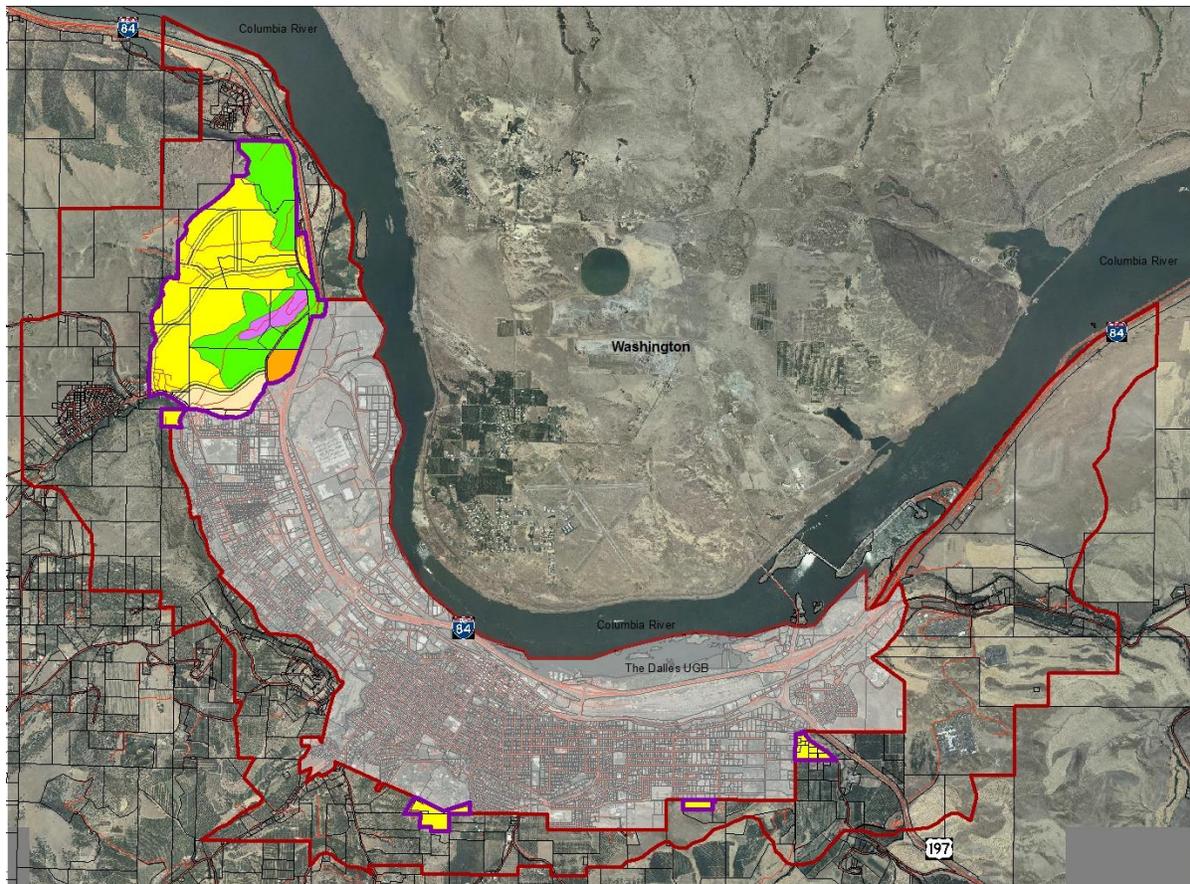


THE DALLES GROWTH MANAGEMENT REPORT

INCLUDING REVISED FINDINGS ADDRESSING THE REQUIREMENTS OF
OREGON'S STATEWIDE PLANNING PROGRAM AND
THE COLUMBIA RIVER GORGE NATIONAL SCENIC AREA ACT
AND SUPPORTING

THE DALLES 2013 URBAN GROWTH BOUNDARY / URBAN AREA EXPANSION PROPOSAL AND RELATED COMPREHENSIVE PLAN AMENDMENTS



This project is funded by Oregon general fund dollars through the department of land conservation and development. The contents of this document do not necessarily reflect the views or policies of the state of Oregon.

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Background Reports and Memoranda

Volume II of The Dalles Comprehensive Plan includes the following background documents that justify the need for, and location of the Year 2026 UGB:

- *Land Use Needs and Locational Analysis* (Erik C. Rundell, City of The Dalles, 2005)
- *Population Forecast for The Dalles* (ECONorthwest, 2006)
- *City of The Dalles Economic Opportunities Analysis* (ECONorthwest, 2007)
- *City of The Dalles Residential Land Needs Report* (Winterbrook Planning, 2007)
- *City of The Dalles Recommended Zoning District Amendments* (Winterbrook Planning, 2006)
- *City of The Dalles Demographic Trends Analysis* (Winterbrook Planning, 2006)
- *Buildable Lands Inventory Methods and Maps for The Dalles UGB and URA* (Winterbrook Planning and the City of The Dalles, 2006)
- *Goal 13 Energy and Land Use Analysis* (ECONorthwest, 2006)
- *Urban Growth Management Report* (Winterbrook Planning, 2007)
- *Preliminary Cultural Resources Evaluation for The Dalles* (David Ellis, 2011)
- *City of The Dalles Natural Resource Inventory* (Winterbrook Planning, 2011)
- *Scenic Resources Evaluation for the City of The Dalles* (Ecotrust, 2011)

Additional Supporting Documents

- *Public Facilities Plan for 2026 UGB* (City of The Dalles Public Works Department and Winterbrook Planning, May 2013)
- *Rural Residential Area Capacity Analysis* (City of The Dalles Community Development Department, 2007)
- *Rural Residential Buildable Lands Inventory* (Winterbrook Planning, 2013)

INTRODUCTION

A. Executive Summary

The City of The Dalles' growth is severely constrained by topographic features. The Dalles was originally sited on a bench on a bend in the Columbia River. The bench is confined by steep slopes and rimrock. Stream corridors and associated roads connect the town site with the upland plateau to the south, east and west.

Non-irrigated areas on the moderately fertile plateau to the east and west of The Dalles are farmed for wheat. This area is comprised primarily of Class II-IV agricultural soils, with inclusions of poorer soils. Irrigated Class II-IV areas to the south have proven ideal for growing cherries – an industry that is highly valued in Wasco County. Grazing and relatively non-productive lands west and east of The Dalles generally have lower value (Class VI-VIII) soils. Agricultural land is protected by Statewide Planning Goal 3 (Agricultural Lands).

In 1983, The Dalles Urban Growth Boundary (UGB) was acknowledged by the Land Conservation and Development Commission (LCDC). The 1983 UGB included 7.3 square miles of land and was intended to meet growth needs for the next 20 years. At that time, planned growth was confined by the Columbia River, Federal Bonneville Power Administration land to the east, and cherry orchards to the south. In 1983, The Dalles had sufficient buildable land to meet 20-year growth needs without including grazing lands and exception areas to the northwest.

In 1986, the United States Congress adopted the Columbia River Gorge National Scenic Area Act (the Act), which established the bi-state Columbia River Gorge Commission (Gorge Commission). Under the provisions of the Act, the Gorge Commission established the National Scenic Area surrounding The Dalles UGB. As intended by Congress, the Gorge Commission exempted the area within The Dalles UGB from provisions of the Act.¹ Even if justified under Oregon's Statewide Planning program, however, the Gorge Commission would need to approve a "minor amendment" to expand The Dalles Urban Area boundary.²

In 1993, the City conducted a thorough review of The Dalles Comprehensive Land Use Plan (CLUP) with respect to employment, housing, park and institutional needs. As part of that process, the City adopted strong policies to encourage affordable housing and efficient use of land for urban development. The City also adopted policies to allow mixed-use, nodal commercial centers. As a result, actual residential development in The Dalles has averaged

¹ Due to mapping discrepancies, approximately 144 acres at the edge of The Dalles UGB (including an area within the city limits) were not given urban exempt status, and, therefore, have been required to comply with NSAA scenic standards. For the purposes of this analysis, land within The Dalles' acknowledged UGB was considered to be available for urban uses.

² Some believe that a "major amendment" would be required to approve expansion of The Dalles Urban Area. A major amendment requires an Act of Congress.

approximately 5.0 dwelling units per gross buildable acre (or 6.3 units per net buildable acre) – relatively high density for a community east of the Cascades.

In 2005, the city of The Dalles received a grant from the Oregon Department of Land Conservation and Development (DLCD) to conduct a series of growth management studies designed to address the Oregon’s demanding statewide program as set forth in statute, planning goals and administrative rules. These studies included:

- A 20-year population and employment projection coordinated with Wasco County;
- An Economic Opportunities Analysis (EOA);
- A Residential Land Needs Report (RLN Report);
- A Buildable Lands Inventory (BLI);
- A UGB expansion alternatives analysis; and
- Recommended policies and implementation measures to ensure efficient urbanization and protection of natural features.

These studies were used to document 20-year need for employment and residential land, compare this need with the supply of buildable land within the UGB, and make a preliminary determination of the capacity of the City’s 1983 UGB to accommodate planned population and employment growth through 2026. Based on these studies, the City initially determined that there was an unmet need, or deficit of 745 buildable acres within The Dalles’ UGB.

Oregon’s Goal 14 requires that cities adopt “efficiency measures” to increase densities within UGBs *before* the UGB can be expanded to include rural land. The Act also requires that urban area expansions would result in “maximum efficiency of land uses within and on the fringe of existing urban areas”.³ The Dalles adopted policies and zoning standards to increase densities by 12% - from the actual average of 5 units per gross acre experienced in the previous 10 years, to 5.6 units per gross acre (7 units per net acre)⁴. As a result of adopted efficiency measures, the need to expand the UGB was reduced to 682 buildable acres.

Like the Act, Oregon’s planning program requires that cities avoid high value agricultural land when expanding their Urban Areas / UGBs. Due to state regulations and local values, the City chose to avoid large tracts of irrigated cherry orchards to the south and west of the 1983 UGB – and to focus instead on “exception areas” (areas that are not zoned for farm or forest use) and lower-value grazing land to the north of the 1983 UGB. Land owned by the Bonneville Power Administration (BPA) was included to facilitate future extension of urban facilities through this area – so that higher elevation grazing land (tentatively designated as “urban reserve”) could eventually be served to the east.

The UGB expansion proposal was also designed to minimize impacts on scenic areas, natural resources and “special management areas” designated in the Columbia River Gorge Management Plan.

³ NSAA 544b Sec 4(f)(2)(C).

⁴ OAR 660-024a provides “safe harbor” assumptions for urban growth planning in Oregon cities. These are intended to be conservative assumptions that cannot be challenged under Oregon’s land use system. Cities with forecast populations between 10,000 and 25,000 are provided a safe harbor for UGB planning of 7 dwelling units per net acre – consistent with the urban growth density assumption used by The Dalles.

- Scenic impacts were minimized by directing growth mainly to Hidden Valley (drained by Gooseberry Creek) – an area that is largely obscured from Key Viewing Areas (KVAs) by topographic features.
- Rare plant communities⁵ (which tend to correspond with uncultivated steep rocky areas), were either excluded from the UGB expansion area or protected by new local regulations that prohibit development on slopes of 25% or greater.
- Finally, the Urban Area expansion proposal avoids *all* “special management areas” near the Dalles Urban Area, including Squally Point Dunes, Crates Point, and Chenoweth Table.

These studies and the Urban Area expansion proposal were prepared in coordination with Wasco County and Gorge Commission staff – with oversight from DLCD. The City also consulted with and considered comments from Warm Springs Tribal representatives.

In 2007, DLCD staff supported the Council’s decision to “tentatively adopt” the comprehensive plan amendment package – which included policies to (a) increase land use intensity within the 1983 UGB, (b) protect natural features within the 1983 UGB and proposed expansion area, and (c) expand the UGB to meet 20-year population and employment growth needs. However, both Gorge Commission staff and Tribal representatives asked for additional studies to more explicitly identify and address scenic, natural and cultural resources within the UGB expansion area – that is, the area proposed for future exemption from the standards of the Act.

Urban Area Map Correction

When the Gorge Commission mapped The Dalles’ Urban Area in the 1980s, the intent was to match the City’s acknowledged UGB. In fact, the Urban Area did not account for 144 acres within the acknowledged UGB. Part of The Dalles “Urban Area” expansion proposal is to correct this inconsistency. The studies completed from 2006- 2012 all assumed that this land is part of The Dalles UGB for purposes of determining 20-year land need and buildable land supply.

2010 Land Need Revisions and LUDO Amendments

In 2010 The Dalles adopted a series of amendments to the CLUP and Land Use and Development Ordinance (LUDO) to ensure that residential density targets are met and that employment land developed efficiently. The effect of these amendments was to further reduce 20-year land need by 225 buildable acres. **As a result, the previously-estimated 2026 buildable land need was reduced from 682 buildable acres (for both residential and employment purposes) to 457 buildable residential acres.** The 2010 amendment package also included stream corridor and wetland protection measures for land and water areas within the existing and proposed UGB.

⁵ The NSA Management Plan calls for the identification and protection of rare plant species within the NSA (Part I, Chapter 3, pp. 25-26)

2010-12 Studies and Local Protection Programs

In 2010-11 DLCD provided additional grant funds for three studies designed to address concerns raised by Gorge Commission staff and Tribal representatives. These studies were prepared by experts in their respective fields; the studies identified and mapped scenic, natural and cultural resources in a 7,497-acre study area outside the 1983 UGB.

- **Scenic Inventory:** Ecotrust is nationally known for its expertise in applying Geographic Information Systems (GIS) to analyze and map environmental and social values. Ecotrust used its extensive GIS capability to further analyze scenic impacts within the UGB expansion study area that can be seen from Key Viewing Areas (KVA). The City used this analysis to eliminate a several “high” and “moderate” visibility areas from the UGB expansion area proposed in 2007, and adopted additional protection measures for “high” visibility areas that remained within the revised UGB expansion area.
- **Natural Features Inventory:** Winterbrook Planning prepared a natural features inventory that identified and mapped stream corridors, wetlands, native oak habitat and steeply sloped habitat areas. The City used this study to remove additional land from the UGB expansion area proposed in 2007 – including oak habitat, rocky slopes (rare plant areas) and the Seven Mile Creek and Chenoweth Creek riparian corridors. The City also adopted additional policies and land use regulations to protect stream corridors and wetlands within the revised UGB expansion area.
- **Cultural Resources Inventory:** Willamette Cultural Resources Associates (Willamette CRA) prepared a cultural resources study that modeled the probability of finding archeological resources. This study determined that archeological resources were most likely to be found on land with less than 25% slope outside the 1983 UGB. Thus, land that is “buildable” in modern times is most likely to have cultural resource values. The City is currently working with the Tribes on a Cultural Resources Management Plan to ensure that cultural resources are identified, and that impacts are avoided, minimized or mitigated through the development review process.

Revised and Reduced UGB Expansion Area

The 2026 UGB expansion proposal, as a result of the changes outlined above, covers less than half the 2,500 gross acres proposed (and supported by DLCD staff) in 2007. To meet the revised need for 457 buildable residential acres, the revised UGB expansion area is predominantly to the north in Hidden Valley – an area that can be efficiently provided with urban services and is “hidden” from KVAs by a ridgeline and a hill. Hidden Valley now is used for non-irrigated grazing, a manufactured home park, a gravel quarry, and a golf course.

Table 1 accounts for the 1,103 gross acres (including 660 open space or unbuildable acres) proposed for inclusion within the 2026 UGB. The *buildable* area shown on Table 1 comes to 434 acres – approximately 23 acres under the identified Year 2026 residential land need. The 144 acres identified as “correction areas” is land that is within The Dalles UGB but not within “Urban Area” originally mapped by the Gorge Commission. This correction area is accounted for in the City’s comparison of 20-year land need and supply.

Table 1: Expansion Area Components and Acreage (2012)

Description	Acres
Industrial (Quarry)	41
Proposed Park / Open Space (Scenic) Areas	320
Buildable Areas in Exception Lands	29
Buildable Areas Zoned EFU (Non-irrigated grazing land)	405
Unbuildable Areas (Developed, Natural Features)	308
Total UGB Expansion Within the NSA	1,103
Correction Areas (Urban Area correction)	144

B. The Dalles Planning Background 1982-2007

1982-1993 Comprehensive Planning

The Dalles is the largest of the 13 Urban Areas listed in the Act. The city is subject to both the requirements of the Act, as well as the Oregon Statewide Planning Goals, with regards to growth and protection of natural, cultural, agricultural and scenic resources. Since the Act's adoption in 1986, The Dalles has not sought to expand its Urban Area.

The Dalles adopted its first comprehensive plan in 1982, prior to the adoption of the Act. The 1983 UGB included 7.3 square miles of land and was intended to meet growth needs for the next 20 years. At that time, growth was confined by the Columbia River, Federal Bonneville Power Administration land to the east, and cherry orchards to the south. In 1982, planned population and employment growth in The Dalles did not justify expansion into lower quality agricultural soils (grazing lands) up Chenoweth Creek to the west and into Hidden Valley to the north.

In 1993, the City adopted substantial amendments to its comprehensive plan based on an extensive public and agency involvement program that resulted in a Community Vision Statement: *Pioneering The Dalles: A Vision for The Dalles in the Year 2020*. As part of that process, the City adopted strong policies to encourage affordable housing and efficient use of land for urban development. The City also adopted policies to allow mixed-use, nodal commercial centers. As a result, residential development in The Dalles has averaged approximately 5.0 dwelling units per gross buildable⁶ acre – relatively high density for a community east of the Cascades. During the 1993 review, no changes or additions were made to The Dalles Urban Growth Boundary (UGB) or Urban Area.

2005-2007 Growth Management Studies

By 2005, it became clear that the 1983 The Dalles Urban Growth Boundary and roughly corresponding Urban Area (originally approved in the late 1980s), lacked sufficient land to accommodate long-term residential, employment and support land use needs through 2026.⁷ To address these needs, the City undertook several studies to assess the amount of land that should be added to the Urban Area and where the Urban Area should be expanded to meet these needs. In August of 2005, the City published the first of these studies, the *Land Use Needs and Locational Analysis* (Erik. C. Rundell, RARE Planner). In February of 2006, Winterbrook Planning and ECONorthwest were chosen by the City to prepare comprehensive plan amendments and supporting studies necessary to justify expansion of the City's UGB / NSA Urban Area, and Urban Reserve Area (URA).

In 2007, with support from DLCD, the City of The Dalles tentatively adopted a complete comprehensive plan amendment package, including an Economic Opportunities Analysis (EOA), Residential Land Needs Analysis (RLNA), Buildable Lands Inventory (BLI), UGB alternatives

⁶ A "buildable" acre is an acre of land without mapped natural feature constraints (e.g. steep slope, wetlands, riparian areas) or development.

⁷ Oregon law requires that cities plan for 20 years of urban growth. The planning timeframe for the 2005-2007 studies was through the year 2026.

analysis, and Comprehensive Plan policy and Land Use and Development Ordinance (LUDO) amendments. Notably, these amendments will result in substantial increases in residential densities and increased land use efficiency, reducing the amount of buildable land needed within the City's Year 2026 UGB.

However, this package was not considered further by the County, pending resolution of issues raised by Gorge Commission staff and the Warm Springs Tribe, who believed that additional studies were needed to address potential effects of Urban Area expansion on natural areas, scenic views and cultural resources.

C. 2007-2012 Revisions and NSA Studies

From 2007 to 2012, Winterbrook worked collaboratively with City, DLCDC and Gorge Commission staff to prepare a series of natural area, scenic and cultural resource studies; revised its 20-year land needs analysis; supported an ongoing public and agency involvement process; revised the Urban Area expansion proposal, and drafted findings in support of a revised UGB and Urban Area expansion.

These additional efforts included:

- A revised Economic Opportunities Analysis (EOA) that reduced the expected need for large employment sites, as well as overall employment land need;
- Residential zone amendments to increase housing efficiency (these included increased minimum density in all residential zones, the addition of attached housing as an outright permitted use in the Low Density zone, and allowing all housing types in the Medium Density zone);
- Mapping and adopting regulations protecting riparian resources;
- Mapping and analyzing natural features (including wetlands, riparian areas, oak habitat, and rare plant species) in study areas around the UGB;
- Mapping and analyzing scenic resources – including a detailed GIS analysis of areas seen from key viewing areas performed by Ecotrust;
- Mapping and analyzing the probability of cultural resources being present in alternative expansion areas, and developing draft cultural resources management plan and draft coordination agreement for development in “high probability” cultural resource areas.

Throughout this process, consideration was given to the realistic needs of the City, as well as the sensitivity to the surrounding natural, cultural, agricultural and scenic resources. The City has carefully balanced its need to accommodate growth with the requirements of both the Act and Oregon's Statewide Planning Goals. Based on five years of study, the City has taken steps to minimize impacts on the National Scenic Area by avoiding, where possible, the inclusion of sensitive areas and adopting policies to protect sensitive areas that are brought into the expansion area. The City has also substantially reduced the proposed expansion area in response to concerns of the Gorge Commission staff and the Tribes.

Summary of Steps to Minimize Scenic Area Impacts

Specifically, the City has taken a series of steps to minimize impacts on the scenic area by:

- Substantially reducing the proposed Urban Area expansion by moving the boundary back to the 20% slope line on the west side of the north expansion area, as opposed to the 25% slope line.
- Protecting steeply-sloped, rocky areas potentially harboring rare plants.⁸
- Adopting policies and regulations to protect streams by requiring a 50-foot setback from the top-of-bank.
- Removing riparian areas associated with the Chenoweth Creek, Chenoweth Creek Canyon and associated riparian corridor and Seven Mile Creek from the proposed expansion area.⁹
- Protecting high value scenic areas within the north expansion from development by placing a Parks / Open Space (Scenic) designation on those areas; the scenic overlay limits any ground-disturbing activities that would adversely affect scenic values in the overlay district.
- Removing a proposed commercial area from the northern Urban Area expansion proposal.
- Removing the steeply sloped area along Highway 97 from the proposed expansion area to avoid the creation of a canyon effect as one enters the City.
- Excluding BPA lands and a proposed east-side commercial area from the proposed Urban Area expansion).
- Removing rural residential areas proposed for inclusion within the Urban Area that also have high proportions of high and moderate scenic value areas, probable historic resources, and/or mapped natural resources.¹⁰
- Amending the Comprehensive Plan and Zoning Ordinance to increase density 12% over historic trends by increasing minimum densities in all residential zones, allowing attached housing in the low density zone, and allowing all housing types in the medium density zone.

As a result of these efforts and as outlined in detail below and in the attached documents, the City of The Dalles believes that it has achieved the balance contemplated in the Act, and now meets the requirements for a “minor revision” under the Act.¹¹

⁸ Consistent with NSA Management Plan goals and policies to identify and protect rare plants (Part I, Chapter 3, pp. 25-26). Rare plants were identified as part of the *Natural Resource Inventory* process, but specific locations cannot be mapped in public documents.

⁹ This report provides detailed explanation for exclusion of these areas in Part I. In summary, these areas were excluded due to an adverse impact (scenic and environmental) on the National Scenic Area that was disproportionate to their residential capacity.

¹⁰ Note: when faced with apparently conflicting federal and state requirements, the City generally favored the requirements of the Act. The City is willing to include all the adjacent exception areas shown in the UGB expansion area – if required by both the Gorge Commission and the LCDC. The effect of excluding previously-included exception areas is that The Dalles would have a slight shortage of buildable land to meet Year 2026 land needs; the effect of bringing in all the previously-excluded exception areas is that the City will have Year 2026 surplus of 50-100 acres – depending on the method used to calculate the capacity of the excluded exception areas. The City has already demonstrated that it can provide urban services efficiently to all exception areas shown on the 2007 UGB amendment proposal.

¹¹ National Scenic Area Act 544b Sec 4(f)(2)(A-D).

Changes to Urban Land Need and Supply 2007-2012

The Dalles Periodic Review Phase II included a re-evaluation of land need and supply for the 2026 UGB. In 2007, the City determined that there was an unmet need (within the 1983 UGB) for 682 buildable acres. As a result of analysis completed by Winterbrook Planning in 2010 and 2013, this figure was reduced to 457 acres – a reduction of 33%. The following section discusses changes in buildable land need estimates from 2007 to 2013, as well as revised employment and residential land need summaries.

Employment Land Need Summary

In 2007 the City tentatively adopted its Year 2026 UGB based on the EOA prepared by ECONorthwest. That UGB proposal included 141 buildable acres within the expanded Urban Area to meet employment needs. In 2010, the City Council directed Winterbrook to amend the EOA to exclude the need for employment sites of 50 acres or greater – based on the Port of The Dalles view that there is unlikely to be demand for sites of more than 20 acres. This decision had two effects: (1) the City decided to increase reliance on redevelopment opportunities to meet Year 2026 employment needs; and (2) there was no longer a need to expand the UGB to meet employment land needs. Revisions to The Dalles EOA had the effect of reducing the need to expand the UGB for employment purposes by 141 buildable acres.

Residential Land Need Summary

The tentatively adopted 2026 UGB accommodated the need for an additional 541 buildable acres of residential land identified in the RLNA. This need included adopted measures to increase density both inside and outside the 1983 UGB.¹²

As part of Periodic Review Phase II work, Winterbrook re-evaluated public and semi-public land needs, and discovered two areas of double-counting in the original analysis: government need and golf course expansion. Correcting for the double-counting of government land need, and partial double-counting of golf course land need, reduced residential land need by an additional 72 buildable acres. Adopting land use efficiency measures and recalculating residential land needs had the effect of reducing the baseline need to expand the UGB for residential and institutional land needs by a total of 137 buildable acres.

Table 2 shows unmet need for residential land within the 1983 UGB. As shown in Table 2, after the efficiency measures and corrections listed above, there is an unmet 2026 need for 457 buildable acres of residential land.

¹² The measures reduced housing land need by 65 buildable acres – an approximately 12% increase in efficiency over actual development patterns experienced since the 1993 plan update.

Table 2: 2012 Residential Land Surplus (Deficit), 1983 UGB.

Residential UGB Plan Designation	UGB Buildable Acres (2006 BLI)	2026 Housing Need	P/OS Need	Residential Land Surplus (Deficit)
Low Density	296	425	266	(395)
Medium Density	19	70	0	(51)
High Density	33	44	0	(11)
Totals	348	539	266	(457)

Source: Winterbrook, 2012

Changes to the Proposed UGB Expansion Area (2007-2012)

The UGB that the City Council tentatively adopted in 2007 included over 2,500 gross acres of land to meet employment and residential land need. The revised proposal is for 1,103 gross acres. Proposed reductions resulted from:

1. Revised employment and residential land needs projections discussed above;
2. Consideration of 2011 studies and application of CRGNSA criteria; and
3. Communications with CRG staff.

Of the proposed 1,103-gross acre expansion area, approximately 434 acres are considered buildable for residential purposes. The remaining acres are either developed or considered unbuildable due to the presence of protected natural features, such as steep slopes (i.e., slopes over 25%), stream corridors and wetlands.

Hidden Valley

Overall, The Dalles has reduced the amount of National Scenic Area to be included in the proposed 2013 Urban Area expansion by more than half. The UGB proposal is now focused predominantly to the north – providing for efficient residential development within Hidden Valley – an area that is drained by Gooseberry Creek and “hidden” from KVA by a ridgeline and a hill. Hidden Valley now is used for non-irrigated grazing, manufactured home parks, a gravel quarry, and a golf course. Due to intervening ridgelines, most of the developable area within Hidden Valley is invisible or has relatively low visibility from KVA. Expansion to Hidden Valley provides the opportunity to meet efficiently most of the City’s 20-year residential needs, while impacting fewer areas with high scenic, agricultural, cultural and natural values adjacent to The Dalles UGB.

Special Need Areas

Three areas have unique locational requirements based on existing development. These “special need areas” are proposed for inclusion within the 2026 UGB and include: (a) a developed middle school property, (b) a developed church property, and (c) vacant land needed by Columbia Gorge Community College to expand its existing campus.

Rural Residential Areas

Rural residential exception areas (land that is “built and committed” to non-farm use) are the highest priority for inclusion within a UGB under Oregon law (ORS 197.298 and OAR Chapter 660 Division 024). However, to meet the requirements of the Act, several such exception areas

were removed from the UGB amendment proposal due to their scenic, natural area, and/or historic value. The proposal does include two rural residential areas with relatively low scenic, natural and historical values. These two areas have a total of 20-39 gross buildable acres, depending on assumptions used.¹³

Urban Area Inconsistency with UGB

There are 144 gross acres that are currently within the 1983 UGB but outside the Urban Area (correction areas). The City proposes to correct this inconsistency by matching the NSA Urban Area boundary to the City’s 1983 UGB. Correction areas were accounted for in the City’s existing land supply as available for urban development. Table 3 summarizes these areas of inconsistency.

Table 3: Urban Area / UGB Inconsistencies

Type	NSA Land Use				Total
	O/W	PR	R-1/R-5	A-1/A-2	
Mapping Discrepancy < 80'	3		10	34	48
Within Columbia River	13				13
East Along I-84		6		9	15
South - E 19th and Dry Hollow			14		14
Southwest - Wright Drive				4	4
West - W 13th and Pomona			41	10	51
Totals	16	6	66	57	144

¹³ This is further explained in the *Rural Residential Buildable Lands Inventory*. These two areas consist of 12 parcels containing approximately 150 dwellings, and at least one dwelling on each. Therefore all future development would be infill. Assuming 100% of potential infill area to be developed in the next 13 years (through 2026) would result in 39 “buildable” acres. Assuming 50% development of potential infill would result in 20 buildable acres. This analysis applies an assumption of 100% infill development for both areas proposed to enter the UGB, which is highly optimistic.

PART I: URBAN GROWTH BOUNDARY JUSTIFICATION FINDINGS DOCUMENTING COMPLIANCE WITH OREGON'S PROGRAM

In 2005, the Land Conservation and Development Commission (LCDC) adopted the “new” Goal 14 (Urbanization). In 2006, LCDC adopted the Goal 14 administrative rule (OAR Chapter 660, Division 024), which describes the process and standards that must be followed to comply with Statewide Planning Goal 14 (Urbanization). Both Goal 14 and its implementing rule require that cities and counties co-adopt population projections and amendments to established urban growth boundaries.

- **Part I-A Land Needs Assessment** of this report justifies the “gross buildable”¹⁴ land area that must be added to the 1983 UGB to meet Year 2026 land needs. To expand a UGB, cities must first justify land area needed over the 20-year planning period. By comparing the land area needed with the supply of land remaining inside the UGB, the city and county can determine how much land that must be added to the UGB.
- **Part I-B UGB Locational Analysis** of this report addresses the location of the UGB. Generally speaking, ORS 197.298 Priorities for urban growth boundary expansion requires cities to bring in rural exception areas before farm or forest resource land to meet identified land needs. If resource land is needed, then lower value agricultural soils must be included within the UGB before higher value soils are considered. In The Dalles, this means including Class V-VIII grazing land first, followed by Class II-IV non-irrigated wheat land, followed by irrigated Class II-IV cherry orchards.

As noted below, the requirements of Oregon’s statewide planning program do not always correspond with the requirements of the Act. This report identifies areas of conflict and recommends proposed solutions. Generally speaking, the Act is given greater weight than applicable state statutes, goals and rules. A good example is the City’s tentative decision to exclude some “high priority” (under state law) rural residential exception areas *because* these areas have scenic, natural area and/or historic value (under the Act).

Part I-A: Land Needs Assessment (Goal 14 – Land Needs)

The Land Need section of Goal 14 reads as follows:

“Establishment and change of urban growth boundaries shall be based on the following:

- (1) Demonstrated need to accommodate long range urban population, consistent with a 20-year population forecast coordinated with affected local governments; and*

¹⁴ Gross buildable land is land that is free of topographical constraints, such as steep slopes, wetlands and riparian corridors. Based on comments from Gorge Commission staff, land within the National Scenic Area (NSA) boundary has more constraints than land outside this boundary.

(2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.”

The land needs assessment compares projected land needs through the year 2026 with the supply of land within the existing (2013) The Dalles UGB. Residential and public land needs are directly related to projected population growth. In contrast, employment land needs are based on the siting requirements of targeted employers.

Need for housing, employment opportunities, livability and public/semi-public uses over the “20-year planning period”¹⁵ are summarized in this report under sections titled “Employment Land Needs,” “Residential Land Needs” and “Public and Semi-Public Use Land Needs.” Together with examining measures to increase the intensity of land use within the existing (2013) UGB, these sections provide the basis for determining the amount and type of land that are needed outside the 1983 UGB.

The methodology used to evaluate need and supply is consistent with the *Urban Areas Boundary Revision Handbook* (Handbook) methodology to meet Criterion A – “A demonstrable need exists to accommodate long-range urban population growth requirements or economic needs consistent with the Management Plan”, which corresponds verbatim with Act Standard 544b, Sec 4(f)2(A).

Year 2026 Population Projection

The coordinated population projection is the basis for determining housing and public / semi-public land needs. The Wasco County Court adopted coordinated forecasts for Wasco County and its constituent cities on February 7, 2007. This forecast was based on a memorandum entitled “*Population Forecast for The Dalles*” prepared by ECONorthwest (May 26, 2006). The adopted and coordinated population projection shows a 2026 population of 22,545. The coordinated population projection is the foundation for determining the amount of land needed to accommodate population and livability growth needs within the 2026 UGB. As shown on Table I-1 below, The Dalles population is projected to increase by 7,073 from 2006-2026.

Table I-1: 2006-2026 Population Projection

Year	Population	Increase
2006	15,472	-
2026	22,545	7,073

Employment Land Needs

Goal 14, Land Need Factor 2 recognizes that changes to a UGB may be based on demonstrated need for employment opportunities. *The Dalles Economic Opportunities Analysis* (ECONorthwest, 2007 – Updated 2011), identifies targeted industries as well as needed site size

¹⁵ This report addresses identified year 2026 land needs, providing sufficient land for the next 13 years based on the acknowledged and coordinated population projection. .

and locational characteristics for those targeted industries. During this planning process, two significant employment events have occurred in The Dalles, affecting the available employment site supply:

- First, Google located facilities in The Dalles, developing on 50 acres of industrial land;
- Second, Northwest Aluminum shut down its facility and put most of their land on the market, creating four redevelopment sites for future employment, ranging in size from 19 to 120 acres.

Prior to Northwest Aluminum’s decision, The Dalles had no suitable employment sites over 50 acres in size, and would have needed to expand the UGB to include two 50+ acre employment sites. However, Northwest’s Aluminum’s decision to close its plant permanently meant that all of the City’s large-site industrial needs can be met within the existing (2013) UGB.

Table I-2 compares identified site needs with available sites from 2013-2026. The Dalles has a surplus of acreage available for industrial and other uses. For the 2013-2026 period, the City will need a considerable number of smaller sites, and will need to use some of its larger sites to meet the small site deficit.

Table I-2. Comparison of site needs and site supply, The Dalles UGB, 2013-2026

Site Size Range	Average Site Size	Sites Needed	Net Acres Needed	Supply: Sites	Supply: Net Acres	Needed Sites Surplus (def)	Needed Acres Surplus (def)
< 10	1	153	159	18	74	(135)	(84)
> 10	20	4	81	10	210	6	129
Non-site					49		49
Total		157	240	28	334		94

Source: estimates by ECONorthwest; modified by Winterbrook Planning in 2011 at direction of City Council

The EOA (pp. v-vi, and 59-60) provides additional direction as to how land should be allocated to meet employment needs:

- *The City has a surplus of industrial land. However, considering regional development trends and state and city policies concerning economic development, we recommend the City maintain its existing industrial land base for industrial and other employment uses.*
- *Topographic constraints in areas adjacent to the UGB limit the number of large industrial sites that the City could possibly expand into. The City should consider other policy options, including a long-term redevelopment strategy for existing industrial areas. Dallesport may be option that would be attractive to certain industries, but because of distance, the Dallesport Industrial Park is not a viable long-term industrial strategy for The Dalles.*
- *Some office and retail uses will probably locate on land designated for light industrial uses. [...]The City should consider policies that restrict commercial uses in some industrial areas.*

- *Over two-thirds of The Dalles' employment land supply is industrial. Our evaluation of the land capacity analysis is that the City should expand both the central business district and community commercial zones. The City should also consider identifying areas in close proximity to housing where neighborhood commercial services could be located. In addition, the City should consider establishing a business park designation that could accommodate office uses as well as certain light manufacturing uses.*

Employment Site Requirements

The revised EOA (2011) provides an overview of siting requirements for targeted industries. Winterbrook applied these locational need criteria to identify sites for targeted employers in The Dalles. Suitable large employment sites must:

- Be comprised of large blocks of land contiguous to or within the 1983 UGB;
- Have direct access to an I-84 interchange via an existing or planned arterial street (preferably within a mile of an interchange);
- Be located to avoid truck traffic through existing or planned urban residential neighborhoods;
- Minimize potential conflicts with existing or planned residential areas by minimizing common boundaries;
- Be adjacent to existing industrial development;
- Have slopes of 10 percent or less;
- Meet size requirements outlined by the EOA; and
- Be serviceable within the planning period with sanitary sewer, water and storm drainage facilities.

The Dalles is able to meet the large-site requirements of planned industrial users within the 1983 UGB – through redevelopment of the Northwest Aluminum site. The Dalles is also able to meet smaller site employment needs inside the UGB by subdividing larger industrial sites.¹⁶

Residential Land Needs

The *Residential Land Needs Report* (Winterbrook, April 2007) projected housing and public/semi-public land needs through 2026. The report first considered residential land needs based on recent development trends. This report determined that, should The Dalles continue to develop at types and densities consistent with actual development over the last seven years, The Dalles would have required 604 acres of residential land to meet housing demand through 2026, as shown on Table I-3 below.

Table I-3: 2026 Housing Land Need – Based on Actual Development

¹⁶ The Port of The Dalles received preliminary approval in 2013 for a 26-lot subdivision on property owned by the Port north of Chenoweth Creek.

2026 Housing Need - Actual Development	Acres
Low Density Residential	441
Medium Density Residential	93
High Density Residential	70
Total	604

However, Statewide Planning Goal 10 (Housing) requires that cities provide for the housing needs of existing and future residents, and requires cities to conduct a “housing needs analysis” that compares local housing needs with housing costs. The Dalles prepared such an analysis in 1992, when it adopted a series of effective measures to meet the housing needs of its citizens. Winterbrook updated this analysis in 2007 and considered recent increases in land costs and changes in housing types that have occurred over the last few years in The Dalles. Winterbrook concluded that increased densities and a broader mix of housing types were necessary to meet the community’s future housing needs. The Planning Commission reviewed and recommended approval of the RLN Report and additional “measures” to increase land use efficiency and reduce housing costs.

These measures are summarized below:

- Plan for more multi-family and higher-density affordable home ownership opportunities, including small lot single-family and row homes, as called for in the Residential Land Needs Report;
- Establish minimum densities in each residential zoning district:
 - Low Density Residential designation at 3-6 dwelling units per gross acre;
 - Medium Density Residential designation at 7-17 dwelling units per gross acre;
 - High Density residential designation at 10-25 dwelling units per gross acre;
- Plan for 20% of future single family dwellings to be affordable “small lot” single family on 4,000 square foot lots;
- Use variable lot dimensions to allow flexibility in platting irregular blocks. A wide lot of 55 to 70 foot width can present the illusion of a larger house where lot depth may be 70 to 80 feet. Alternating narrow and wide lots can be used to accommodate different housing plans and appeal to target markets.
- Allow for rental additions to existing single family neighborhoods with reasonable design guidelines. A new, generally small rental or "studio" unit can be created by converting a garage, building over garages, dormer additions on second stories, or basement apartment conversions.
- Cluster housing can increase the standard single family densities of 6 units per acre to anywhere from 8 to 14 units by clustering homes together and sharing open spaces.
- Attached housing in the form of duplexes and triplexes can be added to existing neighborhoods on relatively small lots. Many cities allow such development on large corner lots, while reserving interior lots for more traditional housing.
- Townhouses or rowhouses are the same, a single family attached dwelling with a common wall shared with other units. Typically these units are narrow (22' to 32' wide) arranged in clusters or rows of 2 to 10 units, producing densities of from 10 to 16 units per acre. Each townhouse and townhouse lot (2,000 to 3,500 square feet) is individually owned and may be sold or rented, appealing to many markets.

- Increase overall planned residential density from 5.0 to 5.6 dwelling units per gross acre, or 7.0 dwelling units per net acre;
- Include a new multi-family area within the 2026 UGB, west of the new Highway 30 commercial center;
- Allow for automatic density transfer through an administrative review process on sites with topographic constraints; and
- Adopt zoning code amendments that ensure residential densities occur within planned density ranges in each district.

The *City of The Dalles Recommended Zoning District Amendments* (Winterbrook Planning, July 2006) includes detailed recommendations to the City’s residential and mixed used districts that implement the above “measures.” These measures were adopted by the City Council in 2010. As shown in Table I-4 below, these measures effectively reduce Year 2026 buildable land needs by 65 acres (about 11%), when compared with actual densities that occurred from 2001-2006. Thus, based on new measures to reduce housing costs and increase land use efficiency, there is a demonstrated need for 539 gross buildable residential acres through 2026.

Table I-4: Reduced 2026 Housing Land Need – With Measures

2026 Housing Need - With Measures	Acres
Low Density Residential	425
Medium Density Residential	70
High Density Residential	44
Total	539

In addition to housing needs, the *Residential Land Needs Report* analyzed public and semi-public land needs that typically are met on land designated for residential use. These needs are summarized in Table I-5 below.¹⁷ Through 2026, The Dalles is projected to need about 266 acres of suitable land for public and semi-public uses.

Table I-5: 2026 Public / Semi-Public Land Need

2026 Public / Semi-Public Need	Acres
Schools	42
Community College	19
Park	103
Golf Course	71
Religious	26
Group Housing	6
Total	266

¹⁷ At the June 7, 2007 Planning Commission public hearing, the Columbia Gorge Community College presented the results of its recent facilities planning process, which documented the need for additional land adjacent to the existing college. As a result, The Dalles Planning Commission identified an additional need for community college expansion land that had not previously been addressed in the *Residential Land Needs Report*. Testimony was also provided by The Dalles Golf Course, which identified a need for additional land to expand its existing 9-hole course to a standard 18-hole course with practice facilities. On review of public/semi-public land needs in 2012, Winterbrook determined that Government needs had been double-counted, and that some golf course needs could be met on the existing golf course. Table I-5 reflects the updated public/semi-public land needs with these corrections.

Table I-6 shows The Dalles’ total residential land need through 2026, including land for housing and public / semi-public uses. The Dalles will require a total of 805 residential acres to meet its identified 2026 residential land needs.

Table I-6: 2026 Residential Land Need

2026 Total Residential Land Need	Acres
Housing	539
Public / Semi-Public	266
Total	805

The *Residential Land Needs Report* compared residential land needs with The Dalles’ existing residential land supply. As shown on Table I-7, The Dalles currently has 348 gross buildable residential acres inside its 1983 UGB.

Table I-7: 2013 Residential Land Supply, 1983 UGB

2013 Residential Supply	Acres
Low Density Residential	296
Medium Density Residential	19
High Density Residential	33
Total	348

The Dalles’ residential land supply is not sufficient to meet its 20-year residential land needs. As shown on Table I-8, The Dalles will require an additional 457 residential acres to meet residential land needs through 2026. This should not be surprising, since the UGB acknowledged in 1983 was designed to accommodate a 20-year land supply.

Table I-8: 2026 Residential Need and 1983 UGB Supply

2026 Residential Land Need vs 2013 Supply	Acres
Residential Land Need	805
Supply	348
Surplus (Deficit)	(457)

As noted in the discussion of the location of the 2026 UGB below, ORS 197.296 Priorities for urban growth boundary expansion, generally requires cities to include exception areas before including agricultural land. To meet ORS 197.298 priorities, The Dalles proposed in 2007 to include all residential exception areas adjacent to the 1983 UGB within the 2026 UGB –totaling approximately 520 gross acres. The Dalles Community Development Director analyzed residential housing capacity in these exception areas (*Findings for Exception Areas and Adjacent Properties*, The Dalles, June 2007), and determined they had the capacity to provide an additional 323 residential dwelling units – the equivalent of about 58 acres of buildable residential land at urban densities.¹⁸

¹⁸ **Note:** The City’s exception area capacity evaluation (2007) was prior to evaluation of natural and scenic areas (2011) in these areas, and was not performed with GIS. In addition, some of the exception area acreage was considered to be future commercial, rather than residential. GIS analysis of these exception areas in 2013, with the expectation that all acreage would be residential, determined they contained a total of approximately 99 buildable residential acres.

However, large portions of the exception areas proposed for expansion in 2007 were determined to be moderately to highly visible from key viewing areas (KVA) and/or contained significant natural features (see *The Dalles Rural Residential Buildable Lands Inventory*, Maps 4 and 5, and *The Dalles Scenic Resources Evaluation* and *The Dalles Natural Resource Inventory*). Put another way, the exception areas included about 237 acres of steep slope and natural resource land, and 209 acres of moderate to highly visible land, but provided only 69-109 buildable acres of residential capacity; moreover, most of the unconstrained (buildable) areas are only accessible through high value resources. To address scenic and natural area requirements of the Act, most of the relatively low yield (in terms of their ability to provide housing units) exception areas were removed from the proposed 2026 UGB expansion area. The remaining exception areas proposed for inclusion provide 20-39 buildable residential acres, but include only 31 acres of constrained land, and 10 acres of land with moderate visibility from KVA.¹⁹

The Dalles’ proposed 2026 UGB expansion is shown on Maps 5 and 6. The proposed 2026 UGB includes 444 acres of additional residential land, located primarily to the north of the 1983 UGB. As shown on Table I-10, inclusion of new residential land and exception areas will provide a total of 425-444 gross buildable acres²⁰ of residential land for housing and public / semi-public uses.

Table I-10: 2026 Residential Land Additions

2026 UGB Residential Additions	Acres
Buildable Residential Land,	405
Residential Exceptions Areas	39
Total	444

Table I-11 compares residential land need with residential land supply within the proposed 2026 UGB. The 1983 UGB has a residential lands deficit of 457 gross buildable acres. The proposed 2026 UGB adds 444 gross buildable acres. This leads to an overall 2026 shortage (deficit) of 13-32 (depending on potential infill assumption) gross buildable acres of residential land. Inclusion of the remaining 511 acres of adjacent exception areas would add approximately 44-109 acres of buildable land²¹ – resulting in an overall surplus of 12-96 acres. It should also be noted that all of the proposed UGB expansion area will be subject to The Dalles Cultural Resources Management Plan (CRMP). . The CRMP calls for the protection of significant cultural resources; however, the precise location, quantity and quality of such resources are not fully known at this

¹⁹ **Note:** The Dalles is willing and has the capacity to serve the exception areas that were proposed for inclusion within the UGB in 2007. However, the City requests that the Gorge Commission and DLCDC staff agree to this approach prior to City and County adoption of a final UGB.

²⁰ These 444 acres include the minor expansion areas (totaling 25 gross buildable acres) proposed for school and community college expansion. Though the school site is developed, it is considered suitable for meeting identified future public needs. The 39 buildable acres derived from exception lands assume 100% buildout of potential infill areas at urban densities within the next 13 years. As indicated in the *Rural Residential Buildable Lands Inventory*, assuming 50% buildout of rural residential areas over the next 13 years would be more realistic but still highly aggressive. A 50% buildout assumption would decrease the supply to 425 acres.

²¹ The high end of yield (109 buildable acres) assumes 100% of potential infill areas will develop at urban densities within the next 20 years, and an additional 25 acres of potential infill would develop in the 7 Mile Road area – an area not proposed for inclusion in 2007 due to natural resource, slope, and service constraints. The lower yield (44 acres) assumes 50% of potential infill areas will develop over the next 13 years, and the 7 Mile Road area will remain outside the UGB amendment proposal.

time. Since “buildable land” as defined in Oregon administrative rules is likely to have cultural resources (as determined in *The Dalles Preliminary Cultural Resources Evaluation*, Willamette CRA, 2011), it is impossible to know at this point how much of the “buildable land” within the proposed UGB expansion area is, in fact, buildable.

Table I-11: 2026 Residential Need and Proposed 2026 UGB Supply

2026 Residential Land Need vs Supply	Acres
2013 Residential Deficit	(457)
2026 Residential Additions	444
Total Surplus (Deficit)	(13)

Public / Semi – Public Site Requirements

School Site Needs

The RLN Report identified a 2026 need for about 42 acres of residential land for school sites for two elementary schools and one middle school. Schools have more stringent requirements for siting than land used for housing. Winterbrook applied the following siting requirements to determine future school site needs.

- **Site Size:** Year 2026 School site size needs fall in the following ranges:
 - Two elementary schools at 8-12 acres each; and
 - One middle school at 15-25 acres.
- **Topography:** School sites should be relatively flat, generally less than 5% slope, and not more than 10% slope. A portion of the site may exceed these slope criteria, so long as at least 90% of the site falls within the < 10% slope category.
- **Land Ownership:** Schools require large parcels to allow for efficient land development and to reduce consolidation costs. Sites with a single owner are strongly preferred.
- **Level of Development:** Sites that are developed, or partially developed, are less attractive as school sites. Undeveloped sites are preferred.
- **Natural Features:** Unbuildable land should be removed from the calculation. Lands with protected natural features (wetlands, floodplains, riparian areas) should not be considered in meeting site size requirements. Moreover, a stream or wetland that is located in the middle of a site could have the effect of dividing large school sites, and reducing the area available for development.
- **Street Access:** Elementary schools, middle schools should be located on or within a quarter mile of a collector street.
- **Shape:** School sites should be fairly regular in shape and should not be broken up by highways or natural features. School sites should have adequate depth and should not

depend on narrow configurations that result in inefficient land use or substantial frontage improvement costs.

- **Services:** Sanitary sewer and water service must be available, and have adequate capacity, to serve the site during the planning period.

Sites Proposed to Meet School Siting Needs

The School District owns a 12-acre lot with an existing school located on the west side of the 1983 UGB. The proposed 2026 UGB includes this site. The north UGB expansion area includes large, flat sites under single ownership that can meet remaining needs for an elementary and middle school, perhaps in concert with a community park.

Park Needs

The RLN Report identified new 2026 park needs totaling about 223 acres. The City applied the following park siting criteria:

- **Site Size:** The minimum site size should be 3-5 acres for neighborhood parks, and 15-20 acres for a community park. The neighborhood parks can be assimilated into residential development through park standards.
- **Topography:** Neighborhood and community park sites should be relatively flat so that they can accommodate facilities such as athletic fields and recreational buildings – generally less than 5% slope, and not more than 10% slope.
- **Land Ownership:** Parks require relatively large parcels with few owners to allow for efficient land development and to reduce consolidation costs. Sites with a single owner are strongly preferred.
- **Level of Development:** Sites that are developed, or partially developed, are less attractive as park sites. Undeveloped sites are preferred.
- **Natural Features:** Unbuildable land should be removed from the calculation for high density recreation areas. Lands with protected natural features (wetlands, floodplains, riparian areas) should not be considered in meeting site size requirements. While a stream or wetland may provide beneficial open space values, if it is located in the middle of a site, it could have the effect of dividing large sites, and reducing the area available for more intensive recreational development.
- **Street Access:** Neighborhood parks and community parks should have collector street access, or be within ¼ mile of a collector street.
- **Shape:** Park sites should be fairly regular in shape and should not be broken up by streets. Natural features should be located in such a way as to allow for adequate blocks of buildable land. Park sites should have adequate depth and should not depend on

narrow configurations that result in inefficient land use or substantial frontage improvement costs.

- **Services:** Sanitary sewer and water service must be available for urban parks, and have adequate capacity, to serve the site during the planning period.

Sites Proposed to Meet Park Siting Needs

Since the majority of park need is 3-5 acre neighborhood parks, which can be accommodated as part of residential development, the remaining unmet site need is for a 20-acre community park. The proposed Northwest UGB expansion area contains over 400 acres of residential land that potentially could meet park siting needs.

Part I-B: UGB Locational Analysis

This section addresses ORS 197.298 priorities; Goals 5, 7, 11-13; and Goal 14 Boundary Location Factors 1-4). The Goal 14 Boundary Location section reads as follows:

The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197.298 and with consideration of the following factors:

- (1) Efficient accommodation of identified land needs*
- (2) Orderly and economic provision of public facilities and services;*
- (3) Comparative environmental, energy, economic and social consequences; and*
- (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.*

Background

In 2005, the City published the *Land Use Needs and Locational Analysis* (Erik C. Rundell, RARE Planner for The Dalles). This document includes 36 GIS maps and text that summarize the physical (e.g., agricultural soil capability, slope, landslide areas, floodplains, wetlands, stream corridors); institutional (e.g., public and semi-public land ownership, NSA boundaries); and economic (construction costs based on topography) “limitations” that constrain long-term growth in The Dalles. These maps were prepared specifically to address Goal 14 locational factors as well as National Scenic Area Act (the Act) requirements for “urban exempt area” status (Act 544b, Sec 4(f)(2)(A-D)). Winterbrook and the City drew extensively from the maps and analysis in the Rundell study in evaluating the initial direction of growth.

Working with City staff from 2006-07, Winterbrook identified four study areas surrounding the existing (2006) UGB for potential inclusion in the UGB, and evaluated each study area for consistency with ORS 197.298 priorities and Goal 14 (Urbanization) Boundary Location Factors 1-4 and Goals 5, 6 and 11. To address ORS 197.298 priorities and Goal 14 Boundary Location Factor 4, Winterbrook mapped rural exception areas and agricultural lands in relation to the 2006 UGB.

- To address Goal 11 (Public Facilities and Services) and Goal 14 Boundary Location Factor 2, The Dalles Public Works Department analyzed the feasibility and cost of providing water, sanitary sewer and storm sewer services to each study area.
- To address Statewide Planning Goal 5 (Natural Resources, Scenic and Historic Resources, and Open Spaces), Goal 7 (Areas Subject to Natural Hazards) and Goal 14 Boundary Location Factor 3 (economic, social, environmental and energy consequences), Winterbrook conducted a preliminary inventory of wetlands (from the National Wetlands Inventory), riparian corridors and floodplains (LUNLA study), and wildlife habitat (based on Wasco County inventories) within each study area.

During the winter and spring of 2007, The Dalles also considered natural features identified in Columbia River Gorge National Scenic Area Management Plan (Management Plan). To

minimize impacts on special management areas, farm and forest land, cultural resources, historic resources (including the golf clubhouse and the Columbia River Highway), Columbia River scenic viewsheds, and natural features (including wetlands, streams, ponds, lakes, sensitive wildlife habitat, rare plants, and natural areas), the City modified its draft proposed 2026 UGB substantially.

However, this package was not considered further by the County, pending resolution of issues raised by Gorge Commission staff and Warm Springs Tribal representatives. Each group believed that additional studies were needed to address potential effects of Urban Area expansion on natural areas, scenic views and cultural resources.

From 2007 to 2012, Winterbrook worked collaboratively with City, DLCD and Gorge Commission staff to prepare a series of natural area, scenic and cultural resource studies; revise its 20-year land needs analysis; support an ongoing public and agency involvement process; and revise the Urban Area expansion proposal.

These additional efforts included:

- A revised EOA that reduced the expected need for large employment sites, as well as overall employment land need;
- Residential zone amendments to increase housing efficiency (these included increased minimum density in all residential zones, the addition of attached housing as an outright permitted use in the Low Density zone, and allowing all housing types in the Medium Density zone);
- Mapping and adopting regulations protecting riparian resources;
- Mapping and analyzing natural features (including wetlands, riparian areas, oak habitat, and rare plant species) in study areas around the UGB;
- Mapping and analyzing scenic resources – including a detailed GIS analysis of areas seen from key viewing areas performed by Ecotrust;
- Mapping and analyzing the probability of cultural resources being present in alternative expansion areas, and developing draft cultural resources management plan and draft coordination agreement for development in “high probability” cultural resource areas.

Throughout this process, consideration was given to the realistic needs of the City, as well as the sensitivity to the surrounding natural, cultural, agricultural and scenic resources. The City has carefully balanced its need to accommodate growth with the requirements of both the Act and Oregon’s planning program. Based on five years of study, the City has taken steps to minimize impacts on the National Scenic Area by avoiding, where possible, the inclusion of sensitive areas and adopting policies to protect sensitive areas that are brought into the expansion area. The City has also substantially reduced the proposed expansion area (by over 1,400 acres) in response to concerns of Gorge Commission staff and the Warm Springs Tribe.

The economic, social, environmental and energy consequences of the revised boundary are considered in Part I.B.3 of this report.

ORS 197.298 – Priority Areas for UGB Expansion

ORS 197.298²² requires that the following priorities be used in selecting land for inclusion in a UGB (in order of higher to lower priority for inclusion):

(1) Land designated as an urban reserve under ORS 197.298.

At this point, The Dalles has no lands designated “urban reserve”. Therefore, this priority does not apply.

(2) Exception areas or non-resource land adjacent to the UGB.

To examine the potential for rural exception areas to meet long-term growth needs, the City considered all “adjacent and nearby exception areas” within the study area. As shown on Maps 4 and 5, from the perspective of the Act, most adjacent exception areas contain significant natural areas or are moderately to highly visible. In addition, according to National Register criteria, exception areas with houses over 50 years old may contain historic structures. For example, the largest rural residential exception area, Murray’s Addition, was platted in the 1950s and includes many homes that are more than 50 years old. These areas are considered to be potential cultural resources under the Act.²³ In addition, as discussed in Part 1-A, all areas added to the UGB through this process would be subject to the CRMP which requires protection of cultural resources – when the precise location and extend of which are unknown at this time.

²² **197.298 Priority of land to be included within urban growth boundary.** (1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities: (a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan. (b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710. (c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition). (d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons: (a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands; (b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or (c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

²³ CRGMP Chapter II, GMA Policy 7: “A historic survey shall be required for all proposed uses that would alter the exterior architectural appearance of buildings and structures that are 50 years old or older, or would compromise features of the surrounding area that are important in defining the historic or architectural character of buildings or structures that are 50 years old or older.”

As a result of the additional studies performed in 2010-2011, and the *Rural Residential Buildable Lands Inventory* in 2013, most of the exception areas previously proposed for inclusion in 2007 are now excluded. The City reasons that if these exception areas cannot be included within the UGB based on the Act, then this land cannot reasonably meet urban growth needs – any more than unbuildable land can reasonably meet the need for buildable land.

Table I-B.1, excerpted from the *Rural Residential Buildable Lands Inventory* summarizes the name and location of each excluded exception area, gross acreage, the area constrained by mapped slope and natural features (from the *Natural Resource Inventory*), and High and Moderate visibility areas (from the *Scenic Resources Evaluation*), and provides ratios indicating relative buildable land yield.

Table I-B.1: Evaluation of Excluded Exception Areas and. Scenic / Natural Area Criteria

Exception Areas Excluded	Distance to UGB (Miles)	Gross Acres	High Visibility Acres	Mod Visibility Acres	Total Vis Acres	Constrained Acres	Buildable Acres	Buildable to Visible Ratio	Buildable to Constr Ratio	Average Ratios
Murray's Addition	0.5	189.7	0.5	38.1	38.6	53.4	42.7	1.1	0.8	1.0
Seven Mile Road	0.4	82.9	3.1	23.7	26.8	52.8	24.9	0.9	0.5	0.7
Foley Lakes (west)	0.4	36.9	4.5	22.9	27.4	6.0	21.7	0.8	3.6	2.2
Foley Lakes (central)	0.3	27.9	0.1	8.6	8.7	21.1	1.3	0.1	0.1	0.1
Cherry Heights	0	133.7	48.8	50.1	98.9	72.3	23.3	0.2	0.3	0.3
Mill Creek / Scenic	0	40.3	0	8.3	8.3	24.9	1.2	0.1	0.0	0.1
Total	NA	511	57	152	209	231	115	0.6	0.5	0.5

As noted in Table I-B.1, the exception areas not included in the proposed UGB expansion provide capacity for about 115 buildable acres of residential need, but include 231 acres of steep slope and natural resources, 57 acres of high visibility areas, and 152 acres of medium visibility areas. None of these areas provide ratios 1.0 or greater for both visible acres and constrained acres.²⁴ As discussed in the Rural Residential Buildable Lands Inventory, Foley Lakes (Central) provides a natural break in terms of terrain and visibility, so areas over ¼ mile from the UGB to the west of this point (Foley Lakes (West), Seven Mile Road, and Murray’s Addition) were also excluded for this reason.

As discussed in Part 1-A, if all of the excluded exceptions areas were included within the proposed UGB expansion area, this would provide a Year 2026 surplus of 12-96 acres, based infill and service assumptions. The Goal 14 rule makes it clear that needs estimates should not be held to an unreasonable level of precision.²⁵ If population and employment projections were extended to 2033, for example, this “surplus” land supply would rapidly be absorbed.

²⁴ A ratio of 1.0 in “Buildable to Visible” or “Buildable to Constr” indicates as many buildable acres as visible (or constrained) acres. Higher values indicate relatively more buildable land.

²⁵ **660-024-0040 Land Need** (1) The UGB must be based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. The 20-year need determinations are estimates which, although based on the best available information and methodologies, should not be held to an unreasonably high level of precision.

As noted in Table I-B.2, the two exception areas that remain within the proposed UGB have much different characteristics.

Table I-B.2: Evaluation of Included Exception Areas and Scenic / Natural Area Criteria

Exception Areas Included	Distance to UGB (Miles)	Gross Acres	High Visibility Acres	Mod Visibility Acres	Total Vis Acres	Constrained Acres	Buildable Acres	Buildable to Visible Ratio	Buildable to Constr Ratio	Average Ratios
Foley Lakes (east)	0.1	89.0	0.4	9.8	10.2	30.8	32.2	3.2	1.0	2.1
Dufur Triangle	0	20.6	0	0	0	0	7.2	5	5	5
Total	NA	110	0	10	10	31	39	3.9	1.3	2.6

As noted in Table I-B.2, the 110-acres of exception areas proposed for inclusion provide a capacity of 20-39 buildable acres, but contain 31 acres of mapped steep slope and natural resource areas and 10 acres of moderate-high visibility areas. Viewed as a ratio, both of these areas provide at least a 1.0 ratio of capacity relative to both visible and constrained areas, and provide a ratio average of over 5 times the average of the areas removed.

The decision to exclude exception areas with scenic, natural and/or historic values reduced potential residential capacity of the proposed UGB by about 12-96 acres, but excludes 511 total acres, including 231 acres of mapped steep slope and natural areas, and 209 acres of moderate-high value scenic areas, from the proposed expansion area.²⁶ As shown on Map 7, the UGB proposal includes exception areas that provide approximately 20-39 buildable acres of residential capacity.

(3) Land designated as marginal land under ORS 197.247.

Wasco County is not a “marginal lands” county and has no lands designated as “marginal lands;” therefore, this priority does not apply.

(4) Land designated for agriculture or forestry in an acknowledged comprehensive plan.

After bringing in higher priority exception areas as required by ORS 197.298(1) to the extent possible while maintaining consistency with the Act, the City must bring in lower priority resource land to meet its obligation under OAR 660, Division 24 to provide a 20-year supply of buildable residential land and suitable employment sites within its 2026 UGB. ORS 197.298(2) requires that:

“higher priority [for inclusion in a UGB] shall be given to land of lower capability as measured by the [U.S. Natural Resources Conservation Service (NRCS) agricultural soil capability classification * * *.”

The Dalles carefully considered impacts on agricultural land when deciding where to expand the UGB. This effort is consistent with the Handbook methodology used to meet Criterion D – “Revision of Urban Area boundaries would not result in the significant reduction of agricultural

²⁶ As indicated earlier, the City’s intent is to reduce impacts on mapped high value NSA resources. The City is willing to include these exception areas if that is requested by Gorge Commission and DLCDC staff.

lands, forest lands, or open spaces” – which is consistent verbatim with Act standard 544b, Sec 4(f)(2)(D).

Most of The Dalles’ Year 2026 land need (457 gross buildable acres) is met by extending the UGB to the eastern (lower) portion of the Hidden Valley area immediately north of the 1983 UGB.

Hidden Valley farming activities are limited to grazing – or there is no farming at all. The area has poor agricultural soils (predominantly Class VI-VIII with small pockets of Class III-IV soils along Hidden Creek) and lacks irrigation. The Hidden Valley area, therefore, is higher priority for inclusion within the UGB than irrigated cherry orchards (with predominantly Class II-IV soils) to the south of the 1983 UGB. These irrigated cherry orchards are also protected under the Act – as high value farm land and for their scenic value.

The Hidden Valley area also includes several existing developed areas that are zoned Agriculture but are not currently in farm use:

- A 41-acre rock quarry²⁷ with protected outer hillsides (GMA A1 (160));
- An 11-acre state shooting range (GMA A1 (160));
- A 6-acre ODOT parcel (GMA A1 (160)); and
- A 92-acre golf course (GMA A2 (20)).

Considering the results of the *Natural Resource Inventory* and the *Scenic Resources Evaluation*, the City:

- Reduced potential visual and rare plant impacts that would otherwise result from UGB expansion, the City used the 20% slope break – rather than the original 25% slope break – to define the western UGB in this area.²⁸
- Further reduced the proposed expansion area to avoid mapped Oak Groves (natural areas) on the western portion of Hidden Valley
- Proposed local protection of some 40 acres of mapped natural areas (Goal 5 riparian areas and wetlands); and
- Proposed a Parks / Open Space (Scenic) designation on 320 acres to protect highly visible (mostly sloped) areas that define the eastern boundary of Hidden Valley.

The remainder of Hidden Valley, approximately 293 gross buildable acres with low or no visibility from KVA, is designated to meet 20-year housing, park, school, and golf course needs.

Although much of the Hidden Valley area is constrained by rocky steep slopes (the same reason it has poor soils), automatic density transfer provisions will ensure that Hidden Valley can be

²⁷ This is area under active quarry use determined via aerial photography. The quarry site totals 199 acres.

²⁸ This decision decreased the buildable area within the UGB, and means that urban development will be confined to flatter, less visible areas within the UGB. Visual impacts from road and building construction will be reduced substantially, because grading (cuts and fills) will not be required to access or construct buildings on highly visible slopes. This decision also benefits rare plant species identified in several steep hillside areas within Hidden Valley. Since rare plants typically survive in areas that have not been disturbed by grazing, and grazing typically occurs in flatter areas, restricting development to slopes of 20 percent or less will have the intended consequence of protecting rare plant communities identified in the *Natural Resource Inventory* and NSA inventories.

efficiently developed at urban densities. Hidden Valley is entirely within the NSA boundary. However, views to Hidden Valley from I-84, SR 14 and the Historic Columbia River Highway are largely obscured by an intervening ridgeline and the edge of the rock quarry. Highly visible portions of this ridgeline and quarry hill are both protected by new CLUP plan designations and policies.

The City also proposes inclusion of two areas zoned for farm use between the quarry and the 1983 UGB (north of Chenoweth Creek). These areas are predominantly Class VI-VIII soils, contain mapped wetlands and low-moderate visibility, and have approximately 67 buildable Medium Density Residential acres and 20 buildable High Density Residential acres.

Goal 14 Locational Considerations

Goal 14 requires that local governments consider the following factors in deciding *where* to expand an urban growth boundary:

- (1) Efficient accommodation of identified land needs*
- (2) Orderly and economic provision of public facilities and services;*
- (3) Comparative environmental, energy, economic and social consequences; and*
- (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.*

(1) Efficient accommodation of identified land needs

Part I of this report describes the key ways that The Dalles has increased overall land use efficiency within the existing 2013 and proposed 2026 UGB:

1. As a result of new measures to increase residential land use efficiency, residential densities in The Dalles are projected to increase by 12 percent – from “actual development” at 5.0 dwellings per gross buildable acre to planned densities of 5.6 dwellings per gross buildable acre (or 7.0 dwelling units per net buildable acre, after accounting for street rights-of-way). Residential efficiency measures have reduced the need for residential land by 65 gross buildable acres.
2. Redevelopment of the Northwest Aluminum site will meet most of the City’s industrial needs for the next 20 years. In addition, the EOA was revised in 2010 based on City Council direction, removing the need for large sites. As a result, The Dalles has a sufficient employment land supply within the existing (2013) UGB to meet Year 2026 employment land needs.
3. The City reduced its proposed UGB expansion area by over 1,400 gross acres – removing low-capacity exception areas, the BPA site, some areas with mapped oak groves, some 20-25% sloped areas, and sites previously proposed for inclusion to meet employment needs.

The location of the 2026 UGB maximizes land use efficiency by confining Year 2026 growth to relatively flat areas adjacent to the 1983 UGB, I-84 and the Columbia River that can be developed at urban densities. The North UGB expansion area also provides suitable sites in proximity to existing transportation corridors and basic employment for needed schools and parks.

Land adjacent to the Columbia Gorge Community College is proposed to allow for efficient expansion of facilities.²⁹ An existing developed school site is also proposed for inclusion within the UGB to meet a forecast 2026 school site need.

The curvilinear configuration of the 1983 UGB also allows for the potential of public transit served by arterial streets that parallel I-84 (e.g., 10th Street and 2nd Street,) which could facilitate transit-oriented development in the future.

(2) Orderly and economic provision of public facilities and services

The Dalles was originally sited on a bench on a bend in the Columbia River. The bench is confined by steep slopes and rimrock. Stream corridors and associated valleys connect the town site with the upland plateau to the south, east and west.

Two relatively flat areas remain near the Columbia River. The eastern area is owned by the Bonneville Power Administration and is not available for urban development. The north area (Hidden Valley) is, for the most part, privately owned and is available for urban development. A third, privately owned, higher elevation bench is located east of the BPA Star Complex in a valley drained by 15 Mile Creek. The only other developable area is located south of the 1983 UGB. This area is has predominately high value, irrigated agricultural soils, and is used for cherry orchards.

In 2007, The Dalles Public Works Department identified major projects necessary to serve the proposed 2026 UGB. The following provides a comparative analysis of extending public facilities in each direction around the UGB.

- **North:** On a relative basis, the cost for providing transportation, sewer, water and storm drainage service to land below the 660-foot water service elevation level to the north of the 1983 UGB are moderate. Moderate costs are based on the need to construct new arterial and collector streets to serve potential UGB expansion areas. However, moderate costs are off-set by the relatively low value grazing land in this area.
- **Southwest and South:** On a relative basis, the cost for providing transportation, sewer, water and storm drainage service to land below the 660-foot water service elevation level to the southwest and south of the 1983 UGB are low. Relatively low costs are based on the proximity of land to existing urban services. However, the areas that are least costly to serve have high value, irrigated cherry orchards.
- **East:** On a relative basis, the cost for providing transportation, sewer, water and storm drainage service to land below the 660-foot water service elevation level to the east of the 1983 UGB are high. High costs are based on distance from the 1983 UGB, and the fact that abutting BPA property will not benefit from or pay for extension of urban services.

²⁹ The City received extensive testimony in public hearings attesting to this need.

Throughout the current phase of the UGB planning work, the Phase I planning issues related to the provision of streets and utilities in the proposed UGB have been reviewed and analyzed. The Public Works Department has determined that the proposed UGB/ Urban Area can be served by connections to the existing road pattern and that the provision of utilities would generally follow the new road system.

However, the Public Works Department has not identified projects necessary to serve areas that cannot feasibly be included with the UGB for topographical or institutional reasons. For example, the City did not identify projects across the Columbia River in Washington State, because the City does not and cannot have jurisdiction across the state line. Nor did the City identify projects for cherry orchards on high value farm land. Aside from strong local opposition from cherry growers, inclusion of such land would be inconsistent with ORS 197.298 priorities for urban growth boundary expansion, and Act standard 544b, Sec 4(f)(2)(D).

The 2013 Public Facilities Plan (PFP) is a comprehensive summary of the City's sanitary sewer, water, storm drainage and transportation projects needed to support planned growth in The Dalles. The PFP contains 2013 project updates to the Sanitary Sewer, Storm Drainage, Transportation³⁰ and Water Master Plans, as well as project lists and maps detailing how The Dalles will serve the existing UGB as well as the proposed 2026 expansion areas.

Full updates to all adopted sewer, water, storm drainage and transportation facility master plans will occur following LCDC and Gorge Commission approval of an expanded UGB / NSA Urban Area.

(3) Comparative economic, social, environmental and energy (ESEE) consequences

To address Locational Factor 3, the City compared the economic, social, environmental and energy consequences of UGB expansion into the study area shown on Maps 2-6. The City's analysis of ESEE consequences also considered the social and environmental impacts that related to The Dalles' location within the Columbia River Gorge NSA – including the results of the 2011 *Natural Resource Inventory, Scenic Resources Evaluation, and Cultural Resources Evaluation*. The ESEE analysis also addresses the NSAA “adverse impact” standards (Act 544b, Sec 4(f)(2)(B & D)).³¹

The NSAA defines terms in 544, Sec 2 Definitions. “Adversely affect” is defined as follows:

As used in sections 544 to 544p of this title, the term –

³⁰ The City did not do a formal TSP update. Rather, collector and arterial street projects, including signalization at key intersections, were added to the existing TSP project list on a tentative basis. When the TSP is updated this transportation project list will be modified accordingly.

³¹ The Handbook indicates that Criterion B (corresponding with Act standard 544b, Sec 4(f)(2)(B)) “is intended to ensure Urban Area boundary revisions do not adversely affect the resources the Commission is required to protect and enhance under the Act.” (p. 5) And that “an analysis that shows a proposed Urban Area boundary revision to be consistent with criterion B should satisfy criterion D as well.” (p. 6) Criterion D corresponds with Act standard 544b, Sec 4(f)(2)(D).

- (a) “adversely affect” or “adversely affecting” means, except as used in section 544m of this title, a reasonable likelihood of more than moderate adverse consequences for the scenic, cultural, recreation, or natural resources of the scenic area, the determination of which is based on –
- (1) The context of a proposed action;
 - (2) The intensity of a proposed action, including the magnitude and duration of an impact and the likelihood of its occurrence;
 - (3) The relationship between a proposed action and other similar actions which are individually insignificant but which may have cumulatively significant impacts; and
 - (4) Proven mitigation measures which the proponent of an action will implement as part of the proposal to reduce otherwise significant affects to an insignificant level.

As indicated in the definition, a resource can be considered “adversely affected” if there is a reasonable likelihood of more than moderate adverse consequences for scenic area resources.

Economic consequences considered below include impacts on The Dalles area employment opportunities, Wasco County’s agricultural economy, and cost of providing urban public facilities.

Comparative Economic Consequences – Employment Opportunities and Agriculture

Part I of this report identified no need to expand the UGB for employment uses. Therefore, comparative economic consequences for expansion of the UGB are primarily related to relative agricultural impacts. For reasons stated below, expansion to the northwest, an area that has relatively low value, non-irrigated grazing land, has the least impact on Wasco County’s agricultural economy.

This analysis assumes that there is a relationship between agricultural soil class and the potential impact on the agricultural economy. As shown on Map 2, relatively flat agricultural land is found to the north and south of the 1983 UGB. However, on an acre-per-acre basis, cherry orchards and associated packing plants (located south of the 1983 UGB) provide the greatest economic benefit to The Dalles’ economy (high value), followed by wheat production (moderate value), and then by grazing activities (low value).³²

- The lowest value agricultural soils are found in the north, which has predominantly non-irrigated Class VI-VII soils adjacent to the 1983 UGB and is used for grazing. This combination of poor soil and lack of irrigation, along with superficial farm use, indicates these agricultural lands are of “low value”. The Hidden Valley area has large, flat sites with access to I-84 and to planned arterial streets (Chenoweth Creek Road) that are suitable for employment uses. This area also has large, flat sites with access to major streets that are suitable for residential, park and school use.
- In contrast, agricultural land adjacent to the 1983 UGB to the southwest and south is comprised primarily of irrigated Class II-IV soils. This area has substantial public

³² The Handbook (p. 7) indicates: “To evaluate the significance of a reduction of agricultural or forest lands or open spaces, it is recommended that the adverse effect standard be used. In the case of agricultural or forest lands, evaluation of adverse effects should consider resources suitability and commercial viability factors.”

(irrigation district) and private (land owner) investments in cherry production. These areas can be characterized as “high value” agricultural resources. Cooperatively owned cherry packing and shipping facilities contribute substantially to The Dalles’ economy. Although these two areas also have large, buildable sites that could meet residential, parks and school needs, inclusion of large tracts of irrigated orchard land within the 2026 UGB would have serious and “adverse” consequences for Wasco County’s agricultural economy.

- Areas to the east of the 1983 UGB contain some irrigated orchard land (“high value”) along 15 Mile Road and large areas of non-irrigated wheat land (predominantly Class II-IV soils, “high” to “moderate” value) located on a higher-elevation bench. Inclusion of this area could meet identified residential, park and school needs, but would have a greater impact on Wasco County’s agricultural economy than expansion to the northwest.

Because The Dalles has identified a need to expand the UGB on to land suitable to meet residential and institutional needs, and suitable land surrounding The Dalles is nearly entirely zoned for agricultural use, The Dalles must include some agricultural land within the 2026 UGB. Land adjacent to the existing UGB to the north has suitable residential and public / semi-public areas that have predominantly Class IV-VIII soils. As indicated above, inclusion of relatively flat land in the north will not “adversely affect” high value farmland, and will have the least impact on Wasco County’s agricultural economy, while providing suitable buildable area for residential development, a community park and schools identified in this report.

The City also recognizes the considerable economic value resulting from maintaining the scenic, recreational, natural and cultural values of the NSA. As noted throughout these findings, the City has substantially modified the 2007 UGB proposal to avoid potential scenic, natural and historic impacts by modifying the Urban Area boundary. The City proposal also includes plan policies and new plan designations to minimize impacts to scenic, natural and cultural resources through the local regulatory process.

Comparative Economic Consequences for Extension of Public Facilities

Public facilities factors are addressed under UGB Locational Factor (2) above. While the cost of extending public facilities are an important factor for The Dalles, the City’s and County’s primary economic concern is to protect existing cherry orchards south of the existing UGB.

Briefly, land adjacent to the UGB to the south and southwest – below the 660-foot elevation level – is the least expensive to serve with sanitary sewer, water, storm drainage and transportation services. Existing streets, sanitary sewer, water and storm drainage facilities can be extended from mostly developed areas within the UGB to serve relatively large and flat parcels adjacent to the UGB. However, ORS 197.298(1) makes irrigated Class II-IV soils the lowest priority for UGB expansion. Therefore, the City included only rural residential exception areas, small developed agricultural parcels, and agricultural parcels with relatively low value agricultural soils within the 2026 UGB.

Land adjacent to the 1983 UGB to the north is somewhat more expensive to serve, primarily because new collector streets must be extended to serve the Hidden Valley area. Because agricultural soils in this area are generally less productive, the City decided to absorb the

relatively higher costs for serving this area to protect cherry orchards to the south and southwest of the UGB.

Land to the east is most expensive to serve, because federal land cannot be expected to pay for extension of sanitary sewer, water and storm drainage facilities to serve development along 15 Mile Road. No UGB expansion is proposed to the east.

In conclusion, while public facilities costs are an important consideration, they do not outweigh economic costs that would result from the loss of public and private investments in irrigated orchard land southwest and south of the existing UGB.

Comparative Social Consequences

Social consequences include the ability to meet affordable housing objectives, create complete neighborhoods, and provide for supporting park and school needs.

Columbia River Gorge National Scenic Area

Social consequences also include social values identified in the Act – particularly cultural resource impacts and scenic views and recreational opportunities that are protected by the Act. However, because the 1983 UGB is completely surrounded by land within the NSA boundary, and additional land is needed to for urban housing, parks and schools, there will be some impacts to scenic, natural and recreational opportunities described in the Act. The proposed 2026 UGB avoids adverse impacts to cultural resources, scenic views, natural areas and recreational opportunities by the following locational decisions and policies:

- Minimizing the need for urban land by increasing residential densities and relying on redevelopment of existing employment areas to meet the City's employment needs.
- Avoiding UGB expansion and urban development in highly visible gateway areas:
 - Along Interstate 84 to the east;
 - East of the Historic Columbia River Highway in the northwest;
 - In the US 197 Canyon to the south; and
 - In the Seven Mile Creek Canyon to the northwest.
- Avoiding UGB expansion into any designated Special Management Area (see Map 2).
- Avoiding UGB expansion into large scenic orchard parcels in the southwest and south.
- Within the 2026 UGB:
 - Protecting existing ridgelines facing the historic Columbia River Highway and I-84 in the north expansion area from future urban development through establishment of a protective Parks / Open Space (Scenic) plan designation;
 - Encouraging urban development of two adjacent rural residential exception areas, thus reducing the need for agricultural lands within the UGB;
 - Protecting highly visible land with slopes of 20 percent or greater in the proposed expansion area from urban development through establishment of a protective Parks / Open Space (Scenic) plan designation;
 - Protecting the existing golf course and its historic club house from inappropriate alteration or conversion to other urban uses through establishment of a protective Parks / Open Space (Scenic) plan designation;

- Protecting Chenoweth, Seven Mile, and Hidden Creeks and their scenic riparian corridors and canyons from future urban development;
- Protecting all mapped wetlands within the proposed expansion area
- Encouraging passive recreational uses and trails within protected riparian corridors and ridgelines to improve recreational access to scenic areas as prescribed in proposed CLUP policies; and
- Establishment of a Cultural Resources Management Plan and implementing Cultural Resources Overlay District, which includes a strategy of evaluation, avoidance, minimization and mitigation for all cultural resources within the proposed expansion area. These draft documents are currently under review by affected tribes.

It is important to note that the cultural resources probability model prepared by Willamette CRA predicts that archeological resource sites are most likely to be located on slopes of less than 25% - that is to say, on buildable land as defined by OAR 660-005. Thus, any buildable land that is brought into the UGB is also more likely to have cultural resources than unbuildable land; the problem, of course, is that unbuildable land does not meet The Dalles' long-term growth needs. For this reason, the CRMP and CRO District require: (a) that a reconnaissance level cultural resource survey be conducted prior to development which involves substantial excavation and for all urban land use decisions; and (b) that a systematic cultural resources survey be conducted in areas identified for further study by the reconnaissance level survey before construction authorized by approved land use decisions or public facilities plans may occur.

Comparative Social Consequences: Housing, Complete Neighborhoods, Schools & Parks

Areas to the north, southwest, and south all provide relatively flat and buildable land – adjacent to the UGB – that are capable of meeting identified residential and public / semi-public needs (park and school facilities). Relatively flat, large and undeveloped sites in these directions also are well-suited to efficient and effective master planning. Because expansion in all of these directions would have access to existing and planned arterial and collector streets, and can be provided with sanitary sewer, water and storm drainage facilities at reasonable costs, land adjacent to the UGB to the north, southwest or south would also provide relatively affordable housing and school opportunities.

However, the positive social consequences associated with inclusion of land in orchard production to the south and southwest are outweighed by the negative economic costs of bringing highly-productive orchard land into the UGB.

The social consequences of bringing in small, developed agricultural parcels to the south and southwest are also positive, because existing homes and businesses in these areas will have access to urban services upon annexation to the City. Relatively low value agricultural land is also provided for expansion of the Columbia Gorge Community College, which provides immense social value to the entire region.

Land to the north, because it includes no irrigated orchard land and otherwise meets identified needs for residential, park and school development, is proposed for inclusion within the 2026

UGB. The Hidden Valley area provides exceptional opportunities for a “complete” and compact master planned community:

- Several parcels in Hidden Valley meet site suitability requirements for community parks and public schools, and therefore will directly meet a portion of the City’s long-term public / semi-public land need.
- The protected Chenoweth Creek and Hidden Creek riparian corridors, combined with the protected scenic vistas and ridgelines within and outside the UGB, create an exceptional setting for compact yet livable residential communities.
- The varied topography in Hidden Valley, including Hidden Creek and protected ridgelines, will also provide passive recreational opportunities for existing and future area residents and visitors.
- The existing golf course, plus its planned expansion areas, will increase recreational and open space opportunities for area residents. Because land near golf courses and protected streams typically has higher value for residential buyers, this area will also provide needed higher end housing opportunities.

In conclusion, expansion to the north provides the only opportunity for The Dalles to provide the amenities required for livable residential neighborhoods – without adverse effect on high value farmland with irrigated cherry orchards. Hidden Valley, like all other areas adjacent to the 1983 UGB, is located within the Columbia Gorge NSA. However, unlike other rural areas outside The Dalles, buildable land within Hidden Valley has low value agricultural soils. The Hidden Valley area also meets residential and public / semi-public land needs identified in Part I of this report by providing:

- Large tracts of buildable land that can accommodate a variety of housing types and densities;
- Suitable sites for a community park and schools; and
- Protected ridgelines and riparian corridors that define compact urban neighborhoods.

Thus, the social consequences of including buildable land adjacent to the UGB to the north are largely positive.

Environmental Consequences

For comparative analysis, the City considered the ESEE consequences of including areas abutting the existing 1983 UGB. Environmental consequences address potential impacts on inventoried natural features (riparian corridors, wetlands and native plant communities) both within and adjacent to UGB, as shown on Map 4, Study Area Natural Resources. To address Statewide Planning Goal 5 (Natural Resources) and Goal 14 Boundary Location Factor 3 (comparative environmental consequences), wetlands, riparian corridors, and habitat for native plant communities were identified and mapped in the 2011 *Natural Resource Inventory*. In addition, to address Goal 7 (Natural Hazards), floodplains and steep slopes were inventoried within the study area. Land with the above constraints generally is not considered to be suitable for meeting identified housing, park, or school needs.

Certain areas with environmental constraints were eliminated from UGB consideration early in the process:

- All NSA Special Management Areas;

- Most General Management Areas, especially those with irrigated agricultural soils, within the NSA boundary;
- Land with slopes of 25 percent or greater;
- Chenoweth and Hidden Creeks and their riparian corridors; and
- Areas predominantly composed of mapped high value natural resources (as identified in the *Natural Resource Inventory*).

In all cases, environmental impacts from urban development will be minimized because the City is committed to providing vegetative buffers along all mapped creeks and their associated riparian corridors. All mapped riparian corridors and wetlands within the UGB expansion area are protected by Comprehensive Plan Goal 5 Policy 7, and Goal 10 Policies 8 and 18. No additional floodplain land outside of protected riparian corridors has been included within the UGB expansion area.

The Natural Resource Inventory identified several rare plant communities to the northwest of the 1983 UGB. Since rare plants typically survive in areas that have not been disturbed by grazing or farming activities, which typically occur in flatter areas, restricting the western UGB to slopes of 20 percent or less will have the intended consequence of avoiding and protecting rare plant communities.³³ Proposed plan policy also commits the city to identifying and protecting rare plant communities through the land development review process.

After completing the *Natural Resource Inventory* and the *Scenic Resources Evaluation* in 2011, the City took a closer look at adjacent rural residential exception areas. Several of the areas proposed for inclusion in 2007 contained substantial areas of mapped natural areas and / or moderately to highly visible areas, and a relatively low capacity for additional residential development. The City decided to exclude these areas – resulting in exclusion of 511 gross acres of rural residential exception area (containing 261 acres of mapped steep slope and natural resource areas and 209 acres of moderate-high visibility scenic resources), but a reduction of only 12-96 acres of buildable residential capacity.³⁴

In conclusion, the 2026 UGB was carefully drawn to exclude inventoried wetlands, floodplains, steep canyons, unbuildable ridgelines and hillside areas, oak grove habitat areas, irrigated cherry orchards, and NSA Special Management Areas. Where wetlands, riparian corridors, high visibility ridgelines and steep slopes are included within the 2026 UGB, they are protected by the proposed Wetland / Riparian Corridor or Parks / Open Space (Scenic) plan designation. Overall, the proposed UGB has positive environmental consequences due to its location and strong policy measures to restrict development within identified natural resource and hazard areas.

³³ To protect these NSA resources, the precise location of rare plants identified in the *Natural Resource Inventory* cannot be provided in public documents.

³⁴ As discussed in Part 1-A and earlier in Part 1-B., The City is willing to bring these exception areas back into the proposed expansion area if Gorge Commission and DLCD staff indicate that inclusion of these areas would better meet State and Federal requirements.

Comparative Energy Consequences

These findings consider the implications of alternative growth patterns on energy conservation. The Dalles CLUP includes a new Goal 13 Energy Conservation chapter that address how energy consumption can be reduced within the proposed UGB.

Due to geographical constraints, development in The Dalles has followed the Columbia River bench in curvilinear urban form. The existing 1983 UGB is approximately 14 miles long, and extends from 1 to 1.5 miles inland from the river – until it reaches rimrock or irrigated orchard land. Although expansion to high value farmland on the southern plateau would result in a more compact, energy-efficient urban growth form, this option is prohibited by ORS 197.298(1) Priorities for urban growth boundary expansion, and NSAA urban area expansion standards. Therefore, the City has no choice but to continue its curvilinear growth pattern by expanding to the north.

However, as noted in The Dalles CLUP, the City's curvilinear urban form does offer some energy conservation opportunities to conserve energy:

- By concentrating employment and housing along major streets (Tenth Street, Second and Third Streets, Chenoweth Creek Road, and I-84) The Dalles transit service becomes feasible over time. A functional public transit system is feasible in the intermediate term (10-20 years), and would have substantial energy conservation benefits.
- Because longer-term growth in The Dalles is severely limited by geography, in the very long term the City will need to consider further intensification of land use along linear transit corridors, which will have longer-term energy conservation benefits.
- The proposed UGB provides large tracts of relatively flat land that can meet the needs of complete communities – with a variety of housing types and densities, community parks and open space, and neighborhood schools. This approach conserves energy by reducing vehicle trip lengths and encouraging alternative modes of transportation.

Solar orientation is also an important long-term consideration. Although buildable areas to the south offer excellent solar access, with a few small exceptions these areas are committed to cherry orchards. Proposed UGB expansion areas in Hidden Valley provide reasonable solar access, although ridgelines to the south and west will provide considerable shading, especially in the winter. Finally, the City considered energy costs related to the provision of public facilities as follows:

- Gravity flow sanitary sewer can serve most of the UGB expansion area, thus reducing energy costs for new pump stations.
- Most land within the proposed UGB is below the 660-foot water service elevation, thus reducing the need for to pump water to new development areas.

ESEE Summary

The City and County carefully considered economic, social, environmental and energy consequences of expanding the UGB within the mapped study area. In summary:

- Residential and public / semi-public land need has been met for the most part on predominantly low value grazing land where necessary, rather than high value, irrigated orchard land – avoiding “adverse” impacts to the NSA and Wasco County’s agricultural economy.
- The UGB has been drawn to minimize scenic and environmental impacts of UGB expansion within the Columbia River Gorge NSA by:
 - Increasing urban residential densities;
 - Relying on redevelopment within the UGB to meet long-term employment needs;
 - Expanding primarily into Hidden Valley, an area with predominantly low visibility;
 - Revising proposed expansion area boundaries to exclude mapped oak grove habitat areas;
 - Removing exception areas that are highly-visible and/or contain a large amount of mapped natural areas that have relatively very low residential capacity;
 - Placing a Park and Open Space designation on nearly all highly visible areas within the proposed expansion area; and
 - Prohibiting urban development on highly visible and sensitive lands within expansion areas (a) on slopes of 20 percent or greater and (b) within protected riparian corridors or mapped resource areas.
- While avoidance of irrigated orchard land to the south continues a curvilinear urban growth form, this form enhances the feasibility of public transit in the intermediate term, with attendant energy conservation benefits.

(4) Compatibility of the proposed urban uses with nearby agricultural activities occurring on farm land outside the UGB.

As shown on Map 7, the 2026 UGB was drawn carefully to minimize impacts on existing agricultural activities outside its expanded boundaries. In almost all cases, the new UGB is defined by (a) existing development, (b) a natural feature, and/or (c) an artificial feature such as a road that provides a buffer between planned urban development and farming activities. Avoiding impact on adjacent farmed areas is consistent with Handbook requirements for meeting Act standard 544b, Sec 4(f)(2)(B).³⁵

North

Farming activity in the proposed north UGB expansion area is limited to grazing, due to generally poor agricultural soils and the lack of irrigation.

- The northern UGB separates future urban development from adjacent A-1 (160) grazing land by:
 - The 20 percent slope break (at the base of the steep, rocky hillside with Class VIII agricultural soils that continue northward beyond the UGB); and
 - An existing developed golf course.

³⁵ “Analysis of potential adverse effects to adjacent or nearby lands or resources should be addressed under criterion “B”.” (Handbook p. 7) “Uses that conflict with agricultural or forest practices or open space resources should not be introduced on adjacent lands. High density residential or commercial development adjacent to resource lands may in some circumstances force farmers and timber managers to curtail accepted management practices that are considered a nuisance.” (Handbook p. 16)

- The western UGB separates future urban development from adjacent A-1 (160) grazing land by:
 - A ridgeline that separates the proposed 2026 urban growth area;
 - A rural residential exception area; and
 - Seven Mile Road and the Seven Mile Creek Canyon.
- The southern UGB separates future urban development from adjacent A-1 (40) agricultural land by:
 - A rural residential exception area; and
 - The Chenoweth Creek Canyon.
- The eastern UGB separates future urban development from adjacent Public Recreational land by:
 - The Historic Columbia River Highway; and
 - An existing manufactured dwelling park.

Southwest

Expansion to the southwest is limited to an existing 12-acre developed school site. Inclusion of this site into the UGB represents no additional impact on agricultural uses.

South

The Dalles' southern UGB generally abuts irrigated farmlands, separated by a ridgeline. Changes to the southern UGB boundary are minor and include one 18-acre developed rural residential exception area, a 9-acre developed church site, and a 32-acre area for expansion of the Columbia Gorge Community College. None of the proposed expansion areas contain irrigated farmland.

Since the rural residential area and the church are already developed, their inclusion would not provide an additional impact on existing farmed areas. Expansion of the community college, while not taking any farmland out of production, might present some additional impacts on surrounding farmed areas when developed. However, institutional development already abuts farm land in this area – without any identified impacts. For this reason, the City finds that the community college is reasonably compatible with activities customarily conducted on farmland surrounding The Dalles, and would not “adversely affect” neighboring high value farmland.

East

No UGB expansion is proposed to the east of the 1983 UGB.

UGB Expansion Conclusion

The City's growth is constrained by topographic features. The Dalles was originally sited on a bench on a bend in the Columbia River. The bench is confined by steep slopes and rimrock before reaching the fertile, irrigated plateau to the south and west. This plateau proved ideal for growing cherries – an industry that is highly valued in Wasco County and protected by Statewide Planning Goal 3 (Agricultural Lands). Less valuable grazing land is found to the north in Hidden Valley. The Bonneville Power Administration owns almost a square mile of land to the east.

When The Dalles established its first UGB in 1982, growth was confined by the Columbia River (to the north and west), BPA (to the east), and cherry orchards (to the south and west). In 1982, planned growth in The Dalles did not justify expansion into lower quality agricultural soils (grazing lands) up the Chenoweth Creek Valley and into Hidden Valley to the northwest. In 1986, the United States Congress adopted the Columbia River Gorge National Scenic Area Act (the Act), which established the bi-state Columbia River Gorge Commission. Under the provisions of the Act, the Gorge Commission established the National Scenic Area surrounding The Dalles UGB on all sides. As intended by Congress, the Gorge Commission exempted the area within The Dalles UGB from provisions of the act.³⁶ However, a “minor amendment” to this “urban exempt area” is required for needed expansion of The Dalles UGB. For the above reasons, The Dalles faces extraordinary topographic and administrative constraints. To address these constraints, The Dalles has done an exceptional job of addressing the need and locational requirements of Statewide Planning Goal 14 and its implementing administrative rule, as well as the stringent requirements of the Act.

To ensure greater efficiency of land use (and thereby reduce the land area added to the 1983 UGB), The Dalles has taken the following measures:

- Planned residential densities have increased from 5.0³⁷ to 5.6 dwelling units per gross buildable acre (or 7 units per net buildable acre). To accomplish this objective, the City has amended its residential zoning districts to allow automatic density transfer, a greater variety of housing types, and minimum densities.
- Rather than meeting large-site industrial needs in “green field” areas to the north, the City has relied on largely on redevelopment of the Northwest Aluminum site.
- Commercial needs are met in neighborhood centers located within the 1983 UGB.
- The City established new goals, policies, and implementation measures with the adoption of the 1993 Comprehensive Land Use Plan update and the 1998 Land Use and Development Ordinance update. These Plan and LUDO updates were specifically directed to increase the efficiency of land use within the UGB.

To minimize impacts on Wasco County’s agricultural land base and on the National Scenic Area, The Dalles has made the following tough decisions regarding the direction of growth:

- The proposed 2026 UGB excludes all irrigated cherry orchards. Like all other areas abutting the UGB, these cherry orchards are within the NSA boundary, but they are the lowest priority for inclusion within a UGB under ORS 197.298, Priorities for urban growth boundary expansion, and high value farmland protected by Act standards.
- The Dalles shrunk the proposed UGB expansion area approximately 1,400 acres (from over 2,500 acres in 2007, to 1,103 acres), primarily to avoid scenic and natural areas mapped in the 2011 *Natural Resource Inventory* and *Scenic Resources Evaluation*. Nearby rural residential exception areas with high amounts of mapped resources and relatively low residential capacity were excluded from the proposed UGB in this effort.
- Rural residential areas with higher residential capacity or without mapped resources are proposed for inclusion within the 2026 UGB in large part because these areas are highest

³⁶ Due to apparent mapping errors, small areas at the edge of The Dalles UGB were not given urban exempt status, and therefore have been required to comply with NSAA scenic standards. This error is being corrected as part of the 1983 UGB amendment process.

³⁷ Actual development densities observed in The Dalles from 2001-2005.

priority for inclusion within a UGB under ORS 197. 298 and they can meet identified growth needs.

- Nearly all of the City's 2026 land need is met by extending the UGB to Hidden Valley to the north. Although Hidden Valley is also within the NSA, this area has relatively poor agricultural soils and lacks irrigation, and therefore is higher priority for inclusion within the UGB than irrigated cherry orchards. Although this area is defined and constrained by rocky steep slopes in some areas (the same reason it has poor soils), automatic density transfer provisions will ensure that this area can be efficiently developed at urban densities.



MAP 1

CITY OF THE DALLES

2007 Buildable Lands Inventory
within 1983 UGB

Legend

- Existing UGB
- Parcels
- Vacant Commercial
- Redevelopable Commercial
- Vacant Industrial
- Redevelopable Industrial
- Vacant Employment
- Redevelopable Employment
- Mixed Use
- Vacant Residential
- Partial Vacant Residential
- Infill Residential

Road Classification

- Arterial
- Collector
- Highway

0 0.1250.25 0.5 Miles



1 inch = 0.41 miles



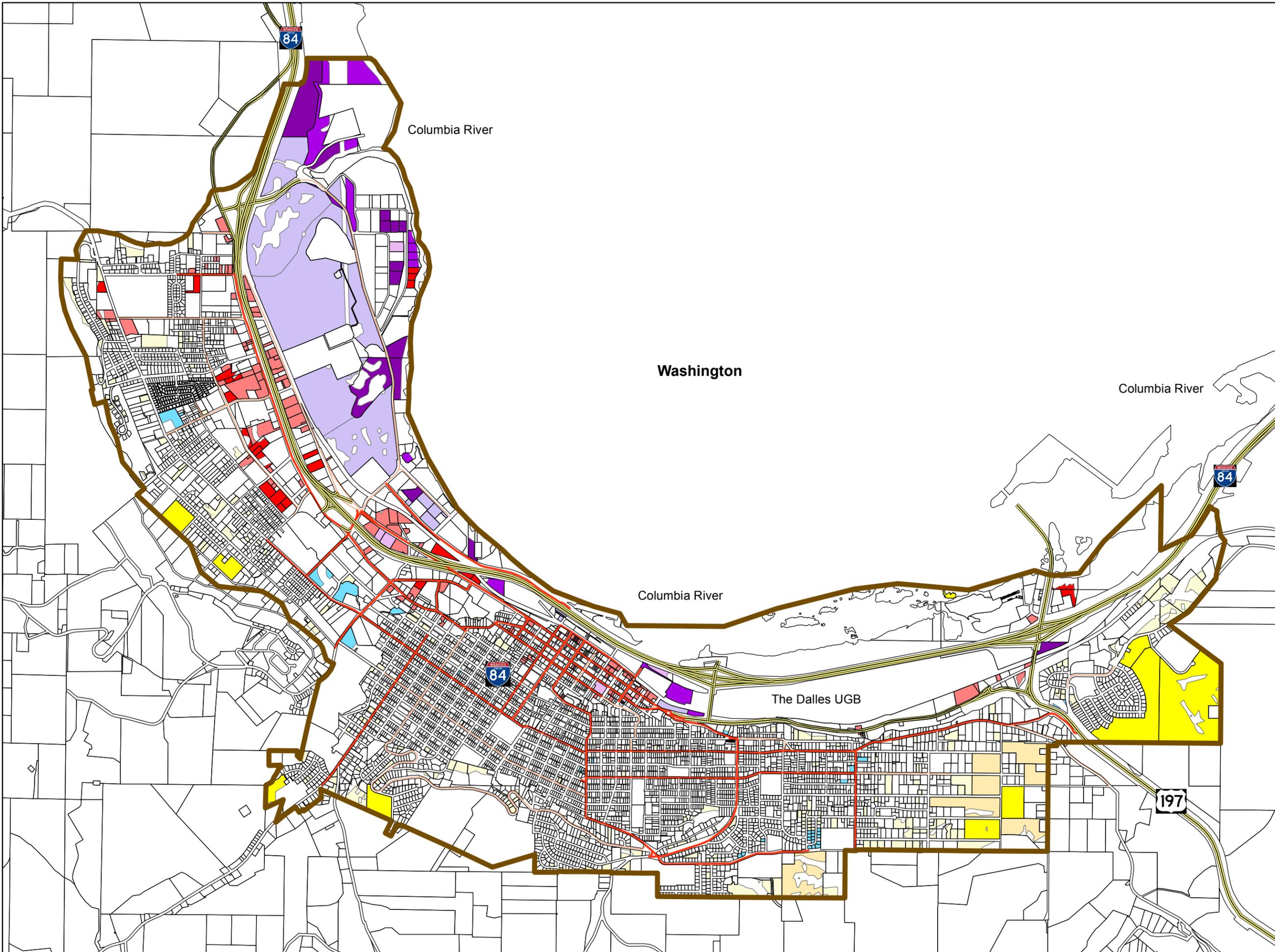
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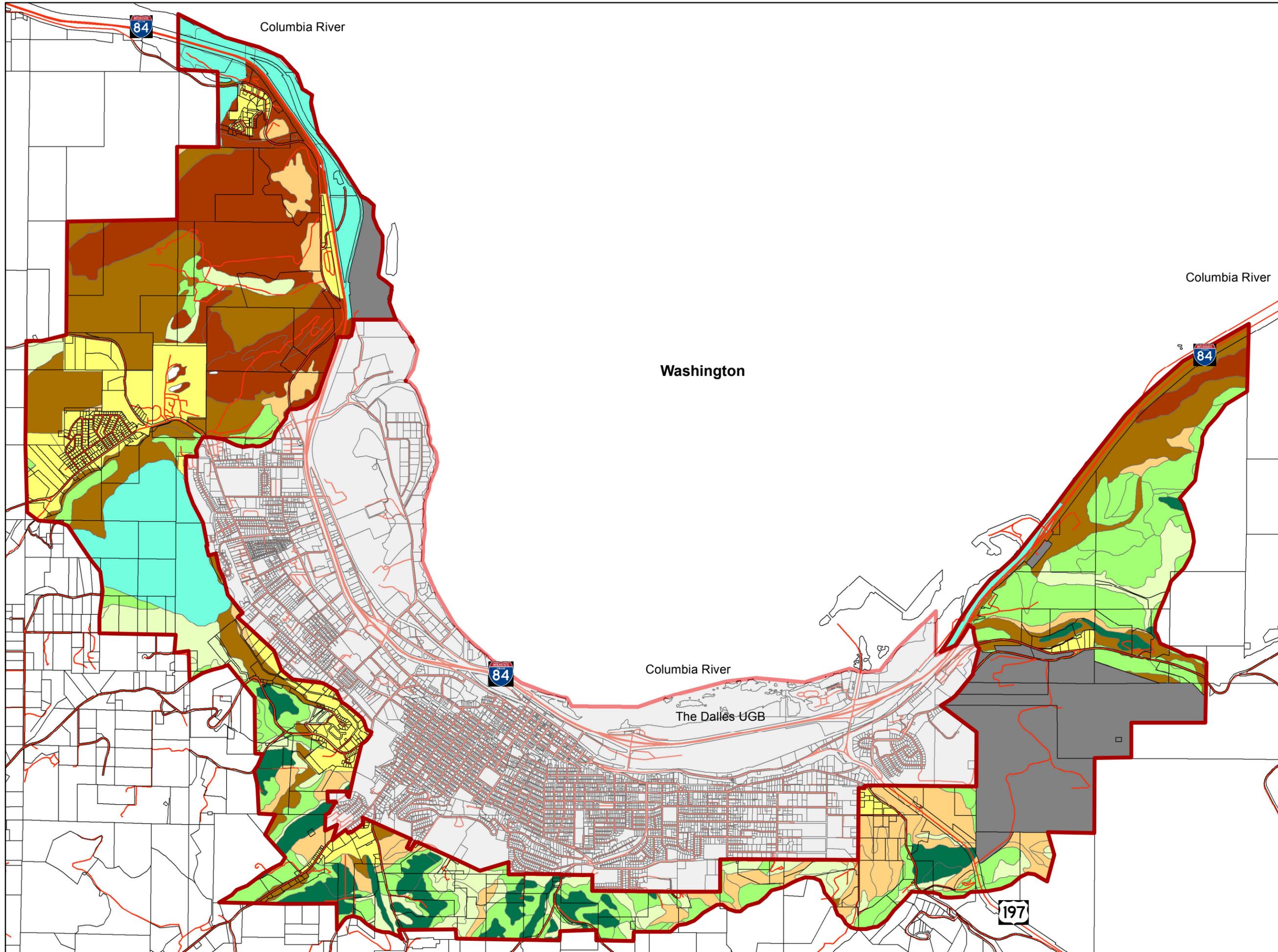
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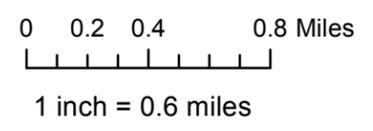




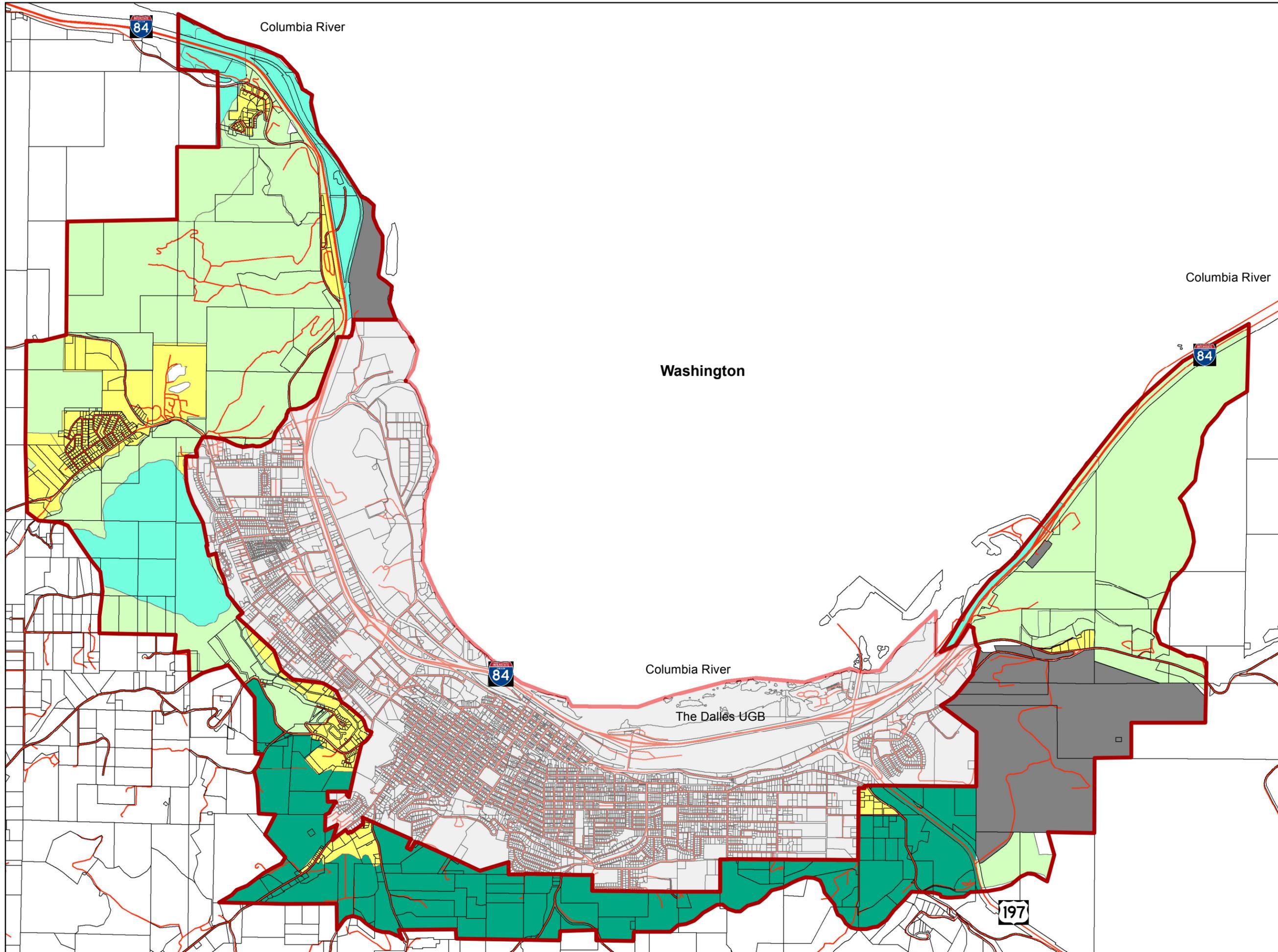
MAP 2
 CITY OF THE DALLES
 2013 UGB Expansion
 Proposal
 Study Area Soil Class,
 Rural Residential Areas,
 and NSA OS / Rec Areas

Legend

- 2010-2013 Study Area
 - Existing UGB
 - Parcels
 - Existing Roads
 - Federal Property
 - NSA Residential
 - NSA OS or Rec Zones
- Soil Class**
- 2
 - 3
 - 4
 - 6
 - 7
 - 8



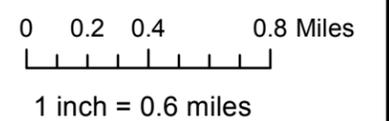
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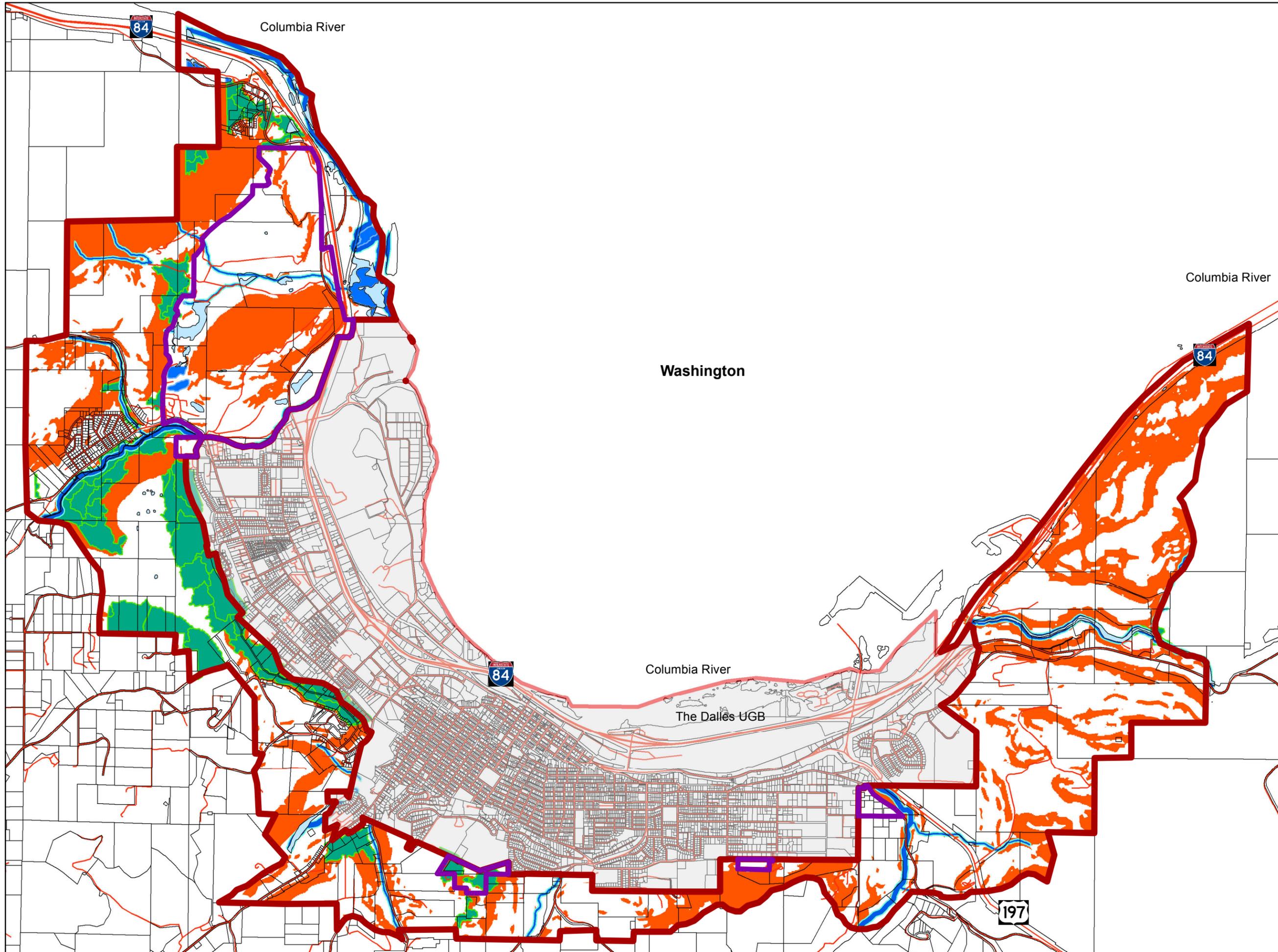
MAP 3
 CITY OF THE DALLES
 2013 UGB Expansion
 Proposal
 Study Area Zoning,
 Irrigation District, and
 Federal Land

Legend

- 2010-2013 Study Area
- Existing UGB
- Parcels
- Existing Roads
- Federal Property
- NSA Residential
- NSA GMA Ag Zones
- NSA Ag & Irrigation District
- NSA OS or Rec Zones



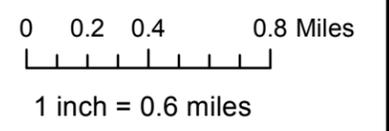
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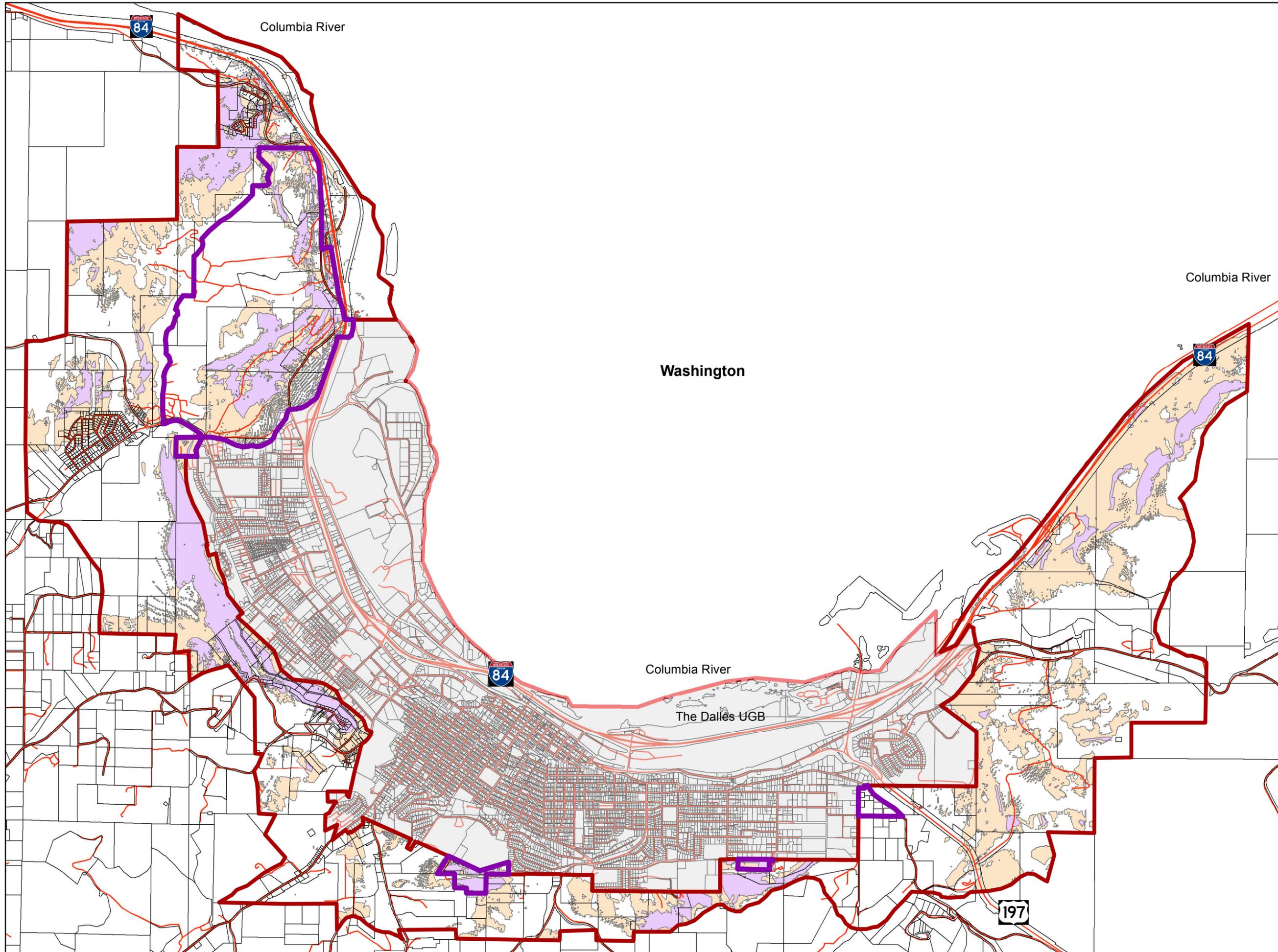
MAP 4
CITY OF THE DALLES
2013 UGB Expansion
Proposal
Natural Features and
Slope Constraints

Legend

-  2013 Expansion Proposal
-  2010-2013 Study Area
-  Existing UGB
-  Parcels
-  Existing Roads
-  Wetlands
-  Riparian Lakes
-  Riparian Streams
-  Oak Grove Habitat
-  25%+ Slope Areas



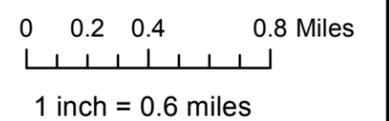
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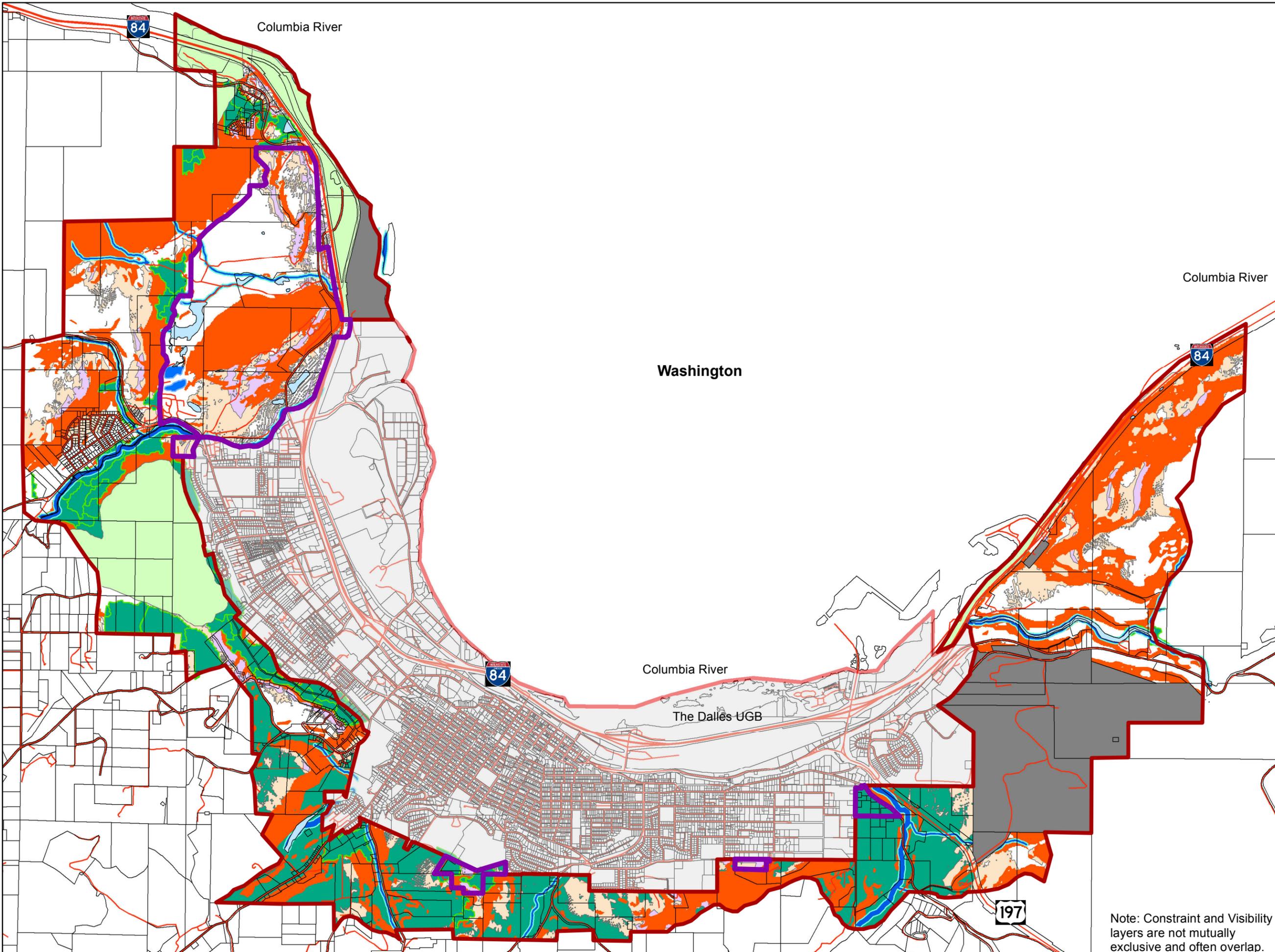
MAP 5
 CITY OF THE DALLES
 2013 UGB Expansion
 Proposal
 Visibility from KVA

Legend

- 2013 Expansion Proposal
- 2010-2013 Study Area
- Existing UGB
- Parcels
- Existing Roads
- ECO Visibility from KVA**
- High
- Moderate

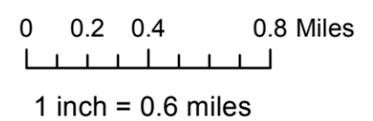


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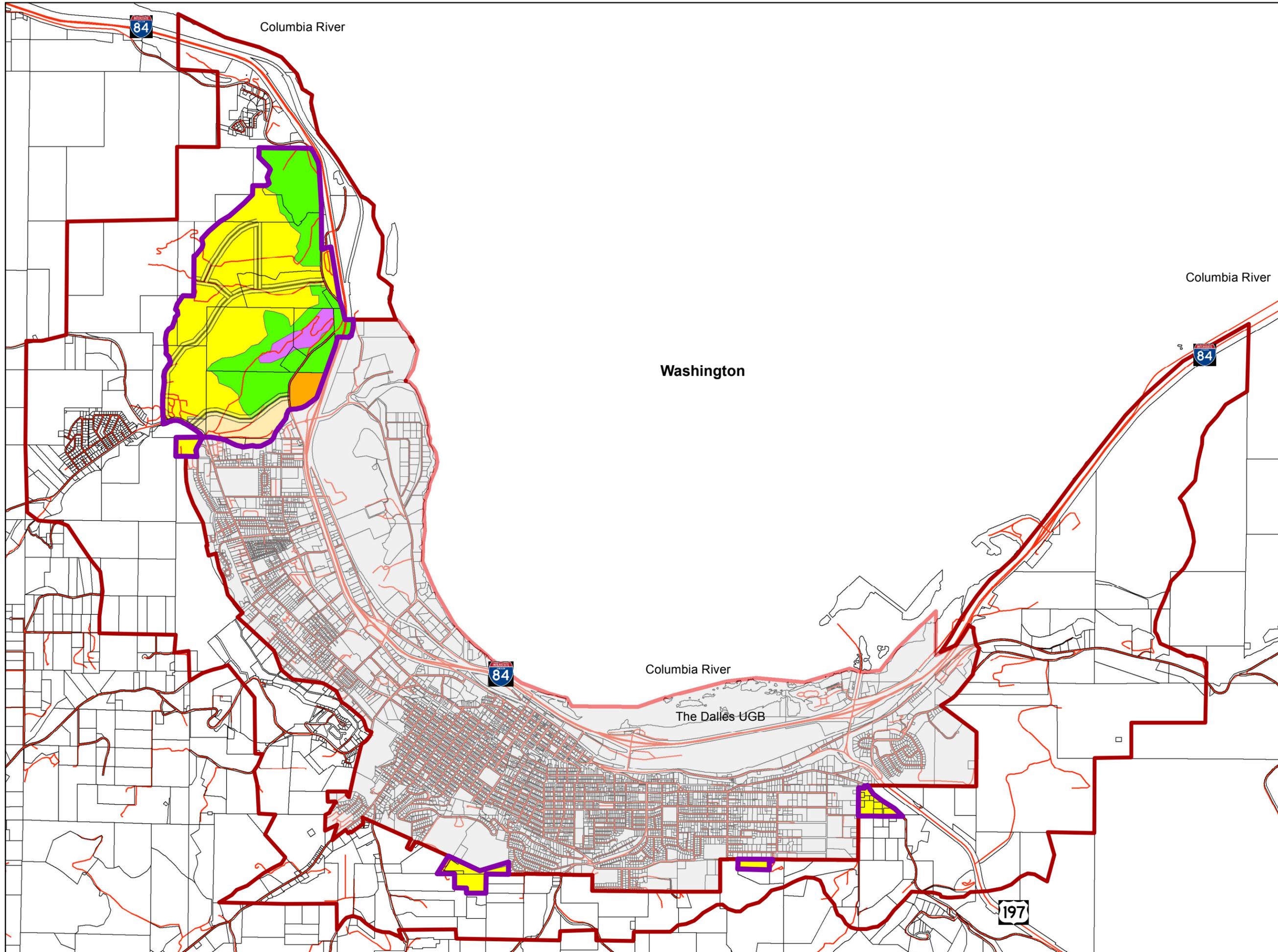
MAP 6
 CITY OF THE DALLES
 2013 UGB Expansion
 Proposal
 Combined Constraints

- Legend**
- 2013 Expansion Proposal
 - 2010-2013 Study Area
 - Existing UGB
 - Parcels
 - Existing Roads
 - Federal Property
 - NSA OS or Rec Zones
 - Wetlands
 - Riparian Lakes
 - Riparian Streams
 - Oak Grove Habitat
 - 25%+ Slope Areas
 - Irrigation District
- ECO Visibility from KVA**
- High
 - Moderate



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Note: Constraint and Visibility layers are not mutually exclusive and often overlap.



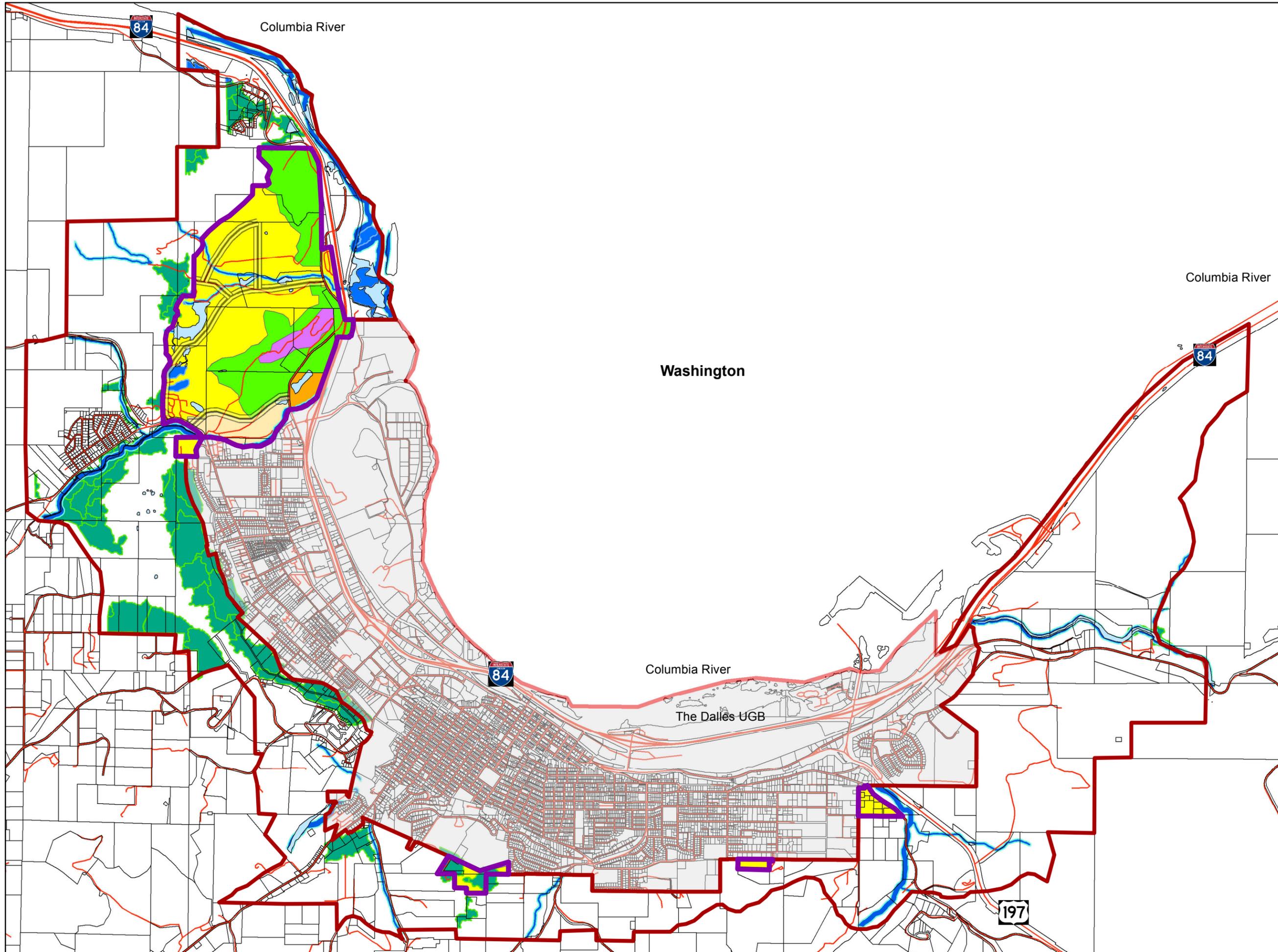
MAP 7
 CITY OF THE DALLES
 2013 UGB Expansion
 Proposal
 Expansion Areas
 Comprehensive Plan

- Legend**
- 2013 Expansion Proposal
 - 2010-2013 Study Area
 - Existing UGB
 - Parcels
 - Expansion Area Roads
 - Existing Roads
- Expansion Area Plan**
- High Density Residential
 - Medium Density Residential
 - Residential
 - Industrial
 - Parks Open Space

0 0.2 0.4 0.8 Miles
 1 inch = 0.6 miles



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MAP 8
 CITY OF THE DALLES
 2013 UGB Expansion
 Proposal
 Comprehensive Plan and
 Natural Resources

Legend

- 2013 Expansion Proposal
 - 2010-2013 Study Area
 - Existing UGB
 - Parcels
 - Expansion Area Roads
 - Existing Roads
 - Wetlands
 - Riparian Lakes
 - Riparian Streams
 - Oak Grove Habitat
- Expansion Area Plan**
- High Density Residential
 - Medium Density Residential
 - Residential
 - Industrial
 - Parks / Open Space (Scenic)

0 0.2 0.4 0.8 Miles
 1 inch = 0.6 miles



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