Public Notice

The City of The Dalles received notice from the Department of Land Conservation and Development that it is officially in "Periodic Review" of its Comprehensive Land Use Plan (CLUP). The State is requiring the City to evaluate the existing CLUP to see if it needs to be updated and, if so, to then develop a list of tasks to bring it into conformance with State's planning rules. The Planning Commission will be conducting a public hearing to evaluate the CLUP and consider any potential work tasks. Public and agency comment is invited either in writing before the Planning Commission hearing and for a 21 day period after the hearing, or orally at the hearing. The hearing will be on April 3, 2008, at 6:30 pm, in the Council Chambers at City Hall, 313 Court Street, The Dalles, Oregon. Interested persons or agencies may pick up a copy of the staff report with the draft periodic review evaluation and work program at the Community Development Department in City Hall, or view it on-line at the City's Web site www.ci.the-dalles.or.us, or call 541-296-5481 ext 1125 for a copy.

Draft
The Dalles Periodic Review Work Program & Grant Proposal Summary

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Introduction

The Dalles Comprehensive Land Use Plan (CLUP) and urban growth boundary (UGB) were acknowledged by the Land Conservation and Development Commission (LCDC) in 1982. Although The Dalles has been actively engaged in planning and economic development efforts over the last 26 years, its UGB has not changed since its establishment. Although population growth slowed in the 1980s, it has since picked up due to recent economic activity and recognition of the quality of life offered by Columbia River Gorge communities.

While the UGB has remained static, The Dalles has actively planned for the future. Major planning accomplishments include:

- Adoption and implementation of a downtown urban renewal plan;
- Adoption of a major update of the CLUP and implementing zoning regulations in 1993;
- Adoption of The Dalles Transportation System Plan (TSP);
- Planning for and construction of an 12-mile riverside trail system (almost complete);
- Construction of a fiber optics communication system;
- Development and implementation of sanitary sewer, water and storm drainage master plans;
- Adoption and application of a new community center mixed use zoning district;
- Passage of a $4 million property acquisition bond by the Port or The Dalles;
- Attraction and siting of the Google facility;
- Approval of the Lone Pine mixed use PUD (2006); and
- Completion of Phase 1 of the City's two-phased program to update the comprehensive plan – as approved by the Department of Land Conservation & Development (DLCD).

Phases I and II of The Dalles Comprehensive Plan Update

In 2005, the City of The Dalles (the City) worked closely with DLCD to develop a two-stage, four year work program to update to The Dalles CLUP, UGB and land use regulations. Phase I (land needs assessment and policy review) was completed during the summer of 2007 and was funded through a technical assistance grant. Phase I results are discussed in the following section.

The Dalles received Periodic Review notice on November 13, 2007. **Phase II of the four-year work program (implementation and adoption) is currently unfunded but is eligible for funding under a Periodic Review grant.**[1]

Phase I of The Dalles two-phase work program was extremely successful. As a result, the City has prepared and held public hearings on the following studies and plan amendments:

- A coordinated **population projection** with Wasco County - adopted by The Dalles and Wasco County. The Dalles population is expected to increase from 15,472 in 2006 to 22,545 by 2026, at an average annual growth rate of 1.9%.

[1] The City is in the process of conducting a periodic review evaluation and work program. Much of the information in this preliminary grant request will be used in the evaluation and work program, which must be reviewed in accordance with the City's citizen involvement program and approved by the City Council following a public hearing.

- An **Economic Opportunities Analysis** (EOA) – which is basis for determining industrial, commercial and other employment land needs and site requirements. The Dalles found that all of its industrial needs can be met through redevelopment of abandoned Northwest Aluminum site. However, the existing UGB is inadequate to accommodate the needs of a new regional center, a neighborhood center and a business park. Expansion of the UGB by about 100 acres is necessary to provide land for retail and business park employment opportunities.
- A **Residential Land Needs Analysis** (RLNA) – which is the basis for determining residential and public / semi-public land needs. The Dalles adopted a number of efficiency measures to increase residential densities and provide a greater variety of housing types in 1993. Actual densities since then have averaged about 6.25 dwelling units per net acre. After including additional measures to increase density in the Comprehensive Plan, net residential densities will increase by an additional 12% to 7.0 units per net acre. After accounting for school, park and other institutional needs, The Dalles must expand its UGB by 541 buildable acres to meet anticipated residential and public / semi-public land needs.
- An **Energy Conservation Program**. The Dalles CLUP includes a new section designed to increase energy efficiency. Conservation measures include nodal mixed use development, investment in transit facilities, solar access provisions, and reduction in vehicle miles traveled through urban design.
- A **Buildable Lands Inventory** (BLI) for the UGB and four alternative UGB expansion study areas. The Dalles conducted a detailed BLI that considered redevelopment potential (especially in industrial areas), residential infill, and more intensive development of vacant sites within the UGB. The Comprehensive Plan now includes policies to protect stream corridors and to restrict development on slopes of 20% or greater to minimize impacts on scenic views and to address potential slide hazards. Automatic density transfer provisions ensure that urban densities on buildable land will increase. After accounting for development of buildable land within the UGB, The Dalles still needs to expand its UGB by approximately 641 gross buildable acres to accommodate Year 2026 growth needs.
- A **UGB Alternatives Analysis** consistent with Goal 14, ORS 197.298 priorities, and the Urban Growth Boundary administrative rule (OAR Chapter 16, Division 24). The Dalles applied the buildable lands methodology used inside the UGB to four study areas on the Oregon side of the river to determine the capacity of each study area. The City considered ORS 197.298 priorities by avoiding expansion into high value orchard and wheat areas, carefully analyzed public facilities costs, and minimized adverse social consequences (scenic impacts) by proposing expansion into adjacent exception areas and Hidden Valley – and area with relatively poor agricultural soils that is not highly visible from key viewing areas in the Columbia River Gorge.
- An **Urban Reserve Area** land needs projection and alternatives analysis, consistent with OAR Chapter 660, Division 021. The City projected land needs through the Year 2056 based on a coordinated population projection adopted by both the City and Wasco County. After including nearby exception areas and the relatively poor, non-irrigated soils in Hidden Valley, longer-term growth was directed away from irrigated cherry orchards to higher-elevation, non-irrigated wheat lands *outside* the Columbia River Gorge National Scenic Area boundary. The City Council

adopted the Urban Reserve Area in 2007, and is ready for review and adoption by the Wasco County Court.

- *Draft* findings to support a **"Minor Amendment" to the Columbia River Gorge Management Plan** to "exempt" area within the proposed UGB from the provisions of the act. The analysis showed how the UGB / urban exempt area proposal minimized potential scenic impacts and avoided "special management areas." By expanding the UGB into adjacent exception areas and Hidden Valley – an area hidden from most "key viewing areas" by hills and ridgelines – the City believed that it had made a good faith effort to minimize potential scenic impacts, preserve highly scenic orchard lands, as required by the Columbia River Gorge National Scenic Area Act (NSAA).
- A **reorganized and extensively revised CLUP**. The Dalles CLUP has been reorganized into a three volume set: Volume I – Plan Policies; Volume II – Background Studies; Volume III – Public Facilities Master Plans; and Volume IV- Implementation. New policies have been drafted to ensure consistency with Statewide Planning Goals 5, 7, 8, 9, 10, 11, 12, 13 and 14. Policies addressing scenic, archeological, historical, and ecological impacts are also included in the draft plan, to address issues raised by Gorge Commission staff.
- A proposed **Comprehensive Plan Map** showing generalized plan urban and future urban plan designations for the entire URA and UGB area.

The City has conducted a series of work sessions and public hearings before the Planning Commission and City Council for the proposed comprehensive plan amendments, the 20-year UGB and urban exempt area proposal; and the 50-year URA. The UGB and URA proposal is supported by detailed findings demonstrating compliance with applicable Oregon Statewide Planning Goals. The DLCD reviewed the proposed UGB and accompanying plan amendments favorably.

However, the City Council has delayed adoption of the CLUP and UGB amendment package pending review by the Columbia River Gorge Commission (Gorge Commission). Under federal law, the area proposed for UGB expansion must first receive an "urban area" exemption under the Columbia River Gorge National Scenic Area Act (NSAA). The City has prepared preliminary findings for a "minor amendment" to the Columbia River Gorge Management Plan to "exempt" the proposed UGB expansion area from further review under the NSAA. However, Gorge Commission staff has advised the City that *substantial original* research and evaluation is necessary to support such an exemption. (See NSAA discussion below.)

Based on the EOA and HNA, Goals 9 (Economy of the State) and 10 (Housing) *cannot* be met unless and until the UGB has been amended to include a 20-year land supply. Compliance with Goal 14 (Urbanization) is a necessary but not sufficient condition for amending The Dalles UGB. Compliance with the NSAA is also required for such an amendment. Moreover, detailed master planning for Goals 11 (Public Facilities) and 12 (Transportation) cannot proceed with any certainty until there is an approved UGB. Therefore, **the City cannot meet its obligation to provide sufficient buildable employment and residential land without approval of an "urban area exemption" by the Gorge Commission.**

Compliance with the Columbia River Gorge National Scenic Area Act (NSAA)

The Dalles is the first City to propose UGB / urban exempt area amendments that are intended to ensure a 20-year land supply as required by Goal 14, Urbanization. Although the City made a good faith effort to address NSAA requirements, Gorge Commission staff felt that the City had not done enough to justify an urban area exemption from the NSAA. The Gorge Commission also held a work session on the matter and agreed with staff that additional comparative analysis of potential archeological impacts, scenic impacts, and ecological impacts is required. Moreover, the City has been advised that the capacity of Dallesport – across the river in Washington State – must also be considered before granting urban exempt area status.

Proposed 2008-09 Work Periodic Review Work Program and Budget

This grant proposal addresses two primary issues:

1. **Studies and mapping necessary to address compliance with the Columbia River Gorge Management Plan to achieve "urban exempt" status.**
2. **Implementation measures that must be adopted to ensure compliance with Goals 9, 10, 11, 12 and 14, and to address cultural resources that may be included within the "urban exempt" area.**

Task 1: Complete Studies Necessary to Address the Columbia River Gorge Management Plan

As noted above, The Dalles cannot meet its obligations under Statewide Planning Goals 8 (Recreational Needs), 9 (Economy of the State), 10 (Housing), 11 (Public Facilities and Services), 12 (Transportation) or 14 (Urbanization) *unless* The Dalles UGB is expanded to include sufficient buildable and serviceable land to meet recreational, employment, housing, school and park needs. In order to expand the UGB, the Columbia River Gorge Commission must amend the Columbia River Gorge Management Plan to "exempt" the expanded urban growth boundary from the provisions of the National Scenic Area Act (NSAA).

The Dalles analyzed four potential UGB / URA expansion areas as part of the UGB / URA alternatives analysis. Working with Winterbrook Planning, the City prepared a series of overlay maps and studies addressing all issues relevant to a UGB expansion or the establishment of a URA. However, these overlay maps and studies did not adequately address NSAA and Gorge Management Plan requirements and issues. Tasks 1.A – 1.C will result in a series of *original* studies and maps that allow a comparative analysis of the four study areas to determine the relative impacts of the proposed UGB expansion on scenic resources, cultural (archeological and historic) resources, and natural resources / open spaces (wetlands; streams, ponds, lakes, and riparian areas; wildlife habitat; rare plants; and "natural areas"). Although the alternatives analysis prepared by Winterbrook Planning considered known Goal 5 resource sites (streams and NWI wetlands) and resources identified in Wasco County's inventory (big game habitat), Winterbrook did not conduct new inventories for scenic resources, cultural resources or natural resources / open space *as defined in the NSAA*.

Task 1.A Scenic Resources Evaluation

The scenic resources evaluation will describe and map the relative visibility of land in the expansion with respect to Key Viewing Areas (KVAs). Visible areas will be ranked according to their scenic significance (prominent, moderate or low). Factors to be considered in this evaluation include topography, vegetative cover, visual diversity, and distance from the KVA.

Scenic maps and tables will be prepared to allow scenic values to be weighed against cultural and natural resource values when deciding where to meet growth needs identified in The Dalles UGB Justification Report. Where scenic areas are proposed for inclusion within the UGB, methods to protect scenic values on a limited basis will be identified. (For example, measures to protect a prominent rock outcrop or ridgeline with high scenic value.)

Estimated Cost: $25,000

Task 1.B Cultural Resources Evaluation

Under the Act, cultural resources are divided into, but not limited to archeological sites; historic buildings and structures; and traditional properties. These resources are defined in the NSAA as follows:

- **"Archaeological resources"** Physical evidence or ruins of human occupation or activity that are located on or below the surface of the ground and are at least 50 years old. Archaeological resources include, but are not limited to, the remains of houses, villages, camp and fishing sites, and cave shelters; rock art such as petro glyphs and pictographs; artifacts such as arrowheads, utensils, tools, fragments of tools and utensils, obsidian flakes or other material byproducts from tool and utensil-making activities; and graves, human remains, and associated artifacts.
- **"Cultural Resource"** Evidence of human occupation or activity that is important in the history, architecture, archaeology or culture of a community or region. Cultural resources include, but are not limited to archeological, historic buildings and structures and traditional properties.
- **"Historic buildings and structures"** Standing or above-ground buildings and structures that are at least 50 years old. Historic buildings and structures include, but are not limited to, log cabins, barns, canals, flumes, pipelines, highways, and tunnels.
- **"Traditional cultural properties"** Locations, buildings, structures, and objects that are associated with cultural beliefs, customs, or practices of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community. Traditional cultural properties include, but are not limited to, a location associated with the traditional beliefs of a Native American group about its origins or its cultural history; a location where a community has traditionally carried out artistic or other cultural practices important in maintaining its historical identity; and a location where Native American religious practitioners have historically gone, and go today, to perform ceremonial activities. Objects may include petroglyphs, pictographs, rock cairns or other rock structures, trees, and rock outcrops.
- The **old Columbia River Highway** is also classified as a scenic travel corridor under recreational resources, as it is a designated National Landmark. Impacts on the highway must also be evaluated.

City staff met with Warm Springs representatives to determine how best to undertake a planning level analysis of archeological, cultural, and traditional cultural sites. Sally Bird, Warm Springs' consultant archeologist, divided her proposed work program into two phases: Phase 1, Literature Review and Oral Surveys, will cost approximately $25,000. Phase 2, sample surveys and mapping, will cost an additional $25,000 to $50,000.

The cost of the historic resources inventory will be considerably less, because information on historic resources is available through existing sources. Nevertheless, since most of the homes located in the four study areas are older than 50 years, additional field work will be necessary to document the relative historic value of these older homes. Historic inventory and mapping is estimated at approximately $12,500.

Total Estimated Cost: $62,500 – 87,500.

Task 1.C Natural Resources and Open Space Evaluation

While there is some overlap between NSAA definitions and those applicable to Goal 5, there are also differences. Goal 5 and Goal 14 require cities to address resource sites identified in adopted County inventories, as well as riparian corridors and wetlands. The NSAA includes the following definitions, some of which overlap with cultural and scenic resource definitions:

- **"Natural resources"** Naturally occurring features including land, water, air, plants, animals (including fish), plant and animal habitat, and scenery.
- **"Open Space"** Unimproved lands not designated as agricultural lands or forest lands under the section 544 of the Act and designated as open space under section 544d of the Act. Open spaces include –
    - Scenic, cultural, and historic areas;
    - Fish and wildlife habitat;
    - Lands which support plant species that are endemic to the scenic area or which are listed as rare, threatened or endangered species pursuant to State or Federal Endangered Species Acts;
    - Ecologically and scientifically significant natural areas;
    - Outstanding scenic views and sites;
    - Water areas and wetlands;
    - Archaeological sites, Indian burial grounds and village sites, historic trails and roads and other areas which are culturally or historically significant;
    - Potential and existing recreation resources; and
    - Federal and State wild, scenic, and recreation waterways
- **"Riparian area"** The area immediately adjacent to streams, ponds, lakes, and wetlands that directly contributes to the water quality and habitat components of the water body. This may include areas that have high water tables and soils and vegetation that exhibit characteristics of wetness, as well as upland areas immediately adjacent to the water body that directly contribute shade, nutrients, cover, or debris, or that directly enhance water quality within the water body.

- **"Sensitive plant species"** Plant species that are (1) endemic to the Columbia River Gorge and vicinity, (2) listed as endangered or threatened pursuant to federal or state endangered species acts, or (3) listed as endangered, threatened or sensitive by the Oregon or Washington Natural Heritage Program. In the SMA, sensitive plant species also include plant species recognized by the Regional Forester as needing special management to prevent them from being placed on federal or state endangered species lists.
- **"Sensitive wildlife species"** Animal species that are (1) listed as endangered or threatened pursuant to federal or state endangered species acts, (2) listed as endangered, threatened, sensitive, or candidate by the Washington Wildlife Commission, (3) listed as sensitive by the Oregon Fish and Wildlife Commission, or (4) considered to be of special interest to the public, limited to great blue heron, osprey, mountain goat, golden eagle, and prairie falcon. In the SMA, sensitive wildlife species also include animal species recognized by the Regional Forester as needing special management to prevent them from being placed on federal or state endangered species lists.
- **"Wetlands"** Areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. This does not include riparian areas, rivers, streams, and lakes.

To determine the relative impacts on natural resources, a natural resources report and inventory maps will be required for each of the identified resource areas within the four study areas. The study will begin by accessing existing sources of information (Oregon Natural Heritage Information Center (ORNHIC) at OSU, Wasco County inventories, and the Oregon Department of Fish and Wildlife, and Gorge Commission staff resources), and will be supplemented by field inventories in areas where potential impacts are likely.

Estimated Cost: $30,000

Combined Task 1 Costs: $117,500 – $142,500

Task 2: Public Coordination and Hearing Processes

Conducting the inventories, preparing the maps, and doing a comparative analysis is the starting point. These studies must be coordinated with affected parties (e.g., the tribes, Gorge Commission staff, County staff, and affected interest groups) and must be refined through the public hearing process at the County and Gorge Commission level. If changes are made (and this is likely), additional public hearings will be required before The Dalles City Council. All of this will take a great deal of staff time and will require the presence of consultants who prepared the base studies and analysis.

Task 2.A Wasco County Coordination & Public Hearing Process

Wasco County has prepared a detailed public involvement that requires a series of work sessions, planning commission public and hearings and hearings before the County Court. The Friends of the Gorge are on record as opposing a UGB expansion large enough to meet The Dalles' 20-year growth needs.

Estimated Consultant Costs: $10,000

Task 2.B Gorge Commission Coordination & Public Hearing Process

As noted above, The Dalles request for a "minor amendment" to the Gorge Management Plan is unprecedented. It is probable that more than one public hearing will be required, that new issues will be raised, and that the burden of proof on the City will be high. Regardless of how well the initial studies address applicable review criteria; there will be a need to supplement the record with additional expert testimony. The estimate below is conservative.

Estimated Consultant Costs: $15,000

Tasks 2.C The Dalles Public Hearing Process

Changes to the recommended UGB and Comprehensive Land Use Plan (CLUP) will no doubt be required as a result of the public hearing processes described in Tasks 2.B and 2.C. Some consultant time will be required to explain to The Dalles City Council why the plan they spent a year reviewing must be amended to meet the expectations of County and Federal officials. There may also be implications for compliance with Statewide Planning Goals. For example, it is possible that archeological sites could be located on relatively poor agricultural soils, which could affect compliance with ORS 197.298 priorities.

Estimated Consultant Costs: $5,000

Combined Task 2 Costs: $30,000

Task 3: Implementation Measures

The original Phase II work program assumed (erroneously) that NSAA issues would be resolved in Phase I. The original Phase II work program focused on amendments to public facilities plans, city land use regulations, and intergovernmental agreements necessary to implement the new policies in The Dalles Comprehensive Plan – and to meet applicable Statewide Planning Goals.

Task 3.A Housing

Amendments to the City's residential zoning districts are required to implement new plan policies that call for automatic density transfer, minimum densities, and density averaging.

Estimated Cost: $5,000

Task 3.B Economic Development

Amendments to the City's employment zones are necessary to implement plan policies that call for master planning, retention of large sites, and the creation of a business park zone.

Estimated Cost: $5,000

Task 3.C Natural Features

Amendments are necessary to the City's zoning ordinance to implement plan policies that call for safe riparian corridor and wetland safe harbors, and for protection of hillsides in now in the scenic area with slopes of 20% or greater.

Estimated Cost: $5,000

Task 3.D Cultural

Amendments to the City's zoning ordinance are necessary to ensure that cultural / archeological resources identified in the cultural / archeological survey are protected as development occurs. These amendments must be coordinated with affected tribes.

Estimated Cost: $5,000

Task 3.E Master Planning for the Northwest Aluminum Site

The 250-acre Northwest Aluminum site recently came on the market. The City is interested in working with the property owner and Port of The Dalles to ensure that this land is reserved for uses identified in the EOA and used efficiently. This is the last large industrial site remaining in The Dalles. None are planned, or would likely be permitted, with in the Columbia Gorge NSA.

Estimated Cost: $20,000

Combined Task 3 Costs: $40,000

Estimated Timeline and Budget

The City's intent is that Tasks 1-3 be completed by June 30, 2010 – 30 months from today. The City would focus first on Tasks 1 and 2, both of which are necessary to allow the City to meet its obligations under Statewide Planning Goals 10-14. Task 3 would follow closely thereafter. **The overall budget for Tasks 1-3 is $187,500-212,500. These funds are necessary to meet the City's obligations under Goals 9-14, and/or to address County and Gorge Commission coordination requirements.**

Other Potential Funding Sources

The City has requested funding from the Columbia Gorge Commission, but was informed that no sources are available. The City is willing to work jointly with the Tribes to pursue funding for the State Historic Preservation Office for historic and cultural resources, although this is far from certain.

The City originally had intended to apply for Periodic Review funding to assist in preparation with key public facilities plans. Plans for wastewater, storm drainage, water, and transportation services must be updated for the expanded urban planning area. Under the circumstances, the City will focus first on addressing NSAA requirements, so that the land area to be served can be determined. The City intends to apply for a TGM grant to update the TSP as soon as the location of the UGB is determined. Although the City had been led believe that it would receive a grant from the Transportation and Growth Management (TGM) program to update the TSP this year, TGM grant funding did not materialize.

City Match

The City allocated additional funding ($30,000) in FY 2007-08 to address Gorge Commission and related issues. The City anticipates allocating a comparable amount in FY 2008-09 in order to do the planning necessary to meet local goals and its obligation under Statewide Planning Goals 10-14. In addition, City planning and engineering staff has devoted at least 0.5 FTE to this project, each year, for the last three years. This level of commitment will continue until the plan amendment process is completed.

AGENDA STAFF REPORT
CITY OF THE DALLES
Planning Commission

TO: **Planning Commission**

FROM: **Dan Durow, Community Development Director**

DATE: **April 3, 2008**

RE: **Periodic Review Evaluation, and Work Program Review**

ISSUE: Periodic Review of the City's Comprehensive Land Use Plan is required by the Department of Land Conservation and Development (DLCD) every ten (10) years or so. Periodic Review includes several steps. 1. The City evaluates its comprehensive plan and land use regulations to see if any changes are needed. 2. The City develops a Work Program with scheduled work tasks necessary to make the changes. 3. The City completes the work tasks. Periodic Review is over when the tasks are completed and the updated plan is approved by the Department of Land Conservation and Development.

This process is to be completed through the City's Citizen Involvement Program, of which the Planning Commission has been designated the Citizen Involvement Committee to help steer the public involvement. The first step is to review this citizen involvement process and determine that there is adequate process for citizens to participate. The citizen involvement program must provide opportunities for oral and written comments during development of the work program and when it is carried out. Below is additional information on process and the schedule which further describes the time periods for agency and citizen participation.

The ORS require that a notice be published in the local paper informing citizens that periodic review is starting, and that notice must also be provided to those who request it in writing. A newspaper notice of this meeting was published on March 27, 2008. Notice was also sent to the standard list of State, regional, and local agencies including Wasco County. Notice was also sent to the Gorge Commission staff. In addition, all persons that have participated in the process to amend the Urban Growth Boundary (UGB) and requested notice of any urban growth boundary meetings were sent a notice of this periodic review meeting as well. The Planning Commission and City Council meetings are public hearings, not land use hearings, so the City is not expected to collect data in its evaluation of its comprehensive plan and land use regulations as it would in a quasi-judicial hearing.

REVIEW AND APPROVAL PROCESS The Planning Commission considers and recommends to the City Council the proposed Periodic Review Evaluation and Work Program. The evaluation and proposed work program are then submitted for an initial review and comment to the State's Periodic Review Assistance Team (PRAT) for comment. The PRAT's role is to

coordinate State, regional or local public agency comment, assistance, and information into the evaluation and work program development process. During this same comment period, the public and other agencies have 21 days following the Planning Commission meeting for written comments to be submitted. The City Council then reviews the Planning Commission's recommendation and considers any other PRAT, public, agency, or County input before making a final determination on whether a CLUP update is necessary and, if so, what the work tasks and schedule should be.

The following is the proposed schedule:

1. April 3rd; Planning Commission meeting to discuss, get agency and public comment, and review and recommend approval the periodic review evaluation and the proposed work program.
   [Staff report due on March 26th.]

2. April 4th; Start of a 21 day comment period for written agency and public input. Written comment period ends on April 25th.

3. May 12th; City Council meeting to discuss, and review agency and public comment, and approve the periodic review evaluation and the work program.
   [Staff report due on April 30th. This includes staff response to any agency or public comment.]

4. Additionally, a preliminary grant application will be prepared, based upon our best estimate at this time of the cost to complete the Work Program tasks, and submitted to DLCD as soon as possible. Staff has already submitted a draft to DLCD for early review and comment. This draft is based on Phase II of the work program approved by DLCD two years ago. The grant application will be on the May 12th City Council meeting for approval as well. Submitting the preliminary grant now will improve our chances of receiving grant authorization and allow us to get the money very soon after the Council's approval of the Work Plan, with adjustments in the work tasks and grant application as may be necessary at that time.

The Planning Commission should determine whether the established citizen involvement committee, program, and proposed periodic review process and schedule, (as described above) is adequate in providing opportunities for citizen involvement. If so, then it should proceed with the following periodic review evaluation of the CLUP and proposed work program tasks.

Periodic Review Evaluation

Introduction

The Dalles Comprehensive Land Use Plan (CLUP) and urban growth boundary (UGB) were acknowledged by the Land Conservation and Development Commission (LCDC) in 1982. Although The Dalles has been actively engaged in planning and economic development efforts over the last 26 years, its UGB has not changed since its establishment. Although population growth slowed in the 1980s, it has since picked up due to recent economic activity and recognition of the quality of life offered by Columbia River Gorge communities.

While the UGB has remained static, The Dalles has actively planned for the future. Major planning and development accomplishments include:

- Adoption and implementation of a 25-year, Downtown Urban Renewal Plan in 1990 resulting in significant urban renewal development projects, with several more in process;
- Adoption of a major update of the CLUP in 1994, and implementing zoning regulations in following years;
- Completion of the Vision Action Plan in 1995 (two thirds of the strategies had been implemented), and an updated Vision Action Plan in 2002;
- Planning and implementation of a large expansion of the Columbia Gorge Community College campus;
- State designated Enterprise Zone in 1986, again in 1996, and again in 2007;
- Completion and implementation of the Airport Master Plan, with development of a major golf course and resort facility within the next year, and construction of a new municipal water well to serve the airport industrial and commercial development lands;
- Adoption and implementation of The Dalles Transportation System Plan (TSP) with SDC's;
- Completion and implementation of a Storm Water Master Plan with fees;
- Completion and implementation of an updated Sewer Master Plan with SDC's;
- Completion and implementation of an updated Water Master Plan with SDC's;
- Completion and implementation of a Riverfront Master Plan in 1989, and construction of a 10-mile long, 12-foot wide, paved Riverfront Trail (almost complete) and a major Downtown/Riverfront connection project;
- Construction of a looped, fiber optics communication system;
- Adoption and application of a new community center mixed use zoning district;
- Passage of a $4 million bond by the Port of The Dalles to provide infrastructure to the Port's industrial land;
- Attraction and siting of the Google facility and other significant new and expanded businesses to the Port industrial area;

- Approval of the $150,000,000 Lone Pine mixed use PUD which is under construction; and
- Completion of Phase 1 of the City's two-phased program to update the comprehensive plan – as approved by the Department of Land Conservation & Development (DLCD).

In 2005, the City of The Dalles worked closely with DLCD to develop a two-stage, four-year work program to update The Dalles CLUP, UGB, and land use regulations. Phase I, land use needs assessment and policy review, was completed during the summer of 2007 and was funded through a technical assistance grant from DLCD.

Phase I of The Dalles two-phase work program was extremely successful. As a result, the City has prepared and held public hearings on the following studies and plan amendments:

- A coordinated **population projection** with Wasco County - adopted by The Dalles and Wasco County and approved by the State. The Dalles population is expected to increase from 15,472 in 2006 to 22,545 by 2026, at an average annual growth rate of 1.9%.
- An **Economic Opportunities Analysis** (EOA) – which is the basis for determining industrial, commercial and other employment land needs and site requirements. The Dalles found that all of its industrial needs can be met through redevelopment of abandoned Northwest Aluminum site. However, the existing UGB is inadequate to accommodate the needs of a new regional center, a neighborhood center and a business park. Expansion of the UGB by about 100 acres is necessary to provide land for retail and business park employment opportunities.
- A **Residential Land Needs Analysis** (RLNA) – which is the basis for determining residential and public / semi-public land needs. The Dalles adopted a number of efficiency measures to increase residential densities and provide a greater variety of housing types in 1993. Actual densities since then have averaged about 6.25 dwelling units per net acre. After including additional measures to increase density in the Comprehensive Plan, net residential densities will increase by an additional 12% to 7.0 units per net acre. After accounting for school, park and other institutional needs, The Dalles must expand its UGB by 541 buildable acres to meet anticipated residential and public / semi-public land needs.
- An **Energy Conservation Program**. The Dalles CLUP includes a new section designed to increase energy efficiency. Conservation measures include nodal mixed use development, investment in transit facilities, solar access provisions, and reduction in vehicle miles traveled through urban design.
- A **Buildable Lands Inventory** (BLI) for the UGB and four alternative UGB expansion study areas. The Dalles conducted a detailed BLI that considered redevelopment potential (especially in industrial areas), residential infill, and more intensive development of vacant sites within the UGB. The Comprehensive Plan now includes policies to protect stream corridors and to restrict development on slopes of 20% or greater to minimize

impacts on scenic views and to address potential slide hazards. Automatic density transfer provisions ensure that urban densities on buildable land will increase. After accounting for development of buildable land within the UGB, The Dalles still needs to expand its UGB by approximately 641 gross buildable acres to accommodate Year 2026 growth needs.

- A **UGB Alternatives Analysis** consistent with Goal 14, ORS 197.298 priorities, and the Urban Growth Boundary administrative rule (OAR Chapter 16, Division 24). The Dalles applied the buildable lands methodology used inside the UGB to four study areas on the Oregon side of the river to determine the capacity of each study area. The City considered ORS 197.298 priorities by avoiding expansion into high value orchard and wheat areas, carefully analyzed public facilities costs, and minimized adverse social consequences (scenic impacts) by proposing expansion into adjacent exception areas and Hidden Valley – and area with relatively poor agricultural soils that is not highly visible from key viewing areas in the Columbia River Gorge.
- An **Urban Reserve Area** land needs projection and alternatives analysis, consistent with OAR Chapter 660, Division 021. The City projected land needs through the Year 2056 based on a coordinated population projection adopted by both the City and Wasco County. After including nearby exception areas and the relatively poor, non-irrigated soils in Hidden Valley, longer-term growth was directed away from irrigated cherry orchards to higher-elevation, non-irrigated wheat lands *outside* the Columbia River Gorge National Scenic Area boundary. The City Council adopted the Urban Reserve Area in 2007, and is ready for review and adoption by the Wasco County Court.
- *Draft* findings to support a **"Minor Amendment" to the Columbia River Gorge Management Plan** to "exempt" area within the proposed UGB from the provisions of the act. The analysis showed how the UGB / urban exempt area proposal minimized potential scenic impacts and avoided "special management areas." By expanding the UGB into adjacent exception areas and Hidden Valley – an area hidden from most "key viewing areas" by hills and ridgelines – the City believed that it had made a good faith effort to minimize potential scenic impacts, preserve highly scenic orchard lands, as required by the Columbia River Gorge National Scenic Area Act (NSAA).
- A **reorganized and extensively revised CLUP**. The Dalles CLUP has been reorganized into a three volume set: Volume I – Plan Policies; Volume II – Background Studies; Volume III – Public Facilities Master Plans; and Volume IV- Implementation. New policies have been drafted to ensure consistency with Statewide Planning Goals 5, 7, 8, 9, 10, 11, 12, 13 and 14. Policies addressing scenic, archeological, historical, and ecological impacts are also included in the draft plan, to address issues raised by Gorge Commission staff.

- A proposed **Comprehensive Plan Map** showing generalized plan urban and future urban plan designations for the entire URA and UGB area.

The City has conducted a series of work sessions and public hearings before the Planning Commission and City Council for the proposed comprehensive plan amendments, the 20-year UGB and urban exempt area proposal; and the 50-year URA. The UGB and URA proposal is supported by detailed findings demonstrating compliance with applicable Oregon Statewide Planning Goals. The DLCD reviewed the proposed UGB and accompanying plan amendments favorably.

However, the City Council has delayed adoption of the CLUP and UGB amendment package pending review by the Columbia River Gorge Commission (Gorge Commission). Under federal law, the area proposed for UGB expansion must first receive an "urban area" exemption under the Columbia River Gorge National Scenic Area Act (NSAA). The City has prepared preliminary findings for a "minor amendment" to the Columbia River Gorge Management Plan to "exempt" the proposed UGB expansion area from further review under the NSAA. However, Gorge Commission staff has advised the City that *substantial original* research and evaluation is necessary to support such an exemption. (See NSAA discussion below.) Based on the EOA and HNA, Goals 9 (Economy of the State) and 10 (Housing) *cannot* be met unless and until the UGB has been amended to include a 20-year land supply. Compliance with Goal 14 (Urbanization) is a necessary but not sufficient condition for amending The Dalles UGB. Compliance with the NSAA is also required for such an amendment. Moreover, detailed master planning for Goals 11 (Public Facilities) and 12 (Transportation) cannot proceed with any certainty until there is an approved UGB. Therefore, **the City cannot meet its obligation to provide sufficient buildable employment and residential land without approval of an "urban area exemption" by the Gorge Commission.**

The Dalles is the first City to propose UGB / Urban Exempt Area amendments that are intended to ensure a 20-year land supply as required by Goal 14, Urbanization. Although the City made a good faith effort to address NSAA requirements, Gorge Commission staff felt that the City had not done enough to justify an urban area exemption from the NSAA. The Gorge Commission also held a work session on the matter and agreed with staff that additional comparative analysis of potential archeological impacts, scenic impacts, and ecological impacts is required. Moreover, the City has been advised that the capacity of Dallesport – across the river in Washington State – must also be considered before granting Urban Exempt Area status.

Evaluation

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.

Does the economic development element of the comprehensive plan need to be updated? Yes.

(A) *Does new information on national, state, or local economic trends show any changed circumstances since the plan was last updated?* Yes. *Does the new information need to be incorporated into the plan?* Yes, as determined in the Economic Opportunity Analysis. The draft, updated comprehensive land use plan (CLUP) reflects this information.

(B) *Has there been a change in your community's assessment of the types of industrial and commercial businesses that are most likely to develop in your area?* Yes. *Does your community have sufficient buildable sites that are suitable for these types of uses?* No. As determined in the EOA and reflected in the draft, updated CLUP.

(C) *Is your plan out-of-date regarding an accurate inventory of suitable industrial and commercial sites?* Yes. As determined in the EOA and reflected in the draft, updated CLUP.

(D) *Does the inventory of commercial and industrial land identify sites that are available now or can be made available quickly?* Yes. *That is, does the inventory address a short-term supply of employment land (i.e., ready for construction within one year of application for building permit or request for service extension)?* Yes. As determined in the EOA and reflected in the draft, updated CLUP.

(E) *Does the inventory identify sites needing additional attention in order to make them suitable for industrial or commercial uses (e.g., wetland delineation, transportation improvements, provision of water or sewer)?* Yes. As determined in the EOA and reflected in the draft, updated CLUP.

(F) *Are there sites zoned industrial that are unlikely to develop because of transportation access issues, environmental factors, topography, or other constraints?* No.

(0) *Is there less than a 20-year supply of vacant or redevelopable buildable employment land (industrial, commercial, institutional, and other employment lands) within your community's urban growth boundary?* Yes. As determined in the EOA and reflected in the draft, updated CLUP.

(H) *Does your community have an insufficient supply of industrial and commercial sites that can be served by public facilities projects, either existing or scheduled to be built within the next five years?* No

(I) *Has your community lost suitable industrial sites through rezoning for other uses?* Yes.

(J) *What plan or regulatory amendments are needed to respond to changes in economic*

development trends in your community? Answer: See the draft, updated CLUP for recommended changes. The Land Use and Development Ordinance (LUDO) will need to be updated upon adoption of the CLUP ordinance amendments.

2. *Does recent information on population and housing trends suggest a need to update your comprehensive plan or land use regulations?* Yes.

   (A) *Has the city adopted a population projection coordinated by the county?* Yes. *How old is that forecast?* 2007. *Does it need to be updated to extend at least 20 years into the future from now?* No.

   (B) *Has the distribution of household incomes remained consistent in the community since the housing element of the comprehensive plan was last updated?* Yes, please see Residential Land Needs Analysis.

   (C) *Are the costs of new housing units affordable based on projected household incomes?* Answer: Don't know, no data available.

   (D) *Does the city provide the types, locations and densities of housing needed by all of its residents?* Answer: Yes.

   (E) *Are buildable residential lands being developed at the rate projected in the comprehensive plan?* Answer: No. As determined in the Housing Needs Analysis and reflected in the draft, updated CLUP. One reason for this is the lack of buildable land within the existing UGB.

   (F) *Is there a significant difference between the gross amount of residential lands developed since plan was the last updated and what the plan data predicted?* Yes. As determined in the Housing Needs Analysis and reflected in the draft, updated CLUP.

   (0) *Are your zoning and development ordinances well organized and user-friendly?* Yes, for the most part, but there is always room for improvement. *Are your residential development and design standards for needed housing clear and objective?* Yes. *When did your community last evaluate its development processes and standards?* Last year. Reviews are done annually. *Are there provisions that should be amended or eliminated to better reflect your community's vision?* Yes, especially as determined in the draft, updated CLUP.

   (H) *Have all of your ordinances been amended to fully comply with the federal Fair Housing Act and state manufactured home statutes?* Yes.

   (I) *Does your community have minimum density requirements for each zoning district?* **No**

Does your community have a minimum average density policy for overall residential development? Draft plan policies call for establishing a density range and for automatic density transfer / cluster provisions which would have the effect of density averaging. These policies must be implemented, however, by amending the zoning ordinance.

(J) Are the zoning ordinance densities consistent with the comprehensive plan? Not completely. The proposed work program calls for updates to the zoning ordinance consistent with draft plan policies regarding residential density ranges.

(K) Has the mix of housing types (i.e., single-family and multi-family) constructed since your last plan update been built as expected? No.

(L) Have housing providers been successful in satisfying the housing needs of low income citizens and citizens with special housing requirements? If not, what actions need to be taken to address these needs? Not sure. The Mid-Columbia Housing Agency has developed low income housing as well as 24 units provided as part of the Commodore II project..

(M) Does the comprehensive plan include a thorough, up-to-date residential buildable lands inventory and housing needs assessment? Yes, As determined in the Housing Needs Analysis and Buildable Lands Inventory, and reflected in the draft, updated CLUP.

(N) Is there a 20-year supply of vacant or redevelopable buildable land or land with infill potential in the following categories? Answer: No, not within the existing UGB. The proposed UGB includes an adequate supply of buildable land for needed housing types identified by statute and in the Residential Land Needs Analysis completed in 2007.

(0) If a shortage exists in any of the categories above, how will the discrepancy be resolved? The existing plan has shortages, the draft, updated CLUP resolves these shortages. *Has your jurisdiction considered or pursued opportunities such as re-zoning, up-zoning, adopting a redevelopment or urban renewal plan, encouraging infill development, partnerships with private or non-profit housing developers, discouraging conversion of rental apartments to condominiums, or adding land to the UGB?* Yes, in the draft, updated CLUP.

(P) What plan or regulatory amendments are needed to respond to changes in population and housing trends in your community? As determined in the Housing Needs Analysis and reflected in the draft, updated CLUP. See also Residential Land Needs Analysis.

3. Do the plan and ordinances adequately account for limitations on buildable lands from

natural resources and hazards? Yes, as determined in the draft, updated comprehensive land use plan.

(A) *Have the plan and ordinances been updated to comply with OAR 660, Division 23 (the Goal 5 rule) regarding wetlands, riparian corridors, and wildlife habitat?* The existing CLUP does not but the draft, updated CLUP addresses does address these. However, the NSA requirements are greater and will need to be reviewed to a higher level.

(B) *Has the jurisdiction received any new, updated, or revised information regarding floodway or floodplain boundaries or geologic or other hazards that needs to be addressed in the plan?* No.

4. *Are public facility and transportation plans and financing mechanisms adequate to accommodate planned growth in a timely fashion?* The City's water, sewer, storm and transportation master plans have all been recently updated to meet the current CLUP needs. However, these master plans will need to be further updated upon approval of the updated CLUP as part of Phase II of the two phase planning update.

(A) *Has the jurisdiction been unable to provide services for development of residential and employment land according to the schedule in the public facilities plan?* No. However, this will need to be reviewed in the update of the master plans based upon the Updated CLUP.

(B) *Have there been changes to any of the following conditions that were not anticipated by the public facilities or transportation systems plans?* Yes.

- *Changes in population, housing or employment* Yes, based upon the updated CLUP
- *Urban growth boundary amendments* Yes, as anticipated in the updated CLUP
- *Master plan updates* All recently updated
- *Major plan map or zoning amendments* Yes.
- *Significant consumers or users that were not anticipated* Yes.
- *Facility projects built or delayed* Yes. Wastewater treatment plant upgrade
- *Other*

(C) *Have any of the conditions in (B) above changed to the extent that the plan or the project list in a public facilities or transportation system plan needs to be revised?* Yes,

(D) *Does your list of short-term public facility projects need to be updated?* Yes, based upon the draft, updated CLUP

(E) *Does your community satisfy state and federal standards for the quality of water supplied, quality of water discharged from your treatment plant, and quality of storm water discharge (if applicable)?* Yes.

(F) *Are financing sources sufficient to cover the cost of capital construction projects?* Yes, for many water, sewer, and storm projects. No for many transportation projects.

(0) *Do the financing sources need revisiting to meet future needs? What actions will be taken to address this issue?* Yes. Annual budgeting process.

5. *Is there new information affecting the comprehensive plan that has not yet been incorporated into the plan?* Yes, mostly having to do with the NSA requirements.

(A) *New information provided by state agencies is listed on the attached sheet. Does any of this information need to be addressed in your plan? If so, how?* Yes, staff has been in communication with Mark Radabaugh, the Warm Springs Tribe, Gorge Commission staff, the Port, OECD, and ODOT throughout the Phase I process and continuing in the periodic review evaluation process.

(B) *Is there any other new information available relating to economic development, needed housing, transportation, public facilities and services or urbanization that needs to be included in your plan?* The draft, updated CLUP addresses these issues.

6. *Have changes in local goals or objectives occurred since adoption of the comprehensive plan that require amendments to the plan or land use regulations relating to economic development, needed housing, transportation, public facilities and services and urbanization?* Yes.

(A) *For example, does the adoption of a regional economic development strategy or changes in economic opportunities necessitate modification of plan policies?* Yes, as indicated in the EOA study, and included in the draft, updated CLUP.

(B) *Are there new community goals or objectives (or changes to existing ones) that need to be addressed in the comprehensive plan?* These have been addressed in the draft, updated CLUP

(C) *Are there goals, objectives, or policies in the comprehensive plan that are no longer applicable and should be deleted or amended?* Yes, for the existing CLUP

(D) *Have all plan policies that obligate your jurisdiction to implement specific*

provisions in the future been carried out (e.g., a policy to complete planning for a wildlife habitat or historic resource when more complete inventory information is available)? If not, what additional planning work needs to be carried out in periodic review? The updated CLUP will need to be implemented through the LUDO.

7. *What major activities or events affecting land use have occurred that were not anticipated in the plan, but which may necessitate updating the plan? For example, did a major new employer site in your city, with unanticipated effects on roads, water, sewer, and/or housing supply?* Over the past several years new, and existing, businesses have developed in The Dalles creating the need for more industrial and commercial land areas.

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.

Are land use decisions made according to your acknowledged comprehensive plan and land use regulations achieving the purpose and intent of Statewide Planning Goals 9, 10, 11, 12 and 14?

(A) *Have prospective employers passed over the city because permitting procedures were too onerous or because approved plan changes have reduced or eliminated your supply of available and suitable employment sites?* No.

(B) *Do your plan policies and zoning regulations provide for the housing needs of the residents of the jurisdiction?* No. *Are any housing types needed now or in the next 20 years not permitted in the jurisdiction?* No. *Are applications for needed housing getting denied because of discretionary approval criteria or conditional use permit requirements?* No.

(C) *Have developments permitted by your plan and code exceeded the capacity of transportation, water, sewer, or storm water management facilities?* No.

(D) *Do your plan and code allow development of inefficient land use patterns that increase the costs of public facilities and services and consume an unnecessary amount of land, such as through large minimum lot size standards, no maximum or average lot size standards, excessive on-site parking space requirements, excessive block length and street width standards, excessive yard setback and buffer standards, a predominance of large-lot single-family zoning, no mixed-use development, no provision for accessory dwelling units ("granny flats"), or one-story height limits on commercial and industrial development?* Few, if any, of these situations exits in the CLUP or implementing ordinances.

2. *Are any of your implementation measures inadequate to carry out the policies of the comprehensive plan relating to economic development, needed housing, transportation, public facilities and services and urbanization?* Yes, as determined in the draft, updated

CLUP. *For example, does your plan identify a targeted employer, but your industrial zone does not permit the use?* Yes. *Has your jurisdiction adopted a transportation system plan, but not implementing ordinances adequate to carry out the plan?* No.

- *Does the TSP call for major improvements to state highways for which ODOT has not agreed that funding for the needed improvements are "reasonably likely" to be provided during the planning period?* ODOT does not have sufficient funds for the foreseeable future, and the future is not bright.

- *Does the plan address the state's objective of reducing or stabilizing "VMT" (vehicle miles traveled per capita)? Yes, as determined in the Energy Conservation Program.* Yes, as determined in the Energy Conservation Program.

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.

Is the level of coordination between the city and county, other cities, special districts, and state and federal agencies adequate to effectively implement the comprehensive plan? Yes. *Do your urban growth boundary management agreement and/or urban service agreements need to be updated?* Yes.

(A) *Do you share resources or facilities with other jurisdictions?* Yes. *Are these adequate for all the jurisdictions involved?* Yes, in most areas. *Do you have agreements regarding allocation of resources, capacity, etc.?* Yes.

(B) *What special districts provide services within your urban growth boundary?* Chenoweth Water PUD. *Are these special districts participating in your planning process?* Yes. *Does the city have management agreements with those special districts providing services within the urban growth boundary consistent with ORS 195.065?* No.

(C) *Is the city/county urban growth management agreement functioning to adequately coordinate land use decisions inside the urban growth boundary?* Yes.

(D) *Are there other coordination issues that need to be addressed?* No.

2. *What regional or state plans, programs or issues affecting land use may call for amendments to the comprehensive plan in order to bring your plan and land use regulations into compliance with the statewide planning goals related to economic development, housing, public facilities and services, transportation, and urbanization?*

(A) *Have you contacted appropriate state agencies to participate in your periodic review process?* Yes.

(B) *Has a state agency notified you of an adopted plan or program affecting land use that needs to be addressed in your plan? If yes, what is the plan or program?* No.

(C) *Are there housing needs identified in the statewide or county Consolidated Plan that have not been addressed in your comprehensive plan?* These have been addressed in the draft, updated CLUP

(D) *Does the plan address the Regional Investment Strategy for your area?* Yes. *Are there actions needed to coordinate with or implement the strategy?*

(E) *How has the city coordinated transportation issues with other local governments and the state?* Yes. Transportation issues have been coordinated with the ODOT and Wasco County. These include the Chenoweth IAMP, Lone Pine roundabout, annexation of county roads within the existing UGB, and development of the annual street development list.

- *Does the plan contain strategies for dealing with access management, new commercial development accessed by state highways, or the potential impacts of any new major transportation system project?* Yes, in the draft, updated CLUP.

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.

1. *What other issues relating to the periodic review standards need to be addressed within the scope of periodic review?* The National Scenic Area standards for Urban Area exemption.

2. *What local issues related to economic development, needed housing, transportation, public facilities and services and urbanization would you like to address within your periodic review work program?* See attached, draft work program

(A) *Has your jurisdiction been successful in complying with the statutory 120-day time limit for final action on development permits?* Yes. *If no, what has been the cause of delays?*

(B) *Do you feel your plan and land use regulations are difficult to implement?* No, but there is always room for improvement. *Should steps be taken to streamline the plan, zoning ordinance, and permit process?* Yes, where ever possible.

This is the end of the staff's draft evaluation for whether a periodic review work program should be developed. Staff recommends that a periodic review Work Program is necessary to complete the work necessary to amend the UGB, National Scenic Area UEA, and establish the Urban Reserve Boundary, and has attached a draft for the Planning Commission's consideration.

After the staff presentation on the draft work program tasks, the Commission should then receive any agency or public input on the draft Periodic Review evaluation and Work Program tasks in the public and agency testimony portion of the meeting.

PROPOSED MOTION

Staff recommendation

....move to recommend to the City Council that the draft Work Program be approved based on the Periodic Review evaluation and after any other agency or public input has been received. Approval of the Work Program is necessary in order to complete the proposed Comprehensive Land Use Plan and Urban Growth Boundary amendments begun several years ago.