

STAFF REPORT

TYPE IV HEARING: COMPREHENSIVE PLAN AMENDMENT

Transportation System Plan Update

TO: Gresham Planning Commission

FROM: Jay Higgins, Senior Transportation Planner

HEARING DATE: March 23, 2026

REPORT DATE: March 13, 2026

FILE NUMBER: CPA-26-00021

PROPOSAL: To adopt Comprehensive Plan text amendments to Volume 1: Findings, Volume 2: Policies, and Volume 4: Transportation System Plan of the Gresham Community Development Plan. These amendments update the Transportation System Plan policies related to safety, equity, climate, and micromobility. The proposal removes and replaces related transportation policies in Volume 1 and Volume 2 to align with the Transportation System Plan.

EXHIBITS: A. Proposed Comprehensive Plan Amendments, including Exhibits:
 1. Draft Volume 2, 10.320 Transportation System
 2. Draft Volume 4, Transportation System Plan

RECOMMENDATION: Staff recommends adoption of the proposed Comprehensive Plan text amendments, CPA-26-00021, as contained in the attached exhibits, based on the findings, conclusions, and recommendations in the March 13, 2026, staff report.

SECTION I. EXECUTIVE SUMMARY

The Transportation System Plan (TSP) is a twenty-year blueprint for how people get around Gresham, whether by biking, walking, driving, or taking public transit. The TSP update project revises major parts of the TSP that were last adopted in 2013. The project aligns transportation goals with the Regional Transportation Plan and creates new transportation policies related to safety, equity, climate, and micromobility. The project also reprioritizes the project lists based on these policies and creates new financial projections to predict how many projects can be funded. The proposed changes include a new document layout and edited language to make the TSP easier to understand.

Additional proposed changes to the Comprehensive Plan are to Volume 1 to update the TSP description and remove outdated information about electric vehicles. Proposed changes in Volume 2 remove items that have been completed or are accounted for in the Transportation System Plan. This includes aligning the transportation policies with the newly adopted policies and moving all transportation action items to the TSP.

Community Engagement and Involvement

Community engagement took place throughout the TSP project, with two major phases of outreach. Early outreach focused on understanding community values around safety, equity, climate resilience, and new transportation technologies. Staff gathered community input through a range of engagement activities, such as: community events, focus groups, surveys, and online open houses.

To ensure the TSP reflects the needs of all residents, the City conducted focused outreach to engage underrepresented communities. Focus groups led by Community Engagement Liaisons were held in English and Spanish to support more accessible and comfortable discussions. The City also partnered with low-income and affordable housing developments to reach residents often left out of traditional engagement.

Staff maintained a TSP project page on the EngageGresham.org website with a summary of the project, including project goals and status; and the opportunity to post comments or contact staff for more information. The Transportation Subcommittee and additional volunteers formed the TSP Advisory Committee and met throughout the project to review documents and provide feedback.

The project included the following Public Participation:

- Meals on Wheels - July 18, 2024
- Festival of Arts - July 20, 2024
- Rockwood National Night Out - July 23, 2024
- Rockwood Village Block Party - July 27, 2024
- Rock the Block - August 24, 2024
- Rockwood Community Market - September 15, 2024
- Meals on Wheels - September 26, 2024
- Focus Groups - BIPOC and Spanish Language - September 28, 2024
- Focus Groups - Multi-family Complexes – September 24, October 16, October 23, 2024
- Gresham Farmers Market - October 5, 2024
- The People's Farmers' Market - October 13, 2024
- Civic Academy (hosted by Latino Network and ARISE and Shine) - December 10, 2024
- Online Open House - January 20 to February 28, 2025
- Focus Groups - BIPOC and Spanish Language - January 29 and February 4, 2025
- Learn Share Do Fair - February 22, 2025
- Online Open House - June 17 to July 21, 2025
- TSP Advisory Committee / Transportation Subcommittee – May 1, 2024, July 10, 2024, September 12, 2024, October 10, 2024, June 12, 2025
- Planning Commission Work Session - June 23, 2025
- Neighborhood Coalition - July 8, 2025
- Council Work Session - July 15, 2025
- Additional: Project website, City calendar, Neighborhood Connections e-newsletter updates, Social media promotion

The following required notices were sent for the project:

- Notice of the proposed Comprehensive Plan changes were sent to the Department of Land Conservation and Development (DLCD) and Metro on February 13, 2026; complying with the requirement to provide such notice at least 35 days before the first hearing. Notice of the March 23, 2026 Planning Commission hearing was published in the Gresham Outlook on March 11, 2026. Notice of the April 21, 2026 City Council hearing will be published in the Gresham Outlook no later than April 8, 2026. A Measure 56 notice is not required for this comprehensive plan amendment.

Public Comments

As of the date of this report no public comments were received.

Proposed Comprehensive Plan Amendments Overview

The overview provided below summarizes the changes proposed to the Gresham Community Development Plan (GCDP). The plan consists of five volumes—Volume 1: Findings, Volume 2: Policies, Volume 3: Development Code, Volume 4: Transportation System Plan, Volume 5: Capital Improvement Plan. Updates are proposed to Volume 1, Volume 2, and Volume 4. The full text of the proposed updates for Volume 1 and Volume 2 is provided in Exhibit ‘A’ (formatted in ~~strikeout~~underline), with the full replacement text of 10.320 Transportation provided in Exhibit ‘1’. The repeal and replacement of Volume 4 is provided in Exhibit ‘2’.

The following changes are proposed:

Volume 1 – Findings

2.381.6 Electric Vehicle Charging Stations

Remove section as the information is out of date. Support for electric vehicles and charging for electric vehicles is found in the Transportation System Plan and in the City of Gresham’s Climate Action Plan.

Volume 2 – Policies

10.013 Preface, Comprehensive Plan Format, and Introduction

This section is amended to update information about the Transportation System Plan written since 2003. The multiple updates include: the 2013 Transportation System Plan, the 2019 Pleasant Valley TSP update, the 2020 Active Transportation Plan, and the 2026 Transportation System Plan update.

10.313 Industrial Land Use

The proposed changes remove action measure 9 regarding a freight plan, as it is complete with the East County Metro Connections Plan, which was included in the 2013 Transportation

System Plan. The proposal also removes action measure 19, because freight actions to coordinate and support freight have been moved to the Transportation System Plan.

10.314 Downtown Plan District

The proposed changes remove goals for the Downtown Plan District that are city wide and covered by Transportation System Plan policies or modal plans. It removes Beech Street design, as this is complete, and language about MAX extension and stations as this is directed by the Transit System Plan in Chapter 5 of the Transportation System Plan. The action measures are removed as they are covered by policies and action measures of the Transportation System Plan.

10.318 Gresham Civic Neighborhood

This removes a policy related to parking, as Parking Management policies are covered in the Transportation System Plan. It also removes a street design action that is covered by the Transportation System Plan and the Public Works Standards.

10.319 Central Rockwood Area

The proposed changes remove three Implementation Strategies that are complete or are street design elements that are covered by the Transportation System Plan and the Public Works Standards.

10.320 Transportation System

The proposed change is to replace all the policies and action measures to align to the new policies proposed in the draft Transportation System Plan. This is consistent with how the policies are currently aligned with the Transportation System Plan.

10.411 Access to Schools

This section is proposed for deletion. The Transportation System Plan includes policies and actions related to health and the built environment to encourage more active movement, especially through trips to everyday destinations, such as schools.

10.413 Community Design

The proposed policy for deletion is street design standards in the Rockwood Design District. All street design standards are covered in the Transportation System Plan and the Public Works Standards. Additionally two action measures related to multi-modal connectivity and street design have been completed are also proposed to be deleted.

10.416 Community Health and the Built Environment

A policy and an action measure related to health and active transportation are removed as these are covered by policies in the Transportation System Plan.

10.700 Pleasant Valley Plan District

The proposed change is to remove a multi-modal policy for the Pleasant Valley Town Center. Multi-modal policies are city wide and covered by the Transportation System Plan.

10.800 Springwater Plan District

This section removes policies in Section 10.803 Sustainability that are complete, as the Transportation System Plan already has a plan for Springwater Plan District. All policies and action measures in Section 10.805 Transportation are also removed if they are covered by the Transportation System Plan.

Volume 4 - Transportation System Plan

The Transportation System Plan is repealed and replaced by the Draft 2026 Transportation System Plan. This has new policies for safety, equity, climate, and micromobility. Goals were updated to align with Metro's regional transportation goals and new project lists were prioritized for vehicles, pedestrians, and bicycles.

SECTION II - Applicable Community Development Code Procedures

Section 11.0200 Initiation and Classification of Applications

Section 11.0600 Type IV Legislative Procedures

Section 11.1000 Public Hearings

Section 11.0200 – Initiation and Classification of Applications

11.0201 – Initiation of an Application

This section provides that City Council may initiate a Type IV legislative application to amend the Community Development Plan.

Findings:

The Transportation System Plan Update project was initiated by City Council on August 17, 2021. Initiation of changes to the Comprehensive Plan Volumes 1 and 2, in support of the Transportation System Plan Update project was on February 17, 2026. City Council will review these amendments at a hearing on April 21, 2026.

11.0203 and 11.0204 – Classification of Applications and Review Authorities

These sections provide that Type IV procedures are legislative and typically involve the adoption, implementation, or amendment of policy by ordinance. They also provide that the Planning Commission provide a recommendation on Community Development Plan Amendments and the City Council be the decision-making authority.

Findings:

This project meets those conditions and is being processed under the Type IV procedures and will be heard by both the Planning Commission and the City Council.

Section 11.0600 – Type IV Legislative Procedures

11.0602(A)&(B) – Pre-application and Neighborhood Meetings

These meetings are not required of Type IV legislative applications.

Findings:

Although a pre-application meeting and neighborhood meetings are not required, public meetings were held and provisions for public involvement were included in the project.

11.0602(C) – Application Initiation

This section provides that the City Council may initiate a Type IV legislative application to amend the text of the Community Development Plan.

Findings:

As noted above, the Transportation System Plan Update project was initiated by City Council on August 17, 2021. Initiation of changes to the Comprehensive Plan Volumes 1 and 2, in support of the Transportation System Plan Update project was on February 17, 2026.

11.0602(D)(1) – Type IV Public Notice for Comprehensive Plan Amendments

(a) For a Type IV Comprehensive Plan Amendment this section requires a submittal to the DLCDD and Metro at least 35 days prior to the Planning Commission hearing.

(c) This section requires that at least 10 days before the initial hearing, a notice be published in a newspaper of general circulation in the city and copies of the hearing notice made available in City Hall.

Findings:

Submittal to DLCDD and Metro was made on February 13, 2026, which was more than 35 days prior to the scheduled Planning Commission hearing date of March 23, 2026. Required notice of the public hearing for these proposed amendments was published in the *Gresham Outlook* before March 13, 2026 (10 days in advance of the March 23, 2026 Planning Commission Hearing) and was made available through City Hall as required by this section.

11.602(E) – Type IV Decision Authority and 11.602(F) Type IV Notice of Decision

This section requires that the Planning Commission hold a public hearing and make a recommendation to the Council for an amendment to the Community Development Plan. The Council considers that recommendation at their hearing and makes a final decision. Interested persons may present evidence and testimony relevant to the proposal at either or both hearings.

Findings:

The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings.

This standard will be met with issuance of a decision.

11.1000 – Public Hearings

This section provides for a hearing process consistent with Section 11.1000.

Findings:

The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings.

This standard will be met with issuance of a decision.

Conclusion: The proposed amendments meet all applicable Development Code standards and procedures.

III. APPLICABLE COMMUNITY DEVELOPMENT PLAN (GCDP) GOALS & POLICIES

Section 10.014 Land Use Policies and Regulations

Section 10.100 Citizen Involvement

Section 10.320 Transportation System

This section identifies the applicable Community Development Plan goals and policies. The text (*italicized*) of the policy is followed by corresponding findings and conclusions.

Section 10.014 – Land Use Policies and Regulations

Goal: Maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham's land use program.

Policy 6. The City shall, consistent with applicable laws, ensure that all required public facilities and services are available or committed prior to development approval and are

constructed or provided concurrently with development or prior to development occupancy, except that developments in Heavy Industrial (HI) and General Industrial (GI) Land Use Districts may be approved when the development will cause traffic to temporarily reach an unacceptable Level of Service and the needed improvement is included in a City-approved plan to address the deficiency.

Policy 21. Council may, upon finding it is in the overall public interest, initiate legislative processes to change the Comprehensive Plan text and Community Development Plan Map(s) and Development Code.

Action Measure 11. Revise the Comprehensive Plan Text, Map and related findings as needed to maintain its reliability and timelines to ensure consistency among goals, policies, implementing measures; accuracy of findings and compliance with regional, state and federal laws and rules. This includes review by the Planning Commission every two years; a formal evaluation every five years and an overall update at least every ten years.

Action Measure 12. Monitor and evaluate whether City actions and resulting community conditions and circumstances are consistent with the goal and policy directions of the Comprehensive Plan and, when appropriate, take actions to either:

a. Amend the Plan to ensure it corresponds with current community conditions and circumstances, and/or

b. Change City actions, procedures, regulations or standards to be consistent with the Comprehensive Plan.

Findings:

City Council initiated this update to the Transportation System Plan on August 17, 2021 to implement policy changes related to safety, equity, climate, and micromobility per Policy 21 and Action Measure 11. Initiation for amendments to Volume 1 and Volume 2 to support the Transportation System Plan Update was on February 17, 2026 to meet Action Measure 12.

The proposed amendments to Volume 2 are to keep the Comprehensive Plan up to date per Action Measure 11, so there is consistency with the new Transportation System Plan. The proposed amendments to the Transportation System Plan ensure it is consistent with the Regional Transportation Plan in regards to safety, equity, climate, and micromobility. The proposed amendments to the Transportation System Plan also align it with the city's adopted Climate Action Plan and national best practices for safety, which are in the overall public interest.

Updated transportation projects and maps highlight for the City which public facilities are in need of improvement when development occurs and implements Policy 6.

Conclusion: The proposed amendments to the Gresham Community Development Plan meet the applicable Land Use Policies and Regulations goal to maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham's land use program.

Section 10.100 – Citizen Involvement

Goal: The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.

Policy 1: The City shall ensure the opportunity for citizen participation and input when preparing and revising policies, plans, and implementing regulations.

Policy 2: The City shall consider the interests of the entire community and the goals and policies of the Comprehensive Plan when making decisions.

Policy 6: The City shall ensure that technical information necessary to make policy decisions is readily available.

Policy 7: The City shall facilitate involvement of citizens in the planning process, including data collection, plan preparation, adoption, implementation, evaluation, and revision.

Policy 9: The City shall ensure that citizen involvement plans and activities incorporate Gresham's diverse constituencies regardless of age, sex, religion, social, or business affiliation.

Policy 10: The City shall ensure the opportunity for the public to be involved in all phases of planning projects and issues.

Policy 11: The City shall ensure that the public has complete and timely access to all public information concerning land use projects and issues. This includes private proposals once they are in the formal application process.

Action Measure 2 : Ensure that the input, information, factual contributions, and expertise provided by citizens is considered...

Action Measure 4: Keep the public informed of opportunities for involvement in all phases of land use planning issues...

Action Measure 5: Provide citizens timely access to all public information related to land use matters...

Action Measure 6: Communicate information clearly and effectively

Action Measure 7: Engage in outreach activities to inform and encourage public involvement...

Action Measure 8: Facilitate citizen input in the process for revising local land use plans and ordinances...

Action Measure 9: Make public participation processes user-friendly...

Action Measure 10: Encourage broadly based public participation including all geographic areas and diverse interests...

Action Measure 11: When appropriate, provide culturally-sensitive participation opportunities, which may include language translation and interpretation.

Findings:

The public involvement goals and policies establish the City's intent that its citizens have meaningful opportunities throughout a planning project to be informed and to affect proposals. The project included the following public meetings and outreach events:

- Meals on Wheels - July 18, 2024
- Festival of Arts - July 20, 2024
- Rockwood National Night Out - July 23, 2024
- Rockwood Village Block Party - July 27, 2024
- Rock the Block - August 24, 2024
- Rockwood Community Market - September 15, 2024
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- Gresham Farmers Market - October 5, 2024
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- Planning Commission Work Session - June 23, 2025
- Neighborhood Coalition - July 8, 2025
- Council Work Session - July 15, 2025
- Additional: Project website, City calendar, Neighborhood Connections e-newsletter updates, Social media promotion

The public was informed of opportunities for involvement through the City's calendar, the project website, and emails to an interested parties sign-up list. Community Liaisons on the project spoke Spanish and English allowing for immediate translation. Two focus groups were held in Spanish to bring diverse perspectives into the project. Translation services are also advertised on the footer of City web pages.

Draft Planning Commission minutes will be forwarded to City Council prior to the final Hearing for their consideration while making a decision in response to Action Measure 2. The recording of the PC Hearing will also be available to Council and the public prior to the final hearing.

Conclusion: The proposed amendments meet the applicability goals, policies and action measures in Section 10.100 – Citizen Involvement.

10.320 Transportation System

GOALS

- 1. Ensure the transportation system provides a safe, secure and attractive travel experience that supports livability and community interaction.*
- 2. Ensure access and mobility by increasing multimodal travel options and providing a continuous, interconnected transportation system.*
- 3. Facilitate development of a transportation system that aligns with adopted local and regional land use plans, is responsive to the surrounding community and is cost effective to develop and maintain.*

Policy 1: Develop and promote a balanced transportation system that provides a variety of travel options and reduces the need to rely on automobiles.

Policy 2: Plan, implement and maintain an efficient transportation system.

Policy 3: Provide a transportation system that maximizes accessibility to and within regional centers, town centers, transit corridors, station areas, and employment centers.

Policy 4: Provide a safe transportation system.

Findings:

The transportation system goals ensure a safe, coordinated system that serves all modes of travel, provides accessibility across the city, and is aligned with regional plans. The new Transportation System Plan keeps the intent of these goals and expands them to five goals that are more closely aligned with the goals of the Regional Transportation Plan. The transportation system policies are expanded to six policies to more specifically relate to safety, equity, multi-modal travel, reduction of climate impacts, and accessibility to regional centers like Downtown, Civic, and Rockwood.

Conclusion: The proposed amendments include the intent of these goals and policies, while also expanding them to more closely align with regional plans.

10.320.1 Street System

Policy 1: Provide a street system that accommodates a variety of travel options.

Policy 2: Develop a street system that meets current needs and anticipated future population growth and development.

Policy 3: Provide a street system that maximizes accessibility and mobility within the community.

Policy 4: Ensure a street system that is safe and supports healthy, active living.

Findings:

The street system policies describe the types of streets Gresham should build and the types of activities supported by those streets. The new Transportation System Plan includes these policies directly. Street types do not change in the new Transportation System Plan, and streets still support multi-modal travel options, are sized to accommodate growth, and provide access in the community.

Conclusion: These policies are included in the proposed Transportation System Plan.

10.320.2 Transit System

Policy 1: Advocate convenient, expanded transit service within Gresham and the east Multnomah County area.

Policy 2: Encourage efficient transit services to meet the current and projected transportation needs of the citizens of Gresham.

Policy 3: Promote the development of a transit system that maximizes accessibility.

Policy 4: Assist in the development of a safe transit system.

Findings:

The transit system policies encourage transit service across the City to meet the needs of the community. The new Transportation System Plan carries over policy 1 and policy 4 directly and makes small changes to policy 2 and policy 3 while retaining their intent. The proposed changes serve those that ride transit most, people with low incomes, and encourage first/last-mile services to get to transit for travel.

Conclusion: The intent of these policies are expanded to benefit transit riders and the community and are included in the new Transportation System Plan.

10.320.3 Bicycle System

Policy 1: Develop a continuous and convenient bicycle network.

Policy 2: Support programs and projects to improve bicycle safety and reduce the rate of bicycle-related crashes.

Findings:

The bicycle system policies focus on expanding the network and safety. These themes are included in the three proposed bicycle policies in the new Transportation System Plan. The proposed policies also encourage bicycling to support physical and mental health. The new Transportation System Plan has an updated Bicycle System Plan map and projects to support the construction of an expanded bicycle network.

Conclusion: The intent of these policies are expanded to benefit bicyclists and are included in the new Transportation System Plan.

10.320.4 Pedestrian System

Policy 1: Provide pedestrian facilities that are continuous, accessible, and adaptable to all users.

Policy 2: Improve pedestrian access to transit from residential, commercial, industrial and institutional developments.

Policy 3: Develop and promote safe pedestrian environments.

Findings:

The pedestrian system policies focus on expanding pedestrian facilities and safety. These themes are carried forward in the four proposed pedestrian policies in the new Transportation System Plan. The proposed policies also focus on accessibility of everyday destinations and encouraging walking to support physical and mental health. The new Transportation System Plan has an updated Pedestrian System Plan map and projects to support the construction of expanded pedestrian facilities.

Conclusion: The intent of these policies are expanded to benefit pedestrians and are included in the new Transportation System Plan.

10.320.5 Transportation Demand Management

Policy 1: Implement transportation demand management programs and strategies that reduce the need to single occupant vehicle (SOV) travel and make walking, bicycling and taking transit more convenient for all trips to and within Gresham.

Findings:

The Transportation System Plan has a section on Transportation Demand Management. The section highlights where programming is successful at encouraging alternatives to vehicle travel, such as Safe Routes to School events, and proposes expanding programming to more audiences.

Conclusion: This policy is included in the new Transportation System Plan.

10.320.6 Transportation System Management Operations / Intelligent Transportation Systems

Policy 1: Implement transportation system management operations and intelligent transportation systems programs and strategies that reduce the need for single occupant vehicle (SOV) travel and make walking, bicycling and taking transit more convenient for all trips to and within Gresham.

Findings:

New transportation technology can make intersections more efficient, direct travelers with variable message signs, and prepare the system for connected vehicles. These and other transportation system management operations are about how to manage the system to achieve policies, not a policy in itself. These important considerations have been moved to an implementation action in the new Transportation System Plan, Chapter 6.

Conclusion: The intent of the policy is included in the new Transportation System Plan.

10.320.7 Parking Management

Policy 1: Manage the on- and off-street parking supply to ensure there is an adequate but not excessive amount of parking available for all land uses.

Findings:

This policy is unchanged in the new Transportation System Plan. The Parking Management section highlights the new Parking Management Manual and its approach to parking management in Downtown; using data and parking usage thresholds to determine when parking congestion warrants City intervention.

Conclusion: This policy is included in the new Transportation System Plan.

10.320.8 Truck And Rail Freight System

Policy 1: Provide for the safe and efficient movement of truck and rail freight through and within Gresham.

Findings:

The Transportation System Plan has a section on Freight which covers the streets most important to freight through movement and for access to industrial areas. Street designs incorporate considerations for freight trucks in industrial areas. This policy is unchanged in the new Transportation System Plan.

Conclusion: This policy is included in the new Transportation System Plan.

10.320.9 Passenger Rail

Policy 1: Support federal, state, regional and private investments in passenger rail service to the metropolitan area.

Findings:

Passenger Rail does not stop in Gresham, but the City can support passenger rail at other levels of government as it helps to meet Gresham's multi-modal and climate action goals. This policy is unchanged in the new Transportation System Plan.

Conclusion: This policy is included in the new Transportation System Plan.

10.320.10 Air Transportation System

Policy 1: Ensure that land uses in Gresham are compatible with aircraft noise exposure and aircraft safety.

Findings:

There are no existing or planned public or private airports in Gresham. The City can support access to nearby airports for freight and passenger movement. This policy is unchanged in the new Transportation System Plan.

Conclusion: This policy is included in the new Transportation System Plan.

10.320.11 Pipeline System

Policy 1: Ensure that land uses in Gresham are compatible with established and planned pipeline corridors.

Findings:

Several pipelines cross the City providing important access to energy and fresh water. The City has development review steps in place to make sure new development does not interfere with these pipelines. This policy is unchanged in the new Transportation System Plan.

Conclusion: This policy is included in the new Transportation System Plan.

IV. APPLICABLE METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN TITLES

This section identifies the applicable Metro Urban Growth Management Functional Plan titles. The summary of the title is followed by corresponding findings and conclusions.

Title 8 Compliance Procedures

Section 3.07.820 of this title requires that at least 35 days prior to the first evidentiary hearing on an amendment to a comprehensive plan that the City submit the proposed amendments to Metro. Metro may review the amendments and can request that the City provide an analysis of compliance with the Functional Plan.

Findings:

Notice of the proposed amendments to Comprehensive Plan were sent to Metro on February 13, 2026; complying with the requirement to provide such notice at least 35 days before the first hearing on March 23, 2026. As of the date of this report Metro has not contacted the City regarding this notice.

Conclusion: The City has submitted the proposed amendments to Metro at least 35 days prior to the first evidentiary hearing. The proposal is consistent with Title 8 (Compliance Procedures). The proposed amendments comply with all the applicable Metro Urban Growth Management Functional Plan Titles.

V. APPLICABLE METRO REGIONAL TRANSPORTATION FUNCTION PLAN TITLES

Title 1: Transportation System Design

Title 2: Development And Update of Transportation System Plans

Title 3: Transportation Project Development

Title 4: Regional Parking Management

Title 5: Amendment of Comprehensive Plans

Title 6: Compliance Procedures

This section identifies the applicable Metro Regional Transportation Functional Plan titles. The summary of the title is followed by corresponding findings. The conclusion for all applicable title is at the end of this section.

Title 1: Transportation System Design

This title describes transportation system and street design that must be included in the City's Transportation System Plan. It requires a grid of arterial streets to serve regional travel and local connectivity planned in a logical and direct way. It requires transit system planning consistent with the Regional Transportation Plan and pedestrian connectivity between destinations and transit stops. The title also requires a Transportation System Plan to include a pedestrian and bicycle plan that evaluates pedestrian and bicycle access needs and future projects to reduce reliance on vehicles. Transportation System Plans are also required to include freight plans to assure access to industrial areas and a Transportation System Management and Operations plan to assist with traffic flow.

Findings:

The proposed Transportation System Plan has all of the required sections. There are plans for how to build the system, how streets should be constructed, networks for bicycle, pedestrian, and freight, and how the system can be managed to make traffic flow better and reduce demand by providing people with alternatives to vehicles.

Title 2: Development And Update of Transportation System Plans

This title describes what considerations must be included when updating a Transportation System Plan. This includes the forecast of population and employment, system maps in the Regional Transportation Plan, and the needs of youth, seniors, people with disabilities, minorities, and low-income families. It also requires consideration of different strategies to meet travel demand, such as multi-modal system improvements, and requires performance standards for intersections and planning for regional modal targets.

Findings:

The proposed amendments to the Transportation System Plan are focused on safety, equity, climate, and micromobility. The updated plan had extensive public engagement to bring in the voices of seniors, minorities, and low-income families. The population and employment projections are updated to be consistent with Gresham's Housing Needs Analysis and are compliant with Metro projections. The intersection standards remain the same from the past Transportation System Plan and are compliant with this title. The plan's sections on multi-modal system improvements will help to reach the regional modal targets.

Title 3: Transportation Project Development

This title describes planning for regional facilities in Transportation System Plans, including their identification and description for regional collaboration.

Findings:

The proposed amendments to the Transportation System Plan do not include any new regional facilities.

Title 4: Regional Parking Management

This title requires the City to have parking minimums and maximums near transit at specific low levels to encourage transit use. The City must also have regulations for parking lot size, pedestrian compatibility, bicycle parking standards, and parking policies in regional centers.

Findings:

The proposed amendments to the Transportation System Plan include a section on Parking Management and focus on the new Parking Management Manual for Downtown. The Manual relies on data and parking usage thresholds to determine which interventions are recommended. The options are consistent with the suggested actions in this title.

Title 5: Amendment of Comprehensive Plans

This title requires the City to consider certain transportation solutions when undertaking analysis of new transportation facilities that significantly increase single-occupant vehicle travel. It provides for alternatives in design and in demand reduction.

Findings:

The proposed amendments to the Transportation System Plan do not propose new street projects that would significantly increase single-occupant vehicle travel. The Transportation System Plan projects proposed for funding are mixed between vehicle projects, pedestrian projects, and bicycle projects.

Title 6: Compliance Procedures

This title requires that the City maintain a Transportation System Plan that is compliant with the Regional Transportation Functional Plan. All amendments to a Transportation System Plan must be sent to Metro at least 45 days prior to the first evidentiary hearing on an amendment. Metro may review the amendments and can request that the City provide an analysis of compliance with the Functional Plan.

Findings:

Notice of the proposed amendments to Comprehensive Plan were sent to Metro on February 13, 2026; at least 35 days before the first hearing on March 23, 2026. In past discussions Metro staff has indicated that 35 days is sufficient time to review proposed amendments, as that timeframe aligns with the Urban Growth Management Functional Plan review. As of the date of this report Metro has not contacted the City regarding this notice.

Conclusion: The proposed amendments to the Transportation System Plan are consistent with the applicable regional titles.

VI. APPLICABLE OREGON STATEWIDE PLANNING GOALS

Goal 1 Citizen Involvement

Goal 2 Land Use Planning

Goal 12 Transportation

This section identifies the applicable Oregon Statewide Planning Goals. The summary of the goal is followed by corresponding findings and conclusions.

Goal 1 - Citizen Involvement

This goal requires that cities “insures the opportunity for citizens to be involved in all phases of the planning process.”

Findings:

The public was informed of opportunities for involvement in the Transportation System Plan update through the City’s calendar, the project website, and emails to an interested parties sign-up list. The proposed plan had extensive public engagement to bring in the voices of seniors,

minorities, low-income families, and community members who speak English as a second language. See Section I of this report for a full list of public outreach activities.

Goal 2 - Land Use Planning

This goal requires cities to “establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.” The goal requires that “plans and actions related to land use shall be consistent with the comprehensive plans of cities and counties and regional plans adopted under ORS Chapter 268.”

Findings:

The City has a state-acknowledged Comprehensive Plan. Section III of this report describes findings and conclusions that the proposed Comprehensive Plan Amendments are consistent with applicable procedures and applicable goals and policies of the City’s Comprehensive Plan. In compliance with Goal 2, the proposed code amendments will be considered at a public hearing with opportunities for review and comment by residents and affected governmental units, including DLCD and Metro.

Goal 12 - Transportation

This goal requires cities “To provide and encourage a safe, convenient and economic transportation system.” The goal requires cities to maintain a Transportation System Plan that shall:

1. Consider all modes of transportation including mass transit, air, water, pipeline, rail, highway, bicycle and pedestrian;
2. Be based upon an inventory of local, regional and state transportation needs;
3. Consider the differences in social consequences that would result from utilizing differing combinations of transportation modes;
4. Avoid principal reliance upon any one mode of transportation;
5. Minimize adverse social, economic and environmental impacts and costs;
6. Conserve energy;
7. Meet the needs of the transportation disadvantaged by improving transportation services;
8. Facilitate the flow of goods and services so as to strengthen the local and regional economy; and
9. Conform with local and regional comprehensive land use plans.

Findings:

The proposed amendments to the Transportation System Plan considers all modes and inventories their needs and encourages different combinations of transportation modes. The City’s existing and planned streets provide for multi-modal travel, reducing reliance on a single mode. By providing transit and alternatives to vehicle travel the Transportation System Plan meets the needs of transportation disadvantaged populations and conserves energy. The plan considers freight and commercial access to strengthen the local economy. The Transportation

System Plan continues to conform to local and regional land use plans by connecting regional centers and planning connected streets.

Conclusion: The proposed amendments comply with all applicable Statewide Planning Goals.

VI. CONCLUSION

The proposed amendments to Volume 2 - Policies and Volume 4 - Transportation System Plan are consistent with all applicable procedures, goals and policies of the Community Development Plan, applicable Titles of the Metro Urban Growth Management Functional Plan, applicable titles of the Metro Transportation Functional Plan, and applicable Statewide Planning Goals as indicated by findings contained or referenced in this report.

VII. RECOMMENDATION

Staff recommends **adoption** of the proposed Comprehensive Plan text amendments, CPA-26-00021, as contained in the attached exhibits, based on the findings, conclusions, and recommendations in the March 13, 2026 staff report.

End of staff report