

City of Troutdale PERIODIC REVIEW EVALUATION

The following four factors from state statute determine whether the city must prepare a work program to correct comprehensive plan or land use regulation shortcomings.

FACTOR 1: There has been a substantial change in circumstances including but not limited to the conditions, findings or assumptions upon which the comprehensive plan or land use regulations were based, so that the comprehensive plan or land use regulations do not comply with the statewide planning goals relating to economic development, needed housing, transportation, public facilities and services and urbanization.

City Response

The City's first comprehensive plan was adopted in 1971 but it has undergone numerous revisions and several rewrites since then. The current plan was adopted in September 1990 during the City's last periodic review. Since that time, the plan has been amended three times. None of these amendments were specifically enacted for the purpose of satisfying statewide planning goals. Thus, the findings, assumptions and conditions upon which the current comprehensive plan are based are at least eighteen years old and very likely do not comply with statewide planning goals and guidelines relating to economic development, needed housing, transportation, public facilities and services, and urbanization. The plan needs to be evaluated for compliance with these goals and updated accordingly.

Troutdale lies within the boundaries of the Portland Metropolitan District, or Metro. Within the district, circumstances have changed dramatically since adoption of the City's current comprehensive plan. For example, Metro has adopted the 2040 Growth Concept, the Regional Framework Plan and the Urban Growth Management Functional Plan. These all have a bearing on the city's zoning and land use regulations. The city has amended its zoning and development code a number of times to comply with requirements of Metro's Functional Plan, but the comprehensive plan has not been amended in each of these instances to be consistent with code revisions. The plan should be evaluated to bring conformity between it and those code provisions already adopted to meet Metro requirements.

Specific to economic development, a substantial change that has occurred since the last plan update is the closure and demolition of the Reynolds Aluminum smelter plant that was the single, largest employer within the Troutdale area for decades. The Port of Portland has purchased the 700 acres once owned by Reynolds, has annexed the property into the City, and is now installing public utilities to be able to subdivide, market, and sell industrial lots to prospective businesses. Redevelopment of the Reynolds aluminum site along with adjacent industrially zoned lands could add greatly to the City's employment base and would provide a major stimulus to the local economy. An economic development plan was prepared in 2007 for the industrial zoned lands lying between Interstate 84 and the Columbia River within the four East Multnomah County cities. This area that has been labeled as the Columbia-Cascade River District, encompasses the former Reynolds property and other

industrial zoned properties within the four cities. This economic development plan has not been formally adopted by the City of Troutdale and it should be referenced or incorporated into the city's comprehensive plan.

Current industrial zoning of the large tract of land that Multnomah County owns on the south side of Halsey Street at the western city limits does not fit the City's vision for how this property should be developed. This property should be evaluated for rezoning to a classification that better achieves its desired use provided there are sufficient buildable lands elsewhere within the City that are zoned for and suitable for industrial uses.

Specific to housing needs, much has changed in the housing market since the City's comprehensive plan was originally prepared. The spiraling cost of housing since then has caused a shift for many homeowners from traditional large-lot, single-family detached units to relatively more affordable attached housing units on smaller lots. Where detached dwellings are now being built to meet demand, they are more commonly on smaller lots. An analysis of the city's housing stock and an update of the Comprehensive Plan's Housing element are needed to determine the following:

- Are the costs of new housing units affordable based on projected household incomes for City residents? If not, what measures is the city willing to take to increase the supply of affordable housing?
- Does the city provide the types, locations and densities of housing needed by all of its residents?
- Are the city's comprehensive plan and zoning code compliant with the Metropolitan Housing Rule, particularly the requirements for minimum residential density for new construction?
- Does Troutdale have a 20-year supply of vacant or redevelopable land or land with infill potential to accommodate the number of additional residential units allocated by Metro's next housing capacity target?

A review and update of the comprehensive plan will better determine whether land use regulations are also warranted.

Specific to transportation, the City's Transportation System Plan (TSP) contains goals and policies to guide capital projects for improving the city's overall transportation network. The TSP was last updated in 2005 and was determined to comply with statewide planning goal 12 at that time; however, changes to the administrative rules governing transportation (Transportation Planning Rule) since the last TSP update was undertaken may necessitate revisions to the TSP. A comprehensive plan update is necessary to acknowledge and reference the goals and polices contained in the TSP.

Specific to public facilities and services, there have been significant changes in the city's utility systems since the current comprehensive plan to warrant an update. On the

wastewater side, the city has constructed a new wastewater treatment plant to replace its aging facility that was located within the downtown area. Several additional source wells have been added to the water system. Although the City has a variety of separate plans and studies pertaining to its public utility systems, these individual plans need to be evaluated against requirements for public facility planning according to Goal 11 and its implementing administrative rule.

Historic preservation is covered under Goal 5. The city's current inventory of historic structures and sites needs to be updated and tools for historic preservation need to be evaluated so that the city can do a better job of protecting its historic resources.

Other goals and policies within the city's comprehensive plan that correspond to statewide planning goals are based on outdated information that is in need of an update. Since the entire document is founded on conditions, findings and assumptions that date back to the 1980's, it is important to evaluate each of these planning goals to see if they reflect present community values and public sentiments about the city's growth and development for the next 20-year planning horizon. It is important to point out that in 1990 when the current comprehensive plan was adopted, Troutdale's population was 7,852. Today, the official population estimate for the city is 15,430 -- virtually double what it was at that time.

FACTOR 2: Decisions based on acknowledged comprehensive plan and land use regulations are inconsistent with the goals relating to economic development, needed housing, transportation, public facilities and services and urbanization.

City Response

Current land use decisions are being made according to the city's acknowledged comprehensive plan and implementing development code. Over time as statewide planning goals and their administrative rules have been revised, the Troutdale Development Code has been amended to stay current with some of the changing goals and rules, such as the Transportation Planning Rule. However, not all of the revised administrative rules have been evaluated nor efforts taken to amend the comprehensive plan or zoning regulations for compliance. Similarly, where regulations have been amended, the policies of the comprehensive plan have not been evaluated for consistency with these amended regulations, so the policies may not support the regulations.

Although the current comprehensive land use plan and regulations were designed for consistency with statewide planning goals in effect eighteen years ago, and were acknowledged as such at that time, without a thorough evaluation of the plan and regulations against current statewide planning goals, it is unknown whether they are fully compliant today. The plan should be evaluated and updated, as necessary, in accordance with the following planning goals and administrative rules:

Statewide Planning Goals and Guidelines #1 through #14

- OAR 660-015-0000

LCDC Administrative Rules

- OAR Chapter 660 Division 7, Metropolitan Housing
- OAR Chapter 660 Division 8, Interpretation of Goal 10 Housing
- OAR Chapter 660 Division 9, Economic Development
- OAR Chapter 660 Division 11, Public Facilities Planning
- OAR Chapter 660 Division 12, Transportation Planning
- OAR Chapter 660 Division 13, Airport Planning

FACTOR 3: There are issues of regional or statewide significance, intergovernmental coordination or state agency plans or programs affecting land use which must be addressed in order to bring comprehensive plans and land use regulations into compliance with the goals relating to economic development, needed housing, transportation, public facilities and services and urbanization.

City Response

Since the current comprehensive plan was adopted and acknowledged, the State has implemented an aggressive economic development program to attract new industry and businesses to Oregon. Among the steps the State has taken to promote job growth throughout Oregon is the creation of Economic Revitalization Teams, a state program to certify “shovel ready” industrial sites, and legislation authorizing local enterprise zones to grant property tax breaks to eligible developments. In 2006 the City of Troutdale approved an urban renewal district for a portion of its town center area. In 2008 the City established an Enterprise Zone for its north industrial area to offer tax incentives to new and existing businesses that qualify. All of these tools ought to be evaluated and addressed in the comprehensive plan through a plan update process.

On the housing side, there are many more housing assistance programs available to the city now than at the time the current comprehensive plan was adopted. At both the state and regional level, funding assistance programs are available to assist with construction of housing types that are affordable to a broader range of income levels. Some of these funding programs are only available for mixed-use developments that include both commercial and residential components. The city needs to examine its current housing supply to determine whether a variety of housing types are being provided to its residents at prices they can afford. The city also needs to assess what role it desires to have in making sure that adequate affordable housing is built here.

In terms of urbanization, Metro and the three Metro area counties are working collaboratively to designate urban and rural reserves outside the current Portland Metropolitan Area urban growth boundary (UGB). These designations will determine what land will be eligible to be brought into the UGB over time as additional lands are needed to meet the projected twenty year growth demand. Lands to the south and southeast of Troutdale’s city limits will be evaluated under the urban/rural reserves designation process. The city needs to be involved in this process in order to express its vision and desires for future expansion into these areas. If lands outside the current UGB but adjacent to the city’s urban planning area are designated as urban, the city will need to assess the feasibility of serving this area with city utilities. A comprehensive plan update should address how the lands beyond the current UGB are designated and what this means for the city’s future growth.

The Troutdale airport, operated by the Port of Portland, is an important transportation facility that presents a special need for intergovernmental coordination. Because of the important role airports play and the need to protect them from incompatible land uses, there are specific planning rules that pertain to airports. These rules were adopted since the city's current comprehensive plan and it is unknown whether the city's plan and zoning regulations comply with them.

An issue of both regional and statewide significance that is not addressed in the city's current comprehensive plan is climate change and steps the city can take to help reduce carbon emissions into the atmosphere. Sustainability, or green practices, is not explored in the present plan within the modern context of carbon emissions and their impact on global climate change. Given the importance of these concepts at the national and international level, they need to be examined and discussed to some degree within the city's comprehensive plan. Beyond the five goals required to be addressed through periodic review, the city's comprehensive land use plan should to be updated to address the important topic of climate change and incorporating sustainability at the local level.

FACTOR 4: The existing comprehensive plan and land use regulations are not achieving the statewide planning goals relating to economic development, needed housing, transportation, public facilities and services and urbanization.

City Response

As explained under the prior factors, the city's comprehensive plan is outdated and does not adequately address statewide planning goals pertaining to the five above mentioned topics. Beyond these five particular planning goals, there are other issues that need to be addressed within the scope of period review. Among these are the following:

- Strengthening current historical preservation standards and exploring protection of scenic areas, vistas, and viewpoints.
- Integrating current Goal 6 and 7 standards for water quality and flood management into the comprehensive plan.
- Integrating key aspects of the adopted Transportation System Plan and the Parks Master Plan into the comprehensive plan.
- Determining what type of center Troutdale wants to have and exploring zoning and land use regulation changes that will achieve what is desired.