# MEMORANDUM

DATE:	May 23, 2023
TO:	Canby TSP Project Management Team
FROM:	3J Consulting
SUBJECT:	Canby Transportation System Plan Update Technical Memo 3 – Regulatory Review

The City of Canby is undertaking an update of its Transportation System Plan (TSP) consistent with the requirements of Statewide Planning Goal 12 - Transportation. The Transportation Planning Rule (TPR), Oregon Administrative Rule 660 Division 12, implements Goal 12. The TPR defines the necessary elements of a local Transportation System Plan (TSP) and how Goal 12 should be implemented locally. The overall purpose of the TPR is to provide and encourage a safe, convenient, and economical transportation system. The Rule also implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in close coordination with urban and rural development. The TPR directs jurisdictions to integrate comprehensive land use planning with transportation needs and to promote multi-modal systems that make it more convenient for people to walk, bicycle, use transit, and drive less. Canby's TSP must be consistent with the current TPR, which was most recently amended in August 2022.

The TPR requires cities to prepare local TSPs that are consistent with the Oregon Transportation Plan (OTP); Technical Memorandum #2 (Plan Review Summary) addresses the OTP and other background documents that will be referenced in updating the Canby TSP. This memorandum will focus on the extent to which the City's policy and development requirements meet the requirements of TPR.



# **Canby Comprehensive Plan**

Pursuant to the TPR, cities are required to adopt a local TSP as part of their comprehensive plans. The 2010 Canby TSP was adopted as part of the Canby Comprehensive Plan's Transportation Element (Chapter 5).

Comprehensive Plan Goals and Objectives related to transportation are found within the adopted TSP and are "intended to guide the development of the 2030 Transportation System Plan (TSP) and the implementing ordinances for the City's development code."

The City's transportation policies will need to be reviewed and revised to be consistent with the goals and objectives of this TSP update and its ensuing recommendations.

What this means for the Canby TSP Update: The TSP update process will provide an opportunity to review and update the Comprehensive Plan transportation element and other transportation policies, to better represent current state and local practices and objectives. Potential policy changes may reflect issues that have been evolving since the TSP was last updated, such as strategies to optimize transportation management and maximizing the efficiency of the existing transportation system, integrating alternative transportation options, balancing modal capacity of facilities, and the role the transportation system plays in human health. Towards the end of the planning process, when solutions have been identified to satisfy future needs, policy statements will be developed to help implement TSP recommendations. Updated policy statements may augment or replace adopted comprehensive plan transportation policies and will help guide future actions, including land use decisions, after the TSP is adopted. The City will amend the comprehensive plan transportation policies in adherence to Goal 12 in the updated TSP document.



# **Canby Land Division and Development Regulations**

The Canby Municipal Code, under Title 16 Planning and Zoning, contains Division IV. Land Division and Division III. Zoning, which together controls the process of land development within the City. The City's Land Division Ordinance and Zoning Ordinance include standards for land uses, dimensions of parcels and roadways, parking and access regulations, application procedures, and other important information relevant to creating and maintaining a functioning transportation system. The TPR requires that the City evaluate development applications for their effect on the transportation system, and that the City requires consistency with its TSP from developments.

What this means for the Canby TSP Update: The TSP update will revisit transportation standards, such as those related to street functional classifications, street cross-sections, and mobility and access management. Where modifications are proposed to these standards, the City development requirements will need to be updated for consistency with the updated TSP. In addition, the Land Division Ordinance contains a number of other transportation-related development requirements (e.g., vehicular and bicycle parking, pedestrian access). Amendments to these development requirements may be needed in order to implement the recommendations of the updated TSP and to better comply with the TPR.

Table 1 describes how City land division, zoning, and development requirements meet specific TPR requirements and identifies recommended improvements where local requirements could be strengthened or modified to be more consistent with the TPR. The suggested draft code language will be prepared at the implementation phase of the TSP update that supports the policies and recommendations of the draft TSP and ensures consistency with the TPR.



## Table I. TPR Requirements and Recommendations for the Canby Development Code

TPR Requirement	Municipal Code References and Recommendations	
OAR 660-012-0045 – Implementation of the Transportation System Plan		
(1) Each local government shall amend its land use regula	ations to implement the TSP.	
<ul> <li>(a) The following transportation facilities, services and improvements need not be subject to land use regulations except as necessary to implement the TSP and, under ordinary circumstances do not have a significant impact on land use: <ul> <li>(A) Operation, maintenance, and repair of existing transportation facilities identified in the TSP, such as road, bicycle, pedestrian, port, airport and rail facilities, and major regional pipelines and terminals;</li> <li>(B) Dedication of right-of-way, authorization of construction and the construction of facilities and improvements, where the improvements are consistent with clear and objective dimensional standards;</li> <li>(C) Uses permitted outright under ORS 215.213(1)(m) through (p) and 215.283(1)(k) through (n), consistent with the provisions of 660-012-0065; and</li> <li>(D) Changes in the frequency of transit, rail and airport services.</li> </ul> </li> <li>(b) To the extent, if any, that a transportation facility, service, or improvement concerns the application of a comprehensive plan provision or land use regulation, it may be allowed without further land use review if it is permitted outright or if it is subject to standards that do not require interpretation or the exercise of factual, policy or legal judgment.</li> </ul>	The Comprehensive Plan includes policies aimed at the goal of developing and maintaining a transportation system that is safe, convenient, and economical. The first policy notes that Canby shall provide the necessary improvement to city streets and will encourage the county to make the same commitment to local county roads, in an effort to keep pace with growth. The second policy states that Canby shall work cooperatively with developers to assure that new streets are constructed in a timely fashion to meet the city's growth needs. Section 16.08.130 states that, "Pursuant to the Transportation Planning Rule, projects that are specifically identified in the Canby Transportation System Plan, for which the City has made all the required land use and goal compliance findings, are permitted outright and subject only to the standards established by the Transportation System Plan," while Section 16.49.030 exempts minor public facilities from site and design review. <b>Recommendation:</b> Consider consolidating transportation facilities from these various definitions and locations. This could be accomplished by adding "Transportation Facilities (operation, maintenance, preservation, and construction in accordance with the City's Transportation System Plan)" as a permitted use in all land use districts.	
	as an allowed use in other zoning districts.	



### TPR Requirement

(c) In the event that a transportation facility, service or improvement is determined to have a significant impact on land use or requires interpretation or the exercise of factual, policy or legal judgment, the local government shall provide a review and approval process that is consistent with 660-012-0050. To facilitate implementation of the TSP, each local government shall amend regulations to provide for consolidated review of land use decisions required to permit a transportation project.

#### Municipal Code References and Recommendations

TPR Section -0050 addresses project development and implementation - how a transportation facility or improvement authorized in a TSP is designed and constructed. Project development may or may not require land use decision-making. The TPR directs that during project development, projects authorized in an acknowledged TSP will not be subject to further justification with regard to their need, mode, function, or general location. To this end, the TPR calls for consolidated review of land use decisions and proper noticing requirements for affected transportation facilities and service providers.

The City allows for consolidated review of land use and development permits under 16.88.190- Conformance with Transportation System Plan and Transportation Planning Rule. This section states, "A proposed comprehensive plan amendment, zone change or land use regulation change, whether initiated by the city or by a private interest, shall be reviewed to determine whether it significantly affects a transportation facility, in accordance with the Transportation Planning Rule (OAR 660-012-0060)."

Section 16.08.150- Traffic Impact Study states that, "This section establishes the standards to determine when a proposal must be reviewed for potential traffic impacts; when a Traffic Impact Study must be submitted with a development application in order to determine whether conditions are needed to minimize impacts to and protect transportation facilities."

This TPR provision is met.



TPR Requirement	Municipal Code References and Recommendations	
(2) Local governments shall adopt land use or subdivision ordinance regulations, consistent with applicable federal and state requirements, to protect transportation facilities corridors and sites for their identified functions. Such regulations shall include:		
(a) Access control measures, for example, driveway and public road spacing, median control and signal spacing standards, which are consistent with the functional classification of roads and consistent with limiting development on rural lands to rural uses and densities;	Chapter 16.10 addresses off-street parking and loading and it requires driveway widths and driveway spacing based on street classification. Access spacing standards for roadways are provided in Section 16.46.030- Access Connection.	
	Section 16.88.190- Conformance with Transportation System Plan and Transportation Planning Rule states, "Amendments to the comprehensive plan and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the function, capacity, and performance standards (e.g., level of service, volume to capacity ratio, etc.) of the facility identified in the Transportation System Plan."	
	Recommendation: Update Chapter 16 to include access control measures that are consistent with the functional classification system recommended by the TSP update. Whether spacing standards are ultimately located within the development code or are referenced in the TSP will be discussed in the implementation phase of this process.	
(b) Standards to protect the future operations of roads, transitways and major transit corridors	Section 16.08.150 addresses Traffic Impact Study (TIS) regulations. A TIS is required by the city to adopt a process to apply conditions to development proposals in order to minimize adverse impacts to and protect transportation facilities.	
	This TIS is intended to ensure that operations of transportation facilities are maintained through individual land use decisions.	



TPR Requirement	Municipal Code References and Recommendations
	<b>Recommendation:</b> This TPR provision is met. However, the TSP update provides an ideal opportunity to revisit the thresholds that trigger a TIS, as well as the process and requirements. Any recommended changes resulting from this review may necessitate updates to Division III.
(c) Measures to protect public use airports by controlling land uses within airport noise corridors and imaginary surfaces, and by limiting physical hazards to air navigation;	This section is not applicable. Canby does not have an airport within city limits. <b>This TPR provision is met.</b>
(d) A process for coordinated review of future land use decisions affecting transportation facilities, corridors, or sites;	See response to -0045(1)(c).
	This TPR provision is met.
(e) A process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities, corridors, or sites;	This rule is implemented by sections 16.08.150 (Traffic Impact Study), 16.16-41 (Conditional Uses), and 16.35.050 Development Standards).
	Section 16.08.150 establishes the standards for when a proposal must be reviewed for potential traffic impacts, when a TIS must be submitted with a development application, the study area, and who is qualified to prepare the analysis.
	16.08.150 item J: Conditions of Approval notes that, "The city may deny, approve, or approve with appropriate conditions a development proposal in order to minimize impacts and protect transportation facilities."
	<b>This TPR provision is met.</b> The provisions of these sections will be revisited to ensure compliance with the updated TSP.
(f) Regulations to provide notice to public agencies providing transportation facilities and services, MPOs, and ODOT of:	Application and review procedures are detailed in Chapter 16.89 and state that



TPR Requirement	Municipal Code References and Recommendations	
<ul> <li>(A) Land use applications that require public hearings;</li> <li>(B) Subdivision and partition applications;</li> <li>(C)Other applications which affect private access to roads; and</li> <li>(D)Other applications within airport noise corridor and imaginary surfaces which affect airport operations.</li> </ul>	notice of any new proposal that includes a new transportation facility or improvement and if these facilities or improvements impact a collector or arterial street that notice will be sent out to ODOT, Clackamas County, and any other transportation interest groups. Depending on the decision type the code language notes that, "Any application that involves access to the state highway system must be provided to the Oregon Department of Transportation for their review and comment regarding conformance with state access management standards and requirements."	
	This TPR provision is met.	
(g) Regulations assuring amendments to land use designations, densities, and design standards are consistent with the functions, capacities and performance standards of facilities identified in the TSP.	Section 16.88.190 A. and B. require any proposed comprehensive plan amendment, zone change, or land use regulation change shall be reviewed to determine if it affects a transportation facility, in accordance with the Transportation Planning Rule (OAR 660-012- 0060).	
	This TPR provision is met.	
(3) Local governments shall adopt land use or subdivision regulations for urban areas and rural communities as set forth below.		
(a) Bicycle parking facilities as part of new multi-family residential developments of four units or more, new retail, office and institutional developments, and all transit transfer stations and park-and-ride lots.	Bicycle parking is addressed in Section 16.10.100. Bicycle parking facilities are required as part of new multifamily residential developments of 4 units or more, as well as institutional, commercial, and industrial uses. The amount of bicycle parking required depends on the number of required vehicle parking spaces.	
	Recommendation:	



TPR Requirement	Municipal Code References and Recommendations
	Bicycle parking facilities should be required in the municipal code surrounding all transit transfer stations and park-and-ride lots.
<ul> <li>(b) On-site facilities shall be provided which accommodate safe and convenient pedestrian and bicycle access from within new subdivisions, multi-family developments, planned developments, shopping centers, and commercial districts to adjacent residential areas and transit stops, and to neighborhood activity centers within one-half mile of the development. Single-family residential developments shall generally include streets and accessways. Pedestrian circulation through parking lots should generally be provided in the form of accessways.</li> <li>(A) "Neighborhood activity centers" includes, but is not limited to, existing or planned schools, parks, shopping areas, transit stops or employment centers;</li> <li>(B) Bikeways shall be required along arterials and major collectors. sidewalks shall be required along arterials, collectors and most local streets in urban areas except that sidewalks are not required along controlled access roadways, such as freeways;</li> <li>(C) Cul-de-sacs and other dead-end streets may be used as part of a development plan, consistent with the purposes set forth in this section;</li> <li>(D) Local governments shall establish their own standards or criteria for providing streets and accessways consistent with the purposes of this section. Such measures may include but are not limited to: standards for spacing of streets or accessways; and standards for excessive out-of-direction travel;</li> <li>(E) Streets and accessways need not be required where one or more of the following conditions exist:     <ul> <li>(i) Physical or topographic conditions make a street or accessway connection impracticable. Such conditions include but are not limited to</li> </ul> </li> </ul>	1 0
freeways, railroads, steep slopes, wetlands or other bodies of water where a connection could not reasonably be provided; (ii) Buildings or other existing development on adjacent lands physically preclude a connection now or in the future considering the potential for redevelopment; or	should be applied. <b>Street and accessway layout</b> : Section 16.64.020 establishes block sizes for subdivisions. Block length is restricted to 1,000 feet, and a pedestrian or bicycle way



C C	
restrictions, or other agreements existing as of May 1, 1995, which preclude a required street or accessway connection.	<ul> <li>may be required if block length exceeds that figure.</li> <li>Cul-de-sacs: Section 16.64.010 notes that culde-sacs are required to include pedestrian accessways. They are also limited to a length of 400 feet.</li> <li><u>Recommendations:</u> <ul> <li>Include references in Divisions III and IV to adopted street standards in the updated TSP. Street standards will need to comply with the bikeway requirements within the TPR.</li> <li>Evaluate the 1,000 foot block length and accessway requirements as part of the TSP update.</li> </ul> </li> </ul>
condition of development approval, they shall include facilities accommodating convenient pedestrian and bicycle and pedestrian travel, including bicycle ways on arterials and major collectors.	Section 16.49.50 for Off-Site Improvements states that the following type of condition may be contemplated, "Improvements in public facilities, including public utilities, not located on the project site where necessary to assure adequate capacity and where service demand will be created or increased by the proposed development. The costs of such improvements may be paid for in full while allowing for recovery of costs from users on other development sites, or they may be pro- rated to the proposed development in proportion to the service demand projected to be created on increases by the project. If determined appropriate by the city based on specific site conditions, off-site roadway improvements may be required to accommodate bicycle and pedestrian travel consistent with the TSP and applicable sections of this code."



TPR Requirement	Municipal Code References and Recommendations	
<ul> <li>(d) For purposes of subsection (b) "safe and convenient" means bicycle and pedestrian routes, facilities and improvements which: <ul> <li>(A) Are reasonably free from hazards, particularly types or levels of automobile traffic which would interfere with or discourage pedestrian or cycle travel for short trips;</li> <li>(B) Provide an accessible and reasonably direct route of travel between destinations such as between a transit stop and a store; and</li> <li>(C) Meet travel needs of cyclists and pedestrians considering destination and length of trip; and considering that the most common trip length of pedestrians is generally under one-half mile.</li> </ul> </li> </ul>	Section 16.04.545 notes that the city should provide "safe and convenient" bicycle and pedestrian routes. These routes should be safe and reasonable free from hazards and should provide a reasonably direct route of travel between destinations. <b>This TPR provision is met.</b>	
(e) Internal pedestrian circulation within new office parks and commercial developments shall be provided through clustering of buildings, construction of accessways, walkways and similar techniques.	Section 16.49.065 requires that within new office parks and commercial development there should be at least one sidewalk connection between the proposed development and each abutting commercial or office property, walkways shall be provided to the street for every 300 feet of developed frontage, walkways shall be direct with minimal driveway crossings, walkways should be linked to internal circulation of the building, and walkways shall be at least five feet wide and shall be raised.	
	This TPR provision is met.	
(4) To support transit in urban areas containing a population greater than 25,000, where the area is already served by a public transit system or where determination has been made that a public transit system is feasible, local governments shall adopt land use and subdivisions as provided in subsections (a)-(g) below.		
(a) Transit routes and transit facilities shall be designed to support transit use through provision of bus stops, pullouts and shelters, optimum road geometrics, on-road parking restrictions and similar facilities, as appropriate	The City of Canby does not have a population greater than 25,000. The community is currently served by Canby Area Transit and the updated TSP will address existing and future transit facilities and services.	



TPR Requirement	Municipal Code References and Recommendations
	<b>Recommendation:</b> The TSP update planning process will identify transit routes and ensure that roadway design requirements will accommodate service on existing and planned routes. Depending on the draft TSP recommendations, update development requirements as necessary to address the provision of transit amenities.
<ul> <li>(b) New retail, office and institutional buildings at or near major transit stops shall provide for convenient pedestrian access to transit through the measures listed in (A) and (B) below.</li> <li>(A) Accessible walkways shall be provided connecting building entrances and streets adjoining the site;</li> <li>(B) Accessible pedestrian facilities connecting to adjoining properties shall be provided for in paragraph (3)(b)(E).</li> <li>Pedestrian facilities shall connect the on site circulation system to existing or proposed streets, walkways, and driveways about the property. Where adjacent properties are undeveloped or have potential for redevelopment, streets, accessways and walkways on site shall be laid out or stubbed to allow for extension to the adjoining property;</li> <li>(C) In addition to (A) and (B) above, on sites at major transit stops provide the following:</li> <li>(i) Either locate buildings within 20 feet of the transit stop, a transit street or an intersecting street or provide a pedestrian plaza at the transit stop and building entrances on the site;</li> <li>(ii) An accessible and reasonably direct pedestrian facility between the transit stop and building entrances on the site;</li> <li>(iii) A transit passenger landing pad accessible to people with disabilities;</li> <li>(iv) An easement or dedication for a passenger shelter if requested by the transit stop.</li> </ul>	Access to transit is not currently addressed by the TSP in any significant way. Goal #1 within the TSP notes, "Serve the transportation needs of residents, employees, and visitors with convenient, safe, affordable and efficient transit and alternative transportation services that offer a viable alternative to the automobile and provide key connections to other regional options." Objective 2, in order to complete Goal 1, states that access to transit and other alternative transportation options must be enhanced within Canby. <b>Recommendation:</b> See response to - 0045(4)(a). Update the development code based on findings regarding major transit stops once the TSP is updated.
(c) Local governments may implement paragraphs (b)(A) and (B) through the designation of pedestrian districts and adoption of appropriate implementing measures regulating development within pedestrian districts. Pedestrian districts must comply with the requirement of paragraph (b)(C).	The City can also meet the requirements of the TPR related to pedestrian connections to transit (TPR -0045(4)(b)(A) and (B)) by adopting appropriate implementing measures within a designated pedestrian



TPR Requirement	Municipal Code References and Recommendations
	district. The City of Canby currently does not have pedestrian district designations. Major transit stops are at Canby Square, Canby Transit Center, and Canby Market Square. The zoning for these major transit stops consists of Light Industrial, Commercial Manufacturing, and Downtown Commercial. Both Light Industrial and Commercial Manufacturing require 10 foot street yard setbacks and 20 foot setbacks for gas stations. Downtown Commercial zoning requires setbacks to be measured and overhangs to not exceed 2 feet.
	The TSP states, "Canby's downtown pedestrian system is fairly complete with sidewalks on both sides of the street at most locations. In addition, there are a variety of complementary pedestrian facilities, including aesthetic treatments at intersections, ADA-compliant curb ramps, raised sidewalks, curb-extensions, and pedestrian-scale lighting" Within the TSP pedestrian system deficits are explained further such as a lack of landing pads, crosswalks, and pedestrian access.
	<b>Recommendation:</b> For the approach offered by TPR -0045(4)(c), the City would need to consider designating pedestrian districts and developing specific code language to address, among other things, "major transit stops," as defined through the TSP update.
<ul> <li>(d) Designated employee parking areas in new developments shall provide preferential parking for carpools and vanpools</li> <li>(e) Existing development shall be allowed to redevelop a portion of existing parking areas for transit-oriented uses, including bus stops and pullouts, bus shelters, park and ride stations, transit-oriented developments, and similar facilities,</li> </ul>	Chapter 16.10 addresses parking and loading generally. Parking is addressed when determining the amount of parking spaces per employee of an establishment but does not determine need for carpools, vanpools, or transit-oriented uses.
where appropriate;	<b>Recommendation:</b> The City should consider requiring that new developments with



TPR Requirement	Municipal Code References and Recommendations
<ul> <li>(f) Road systems for new development shall be provided that can be adequately served by transit, including provision of pedestrian access to existing and identified future transit routes. This shall include, where appropriate, separate accessways to minimize travel distances;</li> <li>(g) Along existing or planned transit routes, designation of types and densities of land uses adequate to support transit.</li> </ul>	planned designated employee parking areas provide preferential parking for employee carpools and vanpools. A typical local code requirement requires employers with more than a specific number of employees, or developments where required parking spaces exceed a specific number, to dedicate a percentage of the required parking spaces for car/vanpools.
(5) In developing a bicycle and pedestrian circulation plan as required by 660-012-0020(2)(d), local governments shall identify improvements to facilitate bicycle and pedestrian trips to meet local travel needs in developed areas. Appropriate improvements should provide for more direct, convenient, accessible, and safer bicycle or pedestrian travel	The TSP update is expected to include a considerable update to the City's bicycle and pedestrian circulation plan, consistent with TPR -0020. This TPR requirement is currently implemented in City requirements as follows.
within and between residential areas and neighborhood activity centers (i.e., schools, shopping, transit stops). Specific measures include, for example, constructing walkways between cul-de-sacs and adjacent roads, providing walkways between buildings, and providing direct access between adjacent uses.	A bike circulation plan and a pedestrian circulation plan are outlined in the TSP and is shown in figures 6-1 and 5-1. The TSP requires that there is a maximum 330' spacing between pedestrian and bicycle connections. The TSP also provides a maximum 300' spacing for bike and pedestrian accessways. The TSP also limits block length and perimeter and requires street connectivity for 'efficient vehicular and pedestrian circulation.'
	For walkways between cul-de-sacs and adjacent roads see a response and recommendations related to cul-de-sacs in Section -0045(3)(b).
	For walkways between buildings see a response and recommendations related to accessways in section 0045(3)(b).
	For access between adjacent uses see a response and recommendations related to accessways in section 0045(3)(b).
	Recommendation:



TPR Requirement	Municipal Code References and Recommendations
	This requirement will be addressed by the TSP update planning process and can be implemented locally by requiring improvements in developing areas consistent with adopted code provisions.
(6) Local governments shall establish standards for local streets and accessways that minimize pavement width and total ROW consistent with the operational needs of the facility. The intent of this requirement is that local governments consider and reduce excessive standards for local streets and accessways in order to reduce the cost of construction, provide for more efficient use of urban land, provide for emergency vehicle access while discouraging inappropriate traffic volumes and speeds, and which accommodate convenient pedestrian and bicycle circulation. Notwithstanding section (1) or (3) of this rule, local street standards adopted to meet this requirement need not be adopted as land use regulations.	Section 16.86.020 establishes that right-of- way widths and cross section standards for new streets shall be in conformance with the Canby Transportation System Plan and Public Works Design Standards Document. Canby's Public Works Design Standards shows standards of right-of-way, pavement width, and sidewalk width based on the classification of the street. This standard for a local street meets the requirements of Canby's Public Works Design Standards as well as Oregon's Neighborhood Street Design Standards. <b>Recommendation:</b> The TSP update process provides the City with the opportunity to evaluate local streets standards to determine if modifications need to be made to both meet the current and future needs of the community and implement this TPR requirement.
OAR 660-12-0060	
<ul> <li>(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:</li> <li>(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);</li> </ul>	TPR compliance is addressed in Section 16.08.150 Traffic Impact Study, which provides the City a process to apply conditions to development proposals in order to minimize adverse impacts to and protect transportation facilities. <b>This TPR provision is met.</b>



TPR Requirement	Municipal Code References and Recommendations
(b) Change standards implementing a functional classification system; or	
(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection. If a local government is evaluating a performance standard based on projected levels of motor vehicle traffic, then the results must be based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.	
(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;	
(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or	
(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.	