



City of Tigard Memorandum

To: Mayor Dirksen and City Council

From: Darren Wyss, Senior Planner

Re: Supplemental Staff Report - CPA2011-00002

Date: May 11, 2011

On May 10, 2011, City Council held a public hearing regarding the Tigard 2011 Economic Opportunities Analysis (CPA2011-00002). Council took public testimony, closed the public hearing, and directed staff to return with alternative definitions based on the letters submitted by the Oregon Department of Transportation (ODOT) and Metro.

As part of CPA2011-00002, the city proposed to adopt an expanded Tigard Town Center boundary through a definition in the Tigard Comprehensive Plan that referenced the Metro Title 6 map. Council passed Resolution 10-24 in May 2010 supporting a boundary change proposal to Metro. In December 2010, Metro changed the Tigard Town Center boundary on its Title 6 map as proposed in Resolution 10-24. The final step was city adoption of the expanded boundary.

Initial indication from Metro was that the approach of using a definition would be sufficient to comply with Title 6. ODOT submitted a letter (see Exhibit C) to the Planning Commission disputing the sufficiency of the definition approach. Planning Commission made its decision, but suggested staff secure a letter from Metro stating its position. Metro sent a letter (see Exhibit C) in advance of the Council public hearing stating the definition approach is not sufficient. The city will need to bring forward a separate amendment adopting a map. As a result of the letters, the reference to Title 6 maps is not needed and it is proposed to be removed from the Planning Commission recommended definitions as follows:

Metro-designated Corridor or High Capacity Transit Corridor – a Metro design-type, whose boundary is defined on the Metro Title 6, Centers, Corridors, Station Communities and Main Street Map, that are located along major transportation routes and feature increased densities, a high-quality pedestrian environment, and convenient access to transit.

Metro-designated Regional Center or Washington Square Regional Center – a Metro design-type, whose boundary is defined on the Metro Title 6, Centers, Corridors, Station Communities and Main Street Map, that focuses on compact development, redevelopment and high-quality transit service, multimodal street networks, and act as major nodes along regional through-routes.

Metro-designated Town Center or Tigard Town Center – a Metro design-type, whose boundary is defined on the Metro Title 6, Centers, Corridors, Station Communities and Main Street Map, that provides local shopping, employment, and services with compact development and transit service.



April 15, 2011

Darren Wyss
Senior Planner
Community Development
City of Tigard
13125 SW Hall Boulevard
Tigard, OR 97223

Re: Metro staff comments on proposed amendments to Tigard's Comprehensive Plan (CPA 2011-00002)

Dear Mr. Wyss:

Thank you for the opportunity to review and comment on the proposed amendments to Tigard's Comprehensive Plan and the city's draft 2011 Economic Opportunities Analysis (EOA). The EOA is an important source of information for informing the City's update of its comprehensive plan. Metro staff finds the draft EOA to be a thoughtful analysis of Tigard's future employment growth and believes that its underlying assumptions are sound and reflect regional coordination. Staff finds the Comprehensive Plan amendments supportive of regional policies, though we have a concern about the approach to the town center boundary as proposed. More specific comments follow.

Center boundaries

The proposed amendments to the Tigard Comprehensive Plan include adoption of the Tigard Town Center and other boundaries in the glossary with reference to Metro's maps of centers and corridors and employment and industrial areas. In December 2010, Metro Council amended the titles in the Urban Growth Management Functional Plan (UGMFP) that specify the process for local jurisdictions to adopt a boundary designating a center or corridor. Prior to December, local jurisdictions were required to adopt center and corridor boundaries, as specified in Title 1 of the UGMFP. The December Metro ordinance changed that requirement to one in which a city is required to adopt boundaries and take other actions in order to be eligible for regional investments such as high capacity transit as well as to be eligible for ODOT's lower mobility standards and standards in the transportation planning rule. The adoption of the boundaries is an important part of a package of actions that signal that a community is taking the steps to focus investments and adopt policies to support more compact development consistent with regional policies for centers.

Staff finds the proposed approach of including the definition of the boundary in a glossary does not meet the intent of Title 6 and may be unclear to citizens interested in understanding the location of the centers in Tigard. In May 2010, Tigard City Council adopted Resolution 10-24, which "...expressed support for the preparation and submission of a Tigard Town Center boundary change..." to the Metro Council. In December, the Metro Council amended the 2040 Growth Concept Map and the map of center boundaries to reflect the intent expressed in Tigard's resolution. We encourage the city to proceed with other proposed amendments to the Comprehensive Plan (including adoption of the EOA), and, in order to be eligible for regional investments and other incentives, make center boundary designations in a separate ordinance, which clearly depicts the boundary on a map and follows the notice requirements in section 3.07.620 B4 of Metro's UGMFP.

Employment forecast

Tigard's EOA is informed by the region's most recently adopted forecast allocation (2005 to 2030). The use of this forecast helps to ensure regional coordination. The EOA includes appropriate adjustments to reflect the impacts of the recent recession. The EOA's use of a range forecast is also a useful approach given the significant economic uncertainty created by the recession. Finally, the EOA's assessment of the clusters that may grow in Tigard balances a realistic analysis with city aspirations.

Employment capacity

We appreciate the use of buildable land inventory data that are consistent with data used in the 2009 urban growth report (UGR). As with the EOA's use of the most recent regional forecast allocation, the use of the regional buildable land inventory data helps to ensure coordination.

The draft EOA recognizes the important role that redevelopment will play in providing future employment capacity. The refill assumptions used in the EOA are, in fact, more ambitious than those modeled for the 2009 UGR (for the Inner Westside market subarea), but are justifiable given the city's intention to focus growth within its existing urban service area.

Space usage assumptions and land need

We find the EOA's assumptions about employment space usage to be reasonable and consistent with those used in the 2009 UGR. These assumptions include square footage per employee and floor area ratios for different building types. Metro staff supports the EOA's recommendation to pursue an efficient land need scenario, focusing a significant amount of growth in downtown Tigard, Washington Square Regional Center, the Tigard Triangle, and along the Southwest High-Capacity Transit corridor.

Policy and implementation action recommendations

Metro staff is supportive of the policy and implementation action recommendations found in the EOA, including the protection of large lots for industrial uses, the promotion of employment in centers and corridors, and the stated intention to work with ODOT and Metro to develop alternative mobility standards that complement the city's aspiration to promote growth in its centers and corridors.

Sincerely,



Ted Reid

Associate Regional Planner

cc: Robin McArthur, Planning and Development Director
Chris Deffebach, Long Range Planning Manager
Gerry Uba, Principal Regional Planner



Oregon

John A. Kitzhaber, MD, Governor

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April 4, 2011

City of Tigard Planning Commission
City of Tigard
13125 SW Hall Blvd
Tigard, OR 97223

SUBJECT: CPA 2011-00002

The Oregon Department of Transportation (ODOT) has reviewed the proposed language adopting the Tigard 2011 Economic Opportunities Analysis and amending the Comprehensive Plan Glossary. We understand that it is the City's intent to amend the Tigard Town Center boundary to include the Tigard Triangle area (defined in the CP Glossary as the area of Tigard bounded by Pacific Hwy OR 99W, I-5, and OR 217), but this is not clear from the package provided to the Planning Commission for its April 4, 2011 meeting. No map has been provided showing revised Town Center boundaries and there is no description of a proposed action adopting or amending the Town Center boundary or other 2040 design type boundaries.

Issue 1: The proposed Glossary definitions reference incorrect map boundaries

The proposed Glossary definitions reference boundaries "defined on the Metro 2040 Growth Concept Plan". However, the Metro 2040 Growth Concept Plan Map only depicts general locations of 2040 Centers. The Planning Commission and City Council should be aware that Metro does not adopt or designate specific 2040 Growth Concept Center boundaries, but depicts locally adopted boundaries on the Urban Growth Management Functional Plan (UGMFP) Title 6 *Centers, Corridors, Station Communities, and Main Streets Map*, as well as in its State of the Centers Report and other publications.

Issue 2: The City of Tigard did not follow requirements set forth in UGMFP Title 6, section 3.07.620.B.4, and did not provide notice to ODOT of a proposed boundary action

While the City's intended Town Center boundary is currently shown on the *Centers, Corridors, Station Communities, and Main Streets Map*, that boundary is not based on adoption by City Council following notice to ODOT, and therefore is not valid in our opinion.

The UGMFP Title 6, section 3.07.620.B.4 specifically requires that "*Center boundaries be adopted and may be revised by the City Council ... following notice of the proposed boundary action to the Oregon Department of Transportation and Metro in the manner set forth in subsection A of section 3.07.820 of this chapter*". The City's request to Metro in December of 2010 to show the Tigard Triangle area as part of the Town Center did not follow this process as there was no City Council adoption and no notice was provided to ODOT. The proposed adoption *at this time* of amendments to the Comprehensive Plan Glossary - referencing a different Metro map - does not constitute adoption by City Council of a proposed boundary action.

Issue 3: The proposal lacks a Plan of Actions and Investments and land use regulations for the Town Center area, per Section 3.07

It is not clear what the City's intent is in revising its Town Center boundaries to include the Tigard Triangle. If the City wishes to be eligible for regional investments, lower mobility standards, and

lower trip generation rates, as set forth in the UGMFP Title 6, the Planning Commission and City Council should be made aware that adoption of Town Center boundaries is not sufficient to gain such eligibility. In addition to adoption of a Center boundary, Section 3.07.620 requires performance of an Assessment and adoption of a Plan of Actions and Investments to enhance the Center in order to be eligible for regional investments.

In addition to adoption of a boundary, Section 3.07.630.A requires adoption of land use regulations to allow the mix and intensity of uses specified in subsection B of section 3.07.620 of the UGMFP in order to be eligible to apply the V/C standards applicable to Town Centers in Table 7 of the Oregon Highway Plan (OHP). Table 7 designates Pacific Highway 99W in Tigard (from I-5 to Tualatin Road) as an Area of Special Concern with a V/C standard of .95, so the Town Center V/C standards of 1.1 and .99 do not apply to OR 99W. It is the intent of ODOT, Metro, and the City of Tigard to develop alternative mobility standards along OR 99W as part of the Southwest Corridor Transportation Refinement Plan, which would replace both the Area of Special Concern and the Town Center V/C standards. Alternative mobility standards will be designed to allow adoption of higher densities and intensities of land uses supportive of High Capacity Transit in the corridor. ODOT is supporting this effort through its TGM grants for the Tigard HCT Land Use Plan and the SW Corridor Refinement Plan, as well as with significant additional resources.

Issue 4: The proposal lacks transportation actions to support the reduced trip generation rate assumptions for a Town Center.

Finally, section 3.07.630 B applies to eligibility for trip reduction credits as part of Plan Amendments subject to the Transportation Planning rule (TPR) section -0060. In addition to adopting boundaries and land use regulations to allow the appropriate mix and intensity of land uses, the City must adopt a number of transportation actions that support the reduced trip generation rate assumptions, including local and arterial street design and connectivity, bicycle and pedestrian improvements, TSM and TDM, and a parking management program.

Summary

In summary, the proposed Comprehensive Plan Amendment does not constitute adoption of Center boundaries. More importantly, the City will need to adopt land use and transportation provisions in addition to Center boundaries in order to be eligible for regional investments, lower mobility standards, and lower trip generation rates. ODOT is supportive of the City's vision for its future and looks forward to continuing to work with the City on these critical additional steps.



Lidwien Rahman
Principal Planner
Oregon Department of Transportation

**STAFF REPORT TO THE
PLANNING COMMISSION
FOR THE CITY OF TIGARD, OREGON**



120 DAYS = N/A

SECTION I. APPLICATION SUMMARY

FILE NAME: TIGARD 2011 ECONOMIC OPPORTUNITIES ANALYSIS ADOPTION

FILE NO.: Comprehensive Plan Amendment (CPA) CPA2011-00002

PROPOSAL: To adopt the Tigard 2011 Economic Opportunities Analysis as a component of Tigard Comprehensive Plan Goal 9: Economic Development; to amend the current Tigard Comprehensive Plan Goal 9: Economic Development goals, policies, and recommended action measures; and to amend Tigard Comprehensive Plan Glossary.

APPLICANT: City of Tigard
13125 SW Hall Boulevard
Tigard, OR 97223

OWNER: N/A

LOCATION: Citywide

ZONING

DESIGNATION: All City zoning districts

COMP PLAN: All City comprehensive plan designations

APPLICABLE REVIEW CRITERIA:

Community Development Code Chapters 18.380 and 18.390; Comprehensive Plan Goals 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and Special Planning Area: Downtown; Metro Urban Growth Management Functional Plan Title 4; Oregon Administrative Rule 660, Division 9; and Statewide Planning Goals 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14.

SECTION II. STAFF RECOMMENDATION

Staff recommends the Planning Commission finds this request to meet the necessary approval criteria and RECOMMENDS the Tigard City Council amends the Tigard Comprehensive Plan as determined through the public hearing process.

SECTION III. BACKGROUND INFORMATION

Project History

The City of Tigard is in State Periodic Review. One of the required Periodic Review work tasks is to conduct an economic opportunities analysis. The City received grant funds from the Oregon Department of Land Conservation and Development for technical consultant assistance to complete this task.

The *Tigard 2011 Economic Opportunities Analysis (Tigard 2011 EOA)* was developed in compliance with OAR 660 Division 9 (Statewide Planning Goal 9: Economic Development) and is a technical study that compares projected demand for land for industrial and other employment uses to the existing supply of such land. The purpose of the *Tigard 2011 EOA* is to improve opportunities for Tigard to attract and maintain the type and quality of employment desired by its citizens, grow its economy, and maintain its quality of life. Goal 9 emphasizes the preservation and protection of vacant land for industrial and employment uses. This will happen by adopting policies that ensure an adequate supply of industrial and other employment lands within the City of Tigard.

The Tigard Planning Commission acted as the advisory committee for the project, reviewing each task during the process to complete the *Tigard 2011 EOA*. The six tasks reviewed by the Planning Commission included:

1. Economic Development Vision and Goals
2. Economic Trends Analysis
3. Site Suitability Analysis (Land Demand)
4. Inventory of Suitable Sites (Land Supply)
5. Assessment of Potential (Reconciliation of Demand and Supply)
6. Implementation Policies and Action Measures

The tasks included examining key demographic and employment opportunities and trends to assess Tigard's economic development potential, projecting employment growth, and determining short- and long term demand for employment land. This demand is compared to an inventory of suitable commercial and industrial properties (supply) to assess the sufficiency of immediate and longer-term (20-year) supply of commercial and industrial employment land in the City's Urban Planning Area (UPA).

The document meets the state requirements for an economic opportunities analysis and acts as a resource for staff, decision makers, and the public. It identifies the preferred land need scenario that will accommodate the type of economic development activity projected and wanted by the community. One important task in the development of the *Tigard 2011 EOA* was to consider land use planning efforts already completed and the City's expectations for redevelopment of its centers and corridors. This allowed the process to build upon previously adopted plans to ensure consistency and continuity.

The *Tigard 2011 EOA* serves as a component of the *Tigard Comprehensive Plan* Goal 9. It identifies the amount of needed employment and industrial land for the next 20 years and recommends goals and policies to preserve this land. These goals and policies will help to guide future decisions so it was important to ensure the goals and policies were coordinated with the entire Comp Plan. As part of the process, existing Goal 9 language, which was revised and adopted in March 2008, proved to be very comprehensive and only minor changes were recommended. In general, all goals

and policies contained within the *Tigard Comprehensive Plan* are intended to be supportive of one another.

Proposal Description

The primary intent of the amendment is to ensure the City's Comprehensive Plan remains a viable tool for decision-makers. By adopting the amendment, the City will ensure it is in compliance with applicable laws, rules, regulations, plans, and programs. As importantly, the update will also ensure that Goal 9 of the Comprehensive Plan reflects current community conditions and values.

SECTION IV. SUMMARY OF REPORT

Applicable criteria, Commission findings and conclusions

- Tigard Community Development Code
 - o Chapter 18.380
 - o Chapter 18.390
- Applicable Comprehensive Plan Policies
 - o Chapter 1: Citizen Involvement
 - o Chapter 2: Land Use Planning
 - o Chapter 5: Natural Resources and Historic Areas
 - o Chapter 6: Environmental Quality
 - o Chapter 7: Hazards
 - o Chapter 8: Parks, Recreation, Trails, and Open Space
 - o Chapter 9: Economic Development
 - o Chapter 10: Housing
 - o Chapter 11: Public Facilities and Services
 - o Chapter 12: Transportation
 - o Chapter 13: Energy Conservation
 - o Chapter 14: Urbanization
 - o Special Planning Area: Downtown
- Metro Urban Growth Management Functional Plan Title 4
- Oregon Administrative Rule 660, Division 9
- Statewide Planning Goals
 - o Goals 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14.

City Department and outside agency comments

SECTION V. APPLICABLE CRITERIA AND COMMISSION FINDINGS

CITY OF TIGARD COMMUNITY DEVELOPMENT CODE (TITLE 18)

Chapter 18.380: Zoning Map and Text Amendments

Chapter 18.380.020 Legislative Amendments to the Title and Map

A. Legislative amendments. Legislative zoning map and text amendments shall be undertaken by means of a Type IV procedure, as governed by Section 18.309.060G

Findings: The amendment to the Tigard Comprehensive Plan establishes policies to be applied generally throughout the City of Tigard; and therefore, the application is being processed as a Type IV procedure, Legislative Amendment, as governed by Section 18.390.060G.

Chapter 18.390: Decision-Making Procedures

Chapter 18.390.020. Description of Decision-Making Procedures

B.4. Type IV Procedure. Type IV procedures apply to legislative matters. Legislative matters involve the creation, revision, or large-scale implementation of public policy. Type IV matters are considered initially by the Planning Commission with final decisions made by the City Council.

Findings: The amendment to the Tigard Comprehensive Plan establishes policies to be applied generally throughout the City of Tigard. Therefore was reviewed under the Type IV procedure as detailed in Section 18.390.060.G. In accordance with this section, the amendment was initially considered by the Planning Commission with City Council making the final decision.

Chapter 18.390.060.G. Decision-making considerations. The recommendation by the Commission and the decision by the Council shall be based on consideration of the following factors:

- 1. The Statewide Planning Goals and Guidelines adopted under Oregon Revised Statutes Chapter 197;**
- 2. Any federal or state statutes or regulations found applicable;**
- 3. Any applicable Metro regulations;**
- 4. Any applicable comprehensive plan policies; and**
- 5. Any applicable provisions of the City’s implementing ordinances.**

Findings: The Commission reviewed applicable Statewide Planning Goals, Metro Urban Growth Management Functional Plan, Oregon Administrative Rule 660, Division 9, the Tigard Community Development Code, and the Tigard Comprehensive Plan. As indicated pursuant to the Commission’s findings and conclusions found within this staff report the amendment is consistent with this criterion.

CONCLUSION: Based on the analysis above, the Commission finds that the proposed amendment satisfies the applicable review criteria within the Tigard Community Development Code.

CITY OF TIGARD COMPREHENSIVE PLAN POLICIES:

General Findings

Finding: The City’s Comprehensive Plan was adopted by the Tigard City Council in 1983, and acknowledged as being in conformance with the Statewide Planning Goals by the Land Conservation and Development Department (LCDC) on October 11, 1984. LCDC re-acknowledged the plan’s compliance with the statewide planning goals through the Periodic Review process.

Finding: The Commission finds that the following Comprehensive Plan goals and policies apply to the amendment and the amendment satisfies the applicable goals and policies for the reasons stated below. During the course of public hearings, the Community Development Department and the Planning Commission provided all interested parties opportunities to identify, either orally or in writing, any other Comprehensive Plan goals or policies that might apply to the amendment. No additional provisions were identified.

Chapter 1: Citizen Involvement

Goal 1.1 Provide citizens, affected agencies, and other jurisdictions the opportunity to participate in all phases of the planning process.

Policy 2. The City shall define and publicize an appropriate role for citizens in each phase of the land use planning process.

Findings: The proposal has complied with all notification requirements pursuant to Chapter 18.390.060 of the Tigard Community Development Code. This staff report was also available seven days in advance of the hearing pursuant to Chapter 18.390.070.E.b of the Tigard Community Development Code.

Information was distributed throughout the process via Cityscape articles and public meetings with the Tigard Planning Commission acting as the advisory committee. Involvement opportunities included a series of seven public meetings held by the advisory committee and submitting written or oral comments at the meetings. Outreach methods also included updates to City boards and commissions.

As part of the Comprehensive Plan Amendment process, public notice of the Planning Commission and City Council public hearings was sent to the interested party list and published in the March 17, 2011 issue of The Times. The notice invited public input and included the phone number of a contact person to answer questions. The notice also included the address of the City's webpage where the entire draft of the proposed amendment could be viewed.

Policy 3. The City shall establish special citizen advisory boards and committees to provide input to the City Council, Planning Commission, and City staff.

Findings: The Tigard Planning Commission acted as the advisory committee for the Tigard 2011 Economic Opportunities Analysis. The advisory committee helped guide the completion of the project by reviewing work products and providing advice and feedback to ensure the community's needs and aspirations were being captured in the update. The committee met seven times in public settings from July 2010 to March 2011.

Policy 5. The opportunities for citizen involvement provided by the City shall be appropriate to the scale of the planning effort and shall involve a broad cross-section of the community.

Findings: As outlined above, the community was given multiple venues to get information and get involved. This included a number of articles in the Cityscape newsletter that is delivered to every household in Tigard. Staff also made a good faith effort to ensure a diversity of representation on the advisory committee and the opportunity for citizen input at the advisory committee meetings.

Goal 1.2 Ensure all citizens have access to:

- A. opportunities to communicate directly to the City; and**
- B. information on issues in an understandable form.**

Policy 1. The City shall ensure pertinent information is readily accessible to the community and presented in such a manner that even technical information is easy to understand.

Findings: Information regarding the topics included in this Comprehensive Plan Amendment was available in multiple locations in an understandable format for the duration of the process. This included paper and electronic copies that were available in the permit center and also on the website.

Policy 2. The City shall utilize such communication methods as mailings, posters, newsletters, the internet, and any other available media to promote citizen involvement and continue to evaluate the effectiveness of methods used.

Findings: Information was distributed throughout the process via the City's website, Cityscape articles, and a series of seven public meetings held by the advisory committee. Outreach methods also included updates to City boards and commissions.

Policy 5. The City shall seek citizen participation and input through collaboration with community organizations, interest groups, and individuals in addition to City sponsored boards and committees.

Findings: Outreach methods included updates to City boards and commissions and a survey of community organizations, interest groups, and individuals with economic development backgrounds. The survey results can be found in Appendix I of the EOA.

Chapter 2: Land Use Planning

Goal 2.1 Maintain an up-to-date Comprehensive Plan, implementing regulations and action plans as the legislative basis of Tigard's land use planning program.

Policy 1: The City's land use program shall establish a clear policy direction, comply with state and regional requirements, and serve its citizens' own interests.

Findings: The amendment refines the general policy direction related to Tigard Comprehensive Plan Goal 9: Economic Development for the community. The policy statements are clear and serve the interests of the citizens. The development of the Tigard 2011 Economic Opportunities Analysis was required as a component of State Periodic Review and complies with Oregon Administrative Rule 660, Division 9, which governs the development of these studies in the state.

Policy 2: The City's land use regulations, related plans, and implementing actions shall be consistent with and implement its Comprehensive Plan.

Findings: The amendment refines the general policy direction related to Tigard Comprehensive Plan Goal 9: Economic Development for the community. The Tigard 2011 Economic Opportunities Analysis compares projected demand to current supply of vacant employment and industrial lands to ensure the City's policies and implementing actions are sufficient to preserve the needed 20-year supply of these vacant lands. The development of the Tigard 2011 EOA used current Tigard Comprehensive Plan policies and land use designations as part of the analysis of future vacant land needs as required by state law. The amendment is consistent with this policy.

Policy 3. The City shall coordinate the adoption, amendment, and implementation of its land use program with other potentially affected jurisdictions and agencies.

Findings: The City sent out request for comments on the proposed amendment to all potentially affected jurisdictions and agencies. All were given 14 days to respond. Any comments that were received are addressed in Section VII: Outside Agency Comments of this Staff Report. Additionally, Metro and the Department of Land Conservation and Development staff provided input throughout the development of the Tigard 2011 EOA.

Policy 5. The City shall promote intense urban level development in Metro-designated Centers and Corridors, and employment and industrial areas.

Findings: The Tigard 2011 EOA identified and acknowledged the City's desire for, and the potential for redevelopment of these areas. Assumptions made about redevelopment and refill potential were based on City policy and Metro guidance to determine the amount of vacant employment and industrial lands needed for the next 20-years. The amendment is consistent with the policy.

Policy 20. The City shall periodically review and if necessary update its Comprehensive Plan and regulatory maps and implementing measures to ensure they are current and responsive to community needs, provide reliable information, and conform to applicable state law, administrative rules, and regional requirements.

Findings: The amendment is an update to Goal 9 of the Tigard Comprehensive Plan as required by State Periodic Review. The amendment adopts the Tigard 2011 EOA, which used the most reliable, up-to-date information to determine the 20-year vacant employment and industrial land needs. The Tigard 2011 EOA ensures compliance with Oregon Administrative Rule 660-009, which governs economic development planning in the state and requires this analysis. Findings of conformance to applicable state and regional requirements can be found in Section V of this Staff Report.

Chapter 5: Natural Resources and Historic Areas

Goal 5.1 Protect natural resources and the environmental and ecological functions they provide and, to the extent feasible, restore natural resources to create naturally functioning systems and high levels of biodiversity.

Findings: As discussed in the findings made for Statewide Planning Goal 5, the amendment does not alter the City's acknowledged Goal 5 inventories or land use programs. No changes will occur to current Natural Resource protections as the result of adopting the Tigard 2011 EOA. The amendment does not conflict with goals and policies of this chapter of the Tigard Comprehensive Plan.

Chapter 6: Environmental Quality

Goal 6.1 Reduce air pollution and improve air quality in the community and region.

Policy 3: The City shall promote land use patterns, which reduce dependency on the automobile, are compatible with existing neighborhoods, and increase opportunities for walking, biking, and /or public transit.

Findings: The amendment is consistent with this policy as the Tigard 2011 EOA identifies the redevelopment of centers and corridors as an important economic development activity to ensure a 20-year supply of vacant employment and industrial lands. This redevelopment will result in more intense urban land uses that reduce the dependency on the automobile and increase opportunities for walking, biking, and public transit. The Tigard 2011 EOA analysis shows no rezoning of property is needed under the land efficient need scenario, thus avoiding potential conflict with existing neighborhoods.

Chapter 7: Hazards

Goal 7.2 Protect people and property from flood, landslide, earthquake, wildfire, and severe weather hazards.

Findings: The adoption of the Tigard 2011 EOA has no impact on City policies or programs related to hazards. The development of the Tigard 2011 EOA used the City's buildable lands inventory to identify vacant employment and industrial lands. The buildable lands inventory excludes sensitive lands, including the 100-year floodplain. The amendment is consistent with the policy.

Chapter 8: Parks, Recreation, Trails, and Open Space

Findings: The adoption of the Tigard 2011 EOA has no impact on City policies or programs related to parks, recreation, trails, or open space. However, Goal 9 acknowledges the benefits of these community amenities in attracting economic development. The amendment is consistent with this policy.

Chapter 9: Economic Development

Goal 9.1 Develop and maintain a strong, diversified, and sustainable local economy.

Findings: The City is under State Periodic Review and required to complete an economic opportunities analysis. The development of the Tigard 2011 EOA complies with OAR 660, Division 9. It also used existing Tigard Comprehensive Plan policies, which were revised and adopted on March 6, 2008, as guidance during the process to complete the EOA. The amendment adopts the Tigard 2011 EOA, which compared the 20-year projected demand for employment and industrial land to the existing supply. The EOA found that the land efficient need scenario would provide the necessary 20-year supply of vacant employment and industrial lands. An adequate supply of land will support the development of the local economy. The EOA also recommended the addition of a policy to update the buildable land supply to monitor short and long-term supply as required by Statewide Planning Goal 9.

Goal 9.2 Make Tigard a center and incubator for innovative businesses, including those that focus on environmental sustainability.

Findings: The amendment adopts the Tigard 2011 EOA, which compared the 20-year projected demand for employment and industrial land to the existing supply. The EOA found that the land efficient need scenario would provide the necessary 20-year supply of vacant employment and

industrial lands. An adequate supply of land supports this goal. The EOA also recommended the addition of a policy to encourage businesses that are economically and environmentally sustainable, which supports this goal.

Goal 9.3 Make Tigard a prosperous and desirable place to live and do business.

Findings: The amendment adopts the Tigard 2011 EOA, which compared the 20-year projected demand for employment and industrial land to the existing supply. The EOA found that the land efficient need scenario would provide the necessary 20-year supply of vacant employment and industrial lands. An adequate supply of land supports this goal. The EOA also recommended the addition of a policy to encourage neighborhood commercial uses for economic opportunity, efficient land use patterns, multi-modal transportation and neighborhood vitality, which supports this goal.

Chapter 10: Housing

Goal 10.1 Provide opportunities for a variety of housing types to meet the diverse housing needs of current and future City residents.

Policy 2: The City's land use program shall be consistent with applicable state and federal laws.

Findings: The amendment establishes the general policy direction related to Tigard Comprehensive Plan Goal 9: Economic Development for the community. The development of the Tigard 2011 Economic Opportunities Analysis was completed as a requirement of State Periodic Review and complies with Oregon Administrative Rule 660, Division 9, which governs the development of these studies in the state.

Policy 5: The City shall provide for high and medium density housing in the areas such as town centers (Downtown), regional centers (Washington Square), and along transit corridors where employment opportunities, commercial services, transit, and other public services necessary to support higher population densities are either present or planned for in the future.

Findings: The amendment is consistent with this policy as the Tigard 2011 EOA identifies the redevelopment of centers and corridors, for housing and employment, as an important economic development activity to ensure a 20-year supply of vacant employment and industrial lands. This redevelopment will result in more intense urban land uses that reduce the dependency on the automobile and increase opportunities for walking, biking, and public transit. The Tigard 2011 EOA analysis shows no rezoning of property is needed to accomplish this policy.

Chapter 11: Public Facilities and Services

Goal 11.2 Secure a reliable, high quality, water supply to meet the existing and future needs of the community.

Findings: The amendment adopts the Tigard 2011 EOA, which compared the 20-year projected demand for employment and industrial land to the existing supply. The EOA found that the land efficient need scenario would provide the necessary 20-year supply of vacant employment and

industrial lands. The EOA also analyzed the capacity of the water supply and determined it was sufficient to accommodate short-term land needs and 20-year projected employment growth as required by Statewide Planning Goal 9.

Goal 11.3 Develop and maintain a wastewater collection system that meets the existing and future needs of the community.

Findings: The amendment adopts the Tigard 2011 EOA, which compared the 20-year projected demand for employment and industrial land to the existing supply. The EOA found that the land efficient need scenario would provide the necessary 20-year supply of vacant employment and industrial lands. The EOA also analyzed the capacity of the wastewater system and determined it was sufficient to accommodate short-term land needs and 20-year projected employment growth as required by Statewide Planning Goal 9.

Chapter 12: Transportation

Goal 12.1 Develop mutually supportive land use and transportation plans to enhance the livability of the community.

Goal 12.2 Develop and maintain a transportation system for the efficient movement of people and goods.

Goal 12.3 Provide and accessible, multi-modal transportation system that meets the mobility needs of the community.

Findings: The amendment is consistent with these goals as the Tigard 2011 EOA identifies the redevelopment of centers and corridors, for housing and employment, as an important economic development activity to ensure a 20-year supply of vacant employment and industrial lands. This redevelopment will result in more intense urban land uses that reduce the dependency on the automobile and increase opportunities for walking, biking, and public transit.

Chapter 13: Energy Conservation

Goal 13.1 Reduce energy consumption.

Policy 1: The City shall promote the reduction of energy consumption associated with vehicle miles traveled through:

- A. land use patterns that reduce dependency on the automobile;**
- B. public transit that is reliable, connected, and efficient; and**
- C. bicycle and pedestrian infrastructure that is safe and well connected.**

Findings: The amendment is consistent with this policy as the Tigard 2011 EOA identifies the redevelopment of centers and corridors, for housing and employment, as an important economic development activity to ensure a 20-year supply of vacant employment and industrial lands. This redevelopment will result in more intense urban land uses that reduce the dependency on the automobile and increase opportunities for walking, biking, and public transit.

Chapter 14: Urbanization

Goal 14.1 Provide and/or coordinate the full range of urban level services to lands and citizens within the Tigard City Limits.

Policy 6: The City shall, as needed, coordinate and/or participate in planning activities or development decisions within the Tigard Urban Services Area.

Findings: The amendment adopts the Tigard 2011 EOA, which compared the 20-year projected demand for employment and industrial land to the existing supply. The EOA found that the land efficient need scenario would provide the necessary 20-year supply of vacant employment and industrial lands within the Tigard Urban Planning Area, which is coincident with the Tigard Urban Services Area.

Goal 14.2 Promote Tigard citizens' interests in urban growth boundary expansion and other regional and state growth management decisions.

Policy 6: The City shall maintain the low-density residential character of its existing single family residential neighborhoods and accommodate more intense urban land uses in its regional and town centers and within major transportation corridors to be consistent with Statewide Planning Goals and the Metro Framework Plan.

Findings: The amendment is consistent with this policy as the Tigard 2011 EOA identifies the redevelopment of centers and corridors, for housing and employment, as an important economic development activity to ensure a 20-year supply of vacant employment and industrial lands without the need for any rezoning at this time. This redevelopment will help maintain the low-density residential character of single family neighborhoods.

Special Planning Area: Downtown

Goal 15.1 The City will promote the creation of a vibrant and active urban village at the heart of the community that is pedestrian oriented, accessible by many modes of transportation, recognizes natural resources as an asset, and features a combination of uses that enables people to live, work, play, and shop in an environment that is uniquely Tigard.

Findings: The amendment is consistent with this goal as the Tigard 2011 EOA identifies the redevelopment of centers (including Downtown) and corridors, for housing and employment, as an important economic development activity to ensure a 20-year supply of vacant employment and industrial lands. This redevelopment will result in more intense urban land uses that reduce the dependency on the automobile and increase opportunities for walking, biking, and public transit.

CONCLUSION: Based on the analysis above, the Commission finds that the proposed amendment satisfies the applicable goals and policies contained in the City of Tigard Comprehensive Plan.

METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN TITLE 4

Findings: The Regional Framework Plan calls for a strong regional economy. To improve the economy, Title 4 seeks to provide and protect a supply of sites for employment by limiting the

types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs), Industrial and Employment Areas. Title 4 also seeks to provide the benefits of "clustering" to those industries that operate more productively and efficiently in proximity to one another than in dispersed locations. Title 4 further seeks to protect the capacity and efficiency of the region's transportation system for the movement of goods and services and to encourage the location of other types of employment in Centers, Corridors, Main Streets and Station Communities.

Metro staff has confirmed that the City of Tigard is in compliance with Title 4. The development of the Tigard 2011 Economic Opportunities Analysis involved discussions with Metro staff and Oregon Department of Land Conservation and Development staff. They were provided the opportunity to review and comment on all work leading up to the document proposed for adoption. The purpose of the collaboration was to ensure consistency and compliance with state and regional requirements.

This amendment (CPA2011-00002) adopts the Tigard 2011 Economic Opportunities Analysis, which was completed following the rules outlined in OAR 660, Division 9. The amendment sets policy related to a 20-year supply of land and does not affect compliance with Title 4. The amendment is consistent Title 4.

CONCLUSION: Based on the analysis above, the Commission finds that the proposed amendment is consistent with the Metro Urban Growth Management Functional Plan Title 4.

OREGON ADMINISTRATIVE RULE 660, DIVISION 9

Findings: The Land Conservation and Development Commission adopted Oregon Administrative Rule 660, Division 9 to implement Statewide Planning Goal 9 and "to provide an adequate land supply for economic development and employment growth in Oregon." The City of Tigard is currently in State Periodic Review, and Section 10 requires the review and amendment of comprehensive plans and land use regulations during periodic review. The City was required to complete an economic opportunities analysis as part of its periodic review work program to ensure compliance with this rule.

The development of the Tigard 2011 Economic Opportunities Analysis complied with the rules outlined in Section 30, which requires multi-jurisdiction coordination. This was accomplished through collaboration with the Oregon Department of Land Conservation and Development and Metro, to ensure consistency with policies and regulations associated with Division 9 and the Metro Urban Growth Management Functional Plan Title 4. Both organizations were given the opportunity to review work products throughout the process. They were also afforded the opportunity for a final review with other affected jurisdictions/organizations.

In addition, the Tigard 2011 EOA followed the rules set forth in Sections 15, 20, and 25. Section 15 outlines the necessary elements of an economic opportunities analysis. The Tigard 2011 EOA contains all necessary elements. Section 20 outlines the required and recommended policies to address in the comprehensive plan. The Tigard Comprehensive Plan, the Tigard 2011 EOA and associated amendments comply with Section 20. Section 25 requires measures adequate to implement policies. The Tigard 2011 EOA addressed all necessary elements of Section 25 and is in compliance with Division 9.

CONCLUSION: Based on the analysis above, the Commission finds that the proposed amendment satisfies the requirements of Oregon Administrative Rule 660, Division 9.

THE STATEWIDE PLANNING GOALS AND GUIDELINES ADOPTED UNDER OREGON REVISED STATUTES CHAPTER 197

Statewide Planning Goal 1 – Citizen Involvement:

This goal outlines the citizen involvement requirement for adoption of Comprehensive Plans and changes to the Comprehensive Plan and implementing documents.

Findings: This goal was met through an extensive public involvement process. Information was distributed throughout the process via the City’s website, Cityscape articles, and a series of seven public meetings with the Tigard Planning Commission, who acted as the advisory committee. Outreach methods also included updates to City boards and commissions.

As part of the Comprehensive Plan Amendment process, public notice of the Planning Commission and City Council public hearings was sent to the interested parties list and published in the March 17, 2011 issue of The Times (in accordance with Tigard Development Code Chapter 18.390). The notice invited public input and included the phone number of a contact person to answer questions. The notice also included the address of the City’s webpage where the entire draft of the text changes could be viewed.

Statewide Planning Goal 2 – Land Use Planning:

This goal outlines the land use planning process and policy framework. The Comprehensive Plan was acknowledged by DLCD as being consistent with the statewide planning goals.

Findings: The amendment to the Tigard Comprehensive Plan is being undertaken to update the City’s acknowledged Comprehensive Plan in a manner consistent with current conditions and citizen values. The amendment to the Tigard Comprehensive Plan is being processed as a Type IV procedure, which requires any applicable statewide planning goals, federal or state statutes or regulations, Metro regulations, comprehensive plan policies, and City’s implementing ordinances, be addressed as part of the decision-making process. The amendment is included as a periodic review work program task. The City of Tigard was notified of commencement of periodic review in May 2008 and had its work program approved in April 2010. All noticing requirements have been met. All applicable review criteria have been addressed within this staff report; therefore, the requirements of Goal 2 have been met.

Statewide Planning Goal 5 – Natural Resources

This goal requires the inventory and protection of natural resources, open spaces, historic areas and sites.

Findings: The City is currently in compliance with the State’s Goal 5 program and Metro’s Title 13: Nature in Neighborhoods program, which implements Goal 5. The amendment does not alter the City’s acknowledged Goal 5 inventories or land use programs. No changes will occur to current natural resource protections. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 5 process requirements.

Statewide Planning Goal 6: Air, Water, and Land Resources Quality

To maintain and improve the quality of the air, water, and land resources of the state.

Findings: The City is currently in compliance with Metro's Title 3: Water Quality and Flood Management program, which implements Goal 6. The amendment does not alter the City's acknowledged land use programs regarding water quality and flood management protections. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 6.

Statewide Planning Goal 7 – Areas Subject to Natural Hazards

To protect people and property from natural hazards.

Findings: The City is currently in compliance with Metro's Title 3: Water Quality and Flood Management program, which implements Goal 7. The amendment does not alter the City's acknowledged land use programs regarding water quality and flood management protections. The City is currently a participant in the National Flood Insurance Program administered by the Federal Emergency Management Agency. The amendment does not alter the City's participation. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 7.

Statewide Planning Goal 8 – Recreational Needs

This goal requires the satisfaction of the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Findings: The City is currently in compliance with Statewide Planning Goal 8. The amendment does not alter the City's acknowledged Goal 8 policies or land use programs. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 8.

Statewide Planning Goal 9: Economic Development

To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

Findings: The City is currently in compliance with Goal 9 and Metro's Title 4: Industrial and Other Employment Areas through its acknowledged Comprehensive Plan. This amendment is required as part of State Periodic Review and OAR 660, Division 9. The amendment adopts the Tigard 2011 EOA, which was completed following the rules outlined in Division 9 and compares projected demand to current supply of vacant employment and industrial lands to ensure the City's policies and implementing actions are sufficient to preserve the needed 20-year supply of these vacant lands. The Department of Land Conservation and Development, who administers Division 9, was consulted throughout the process and were requested to submit comments. Any comments can be found in the Outside Agency Comments section. The adoption of the Tigard 2011 EOA and the amendment to the Tigard Comprehensive Plan maintains the City's compliance with Goal 9.

Statewide Planning Goal 10: Housing

To provide adequate housing for the needs of the community, region and state.

Findings: The City is currently in compliance with Goal 10 and the Metropolitan Housing Rule (OAR 660-007/Division 7), and Metro's Title 1: Requirements for Housing and Employment Accommodation, and Title 7: Affordable Housing. The adoption of the Tigard 2011 EOA does not alter the City's compliance with Goal 10. The amendment compares projected demand to current supply of vacant employment and industrial lands to ensure the City's policies and

implementing actions are sufficient to preserve the needed 20-year supply of these vacant lands. The amendment to the Comprehensive Plan is in compliance with Goal 10.

Statewide Planning Goal 11: Public Facilities and Services

To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Findings: The City is currently in compliance with Goal 11 through its acknowledged Comprehensive Plan. This includes an adopted Public Facility Plan as required by Oregon Revised Statute 197.712 and Oregon Administrative Rule 660-011. The amendment does not alter the City's acknowledged Goal 11 policies or plans. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 11.

Statewide Planning Goal 12: Transportation

To provide and encourage a safe, convenient, and economic transportation system.

Findings: The City is currently in compliance with Goal 12 and Metro's Regional Transportation Plan through its acknowledged Comprehensive Plan and Transportation System Plan as required by Oregon Administrative Rule 660-012 (Transportation Planning Rule). The amendment adopts the Tigard 2011 EOA and does not alter Goal 12 plans or policies. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 12.

Statewide Planning Goal 13: Energy Conservation

Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based on sound economic principles.

Findings: The City is currently in compliance with Goal 13 through its acknowledged Comprehensive Plan. The adoption of the Tigard 2011 EOA does not alter the City's compliance with Goal 13. As a result, the amendment to the Tigard Comprehensive Plan is in compliance with Goal 13.

Statewide Planning Goal 14: Urbanization

To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Findings: The City is currently in compliance with Goal 14 and Metro's Title 11: Planning for New Urban Areas through its acknowledged Comprehensive Plan and land use regulations. The City also has a signed Urban Planning Area Agreement and Urban Services Agreement as required by ORS 195.065 and ORS 197. This amendment is required as part of State Periodic Review and OAR 660, Division 9. The amendment adopts the Tigard 2011 EOA, which was completed following the rules outlined in Division 9 and compares projected demand to current supply of vacant employment and industrial lands to ensure the City's policies and implementing actions are sufficient to preserve the needed 20-year supply of these vacant lands. The adoption of the Tigard 2011 EOA does not alter the City's compliance with Goal 14. The amendment is consistent with this goal.

CONCLUSION: Based on the analysis above, the Commission finds that the proposed amendment is consistent with the applicable Statewide Planning Goals.

SECTION VI. ADDITIONAL CITY STAFF COMMENTS

The City of Tigard's Current Planning Division, Administrative Department, Public Works Department, and Police Department has had an opportunity to review this proposal and have no objections.

CONCLUSION: Based on no comment from City staff, staff finds the proposed amendment does not interfere with the best interests of the City.

SECTION VII. OUTSIDE AGENCY COMMENTS

The following agencies/jurisdictions had an opportunity to review this proposal and did not respond:

**City of Beaverton
City of Durham
City of King City
City of Lake Oswego
City of Portland
City of Tualatin
Clean Water Services
Metro Land Use and Planning
Oregon Department of Land Conservation and Development
Oregon Department of Transportation, Region 1
Oregon Department of Transportation, Region 1, District 2A
Tualatin Hill Parks and Recreation District
Tualatin Valley Fire & Rescue
Washington County, Department of Land Use and Transportation**

Tualatin Valley Water District had an opportunity to review this proposal and has no objections.

CONCLUSION: Based on responses from outside agencies listed above, the Commission finds the proposed amendment meets all requirements of these agencies and is consistent with the best interests of the City.

SECTION VIII. CONCLUSION

The proposed changes comply with the applicable Statewide Planning Goals, applicable regional, state and federal regulations, the Tigard Comprehensive Plan, and applicable provisions of the City's implementing ordinances.

Therefore, Staff recommends that the Planning Commission recommend approval of the Comprehensive Plan Amendment to the Tigard City Council as determined through the public hearing process.

ATTACHMENT:

EXHIBIT A: PROPOSED AMENDMENT TO THE TIGARD COMPREHENSIVE PLAN.



PREPARED BY: Darren Wyss
Senior Planner

March 28, 2011
DATE



APPROVED BY: Ron Bunch
Community Development Director

March 28, 2011
DATE