

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING)	RESOLUTION NO. 80-181
AN ACCEPTANCE OF THE CITY OF)	
GRESHAM'S REQUEST FOR ACKNOW-)	Introduced by the Regional
LEDGMENT OF COMPLIANCE WITH)	Planning Committee
THE LCDC GOALS)	

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 Gresham 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, Gresham's Comprehensive Plan has been evaluated for compliance with LCDC goals and regional plans adopted by CRAG or Metro prior to June, 1980, in accordance with the criteria and procedures contained in the "Metro Plan Review Manual" as summarized in the staff reports attached as Exhibit "A" and "B"; now, therefore,

BE IT RESOLVED,

1. That the Metro Council recommends to LCDC that Gresham's request for compliance acknowledgment be approved.

2. That the Executive Officer forward copies of this Resolution and Staff Report attached hereto as Exhibits "A" and "B" to LCDC, city of Gresham and to the appropriate agencies.

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

ADOPTED by the Council of the Metropolitan Service District
this 25th day of September, 1980.



Presiding Officer

MB:gl
149B/135

THIS 25th DAY OF September 1980

Agenda Item 6.2

Cynthia M. Wickham
 A G E N D A ~~C L E M A N A G E M E N T~~ S U M M A R Y

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

I. RECOMMENDATIONS:

- A. ACTION REQUESTED: Adoption of the attached Resolution No. 80-181 recommending that LCDC grant a continuance of the city of Gresham's request for compliance. The Council should act on this item at its September 25 meeting in order to ensure that its recommendation is considered by LCDC (see background).
- B. POLICY IMPACT: This Metro acknowledgment recommendation was developed under the "Metro Plan Acknowledgment Review Schedule," June 20, 1980. This will help establish a basis for future acknowledgment review procedures and Metro Council action on compliance acknowledgment requests whereby interested parties are encouraged to participate in a work session to discuss plan acknowledgment issues prior to Regional Planning Committee action.
- C. BUDGET IMPACT: None

II. ANALYSIS:

- A. BACKGROUND: Gresham submitted its plan to LCDC for acknowledgment in June, 1980. LCDC's hearing on the City's request for acknowledgment is scheduled for October 30-31, 1980.

Metro conducted a draft review of Gresham's plan in April, 1980, and identified a number of deficiencies (see Exhibit "B"). Most of the deficiencies have been corrected through subsequent amendments to the plan.

Gresham has experienced a tripling of its population since 1970. The City is projected to grow from 31,725 (1979) to 52,000 by the year 2000. The plan calls for a 47/53 single family/multi-family new construction housing ratio with an overall housing density of 10 units per net acre.

The Gresham plan deficiencies include 1) plan contains vague and discretionary approval standards for new residential development (Goals #2 and #10), and 2) plan is not consistent with all provisions of the "Interim Johnson Creek Basin Stormwater Runoff Plan" (Goals #2, #6 and #7). The city of Gresham anticipates adopting plan amendments which adequately address the above deficiencies

prior to Metro Council action on this matter scheduled for September 25, 1980. If this occurs and the amendments are found to address adequately the acknowledgment issues raised by Metro, the Regional Planning Committee recommends Gresham's request for acknowledgment be granted.

The Metro staff report and recommendation was prepared as per the "Metro Plan Acknowledgment Review Schedule," June 20, 1980. Under the previous Metro review procedures, the Regional Planning Committee (RPC) was provided with a complete Plan Acknowledgment Review report and staff recommendation for each jurisdiction seeking plan acknowledgment. Under the current June 20 schedule, the RPC was provided with an "Acknowledgment Issues Summary" report for the Gresham plan as developed through a "Plan Review Work Session," in which the jurisdiction and interested parties participated. The Summary identified all acknowledgment issues raised at the "Plan Review Work Session," areas of agreement, and the Metro staff position on areas where differences were not resolved, including the rationale for this position and the impacts of alternatives considered.

The Committee received and acted upon the report and recommendations prepared by Metro staff, providing in the process further opportunity to hear comment from interested parties.

The Council will receive and act upon the RPC recommendation, receive any additional testimony and adopt a final recommendation on acknowledgment requests for compliance with Statewide Planning Goals. In so doing, the Council should determine the Metro comment to the LCDC on those matters, if any, which remain the subject of differing opinion and discussion. The Council should either state the Metro policy on such subjects or request of the LCDC a clarification of State policy. And, the Council should determine whether and in what manner it wishes the subject to be pursued with the DLCD or before the LCDC.

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

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Gresham Acknowledgment ReviewIntroduction

The city of Gresham is located in the urban area of East Multnomah County, just 16 miles from downtown Portland. The City's population has tripled since 1970 from 10,000 to 31,725 (1979). Gresham is projected to reach a population of 52,000 by the year 2000. The corporate city limits encompass about 15 square miles.

The Gresham plan sets out policy and land use designations for land within the city limits only and is, therefore, a "complementary" plan.

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

Metro's Draft Review of Gresham'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 Gresham'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 the city of Gresham's request for acknowledgment be continued to correct deficiencies of regional concern identified under Goals #2, #6, #7 and #10. Metro would also like to extend their congratulations to the city of Gresham for a most thorough and imaginative job.

General Requirements

All general requirements have been met and all necessary documents have been included in the comprehensive plan package submitted for acknowledgment.

Gresham has projected a city limits year 2000 population of approximately 52,000, which is consistent with Metro's "208" projections.

The City has included the following "opening language" which is adequate for compliance:

- "5) The Comprehensive Plan and each of its elements shall be opened for amendments that consider compliance with the Goals and Objectives and Plans of the Metropolitan Service District (MSD) or its successor on an annual basis and may be so amended or revised if deemed necessary by the City Council. Annual amendment and revision for compliance with the above regional goals, objectives and plans shall be consistent with any schedule for reopening of local plans approved by the Land Conservation and Development Commission (LCDC)."

(Volume II, p. 6)

Conclusion: The City has adequately satisfied all general requirements.

Goal #1 Citizen Participation

The City's Committee for Citizen Involvement was appointed in September, 1977, followed by the hiring of a Citizen Involvement Coordinator a month later. Task force groups were then organized around Goal topics to assist in developing the comprehensive plan.

An evaluation of the Citizen Participation Process was conducted in April, 1980, utilizing a citywide random sample survey. While survey results indicated a few changes were needed, overall, the process has been effective.

Following plan acknowledgment, policy calls for the establishment of task forces and citizen advisory groups to carry out the City's Citizen Involvement Program. (Volume II, p. 8)

No Goal #1 violation complaints have been received by Metro regarding the City's Citizen Involvement Program.

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

Goal #2 Land Use Planning

The Gresham plan and implementing measures are contained within three documents submitted for acknowledgment: Volume I, "Findings" Volume II, "Policies and Summary;" and Volume III/IV, "Code and Standards."

The city of Gresham/Multnomah County Urban Planning Area Agreement (UPAA) became effective on May 31, 1979. The County's plan applies to all unincorporated lands within the Urban Planning Area.

A major review of plan policies and implementing strategies will be conducted every two years to ensure the plan is kept up-to-date.

As discussed under Goal #10 of this review, Section 10.3400 of the "Code" contains vague and discretionary approval standards for development in the "Developing District."

The Gresham plan does not comply with all policies and standards of the "Interim Johnson Creek Basin Stormwater Runoff Plan." This issue is addressed under Goal #6 of this review.

Conclusion: The City does not comply with the regional requirements under Goal #2. In order to comply, the City must:

1. Either amend section 10.3400 of the "Code" so as to include clear and objective approval standards or adopt qualifying language which ensures that planned densities will not be reduced, development costs will be minimized, and needed housing types will not be excluded as a result of the application of Section 10.3400.
2. Adopt plan/implementing measures which carry out items B-9 and C-1 of the "Interim Johnson Creek Basin Stormwater Runoff Plan."

Goal #3 Agricultural Lands

Conclusion: Not applicable for cities within an adopted Urban Growth Boundary.

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 the regional requirements under Goal #4.

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

Three aggregate resource sites (Rogers Const. Co., Gresham Sand & Gravel Co. and Columbia Brick Works, Inc.) are identified as being within the City. This finding is consistent with the Oregon Department of Geology and Mineral Industries (ODGMI) study, 1978.

The following plan policy calls for the protection of these resources:

"It is the City's policy to protect areas with mineral and aggregate resources and to allow extraction from existing sites where such activities do not violate State and federal environmental quality standards and/or the public health, safety and welfare."

(Volume 11, p. 19)

All three aggregate sites are zoned for industrial development, whereby "extraction" of the resources is permitted, subject to meeting environmental standards. (See Volume IV, Section 2.0400 and 4.0800.)

With regard to plan consistency with The Urban Outdoors, CRAG, 1971; the Gresham plan has designated areas for open space, both existing and proposed (Volume I, p. 96) consistent with the "Outdoors" study. The "Bikeways for Gresham," 1974, referenced in the plan (Volume I, p. 131) calls for the establishment of bikeways which are consistent with The Urban Outdoors.

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

Goal #6 Air, Water and Land Resources Quality

The City's plan does reference the Air Quality State Implementation Plan (SIP), Metro, 1979, (Volume II, p. 23), and contains up-to-date information on air quality in the Portland/Vancouver Air Quality Maintenance Area (AQMA) consistent with the SIP. The plan properly identifies DEQ's and Metro's responsibility in addressing air pollution problems within the region. The plan also contains a discussion on the DEQ Emission Offset Policy (Volume I, "Supplement," p. 2) which is pertinent to new industrial development in Gresham. Plan policy calls for the maintenance and improvement of the City's air quality. The plan's implementation strategy most relevant to the region is included below:

- "6) The City will cooperate and work with MSD and DEQ to realize the goal of air quality attainment as described in the SIP. Until such time as control strategies are realized, Gresham will use measures described in the DEQ Handbook for "Environmental Quality Elements of Oregon Local Comprehensive Land Use Plans," when planning any development activities, having the potential to directly (by direct emissions), or indirectly (by increasing vehicular travel), affect air quality."

(Volume II, p. 24)

Gresham lies within the Johnson, Kelly and Fairview Creek drainage basins. Water quality of both surface and groundwater are noted as having no serious problems. The plan includes a good description of water quality in Johnson Creek. The following plan language is minimally adequate to ensure coordination with regional waste water treatment plans and policies:

- "3) The City shall work with the Metropolitan Service District and other affected jurisdictions to formalize collection and

treatment service area boundaries and to plan major waste treatment facilities. The City recognizes and assumes its responsibility for operating, planning and regulating waste water systems as designated in MSD's Waste Treatment Managment Component."

(Volume II, p. 54)

Consistency with the "Interim Johnson Creek Basin Stormwater Runoff Plan"

On January 24, 1980, the Metro Council adopted the "Interim Johnson Creek Basin Stormwater Runoff Plan" which applies to the Johnson Creek Drainage Basin. Under this plan, Gresham is required to adopt plan provisions and implementing measures sufficient to carry out the terms of the "Guidelines" by July 1, 1980. For the record, the extent to which the Gresham plan carries out the policies and standards contained within the "Guidelines" is discussed below under the three headings identified in the Guidelines (A. Floodplain and Floodway Policies, B. Drainage Policies and C. Vegetation Policies):

- A. Floodplain and Floodway Policies: The city of Gresham is a participant in the National Flood Insurance Program. Plan policy and implementing measures call for the prohibition of development within the 100-year floodplain, permitting only open space, greenways, park land and recreational trail uses (re: Volume II, p. 13). Plan provisions (Volume III, p. 10-1 and Volume IV, Section 2.0523, p. 47) together with the requirement to obtain a Corps of Engineer permit, ensure landfills will not take place within the floodway.
- B. Drainage Policies: The Gresham "Community Development Code and Standards" require all future developments to submit a drainage plan which addresses nearly all concerns identified under Section B, Drainage Policies of the Johnson Creek Guidelines. The various elements which must be included within the "drainage plan" are delineated below:

"Section 6.0240 - Drainage Management Practices

"In the absence of a drainage basin master plan, a development may be required to employ drainage management practices which minimize the amount and rate of surface water runoff into receiving streams. Drainage management practices may include, but are not limited to:

- a. Temporary ponding of water;
- b. Permanent storage basis;
- c. Minimization of impervious surfaces;
- d. Emphasizing natural water percolation and natural drainageways;

- e. Prevention of water flowing from the roadway in an uncontrolled fashion;
- f. Stabilization of natural drainageways as necessary below drainage and culvert discharge points for a distance sufficient to convey the discharge without channel erosion;

"Runoff from impervious surfaces shall be collected and transported to a natural drainageway with sufficient capacity to accept the discharge.

"Section: 6.0250 - Standard Engineering Specifications

(to be included at a future date)"

(Volume IV, p. 130)

"Section: 3.1033 - Required Drainage Facilities

- "A. All roof and foundation drains shall be discharged to either curb face outlets (if minor quantity), to a public or approved private storm drain, or to a natural acceptable drainageway if adjacent to the lot.
- "B. All private stormlines, roof and foundation drains to a creek system shall be percolated.
- "C. Private storm drainlines will be required to convey any concentration of run-off across adjoining properties so as to reach an acceptable drainage facility. Private drainage easements shall be established on the deeds or on the recorded plat face of the parcels involved with any required private drainage easements.
- "D. Subsurface drainage facilities may be required in areas of fill if it is so determined by the geologist or soils engineer that there will exist a groundwater situation that could cause stabilization problems. Any subsurface natural spring or field tile shall be piped to an approved drainage facility.

"E. Any development that is down grade from an undeveloped parcel of ground shall intercept and divert the storm water runoff to an approved storm drainage facility. The diversion ditch may not exceed a 5 percent slope, unless improved with an acceptable erosion control method as determined by the City Manager. In addition to the division ditch an interceptor pipe may be required. If the cutoff ditch and interceptor pipe is located on public open space, an easement for maintenance purposes will be established for those properties benefited by the facility."

(Volume IV, p. 89)

"Section: 6.0230 - Effect on Downstream Drainage

"Where it is anticipated that the additional runoff incident to the development will overload an existing drainage facility, the approval authority shall withhold approval of the development until provisions have been made for improvement of said potential condition.

"Section: 3.1040 - Soil Erosion Measures During Construction:

Unless otherwise approved, the following standards are adopted as a minimum requirement for the purposes of minimizing soil erosion. The final program for soil stabilization may vary as site conditions and development programs warrant. These minimum guidelines are not intended to resolve all project soil erosion conditions. The applicant for a development permit is ultimately responsible for containing all soil on the project site.

"A. The plans and specifications will demonstrate the minimization of stripping vegetation on the project site.

"B. If top soil is to remain stockpiled during a rainy season, seeding or other stabilization measures are required.

"C. All areas which will, by necessity, be left bare after September 30th shall be seeded to a cover crop (i.e., cereal rye, annual rye grass, perennial rye grass). Mulching and mulching with landscaping is a viable alternative to seeding. Areas in excess of

10 percent slope must be mulched prior to seeding. If, by October 15th, seeding has not established itself to the point of being an effective erosion control device, straw bale filters may be required. Regular inspection and removal of sediment may be required to maintain the effectiveness of the erosion control device.

- "D. Unless an equally effective alternative method is approved by the city of Gresham, stripped slopes in excess of 100 ft. left bare during the winter months will require continuous lines of staked straw bales for erosion control purposes. The lines of straw bales shall be stacked and anchored at 100 foot intervals for large stripped areas. Topographical and soil conditions may require that the 100 foot interval be reduced.
- "E. Means shall be devised to prevent sediment laden water from entering any storm sewer facilities. Use of straw bales and/or other materials to filter sediment from water entering storm sewer systems will be required.
- "F. In areas of concentrated flow, temporary diversion berms, chutes or downpipes and down drains sized for a two-year storm may be required for projects left incomplete during the winter months.

Temporary check dams may be required to channels carrying sufficient amounts of water to cause channel scouring and erosion.

- "9. The Community Development Standards Document shall prohibit the alteration of natural drainageways except where approved by the City Engineer for road crossings and drainage improvements."

(Volume II, 10.333, p. 57)

As required under item #9, Section B, Drainage Policies of the Guidelines:

"The rate of runoff from a developed site during a 25-year recurrence interval storm shall not exceed the predevelopment rate of runoff

released based on a 10-year recurrence interval storm as defined by each jurisdiction..."

(p. 4)

While a "Site Hydrology Report" would be required of developments within the Johnson Creek Drainage Basin, and such a report must address the predevelopment rate of runoff, it does not contain a rate of runoff standard consistent with item #9 above.

"Section: 3.1013 - Site Hydrology Report

"Any site hydrology report which may be required under Section 3.1010, Plans and Specifications, shall include the following:

- "A. A map and calculations showing the drainage area and estimated runoff of the area being served by any drainage facility within the proposed grading and drainage plan.
- "B. Indication of the undeveloped peak discharge of surface water currently entering and leaving the subject property due to the 10 year design storm. Adjusted to the subject drainage basin;
- "C. Indication of developed peak discharge of runoff which will be generated due to the design storm within the subject property;
- "D. Determination of the developed peak discharge of water that will be generated by the design storm at various subbasins on the subject property; and
- "E. A discussion of the drainage management facilities and/or techniques which may be necessary to rectify drainage problems."

(Volume IV, p. 87)

- C. **Vegetation Policies:** The Gresham plan contains adequate provisions to ensure slope stabilization and the revegetation of land during and after the construction period (re: Volume IV, Section 3.1050, pp. 87-90). However, adequate provisions for the protection and enhancement of riparian vegetation has not been provided. The "Johnson Creek Guidelines" specifically state:

"Riparian vegetation that protects stream banks from eroding shall be maintained or enhanced along major drainageways for a minimum of 20 feet from the channel bottom

centerline plus one additional foot for each one percent of bank slope greater than ten percent; along minor drainageways for a minimum of ten feet from the channel bottom centerline plus one additional foot for each one percent of slope greater than ten percent; along seasonal drainageways for a minimum of ten feet from the channel bottom centerline. This standard policy should not be construed to mean that clearing of debris from the streambed itself is prohibited; normal clearance of the streambed to allow for unimpaired flow of water is encouraged."

(pp. 5 - 6)

In summary, the city of Gresham has not adopted measures adequate to carry out all policies of the "Interim Johnson Creek Basin Stormwater Runoff Plan." In order to comply, the City must adopt plan/implementation measures which more adequately address items B-9 and C-1 of the Guildines.

Conclusion: The City does not comply with the regional requirements under Goal #6. In order to comply, the City must:

- . Adopt plan/implementation measures which adequately carry out items B-9 and C-1 of the "Interim Johnson Creek Basin Stormwater Runoff Plan."

Goal #7 Lands Subject to Natural Hazards

The Gresham plan contains an excellent identification and analysis of natural hazards in the Gresham area. Base maps which identify areas with geologic, soils, slopes and floodplain constraints to development are included.

Plan policies are implemented mainly through the "Community Development Code and Standards." For hillside development, a developer may select the option to either adjust the minimum lot size according to the percentage of slope or utilize a density transfer to less constrained lands. An environmental report, which addresses soils, geology and hydrology is required of developers desiring to build on a hillside (i.e., slopes greater than 15 percent). A grading plan and vegetation and revegetation reports are required as well. Except for open space, greenways, park land and recreational trails, all other uses are prohibited within the 100-year floodplain.

Consistency with the "Interim Johnson Creek Basin Stormwater Runoff Plan," 1979, is discussed under Goal #6 of this review and found not to be in compliance.

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

- . Adopt plan/implementation measures which adequately carry out items B-9 and C-1 of the "Interim Johnson Creek Basin Stormwater Runoff Plan."

Goal #8 Recreational Needs

Gresham has presented a good inventory and analysis of the City's open space/greenway/park system. To date, the City has required land dedication of subdividers where lands are shown to be hazardous for building sites, resulting in the dedication of 165 acres of open space along the City's creeks.

The proposed greenways and bikeways are consistent with "The Urban Outdoors" study as discussed under Goal #5 of this review.

Plan policy calls for the City to:

"...assure the availability of recreational lands and facilities which will meet the recreational needs of all Gresham residents and visitors that can be provided in an urban setting."

(Volume II, p. 66)

"...to ensure the availability of sufficient open space for all areas of the City; to meet the recreational needs of all age groups; and to locate open spaces so as to protect natural resources and minimize hazards to life and property."

(Volume II, p. 38)

To implement the above policies, the "Development Code and Standards" provide for density transfers where slopes exceed 15 percent (Section 2.0510), prohibit development within the floodplain and require land dedication or a systems development charge of all developers of subdivisions, multi-family dwellings or mobile home subdivisions.

While the park donation/fee approach is adequate for implementing the policies under Goal #8, questions have been raised regarding the impact of this strategy on the cost of new housing. This issue is discussed in further detail under Goal #10 of this review.

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

Goal #9 Economy of the State

The City has allocated 456 acres for commercial development. Of this acreage, 260 are developed, 40 acres are committed to a regional shopping center and the balance of 156 acres are vacant.

Due to the anticipated development of the light rail line and its terminus at the Gresham Central Business District (CBD), the downtown area is expected to experience major new commercial development. A "Transit Impact District" has been formed for the CBD with a master plan for the area underway.

Over 572 acres are designated for industrial use of which 300 acres are developed. Of those industrially designated lands, only 74 acres are developed for industrial purposes. Gresham is encouraged, however, that locally based, nonpolluting industry will be locating within the community in the near future.

Plan policy calls for the encouragement of commercial and industrial development, implemented through the "Development Code and Standards" document. The "Code" and "Standards" are especially focused on compatibility with adjoining uses, transportation efficiency, energy conservation and crime prevention through design. As noted under Goal #6 of this review, a discussion on the DEQ Emission Offset Policy is included in the plan.

Noise level and air quality standards have been established for industrial developments (Volume IV, Section 2.0312).

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

Goal #10 Housing

The Gresham plan contains an excellent housing needs/demand analysis. Low and moderate residential development is allowed in the low and moderate density residential districts and high density residential development allowed within the CBD.

As indicated below, the City more than meets their regional responsibility of providing for a 50/50 single family/multi-family new construction housing ratio.

Single Family/Multi-Family Housing Ratio

	<u>Existing Units</u>	<u>Planned New Construction</u>	<u>Build-Out</u>
SF	7,954 ¹ (66%)	10,863 ² (47%)	18,817 (53%)
MF	4,124 (44%)	12,440 ³ (53%)	16,564 (47%)
Total	12,078 (100%)	23,303 (100%)	35,381 (100%)

(Source: "Overall Housing Capabilities," Revised, Volume I, p. 92, August 27, 1980, and Memo to Metro, 8/14/80)

¹Figure includes 380 mobile homes.

²Figure includes units on vacant buildable lands only (i.e., on slopes less than 15 percent).

³Figure represents an average between the minimum and maximum (9,952 - 14,928 units) allowable based upon continuance of current densities/complete infill at full potential.

Not shown on the above table is the provision for duplexes in the low density district on lands within 275 feet of a street of at least arterial street status (at a minimum lot size of 4,000 sq. ft. per living unit), the provision for allowing all development to be attached (i.e., multi-family) on 7,000 sq. ft. lots and the provision for about 3,120 to 5,460 multi-family units (at a minimum lot size of 1,815 sq. ft. per unit) in the Commercial Development District.

There are 2,217 gross acres of land allocated for development in the low density zone for a single family density of 6 Units per Net Acre (UNA). About 622 acres have been allocated to the moderate density zone for a multi-family density of 25 UNA. This results in an overall (SF and MF) density of 10.3 UNA. (Note: 20 percent has been subtracted from the gross acreage figures for streets.)

The City has established three major classification districts (Established, Developing and Redeveloping) within which the development approval process and standards vary. The following approval standards, for development within a "Developing District" as per Section 10.3400, Volume III of the "Code and Standards" document are vague and discretionary:

"(2) Except as otherwise provided in section 10.3412, in an urban developing district a development is permitted if authorized pursuant to the Type III procedure and determination that the development is consistent with any emerging patterns of area development, in addition to compliance with the comprehensive plan, other requirements of this code and applicable standards...." Emphasis added. (pp. 10-19)

While the plan does not contain an analysis on the need for mobile homes, mobile homes are encouraged by plan policy (Volume II, p. 30) and are allowed in subdivisions (minimum 4 acre site) in the moderate density residential district at a minimum lot size of 4,300 sq. ft. per unit. It is questionable whether mobile homes at 10 units per acre can effectively compete with multi-family development (also allowed in the moderate density district) at 24 units per acre. However, given that the opportunity exists for all residential development to be constructed as multi-family units, the allowance for densities considerably in excess of the Metro UGB assumption, several innovative implementing measures which provide certainty to the developer as to the approval requirements and processing time, and the option to transfer densities from lands constrained by steep slopes, the provision for mobile homes is superfluous to compliance with Goal #10.

The city of Gresham is not a participant in the Areawide Housing Opportunity Plan (AHOP). The City has included findings contained within the AHOP which identify 456 households in need of housing assistance in Gresham. Policy calls for the development and adoption of a "Housing Assistance Plan" for the City and the possible creation of a local authority to administer the plan.

As referenced under Goal #8 of this review, the Gresham plan (as per Volume IV, Section 4.0900) requires developers of subdivisions, multi-dwelling structures, or mobile home subdivisions to either dedicate land for recreational/open space use or pay a comparable development charge. The park land dedication/fee is based on a formula by which the developer pays one-third the costs of new park land based on a 1 acre/100 people park standard. This results in about a \$170 fee for each single family unit and a \$120 fee for each multi-family unit. We find this fee to be reasonable and justified.

Conclusion: The City does not comply with the regional requirements under Goal #10. In order to comply, the City must:

Either amend section 10.3400 of the "Code" so as to include clear and objective approval standards or adopt qualifying language which ensures that planned densities will not be reduced, development costs will be minimized, and needed housing types will not be excluded as a result of the application of Section 10.3400.

Goal #11 Public Facilities and Services

Gresham's major water source is Portland's Bull Run Reservoir. Water distribution is carried out by three special districts (Powell Valley Road District, Rockwood District and Lester Water District) and the city of Gresham, with the City being the major water purveyor. The Gresham Master Water Plan calls for improvements adequate to maintain a sufficient water supply. The efficiency of operating four separate water distribution systems is of concern to the City. Plan policy calls for the City to assume responsibility for providing water service to all residents within the City. Future water service facilities shall be developed as per a (yet to be developed) joint City/Special District(s) water facilities capital improvements program.

Sewage treatment is provided by the city of Gresham, serving Gresham, Wood Village, Fairview and a small portion of unincorporated Multnomah County. Treatment facilities are adequate to provide service only to 1983. Gresham is part of a consortium with Multnomah County and Troutdale aimed at obtaining Environmental Protection Agency (EPA) funds to determine the long-range strategy for sewage treatment in the East County area. There is also a need for collection system improvements.

The Gresham plan includes the required coordination language as follows:

"The City shall work with the Metropolitan Service District and other affected jurisdictions to formalize collection and treatment service area boundaries and to plan major waste treatment facilities. The City recognizes and assumes its responsibility for operating, planning and regulating waste water systems as

designated in MSD's Waste Treatment Management Component."

(Volume II, p. 54)

Policy is implemented through the City's Capital Improvement Program and Development Permit process.

Subsurface disposal units are permitted only on lots of record subject to the following policies:

- "1. If the property is currently being served by a subsurface disposal and that system is malfunctioning, the system may be replaced with subsurface disposal providing sanitary sewer is not directly available to the property.
- "2. Subsurface disposal may be allowed in a developed area if the majority of that area is currently served by subsurface disposal and it is unlikely that sanitary sewer will be made available in the next five years.
- "3. The minimum size for any newly created lots for which subsurface disposal will be allowed is 15,000 square feet.
- "4. The property must be approved by the Multnomah County Sanitarian for subsurface disposal.
- "5. If sanitary sewer is or will be available to the property in one year, subsurface disposal will not be allowed.
- "6. No subsurface disposal will be allowed in the Kelly Creek and Johnson Creek Interceptor drainage basins.
- "7. No new subdivision, commercial, industrial, multi-family or duplex shall be approved for subsurface disposal.
- "8. Only one subsurface disposal connection will be granted per lot. No subdivision of the property will be allowed until sanitary sewer is available.
- "9. In exchange for granting the request, the property owner shall sign an agreement stating that:

- a. The applicant must sign an agreement stating that the owner, heir, assigns, etc., will not remonstrate against the construction of sanitary sewer.
- b. At such time as a public sewer becomes available to a property served by a private sewage disposal system, a direct connection shall be made to the public sewer in compliance with Ordinance 390.

"10. If strict enforcement of these policy guidelines would require unreasonable or disproportionate expenses to the property owner or cause extreme financial hardship to the property owner, an appeal may be directed in writing to the City Council setting forth the reasons for the requested exemption and such further information as may be required. After investigating the appeal, the City Council may grant or refuse the exemption or may grant it for a limited time or upon reasonable conditions."

(Volume I, pp. 145-146)

The Gresham plan contains an extensive discussion on storm drainage problems and a thorough review of mitigating measures which could be taken to both reduce the amount of runoff and improve the quality of stormwater runoff.

As noted under Goal #6 of this review, Gresham lies within the Johnson, Kelly and Fairview Creek drainage basins, all three of which are subject to periodic flooding. To date, "Drainage Master Plans" have not been developed for the three drainage basins, although such "Master Plans" are slated for development in the near future. During the interim, the "Community Development Code and Standards" requires developers to submit a drainage plan which:

"...emphasizes the use of natural drainageways; investigates the feasibility of detention ponds or other holding facilities; minimizes amount of impervious surfaces; provides stormwater easements conforming substantially to natural drainageways; maintains unrestricted flow from runoff originating elsewhere; allows a mechanism to control the rate of runoff discharge so that excess capacity of drainageways does not occur; protects each structure and lot from runoff damage; ensures that downstream properties and/or structures will not be harmed by runoff originating from the development; and connects to an approved drainageway."

(Volume II, p. 56)

In addition, the "Development Code and Standards" document establishes standards for grading and drainage, soil erosion measures during construction and revegetation cover after grading (Volume IV, sections 3.1000 - 3.1060).

The plan contains a good description of solid waste problems within the region, recognizes Metro's and DEQ's role in solid waste and notes the existence of plans for the "Resource Recovery Plant" at the Rossman's Landfill site and the Solid Waste Transfer Station at SE 174 and Powell Blvd. (Volume I, p. 84 and 155)

Plan policy on solid waste management is as follows:

"It is the policy of the City to continue the present solid waste collection franchise system and to use the franchise application and renewal process to encourage recycling efforts by collectors. The City recognizes MSD's responsibility and authority to prepare and implement a solid waste management plan, supports the MSD "Procedures for Siting Sanitary Landfills" and will participate in these procedures as appropriate."

(Volume II, p. 58)

Conclusion: The City complies with the regional requirements under Goal #11.

Goal #12 Transportation

A complete analysis of existing and anticipated transportation system problems has been presented. Excessive traffic volumes are anticipated for Burnside, Powell, 181st Ave. and Hogan. Trafficway improvements have been proposed which will help relieve traffic congestion on the above streets (except Hogan).

The plan commits the City to:

"...coordinate transportation planning with other agencies and surrounding jurisdictions such as the East Multnomah County Cities, Multnomah County, the Metropolitan Service District, Tri-Met and the Oregon Department of Transportation."

(Volume II, p. 43)

Transportation service for the transportation disadvantaged is addressed adequately through the following City commitment:

"The City shall work with transit providers to encourage transit service that addresses the special needs of transit dependent population, e.g., the elderly, the handicapped and the poor."

(Volume II, p. 43)

Transportation policies are implemented mainly through the "Community Development Code and Standards" and (yet to be developed) "Capital Improvements System" plan.

Light Rail Transit

Gresham has been selected as the terminus for the East County leg of the "Eastside Transitway" project. The City has recognized the opportunity to use the light rail system to significantly alter travel modes in Gresham and foster economic development in the Gresham CBD.

The City commits itself to participate in the overall "Transit Corridor Master Planning" process (Volume II, p. 44). Plan policy calls for the support of transit alternatives:

"It is the policy of the City to encourage expanded transit service within Gresham and the East Multnomah County region with an emphasis on improved local transit service."

(Volume II, p. 44)

"It is the policy of the City to encourage transit service to: (1) meet the current and projected transportation needs of the citizens of Gresham; (2) provide alternative methods of transportation; (3) reduce the need for expanded street and parking facilities; and (4) work toward conserving energy and reducing air pollution."

(Volume II, p. 45)

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

Goal #13 Energy Conservation

An extensive discussion on energy use both nationally, regionally and locally is presented in the plan. Gresham's municipal energy use is analyzed consistent with the "CRAG Regional Energy Analysis," Report 2, CRAG, 1977. Also included is a good discussion on the local potential for utilizing wind and solar power systems.

Plan policies are implemented mainly through the land use plan (with an emphasis on mass transit and options for multi-family developments), the "Community Development Code and Standards" (which includes several design standards aimed at conserving energy in new developments) and through an energy conservation element of the (yet to be developed) City's Capital Improvement Program.

Conclusion: The city complies with the regional requirements under Goal #13.

Goal #14 Urbanization

Gresham's city limits are coterminous with Metro's UGB and, hence, must recognize the UGB in the plan and the process for its amendment. The City has met both of these requirements as included in the "Gresham Community Development Plan" Volumes III and IV pages 20-21.

All land within the City is designated "immediate urban" where a full range of urban services are available. Therefore, the plan satisfies the four conversion factors of Goal #14.

Conclusion: The City complies with the regional requirements under Goal #14.

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