



2024 Compliance Report

January 13, 2025

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Executive Summary

Metro Code Chapter 3.07 (the “Urban Growth Management Functional Plan” or “UGMFP”) and Chapter 3.08 (the “Regional Transportation Functional Plan” or “RTFP”) provide standards, tools, and guidance for local land use plans, transportation system plans, and implementing regulations that are necessary to advance the regional vision, goals, and policies of Metro’s Regional Framework Plan and the 2040 Growth Concept.

As required annually by Metro Code Subsection 3.07.870(a), the 2024 Compliance Report summarizes the status of compliance with the UGMFP for each city and county in the region.¹ To better connect land use planning with transportation planning, this report also includes information on local government compliance with the RTFP.

All jurisdictions are in compliance with the UGMFP, with the exception of a few jurisdictions that continue to work to satisfy UGMFP Title 11 requirements related to planning for areas previously added to the urban growth boundary (UGB). All jurisdictions are in compliance with their respective RTFP requirements.

Per the Metro Code and if requested, the Chief Operating Officer (COO) may grant formal extensions to deadlines for meeting UGMFP requirements if a local government meets one of two criteria: the city or county is making progress towards compliance; or there is good cause for failure to meet the deadline for compliance. In 2024, there were no requests for extensions of compliance dates for the UGMFP. Nonetheless, this report notes that progress is being made by cities and counties to address listed deficiencies.

Similarly, per the Metro Code, the COO may grant formal exemptions to meeting RTFP requirements if the COO finds the following: the city or county’s transportation system is generally adequate to meet transportation needs; little population or employment growth is expected over the period of the exemption; the exemption would not make it more difficult to accommodate regional or state transportation needs; and the exemption would not make it more difficult to achieve the performance objectives set forth in Section 3.08.010(A) of the RTFP. The COO received and granted requests for exemption from the RTFP requirements from two cities – Durham and Maywood Park. The COO determined Johnson City and Rivergrove were also eligible for exemption from the RTFP requirements and granted exemptions to both cities. The duration of all four exemptions is for 10 years, until December 31, 2034.

The following page describes the four appendices included in this compliance report.

¹ Metro Code Subsection 3.07.870(a) requires Metro’s COO to submit the report to the Metro Council by March 1 and to send a copy of the report to MPAC, JPACT, PERC, and each city and county within Metro.

Appendix A summarizes the compliance status for all local governments with each title of the UGMFP, as of December 31, 2024.

Appendix B provides further details on the status of compliance with UGMFP Title 11 new urban area planning for areas added to the UGB since 1998, as of December 31, 2024. During 2024, Beaverton came in to compliance with their Title 11 requirements for comprehensive planning of the Cooper Mountain 2018 UGB expansion area.

Appendix C summarizes local jurisdictions' compliance with the RTFP, as of December 31, 2024.

Appendix D is the report required by Metro Code Subsection 3.07.450(k) on amendments made in 2024 to the UGMFP Title 4 Employment and Industrial Areas Map (also known as the "Industrial and Other Employment Areas Map" and the "Title 4 Map").²

² Subsection 3.07.450(k) requires the COO to submit a written report to the Metro Council and MPAC by January 31 of each year on the cumulative effects on employment land in the region of the amendments made to the Title 4 Map the preceding year. The report must include any recommendations the COO deems appropriate on measures the Council might take to address the effects.

APPENDIX A
Summary of Urban Growth Management Function Plan (UGMFP)
Compliance Status as of December 31, 2024

| City/ County | Title 1 Housing Capacity | Title 3 Water Quality and Flood Management | Title 4 Industrial and other Employment Land | Title 6 Centers, Corridors, Station Communities and Main Streets | Title 7 Housing Choice | Title 11 Planning for New Urban Areas (See Appendix B for details) | Title 13 Nature in Neighborhoods |
|-------------------------|-----------------------------------------|---------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------|-------------------------------------------------|
| Beaverton | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Cornelius | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Durham | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Fairview | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Forest Grove | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Gladstone | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Gresham | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Happy Valley | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Hillsboro | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Johnson City | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| King City | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Lake Oswego | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Maywood Park | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Milwaukie | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Oregon City | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Portland | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Rivergrove | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Sherwood | In compliance | In compliance | In compliance | In compliance | In compliance | Not in compliance | In compliance |
| Tigard | In compliance | In compliance | In compliance | In compliance | In compliance | Not in compliance | In compliance |
| Troutdale | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Tualatin | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| West Linn | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Wilsonville | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance | In compliance |
| Wood Village | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Clackamas County | In compliance | In compliance | In compliance | In compliance | In compliance | Not in compliance | In compliance |
| Multnomah County | In compliance | In compliance | In compliance | In compliance | In compliance | Not applicable | In compliance |
| Washington County | In compliance | In compliance | In compliance | In compliance | In compliance | Not in compliance | In compliance |

APPENDIX B
Status of Compliance with UGMFP TITLE 11, *Planning for New Urban Areas,*
as of December 31, 2024

| Project | Lead Government(s) | Compliance | Status |
|----------------------------------------|---------------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1998 UGB Expansion | | | |
| Rock Creek | Happy Valley | Yes | Planning completed; mostly annexed and developed |
| Pleasant Valley | Gresham, Happy Valley, Portland | Yes | Planning completed; a portion annexed by each city, with limited development occurring |
| 1999 UGB Expansion | | | |
| Witch Hazel | Hillsboro | Yes | Planning completed; majority annexed and developed |
| 2000 UGB Expansion | | | |
| Villebois Village | Wilsonville | Yes | Planning and annexation completed; development almost complete |
| 2002 UGB Expansion | | | |
| Springwater | Gresham | Yes | Planning completed; some limited annexations and development |
| Damascus/Boring | Happy Valley | Yes | Happy Valley portion: Planning completed; development ongoing |
| | Clackamas County, Happy Valley | No | Former City of Damascus land area: Happy Valley adopted a Title 11 compliant comprehensive plan (Pleasant Valley / North Carver Comprehensive Plan) for approximately 2,700 acres of the area, and the County and the City have an Urban Growth Management Agreement for the City to do comprehensive planning for additional portions of the area |
| | Gresham | Yes | Gresham portion: Kelley Creek Headwaters Plan completed; some limited annexations and development |
| Park Place | Oregon City | Yes | Planning completed; portion annexed and waiting development |
| Beavercreek Rd | Oregon City | Yes | Planning completed; portion annexed and waiting development |
| South End Rd | Oregon City | Yes | Planning completed; waiting annexation and development |
| East Wilsonville (Frog Pond West) | Wilsonville | Yes | Planning completed; mostly annexed, with development ongoing |
| NW Tualatin (Cipole Rd and 99W) | Tualatin | Yes | Planning completed; waiting annexation and development |
| SW Tualatin | Tualatin | Yes | Planning completed; waiting annexation and development |
| Brookman Rd | Sherwood | Yes | Refinement plan completed; annexation and development ongoing |
| West Bull Mountain (River Terrace 1.0) | Tigard | Yes | <i>See Roy Rogers West (River Terrace 1.0) with 2011 expansion</i> |
| Study Area 59 | Sherwood | Yes | Planning and annexation completed; development almost complete |
| Study Area 61 (Cipole Rd) | Sherwood | No | Extension to 12/31/2021 expired; City staff working to complete project |
| 99W Area (near Tualatin-Sherwood Rd) | Sherwood | Yes | Planning completed; partially annexed and developed |

APPENDIX B (continued)
Status of Compliance with UGMFP TITLE 11, *Planning for New Urban Areas,*
as of December 31, 2024

| Project | Lead Government(s) | Compliance | Status |
|----------------------------------------------------|---------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| North Cooper Mountain | Washington County | No | Preliminary planning completed by City of Beaverton in conjunction with Washington County; Future discussions of comprehensive and urban services planning will be informed by Beaverton's Cooper Mountain Community plan and its related Cooper Mountain Utility Plan |
| Study Area 64 (14 acres north of Scholls Ferry Rd) | Beaverton | Yes | Planned, annexed, and developed |
| Study Areas 69 and 71 | Hillsboro | Yes | Planning completed as part of South Hillsboro; portion annexed and developed |
| Study Area 77 | Cornelius | Yes | Planning and annexation completed; small portion developed |
| Forest Grove Swap | Forest Grove | Yes | Planned, annexed, and developed |
| Shute Road | Hillsboro | Yes | Planning and annexation completed; majority developed |
| North Bethany | Washington County | Yes | Planning completed; majority developed |
| Bonny Slope West (Area 93) | Washington County | Yes | Planning completed; development ongoing |
| 2004/2005 UGB Expansion | | | |
| Damascus area | Clackamas County | See 2002 above | <i>See Damascus/Boring 2002 expansion above</i> |
| Tonquin | Sherwood | Yes | Planning completed; portion annexed, with development ongoing |
| Basalt Creek / West RR Area | Tualatin, Wilsonville | Yes | Planning completed; some limited annexation; waiting further annexations and development |
| North Holladay | Cornelius | Yes | Planning completed; waiting annexation and development |
| Evergreen | Hillsboro | Yes | Planning completed; majority annexed, with development ongoing |
| Helvetia | Hillsboro | Yes | Planning completed; majority annexed, with development ongoing |
| 2011 UGB Expansion | | | |
| North Hillsboro | Hillsboro | Yes | Planning completed; annexation and development ongoing |
| South Hillsboro | Hillsboro | Yes | Planning completed; annexation and development ongoing |
| South Cooper Mountain | Beaverton | Yes | Planning and annexation completed; development ongoing |
| Roy Rogers West (River Terrace 1.0) | Tigard | Yes | Planning completed; annexation and development ongoing |

APPENDIX B (continued)
Status of Compliance with UGMFP TITLE 11, *Planning for New Urban Areas*,
as of December 31, 2024

| Project | Lead Government(s) | Compliance | Status |
|-----------------------------------------|---------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2014 UGB Expansion (HB 4078) | | | |
| Cornelius North | Cornelius | Yes | Planning completed; small portion annexed and developed |
| Cornelius South | Cornelius | Yes | Planning completed; mostly annexed, with development ongoing |
| Forest Grove (Purdin Rd) | Forest Grove | Yes | Planning completed; about half annexed and small portion developed |
| Forest Grove (Elm St) | Forest Grove | Yes | Planning and annexation completed; waiting development |
| Hillsboro (Jackson East) | Hillsboro | Yes | Planning and some annexations completed; waiting further annexations and development |
| 2018 UGB Expansion | | | |
| Cooper Mountain | Beaverton | Yes | Comprehensive planning expected to be completed in 2024 |
| Witch Hazel Village South | Hillsboro | Yes | Planning completed; waiting annexation and development |
| Beef Bend South (Kingston Terrace) | King City | Yes | Planning completed; waiting annexation and development |
| Advance Road (Frog Pond East and South) | Wilsonville | Yes | Planning completed; waiting annexation and development |
| 2023 UGB Amendment ("Exchange") | | | |
| River Terrace 2.0 | Tigard | No | Planning expected to be completed in 2026 |
| 2024 UGB Expansion | | | |
| Sherwood West | Sherwood | N/A | UGB expansion in Ordinance No. 24-1520 not effective until at least March 2025; no comprehensive planning requirements until the expansion is effective |

APPENDIX C
Summary of Regional Transportation Functional Plan (RTFP)
Compliance Status as of December 31, 2024

| City/County | Title 1 Transportation System Design | Title 2 Development and Update of Transportation System Plans | Title 3 Transportation Project Development | Title 4 Regional Parking Management | Title 5 Amendment of Comprehensive Plans |
|--------------------|-----------------------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------|----------------------------------------------------|---------------------------------------------------------|
| Beaverton | In compliance | In compliance | In compliance | In compliance | In compliance |
| Cornelius | In compliance | In compliance | In compliance | In compliance | In compliance |
| Durham | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 |
| Fairview | In compliance | In compliance | In compliance | In compliance | In compliance |
| Forest Grove | In compliance | In compliance | In compliance | In compliance | In compliance |
| Gladstone | In compliance | In compliance | In compliance | In compliance | In compliance |
| Gresham | In compliance | In compliance | In compliance | In compliance | In compliance |
| Happy Valley | In compliance | In compliance | In compliance | In compliance | In compliance |
| Hillsboro | In compliance | In compliance | In compliance | In compliance | In compliance |
| Johnson City | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 |
| King City | In compliance | In compliance | In compliance | In compliance | In compliance |
| Lake Oswego | In compliance | In compliance | In compliance | In compliance | In compliance |
| Maywood Park | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 |
| Milwaukie | In compliance | In compliance | In compliance | In compliance | In compliance |
| Oregon City | In compliance | In compliance | In compliance | In compliance | In compliance |
| Portland | In compliance | In compliance | In compliance | In compliance | In compliance |
| Rivergrove | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 | Exempt until 12/31/2034 |
| Sherwood | In compliance | In compliance | In compliance | In compliance | In compliance |
| Tigard | In compliance | In compliance | In compliance | In compliance | In compliance |
| Troutdale | In compliance | In compliance | In compliance | Exception | In compliance |
| Tualatin | In compliance | In compliance | In compliance | In compliance | In compliance |
| West Linn | In compliance | In compliance | In compliance | In compliance | In compliance |
| Wilsonville | In compliance | In compliance | In compliance | In compliance | In compliance |
| Wood Village | In compliance | In compliance | In compliance | In compliance | In compliance |
| Clackamas County | In compliance | In compliance | In compliance | In compliance | In compliance |
| Multnomah County | In compliance | In compliance | In compliance | In compliance | In compliance |
| Washington County | In compliance | In compliance | In compliance | In compliance | In compliance |

APPENDIX D

Date: January 13, 2025
To: Metro Council and the Metro Policy Advisory Committee (MPAC)
From: Marissa Madrigal, Chief Operating Officer
Subject: Annual report on amendments to UGMFP Title 4 Map

Background

Title 4, *Industrial and Other Employment Areas*, of the Urban Growth Management Functional Plan (UGMFP) seeks to improve the region's economy by protecting a supply of sites for employment with requirements for local jurisdictions to limit the types and scale of certain non-industrial uses in designated Regionally Significant Industrial Areas, Industrial Areas, and Employment Areas. Designated areas are officially depicted on the UGMFP's "*Title 4 Industrial and Other Employment Areas Map*" (i.e., the "Title 4 Map").

Title 4 requires that Metro's Chief Operating Officer (COO) submit a written report to the Metro Council and MPAC by January 31 of each year on the cumulative effects on employment land in the region of amendments to the Title 4 Map during the preceding calendar year. This memo constitutes the report on map amendments made in 2024.

Cumulative effects of Title 4 Map amendments in 2024

There were no amendments to the Title 4 Map in 2024 that were made effective in 2024.

On December 5, 2024, the Metro Council approved Ordinance No. 24-1520 to expand the urban growth boundary (UGB) to include the roughly 1,200-acre Sherwood West urban reserve. The ordinance also amends the Title 4 Map to apply an 'Industrial Area' designation to approximately 275 acres of the expansion area. Acknowledgement of the UGB expansion by the Land Conservation and Development Commission is pending, and the Title 4 Map will not be formally updated until after Ordinance No. 25-1520 becomes effective.

Future UGMFP and Title 4 Map updates

On January 9, 2025, the Metro Council held a public hearing on Ordinance No. 25-1522, which proposes to amend the Title 4 Map for the Montgomery Park neighborhood of the City of Portland. If adopted by the Metro Council, the ordinance will remove approximately 59 acres of Title 4 designations in the neighborhood in support of the City's locally adopted 'Montgomery Park Area Plan' and to advance policies of Metro's Regional Framework Plan.

A 'future vision' effort that takes a fresh look at the 2040 Growth Concept would offer an opportunity for Metro Council consideration of industrial land policy and regulatory updates, including an update of the Title 4 program and the Title 4 Map.