KITTELSON & ASSOCIATES
1001 SW Emkay Drive, Suite 140
Bend, OR 97702
P 541.312.8300

TECHNICAL MEMORANDUM

BEND MADE
A PLAN FOR TOMORROW, CRAFTED TODAY.

September 14, 2026 Project# 334360

To: Susanna Julber, Transportation Planner, City of Bend

From: Karen Swirsky, AICP, Matt Kittelson, PE, and Eza Andrews, PE

RE: How Bend's Existing TSP Compares to New State Transportation Requirements

***Note to City Council: This memorandum provides an overview of a review of the current Bend Transportation System Plan (TSP) compared to the new Climate Friendly and Equitable Community (CFEC) rules. A high-level overview of this content will be shared at the September 14th Council Workshop.***

***As you review, consider the following question:***

- ***If Bend keeps growing under the current rules and trends, what do you like about where that's headed – and what concerns you?***

In 2020, when the Bend TSP was adopted, OAR 660-012 (commonly known as the Transportation Planning Rule or TPR) focused on statewide transportation planning coordination, holding increases in vehicle miles traveled (VMT) to a target of less than 5% increase per capita over 2003 levels per, providing for more transportation options, land-use integration, and basic performance measures. Since that time, the State has amended Division 44 (OAR 660-044-0035) to establish Greenhouse Gas (GHG) reduction targets and has strengthened the connections between land use, transportation planning, and GHG reductions. This led to changes in the TPR that target a reduction in VMT, since it is widely recognized that motor vehicle travel is a major contributor to GHG production.

Therefore, in 2026, while the factors used to guide development of the 2020 TSP are still relevant, the rules have added a stronger emphasis on the link between land use planning and trip reduction (climate-friendly development, focusing on mixing land uses), equity, transportation inventories, and detailed performance measure reporting requirements. The City of Bend has begun a multi-year effort to update its Comprehensive Plan, which includes an update to the 2020 TSP, bringing the planning horizon from 2040 to 2050. This revision will also include focused updates based on the changes to the TPR that the state has implemented since the Bend TSP was adopted.

The following table compares the 2020 Bend TSP with TPR requirements that are new since the TSP was adopted in 2020 and provides recommendations the City may use to incorporate the new TPR requirements into the updated TSP.

| New TPR requirement | 2020 Bend TSP | Recommendation |
|---|---|---|
| Requires a strong **equity** approach to transportation planning, including a Major Equity Analysis and directed outreach to underserved populations (OAR 660-012-0135). | Bend TSP included some directed outreach in a workshop format. The TSP includes a definition of Equity as well as Policies 19-21, which directs the City to approach transportation planning, prioritization and programs and projects, and funding with an equity-based approach. | The existing TSP provides a policy foundation for equity, which will be strongly enhanced and clarified by the Major Equity Analysis and equity-based outreach required by the new rules. Refinement and expansion of the existing policies is a likely outcome of this work. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
|---|---|---|
| Requires communities in MPOs to identify **Climate Friendly Areas (CFAs)**, (OAR 660-012-0315) areas with higher densities, mixed uses, and a strong emphasis on multimodal transportation -- particularly walking, bicycling, and transit use. The Rule requires the CFAs to accommodate at least 30% of the housing units identified by the city's Housing Needs Analysis. | A concept similar to CFAs was developed by Bend for the 2016 Urban Growth Boundary (UGB) expansion work completed prior to the 2020 TSP. The UGB work included the creation of Opportunity Areas. These were areas of the City that were identified as having the capacity for redevelopment. The Opportunity Areas were factored into the transportation modeling that was completed for the TSP and aided the City in meeting the requirement for not increasing per capita VMT more than 5% over 2003 levels. | The City completed its Climate Friendly Areas Study in December 2023, as required by the Rule. Some of the candidate CFA boundaries are based on the 2016 UGB Opportunity Areas, with deeper analysis and evaluation. The concept of identifying areas for increased levels of development, including mixed use and higher rise multifamily and the potential for this type of development to reduce trips is therefore not new to Bend. The revised TSP will take this to the next level with the update of the Housing Needs Analysis, formalization of CFAs and other land use efficiency measures, and subsequent updates to the transportation model. It is anticipated that a much more detailed approach to infrastructure planning, particularly for modes other than motor vehicle use, will be a part of the revised TSP than was previously accomplished. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
|---|---|---|
| Requires much more extensive **inventories of pedestrian and bicycle facilitie**s than previously (OAR 660-012-0505 and 0605). | The 2020 TSP was able to access a relatively recent and complete inventory of Low Stress Bicycle facilities; however, an equivalent pedestrian inventory did not exist. The City opted to use "presence/absence" data for arterials and collectors to identify gaps and to create a number of cross-town routes, termed Key Routes, for both pedestrians and bicyclists. These cross-town routes were incorporated into the 2020 General Obligation Bond program, and several are under construction.<br><br>In 2023, as a follow-up to the TSP, the City completed a Pedestrian Implementation Plan that used an equity approach to identify, inventory, and create a project list for 10 areas of the City where pedestrian facilities were the most needed. This Plan was intended to be a supplement to the TSP; however, it was not formally adopted by the City. | The Oregon Department of Transportation (ODOT) has provided the City inventory data for bicycle and pedestrian facilities. Based on preliminary examination of this data, more on-the-ground inventory work to identify gaps and inadequate infrastructure is likely to be needed for the revision to the TSP. While this approach will meet the regulatory requirements of the new TPR, the City may decide to further expand the pedestrian and bicycle inventory through implementation of the updated TSP. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
|---|---|---|
| Requires extensive **parking management** (OAR 660-012-0400 to 0450), including the removal or reduction of parking mandates, and developing more climate-friendly off-street parking, with an emphasis on CFAs and transit corridors. | As part of the TSP, Policies 36-38 considered parking management, allowing parking districts, and implementing the 2017 Downtown Parking Plan. | The City has already amended its codes to implement the parking requirements of the new TPR by eliminating minimum parking requirements in all zones (City of Bend Development Code 3.3 – Vehicle Parking, Loading, and Bicycle Parking). Future updates will need to evaluate how to and where to implement parking pricing. |
| Requires a formal process for identifying and reporting on **Performance Measures and Targets** (OAR 660-012-0905 to 0915). Jurisdictions must identify at least two performance standards (OAR 660-012-0215) to monitor to support progress towards meeting the specific targets. | The 2020 TSP included a chapter called Implementation and Performance Monitoring (Chapter 7). It provided an overview of how the projects and programs in the TSP would be implemented and monitored. The performance monitoring targets and measures identified were formulated based on the TSP goals and policies. They were intentionally chosen because they represent each of the specific policy areas and goals and were based on the best data available at the time this TSP was adopted. | The Performance Measures from the 2020 TSP overlap to some extent with the suggested Performance Standards of the TPR; in particular, Safety, Environment, Mobility, and Connectivity. Most of these Measures from the 2020 TSP were associated with a measurement target. These measures and targets could be used as a starting point for the revised TSP. Updates to illustrate how performance measures are presented and monitored within the updated TSP will be a significant change. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
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| A greater emphasis on identifying "**key destinations**" (OAR 660-012-0360) where a higher than average rate of pedestrian, bicycle, or transit trips occur. Key destinations are an important piece of the new TPR requirements and providing safe and convenient connections to the key destinations are required and will be measured via the Performance Targets. | Modeling for the 2020 TSP recognized area of employment, housing, and open space, mainly based on existing zoning. The 2020 TSP also considered the projected levels of development for the Opportunity Areas, transit routes, and other factors. | The new TPR rules require designation of key destinations, and the City has some latitude to choose which key destinations make sense for the community. OAR 660-012-360 provides a list of potential designations, including some individual land uses such as day care (which could be a single use within a residential zone), gyms (often a single use within a commercial or industrial zone), schools, and relatively ephemeral activities such as farmers markets. The emphasis is on CFAs, but other key destinations must also be identified and designated as part of the TSP update. The City will be required to meet these requirements prior to the TSP update in association with analyzing and eventually adopting a preferred land use scenario to meet Bend's 20-year land needs. Notably, the City's approach to Community Impact for the project has already started the identification of key destinations as assets to stratify Division 8 CHNA requirements. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
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| Requires a major TSP update to demonstrate a **reduction in vehicle miles traveled (VMT) per capita**. A city or county may adopt the TSP only if projected horizon-year VMT per capita, using the financially constrained project list, is lower than base-year VMT per capita (OAR 660-012-0160(4)). This requirement does not apply when the financially constrained project list does not contain a project requiring enhanced review under OAR 660-012-0830(1) (OAR 660-012-0160(5)).<br><br>Bend's target is an 11% reduction from baseline conditions. | The 2020 TSP was developed under the prior standard, which sought to limit the increase in per capita VMT to less than 5% above 2003 levels. | As part of the updated TSP, the City will compare base-year and horizon-year VMT per capita using the financially constrained project list. The City currently expects that projects that require enhanced review could be included in the updated TSP. Because of this likelihood, the TSP work program should closely consider the VMT outcomes of land use and transportation scenarios. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
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| Requires **enhanced review of select roadway projects** before they may be included as planned or unconstrained projects in a comprehensive plan or TSP (OAR 660-012-0830). Covered projects include certain new or extended arterials, highways, freeways, or bridges; new or expanded interchanges; additional general-purpose travel lanes; and auxiliary lanes one-half mile or longer, subject to the exemptions and carry-forward provisions in the rule. | The current TSP includes projects that would likely require enhanced review under the updated rules. These include projects such as the potential for additional vehicular capacity along Colorado Avenue and 27th Street. | Screen the updated TSP project list early for applicability under OAR 660-012-0830 and establish the required process for documenting the transportation need, evaluating alternatives and impacts, coordinating with affected jurisdictions, engaging the public, and authorizing applicable projects. |

| New TPR requirement | 2020 Bend TSP | Recommendation |
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| The TPR (OAR 660-012-0900) now requires detailed **reporting** of progress towards achieving progress towards meeting the requirements of Division 44 (OAR 660-044, Metropolitan Greenhouse Gas Reduction Target Rules) as well as the Performance Measures and Targets created to meet the requirements of OAR 660-012-0905 to 0915. | The requirement for cities to document and report on progress towards meeting the targets established by the state for each of the Performance Measures provided in OAR 660-012-0905 is new since the 2020 TSP was adopted. | The City worked with ODOT and DLCD to create a process for documenting and reporting progress towards meeting its targets prescribed by the State. The City is required, with the updated TSP, and in each subsequent TSP or MTP update, to document its progress towards meeting its targets. The City's first Major Report, which set baselines and targets to 2050 for each Performance Measure is linked here. This will require changes to internal city processes, data collection, and reporting across multiple departments, including Transportation and Mobility, Engineering, and Office of Performance Management. |