system envisioned in A-Engrossed Ordinance No. 882 continues to provide a balanced transportation system not dependent upon any one mode for mobility or accessibility. This is consistent with the requirements of OAR 660-012-0035(3)(e).
- OAR 660-012-0035(4) and (5) concern VMT targets and alternative standards. As a County within a Metropolitan Planning Organization (MPO), Metro’s RTP’s modal targets are applicable to A-Engrossed Ordinance No. 882. The modal targets of the RTP have been established to implement VMT reductions required under the alternative standards provision of OAR 660-012-0035(5). As explained in the findings of compliance with the RTP, A-Engrossed Ordinance No. 882 is consistent with the mode share target A-Engrossed OAR 660-012-0035(5) through (7) concern measuring progress toward meeting non-SOV (single occupancy vehicle) modal targets and establishment of ‘interim benchmarks’ for monitoring the progress toward meeting modal targets/VMT reductions. Metro’s RTP establishes regional targets for non-SOV modes. A-Engrossed Ordinance No. 768 adopted these targets countywide and A-Engrossed Ordinance No. 882 makes no change to these targets.
- OAR 660-012-0035(10) through (12) concern specific types of transportation improvements located in an urban fringe. A-Engrossed Ordinance No. 882 proposes transportation improvements within the urban fringe area. However, the requirements of 660-012-0035(10) specify only certain types of improvements none of which are contemplated by A-Engrossed Ordinance No. 882. Therefore, OAR 660-012-0035(10) through (12) do not apply.

**660-012-0040** This section of the TPR requires that a TSP include a transportation financing program and sets forth what such a program is required to include.

**FINDING:** A-Engrossed Ordinance No. 783 updated the transportation funding element, which augments the funding goals, objectives and strategies adopted by A-Engrossed Ordinance No. 768. Together with the Technical Appendix, these documents create a transportation financing element meeting the standards identified in OAR 660-012-0040. A-Engrossed Ordinance No. 882 does not amend or otherwise impact the funding element of the TSP.

- Exhibit 6 of A-Engrossed Ordinance No. 783 updated the funding element of the Transportation System Plan.

- Exhibit 16 of A-Engrossed Ordinance No. 768 discussed funding goals, objectives, and strategies and includes an overview of existing revenue sources for capital improvements as well as operations and maintenance.
- Project lists and rough cost estimates for roadway, bicycle, and pedestrian system improvements are included in TSP Technical Appendix 2, along with planning level order of magnitude costs, anticipated timing, and an assessment of established revenue sources compared to the identified costs.

**660-012-0045** The provisions of this section concern how a TSP is implemented.

**FINDING:** Washington County has an acknowledged TSP adopted by A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783 in 2013 and 2014 respectively. A-Engrossed Ordinance No. 882, together with previously adopted and acknowledged ordinances fully implements all of the applicable provisions of OAR 660-012-0045.

- OAR 660-012-0045(1) details those transportation facilities, services, and improvements that are exempt from land use review, those that may be permitted outright, and those requiring a land use decision. For those transportation projects requiring a land use decision, the OAR requires that local governments provide a review and approval process that is consistent with OAR 660-012-0050.
- A-Engrossed No. 421 and No. 573 created and refined Article VII of the CDC which is acknowledged to be consistent with the requirements of OAR 660-012-0050. CDC Article VII provides a consolidated review process for review of land use decisions for permitting transportation projects. A-Engrossed Ordinance No. 882 does not amend this process for land use review of transportation projects and is therefore consistent with OAR 660-012-0045(1).
- The CDC, together with Resolution & Order 86-95, provide a process for coordinated review of land use decisions affecting transportation facilities, corridors and sites as well as public notice.
- Article VII (Public Transportation Facilities) of the CDC, which is acknowledged to be consistent with the requirements of OAR 660-012-0050, provides a consolidated review process for land use decisions regarding permitting of transportation projects.
- CDC Article V (Public Facilities and Standards) includes provisions for access control. Article V and the Washington County Road Design and Construction Standards provide for review and protection of roadway safety, infrastructure and operations.
- Local street connectivity standards, as well as the requirements for safe and convenient pedestrian, bicycle and vehicular circulation, have been adopted into the CDC.

- A-Engrossed Ordinance No. 768 provided that plan amendment requests be reviewed for consistency with the applicable provisions of the Transportation Planning Rule (Strategy 9.4.2 – Exhibit 15).
- Exhibit 5 of A-Engrossed Ordinance No. 783 updated the Transportation System Management and Operations Element of the TSP, which includes Transportation Demand Management (TDM). These elements are also included in Article V of the CDC.

**660-012-0050** This section concerns transportation project development.

**FINDING:** Washington County has an acknowledged TSP adopted by A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783 in 2013 and 2014 respectfully, consistent with the Transportation Planning Rule provisions of 660-012-0050. A-Engrossed Ordinance No. 882, together with previously adopted and acknowledged ordinances, fully implements all of the applicable provisions of OAR 660-012-0050.

- CDC Article VII provides a consolidated review process for review of land use decisions for permitting transportation projects; the goals, objectives, and strategies related to the natural environment were updated in Exhibit 8 of A-Engrossed Ordinance No. 768. A-Engrossed Ordinance No. 882 does not amend the current process for land use review of transportation projects.
- Subsections -0050(1) and (2) apply to ODOT and regional TSP's and are not directly applicable to A-Engrossed Ordinance No. 882.
- Subsection -0050(3) concerns project development, land use decision making and unresolved issues of compliance with Comprehensive Plan policies and land use regulations. As previously discussed, adopted and acknowledged Ordinances A-Engrossed No. 421 and No. 573 created and refined Article VII of the CDC which is consistent with the requirements of OAR 660-012-0050. CDC Article VII provides a consolidated review process for review of land use decisions for permitting transportation projects. A-Engrossed Ordinance No. 882 does not amend this process for land use review of transportation projects.
- Subsections -0050(4) through (6) concern preparation of Environmental Impact Statements, the consequences of not building project(s) in the TSP and authorize concurrent project development in conjunction with preparation of a TSP or refinement plan. A-Engrossed Ordinance No. 768 established a TSP consistent with these subsections. A-Engrossed Ordinance No. 882 does not amend this process for Built and Natural Environment Impact review.

**660-012-0055** This section sets forth timelines for adoption of TSPs and for the specific requirements of OAR 660-012-0045(3), (4)(a)-(e) and (5)(d).

**FINDING:** Ordinance No. 882, together with previously adopted and acknowledged ordinances, is consistent with the applicable provisions of OAR 660-012-0055. There are no other provisions in subsection -0055 that are required to be addressed as part of these findings.

**660-012-0060** This section sets forth requirements for plan and land use regulation amendments.

**FINDING:** A-Engrossed Ordinance No. 882 is consistent with the provisions of OAR 660-012-0060.

- A-Engrossed Ordinance No. 882 does not amend any land use designations or regulations.

**660-012-0065** This section identifies the “transportation facilities, services and improvements” that may be permitted on rural lands without a goal exception.

**FINDING:** A-Engrossed Ordinance No. 882 identifies an extension of Tile Flat Road that would not be permissible without a goal exception. Section -0070 findings below in part 5, demonstrate how the Tile Flat Road extension complies with applicable exception criteria and documents the facts and justification for the goal exception. Subsection -0065 is not applicable to A-Engrossed Ordinance No. 882.

#### **Part 5: EXCEPTION FINDINGS FOR THE TILE FLAT ROAD EXTENSION**

As an outcome from the South Cooper Mountain and River Terrace community master planning, the Cooper Mountain Transportation Study and the Urban Reserves Transportation Study; SW Tile Flat Road has been planned to extend approximately 1.4 miles to SW Roy Rogers Road. The Tile Flat Road extension corridor connects between SW Scholls Ferry Road and SW Roy Rogers Road at SW Bull Mountain Road. To make this connection, SW Tile Flat Road must extend across rural lands. These lands have generally been designated as urban reserve; however, part of the extension corridor is on land that has not been designated regarding regional reserves.

Based on the requirements of the Oregon Transportation Planning Rule (TPR), an exception to Statewide Planning Goals is necessary in order to plan for or implement a new road outside of the UGB.

The findings in this document demonstrate how the Tile Flat Road extension complies with applicable exception criteria, which are found in the TPR (OAR 660-012-0070). The applicable OAR provisions are found below, followed by appropriate findings of fact demonstrating compliance with each Administrative Rule requirement.



**660-012-0070**

**Exceptions for Transportation Improvements on Rural Land**

(1) Transportation facilities and improvements which do not meet the requirements of OAR 660-012-0065 require an exception to be sited on rural lands.

(a) A local government approving a proposed exception shall adopt as part of its comprehensive plan findings of fact and a statement of reasons that demonstrate that the standards in this rule have been met. A local government denying a proposed exception shall adopt findings of fact and a statement of reasons explaining why the standards in this rule have not been met. However, findings and reasons denying a proposed exception need not be incorporated into the local comprehensive plan.

**FINDING:** The extension of SW Tile Flat Road from SW Scholls Ferry Road to connect with SW Roy Rogers Road requires that the new road to cross land located outside of the UGB. The new roadway does not meet the requirements of OAR 660-012-0065 and is therefore subject to the requirements of OAR 660-012-0070. This findings document supports the necessary exception and is to be adopted as part of A-Engrossed Ordinance No. 882.

(b) The facts and reasons relied upon to approve or deny a proposed exception shall be supported by substantial evidence in the record of the local exceptions proceeding.

**FINDING:** This document includes the facts and reasons supporting the exception for the Tile Flat Road extension as required by (b), above.

(2) When an exception to Goals 3, 4, 11, or 14 is required to locate a transportation improvement on rural lands, the exception shall be taken pursuant to ORS 197.732(1)(c), Goal 2, and this division. The exceptions standards in OAR chapter 660, division 4 and OAR chapter 660, division 14 shall not apply. Exceptions adopted pursuant to this division shall be deemed to fulfill the requirements for goal exceptions required under ORS 197.732(1)(c) and Goal 2.

**FINDING:** This exception to Goals 3 (Agricultural Lands), 4 (Forest Lands), 11 (Public Facilities and Services) and 14 (Urbanization) is being justified under OAR 660-012-0070; pursuant to subsection (2), above, it is deemed to meet all other applicable requirements by fulfilling the provisions of subsection -0070.

(3) An exception shall, at a minimum, decide need, mode, function and general location for the proposed facility or improvement:

(a) The general location shall be specified as a corridor within which the proposed facility or improvement is to be located, including the outer limits of the proposed location. Specific sites or areas within the corridor may be excluded from the exception to avoid or lessen likely adverse impacts. Where detailed design level information is available, the exception may be specified as a specific alignment.

**FINDING:** This exception is for a new roadway connection that would extend SW Tile Flat Road between SW Scholls Ferry Road and SW Roy Rogers Road. The SW Tile Flat Road extension would be classified as a Collector; SW Scholls Ferry Road is an existing county rural arterial and SW Roy Rogers Road is an existing county arterial that generally serves as the Urban Growth Boundary. A-Engrossed Ordinance No. 882 identifies the need, mode, function, and general location of the Tile Flat Road extension corridor. The general alignment of this roadway is shown to be within a 375-foot-wide corridor in A-Engrossed Ordinance No. 882, Exhibit 1 (Page 2 of 4). Washington County finds this width to be an appropriate balance to allow for an adequate corridor for final design/engineering flexibility while being sufficiently narrow to properly locate, identify and analyze potential impacts to rural lands within the corridor. The collector road extension corridor is approximately 1.4 miles long.

(b) The size, design and capacity of the proposed facility or improvement shall be described generally, but in sufficient detail to allow a general understanding of the likely impacts of the proposed facility or improvement and to justify the amount of land for the proposed transportation facility. Measures limiting the size, design or capacity may be specified in the description of the proposed use in order to simplify the analysis of the effects of the proposed use.

**FINDING:** The extension of SW Tile Flat Road extension corridor across the rural land between SW Scholls Ferry Road and SW Roy Rogers Road will be designed as a two-lane, rural collector roadway that includes a rural bikeway. No other new roadways or connections to the SW Tile Flat Road extension are proposed. Washington County finds the analysis has utilized the County's current rural road standard for the appropriate functional classification justified in the exception and this measure has been appropriately utilized to simplify the analysis of the effect of the facility within the exception corridor, but in a manner that provides for a general understanding of the likely impacts of the proposed improvement. Specifically, the size, design and capacity of the proposed improvement can be summarized as a cross section that will consist of two twelve-foot travel lanes with six-foot-wide, paved shoulders on each side of the roadway to accommodate bicycles.

(c) The adopted exception shall include a process and standards to guide selection of the precise design and location within the corridor and consistent with the general

description of the proposed facility or improvement. For example, where a general location or corridor crosses a river, the exception would specify that a bridge crossing would be built but would defer to project development decisions about precise location and design of the bridge within the selected corridor subject to requirements to minimize impacts on riparian vegetation, habitat values, etc.

**FINDING:** The extension of SW Tile Flat Road across the rural land located between SW Scholls Ferry Road and SW Roy Rogers Road shall be subject to the adopted and acknowledged process for reviewing and approving public transportation projects found in Article VII of the Community Development Code (CDC). Under the adopted CDC (see CDC Section 704-2.1B) provisions, the SW Tile Flat Road extension will meet the definition of a “transportation improvement that has been adopted through an exception to the goal related to agricultural lands and to any other applicable goal with which the facility or improvement does not comply.” CDC Article VII requires an alternative analysis review (CDC Section 707) as well as an assessment of and compliance with standards concerning compatibility with Significant Natural Resources standards and other identified resources and constraints (such as cultural/historic resources, significant habitat, and flood plain). These provisions of CDC Article VII provide for compliance with subsection (c), above, and will guide the precise location and design of the SW Tile Flat Road extension at the project development phase.

(d) Land use regulations implementing the exception may include standards for specific mitigation measures to offset unavoidable environmental, economic, social or energy impacts of the proposed facility or improvement or to assure compatibility with adjacent uses.

**FINDING:** Adopted and acknowledged land use regulations in CDC Article VII that will apply to the SW Tile Flat Road extension include standards to mitigate unavoidable impacts from transportation projects.

(4) To address Goal 2, Part II(c)(1) the exception shall provide reasons justifying why the state policy in the applicable goals should not apply.

**FINDING:** Washington County finds that Goals 3, 4, 11 and 14 should not apply to the SW Tile Flat Road Extension corridor. The following explains the reasons why these goals should not apply to the Tile Flat Road extension:

*Goal 3: To Preserve and Maintain Agricultural Land.*

- Even with an extensive build-out of the urban street network analyzed in the Urban Full Build Alternative, numerous urban and rural road segments are forecast to be over capacity at the end of the planning period. While a variety

of studies have considered the traffic patterns and anticipated system performance, the relevant analysis is provided in the TSP Technical Appendix, Tile Flat Road Goal Exception Analysis. This Technical Appendix displays the analysis of the anticipated future level of service given the 2018 Regional Transportation Plan (RTP) financially constrained network and associated land use forecast for the year 2040. As displayed, the SW Tile Flat Road extension will provide a transportation facility that improves transportation system performance in the area. Thus, not applying Goal 3 to this area will significantly advance the County's and the Region's Goal 12 objectives in the area which is a substantive reason to justify not applying Goal 3 in the SW Tile Flat Road Extension corridor.

- Farming itself is dependent on a rural road network that provides access to markets. In the modern economy, farm products are primarily consumed in urban markets. Many of them are processed in urban areas as well. The existing road network is projected to be over capacity, in every scenario considered, including the 2018 RTP financially constrained scenario. The proposed project is located in an area generally designated as "Urban Reserve" with a smaller segment designated as "Rural Undesignated" area. The Urban Reserves lands have been determined as priority lands for future urban growth boundary expansion. The undesignated lands have not been reserved for urban development at this time, they also have not been set aside for longer-term preservation of farmland as Rural Reserve lands further to the west.
- The Technical Appendix to the TSP Tile Flat Road Goal Exception Analysis displays the traffic improvements the SW Tile Flat Road Exception Corridor is anticipated to provide as compared to the regional mobility standards. Thus, not applying Goal 3 to this area will advance the County's overall Goal 3 objectives in the broader Tualatin River Valley agricultural area by reducing the amount of traffic congestion.
- Other evaluations of the corridor provide similar results and all of which demonstrate the SW Tile Flat Road Extension Corridor would reduce "spillover" of urban traffic into the Scholls Sherwood Road farming area and allow more urban traffic to circulate nearer to the urban and urbanizing areas to the west which is a substantive reason to justify not applying Goal 3 in the SW Tile Flat Road extension corridor.

*Goal 4: 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.*

The subject land is inventoried as agricultural land, not forest land, in the Comprehensive Plan and forest use is not the primary land use in the transportation improvement corridor. However, Washington County observes that many agricultural areas in the County are also capable of producing commercial tree species. Accordingly, the County concludes that including a Goal Exception to Goal 4 is a prudent measure and further observes that the reasons are similar to those provided for the Exception to Goal 3. The analysis in the Tile Flat Road Extension Goal Exception document (TSP Technical Appendix), provides the following reasons why Goal 4 should not be applied in the Tile Flat Road Extension corridor.

- Even with an extensive build-out of the urban street network analyzed in the Urban Full Build Alternative, numerous urban and rural road segments are forecast to be over capacity at the end of the planning period. While a variety of studies have considered the traffic patterns and anticipated system performance, the relevant analysis is provided for in the TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis. This appendix displays the analysis of the anticipated level of service given the 2018 Regional Transportation Plan (RTP) financially constrained network and the associated land use forecast for the year 2040. As displayed the Tile Flat Road extension will provide a transportation facility that improves transportation system performance in the area. Thus, not applying Goal 4 to this area will significantly advance the County's and the Region's Goal 12 objectives in the area which is a substantive reason to justify not applying Goal 4 in the Tile Flat Road Extension corridor.
- Forestry itself is dependent on a rural road network that provides access to markets. In the modern economy, forest products are primarily consumed in urban markets. Many of them are processed in urban areas as well. The existing road network is projected to be over capacity, in every scenario considered, including the 2018 RTP financially constrained scenario. The proposed project is located in an area generally designated as "Urban Reserve" with a smaller segment designated as "Rural Undesignated" area. The Urban Reserves lands have been determined as priority lands for urban growth boundary expansion. The undesignated lands have not been reserved for urban development at this time, they also have not been set aside for longer-term preservation of forest land as Rural Reserve lands further to the west.
- The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis displays the traffic improvements the SW Tile Flat Road Exception Corridor is anticipated to provide as compared to the regional mobility standards. Thus, not applying Goal 4 to this area will advance the County's overall Goal 4

objectives in the broader Tualatin River Valley agricultural and forest areas by reducing the amount of traffic congestion.

- Other evaluations of the corridor provide similar results and all of which demonstrate the SW Tile Flat Road Extension Corridor would reduce “spillover” of urban traffic into the Scholls Sherwood Road farming area and allow more urban traffic to circulate nearer to the urban and urbanizing areas to the west which is a substantive reason to justify not applying Goal 4 in the SW Tile Flat Road Extension corridor.

*Goal 11: 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*

Oregon Planning Goal 11, Public Facilities and Services, requires all County’s to adopt a Public Facility Plan (PFP) for transportation. OAR 660-012-0000(4) notes in part: “Transportation system plans adopted pursuant to this division fulfill the requirements for public facilities required under ORS 197.712(2)(e), Goal 11 and OAR chapter 660, division 11, as they relate to transportation facilities.”

Therefore, Washington County observes that the need for a Goal 11 exception for the type of transportation corridor proposed herein may be unnecessary, and if it is necessary at all, is limited. Goal 11 primarily concerns public facilities planning requirements. However, it also includes specific restrictions on public facility planning for key urban facilities in rural areas. The listed key urban facilities in Goal 11 does not include transportation facilities. Transportation facilities serve both urban and rural needs in both urban and rural areas. Goal 11 does, however, have an underlying policy theme which is to undertake public facility planning in a manner that does not induce urbanization of rural areas. Washington County concludes that this policy objective is congruent with the policy objectives set forth in Goal 14, and accordingly, herewith incorporates and adopts the reasons explaining why Goal 14 should not apply herein below as its basis to explain why Statewide Planning Goal 11 should not be applied to the subject corridor, to the extent a Goal 11 exception is necessary in any event.

*Goal 14: 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*

Washington County finds that the west and southwest portion of the Metro UGB is being urbanized and the cities in those areas such as Hillsboro, Tualatin and Beaverton are experiencing population and employment growth. Washington

County concludes Goal 14 requires the County to plan for current and future growth consistent with the Metro Plans for the UGB and the Washington County plans outside the UGB. Washington County also concludes it has responsibility under Goal 14 to maintain the rural areas of the County outside the UGB. Washington County concludes these obligations under Goal 14 conflict to a certain extent in urbanizing areas planned for growth and adjacent rural areas impacted by such growth.

Washington County finds that transportation planning is quite different than planning for land development and underground infrastructure like sewer and water where relatively clear distinctions between “urban land use” and “rural land use” can be made. Transportation is a fluid dynamic phenomenon with urban and rural travelers making individualized choices within the system. Thus, Washington County finds that Goal 14 requires, in the context of transportation, not a complete segregation of urban and rural activities, but a management of rural and urban transportation dynamics to focus urban intensity transportation in urban areas. Washington County recognizes that intensive urban transportation patterns will seek the quickest trip solutions which can and will “spillover” onto the rural roadway system where the rural system represents the quickest trip solution. As such, Washington County, in cooperation with Metro, has modelled future transportation patterns throughout the Study Area and the analysis presented in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis estimates future traffic flows in the area.

Washington County finds the analysis of the existing and planned system in the area demonstrates that extension of Tile Flat Road is an appropriate balance of the County’s two fundamental Goal 14 responsibilities. The County, and its regional partners, have planned extensive improvements to the urban transportation system and the analysis reflects this urban transportation system improvement planning. These extensive improvements will work to capture urban traffic patterns on the urban system. These urban improvements do not provide for a complete interconnected transportation network necessary to serve the developing areas without considering adjacent rural lands.

The proposed project is located in an area generally designated as “Urban Reserve” with a smaller segment designated as “Rural Undesignated” area. The Urban Reserve lands have been determined as priority lands for future urban growth boundary expansion. The undesignated lands have not been reserved for urban development at this time, they also have not been set aside for longer-term preservation of rural lands as Rural Reserve lands further to the

west.

As such, Washington County finds that, on a regional scale, the proposed project is consistent with Goal 14 to provide for an orderly and efficient transition from rural to urban land use. Achieving this Goal 14 balance on a regional scale will result in a new roadway on rural land that is near urbanizing lands but is not yet within the UGB. Urban traffic patterns will shift and utilize the new roadway as the quickest trip solution for some origins and destinations in this growing area. Thus, the localized Goal 14 effect requiring the Goal Exception for the extension of Tile Flat Road are justified because the project will allow regional urban traffic patterns to circulate nearer to the urban and urbanizing areas within the UGB which is a substantive reason to justify not applying Goal 14 in the Tile Flat Road Extension corridor.

((4) continued) Further, the exception shall demonstrate that there is a transportation need identified consistent with the requirements of OAR 660-012-0030 which cannot reasonably be accommodated through one or a combination of the following measures not requiring an exception:

**FINDING:** Washington County finds that the identified needs are based upon the County's TSP adopted in conformance with OAR 660-012-0030 and that the subject goal exception amends the TSP to add the SW Tile Flat Road extension corridor as a planned transportation improvement consistent with the requirements of this rule.

- (a) Alternative modes of transportation;
- (b) Traffic management measures; and
- (c) Improvements to existing transportation facilities.

**FINDING:** The extension of Tile Road across the rural land between SW Scholls Ferry Road and SW Roy Rogers Road will provide logical and appropriate connectivity for all transportation modes. While alternative modes can (and will be provided for on the SW Tile Flat Road extension) reduce automotive travel demand, they cannot fulfill the needs for connectivity and mobility that the SW Tile Flat Road extension would provide.

The following characteristics of SW Tile Flat Road are consistent with those described in Technical Appendix the Washington County Transportation System Plan:

- The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis displays the traffic improvements the SW Tile Flat Road Exception Corridor is anticipated to provide as compared to the regional mobility standards. The



analysis shows the SW Tile Flat Road Extension is needed even when the analysis accounts for extensive urban transit and street upgrades throughout the area consistent with the 2018 RTP.

- The SW Tile Flat Road extension is expected to carry approximately 18,200 to 22,750 vehicles per day by year 2040. This is consistent with the upper end of collector traffic volumes. These vehicle trips are expected with and without the SW Tile Flat Road extension.
- Regional traffic on arterials and collectors is not well suited to targeted traffic management measures that could address the identified transportation needs.
- Transit services consistent with the 2018 RTP financially constrained network were assumed in the traffic analysis present in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis. Significant additional transit service to and through this area is assumed. Additional transit services may not be financially feasible and would not be consistent with the financially constrained RTP (an RTFP requirement). Appropriate and reasonable transit services assumptions would not address the traffic needs anticipated.
- Given the scale of regional traffic in the area Washington County finds that the transportation need for the Tile Flat Road Extension is explained in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis.

In summary, Washington County finds that the transportation need for the SW Tile Flat Road Extension is explained in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis. The identified transportation need is sufficient reason to justify an exception to Goals 3, 4, 11, and 14 and provided herein by ordinance amending the Washington County Comprehensive Plan.

(5) To address Goal 2, Part II(c)(2) the exception shall demonstrate that non-exception locations cannot reasonably accommodate the proposed transportation improvement or facility. The exception shall set forth the facts and assumptions used as the basis for determining why the use requires a location on resource land subject to Goals 3 or 4.

**FINDING:** As an initial geographic matter, Washington County finds based upon the maps in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis that there are no available alternative routes to the west through lands that would not require an exception to Goals 3 or 4. Accordingly, Washington County finds that the only available non-exception locations to accommodate the need could only be achieved through improvements within the Metro UGB. Washington County here within incorporates the analysis presented in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis, and concludes based thereupon, that alternative improvements within the UGB cannot reasonably accommodate the transportation need.

The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis details how additional alternatives were considered and specifically why further road widening east of SW Roy Rogers Road is of limited benefit because so many origins and destinations are on a south to northwest alignment that even more extensive improvements to the east are not adequately to serve future travel demand. Washington County examined the ability of the entire urban system to be expanded to reduce regional traffic “spillover” outside the UGB to such a degree the need for the Tile Flat Road Extension would be eliminated. The analysis demonstrates even under the full urban build alternative, which arguably includes improvements and measures that stretch the bounds of reasonable transportation planning, these improvements are still not adequate to meet the identified transportation needs without an exception.

(6) To determine the reasonableness of alternatives to an exception under sections (4) and (5) of this rule, cost, operational feasibility, economic dislocation and other relevant factors shall be addressed. The thresholds chosen to judge whether an alternative method or location cannot reasonably accommodate the proposed transportation need or facility must be justified in the exception.

- FINDING:** Washington County finds the following performance thresholds are applicable:
- Transportation facility performance thresholds for Washington County facilities, ODOT facilities, and municipalities are based on existing adopted performance standards consistent with the 2018 RTP mobility standards as documented in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis.
  - All the roads and projects evaluated are surface roads. Standard intersections, with or without traffic signals, or roundabouts can be implemented to address facility operations at the road connection points in accordance with MUTCD standards. New road segments or widening can be handled with standard striping in a manner that follows AASHTO design guidelines. For these reasons, Washington County determines that specific operational feasibility thresholds are not necessary or appropriate for the subject Goal Exception Analysis.
  - Washington County does not have categorical cost threshold measures or policies adopted, and cost and constructability thresholds are applied on a project basis to avoid inordinate costs. Cost and constructability issues are considered in relation to specific projects and community needs. Road alignments seek to avoid sensitive environmental areas, especially riparian corridors and wetland areas, where costs are typically twice, or more, of the typical construction costs. Washington County also seeks road alignments

that avoid areas of shallow depth to solid bedrock where expensive blasting and excavation is required.

- Economic Dislocation is the term utilized in OAR 660-012-0070 to evaluate and describe impacts to neighborhoods and private property from new transportation facilities, and especially improvements such as road widening or new roads that require the acquisition of right-of-way from private owners. Washington County finds that advance planning for needed infrastructure to serve future growth limits economic dislocation. Washington County determines that economic dislocation thresholds are appropriate to apply in the following manner:
  - Widening of urban streets or new streets within built-up areas of a city or developed urban areas of the County is not appropriate beyond those projects that are identified by the County TSP.
  - In urbanizing areas any planned new streets or any planned street widening improvements for the area will not cause unacceptable levels of economic dislocation. Additional widening or new streets beyond the planned improvements may cause unacceptable levels of economic dislocation and the potential impacts are examined on a case-by-case basis as part of the alternative's analysis.

(a) In addressing sections (4) and (5) of this rule, the exception shall identify and address alternative methods and locations that are potentially reasonable to accommodate the identified transportation need.

**FINDING:** The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis details how additional alternatives were considered.

(b) Detailed evaluation of such alternatives is not required when an alternative does not meet an identified threshold.

**FINDING:** The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis details how additional alternatives were considered. Washington County concludes that the document identifies and addresses the potentially reasonable alternative methods and locations to accommodate the identified transportation need. The analysis of the alternatives was based, in part, on the performance standards as described in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis. These findings can be summarized as:

- An alternative extending 190<sup>th</sup> Avenue through Cooper Mountain Nature Park did not satisfy the Goal 5 Resource avoidance threshold as it would create significant negative impacts to a site inventoried by Metro as a Goal 5 resource and it would not satisfy the functional classification threshold

because it would cause arterial level volumes of traffic on a collector street, which is not consistent with adopted functional classification.

- An alternative widening 175<sup>th</sup> to 5+ lanes would not satisfy the economic dislocation threshold or constructability threshold. This alternative would require widening from SW Farmington Road to SW Scholls Ferry Road in order to provide real transportation benefits, which would result in the complete taking of multiple properties, the destruction of housing, and would be very challenging to construct given the grades and topography.
- An alternative widening SW Grabhorn Road to 5+ lanes would not satisfy the economic dislocation and Goal 5 resource avoidance thresholds. This alternative would require widening from SW Tile Flat Road to SW Farmington Road in order to provide real transportation benefits, which results in the taking of multiple residences. It would also have negative impacts on a Goal 5 historic resource property by requiring part of the property for expanded right of way.
- Widening of the planned River Terrace and other roads further to the east is of little benefit (even if feasible which it may not be) because so many origins and destinations are on a south to northwest alignment that even more extensive improvements to the east are not adequately aligned with future travel demand flows anticipated in the 2018 RTP.

(7) To address Goal 2, Part II(c)(3), the exception shall:

(a) Compare the long-term economic, social, environmental and energy consequences of the proposed location and other alternative locations requiring exceptions. The exception shall describe the characteristics of each alternative location considered by the jurisdiction for which an exception might be taken, the typical advantages and disadvantages of using the location for the proposed transportation facility or improvement, and the typical positive and negative consequences resulting from the transportation facility or improvement at the proposed location with measures designed to reduce adverse impacts.

**FINDING:** The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis, section 5, details appropriate consideration of the long-term economic, social, environmental and energy (ESEE) consequences associated with the SW Tile Flat Road extension. Washington County finds the pertinent rural land characteristics of the alternative locations are set forth in Section 5.3. Washington County further finds that the ESEE analysis in Section 5.4 evaluated the reasonable alternatives to the proposed corridor that would also require an exception and identified the typical advantages and disadvantages. The three alternatives considered are compared to each other and the positive and negative ESEE consequences are further refined through the consideration of measures

designed to reduce adverse impacts in Sections 5.6 and 5.7 above. A summary of the ESEE analysis follows:

- Alternative A is the shortest alternative that ends with a connection to SW Bull Mountain Road. It provides fewer positive economic and energy impacts than the preferred alternative, while having fewer negative social and environmental impacts.
- Alternative B follows the exact same alignment as Alternative C, but would advance the entire corridor at the same time. Alternative B has slightly fewer positive economic and energy impacts than Alternative C, while having the same negative social impacts and environmental impacts.
- Alternative C has slightly more positive economic and energy impacts, while also having the same negative social and environmental impacts as Alternative B.
- Both Alternatives B and C have greater negative social and environmental impacts than Alternative A.

(b) Determine whether the net adverse impacts associated with the proposed exception site, with mitigation measures designed to reduce adverse impacts, are significantly more adverse than the net impacts from other locations which would also require an exception. A proposed exception location would fail to meet this requirement only if the affected local government concludes that the impacts associated with it are significantly more adverse than the other identified exception sites. The exception shall include the reasons why the consequences of the needed transportation facility or improvement at the proposed exception location are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed location. Where the proposed goal exception location is on resource lands subject to Goals 3 or 4, the exception shall include the facts used to determine which resource land is least productive; the ability to sustain resource uses near the proposed use; and the long-term economic impact on the general area caused by irreversible removal of the land from the resource base; and

**FINDING:** The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis, section 5.7, considers the net adverse ESEE impacts with targeted mitigation. Alternative C has the least adverse ESEE consequences. These are summarized as follows:

- Economic: The net adverse economic consequences caused by congestion and reduced connectivity are higher for Alternatives A. Alternative B does not have the additional positives potentially introduced by the regulatory juncture to potentially allow farming to continue, that said, this introduces uncertainty for farmers in the area that may discourage long-term farm investments.

- **Social:** The net consequences of an indirect route for road system users are neutral, or at least not significantly more adverse, with mitigation of the localized social consequences caused by bifurcated farm units.
- **Environmental:** The net consequences of environmental impacts from increased out-of-direction travel and additional congestion offset, to some degree the additional riparian crossing impacts of Alternative B and Alternative C when compared to alternative A. However, Alternative A is still slightly positive from an environmental consequences standpoint.
- **Energy:** The net adverse energy consequences caused by congestion and out-of-direction travel are higher for Alternative A while Alternative B does not have the additional potential benefits introduced by the Project Development regulatory juncture. Alternative C is expected to be slightly positive from an energy standpoint when compared to the other two alternatives.

Washington County further concludes that the ESEE analysis in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis includes and is based upon a determination of facts with respect to agricultural productivity, ability to sustain resource uses near the proposed use, and long-term economic impact on the agricultural resource base set forth in Sections 4.3 and Section 5, together with associated underlying data and appendices concerning farm uses, farm practices, soils and related agricultural considerations.

(c) The evaluation of the consequences of general locations or corridors need not be site-specific but may be generalized consistent with the requirements of section (3) of this rule. Detailed evaluation of specific alternative locations identified by parties during the local exceptions proceeding is not required unless such locations are specifically described with facts to support the assertion that the locations have significantly fewer net adverse economic, social, environmental and energy impacts than the proposed exception location.

**FINDING:** Consistent with the above, Washington County concludes that the ESEE analysis presented in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis includes and is based upon a determination of facts with respect to agricultural productivity, ability to sustain resource uses near the proposed use, and long-term economic impact on the agricultural resource base. The ESEE analysis set forth in the TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis concerns farm uses, farm practices, soils and related agricultural considerations. Washington County concludes that the impacts associated with the exception are less adverse than other reasonably practicable solutions, summarized as follows:

- The location of alternatives which required an exception was limited by the extent of lands classified as Rural Reserves, which are not allowed to have a

goal exception for a new roadway alignment(s), thus limiting potential exceptions to lands designated as Urban Reserve or undesignated.

- Alternatives needed to benefit future north-south travel demand on SW Roy Rogers Road and other facilities consistent with the 2018 RTP and provide for future connectivity to developing communities.
- Two Alternatives were developed using the generalized parameters described, Alternative A which is the shortest alternative and follows approximately 50% of Alternative B but stops at the connection to SW Bull Mountain Road. Alternative B extends all the way to SW Beef Bend Road. A third alternative, Alternative C is the same corridor location as Alternative B but adds a delayed construction of the southern half of Alternative B based upon future traffic conditions.

Washington County finds that, to the extent the alternatives and associated consequences analysis was generalized in Section 5 above, the generalization was conservative to assure the analysis set forth sufficient consideration to adequately address localized issues.

(8) To address Goal 2, Part II(c)(4), the exception shall:

(a) Describe the adverse effects that the proposed transportation improvement is likely to have on the surrounding rural lands and land uses, including increased traffic and pressure for nonfarm or highway-oriented development on areas made more accessible by the transportation improvement.

**FINDING:** Potential adverse affects of the proposed SW Tile Flat Road extension are set forth in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis. The analysis describes potential adverse effects that the SW Tile Flat Extension is likely to have on surrounding rural land and land uses including increased traffic and consideration of non-farm or highway oriented development in the area of the extension. The adverse effects from the proposed transportation improvement are summarized as follows:

- Direct loss of land for farming, as some farmland will be purchased for public right of way.
- Bifurcated lands, especially for Alternatives B and C as those proposed corridors will divide two large farms and one medium-sized farm.
- Additional loss of farmable land via direct buffers required beyond the public right of way, which are needed to accommodate new farm infrastructure such as perimeter farm access roads for equipment that must be expanded or changed due to bifurcation.

- Additional indirect buffer beyond the right of way from the proposed transportation use, such as distance from noise, emissions, vibration, drainage, trespass and potential litter.

(b) Demonstrate how the proposed transportation improvement is compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts. Compatible is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses; and

**FINDING:** The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis, section 6, describes how the SW Tile Flat Road Extension can be compatible with adjacent uses with the implementation of measures designed to reduce adverse impacts as set forth in Section 6.1.4. A summary of potential impact mitigation measures follows:

- Locate the required right-of-way along property boundaries to minimize bifurcation of farms, to the extent practicable.
- Construct a Farm Access Road when bifurcation is required, in order to facilitate movement of farm equipment.
- Facilitate exchange of properties where bifurcation occurs, to create cohesive managed farm units.
- Engineer storm detention and retention facilities to minimize runoff.

(c) Adopt as part of the exception, facility design and land use measures which minimize accessibility of rural lands from the proposed transportation facility or improvement and support continued rural use of surrounding lands.

**FINDING:** No changes in the rural land use plan designations (EFU and AF-20) of the surrounding properties is proposed or authorized by the SW Tile Flat Road extension exception. New access shall only be permitted for uses that are authorized under the applicable Plan designation. No additional design and/or land use measures are therefore required to be adopted to maintain the continued rural use of surrounding properties.

(9)(a) Exceptions taken pursuant to this rule shall indicate on a map or otherwise the locations of the proposed transportation facility or improvement and of alternatives identified under subsection (4)(c), sections (5) and (7) of this rule.

**FINDING:** Exhibit 1 (Page 2 of 4) of A-Engrossed Ordinance No. 882 is a map that identifies the location of the proposed Tile Flat Road extension corridor as required by Subsection (9)(a).



(b) Each notice of a public hearing on a proposed exception shall specifically note that a goal exception is proposed and shall summarize the issues in an understandable manner.

**FINDING:** This exception was noticed as required above. Notice of the exception was provided to Metro on Oct. 26, 2021 and was included in the Oct. 26, 2021 notice to DLCD for Ordinance No. 882. Additionally, the notice to interested parties and notice to public agencies both included reference to the proposed exception; these notices were sent on Oct. 27, 2021. Lastly, the Individual and General Notice (No. 2021-07) was mailed Oct. 27, 2021 and also included reference to the proposed exception.

(10) An exception taken pursuant to this rule does not authorize uses other than the transportation facilities or improvements justified in the exception.

**FINDING:** No other uses besides the SW Tile Flat Road extension are proposed or intended by this exception.

(a) Modifications to unconstructed transportation facilities or improvements authorized in an exception shall not require a new exception if the modification is located entirely within the corridor approved in the exception.

**FINDING:** Subsection (a) does not require a finding.

(b) Modifications to constructed transportation facilities authorized in an exception shall require a new exception, unless the modification is permitted without an exception under OAR 660-012-0065(3)(b)-(f). For purposes of this rule, minor transportation improvements made to a transportation facility or improvement authorized in an exception shall not be considered a modification to a transportation facility or improvement and shall not require a new exception.

**FINDING:** Washington County is required to comply with the above as a matter of law.

(c) Notwithstanding subsections (a) and (b) of this section, the following modifications to transportation facilities or improvements authorized in an exception shall require new goal exceptions:

(A) New intersections or new interchanges on limited access highways or expressways, excluding replacement of an existing intersection with an interchange.

(B) New approach roads located within the influence area of an interchange.

(C) Modifications that change the functional classification of the transportation facility.

(D) Modifications that materially reduce the effectiveness of facility design measures or land use measures adopted pursuant to subsection (8)(c) of this rule to minimize accessibility to

rural lands or support continued rural use of surrounding rural lands, unless the area subject to the modification has subsequently been relocated inside an urban growth boundary.

**FINDING:** The above limitations are recognized as a matter of law. Washington County will comply with the above requirements.

## **Part 6: URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN FINDINGS**

This section addresses the consistency of Ordinance No 882 with the applicable policies of Metro’s Regional Transportation Plan (RTP). The Board finds that the RTP applies to the amendments covered by these findings only to the extent noted in specific responses to the applicable elements of this plans, as provided below, and that the amendments comply with the applicable goals and policies of the RTP.

### **Title 8 – Compliance Procedures**

Title 8 sets forth Metro’s procedures for determining compliance with the UGMFP. Included in this title are steps local jurisdictions must take to ensure that Metro has the opportunity to review amendments to comprehensive plans. Title 8 requires jurisdictions to submit notice to Metro at least 35 days prior to the first evidentiary hearing for a proposed amendment to a comprehensive plan.

#### **RESPONSE**

Consistent with Title 8, a copy of proposed A-Engrossed Ordinance No. 882 was sent date to Metro on Oct. 26, 2021, 36 days prior to the first evidentiary hearing. A copy of A-Engrossed Ordinance No. 882 was sent to Metro on date. Metro provided no comments on A-Engrossed Ordinance No. 882.

## **Part 7: REGIONAL TRANSPORTATION PLAN FINDINGS**

This section addresses the consistency of A-Engrossed Ordinance No. 882 with the applicable policies of Metro’s Regional Transportation Plan (RTP). The Board finds that the RTP applies to the amendments covered by these findings only to the extent noted in specific responses to the applicable elements of this plan, as provided below, and that the amendments comply with the applicable goals and policies of the RTP.

A-Engrossed Ordinance No. 882 amends the County’s Transportation System Plan (TSP) consistent with the Regional Transportation Plan (RTP) and Title 2 “Development and Update of Transportation System Plans” of the Regional Transportation Functional Plan (RTFP) Sections 210, 220 and 230.

A-Engrossed Ordinance No. 882 amends the existing adopted and acknowledged TSP to provide updates to the roadway element. The transportation system designations adopted in A-Engrossed Ordinance No. 882 are consistent with the designations identified in Metro’s 2018 RTP. As described in the Goal 12 findings above, the TSP maps as amended A-Engrossed Ordinance No. 882 continue to provide a system of transportation facilities and services adequate to meet identified transportation needs consistent with the RTP. Brief summaries of the applicable RTFP provisions and findings of compliance follow.

**Title 1** This section identifies the requirements for Transportation System Design, including provisions for complete streets, the transit system, pedestrian system, bicycle system, freight system and system management and operations.

**FINDING:** The Washington County Road Design & Construction Standards, together with A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783, provide for a transportation system design consistent with all the requirements of Title 1. A-Engrossed Ordinance No. 882 makes no adjustment to Street System Design, Bicycle System Design, Freight System Design or Transportation System Management and Operations and therefore these sections continue to be consistent with the Regional Transportation Functional Plan.

**Title 2** This section identifies the process for developing a TSP within or affecting the Metro region. Provisions include identification of transportation system performance, needs and solutions.

**3.08.210** This section contains provisions regarding the assessment of transportation needs.

**FINDING:** A-Engrossed Ordinance No. 882, as well as previously adopted and acknowledged ordinances, is consistent with the provisions.

- A-Engrossed Ordinance No. 882 is intended to address a system deficiency. The system deficiencies were identified in the technical appendix 3 to the TSP adopted concurrent with A-Engrossed Ordinance No. 783 in 2014. Ongoing continuous, cooperative, and comprehensive refinement planning has explored opportunities to address the list of existing and future deficiencies identified.
- Facilities anticipated to exceed deficiency thresholds and operating standards were identified in the technical appendix 3 to the TSP adopted concurrent with A-Engrossed Ordinance No. 783 in 2014.
- A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783, provide for a transportation system design consistent with all the requirements of RTFP. Objective 3.5 of the Washington County TSP specifically calls out the need for equitable distribution of impacts and benefits and consideration of environmental justice populations.
- As presented in the TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis, a transportation analysis applied the regional population and employment forecast consistent with the 2018 RTP. Washington County has also coordinated a number of other studies considering various land use scenarios that could occur given the urban and rural reserves and potential UGB expansion in Western Washington County.

- A-Engrossed Ordinance No. 882 amends the previously adopted and acknowledged TSP that provides for a complete set of system maps and addresses regional non-SOV modal targets.
- A-Engrossed Ordinance No. 882 adopts a component of the outcome from the Cooper Mountain Transportation Study identified in subsection 8.2.1.1 of the 2018 RTP on page 8-6.
- The Tile Flat Road Extension corridor is shown as “Potential New Connection D” in figure 8.2 on page 8-7 of the 2018 RTP.
- A-Engrossed Ordinance No. 882 considers lands outside of the mobility corridors identified in the 2018 RTP. The closest mobility corridor would be #12 Beaverton-Tigard corridor.

**3.08.220** This section contains provisions regarding the selection of transportation solutions.

- FINDING:** A-Engrossed Ordinance No. 882, as well as previously adopted and acknowledged TSP ordinances, is consistent with the provisions.
- Consideration of A-Engrossed Ordinance No. 882 followed the steps provided in subsection A as well as in the Washington County TSP Strategy 5.1.4 and the TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis. This process and provide for consideration of the needed multimodal connectivity and motor vehicle capacity consistent with the requirements for determining transportation needs as described above under section 3.08.210.
  - A-Engrossed Ordinance No. 882 identifies a planned multimodal collector improvement and establishes a long-term multimodal corridor to serve the developing communities in the area. The multimodal corridor identified serves to improve the connectivity of the community and provide a connected grid of parallel roadways that include pedestrian and bicycle facilities consistent with the standards of the RTP.
  - The connectivity of a community cannot be addressed by operational solutions, transit, bicycle and pedestrian system improvements, traffic management or calming techniques or by land use strategies. The planned arterial corridor would serve to enhance the bicycle and pedestrian system connectivity and provide an opportunity for eventual transit service.
  - Consideration of inclusion of the Tile Flat Road extension into the RTP will occur during an appropriate future update process for a future RTP.

**3.08.230** This section pertains to performance targets and standards.

- FINDING:** A-Engrossed Ordinance No. 882, as well as previously adopted and acknowledged TSP ordinances, is consistent with the provisions.

- A-Engrossed Ordinance No. 768, Exhibit 10 identified interim performance targets and standards consistent with the RTFP. Washington County has not adopted alternative targets and has not applied mobility standards different from those identified in the RTFP.
- Technical Appendix 3 to A-Engrossed Ordinance No. 783 identified and calculated system performance measures consistent with the requirements of the RTFP. These measures were utilized to inform the planning processes necessary to develop A-Engrossed Ordinance No. 882.
- A-Engrossed Ordinance No. 882 is consistent with the throughway network as expressed in figures 3.11 and 3.12 of the 2018 RTP
- A-Engrossed Ordinance No. 882 will not result in motor vehicle capacity improvements that go beyond the throughway network defined in figure 3.3 of the 2018 RTP.
- A-Engrossed Ordinance No. 882 does not propose any alternative targets or standards.
- The determination of need and assessment of solutions as shown in The TSP Technical Appendix Tile Flat Road Extension Goal Exception Analysis was based on the land use and system networks assumptions consistent with the travel demand forecasts associated with the 2018 RTP. The analysis utilized the performance targets and standards consistent with the 2018 RTP.
- A-Engrossed Ordinance No. 882 amends the TSP previously adopted and acknowledged TSP (adopted by A-Engrossed Ordinance No. 768 and A-Engrossed Ordinance No. 783, as amended). The amendments in A-Engrossed Ordinance No. 882 are consistent with the County's acknowledged policies, goals and strategies for the provision of transportation facilities and services. The County TSP includes performance measures consistent with the requirements of the RTFP. A-Engrossed Ordinance No. 882 does amend these performance measures.

A-Engrossed Ordinance No. 882, as well as previously adopted and acknowledged TSP, is consistent with all of the provisions of the Regional Transportation Functional Plan.