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MEMORANDUM

Date: April 1, 2008
To: Portland City Planning Commission
State Periodic Review Assistance Team
From: Al Burns, AICP, Senior City Planner
Subject: Draft Periodic Review Assessment

Requested Action

The City Planning Commission is scheduled for a public hearing on a draft Periodic Review assessment on April 22, 2008. The Bureau of Planning will request the Planning Commission to consider public testimony, advise the bureau on how to revise the assessment, and share its initial impressions on what work tasks might be necessary to bring Portland's Comprehensive Plan into compliance with state planning law.

Introduction

On November 13, 2007, Portland entered its second "Periodic Review." Periodic Reviews are mandated updates of state-approved comprehensive plans. Portland received state approval of its plan in May 1981, and its first Periodic Review ended in January 2000. Further reviews are required every five to seven years and must be completed within three years of initiation.

This memorandum employs the term "comprehensive plan" broadly to include the plan proper, plan supporting documents, and plan implementing measures. The actual contents of Portland's Comprehensive Plan are limited to goal, policy and objective statements; maps; and project lists. Examples of plan supporting documents include population and employment forecasts, natural resource inventories, and public facilities plans. These documents contain the assumptions, facts and reasons supporting the decisions described in the plan. Implementing measures carry out decisions described in the plan. Examples of implementing measures include our zoning map and code, urban renewal programs, and housing tax abatement programs. All of these are subject to periodic review.

There are two phases in periodic review. Phase one involves a self-assessment to identify needed work, and the compilation of tasks within a work-program. Phase two is the incremental completion of tasks on the work program. The Portland City Council is required to either adopt a periodic review work program, or justify a decision that no work program is necessary. If work proves necessary, the City Council's adopted program will be forwarded to the director of the Oregon Department of Land Conservation and Development for approval. A decision by the director to not approve a Portland work plan may be appealed to Oregon Land Conservation and Development Commission. If the director approves the work program, there is no opportunity to appeal. Should Portland receive approval of a work program, the city will have until November 13, 2010 to finish the listed tasks.

The Planning Commission's Role

Before the City Council makes its final decision, the Planning Commission must hold at least two hearings. At the Planning Commission's second hearing interested persons will have an opportunity to propose the addition, deletion or modification of tasks comprising a draft work program. After this second hearing, or a subsequent meeting that need not include a hearing, the Planning Commission should make a recommendation to City Council on the adequacy of the assessment, and as necessary, a list of tasks to align Portland's plan with state requirements.

During the second phase of periodic review, the Planning Commission also holds hearings and makes recommendations to City Council as work tasks near completion.

The Broader Context

It will be important to keep in mind that Periodic Review is limited to required updates. The city is also initiating a larger update to its Comprehensive Plan responding to community values expressed in the VisionPDX project. This effort will certainly include many beneficial changes not required by state planning law. An evaluation of the city's entire Comprehensive Plan will also be presented during the April 22, 2008 Planning Commission hearing. To help avoid confusion between these similar efforts this periodic review memorandum employs the term "assessment," while the broader work is the subject of an "evaluation."

For city planning purposes it makes sense to merge the "required" and the "beneficial-but-not-required" elements into a single scope of work; but our state partners have requested maintenance of a separate periodic review work program. As the city learns more by scoping the larger project, the Planning Commission may wish to modify some of the required tasks on our approved Periodic Review work program, and our state partners have assured the city that any such modification would be favorably considered.

There is also a great deal of overlap between beneficial work and the most likely category of required work – the update of the facts and assumptions upon which the city's Comprehensive Plan is based. It is reasonable to expect beneficial changes to be proposed during the public hearing reserved for required changes. These comments will not be lost. They will be preserved and included in the public record for the larger project.

The State Requirements

The mandated assessment method involves the application of Periodic Review "need" factors to certain, but not all, plan elements.

The Factors. There are four factors that indicate the need for Periodic Review.

1. Changed Circumstances

A substantial change in circumstance indicates a need for Periodic Review. These changes include the factual base, assumptions, reasons, and conditions that support a plan or implementing measure. This information is usually found in a background document rather than the plan itself. Changes become "substantial" when they can no longer support a conclusion that a requirement of state planning law is met.

2. Inconsistencies between Plans and Decisions

It is possible that while the text of plans or implementing measures continue to comply with state planning law, decisions carrying them out may not. A pattern of land use decisions at variance with state planning law may indicate a need for Periodic Review.

3. Need to Coordinate

The municipal boundaries of the City of Portland contain land in three counties, while Portland surrounds one city and adjoins several others. All these local governments have plans. Metro, our regional government, and state agencies have plans too. It is possible for all these plans to comply with state planning law, but not be coordinated with one another. Part of Periodic Review is giving other governments information about Portland's plan; and providing them opportunities to identify coordination needs.

4. New Mandates

When plans continue to be well founded, implemented, and coordinated and still not achieving some of the purposes of state planning law; the usual reason is the state law has changed. Part of Periodic Review is comparing new mandates to existing plans. New mandates are usually found in the Oregon Revised Statutes (usually in Chapter 197 but occasionally in other chapters as well), amendments to existing Statewide Planning Goals, and in administrative rules carrying out these goals (OAR Chapter 660).

The Elements. There are five plan elements subject to assessment. In its earlier form, Periodic Review addressed the subject matter of all 19 Statewide Planning Goals, but the Oregon Legislature has limited the scope of current reviews to just five topics.

1. Economy

The state requirements are in Statewide Planning Goal 9 and Oregon Administrative Rules, Chapter 660, Division 9. The companion Portland Comprehensive Plan provision is Goal 5.

2. Housing

The state requirements are in Oregon Revised Statutes Chapter 197, Sections 295 through 314 "Needed Housing in Urban Growth Areas," Statewide Planning Goal 10, and Oregon Administrative Rules, Chapter 660, Division 7. The companion Portland Comprehensive Plan provision is Goal 4.

3. Public Facilities

The state requirements are in Statewide Planning Goal 11 and Oregon Administrative Rules, Chapter 660, Division 11. The companion Portland Comprehensive Plan provision is Goal 11.

4. Transportation

The state requirements are in Statewide Planning Goal 12 and Oregon Administrative Rules, Chapter 660, Division 12, with a special rule for Airport Planning at Division 13 which carries out Oregon Revised Statutes, Chapter 636, Sections 600 through 630. The companion Portland Comprehensive Plan provision is Goal 6.

5. Urbanization

The state requirements are in Statewide Planning Goal 14 and Oregon Administrative Rules, Chapter 660, Division 24. The companion Portland Comprehensive Plan provision is the Comprehensive Plan Map. Other urbanization provisions are divided among Comprehensive Plan Goals 1, 2, 3 and 12.

Starting the Assessment

It is important to remember that a Periodic Review assessment is supposed to be based on the information on hand. A city is not supposed to do new research or fact finding at this stage. Discovering the city only has outdated information indicates a need for Periodic Review. Getting better, more current or more forward-looking information would then be included as a second phase Periodic Review work task.

It is tempting at first to try plot the four need factors on one axis of a chart and the five subject matter elements on another to construct a twenty-cell assessment matrix. This really does not work, because a plan update is often compelled by more than one need factor. An example would be the construction of a better natural resource inventory. This work could be identified as “needed” either by mandate or coordination factors, and by either regional Metro Functional Plan requirements or by state goals requiring current inventories of housing and employment land. Since the same work can be indicated by five or six different reasons; this report focuses on likely work rather than the underlying reasons.

That said; the Planning Bureau suspects most of the required work will be indicated by the first need factor, “Changed Circumstances,” and some from the last, “New Mandates.” As the city acquires more forward looking information in the second phase of Periodic Review, this information will compel further examination of existing plan provisions and implementing measures, but will not necessarily require changes.

Again, it is important to remember that Periodic Review is for required changes; but Portlanders would not be well served by a plan that just met minimum state and regional requirements. When the Periodic Review assessment is completed the city may discover that state will require changes to a few things that the city had not considered, but the community’s desire for a better plan may go far beyond what the state requires.

The rest of this memorandum addresses some preliminary matters and each of the five plan elements subject to Periodic Review.

Preliminary Matters

Although only Statewide Planning Goals 9 Economic Development, Goal 10 Housing, Goal 11 Public Facilities, Goal 12 Transportation, and Goal 14 Urbanization are the subject matter for Periodic Review, the city cannot address these goals without also meeting Statewide Planning Goal 1 Citizen Involvement, and Goal 2 Planning. The city cannot also perform the analyses required by Statewide Planning Goal 9 Economic Development, and Goal 10 Housing without revisiting some requirements of Statewide Planning Goal 5 Natural Resources, and Statewide Planning Goal 7 Hazards.

Portland is required to use its existing state-approved citizen involvement program when beginning Periodic Review. This program is Goal 9 of our Comprehensive Plan. City Goal 9 is carried out, in part, by the “Legislative Procedures” chapter of our zoning code. Part of Periodic Review is an assessment of these state-approved citizen involvement

procedures. Based on this assessment, the city may choose to enhance its citizen involvement program as an early, second phase, work program task.

In quick summary, the existing citizen involvement program incorporates state public record and open meeting requirements, provides minimum 30-day notice of public hearings, and minimum 10-day availability of documents before a hearing. This 10-day period falls short of a 21-day requirement for some stages described in the state Periodic Review rule.

There are newer and better public involvement tools that have been developed as part of Bureau Innovation Project 1 "VisionPDX," Bureau Innovation Project 8 "Community Connect," and Bureau Innovation Project 9 "Public Involvement Toolkit."

The city must also reconstruct its city "buildable lands inventory" to meet the requirements of Statewide Planning Goal 9 Economic Development, and Statewide Planning Goal 10 Housing. Since this requirement cuts across several plan elements, and since it necessarily precedes other work, it is called out as a preliminary matter.

The buildable lands inventory can be understood by an analogy to a photographic positive and negative. The negative is a compiled inventory of restricted areas. Whatever is left unrestricted is the positive, our buildable lands inventory.

The following are the inventories that will need to be compile:

1. Submerged and submersible lands
2. Landslide areas
3. Earthquake areas
4. Floodways
5. FEMA Floodplains
6. Significant natural areas, including fish and wildlife habitats
7. Significant scenic areas
8. Significant public views
9. Significant cultural and archaeological areas
10. Historic Landmarks and districts
11. Contaminated areas
12. Designated wellhead protection areas
13. Designated open space
14. Conserved or protected Willamette River Greenway areas
15. Aircraft noise contours
16. Aircraft approach and departure cones
17. Existing rights-of-way
18. Areas identified as needed for right-of-way in master plans.

The Planning Bureau has also discussed the problem with Metro and DLCD that the term "buildable lands inventory" is misleading because it implies that land not included on the inventory is not buildable. This is not the case. Most land not included on buildable land inventories can be developed; but is subject to extra scrutiny at the time of development. There are, however, categories of land that do not allow buildings. To avoid this confusion our state and regional partners have suggested that this information be mapped in three parts: buildable, constrained, and un-buildable.

This map could either be a background document for the Comprehensive Plan, or part of the plan itself. The purpose of the "buildable" portion of the map is to demonstrate that a sufficient supply of housing and employment opportunities can be met on unconstrained lands.

Economic Development Element

The last major update of the Economic Development element of Portland's Comprehensive Plan was completed in September 1994. Periodic review will require revisiting background information on economic trends and opportunities; and a re-examination as to whether sufficient buildable land is available to accommodate different categories of expected and desired employment types. There are also new Goal 9 provisions regarding short-term land supply, prime industrial land, and brownfield redevelopment.

Metro conducts a population and employment forecast for the entire metropolitan region and apportions the forecast to each of the constituent jurisdictions with comprehensive planning responsibilities. Portland's responsibility is to demonstrate that it has sufficient quantities of vacant, re-developable, or underutilized commercial and industrial land in the right places, with supporting infrastructure, to accommodate a 20-year need identified by Metro. The city, at its discretion, may choose to accommodate a greater than 20-year need.

1. **Economic Opportunities Analysis.** The Planning Bureau anticipates preparation of an Economic Opportunities Analysis as part of the update of the Economic Development element of the Comprehensive Plan. A state grant is available to underwrite part of the cost of this analysis. The Economic Opportunities Analysis should be adopted by the Portland City Council as a Comprehensive Plan background document.
2. **Trends analysis.** The city does not have a current analysis describing international, national, state and local economic trends related to the types of business likely to locate or expand in Portland. Metro's current 2030 forecast is based on trends analysis, but a closer look at Portland trends and conditions could warrant forecast refinements
3. **Identification of Industrial Land Base.** Citywide industrial land analysis was completed in 2004 although not adopted, including inventories of buildable vacant land, various tiers of use constraints, brownfields, environmental constraints, and infrastructure deficiencies. Updates of those inventories should incorporate recent development and investments that have occurred in Portland. Short-term land supplies (e.g., 3, 5, or 8 years) have not been specifically inventoried. The city should consider the cumulative effects of rezoning and identify the amount of growth or shrinkage of the industrial land base since the completion of the last Periodic Review in 2000. The revised land base should be categorized as suitable for different employment types in the city's range of employment districts.
4. **Prime Industrial Land and Land Retention Measures.** New Goal 9 provisions on "prime" industrial land are applicable in Portland. There are lands that have marine, rail, air, or highway access and other supportive infrastructure that would be difficult or impossible to replace. Portland must also comply with provisions of Title 4 of Metro's Urban Growth Management Functional Plan that require more limits of the use of industrial lands by commercial activities than does Portland's industrial sanctuary regulations.

5. Other Employment Land. Portland must also assess the adequacy of its land base for non-industrial employment. Land supply and demand analysis should consider any need for expanding urban centers, commercially underserved neighborhoods, and institutional land needs (e.g., hospitals and universities).
6. Accommodation of Identified Employment Needs. Every five to seven years Metro adopts a regional 20-year population and employment forecast, and makes a growth management decision. This decision may direct growth within the existing urban growth boundary, to new urban areas requiring an expansion of the boundary, or to both types of areas. The Metro Council then allocates a share of expected growth to each city within the metropolitan region and to urban unincorporated areas in three counties. These allocations are recorded in Title 1, Table 1 of Metro's Urban Growth Management Functional Plan, which was last updated in December 2002. Portland should review its employment capacity to determine if this target can be met plus an increment expected to be allocated in 2009 or 2010. One of the difficult parts of Periodic Review will be starting without a new, regional, coordinated employment forecast. Portland planners will work with Metro staff to refine regional capacity estimates, which in turn, should influence the next regional growth management decision. The Portland Planning Bureau assumes that a demonstration that the city has capacity to either meet or exceed the expected employment allocation would satisfy state planning law; but a demonstration of insufficient capacity would not. This accommodation analysis is done for the city as a whole.
7. Policy and Map Adjustments. Depending on what the city learns from the above, the City Council may choose to adjust policies, maps, and codes that describe a desired distribution on employment opportunities throughout the city.
8. Economic Development Strategies. The Oregon Business Plan (2007) and Regional Business Plan (2006) focus on supporting traded sector clusters, some of which have a substantial presence in Portland. Portland's 2002 Economic Development Strategy recommends a range of actions that reinforce local competitiveness in these sectors. The Economic Development Strategy is expected to be updated concurrently with the Comprehensive Plan update, facilitating coordination of long-term policies and short-term priorities for economic development.

Housing Element

The Housing element of Portland's Comprehensive Plan was last revised in January of 1999. Periodic review requirements address the city's overall housing capacity, the variety of housing types allowed, and the provision of needed housing.

The update of the Housing Element will probably involve:

1. **Forecasted Housing Need.** As with employment, Metro will prepare a twenty-year population forecast for the entire Metropolitan Region. A regional housing need will be derived by dividing the forecast by an expected future household size; and a future housing need will be allocated to each city under Metro's jurisdiction, as well as to the unincorporated urban areas of the three metropolitan counties. This allocation will update or replace the Portland housing number in Title 1, Table 1 of Metro's Urban Growth Management Functional Plan.
2. **Calculation of Housing Capacity.** Portland is facing similar but different capacity requirements from Metro and the State. Metro will require that Portland have the capacity to at least meet its assigned 20-year allocation of additional housing. The state's "Metropolitan Housing Rule" requires that Portland accommodate (existing plus new) 10 units per acre on the residentially-zoned portion of its buildable lands inventory. During its first Periodic Review Portland fell slightly short of this number; but the rule has been subsequently amended to recognize that mixed-use zones provide housing capacity too. Portland has established minimum housing densities for all its residential zones; but not for residential projects allowed by right in commercial and employment zones. Minimum residential densities for mixed-use projects might be a periodic Review work task.
3. **Different Housing Types.** The state requires at least half of Portland's remaining housing capacity be designated for multi-dwelling and attached single dwelling use. Portland will have to perform a "needed housing" examination, profiling existing and expected residents and the amount of housing affordable for different brackets of household income. The state rules assume that denser housing is more affordable housing, but this is not necessarily the case in the center of a metropolitan region. The cost of land plus the costs of construction makes market-rate new housing unaffordable to many. Also, given the rise in transportation costs due increased fuel prices, the affordability of housing is affected by both housing costs and location. The city may choose to mitigate this situation by considering housing and transportation costs together, as measured from distance to job centers, when determining housing affordability and affordable housing locations. A possible work task might be the establishment of patterns of housing and transportation that provide for more affordable living.
4. **Conservation of Housing.** Portland has an existing policy and code that preserves the housing potential of the city as a whole, and has long term affordability agreements with some housing providers. The city will have to perform analysis of any housing potential lost and gained since the last Periodic Review. An assumption behind the city's "no net loss" housing policy is that housing needs and accommodation are fairly ubiquitous, that is, housing lost in one part of the city can be satisfactorily replaced in another; and that one form of housing can be replaced by another. This assumption may not be bearing out. The city may wish to consider more refined housing conservation measures. Examples might

include limitations on the conversion of for-rent apartments to for-purchase condominiums and the replacement of smaller houses with larger ones, consideration of permanent affordability requirements for housing receiving deep public subsidy and the adoption of additional tools to encourage the provision of needed affordable housing such as more extensive “inclusionary” housing policies. The city might also consider the adoption of additional accessibility requirements to meet the needs of those with mobility limitations and allow aging in place.

5. Regulatory barriers. Portland was already amended its code definition of “household” to meet federal fair housing requirements, and to remove barriers to the provision of various forms of needed housing. The city has also amended its code to provide a “two-track” process for the review of residential building. One track provides a quick review through application of prescriptive standards; while the other provides a longer, but more flexible, approval through the application performance-based standards. While all state requirements have been met in this area, the city will certainly consider additional opportunities to provide more needed housing through adjustments in the development review process. The city might also consider an assessment of regulatory barriers in our zoning and other City codes to the development of new attached and multifamily housing types designed to provide needed housing. An example is courtyard housing designed for families with young and school-aged children.

Transportation Element

The transportation element is the most up-to-date part of our Comprehensive Plan. Regular updates are required to preserve eligibility for certain types of federal funding. The transportation element was last revised in April of 2007. This element includes, but is not limited to:

1. Maps designating the functional classifications and design types of various transportation facilities,
2. Policies that apply citywide or by transportation district, and
3. A list of authorized transportation projects.

As projects are funded they must be selected from the list. If a desirable project is not on the list, the Comprehensive Plan must be amended to include it before it can be funded. Although listed projects often include a cost estimate, project cost, timing, and engineering details these characteristics of projects are not "land use decisions" within the meaning of state law and are thus matters subject solely to the discretion of the Portland City Council.

The Oregon Land Conservation and Development has adopted a Transportation Planning Rule and an Airport Planning Rule. Portland complies with the transportation rule, but the Oregon Department of Transportation's regional staff has asked the city to take a second look at two particular provisions of the rule to see if further improvements could be made.

Portland did not consider the airport rule in its first Periodic Review, so must do so now. Fortunately the city has already adopted most of the types of regulations required by the rule, but these may have to be adjusted based on more current information and particular provisions of the airport rule.

Because the transportation element is so current, most of the work required by Periodic Review will probably involve airports rather than streets. Likely work might include:

1. Portland International Airport. The Portland zoning code already provides special high limitations, noise contours, and use restrictions for airport approaches and departures. These need to be examined and possibly updated based on newer information, changing technology, and expansion plans. Also, a simplified version of the airport layout plan should be recognized as a public facility in Portland's Comprehensive Plan.
2. Portland Heliport. The 20-year agreement to use the top deck of the Old Town parking garage as a heliport will expire soon. Continued use as a heliport might conflict with higher buildings around the garage; this issue should be examined and resolved as part of Periodic Review.
3. Oregon Highway Plan. Portland's Transportation element is coordinated with the state plan with one possible exception. The state plan has been amended to require "special transportation areas" for state highways that serve as main streets for urban centers. The city needs to examine its plans to see if the state requirements have been accommodated by existing provisions.

4. Regional Transportation System Plan. Metro will adopt a new regional plan in 2009. Portland will have one year to adopt any necessary conforming amendments.
5. Bicycle and Streetcar Master Plans. While these are not part of the Comprehensive Plan *per se*, certain plan provisions might have to be amended to carry them out. Examples of likely amendments include functional street classification changes to “transit” for new streetcar routes and the addition of projects to the plan list.
6. Service Standards. Portland like most other North American cities uses a “level of service” standard to rate the movement of traffic. This measure was devised for sizing new facilities in newly urbanizing areas, and thus provides less value in more mature areas. Portland, in concert with a similar effort at Metro, should consider adoption of an alternative mobility service standard for higher density mixed-use areas served by multiple modes of transportation.

Although not clearly tied to a Periodic Review need factor, the Oregon Department of Transportation’s regional staff has asked the city to review its procedures against two parts of the Transportation Planning rule. These provisions apply whenever the city changes a plan, zone, or code, so the request would become directly related to any Periodic Review work task requiring one of these changes.

7. City methods for determining a “significant affect” under the Paragraph 0060(1) of the state Transportation Planning Rule. Whatever the city’s service standard might be, the State Transportation Planning Rule requires an examination of traffic generation potential as a part of any proposal to change a plan, land use regulation, or zone. If the proposed change generates less traffic than the existing provision, no further examination is required. If more traffic is generated, it is possible that a service standard could be violated, and this would be a “significant effect” under the state rule. Oregon Department of Transportation staff has asked the city to describe, standardize, and formalize a method for determining a significant affect that employs a “reasonable worst case” applied with parity to the base case and the proposed case, or cases. These cases should employ 20-year horizons, and pay particular attention to effects on interchange areas.
8. Oregon Department of Transportation staff has also asked that Portland review its codes under Section 0045(2) of the state Transportation Planning Rule to insure state and federal facilities continue to be protected for their indented functions.

Public Facilities Element

This part of the plan describes the services the city is obligated to provide, sets service standards for city services, recognizes external mandates for safe drinking water and pollution control, and contains capital project lists necessary to support growth described and allowed by the Comprehensive Plan. The last major revision was in April 1989 when a list of capital project was added to the plan to comply with the then new state Public Facilities Rule. Only the transportation projects on this list have been kept current through state “post-acknowledgement plan amendment” procedures.

Periodic review of the facilities element will probably involve the following type of work.

1. **Asset Management.** An assessment of existing capital assets in good, fair, and poor condition, a estimate of the costs of mainating these assets, and an estimate of funding, and fund sources, likely to be available for maintenance.
2. **Facilities Supporting Growth.** Identification of new facilities and existing facility upgrades necessary to support new development described and allowed by the Comprehensive Plan with an estimate of funding, and fund sources, likely to be available.
3. **External Mandates.** Identification of projects needed to comply with federal Clean Water Act and federal Safe Drinking Water requirements with an estimate of funding, and fund sources, likely to be available. Drinking water requirements might also require a more precise delimitation of wellhead protection areas, and the development of more precise water conservation policies.
4. **Service Standards.** Based on new information on costs and likely funding, the city may wish to revisit published service standards.
5. **New Project List.** All significant projects needed to support the Comprehensive Plan have must be amended into the official plan list. Project descriptions should be specific enough to tell that a funded project is actually a listed project.

Urbanization Element

As described in the Economic and Housing sections above, Metro fulfills many on the state urbanization obligations that would have fallen to Portland if it were a “stand alone” city not sharing an urban growth boundary with any other municipalities. Metro forecasts 20-year population and employment growth for the entire region, derives a housing unit need from population, then apportions the total regional housing and employment needs to Portland, 25 other cities, and unincorporated urban and urbanizing areas in three counties. Portland’s is obligated to demonstrate capacity to accommodate at least its apportioned share, but has wide discretion on how, when, and where to accommodate identified need. It also has the discretion to exceed regional minimums

In a nutshell, how, how much, when, and where the city grows (and the areas the city chooses to shield from future development), is what the state calls “urbanization.” Portland’s existing Comprehensive Plan suffers from the absence of a discrete urbanization component, and a practice of trying to describe in written plan policy what might be better depicted in maps, drawings, or diagrams. The Comprehensive Plan Map probably presents the clearest description of a desired future settlement pattern by depicting allowed uses, and in some cases, intensity of use. The city’s zoning map and code are required to conform to the comprehensive Plan map.

Statewide Planning Goal 2 requires a consideration of alternatives for accommodation anticipated growth, and this obligation might be best fulfilled by presenting alternative scenarios (different patterns of growth and development, location, mix, intensity) describing the costs, advantages, and disadvantages of each.

Periodic review will likely involve:

1. Scope: An assessment of information on hand, existing condition, trends, and the identification additional information needed to make a good decision (this is the step the city is beginning with this memorandum).
2. Alternatives. Consideration of alternative ways to accommodate anticipated employment and housing needs. One of these alternatives will be a “base case” that depicts a probable build-out of the existing plan.
3. Decision. Selection of a preferred alternative, and revision of the Comprehensive Plan Map to reflect this decision.
4. Implementation. Adjust the zoning map and code to conform to the new Comprehensive Plan map.