

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING A)	RESOLUTION NO. 80-196
CONTINUANCE OF THE CITY OF)	
TROUTDALE'S REQUEST FOR)	Introduced by the Regional
ACKNOWLEDGMENT OF COMPLIANCE)	Planning Committee
WITH 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 Troutdale 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, Troutdale'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"; and

WHEREAS, Metro finds that Troutdale's Comprehensive Plan does not comply with the LCDC Goals #2, #5, #10 and #14; now, therefore,

BE IT RESOLVED,

1. That the Metro Council recommends to LCDC that Troutdale's request for compliance acknowledgment be continued to correct deficiencies under Goals #2, #5, #10 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 "B" to LCDC, city of Troutdale 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 Troutdale's plan for consistency with regional plans and notify the city of Troutdale of any changes that may be needed at that time.

ADOPTED by the Council of the Metropolitan Service District
this 20th day of November, 1980.



Presiding Officer

MB:gl
926B/135

A G E N D A 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 Troutdale's
Request for Acknowledgment of Compliance with LCDC Goals

I. RECOMMENDATIONS:

- A. ACTION REQUESTED: Recommend the Council adopt the attached Resolution No. 80-196 recommending that LCDC grant a continuance of the city of Troutdale's request for compliance. The Council should act on this item at its November 20 meeting in order to ensure that its recommendation is considered by LCDC (see background).
- B. POLICY IMPACT: This acknowledgment recommendation was developed under the "Metro Plan Acknowledgment Review Schedule," June 20, 1980. This process provides jurisdictions an opportunity to work with Metro staff and interested parties to discuss and clarify acknowledgment issues prior to Regional Planning Committee action.
- C. BUDGET IMPACT: None

II. ANALYSIS:

- A. BACKGROUND: Troutdale submitted its plan to LCDC for acknowledgment in August, 1979, and subsequently withdrew it when LCDC found it failed a "completeness check." Troutdale resubmitted its plan in June, and its request for acknowledgment is scheduled to be heard by LCDC on January 29-30, 1981.

Metro conducted a final review of Troutdale's plan in October of 1979, and forwarded a copy of its comments to the City at that time.

Troutdale is a rapidly growing suburban community in east Multnomah County and expects more growth in the next two decades. City and regional forecasts estimate that Troutdale's population will increase from slightly over 5,000 to about 8,000 by the year 2000.

Staff concerns about the Troutdale plan include issues involving Goals #2, #5, #10 and #14. Goal #2 problems arise from a lack of ultimate policy choices and urbanization policies. Goals #5 -- Natural Resources -- lacks adequate implementing measures to protect lands designated as "Greenway" on the Land Use Map. Our Goal #10 -- Housing -- analysis shows that Troutdale has not made adequate provision for needed housing types, has failed to

make ultimate policy choices, has precluded some cost-moderating opportunities with vague and discretionary standards and has neither upzoned nor provided for the upzoning of land designated for more intensive use by the Comprehensive Plan. Finally, the City has not clarified under Goal #14 its reason for distinguishing between immediate and future urbanizable lands in the plan where such distinction has not been made on the Land Use Map.

The Committee's role is to receive the Staff Report, hear further comments from interested parties and act upon the staff's recommendations.

RPC's recommendation will be forwarded to the Council for further discussion and approval of Metro's final recommendation and testimony to 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.

MB:gl
925B/135

EXHIBIT A

TROUTDALE ACKNOWLEDGMENT REVIEW

Introduction

The city of Troutdale is located in the urban area of east Multnomah County, just 19 miles from downtown Portland. The City encompasses only 4.2 square miles with a year 2000 population projected to reach 8,064.

Although the Troutdale plan sets out policy and land use designations for land within the Urban Planning Area (i.e., both incorporated and unincorporated lands), the Multnomah County plan applies to all unincorporated lands. The plan is submitted as a "complimentary" plan and, therefore, Metro's review is limited to lands within the current city limits.

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

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

Metro recommends that the city of Troutdale's request for acknowledgment be continued to correct deficiencies of regional concern identified under Goals #2, #5, #10 and #14.

General Requirements

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

Troutdale has projected a city limits year 2000 population of approximately 8,064 which is consistent with Metro's "208" projections.

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

"This plan, as well as its implementing ordinances and related documents, may also be opened for amendments that consider compliance with the Goals and Objectives of Metro. Annual amendment and revision for compliance with regional goals, objectives and plans shall be

consistent with any schedule for re-opening the Plan which is approved by the Land Conservation and Development Commission." (C.P. p. VII)

Conclusion: The City has adequately satisfied all general requirements.

Goal #1 Citizen Participation

The Citizen's Advisory Committee (CAC) is composed of representatives from six neighborhood districts, with the Planning Commission serving as the City's Committee for Citizen Involvement (CCI).

Citizen input to the planning process has also been enhanced by a series of Citywide surveys/questionnaires.

A Citizen Involvement Program (CIP) evaluation was completed in August, 1980. Overall, the City concluded that the CIP has been effective.

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

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

Goal #2 Land Use Planning

The Troutdale plan and implementing measures are contained within three principal documents titled, "Comprehensive Plan Inventory," "Comprehensive Plan" (policies) and "Comprehensive Plan Documents" (i.e., Zoning Ordinance, Subdivision Regulations, Capital Improvement Plan, Land Development Manual and Troutdale Parks Plan).

The city of Troutdale/Multnomah County Urban Planning Area Agreement (UPAA) became effective in February, 1979. The County's plan applies to all unincorporated lands within the Urban Planning Area. Inconsistencies between the Metro Urban Growth Boundary (UGB) and the Urban Planning Area of the UPAA are discussed under Goal #14 of this review. Although there is no distinction on the Land Use Map between "Immediate" and "Future Urbanizable" lands, the plan (p. VI) does include a definition of these terms relative to Troutdale. If the immediate/future urbanizable designations are to be applied to Troutdale, then the four conversion factors of Goal #14 would apply.

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

1. Amend the plan to state specifically the City's ultimate policy choices regarding the allocation of land for residential purposes. (See Goal #10 of this review.)
2. Clarify the City's intent to distinguish between immediate and future urbanizable lands and address the requirements of Goal #14 as appropriate.

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

Two aggregate resource sites have been identified in the "Inventory" document (p. 127) consistent with the Oregon Department of Geology and Mineral Industries Study. Both sites are currently being mined. Neither plan policy nor the Zoning Ordinance allow for the extraction of aggregate resources; therefore, the subject extraction operations are being allowed as a pre-existing nonconforming use.

The Urban Outdoors, CRAG, 1971 study, has been referenced in the Troutdale plan. The "Outdoors" plans which affect Troutdale are carried out largely through the City's "Floodway/Greenway" designations along stream corridors. The Sandy River, which borders the City on the east, is designated as an Oregon Scenic Waterway. The Floodway/Greenway" designation is applied to the Sandy River area.

The Floodway/Greenway overlay zone applies to Policy Areas #1, #2, #4 and #6. Within Policy Area #1, development in the Floodway/Greenway areas is permitted, subject to City review and availability of urban services (one assumes services are available, however, since all lands are designated immediate urban). Within policy Areas #2 and #6, "No development within these areas shall be permitted, except as deemed appropriate by the City." (Emphasis added.) There are no criteria or standards by which "appropriate" development would be defined. The Zoning Ordinance, Section 10.040, Flood Hazard District, does allow development in the floodplain which appears inconsistent with plan policy for areas #2 and #6. There are no ordinance provisions which address the "Greenway" designated areas (e.g. riparian vegetation protection). Arata Creek does enter Policy Area #4, yet the floodplain and greenway designations are not referenced in this section of the plan.

Citywide goals and policies relevant to stream corridor protection are as follows:

"To continually strive to maintain the high air, water and land quality presently existing, and to protect and preserve those significant environmental and ecological resources in the area.

"To provide open space and park areas in sufficient amounts and types to meet the recreational needs and desires of the residents of the City.

"Environmental quality shall be maintained by guiding future developments and land use activities in such a manner so as to protect the City's environmental resources. The City will not allow activities that would significantly deteriorate the existing high quality of the water, air or land resources." (pp. 1-3)

There are no implementing measures, beyond application of the Flood Hazard District standards, by which to carry out the above goals/policies.

Conclusion: The City does not comply with the regional requirements under Goal #5. In order to comply, the City must:

Adopt implementing measures which adequately protect/preserve all lands and streams designated "greenway" on the Troutdale Comprehensive Plan Map.

Goal #6 Air, Water and Land Resources Quality

The standard "sample language" on air quality has been included, which references the State Implementation Plan (SIP) and notes that the Portland/Vancouver Interstate Air Quality Maintenance Area (AQMA) is in nonattainment for meeting federal ambient air quality standards for ozone. Also included is a recognition of Metro's and the Department of Environmental Quality's (DEQ) role in addressing this problem. Troutdale commits to cooperating with Metro and DEQ in addressing the air quality problems. This "sample language," is contained within the "Findings" document, whereas ideally, it should be located within the comprehensive plan.

A Sandy River drainage basin report, developed by DEQ is referenced. Although the water quality elements (e.g., temperature, levels of dissolved oxygen, etc.) of the Sandy River have not been identified, a DEQ list of recommendations for plan development is included ("Findings" pp. 135-145). The standard "sample language" on water quality (i.e., recognize Metro's Waste Treatment Management Component) is included and minimally acceptable for Goal compliance. Again, however, the "sample language" is contained within the "Findings" document and ideally should be located within the policy document (i.e., "Comprehensive Plan").

The implementing measures are weak in terms of retaining riparian vegetation and channel integrity and ensuring adequate building setbacks. This issue has been discussed in more detail under Goal #5 of this review.

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

Goal #7 Areas Subject to Natural Hazards

The plan contains a good inventory of natural and manmade (i.e., airport traffic) hazards. The following citywide policy has been adopted relative to hazards.

"Hazards. Development in highly hazardous areas, such as land within a floodway or under the airport clear-zone, will be restricted or prohibited. Development may be allowed in areas of potential hazard if appropriate safeguards are taken in the design and construction to protect surrounding persons and property."
(p. 5)

This policy is implemented through Section 10.040, Flood Hazard of the Zoning Ordinance and Section 5.020 of the Subdivision Regulations where development on lands subject to hazards are subject to City Engineer review and Planning Commission approval. The City has adopted Chapter 70 of the Uniform Building Code (UBC) and, therefore, protection from hazards, for developments on lots of record (i.e., land not needing subdivision approval before development can take place) is provided.

Conclusion: The City complies with the regional requirements under Goal #7.

Goal #8 Recreational Needs

The "Troutdale Parks Plan" includes an inventory of existing facilities, a needs analysis for future park lands and design plans for existing parks. The park and recreation policies and plans are implemented through the City's Capital Improvement Program.

Consistency with the "Urban Outdoors" is discussed under Goal #5 of this review where it is noted that the implementing measures are inadequate for development on lands within the "Greenway" designated areas.

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

Goal #9 Economy of the State

Troutdale's economic analysis begins with an overview of the principal employers in the Troutdale area and character of job opportunities, followed by an examination of the relationship between the costs (to the City) of various land uses and the respective property tax revenues received. The City concludes that additional economic activity will be beneficial to the residential community. An industrial site survey conducted by the Oregon Department of Economic Development (DED) and the "Overall Economic Development Plan" (OEDP) developed by Multnomah County have been referenced as part of the City's economic background information. The actual number of acres allocated for commercial and industrial development has not been identified.

Policy Areas #2, #3, #4 and #5 on the plan map provide for commercial and industrial development. Policies are implemented primarily through the Zoning Ordinance.

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

Goal #10 Housing

Troutdale has not developed a housing needs analysis. However, the region has defined Troutdale's housing needs by 1) development of the Areawide Housing Opportunity Plan where households in need of assistance have been defined, and 2) through the various documents calling for a 50/50 single family/multi-family (SF/MF) new construction ratio and an overall density of about eight units per net acre (UNA). Therefore, the housing needs analysis requirement has been satisfied at a regional level. Until the City revises this needs assessment as may be deemed appropriate due to other Goal considerations, Metro's review and recommendations will be based upon the existing regionally defined housing needs for the City.

The City's principal residential districts are designated on the Land Use Map as Policy Areas #1 and #2. Policy Area #6, titled Agriculture, Conservation, Community Services, allows limited residential development on minimum lot sizes of 20,000 and 40,000 square feet per unit.

A buildable lands inventory has been developed, based upon the permitted uses in each policy area. The new unit potential as presented by the City, is indicated below:

New Housing Unit Potential

<u>Policy Area</u>	<u>Existing Units</u>	<u>Vacant Area (Gross)</u>	<u>Potential SF Units</u>	<u>Potential MF Units</u>
Area #1 (plotted) (committed) (undeveloped)		428AC	3,411 (386) (1,223) (1,802)	
Area #1 Transitional		168.6AC		2,186*
Area #2		11.8AC		85*
Area East of Sandy River**		26	26**	
Total less "Area East of Sandy River"**		608.4AC	3,411 (60%)	2,276 (40%)

Total housing units = 5,687

(Metro notes:)

* Troutdale has not subtracted any land for semi-public and public uses (e.g., 20 percent for roads) and, therefore, these figures are inflated.

** While the table on page 284 of the "Findings" document identifies 26 units as MF, page 288 states that due to a lack of sewers for this area now and in the future, this area will be built at one unit/acre and be single family. We have, therefore, classified this land (i.e., 26 acres) as constrained and eliminated it from the total housing potential figures.

As evidenced above, the city of Troutdale has failed to meet the regional expectation of a 50/50 SF/MF new construction mix. In fact, given the variety of uses permitted in each residential district, one questions whether even the planned 60/40 SF/MF mix can be obtained. To elaborate: within Policy Area #1 (the principal SF district) the R-10 and R-7 zones are allowed with the R-4 zone (duplexes) allowed at "appropriate" intersections. The City has assumed that 20 percent of the land will develop under R-10 and 80 percent under R-7 ("Findings" document, p. 285). There is no justification for these assumptions nor is such an allocation supported by policy or existing zoning.

The "Transitional" district within Policy Area #1 allows an R-4 zone which permits one and two family dwellings; retail and office use; an A-2 zone which permits all the above (i.e., uses permitted under the R-4 zone) plus apartment dwellings; and an A-1-B zone which permits apartments and/or business offices. Assumptions contained within the "Findings" document relative to Policy Area #1 are as follows:

- "a. Virtually no development will occur at R-4 densities.
- b. Twenty-five percent of the land will be developed under the A-2 zone.
- c. Seventy-five percent of the land will be developed under the A-1-B zone.
- d. Within the A-1-B zone, 75 percent of the land will be developed for residential uses and 25 percent for nonresidential uses."
(p.286)

These assumptions have not been based upon an identified set of findings nor are they supported by policy or existing zoning.

Within Policy Area #2 (the principal MF district) the C-2, C-3 and C-4 commercial zones and the R-4, A-2 and A-1-B residential zones are allowed by policy. The development assumptions for this area include:

- "a. Fifty percent of the land will be developed under the A-2 and A-1-B zones.

- b. Ninty percent of the land developed under the A-2 and A-1-B zones will be residential." (p. 287)

Again, these assumptions have not been justified by findings or policy nor supported by implementing provisions (i.e., zoning map).

In summary, the City has not determined its ultimate policy choices for land use in Policy Areas #1 and #2. The assumptions for land use allocations by zone are neither based upon identified findings nor supported by policy or existing zoning. Hence, given the wide range of uses allowed, there is no assurance that any multi-family dwellings will be developed.

Regionally, Troutdale is expected to reach an overall new construction residential density of about eight UNA. Without a clearer indication as to Troutdale's desired land use allocation, however, density cannot be determined.

Plan policy calls for allowing manufactured housing in the R-4 and multi-family zones (R-4, A-2 and A-1-B) yet "mobile home parks" are allowed only in the A-2 zone (re: 2.0, Section 7.051) at a maximum 10 units per acre subject to a Planning Commission hearing. According to the Zoning Ordinance, the Planning Commission may deny or establish conditions of approval for a mobile home development without need to follow specified standards (see below).

"The Planning Commission may approve, disapprove or modify any application and attach reasonable conditions to the development plan. No building permit shall be issued except for construction conforming to the Development Plan." (2.0. p. 45)

Plan policy also states: "Individual manufactured homes may be allowed in any residential zone as a conditional use subject to clear and objective standards" (p. 7). This policy has not been carried out in the City's ordinances. Further, the Troutdale conditional use standards are vague and discretionary as follows:

"Conditions and restrictions may include a specific limitation or uses, landscaping requirements, off-street parking, performance standards, performance bonds and other reasonable conditions, restrictions, or safeguards that would uphold the intent of the Comprehensive Plan and mitigate any adverse effect upon the adjoining properties which may result by reason of the conditional use being allowed." (Emphasis added) (2.0 Section 11.061.02)

"Other types of uses and uses outside of the transitional areas may be established upon a finding that the granting of the Conditional Use

Permit will not be detrimental to the health, safety and general welfare or injurious to other property and is in conformance with the goals and objectives of the Comprehensive Plan."
(Emphasis added) (2.0 Section 11.064.02)

To add further burden to the developer, an annual review is required of all conditional use applicants:

"A Conditional Use Permit granted in areas outside of the transitional areas shall be reviewed at a public hearing every year in order to establish the degree of compliance of the use with the conditions placed upon the permit."
(2.0, Section 11.061.04)

In light of the requirements (e.g., conditional use and design review) for the placement of mobile homes as compared to single family dwellings (e.g., subdivision approval), it is apparent that the following City housing policy has not been carried out:

"Manufactured home parks or subdivisions will not be required to go through any review process beyond that required for conventional stick-framed housing." (p. 7)

Development on constrained land (i.e., greenway/floodway designated lands) or the allowance of density transfers from constrained lands is left unclear as specified in Policy Area #2:

"No development within these areas shall be permitted, except as deemed appropriate by the City to expand or re-subdivide existing developments." (pp. 14 and 17)

The Subdivision Regulations, Section 2.040.02, does specify a time certain for a hearing date following preliminary plan submission (i.e., 60 days) but can be extended if requested by the Department of Community Development (i.e., City).

All land use developments, except SF, are subject to design review. The staff is authorized to review the design of duplexes whereas all other uses must be reviewed by the Design Review Board. The evaluation considerations include the following, where items #2 and #12 are vague and discretionary.

"Section 3. Design Review Considerations

Evaluation will include but not be limited to the following functional design considerations:

1. site characteristics, such as topography, soils, existing vegetation, natural drainage ways and natural hazards;

2. compatibility with and effect upon the surrounding buildings, neighborhoods, and environment;
3. solar and wind orientation, and the use of existing and proposed vegetation as they affect energy conservation;
4. parking areas and the overall circulation system;
5. pedestrian traffic and access;
6. storage areas for recreational vehicles;
7. service and delivery areas;
8. usable outdoor areas;
9. utilities, including the sewer, water, storm drainage, lighting and sprinkler systems;
10. police and fire protection;
11. landscaping and berming, especially with regard to screening to reduce noise, maintain or enhance private areas, block off objectionable views or noncompatible land uses, conserve energy, and prevent soil erosion;
12. building design, in terms of its relationship to surrounding buildings, and neighborhoods, its scale, its provisions for the handicapped, its energy efficiency and its general visual impact." Ordinance #246)

All condominium proposals or conversions are subject to review by the Planning Commission. The criteria for approval have not been established.

The City has chosen to upzone land over time on a case-by-case basis. The Zoning Ordinance, Section 12.00 does contain a zone amendment process, but fails to provide any criteria by which approval/denial will be judged. There is no policy which supports the upzoning approach taken by the City. Since nearly all MF developments will require a zone change, clear and objective zone change approval standards are essential.

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

1. Amend the plan to state specifically the City's ultimate policy choices regarding the allocation of land for residential purposes by type, density and location which meets the regional expectations of a 50/50 SF/MF new construction ratio and an overall density of about eight units per net acre (UNA).
2. More adequately provide for cost moderating opportunities under clear and objective approval standards.
3. Amend the plan and implementing ordinances to more clearly state the City's policies regarding development in the greenway/floodway districts.
4. Amend Ordinance #246 regarding the Design Review Board so as to establish clear and objective review standards.
5. Either upzone all land consistent with the City's ultimate policy choices for residential development or adopt policy supporting a case-by-case upzoning process and establish clear and objective standards for zone changes.

Goal #11 Public Facilities and Services

The City's water is received from two wells supplemented by water from Wood Village (needed in past summer months) and Gresham (as an emergency connection only). A \$2 million bond proposal has been recently passed to finance major water system improvements.

Troutdale's sewer plant is being expanded to a 1.6 MGD capacity. Further expansion will be needed, however, an alternative to expansion is development of a sub-regional facility combining the service areas of Troutdale, Gresham, Inverness and Columbia sewer districts. A consortium involving these entities has been formed and is pursuing "201" funds to begin a study which looks at the subregional options for sewerage treatment.

Storm drainage is adequately addressed in the "Storm Sewer Study," January, 1977.

The plan includes the required (sample) language calling for coordination with regional plans for sewerage treatment and solid waste (Findings pp. 203-204).

Public facility plans are implemented primarily through the Capital Improvement Program (CIP).

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

Goal #12 Transportation

All the pertinent inventories have been completed. The Multnomah County Transportation Plan is referenced which addresses State and

regional systems within the City. The County's Functional Classifications of Trafficways was adopted by the City. The Troutdale airport has been addressed through a series of reports prepared by CH2M HILL for the Port of Portland.

Plan policies generally support an improved circulation system with mass transit, bicycle and pedestrian options encouraged.

Policies are implemented through the Capital Improvement Program and application of the Subdivision Regulations.

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

Goal #13 Energy Conservation

The City has included a brief analysis of energy sources and potential energy conservation measures. The desire to conserve energy underlies several of the City's policies. Increased residential densities, land use patterns in relation to transit, evaluation by Design Review Board for energy efficiency and more are noted as ways Troutdale is addressing the need to conserve energy.

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 "Findings" document (p. 241) and on the Land Use Map. Through Metro's review of the Troutdale plan, a discrepancy in the delineation of the Metro UGB (within the southeast corner of Troutdale's urban planning area) has been identified. Troutdale has depicted a boundary consistent with the Metro adopted legal description, yet, inconsistent with Metro's adopted UGB map. Metro will be making the appropriate correction to this area of the UGB consistent with the UGB amendment procedures. Troutdale will be required to make adjustments to their Land Use Map (i.e., UGB), if any are required, following Metro Council action on this matter. This is a post-acknowledgment issue.

Although there is no distinction on the Land Use Map between "Immediate" and "Future Urbanizable" lands, the plan (p. VI) does include a definition of these terms relative to Troutdale. If the immediate/future urbanizable designations are to be applied to Troutdale, then the four conversion factors of Goal #14 would apply.

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

Clarify the City's intent to distinguish between immediate and future urbanizable lands and address the requirements of Goal #14 as appropriate.

Metropolitan Service District

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

Memorandum

Date: October 5, 1979
To: Ed Murphy, Director of Community Development
From: Michael V. Butts, Metro Plan Review
Subject: Final Plan Review for City of Troutdale

Following is a summary of recommended amendments for the Troutdale Comprehensive Plan as discussed at our September 24, 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 the "Text" must be handled as Plan amendments. These items are noted with a "T." Modification or additions to the background data can be handled through additions to the "Background Inventory." These items are indicated with an "I." Items essential for compliance are indicated with an "*." 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

0.1.9. "Amendment Procedures," page VI, are not adequate to meet this requirement. An additional paragraph containing the necessary "Opening Language" should be included. (See Plan Review Manual, Section III, E, for sample language.)

0.2. Plan consistency with "208" Population Projections shall be determined after Troutdale has submitted its population study.

Goal #1 Citizen Involvement

1.6. We recommend a final evaluation of your citizen involvement process. The evaluation should address each of the six goal requirements. Discussion in the Evaluation Worksheet (EW) on this item should be incorporated into the evaluation.

Goal #2 Land Use Planning

2.2.2. The Troutdale plan has been organized under three main headings which are "Background Inventory," "Text" (goals, objectives and policies) and "Appendix." Each chapter in the inventory concludes with a list of policy options. Those policies earmarked for adoption should be restated in the "Text." Likewise the appendix includes a number of policies which should be restated in the "Text" if they are to be adopted.

The inadequacies to goal requirements in your "Background Inventory" have in several instances been met by documentation in the "Appendix." An appendix index at the end of each inventory chapter identifying relevant material would help direct the reader.

The EW submitted with the City's comprehensive plan self-evaluation has, under most goal items, provided the necessary information to meet the goal requirements. The EW discussions should be added to the "Background Inventory" at the end of each applicable chapter. The following pages have noted where this is appropriate.

*2.1.2. This criterion will be satisfied if changes are made to reflect the recommendations of this review.

*2.1.2.2. As noted in the EW, several inconsistencies exist between the plan map and zoning map. All land use/zone inconsistencies are zoned for a less intensive use than the plan map. If the City intends to make these zone changes upon request of the landowner, then a policy to this effect should be developed. (T) The "Transitional Use Area," in terms of permitted uses is counter to the general purpose of Policy Area 6. This inconsistency needs to be resolved. I would suggest substituting the "Transitional Use Area" with a conditional use provision in Policy Area 6. The same uses could be permitted but subject to a set of standards which would preserve the natural scenic character of the river corridor (Refer to Goal #15 Willamette River Greenway). (T)

2.2.1. As noted in the EW, this requirement will be met after Metro's review is completed.

*2.2.2. A general policy on cooperating with federal and state agencies, Metro, Multnomah County and neighboring cities regarding solid waste, air quality, transportation and parks and recreation should be adopted.

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

The 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

Goal #3 Agricultural Lands

Not Applicable

Goal #4 Forest Lands

4.1.4. The inventory discussion established a class I, II, and III system for noting various forest types. Although this is an effective way to discuss this topic, it is in conflict with federal forest classification standards which refer to the cubic foot per acre and tree height for commercial forest. I suggest using a class A, B, and C or type A, B, and C. (I)

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

5.1.2. The two aggregate sites noted in the EW should be identified in the Goal #5 inventory. These sites may have potential for future parks development. (I)

5.1.7. It is difficult for the lay person to understand soil maps. A map identifying water areas, wetlands and watersheds would be a more useful park planning tool and thus should be provided. (I)

5.1.9. It is unclear from the section on Troutdale's history which historic structures are still remaining. As noted in the EW, the CETA historic study is nearing completion. We anticipate this study will clarify which sites and structures of historic value remain.

5.1.13. The "Urban Outdoors" identifies scenic drives along Burnside continuing a short distance along 80N and along the Columbia River. This should be recognized in the plan. (I)

5.2.1. Conflicting uses such as discussed under Item 2.1.2.2. Policy Area 6, should be identified. (I)

*5.2.3. The text contains no policies for the preservation of historic areas and, therefore, should be amended. (T)

*5.3.1. The EW discussion on open space and parks implementation measures should be included in the inventory. Policy Areas 2-6 contain a provision for historic preservation. This same provision should be included in Policy Area #1. The design review standards (not submitted but should be for compliance) should contain specific standards directed toward the preservation of historic areas. Areas designated as "historical" or "design review" have not been located on the plan map as stated. (T)

Land immediately adjacent to the Sandy River, identified as Policy Areas 2 and 3, is not adequately protected as it would be if designated as Policy Area 6. This area along the river corridor should be protected and thus warrants re-examination.

Goal #6 Air, Water and Land Resources Quality

*6.1.1. and 6.1.1.3. The data used to discuss air quality are out of date and ideally should be revised with current DEQ/Metro data. At a minimum, a statement should be developed recognizing that the base data are dated and that the air quality section will be revised, subsequent to plan compliance in cooperation with DEQ and Metro. (I)

6.1.1.1. An airshed definition should be included in the plan. (I)

6.1.1.2. The EW discussion on this item should be included in the inventory. (I)

6.1.2.1. "River Basin" should be defined in the plan. (I)

6.1.2.4. The results of the Troutdale "201" Facility Plan by DEQ should be summarized and included within the plan. (I)

*6.1.3. The discussion in the EW (6.1.3.1.) should be incorporated into the plan. Also, a brief statement identifying the solid waste problems of the region and a description of Metro's role should be included. In addition to the Obrist landfill

site, the DSA study has identified the Sandy Delta site alternative. If this latter site is within the City, it should be identified in the plan. (I)

*6.2.1.1. Airport noise problems have been addressed through various land use policies and standards established within the airport study. A number of alternatives have been identified on pages 144-146 which deal with noise. Those alternatives which are to be adopted as policies must be restated in the "Text." (See Goal #2 Review). (T)

6.2.2.1. The EW discussion of this item should be included in the inventory. (I)

6.2.2.3. and 6.2.2.5. The EW discussion is presently in policy form and could simply be included in the "Text" to meet this requirement. (T)

Goal #7 Areas Subject to Natural Hazards

7.1.4. The "Troutdale Storm Sewer Study" did not directly address erosion and deposition. Ideally this should be completed, but is not critical for compliance. (I)

*7.2.1. Reference should be made in the zoning ordinance Section 10.040 Flood Hazard, to the map being used to identify flood hazard areas (i.e. Army Corps Engineers Flood Plain Map). Ideally the flood hazard zone should be indicated on the zoning map. The location of the map (i.e. City Hall) should be indicated as well.

*7.1. Methane gas migration is a hazard in the Obrist landfill area. Since the City has indicated it may assume responsibility of the Obrist landfill site in 1980, policies should be developed which address landfill management and hazards. In addition, standards and requirements should be established for development on land surrounding the landfill site and prevention measures instituted to retard methane gas migration. (T)

Goal #8 Recreational Needs

8.1.2. See review of item 5.1.13.

8.2.2.1. The role of private enterprise should be identified. If private enterprise is not anticipated to take a significant role in the provision of recreational opportunities, then this should be noted. (I)

8.2.2.4. See Goal #2 Land Use Planning Review

*Note: We anticipate submission of a subsequent park plan.

Goal #9 Economy of the State

*9.1.6. The "Multnomah County Industrial Land Study" does identify land available for industrial development. Land available for commercial development should be identified during the vacant/buildable land survey presently underway in your City. The summary of findings on vacant land for commercial development should be included in the economic chapter of the plan. (I)

*9.2. The rationale behind the allocation of land for future commercial development has not been identified. A comparison with other cities regarding the percent of land designated for commercial development is one possible way to address this issue. The 9.1.3. EW discussion should be included in the plan. (I)

Goal #10 Housing

*A review of the housing and population study will be conducted following its submittal to Metro. Following are a few comments generated from a cursory review of your housing policies and implementation measures and from our meeting on September 24, 1979.

1. In addition to a buildable lands inventory, a projected housing mix by the year 2000 must be established. This should be based on the plan map and its allocation for residential development. Metro has identified a 65 percent single family and 35 percent multi-family as a reasonable mix to meet the region's fair-share of housing types. If this mix will not be reached (at least 35 percent multi-family to include duplexes) then a 50/50 percent new construction mix to the year 2000 would also meet this requirement.
2. The "Transitional Use Area" permits a variety of uses including multi-family, commercial and community service development. Since this area does not allow multi-family development exclusively, this land cannot be counted towards your future housing mix. If the policy is to be amended to permit only multi-family but as a conditional use, then the units can be counted toward the multi-family percentage, but the approval standards must be clear, objective and reasonable. Section 1.04.022, A and C of Policy Area #1 do not meet the clear, objective and reasonable criteria.

In addition, Item 10.2.5 requires that land be made available. Section 1.04.022, F allows transitional uses as a buffer only after the abutting commercial development is in place. This land cannot be classified as available since commercial development may never take place.

3. The city has instituted a system of service charges on all new construction. The justification for this assessment in terms of the fee and its relationship to the cost for new facilities, should be established.
4. A policy recognizing the responsibility to provide low income housing is required. This policy can be implemented through the County's Housing Opportunity Plan (HOP).
5. Mobile homes are allowed in an A-2 zone after a public hearing. Vacant land zoned A-2 is extremely limited and thus allows a limited number of mobile homes. The inventory speaks to the disadvantage of encouraging mobile homes as an alternative for low income housing. If the argument against mobile homes can be further substantiated by some base data, the limited land available for mobile homes may be justified. You should either provide this justification or make more land available for mobile home placement. The mobile home approval standards (7.055.03) should be revised as the language does not meet St. Helens case requirements.

Goal #11 Public Facilities

Generally, the sewer, water and storm drainage studies address the factual base inventory criteria. Your comments in the EW item 11.1.1.4. and 11.1.5 should be included in the inventory as they give clarity to the Multnomah County sewerage consortium and its role in serving the Troutdale area. (I)

11.1.4. The EW discussion on this item should be included in the inventory. (I)

*11.1.5 At a minimum, the solid waste problems of the region should be briefly summarized (refer to "Disposal Siting Alternatives", Metro). The EW discussion on the Obrist site should be included in the inventory. Lastly, a brief description of Metro's role in solid waste management should be added to complete the requirements of this criterion. (I)

11.1.6. The summary of police services in the EW should be added to the public facilities inventory. The long range plan for police service referenced in the summary, should be submitted with the plan package or results summarized. The plan or summaries should address each of the items 11.1.6.1-.4. (I)

11.1.6. Ideally your discussion on fire service should be expanded to address future service needs and identified problems and indicate if a system or plan has been developed to insure adequate fire protection. (I)

11.1.8. At a minimum, hospitals or clinics which serve the Troutdale area should be identified. Also, any rescue or ambulance service of the area should be noted and any major problems, if any, identified. (I)

11.1.9. It will suffice to include the EW summary on "Energy and Communication" within the inventory section of the plan to meet this criterion. (I)

11.1.10. Include the EW discussion Item 11.1.10.1 and 11.1.10.2 within the inventory to meet the requirements of this criterion. (I)

11.3.2. It would be helpful to include the EW summary on public facility financing in the inventory. (I)

Goal #12 Transportation

12.1.1.1. A brief summary of the "Transportation Technical Appendix East Multnomah County Roads Systems" findings regarding highways in the area should be entered into the inventory to include present use, capacity and identified problems. (I)

12.1.1.1.4. The Portland/Troutdale Airport Master Plan Study should be referenced under "Air Traffic" in the inventory. (I)

12.1.1.7. A brief reference to the bikeway system proposed in the parks plan and the CRAG and Multnomah County Bikeway plans would be helpful. (I)

*12.1. By including the EW discussion Items 12.2.1.2 and 12.2.1.3, your plan will have adequately addressed this criterion, except for the transportation disadvantage. (I)

*12.2.1.1.8. Existing service level and projected need of service for the transportation disadvantaged should be included

in your inventory. This information may be located by contacting Multnomah County and/or Tri-Met. (I)

12.2.2.1. The EW discussion on this topic should be included in the plan with the following amendment. Metro has identified inconsistencies between the ITP and the county Functional Classification of Trafficways. However, it is not evident at this time which document will be amended. (I)

12.2.3.1 - .5. It would be helpful to include the EW summary addressing this item in the inventory. (I)

*12.2.4. Truck traffic has been identified in the inventory as a serious problem in the Troutdale area. Policies which deal with this problem should be developed. (T)

An additional policy supporting the provision of special services for the transportation disadvantaged should be included. (T)

Goal #13 Energy Conservation

13.1.2.-.4. The energy use characteristics of Troutdale, as identified on pages 69 of the "CRAG Regional Energy Analysis, #2," should be included in the inventory. (I)

*13.2. Several methods for conserving energy have been sited in the inventory. As discussed under item 2.1.2, objectives slated for adoption as policy should be restated in the "Text." Strategies identified on page 311 in the appendix are excellent and should be considered for policy development. (T)

Goal #14 Urbanization

14.2.2.1. The Metro Urban Growth Boundary should be referenced in the plan. (I) The plan map should be revised to show the Metro UGB aligning with the south shore of the Columbia River and including the study area south of Troutdale. Since the city will be asking for a "City Limits" plan acknowledgment, the UGB and the Troutdale planning area inconsistencies do not have to be resolved at this time.

*14.2.2.2. A policy which recognizes and supports Metro's role in establishing and amending the regional UGB should be included. (T)

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*14.2.2.3.2. The city has defined immediate and future urbanizable lands (Text, page VI). A policy should be developed which allows for the conversion of lands from future to immediate urbanizable under specified conditions consistent with Goal #14 and Metro's Land Use Framework Element.

MB:bk
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cc: Jim Knight, DLCD Compliance Team Supervisor
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