

# Draft Memo #1 Review of Adopted Plans, Rules, Policy, and Regulations



July 1, 2024 Project# 27003.12  
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Glen Bolen and Molly McCormick; Oregon Department of Transportation  
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RE: Gresham TSP 2045 Update

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## Introduction

This memorandum overviews existing local, regional, and statewide policies, standards, and rulemaking in order to inform potential updates and gaps in existing City of Gresham policy. The existing policies and identified gaps will support conversations surrounding policy and priority updates in the Gresham TSP 2045 Update. In addition to this review, policy updates will be informed by conversations with the Project Management Team (PMT), Technical Advisory Committee (TAC), Stakeholder Advisory Committee (SAC), policy focus group participants, and key themes from community outreach.

# Background

City to populate.

## Plan and Policy Review

Existing plans and policies reviewed and shown below include:

- City of Gresham Comprehensive Plan
- City of Gresham 2013 Transportation System Plan (TSP)
- City of Gresham Active Transportation Plan (ATP)
- City of Gresham Public Works Standards
- City of Gresham Climate Action Plan
- Metro 2023 Regional Transportation Plan
- Metro Regional Mobility Policy
- TPR Amendments from the Climate Friendly and Equitable Communities rulemaking

### City of Gresham Comprehensive Plan

City of Gresham Comprehensive Plan was last updated in August 2023. This document guides growth and development in Gresham by identifying the City's goals and establishing policies to regulate land use, transportation, utilities, recreation, housing, environmental, and other areas of City oversight. **Volume 2, section 10.320 - Transportation System** of the City of Gresham Comprehensive Plan establishes the policies, action measures, and implementation strategies for the transportation network. The goals and policies are shown below and largely align to the overall TSP goals and policies, shown in the subsequent section of this document, with the exception of the bicycle and pedestrian systems which were updated with the ATP. The policies shown here are updated with the ATP language, and the ATP is described further in this document.

#### Transportation Goals:

- Ensure the transportation system provides a safe, secure, and attractive travel experience that supports livability and community interaction.
- Ensure access and mobility by increasing multimodal travel options and providing a continuous, interconnected transportation system.
- 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.

#### Transportation Policies:

- **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.

The Comprehensive Plan is further divided into sub-sections, each with their own policies, shown below.

- Street System
  - Provide a street system that accommodates a variety of travel options.
  - Develop a street system that meets current needs and anticipated future population growth and development.
  - Provide a street system that maximizes accessibility and mobility within the community.
  - Ensure a street system that is safe and supports healthy, active living.
- Transit System
  - Advocate for convenient, expanded transit service within Gresham and the east Multnomah County area.
  - Encourage efficient transit services to meet the current and projected transportation needs of the citizens of Gresham.
  - Promote the development of a transit system that maximizes accessibility.
  - Assist in the development of a safe transit system.
- Bicycle System
  - Develop a bicycle network that is easy to use, continuous, connected, and equitable.
  - Increase bicycle safety on the bicycle network through infrastructure improvements and safety programs.
  - Create a bicycle network to encourage and support physical and mental health
- Pedestrian System
  - Provide a pedestrian network that is easy to use, continuous, attractive, accessible for all users, and equitable.
  - Improve pedestrian access to important destinations, such as stores that sell healthy food, jobs, schools, parks, natural areas, commercial areas and transit stops.
  - Increase pedestrian safety on the pedestrian network through infrastructure improvements and safety programs.
  - Create a walking network that encourages physical and mental health.
- Transportation Demand Management
  - Implement transportation demand management 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.
- Transportation System Management Operations/Intelligent Transportation Systems
  - 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.
- Parking Management
  - 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.
- Truck And Rail Freight System

- Provide for the safe and efficient movement of truck and rail freight through and within Gresham.
- Passenger Rail
  - Support federal, state, regional and private investments in passenger rail service to the metropolitan area.
- Air Transportation System
  - Ensure that land uses in Gresham are compatible with aircraft noise exposure and aircraft safety.
- Pipeline System
  - Ensure that land uses in Gresham are compatible with established and planned pipeline corridors.

## City of Gresham 2013 TSP

The 2013 City of Gresham Transportation System Plan (TSP) is a blueprint for biking, walking, driving and transit through 2035. It includes several chapters that cover the guiding tenets, existing and future conditions analysis, policies and action measures, funding forecasts, and future project lists. The main goals of the TSP include providing or advancing:

- Healthy and active transportation options
- Safe and efficient transportation system
- Economic development
- Well-connected, multi-modal system
- Reduced greenhouse gas emissions and increased environmental stewardship.

The TSP has 2 chapters dedicated to the governing policies and concepts the TSP follows: Chapter 1: Guiding Tenets and Planning Framework and Chapter 4: Policies and Action Measures. Chapter 1 establishes guiding principles and goals of the overall TSP, shown below. Chapter 4's goals and policies are identical to the Comprehensive Plan, with the exception of the bicycle and pedestrian systems which were updated with the ATP.

### Guiding Principles:

- Ensure the transportation system provides a safe, secure and attractive travel experience that supports livability and community interaction.
- Ensure access and mobility by increasing multimodal travel options and providing a continuous, interconnected transportation system.
- 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.

### Goals:

- Accessibility – The ability to reach desired goods, services, activities and destinations with relative ease, within a reasonable time, at a reasonable cost and with reasonable choices.
- Economic Development – Constructing and maintaining a transportation system that supports new business as well as business retention, expansion and relocation.
- Efficiency – Constructing and maintaining a transportation system that performs and functions as fluidly as possible.

- Environmental Stewardship – Meeting the needs of the present generation without compromising future needs and resources
- Healthy Equity – Promoting health with adequate biking and walking routes and trails among all transportation system users
- Livability – Tying the quality and location of transportation facilities to broader opportunities such as access to good jobs, affordable housing, quality schools and safe streets.
- Mobility – The ability to move people and goods to destinations efficiently and reliably.
- Safety – Minimizing dangers or risks in the transportation system so users feel safe driving, biking, walking and taking transit.
- Sustainable Funding – Ensuring the establishment of funding mechanisms sufficient to support the continuous and safe operation of the transportation system.

## City of Gresham ATP

The City of Gresham created its first Active Transportation Plan (ATP) in 2018. Building off the vision and goals of the TSP, the ATP is intended to be used as a road map for defining where and how the City of Gresham will enhance walking and biking.

The ATP has a list of updated policies for biking and walking which were later adopted into the Transportation System Plan.

- Increase safety for people walking and biking in Gresham.
- Create pedestrian and cycling networks that are continuous, easy to use, attractive, and convenient.
- Connect people to important destinations, such as stores that sell healthy food, jobs, schools, parks, natural areas, commercial areas and transit stops.
- Create walking and biking networks that encourage physical activity, social connections, and positive interactions among people.
- Promote health through connections to healthy food stores and opportunities for physical activity.
- Educate all users of Gresham’s transportation systems about the benefits of walking and biking.
- Identify projects that provide walking and biking benefits in a cost-effective manner.
- Increase economic opportunity by making it easier for people to use low-cost, human powered ways to get to work.
- Increase mobility and accessibility for underserved communities by ensuring the bicycle and pedestrian network is improved through equitable investments in infrastructure and programs.
- Ensure pedestrian and bicycle infrastructure is accessible and addresses the needs of everyone who uses it, including youth, seniors, and people of all abilities, races, ethnicities and incomes.

## City of Gresham Public Works Standards

The City of Gresham Public Works updated their standards document in January 2024. Gresham’s Public Works Standards is the regulatory document used by the City and private developers to design and construct public infrastructure, including roads, water pipes and sewer pipes.

Chapter 600 – Standard details – Transportation Technical Requirements documents information about the standards related to all transportation elements. It includes information regarding standards to be followed for each type of street functional classification. All streets within the City are classified as noted in the TSP. The Public Works Standards show which streets need to follow what standards and shows typical

sections for each type. The standards also provide regulations on roadway depth, materials used, right-of-way widths, design speeds, street improvement requirements, typical grades and materials. Streets with unique cross-sections are called out in both the TSP and the Public Works Standards.

## City of Gresham Climate Action Plan

The Gresham Climate Action Plan was adopted in 2024. The mission of the plan is to foster a safe, thriving, and welcoming community for all, and its vision is to promote Gresham as a vibrant, inclusive, and resilient community where everyone can share in economic prosperity, enjoy connection and belonging, and live a high-quality life. The plan includes a study of existing trends and of future projections with respect to local climate and weather patterns, environmental quality, and carbon emissions. It explores public outreach and looks at climate through an equitable lens.

In short, this plan includes a study that assesses how Gresham will be directly affected by climate change and what those impacts will look like. It includes six core focus areas with goals for each of these areas. They are listed as follows:

- Buildings and Energy
  - Goal 1- Increase the supply of renewable energy to the community.
  - Goal 2 - Expand participation in energy demand response programs, as capacity becomes available.
  - Goal 3 - Support the development of community-scale renewable energy micro-grid projects with battery storage.
  - Goal 4 - Support increased access to energy efficiency and weatherization in all building types and property uses.
  - Goal 5 - Develop a green buildings framework to incentivize higher standards of energy efficiency, emissions performance, and embodied carbon in new developments.
  - Goal 6 - develop an information hub for incentives and permitting for renewable energy projects to streamline permitting requirements and process.
  - Goal 7 - adopt a residential energy score.
- Urban Form and Transportation
  - Goal 1- Integrate a climate resilience and climate equity approach to all updates to the comprehensive plan.
  - Goal 2- Support dense, mixed-use developments near frequent transit through implementation of climate friendly and equitable communities' rules, middle housing rules, and Gresham's housing production strategy.
  - Goal 3- Review public works standards to support climate resilience in the development of new infrastructure and capital improvement projects.
  - Goal 4- Integrate a climate resilience and climate equity approach into the transportation system plan.
  - Goal 5- Develop a community engagement campaign to support active transportation and transit options.
  - Goal 6- Consider code to require all new developments to be EV-ready.
  - Goal 7- Support the development of electric-vehicle charging hubs in high-traffic community destinations.

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- Goal 8- Develop an information hub for incentives and permitting for electric vehicle charging projects to streamline permitting requirements and process.
  - Solid Waste and Consumption
    - Goal 1- Conduct food waste prevention outreach to the community to divert organic waste from landfills.
    - Goal 2- Support visibility and access to food access, security, and donation services.
    - Goal 3- Implement commercial food scrap collection requirement.
    - Goal 4- Develop a strategy to expand food scrap collection and composting services to residential solid waste service customers.
    - Goal 5- Implement green business program.
    - Goal 6- Support implementation of Oregon recycling modernization act.
    - Goal 7- Expand recovery of construction and demolition materials.
    - Goal 8- Support the visibility and access to repair and reuse services.
    - Goal 9- Support the establishment of tool share and library services in Gresham.
    - Goal 10- Support the use of durable to-go food ware and containers.
  - Community Health and Economic Resilience
    - Goal 1- Support the development of an early warning and outreach system for extreme weather and climate hazards.
    - Goal 2- Develop and implement a community heat strategy.
    - Goal 3- Develop community chipping events to increase accessibility to debris management after severe storms.
    - Goal 4- Support the development of resilience hubs that host emergency services and supply Goal 5- distribution during hazardous conditions.
    - Increase access to weatherization materials and resources to support the community's ability to shelter-in-place during hazardous conditions.
    - Goal 6- Support food access and security services during hazardous conditions.
    - Goal 7- Support workforce development opportunities in climate resilience and green infrastructure projects.
  - Natural and Built Environment
    - Goal 1- Maintain and improve tree canopy in neighborhoods with low tree canopy coverage.
    - Goal 2- Update city tree code and policies to support climate-informed management of trees and urban canopy.
    - Goal 3- Consider recognizing city parks and natural spaces as essential green infrastructure to access funding options for nature-based solutions.
    - Goal 4- Support the use of permeable materials when replacing impermeable surfaces.
    - Goal 5- Assess all city culverts to identify vulnerabilities to flooding and washouts during severe storms.
    - Goal 6- Support the development of a network of community air quality monitors.
  - Internal City Operations
    - Goal 1- Supply city buildings with 100% renewable energy.
    - Goal 2- Achieve 100% zero onsite emissions in city buildings and operations.
    - Goal 3- Use strategic energy management in city buildings.

- Goal 4- Pursue grant funding to increase onsite energy generation at wastewater treatment plants through added capacity in anaerobic digestion and biogas cogeneration.

## Metro 2023 Regional Transportation Plan

The Metro 2023 Regional Transportation Plan identifies urgent and long-term transportation needs and investments to meet the needs of the greater Portland Metropolitan area over the next 20 years. This plan is updated every five years with input from community members, business and community leaders and governments.

The plan outlines five goal areas where each goal area is followed by objectives to identify a measurable desired outcome and means for achieving the goal followed by key performance measures. The goals and corresponding objectives outlined in the RTP include:

- **Goal 1: Mobility Options-** People and businesses can reach the jobs, goods, services, and opportunities they need by well-connected, low-carbon travel options that are safe, affordable, convenient, reliable, efficient, accessible, and welcoming.
  - Objective 1.1 Travel Options – Plan communities and design and manage the transportation system to increase the proportion of trips made by walking, bicycling, shared rides and use of transit, and reduce per capita vehicle miles traveled.
  - Objective 1.2 System Completion – Complete all gaps in planned regional networks.
  - Objective 1.3 Access to Transit – Increase household and job access to current and planned frequent transit service.
  - Objective 1.4 Regional Mobility – Maintain reliable person-trip and freight mobility for all modes in the region’s mobility corridors, consistent with the designated modal functions of each facility and planned transit service within each corridor.
- **Goal 2: Safe System-** Traffic deaths and serious crashes are eliminated, and all people are safe and secure when traveling in the region.
  - Objective 2.1 Vision Zero – Eliminate fatal and severe injury crashes for all modes of travel by 2035.
  - Objective 2.2 Transportation Security – Reduce the vulnerability of travelers and critical passenger and freight transportation infrastructure to crime and terrorism.
- **Goal 3: Equitable Transportation-** Transportation system disparities experienced by Black, Indigenous and people of color and people with low incomes, are eliminated. The disproportionate barriers people of color, people who speak limited English, people with low incomes, people with disabilities, older adults, youth and other marginalized communities face in meeting their travel needs are removed.
  - Objective 3.1 Transportation Equity – Eliminate disparities related to access, safety, affordability, and health outcomes experienced by people of color and other marginalized communities.
  - Objective 3.2 Barrier Free Transportation – Eliminate barriers that people of color, low-income people, youth, older adults, people with disabilities and other marginalized communities face to meeting their travel needs.



- **Goal 4: Thriving Economy**- Centers, ports, industrial areas, employment areas, and other regional destinations are accessible through a variety of multimodal connections that help people, communities, and businesses thrive and prosper.
  - Objective 4.1 Connected Region – Focus growth and transportation investment in designated 2040 growth areas to build an integrated system of throughways, arterial streets, freight routes and intermodal facilities, transit services and bicycle and pedestrian facilities, with efficient connections between modes and communities that provide access to jobs, markets and community places within and beyond the region.
  - Objective 4.2 Access to Industry and Freight Intermodal Facilities – Maintain access to industry and freight intermodal facilities by a reliable and seamless freight transportation system that includes air cargo, pipeline, trucking, rail, and marine services to facilitate efficient and competitive shipping choices for goods movement in, to and from the region.
  - Objective 4.3 Access to Jobs and Talent – Attract new businesses and family-wage jobs and retain those that are already located in the region while increasing the number and variety of jobs that households can reach within a reasonable travel time.
  - Objective 4.4 Transportation and Housing Affordability – Reduce the share of income that households in the region spend on transportation to lower overall household spending on transportation and housing.
- **Goal 5: Climate Action and Resilience**- People, communities and ecosystems are protected, healthier and more resilient and carbon emissions and other pollution are substantially reduced as more people travel by transit, walking and bicycling and people travel shorter distances to get where they need to go.
  - Objective 5.1 Climate Change Mitigation – Meet adopted targets for reducing transportation-related greenhouse gas emissions and vehicle miles traveled per capita in order to slow climate change.
  - Objective 5.2 Climate-Friendly Communities – Increase the share of jobs and households in walkable, mixed-use areas served by current and planned frequent transit service.
  - Objective 5.3 Resource Conservation – Preserve and protect the region’s biological, water, historic, and culturally important plants, habitats, and landscapes.
  - Objective 5.4 Green Infrastructure – Integrate green infrastructure strategies to maintain habitat connectivity, reduce stormwater run-off, and reduce light pollution.
  - Objective 5.5 Adaptation and Resilience – Increase the resilience of communities and regional transportation infrastructure to the effects of climate change and natural hazards, helping to minimize risks for communities.

## Metro Regional Mobility Policy

The Regional Mobility Policy had significant updates in the 2023 Metro’s Regional Transportation Plan (RTP). Updates to the mobility policy measures and their applications still needs to be incorporated into the Metro Regional Transportation Functional Plan (RTFP) as well as ODOT’s Oregon Highway Plan (OHP). It applies to system planning and plan amendment processes only within the Portland metropolitan area. The regional mobility policy is one of many policies that helps the region choose where to focus resources and how to manage the transportation system today and into the future. The goal of this updated policy is to better align the policy and measures with shared regional values, goals, and desired outcomes identified in the RTP and 2040 Growth Concept, as well as with local and state goals. Specifically, the

updated policy is intended to support mobility outcomes related to equity, efficiency, access and options, safety, and reliability. Six policies and three measures are included in the policy that have direct relationships to these desired mobility outcomes.

#### Draft Regional Mobility Policy for the 2023 Regional Transportation Plan

- Mobility Policy 1: Ensure that land use decisions and investments in the transportation system enhance efficiency in how people and goods travel to where they need to go.
- Mobility Policy 2: Provide people and businesses a variety of seamless and well-connected travel modes and services that increase connectivity, increase choices and access to low carbon transportation options so that people and businesses can conveniently and affordably reach the goods, services, places and opportunities they need to thrive.
- Mobility Policy 3: Create a reliable transportation system that people and businesses can count on to reach destinations in a predictable and reasonable amount of time.
- Mobility Policy 4: Prioritize the safety and comfort of travelers by all modes when planning and implementing mobility solutions.
- Mobility Policy 5: Prioritize investments that ensure that Black, Indigenous and people of color (BIPOC) community members and people with low incomes, youth, older adults, people living with disabilities and other marginalized and underserved populations have equitable access to safe, reliable, affordable and convenient travel choices that connect to key destinations.
- Mobility Policy 6: Use mobility performance measures and targets that have direct for system planning and evaluating the impacts of plan amendments including Vehicle Miles Traveled (VMT) per capita for home-based trips and VMT/employee for commute trips to/from work, system completeness, and hours of congestion on the throughways.

Related to these policies, the Regional Mobility Policy identifies VMT per capita, system completeness, and hours of congestion on throughways as performance measures and targets.

## **TPR Amendments from the Climate Friendly and Equitable Communities rulemaking**

The Department of Land Conservation and Development (DLCD) significantly updated Oregon Administrative Rules (OARs) through the Climate-Friendly and Equitable Communities (CFEC) rulemaking. The changes are to OAR 660 Division 12, also known as the Transportation Planning Rule (TPR), primarily focused on the eight metropolitan regions in Oregon – Albany Area, Bend Area, Central Lane (Eugene-Springfield), Corvallis Area, Middle Rogue, Rogue Valley, Salem-Keizer, and Portland Metro. In response to the CFEC rulemaking, a CFEC program has been created to help implement the requirements and reach the key desired outcomes of:

- Meeting legislative climate policy and goals, including monitoring and reporting progress over time
- Increasing housing and employment options
- Fostering vibrant downtowns and neighborhood centers
- Improving transportation choices and infrastructure for electric vehicle charging
- Creating connected, safe, and complete networks
- Promoting equitable outcomes
- Prioritizing transportation investments in climate-friendly areas (CFAs), in neighborhoods with underserved populations, and to create access to key destinations

To reach these desired outcomes, [OAR 660-012](#) was modified with six edited sections, one deleted section, and 64 new sections. The new requirements are primarily found in the new sections and fall into several categories:

- Long-range planning requirements (OAR Sections 660-012-0100 to -0115, -0140 to -0215, -0500 to -0820)
- Outreach and equity analysis requirements (OAR Sections 660-012-0120 to -0135)
- Land use planning requirements, including climate-friendly areas (CFAs), parking reform, and electric vehicle (EV) charging (OAR Sections 660-012-0300 to -0450)
- Enhanced Review of Select Roadway Projects (OAR Sections 660-012-0830)
- Reporting requirements (OAR Sections 660-012-0900 to -0920)

Some of the more significant impacts to TSPs include the need for enhanced review of capacity increasing projects, the need to demonstrate VMT/capita reduction if the TSP includes capacity increasing projects, and the need to adopt two performance standards, one of which must help reduce reliance on single-occupancy vehicle travel. Transportation system plans need to be updated to reflect these new rules by December 31, 2029, and therefore the City of Gresham 2045 TSP Update should incorporate and reflect as much of the rulemaking surrounding equity, CFAs, parking, EV charging, and other components of CFEC as applicable.

Due to the scope and budget constraints of this project, which was funded by ODOT prior to the CFEC rules being implemented, full consistency with the TPR amendments is unlikely with this TSP update. Additional data collection will be needed to fully comply with the current TPR requirements related to inventories for each mode. In addition, the city is required to adopt the performance measures and targets Metro's Climate Smart Strategy (RTP Appendix J). Metro has established these for the region but needs to establish them for local jurisdictions. This may occur outside the timeframe of this TSP update. . Therefore, an additional update of the TSP may be necessary prior to December 31, 2029, to fully comply.

## Identified Gaps and Key Themes

This review of the adopted plans relevant to transportation reveals several missing elements in the TSP based on recent industry best practices, or those that are needed to bring the City of Gresham into compliance with the updated TPR and integrate more recent city planning documents. Briefly, these fall into the categories as follows:

- Safety
  - Safety is a consistent theme throughout all of the documents; however, there is no mention of a Vision Zero or similar policy, which would indicate a goal of no deaths or serious injuries related to transportation.
  - There is not a "complete streets" policy, which would state that all streets in the City are intended and designed to accommodate all modes of travel unless otherwise noted. Though all of Gresham's standard cross-sections accommodate all modes of travel.
  - The City aims to include buffered bike lanes on all arterials. This could be codified into the Public Work Standards and tied into policies.
- Climate Change

- There are no mentions in any of the documents of the overall need to reduce VMT per capita in order to reduce greenhouse gas emissions from transportation. See also Micromobility, below.
- There are no mentions of accommodating electric vehicles.
- There are no mentions of other related climate change reduction tools such as shading, runoff management, etc.
- Equity
  - Both the 2013 TSP and the 2018 ATP include health equity as a goal. The ATP also includes the goal of "increasing mobility and accessibility for underserved communities by ensuring the *bicycle and pedestrian* network is improved through equitable investments in infrastructure and programs."
  - A broader policy on equity in transportation is missing – one that recognizes the need to identify and include both transportation underserved and overburdened populations in outreach, planning, and funding infrastructure and programs.
- Micromobility/Curb Management/New Technologies
  - The existing documents include several mentions of ensuring access and mobility by increasing multimodal travel options; however, there are a number of missing elements, including policies on:
    - Micromobility (last mile traveled modes – i.e. e-scooters and e-bikes).
    - Mobility hubs;
    - Curb management; and
    - Technology.
- Parking
  - There is mention of parking management, but parking codes and policies will need to be reviewed in context of CFEC rulemaking regarding parking minimums and maximums, parking mandates near frequent transit corridors, EV charging (as noted under climate change), etc. The City is creating a Parking Management Manual that will make action toward addressing CFEC rulemaking, to be complete Winter 2025. This manual will be incorporated into the TSP.

## Next Steps

This draft memorandum will be reviewed with the PMT, TAC, and SAC and revised with their feedback. The existing policies and identified gaps will support conversations surrounding policy and priority updates in the Gresham TSP 2045 Update.