

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING A) RESOLUTION NO. 80-147
CONTINUANCE OF THE CITY OF)
TUALATIN'S REQUEST FOR ACKNOWL-) Introduced by the
EDGMENT OF COMPLIANCE WITH THE) Regional Planning Committee,
LCDC GOALS) Donna Stuhr, Chairman

WHEREAS, Metro is the designated planning coordination body under ORS 197.765; and

WHEREAS, Under ORS 197.255 the Council is required to advise LCDC and local jurisdictions preparing comprehensive plans whether or not such plans are in conformity with the Statewide Planning Goals; and

WHEREAS, The city of Tualatin is now requesting that LCDC acknowledge its Comprehensive Plan as complying with the Statewide Planning Goals; and

WHEREAS, LCDC Goal #2 requires that local land use plans be consistent with regional plans; and

WHEREAS, Tualatin's Comprehensive Plan has been evaluated for compliance with LCDC goals and regional plans adopted by CRAG or Metro prior to April, 1980, in accordance with the criteria and procedures contained in the "Metro Plan Review Manual" as summarized in the staff report attached as Exhibit "A" and "D"; and

WHEREAS, Metro finds that Tualatin's Comprehensive Plan does not comply with Goals #2, #7, #11 and #14; now, therefore,

BE IT RESOLVED,

1. That the Metro Council recommends to LCDC that Tualatin's request for compliance acknowledgment be continued to correct deficiencies under Goals #2, #7, #11 and #14, as identified in Exhibit "A."

2. That the Executive Officer forward copies of this Resolution and staff report attached hereto as Exhibits "A" and "D" to LCDC, city of Tualatin and to the appropriate agencies.

3. That, subsequent to adoption by the Council of any goals and objectives or functional plans after April, 1980, the Council will again review Tualatin's plan for consistency with regional plans and notify the city of Tualatin of any changes that may be needed at that time.

ADOPTED by the Council of the Metropolitan Service District
this 22nd day of May, 1980.


Presiding Officer

MB:bk
8099/118

APPROVED BY THE METRO COUNCIL

THIS 22nd DAY OF May 1980

A G E N D A M A N A G E M E N T S U M M A R Y

Res 80-147

Cynthia M. Richardson
 CLERK OF THE COUNCIL

TO: Metro Council
 FROM: Executive Officer
 SUBJECT: Recommending a Continuance of the City of Tualatin's Request for Acknowledgment of Compliance with the LCDC Goals

I. RECOMMENDATIONS:

- A. ACTION REQUESTED: Adoption of the attached Resolution recommending that LCDC grant a continuance of the city of Tualatin's request for compliance. The Council should act on this item at its May 22 meeting in order to ensure that its recommendation is considered by LCDC (see background).
- B. POLICY IMPACT: This is the first Metro acknowledgment recommendation that gives special attention to regional compliance issues consistent with the regional criteria and procedures contained in the Metro Plan Review Manual. In regard to other goal requirements, the Metro draft review is heavily relied upon. This will help establish a basis for future acknowledgment review procedures and Metro Council action on compliance acknowledgment requests.
- C. BUDGET IMPACT: None

II. ANALYSIS:

- A. BACKGROUND: The city of Tualatin adopted their comprehensive plan in October, 1979. The plan "package" submitted for acknowledgment includes "Technical Memoranda" (inventories and background information) a "Community Development Code" (policies and implementing measures) and other supporting documents.

Metro conducted a draft review of the City's plan in September, 1979, and identifies a number of deficiencies (see Exhibit "D"). Most of these deficiencies have been corrected in subsequent amendments to the plan.

Metro's acknowledgment review of the Tualatin plan has identified a few remaining deficiencies which need correction before compliance acknowledgment by LCDC (see Exhibit "A"). The Regional Planning Committee has forwarded to the Council a recommendation for a continuance of Tualatin's request for acknowledgment of compliance to correct deficiencies identified under Goal #2 (Land Use Planning), Goal #7 (Lands Subject to Natural Hazards), Goal #11 (Public Facilities and Services) and Goal #14 (Urbanization).

LCDC's comment deadline on the Tualatin plan is May 16. Metro has notified DLCD of our anticipated late reply. They will consider our recommendation upon submittal.

- B. ALTERNATIVES CONSIDERED: Metro staff did not find any issues which warranted serious consideration of an alternative recommendation (i.e., for denial or a continuance).
- C. CONCLUSION: Metro's recommendation for a continuance will support local planning efforts while protecting regional interests.

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NOTE: For those desiring a copy of the "Tualatin Plan Acknowledgment Review" (Exhibit "A") and/or the "Preliminary Plan Review for the city of Tualatin (Exhibit "D"), please contact Leigh Zimmerman at the Metro office (221-1646).

TUALATIN PLAN ACKNOWLEDGMENT REVIEWIntroduction

The city of Tualatin, located in both Washington and Clackamas Counties, is bisected by I-5 and borders the southern edge of Metro's Urban Growth Boundary (UGB). The City has changed significantly since its incorporation in 1913. The once rural area is now a residential and economic growth center. From 1971 to 1977 the City experienced a tripling of its population. Early recognition of the ensuing growth fostered the development of the City's first comprehensive plan, adopted in 1972. The City also adopted an "Urban Renewal Plan" in 1975, and developed a more detailed renewal plan in 1977.

Since the adoption of the Statewide Planning Goals and Guidelines, the city of Tualatin has initiated a new comprehensive planning effort. The comprehensive plan package submitted for acknowledgment includes the "Phase I Technical Memoranda" (data base and inventories), "Community Development Code" (plan policies and implementing measures), and other supporting documents.

As stated in the preface, the Tualatin plan sets out policy and land use designations for land within the city limits and is, therefore, a "complementary plan."

Tualatin's plan was developed with the assistance of the consulting firm Goebel, McClure and Ragland.

Summary and Recommendations

Metro's acknowledgment review report is in two parts: 1) a draft review of the City's plan and implementing ordinances prepared in September, 1979, and 2) a final plan review focusing on issues of regional significance.

Metro's Draft Review of Tualatin's plan identified several plan deficiencies under the State Goals. A copy of this draft review is incorporated herein. It is recommended that the DLCD focus its review on the adequacy of Tualatin's final submittal regarding the subjects of draft plan deficiencies not covered in Part Two of our report.

Issues of regional significance were identified by 1) utilizing the Metro Plan Review Manual where regional issues (criteria) are italicized on the Plan Review Checklist Worksheets; and 2) an abbreviated version of Metro's December, 1979, document titled, "A Process for Defining the Regional Role in the Portland Metropolitan Area."

Metro recommends Tualatin's request for acknowledgment be continued to correct deficiencies of regional concern identified under Goal #2 (Land Use Planning), Goal #7 (Lands Subject to Natural Services), Goal # 11 (Public Facilities and Services) and Goal #14

(Urbanization). Other deficiencies identified by the DLCD should be added to the continuance requirements.

The city of Tualatin is to be congratulated for their early commitment to planning and the quality of their comprehensive plan submitted for acknowledgment.

General Requirements

All general required documents have been included in the Comprehensive Plan package submitted for review.

The Tualatin Plan "opening language," as follows, is adequate for Goal compliance:

"Notwithstanding the foregoing plan revisions, the Council shall conduct a public hearing at any time it is necessary to consider an amendment of amendments to the Plan text or Plan map when it is required to comply with the rules, regulations, goals, guidelines or other legal actions of any governmental agency having jurisdiction over matters contained in said Plan map or Plan text." (Community Development Code, Additions and Corrections, p. 2)

Although the language only indirectly references Metro (i.e., "...any government agency having jurisdiction over matters...."), it does specifically state: "The Council shall hold public hearings at any time it is necessary to amend this plan to comply with regional policy." (Emphasis added).

The plan indicates that the Urban Planning Area (UPA) will accommodate a population of 22,000 to 29,000 by the year 2000. Table 9 (Community Development Code, Additions and Deletion, p. 12) of the plan shows that the City can accommodate a population of approximately 12,000. This is more than adequate to meet the population needs as established within Metro's "208" population projections.

Goal #1 Citizen Involvement

The Tualatin Planning Advisory Committee (TPAC) recently has assumed the responsibilities of the Committee for Citizen Involvement (CCI). In September, 1979, the TPAC conducted a review of its Citizen Involvement Program and made appropriate amendments to the program. The evaluation of the CIP has not been submitted as a report, but rather contained within the TPAC minutes of September 19, 1979. The Committee concluded that the Citizen Involvement Program was adequate.

Metro did receive a city of Tualatin Goal #1 violation complaint in a letter dated June 12, 1979, from Mr. Lee R. Gensman. Mr. Gensman's complaint centered on item #2 of Goal #1 which requires

two-way communication with citizens and item #5 which requires assurance that citizens will receive a response from policy-makers. However, after further discussions and communications with the City's Community Development Director and Mayor and Mr. Gensman, Metro concludes that the City has adequately responded to all the concerns raised regarding Goal #1 violations.

Conclusion: The City complies with all regional requirements under Goal #1.

Goal #2 Land Use Planning

Tualatin has addressed the various inventory and analysis requirements in the "Technical Memoranda" (TM), "Urban Renewal Plan" (URP) and other supporting documents. The "Community Development Code" (CDC) contains a summary of basic findings, assumptions policies and implementing measures.

"Urban Planning Area Agreements" (UPAA) have been signed with both Clackamas and Washington Counties. Within the unincorporated portions of Clackamas County, the County's plan shall control land use actions, although both the City and County's plans have consistent land use designations. A process for review of proposed developments within the dual interest area has been included in the agreement and also includes a provision for the participation of any special districts.

Consistent plan land use designations for unincorporated lands between the City and Washington County will be established prior to the County's request for plan acknowledgment. The City has agreed to establish plan designations for lands presently undesignated within the Urban Planning Area (UPA). A review process for land use actions in the dual interest area has been established.

Deficiencies regarding the Washington County/city of Tualatin UPAA boundary map have been identified and are discussed in detail under Goal #14 of this review.

All Goal #2 plan deficiencies have been noted under the respective Goals of this review.

Conclusion: The City does not comply with the regional requirements under Goal #2. In order to comply, the City must correct deficiencies identified under each Goal within this review.

Goal #3 Agricultural Lands

Conclusion: Not Applicable.

Goal #4 Forest Lands

Metro's "Draft Review" of the City's plan indicated the City complies with all Goal #4 requirements.

Conclusion: The City complies with all regional requirements under Goal #4.

Goal #5 Open Space, Scenic and Historic Areas and Natural Resources

As requested at the draft review stage, the City has amended their plan to include bikeway designations consistent with the "Urban Outdoor" study developed by CRAG in 1972.

There are no solid waste disposal site alternatives located within the city limits and, therefore, consistency with Metro's "Disposal Siting Alternatives" study, 1978, does not apply.

1000 Friends of Oregon has objected to the Tualatin plan due to an inconsistency between the City's wetlands boundary and that established by the U.S. Army Corps of Engineers. Presently, the City has included about 90 acres in their Hedges Creek wetlands area and the Corps has identified about 250 to 300 acres in this area. In a cooperative effort, the Friends of Wetlands, industrial owners of the area (most of the wetlands are zoned for industrial use), the State Department of Fish and Wildlife and the City mutually agreed to a wetlands district boundary. The adopted boundary represents a successful effort to balance competing goals. The Corps of Engineers has final authority in setting the wetlands boundary, but will not make the final boundary determination until after public hearings. Metro finds that the City has established a justifiable interim wetlands boundary and provided adequate protection through the "Wetlands Protection District" ordinance provision. Since the Corps has not completed their deliberation on this matter, their request for any further boundary adjustments should be dealt with as an update item.

Conclusion: The City complies with all regional requirements under Goal #5.

Goal #6 Air, Water and Land Resources Quality

The plan presents a good analysis of both existing and projected air quality conditions in the Tualatin area. While the "Phase I Technical Memoranda" (TM) contains a somewhat dated analysis, the "Community Development Code" (CDC) updates this information by referencing the State Implementation Plan (SIP) and recognizing that the Portland/Vancouver Interstate Air Quality Maintenance Area (AQMA) is a nonattainment area for ozone. The CDC recognizes Metro's and DEQ's air quality roles in developing a regional control strategy to bring the area into attainment by 1987.

The plan states: "The City will cooperate and work with these agencies (Metro and DEQ) to realize this goal." (Attainment by 1987.)

Further, plan objective (policy) commits the City to cooperating with Metro and DEQ in efforts to meet applicable air quality standards. As stated in the CDC, the City will:

"Cooperate with the Department of Environmental Quality and the Metropolitan Service District to meet applicable air quality standards by 1987" (CDC Additions and Deletions, p. 4)

As noted in the plan, water quality is largely a responsibility of the Unified Sewerage Agency (USA) serving the area. The "Areawide Waste Treatment Management Study, Technical Supplement 6" addresses water quality in the Tualatin River, and concludes that it is not polluted. The City has developed the following policy to ensure protection against any future degradation to the river:

"Develop regulations to control sedimentation of creeks and streams caused by erosion during development of property."
(CDC, Additions and Deletions, p. 3)

Metro's Public Facilities and Services staff has indicated there are no groundwater pollution problems within the Tualatin area.

The plan does recognize Metro's "Areawide Waste Treatment Plan" (CDC, Part 2, Div 4, Ch. 300, p. 1) and assumes USA's treatment system to be consistent with the regional plan. Also, the City's plan contains the required coordination language.

"Coordinate development plans with Regional, State and Federal Agencies to assure consistency with statutes, rules and standards concerning air, noise, water quality and solid waste." (CDC, Part 2, Div. 2 ch 400, p. 7)

Conclusion: The City complies with all regional requirements under Goal #6.

Goal #7 Areas Subject to Natural Hazards

The plan includes a good description and analysis of potential hazards. The core area of the City is highly vulnerable to flooding by the Tualatin River. The "Tualatin Drainage Plan" and the "Urban Renewal Plan" represent concerted efforts towards addressing the problems of flooding. Alternatives for financing planned flood protection improvements (e.g., federal grants, tax increment, etc.), are discussed in the "Urban Renewal Plan."

The "Urban Renewal Plan" (p. 23) contains policy for protecting only the area within the renewal district from 100-year floods. This policy is implemented through the "Floodplain District" Standards, and the "Wetlands Protection District" (CDC Standards, Sections 2700 and 2800, respectively).

The plan does not contain policies that address hazards resulting from soil erosion and deposition, steep slopes and weak foundation

soils. The City has adopted Chapter 70 of the Uniform Building Code which established standards for excavation and fill in potential hazard areas.

Conclusion: The City does not comply with the regional requirements under Goal #7. In order to comply the City must:

1. Adopt policy to protect all lands subject to flood hazard.
2. Adopt policies that address potential hazards resulting from soil erosion and deposition, steep slopes and weak foundation soils and/or include a disclaimer statement for those hazard which are not in the City and for which, therefore, policies are not applicable.

Goal #8 Recreational Needs

The plan contains a good analysis of the recreational needs for the City. Policies relating to regional plans include:

"Coordinate this Park and Recreation Plan with the Plans of Regional, State and Federal Agencies to achieve consistency among the various plans."

"Coordinate the development of the pedestrian/bicycle system with plans developed by the Metropolitan Service District for these types of facilities." (CDC Additions and Deletions, p. 6)

The plan's "Greenway" and "Bikeway" systems (CDC, Additions and Deletions, "Attachment B") are consistent with "The Urban Outdoors" study, CRAG, 1971.

The City intends to develop a "Capital Improvements Program" to assist in the implementation of their Park and Recreational programs. The "Wetlands Protection" and "Floodplain" provisions of the CDC, together with improvements to existing roadways, are adequate to implement the proposed "Greenway" and "Bikeway" systems.

Conclusion: The City complies with all regional requirements under Goal #8.

Goal #9 Economy of the State

The "Technical Memoranda" (TM) document Chapter III, (pp. 26-34) contains a good analysis of the City's economic base and potential for future development. It projects land need requirements for both commercial and industrial development for the year 1995.

The economic analysis concludes that an additional 210-250 acres of industrially zoned land and an additional 17-30 acres of commercial-ly zoned land will be required to meet the year 2000 needs. Plan policy, however, calls for over 526 acres zoned for industrial development and 110 acres zoned for commercial development. This "over allocation" is justified by (1) constraints due to ownership patterns and flood hazards, and (2) the City's unique competitive location (i.e., located adjacent to I-5 and 205 Freeways and State Highway 217 Expressway). Further, it is important to note that any definition of economic need by any single jurisdiction within the region is at best an estimate. As an example, land needs for lumber and wood products and apparel manufacturers could be based on standards which vary from 2 to 25 employers per acre, respectively. In the commercial sector, this variation is even more dramatic. For retail trade, land needs could be based on a standard of approximately 20 employees per acre; whereas finance, insurance and real estate businesses could be based on about 141 employees per acre. (Source: UGB Findings, 1979, p. 8) Thus, although the projected land "needs" do not coincide with planned "allocation" for economic development, this variation is adequately justified by land constraints and the City's unique location, variation in land demand by type of industry and the absence of a regionwide economic analysis and allocation study.

Plan policies which generally "encourage" economic development are implemented through the "Community Development Standards," and the "Urban Renewal Plan."

Finally, Section 2605 of the "Community Development Standards," entitled "Environmental Standards," addresses the DEQ "Air Containment Discharge Permit" process for industrial developments.

"Air Quality

1. All new uses allowed within any industrial Planning District shall be designed to comply with the most recent air quality standards adopted by the Oregon State Department of Environmental Quality. Compliance with said standards shall be certified pursuant Section 2603. Additionally, where applicable by state rules, industries required to obtain a Department of Environmental Quality Air Contaminant Discharge Permit shall so obtain said permit and submit said permit to the City as a part of the certification statement required pursuant Section 2603."

Conclusion: The City complies with all regional requirements under Goal #9.

Goal #10 Housing

The Tualatin plan contains a good inventory of residential development trends to date. The plan does not analyze housing "needs" as per the Goal #10 criteria established within the "Plan Review Manual." While the TM outlines the financial capabilities of the City's households and identifies the rents and prices paid for housing through survey results, (TM, Chapter II, A, pp. 7-8), the sample was not statistically valid. The City's housing needs, however, are defined on a regional basis, as per the Metro "UGB Findings," (i.e., guidelines for single family/multi-family split and housing densities), and the year 2000 population projections (i.e., Metro "208" population projections). Therefore, Tualatin's housing needs have been adequately defined to address regional concerns.

The "Buildable Lands Inventory" (TM, Chapter III, C, Exhibit 7) indicates there are 519 acres of non-constrained lands planned for residential purposes. Although constrained lands are labeled "Non Buildable," development can take place provided specific standards are met.

The CDC (see "Additions and Deletions," p. 12) nets out lands for streets (20 percent) and a market factor (25 percent) noted as "unavailable."

Tualatin's plan allows for new residential development at densities which exceed those anticipated at a regional level (i.e., as specified in the "UGB Findings"). New single family construction is planned for over six units per net acre (UNA). New multi-family development is planned for an average density of 22 UNA. Thus, overall, the City is planning for about 10 UNA for all new construction. For new development, the "UGB Findings" establish a minimum single family housing density of 4.04 UNA and a multi-family density of 13.26 UNA, resulting in an overall density of 6 UNA.

As indicated below, the city of Tualatin anticipates an ultimate single family/multi-family (SF/MF) housing units build-out ratio of 44/56. This is well above the regional expectation of a 65/35 SF/MF ratio as established in the "UGB Findings," Metro, 1979.

Existing Residential Use, 1977

SF	561.02 (net acres)	1,014 (units)	54.9(%)
MF	45.85	834	45.1
Total	606.87	1,848	100

Planned New Construction

SF	222 (net acres)	*1,344 (units)	38.8(%)
MF	95	*2,122	61.2
Total	317	3,466	100

*includes approved developments but not under construction

Build-Out Residential Development

SF	783 (net acres)	2,358 (units)	44.4(%)
<u>MF</u>	<u>141</u>	<u>2,956</u>	<u>55.6</u>
	924	5,314	100

(Source: CDC, Additions and Deletions, Tables 6, 7, 8 and 9, p. 12)

1000 Friends of Oregon has called into question the buildability of lands zoned RH-HR (High Density-High Rise) in the wetlands areas. However, upon closer examination of topographic maps of the area in relation to potential flooding (i.e., 100 year flood plain level) and noting the total lands within the "Wetland Protected Area" and setback area (40 feet); it can be demonstrated that Tualatin can still meet its multi-family housing needs. Lands designated RH-HR and located within the protected area and setback area total approximately 16 acres. These lands would thus be identified as non-buildable, resulting in a multi-family housing loss of about 480 units. The adjusted new construction single family/multi-family housing ratio would be 45/55 which is still well above regional expectations. The City does allow density transfers in areas of restricted use (e.g., wetlands), but on an informal basis.

Using Metro's assumptions for vacancy rates and household size, Tualatin could house an ultimate population of about 12,600.

Even by eliminating the 25 percent market factor as established by the City, one could show a plan holding capacity population of just under 14,000 and a 44/56 SF/MF build-out ratio. Thus, whether or not the market factor is utilized, the city of Tualatin does meet Metro's expectations regarding an appropriate single family/multi-family ratio and population holding capacity.

The Tualatin plan discusses the demand trends for single and multi-family housing units. A set of assumptions are presented which summarize the alternatives for meeting the City's housing needs:

"There will be a continued strong demand for housing in the City because of the City's ability to create new job opportunities and the increasing expense of driving long distances to work.

"The proportion of single family to multi-family housing units should approximate the proportion predicted for the region in the Year 2000.

"The introduction of more commercial and industrial uses will create more job opportunities and thus create a more diversified population requiring a related diversity in housing type.

"There will be an increasing demand for reasonable-priced owner-occupied housing units. This may include small houses on small lots, condominium developments, mobile residential unit housing subdivisions and other similar housing types."

(CDC, Part 2, Div. 2 Chapter 500, pp. 2-3)

Plan policies call for the provision of a variety of housing types at specified locations and at appropriate densities. Mobile homes are allowed in mobile home parks and subdivisions. Policy calls for the establishment of a quota (maximum 50 units per year) for mobile home subdivisions.

Housing policies of the plan are implemented through the "CDC Standards" and the "Subdivision Ordinance No. 176-70." Single family developments are allowed outright in the Low Density District (RL) and multi-family developments are allowed outright in the four Medium to High Density Districts (i.e., RMS, RMH, RH and RH-HR). Mobile homes are permitted as a conditional use in the RL District and outright in the Medium Low Density District (RML). Mobile homes are also permitted as a conditional use in the High Density Residential-High Rise District (RH-HR), but this provision is inconsistent with plan policy (re: CDC, Part 2, Dev. 2, Chapter 500, p. 6). This latter item is simply an administrative error and can be corrected as part of a continuance order or update, but is not of the magnitude to warrant denial of compliance with Goal #10.

Mobile Home Parks are permitted outright in the RML District in specific locations as designated on the Tualatin "Plan Map."

All development, except single family dwellings, are subject to approval by the Architectural Review Board (ARB). The "Criteria and Standards," which must be met before affirmative action is taken by the ARB, are clear and reasonable. They include:

- "1. The Board shall, in exercising or performing its powers, duties, or functions, determine whether there is compliance with the following:
 - a. The proposed design of the development is compatible with the design of other developments in the same general vicinity and;
 - b. The location, design, size, color and materials of the exterior of all structures and signs are compatible with the proposed development and appropriate to the design character of other structures in the same vicinity.

- c. The proposed site development, including the site plan, architecture, landscaping and graphic design, is in conformance with the standards of this and other applicable City ordinances insofar as the location, height, and appearance of the proposed development are involved;
2. The Board shall, in making its determination of compliance with the above requirements, be guided by the objectives and standards set forth in Section 3002.1(A) (Architectural Review Process) and Section 3003 (Design Standards).
3. The Board shall in making its determination of compliance with the requirements herein set forth, consider the effect of their determination on the cost of housing and shall seek to balance that effect with the other requirements herein set forth."

(CDC, Additions and Deletions, pp. 10-11)

The conditional use approval standards, which specifically impact the provision of mobile homes in the low density residential district, are also clear and objective. Tualatin's approval standards are nearly identical to those of the city of Milwaukie's. While the introductory language speaks to the "best interests of the surrounding property or neighborhood or the City as a whole" (Section 1004), the language continues to list specific conditions that may be imposed.

Conclusion: The City complies with the regional requirements under Goal #10.

(Note: Metro recommends that Tualatin correct the inconsistency between the RH-HR policy and zone district during the continuance order or first plan update.)

Goal #11 Public Facilities and Services

The Tualatin plan presents a very good analysis of the City's water and sewer systems. Existing and projected system capacity and needs are identified. The water and sewer system master plans both contain a list of needed improvements, cost estimates and a discussion of alternative financing methods. However, the plan has no policies on the provision of water and storm drainage services.

Tualatin is served by the Unified Sewerage Agency (USA). The plan does reference Metro's "Areawide Waste Treatment Plan" (CDC, Part 2, Div. 4, Chapter 300, p. 1) and contains the following policy on coordination:

- "1. Coordinate development plans with Regional, State and Federal Agencies to assure consistency with statutes, rules and standards concerning air, noise, water quality and solid waste."

(CDC, Part 2, Div. 2, Chapter 400, p. 7)

Tualatin's water is supplied by Lake Oswego on a contractual basis. As stated by the City, due to deficiencies in Lake Oswego's distribution system, water supply to Tualatin during peak demand periods has been inadequate.

Tualatin receives water on an "excess supply only" contractual basis. The City concludes that even if the circulation deficiencies were corrected, Lake Oswego's water source (i.e., the Clackamas River), is not adequate to meet the needs of both jurisdictions on a long-range basis.

As a short-term solution, Tualatin could connect to the Tigard Water District or Lake Grove Water District. In a telephone conversation, (4-17-80), Wink Brooks, Community Development Director for Tualatin, said it was questionable whether Tigard's present tie with Bull Run was adequate to meet the long-run water supply needs of Tigard and Tualatin. He indicated that a connection to the Bull Run source at Raleigh Hills (not yet completed) would be the logical long-range water supply source for both Tualatin and Tigard. The cost of this connection could total 5-10 million dollars, however. Tualatin intends to submit a bonding program to the voters in the coming year to finance this alternative.

The "Portland/Vancouver Metropolitan Area Water Resources Study, Water Supply, Regional Water Supply Plan," (U.S. Army Corps of Engineers, 1979), has recently been released for comment. Regarding the Tualatin water supply problems, the study recommendations are as follows:

- "1) Tigard and Tualatin should seek other water sources and discontinue obtaining water from the Clackamas River.
- 2) Tigard and Tualatin should join the Bull Run system if satisfactory contractual arrangements can be achieved." (p. 72)

Metro believes that the required "opening language" provides adequate means by which Tualatin's plan can be amended as necessary to implement future Metro policy on this matter.

"Arrange the various land uses in a manner that is energy efficient." (CDC, Part 2, Div. 2, Chapter 400, p. 7)

Goal #13 is directly addressed by the above policy and supported by several policies within the housing and transportation elements, (e.g., multi-family housing encouraged along mass transit lines). Energy conservation policy is implemented mainly through the Land Use Plan, (i.e., arrangement of land uses).

Conclusion: The City complies with all regional requirements under Goal #13.

Goal #14 Urbanization

Tualatin's city limits are, in part, coterminous with the adopted regional UGB and, therefore, the plan must recognize and be consistent with the regional UGB (i.e., located on the Plan Map) and acknowledge the need to work through the Metro UGB amendment process on matters affecting the Boundary.

The Tualatin "Plan Map" does not identify the UGB as depicted on the plan's Exhibit "G". The City's Urban Planning Area (UPA) includes lands presently outside the UGB (located along the southwestern edges of the UPA). Also the UPA excludes a portion of land that is within the regional UGB, (located also along the southwestern edge), to which the City is the logical provider of services (see Exhibit "B," attached).

The Urban planning Area Agreement (UPAA) with Washington County also shows a similar UGB location error on the attached map of the agreement (see Exhibit "C," attached).

The City does not recognize Metro's role in the UGB amendment process.

Since Tualatin has submitted a "complementary" plan, and all lands within the City are considered ready for urban development and will be provided with a full range of urban services, policies for the conversion of urbanizable lands to urban are not applicable.

The Tualatin Plan, in coordination with Washington County, has developed land use designations for lands outside the city limits (i.e., land within the City's Urban Planning Area). 1000 Friends of Oregon argues that these land use designations outside the city limits violate Goal #10 by failing to encourage sufficient multi-family development. However, as stated above, Tualatin is submitting a "complementary" plan and is, therefore, seeking acknowledgment for lands only within the city limits. The burden for meeting Goal #10 for lands outside the City lies with Washington County not the City. Thus, Metro finds 1000 Friends' objection inappropriate.

Conclusion: The City does not comply with the regional requirements under Goal #14. In order to comply, the City must:

1. Reference the regional UGB on Tualatin's Plan Map.
2. Amend Tualatin's UPA to be consistent with regional UGB.
3. Amend the Tualatin/Washington County UPAA map to be consistent with the regional UGB.
4. Acknowledge Metro's role in the UGB amendment process.

MB:bk
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Although the long-range Tualatin water supply problem is being addressed on a regional level and a detailed "Water System Master Plan" map is adopted which addresses identified problems, Tualatin must still adopt specific policies on the provision of water facilities and services.

The "Tualatin Drainage Plan" was completed in 1972 and updated in 1975. This document provides an excellent identification of problems and proposed improvement measures with an analysis of alternative courses of action. The drainage plan contains a set of policies (pp. 26-27) which speak to the responsibilities of property owners, the City and other governmental agencies. However, this plan and enclosed polices were not adopted. The policies are implemented, in part, through the Subdivision Ordinance (pp. 17-19). The majority of the plan will be implemented as funds are secured for the various proposed improvements to the drainage system.

Conclusion: The City does not comply with the regional requirement under Goal #11. In order to comply the City must: adopt policies on the provision of water and storm drainage facilities and services.

Goal #12 Transportation

Tualatin has submitted a good transportation inventory and analysis, that is both Citywide and specific to the downtown "Urban Renewal" area. Policy regarding coordination with Metro on the Regional Transportation Plan (RTP) is included. A number of functional classifications of roadway inconsistencies exist between the City's plan and Metro's RTP. Resolution of these inconsistencies will take place over the coming months, as part of the regional transportation planning process.

Of critical regional concern is Tualatin's capacity problems along the Nyberg Street/Tualatin-Sherwood Road cooridor. Lands designated for industrial development within Tualatin and immediately east of the City (in the unincorporated areas of Washington County) are projected to generate demands which far exceed roadway capacity. As part of the Metro RTP program, a "Southwest Circulation Plan" is scheduled for development in fiscal year 1981-82 that will address this roadway capacity problem

Conclusion: The City complies with all regional requirements under Goal #12.

Goal #13 Energy Conservation

Although energy consumption and distribution within the City is not identified as per the "CRAG Regional Energy Analysis," the plan contains a good identification of regional issues and findings of fact on energy conservation. (TM, Chapter III, D1, pp. 6-8). The following policy on energy conservation is included in the plan:

TUALATIN PLAN MAP

EXHIBIT "B"

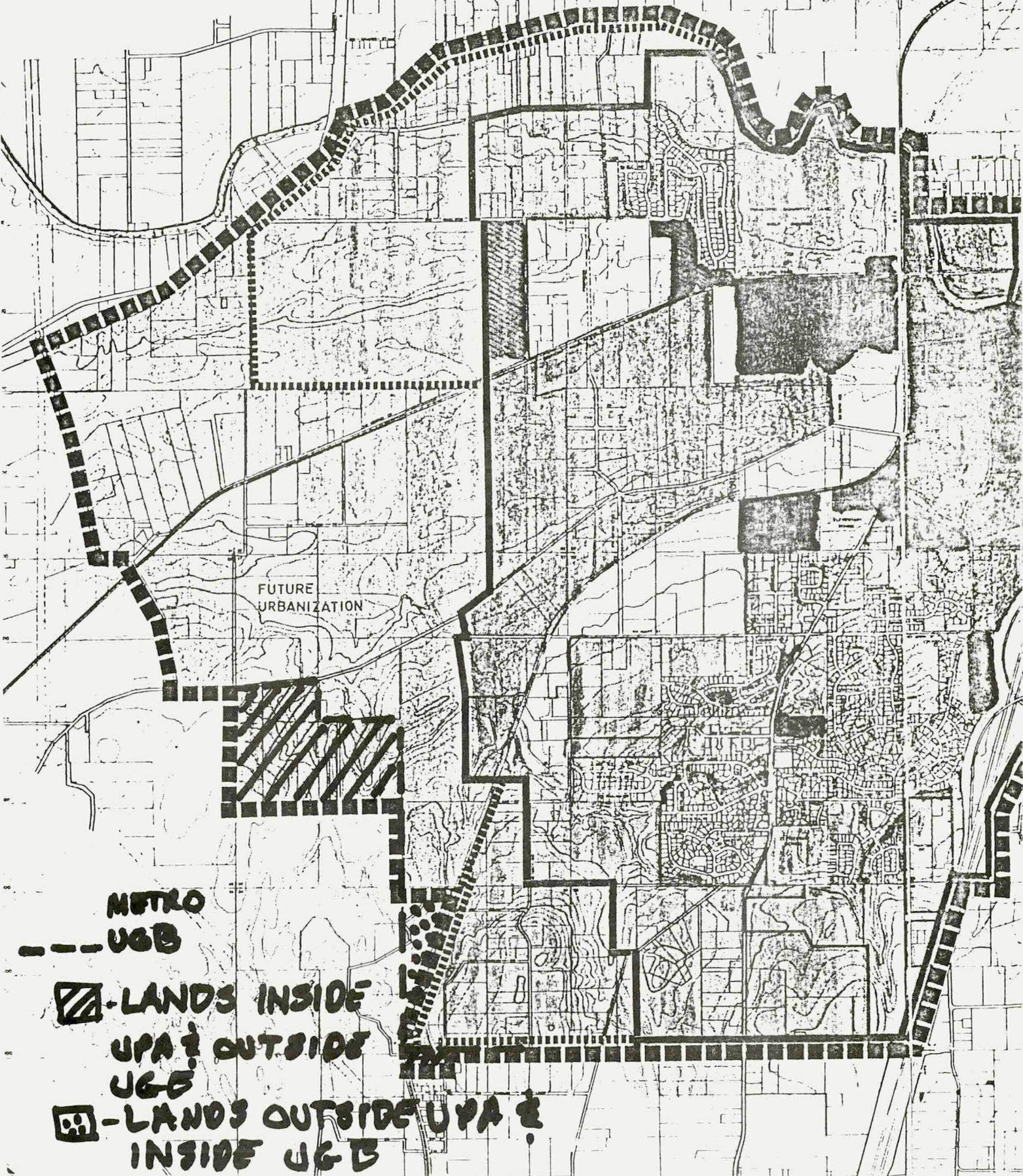
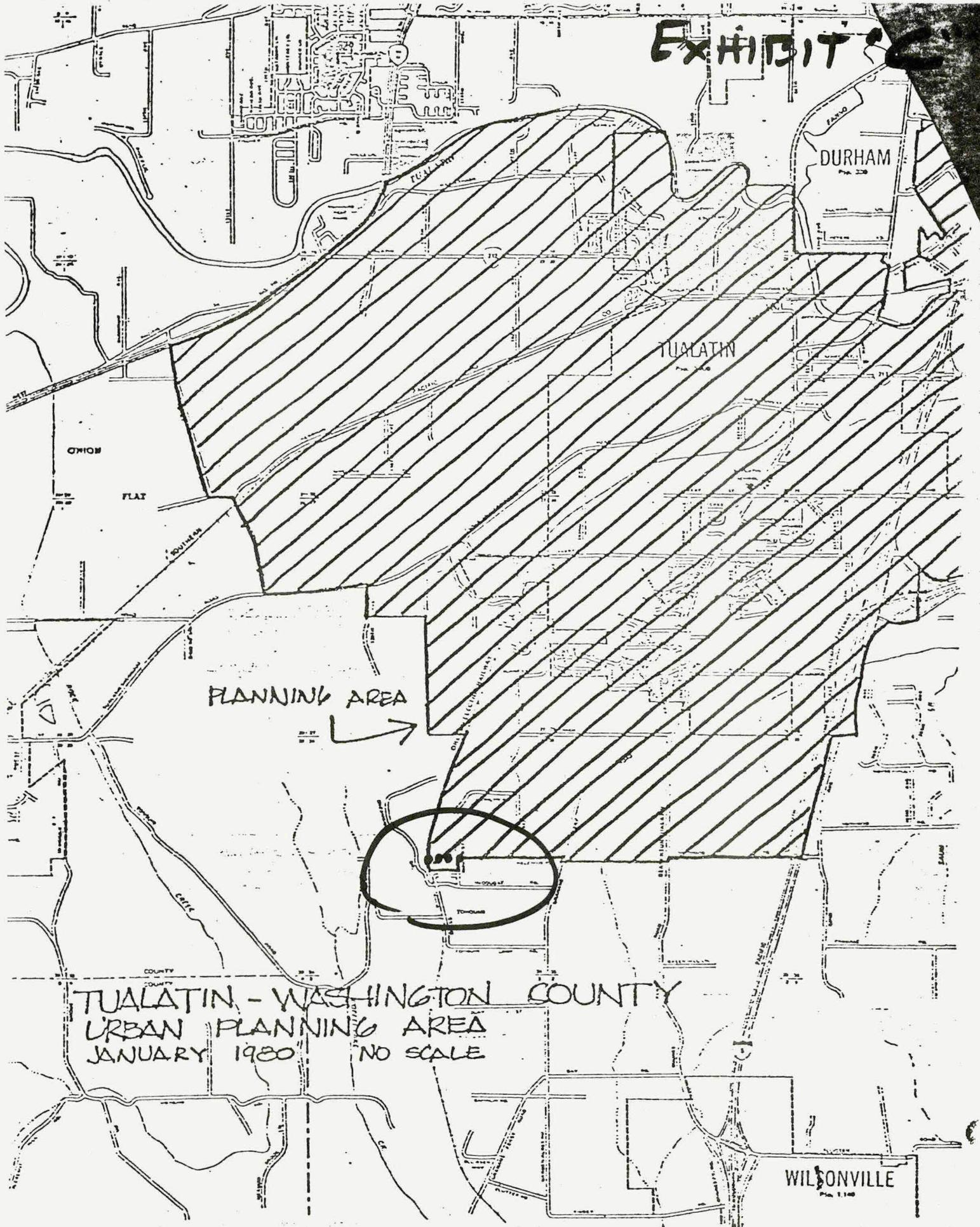


EXHIBIT C



PLANNING AREA



TUALATIN - WASHINGTON COUNTY
URBAN PLANNING AREA
JANUARY 1980 NO SCALE

WILSONVILLE
Plan 1100

Metropolitan Service District

527 SW Hall Portland, Oregon 97201 503/221-1646

Memorandum

Date: September 21, 1979
To: Wink Brooks, Director Community Development
From: Michael V. Butts, Metro Plan Reviewer
Subject: Preliminary Plan Review for the City of Tualatin

Following is a summary of recommended amendments for the Tualatin Comprehensive Plan as discussed at our September 7, 1979 meeting. This summary is based on a goal-by-goal format with numbers referring to the "Metro Plan Review Manual" checklist worksheet.

All changes or additions to policy must be handled as plan amendments. These items are noted with a "P." Clarification of or additions to background data can be handled through technical memoranda which should be submitted with the plan for acknowledgment and kept with the plan on file (ideally, included in a reprinting of the Technical Memoranda document). These items are indicated with a "T." Items essential for compliance are indicated with a *. While none of the remaining items suggested for inclusion is itself essential for compliance, the cumulative weight of the deficiencies, if none were addressed, might affect goal compliance in certain areas. We urge you, therefore, to review these suggestions carefully and incorporate as many as are practicable.

0. General Requirements

* The following items have been identified as missing from your Comprehensive Plan package and will have to be submitted for compliance acknowledgment by LCDC:

0.1.3. Subdivisions ordinance

0.1.5 and 0.1.5.1 The list of supporting documents is a list of those background reports, special studies, etc., which have not been included with plan documents submitted for acknowledgment (see the compliance acknowledgment rule in Section III of the Plan Review Manual and Goal #2 language). This is not an onerous requirement but an essential one. (T)

0.1.7 Identification of the current chairperson on the existing TPAC list.

0.1.8 A revision of the "opening language" (CDC page 1) as recommended in the self-evaluation preface.

* 0.2.1. Population projections in the plan are as much as five times higher than an estimate of "208" projections for growth. The numbers in the plan, however, appear to be for the entire planning area. Since you will be requesting acknowledgment for your plan for land within current city limits, you must have corresponding population projections. Metro's demographic staff estimate that a maximum of about 14,000 would be consistent with "208."

You have two alternatives to remedy this problem when you prepare your new population estimates for land within city limits:

1. Start from the year 2000 projections in "208" for census tracts 204, 308, 320, and 321 (or for the smaller traffic zones) and relate these to city projections by spelling out the assumptions and analysis, which justify the city receiving whatever proportion of that growth you project (the city was 4.3% of the population for those census tracts in 1970, 14.8% in 1975, 17.9% in 1977 and you have projected for the entire planning that it will be 50% in the year 2000. These figures all assume an expanding boundary.) You can use whatever numbers you want for current city limits provided you can make a detailed, convincing case as to why this projection is consistent with the "208" projection for the area generally -- i.e., why you expect more and more of the area's growth to occur within current city limits (to the extent you do). (T)
2. Use whatever methodology you want but clearly state that:
 - a. You recognize these numbers are not consistent with "208" and should be;
 - b. You are committed to participating in the Metro process for developing regional consensus for a set of population projections but that this process has not yet been completed;
 - c. The current numbers are interim numbers only and will not be used to justify any project funding requests;
 - d. That because you are not directly responsible for any major facilities planning and because your land use plan has some "give" since it would require build-out to reach current projections and the UGB Findings assume less than full development, you do not anticipate any problems with possible future downward revisions in your numbers; but

- e. You will open your plan for any amendments as may be needed to be completed to be consistent with the regional projections when adopted. (P)

Goal #1: Citizen Involvement

We will not evaluate compliance with this goal until we have receive the CCI evaluation and any additional materials you may want to submit. The evaluation should address compliance with each of the six goal requirements, as provided for in your adopted Citizen Involvement Program.

Goal #2 Land Use Planning

The plan has an established format of the base data/inventory in the Technical Memoranda and a general background, findings, assumptions and objectives for each major heading in the Community Development Code. This is a usable format but has not been followed consistently. For example, inventory information has been included in the policy section in some cases, while findings and assumptions have been altogether left out in material on public and semi-public uses, and water, sewer, drainage, and flood hazard. In addition, a specific heading titled "Natural Resources" in the "Code" would assist in understanding the city's policies regarding LCDC Goals #5, #6, and #7 and tend to balance the growth/conservation-preservation focus of the plan as was done in the Technical Memoranda. These inconsistencies are confusing and should ideally be remedied when you republish your plan. Instances where lack of clear findings, assumptions or policy jeopardize compliance are noted at the appropriate goal.

* Finally, to demonstrate that you have addressed all inventory requirements of the various goals, you should include a "disclaimer," listing all the resources and hazards which are not present in the city and for which, therefore, inventory requirements do not apply. (T)

Following is our list of inventory requirements which appear not to apply to the city:

- 5.1.2.: Mineral Resources
- 5.1.3.: Energy Sources
- 5.1.8.: Wilderness
- 5.1.10.: Cultural Areas
- 5.1.12.: Scenic Waterways
- 8.1.1.3.: Archeology
- 8.1.1.8.: Hunting
- 8.1.1.10: Winter Sports
- 12.1.1.4 and 12.1.1.5 Air & Water Transportation

* 2.1.2.1. The plan map must show the area for which you are requesting acknowledgment -- i.e., current city limits. (P)

* The balance of items which must be completed for goal #2 include: (2.2.1) list and location of plan documents on file and (2.2.2.1) Urban Planning Area Agreements.

Goal #3 Agricultural Lands

Not applicable.

Goal #4 Forest Lands

The city has adequately identified Forest Lands in the Natural Resource Inventory Technical Memoranda and have developed policies and implementation strategies for their preservation as part of the Open Space/Parks and Recreation Sections of the Plan. Commercial Forest need not be addressed in the plan.

Goal #5 Open Space, Scenic and Historic Areas and Natural Resources

5.1.1.3. The "Urban Outdoors" has identified "Areas of Unique Opportunity," "Scenic Drive or Parkway" and "Bikeway or Trail" in the northern sections of Tualatin. These should be referenced in the plan text and/or map and coincide with local plan designations. (P)

5.2.3., 5.2.4. and 5.3.1. Policies included as "Land Use Requirements" in the Urban Renewal Plan are adequate for the areas covered by this plan, but there are no policies to protect resources outside this area nor does there appear to be adequate implementing measures to protect these resources.

The wetland protection zone is adequate to protect most resources covered by the goal, although the Greenway and Riverbank Protection Ordinance would cover a larger area and so are desirable for full protection.

In addition, none of these zones protects historic sites and features. There should be appropriate implementations for plan policy on the protection of this resource. (P)

Goal #6 Air, Water and Land Resources Quality

6.1.1. Air quality is well documented but should be updated with more recent data which is available at DEQ or Metro office.

6.1.2. Water quality of the Tualatin River has not been analyzed and consequently no policies or implementation strategies have been developed to resolve identified problems. Water quality must be addressed to satisfy the evaluation criteria identified above before compliance with Goal #6 can be ascertained. (We refer you to the "208" Water Quality Study, Technical Supplement #6).

6.1.3. Although "Solid Waste" is a Metro problem, the city has the responsibility to identify, in the plan, some basic findings and describe Metro's role. A brief summary to this effect can be culled from "Disposal Siting Alternatives," Metro Chapter 7, located at the Metro office. (T)

6.1.4. Noise was listed in the Table of Contents but this section was missing from the plan. Policies have been adequately developed to deal with noise problems in industrial zones. Traffic noise is likely a problem in the Tualatin area as it is in most cities. Consideration should be given to developing noise policies in other land use zones.

Goal #7 Areas Subject to Natural Hazard

* 7.1. The "location" criteria cannot be met without the inventory map. These maps should either be included in the plan document or referenced as to the map title and where these maps (i.e., City Hall) are located. (T)

Goal #8 Recreation

The recreation section has forwarded several park sites and park development proposals. In order to carry out these plans, financial resource options will need to be researched. The financial and/or manpower option should be summarized in the plan to meet the requirements of 8.2.2.3., availability of resources. As we discussed, a policy for the development of a capital improvement program for parks would be an appropriate approach. (P)

Goal #9 Economy of the State

9.2.1. A brief summary of the various economic growth alternatives considered in the various group meetings and in-house discussions would be helpful. (T)

* 9.2.2. As discussed in our meeting, the economic analysis calls for 210-250 acres of additionally zoned industrial land and 17-30 acres commercial land to meet the year 2000 needs.

The plan, however, identifies over 526 acres zoned for industrial development and 110 zoned for commercial. The policies do not follow the analysis. The rationale behind this excess requires further discussion in order to justify the plan's policies. (T)

Goal #10 Housing

* 10.2. Before we can assess the appropriateness of your housing mix (10.3.1), we will need to have the single family, multi-family and mobile home mix aggregated for just the land within the city limits.

Your analysis of land available and necessary for individual use might be strengthened by a discussion of net increases, if any, in land used for medium and high density residential use and a comparison of your proposed mix with current or projected mixes for adjacent suburban communities.

A table and a brief discussion identifying the family and individual income levels of the city's residents; and a comparison with present price levels and rent ranges for housing is needed to assess housing needs. This analysis should also include an estimate of total units needed by type consistent with the analysis of units which will be made available.

* 10.3.2 Lastly, in order to assure that approval standards are clear, objective and reasonable, the language of Chapter 3000 Community Design Standards, Section C, Criteria and Standards 1.6. and 1.c should be revised as discussed at the September 7, 1979 meeting.

DLCD staff felt that the changes we discussed should generally be adequate to ensure consistency with the St. Helens policy provided that:

1. The plan or ordinance contained a statement that no design conditions would be attached which would unreasonably increase the cost of construction; and
2. That those elements of the design features to which changes might be proposed (e.g., roof pitch or overhang) were explicitly listed in the ordinance.

Goal #11 Public Facilities and Services

* 11.1.1. The Technical Memoranda and Code deal exclusively with the sewerage collection system. Discussion is required regarding the U.S.A. Treatment Facility capacity and problems it may have in serving the Tualatin area until the year 2000 (T).

* 11.1.4. The school district has likely developed plans for future expansion. A summary of findings and proposals should be included in the comprehensive plan (T), along with policy to cooperate with the school district in future planning efforts (P).

11.1.8. Policies have been developed for health care in terms of land use, but not in terms of service, need or problem identification. Reference to county and/or state agencies which address the needs for health care will be sufficient to meet this criterion (T).

11.1.10. The "Civic Center Study" addresses future need requirements in terms of space requirements for police, fire and general government. A brief summary of the present level and capacity of existing police, fire (although presently served by the County) and general government services should be added (T).

Goal #12 Transportation

The Transportation Division's review of the plan's transportation element is attached. The issues it raises which need to be addressed for goal compliance are those on the "Public Transit Goal" (12.2.1.3 and 12.2.4.3.) and on the "Special Transportation Issue" (12.2.1.1. a and 12.2.4.4.).

A brief summary of special transportation needs (number of elderly, etc.), and discussion of Metro's Special Transportation Plan (T), along with policy in support of cooperation with Tri-Met in future planning efforts (P), will be adequate to address the special transportation issue.

The Public Transit Goal should be revised to be consistent with current Tri-Met Service criteria (or supplemented by policies and programs adequate to meet this goal without assistance from Tri-Met).

Goal #13 Energy Conservation

*13.1. A summary of the data on energy use in Tualatin from the "CRAG Regional Energy Analysis" will meet the requirements of 13.1.1. through 13.1.4. (T)

13.2. Several good energy conservation methods were identified in the Technical Memoranda but not carried over to the code document in the form of policy statements. In view of adoption

Memorandum
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Page 8

of direct policy on energy conservation, a summary of how policy in such areas as transportation and housing have addressed recommendations in the Technical Memorandum on this subject would be adequate (T).

Goal #14 Urbanization

This review did not include an evaluation of urbanization policies for consistency with Metro policy adopted August 23, 1979.

cc: Linda Macpherson, LCDC
Jim Knight, LCDC
Art Schlack, Washington County
Sue Klobertanz, Metro

MB:ss
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0061A

Metropolitan Service District

527 SW Hall Portland, Oregon 97201 503/221-1646

Memorandum

Date: September 17, 1979
To: Mike Butts, Plan Review
From: Gary Spanovich, Transportation Plan Development
Subject: Metro Transportation Department Review of the Transportation Element Of The Tualatin Comprehensive Plan

A transportation staff review of the City of Tualatin's final draft submittal of their Comprehensive Plan, Community Development Code and Urban Renewal Plan has identified several issues which should be addressed as part of our plan review process. However, in general the plans from a transportation perspective are satisfactory and meet or exceed planning requirements.

We have identified a number of issues which should be discussed further with the City of Tualatin. The following issues have been identified:

Norwood Road/I-5 Interchange Issue

The City of Tualatin proposes improved access to Interstate 5 via a proposed interchange at the intersection of I-5 and Norwood Road. The rationale for the interchange is to reduce the impact on the Nyberg Street/Tualatin-Sherwood Road corridor from development of industrial land located in Washington County west of the City. The plan proposes preservation of right-of-way for a new I-5 interchange at Norwood.

This proposal conflicts both with ODOT policies and Metro findings. ODOT is extremely reluctant to provide new access to its system of freeways and has indicated their concern for providing additional access at this location. Metro analysis of the I-5/99W corridor has indicated an existing imbalance between traffic flows on I-5 and 99W. While I-5 presently has excess capacity, 99W has been found to be capacity deficient. However, our analysis has also indicated that by 1995 both I-5 and 99W will both be at or above capacity. The increased subregional corridor travel flows will reduce the benefits from projects attempting to improve east/west connectivity between the two facilities and the areas located between them.

Public Transit Goal Issue

The plan establishes the goal of Tualatin to be provided with public transportation service so that every citizen is within a two to three block walk of a bus line. Although this goal appears admirable, it is probably unrealistic when considering existing levels of transit service, transit funding limitations and residential development patterns. Tri-Met should be consulted on this.

Special Transportation Issue

The Tualatin plans fail to discuss transportation facilities and services provided for the transportation disadvantaged. This issue should be included in subsequent drafts.

Nyberg Bypass

The Urban Renewal Plan proposes a new bypass of Nyberg Street west of 80th. The bypass would provide a more direct through route connecting with Tualatin-Sherwood Road. The urban renewal plan should discuss the social, economic, environmental and energy benefits of the proposal.

Functional Classification Consistency Issues

A comparison of the functional classification of highway facilities designated in the Tualatin Comprehensive Plan and the designations in the Regional Interim Transportation Plan (ITP) has identified a number of inconsistencies. The inconsistencies identified in this memo should be discussed with Tualatin. A comparison of the functional classification definitions used in each plan is also discussed. A map showing the functional classification of facilities is not included in any of the Tualatin plan documents and this should be added.

The ITP has four functional classifications to describe the highway system--Collectors, Minor Arterials, Other Principal Arterials, and Freeways/Expressways. The City of Tualatin has six functional classifications--Freeway, Expressway, Arterial Street, Collector Street, Local Street, Cul-de-Sac Street. Each of the ITP classifications has its counterpart in the higher level Tualatin classifications as detailed in Table 1.

TABLE 1

Functional Classification Definition Equivalency

<u>Hierarchy</u>	<u>ITP</u>	<u>City of Tualatin</u>
1	Freeways/Expressways	Freeway, Expressway
2	Principal Arterial	Arterial
3	Minor Arterial	Arterial
4	Collector	Collector

Freeway/Expressway

The City of Tualatin describes a freeway as the highest form of roadway design. This type of facility is intended to provide for the expeditious movement of large volumes of traffic between, across, around or through a city, region or state. The Tualatin designation is equivalent to the ITP Freeway/Expressway description.

Principal Arterial & Minor Arterial

The Tualatin Plan does not differentiate between a Principal arterial and a Minor Arterial.. Tualatin specifies that the primary function of an arterial street is to provide for the traffic movement between areas and across portions of a city or region, direct service to principal generators and connect to the freeway-expressway system. A subordinate function is the provision of direct access to abutting land. Since the primary function of this type street is movement of vehicles, arterial streets are subject to regulation and control of parking, turning movements, entrances, exits and curb uses. control of access may also be required. Traffic volumes generally range between 5,000 and 35,000 vehicles per weekday. Roughly then the Tualatin arterial designation relate to the ITP Principal and Minor arterial.

Collectors

Tualatin specifies that a collector functions to conduct traffic between arterial streets activity centers and neighborhoods. It is a principal traffic carrier within a neighborhood and also