

STAFF REPORT

TYPE IV HEARING: COMPREHENSIVE PLAN AMENDMENT

Development Code Process Update (DCPU), Phase 2

TO: Gresham Planning Commission

FROM: Joshua Williams, Senior Development Planner
Terra Wilcoxson, Comprehensive Planning Manager

HEARING DATE: December 8, 2025

REPORT DATE: November 28, 2025

FILE NUMBER: CPA-25-00460

PROPOSAL: To adopt Comprehensive Plan text and map amendments to Volume 3 (Development Code) of the Gresham Community Development Plan (GCDP). The amendments update language to ensure clear and objective standards for residential development and for compliance with State law; reorganize, reformat, and update standards and guidelines in the Downtown, Civic, Corridor and Rockwood Design Districts for ease of use, clarity, and consistency; update definitions and code language throughout the Development Code for consistency and to remove repetitive or out-of-date language and standards; update thresholds for Design Review; update the review process for Accessory Dwellings, and update terminology and standards in Public Facilities requirements.

EXHIBITS: Proposed Comprehensive Plan (GCPD) Text Amendments:

- A. Draft Section 4.1100 Downtown Plan Design District
- B. Draft Section 4.1200 Civic Neighborhood Plan District
- C. Draft Section 7.0100 Corridor Design District
- D. Draft Section 7.0500 Rockwood Design District
- E. Draft Appendix 5 Public Facilities
- F. Council Bill

RECOMMENDATION: Staff recommends **adoption** of the proposed Comprehensive Plan text amendments, CPA-25-00460, as contained in the attached exhibits, based on the findings, conclusions, and recommendations in the November 28, 2025, staff report.

SECTION I. EXECUTIVE SUMMARY

The Development Code Process Update (DCPU) Phase 2 represents a significant update to the Gresham Community Development Code (GCDC). This package of code amendments is designed to streamline the development review process, reduce barriers for housing production, and ensure compliance with recent State housing legislation. By updating outdated or inconsistent and confusing language and reformatting the design district guidelines and standards, the proposed code amendments aim to make the GCDC more user-friendly for applicants, staff, and the public.

The proposed amendments focus on three primary objectives:

- **Regulatory compliance:** Ensuring all standards for residential development are “clear and objective” as required by ORS 197A.400, and implementing State housing statutes regarding occupancy, single room occupancies (SROs), and manufactured housing.
- **Process efficiency:** Reducing review times and costs for smaller, less complex projects by expanding administrative (Type I) review thresholds and removing unnecessary pre-application meetings for some types of small-scale development.
- **Code modernization:** Eliminating redundancies, updating definitions, and harmonizing design standards across the City’s design districts.

To achieve these goals, the proposal includes amendments to Volume 3 of the Community Development plan, categorized as follows:

Housing Production and Variety

- **Accessory Dwelling Units (ADUs):** the review process for ADUs is proposed to change from a Type II land use review to a Type I administrative review, processed concurrently with the building permit.
- **Shared Housing:** A new “Shared Housing Facility” land use classification is introduced to regulate group living uses consistent with multi-family residential development.
- **Middle Housing Standards:** Standards for townhouse and cottage cluster developments are refined to ensure high-quality site design while meeting state mandates for clear and objective regulations.
- **Open Space and Housing Variety:** The recently adopted Pleasant Valley Plan District residential open space and housing variety standards are included for residential development in other sections of the GCDC

Modernizing Design Districts

- **Repeal and Replace:** The design manuals for Downtown and Civic and the code sections for Corridor and Rockwood Design Districts are proposed to be repealed and replaced to facilitate extensive formatting and content updates.

- **Improved Usability:** The Downtown Design standards and guidelines are reorganized into a two-column format; and residential standards are introduced into the Rockwood Design District for ease of use and better internal consistency.
- **Review Thresholds:** the proposal increases the number of discretionary design guidelines allowed (from three to five) before a project is elevated to a Type III Design Commission hearing, allowing more projects to be processed at the staff level.

Infrastructure and Technical Updates

- **Public Facilities (Appendix 5):** This section includes updates to align with current Public Works standards and terminology.
- **Commercial Corridors:** To reflect current market realities, the requirement for ground-floor commercial space has been reduced in specific Corridor Districts.
- **Definitions and Procedures:** Updates throughout the code clarify or remove unused definitions and standardize the naming conventions for public rights-of-way (e.g., paths and trails) and private on-site circulation.

Community Engagement and Involvement

Community engagement took place throughout the project, with different types of outreach needed at different times. General feedback on preferences for open space and building elements was sought through participation in outreach events and discussion with attendees. More technical feedback on specific code language and policies was sought through the City Council, Planning Commission, Design Commission, Developer Advisory Group, and the Neighborhood Coalition. Staff also maintained a DCPU project page on the EngageGresham.org web site with a summary of the project, including project goals and status; and the opportunity to post comments or contact staff for more information.

Outreach occurred in two phases, each with a different focus to support the project goals. Staff has incorporated input from community members, local development professionals, Design Commission, Planning Commission, and City Council into the code updates.

- The initial phases of outreach introduced the project goals and were primarily opportunities to hear from residents, developers, and members of the Planning Commission and Design Commission about development in the community and what aspects of the development code could be improved.
- The second phase of outreach involved discussion of specific changes to standards in the Development Code, including multiple work sessions with the Neighborhood Coalition and the Design Commission throughout 2025. Larger policy discussions, including a focus on land use, compliance with State legislation, and design review thresholds were held with the Planning Commission and City Council at work sessions during the Summer of 2025.
- Engagement activities included the following:

- Rock the Block – August 23-24, 2024
- Design Commission – September 4, 2024
- Planning Commission – September 23, 2024
- Development Advisory Group – September 24, 2024
- Cross-Cultural Engagement Sessions (hosted in partnership with Latino Network and ARISE and Shine) – October 15 and October 29, 2024
- Neighborhood Coalition – November 12, 2024
- Design Commission – December 4, 2024
- Design Commission – January 29, 2025
- Neighborhood Coalition – February 10, 2025
- Design Commission – February 19, 2025
- Neighborhood Coalition – March 10, 2025
- Planning Commission – May 12, 2025
- City Council Work Session – June 3, 2025
- Design Commission – August 20, 2025
- Neighborhood Coalition – November 17, 2025
- Developer Advisory Group – December 3, 2025

The following required notices were sent for the project:

- Notice of the Development Code changes were sent to the Department of Land Conservation and Development (DLCD) and Metro on November 3, 2025, complying with the requirement to provide such notice at least 35 days before the first evidentiary hearing. Notice of the December 8, 2025, Planning Commission hearing was published in the Gresham Outlook on November 19, 2025. Notice of the January 6, 2026, City Council hearing will be published in the Gresham Outlook no later than December 26, 2025. A Measure 56 notice is not required for this comprehensive plan amendment.

Public Comment

As of the date of this report no public comments were received.

Proposed Comprehensive Plan Amendments Overview

The overview provided below summarizes the changes proposed to the Gresham Community Development Plan (GCDP). The plan consists of three volumes—Volume 1 “Findings”, Volume 2 “Policies”, Volume 3 “Development Code”. Updates are proposed to Volume 3. The full text of the proposed updates is provided in the draft Council Bill (formatted in ~~strikeout~~/underline), Exhibit ‘A’, Exhibit ‘B’, Exhibit ‘C’, Exhibit ‘D’, and Exhibit ‘E’.

The following code amendments are proposed:

3.0100 Definitions. The proposed amendments in this section primarily support other code changes. For example, a definition for “Shared Housing Facility” was created to help clarify residential uses in land use districts across Gresham. This term will now appear in the use tables for each land use district. Other edits were made to support use of consistent terminology throughout code or to provide clarification. Additionally, some terminology was removed either because it was no longer used in code or because there was no need to define it in the context of this document.

3.0200 Land Use Classifications. The proposed amendments in this section clarify uses. For example, shared housing facilities are described beyond the definition proposed in Section 3.0100 and are classified as multi-family housing. Additionally, a change is proposed to clarify that accessory dwellings may only be accessory to single detached dwellings and not middle housing. Other changes were made to promote the use of consistent terminology throughout code or to ensure compliance with State statutes.

4.0100 Residential Land Use Districts. The proposed amendments to this section include the addition of “shared housing facilities” in -residential zones. This type of housing is allowed where multi-family housing is allowed. Other proposed changes were added for clarification of existing standards, consistency of language, or compliance with State statutes, including the use of clear and objective language.

4.0200 Commercial Land Use Districts. Only minor clarifications and corrections are proposed in this section.

4.0300 Industrial Land Use Districts. Primarily, minor clarifications and corrections are proposed in this section, including a clarification of how outdoor uses must be screened and landscaped.

4.0400 Corridor Districts. Primarily, minor clarifications and corrections are proposed in this section. The most notable change is a reduction in the amount of ground-floor commercial space that is required in mixed-use developments, as requested by Planning Commission. The applicability of design standards was also clarified by creating a new table. See the summary of Section 7.0100 for proposed amendments to design standards and guidelines in the Corridor Districts.

4.1000 Plan Districts. The only proposed change is an update to a section reference that was renumbered.

4.1100 Downtown Plan District. The existing Downtown Plan District section is proposed to be repealed and replaced because the proposed changes are extensive. This section includes the design standards and guidelines for the downtown land use districts. Notably, this section has been reorganized to show design standards and guidelines in two columns (like the other design districts), which will greatly improve the useability of this code section. It also improves alignment of terminology and organization with the other design districts. Specific updates include: an update of Townhouse standards to match other Design Districts and the standards per Section 7.0430 – Residential Townhouse Design Standards; update to language in residential standards to use clear and objective language; addition of options for sustainable site and building design; update to standards for open space to match recently approved language in Pleasant Valley; and updated language for consistency with definitions and other code sections, as well as internal consistency.

4.1200 Civic Neighborhood Plan District. The existing Civic Neighborhood Plan District section is proposed to be repealed and replaced because the proposed changes are extensive. This section includes the design standards and guidelines for the land use districts in the Civic Neighborhood. Specific

updates include: Update and addition of Townhouse standards to match other Design Districts and the standards per 7.0430; update to language in residential standards to clear and objective language; addition of options for sustainable site and building design; update to standards for open space to match recently approved language in Pleasant Valley; updated language for consistency with definitions and other code sections, as well as internal consistency.

4.1300 Gresham Butte Plan District. Only minor clarifications and corrections are proposed in this section.

4.1400 Pleasant Valley Plan District. Only minor clarifications and corrections are proposed in this section. A portion of the standards related to open space in new developments were removed from this section because they were redundant with another section. No change to the actual open space standards is proposed.

4.1500 Springwater Plan District. Only minor clarifications and corrections are proposed in this section.

5.0100 Floodplain Overlay. Only minor clarifications and terminology updates in this section.

5.0200 Hillside and Geologic Risk Overlay. Updates for consistency with Public Works standards and naming conventions.

5.0500 Open Space Overlay District. Only minor clarifications and terminology updates in this section.

5.0700 Natural Resources Overlay. Updates for consistency with Public Works standards and naming conventions; grammar; and formatting in this section.

6.0000 Introductory Provisions for Land Divisions. This section is proposed to have a new title that provides more clarity regarding its content (currently it is just Introductory Provisions). The primary change to this section is rewrite of the code pertaining to land divisions with leftover parcels. This happens when a large property only has development on a small portion, and the owner would like to divide off the undeveloped portion for new development. The proposed changes clarify and simplify what is required for such a land division. Code language related to condominiums was also simplified because this process is done through the State, not locally.

6.0100 Lot Line Adjustments and Lot Consolidations. Only minor corrections to code references are proposed in this section.

6.0200 Partitions and Subdivisions. Only a minor clarification is proposed in this section.

6.0300 Planned Developments. Only minor clarifications and corrections are proposed in this section.

6.0400 Land Division Final Plat Requirements. Only minor clarifications and corrections are proposed in this section.

6.0500 Middle Housing Land Division. Only minor clarifications and corrections are proposed in this section.

7.0000 Purpose and Authority. In this section, changes are proposed to the thresholds for different levels of design review in accordance with direction from Planning Commission and City Council. The threshold for a Design Review A - Type I review is proposed to move from additions of 1,000 square feet or less to 2,000 square feet or less to allow more applications to be reviewed in conjunction with the building permit, saving time. The threshold for elevating a Design Review application within a Design District to a Type III hearing with Design Commission is being modified. Currently, if more than three discretionary guidelines are requested, the application is elevated to a Type III review with a public hearing. This is proposed to change to allow up to five guideline requests, which will allow more

applications to remain at the staff level of review. Additionally, submittal requirements are proposed to be updated to specify when digital models are required for development proposals, rather than requiring a physical three-dimensional model, which is an outdated requirement.

7.0100 Corridor Design District. The existing Corridor Design District section is proposed to be repealed and replaced because the proposed changes are extensive. This section includes the design standards and guidelines for the land use districts in the Corridor Design Districts. Specific updates include updates to language in residential standards to clear and objective language, additions of options for sustainable site and building design, updates to standards for open space to match recently approved language in Pleasant Valley, and updated language for consistency with definitions and other code sections, as well as internal consistency.

7.0200 General Design Standards. Proposed changes to this section include reorganization of existing standards for improved clarity (including moving some standards to other sections) and removing out of date language. Changes are also proposed to standards for solid waste and recycling collection areas to improve their functionality, as requested by the City's Development Engineering and Environmental Services groups. Other clarifications and corrections are incorporated as well.

7.0300 Commercial, Institutional, and Industrial Design Standards. Changes are proposed to improve the consistency of terminology and conventions. Some standards were reworded for clarity, and other minor corrections are proposed.

7.0400 Residential Design Standards. Many of the proposed changes in this section help to ensure that code language related to housing is clear and objective, which is a State requirement. Additionally, changes are proposed to require common open space in larger subdivisions in low density residential zones. This requirement was previously implemented in Pleasant Valley and is now being expanded city-wide per guidance from the Planning Commission and City Council. Standards specific to townhouse development in some Corridor Districts are proposed to be deleted. Clear and objective standards for Townhomes will be provided in each Design District, except Corridor which will now reference the Residential District Townhouse Standards.

The design standards for cottage clusters are proposed to be revised to promote better site design and ensure this development type aligns with community expectations. For example, the proposed standards clarify that each cottage cluster must have 4-9 cottages, the minimum width for courtyards is proposed to increase from 15 feet to 25 feet, and a maximum cottage height of 25 feet is proposed. Additional changes are proposed to improve consistency and clarity, comply with State requirements, and make corrections.

7.0500 Rockwood Design Guidelines and Standards. The existing Rockwood Design Guidelines and Standards section is proposed to be repealed and replaced because the proposed changes are extensive. Specific updates include incorporating multi-family residential development standards, eliminating references to Corridor Design District so that the code section stands alone, the addition of Townhouse standards to match other Design Districts and the standards per 7.0430, updating language in standards to clear and objective language, the addition of options for sustainable site and building design, updating standards for open space to match recently approved language in Pleasant Valley, and updating language for consistency with definitions and other code sections as well as internal consistency.

8.0100 Special Use Review. Only minor clarifications and corrections are proposed in this section.

8.0200 Existing and Non-conforming Uses and Development. Proposed changes to this section include reorganizing and rewriting standards to improve clarity and ease of use, as well as minor corrections and clarifications.

8.0300 Institutional Master Plans. Only minor clarifications and corrections are proposed in this section.

9.0100 Buffering and Screening. Proposed changes to this section include reorganizing and rewriting standards to improve clarity and ease of use, as well as minor corrections and clarifications. Additionally, the requirement that a buffer be provided adjacent to residential flag lots is proposed to be removed, based on guidance from the Neighborhood Coalition and Design Commission, since such a buffer is not required for middle housing development.

9.0300 Easements. Changes in this section are proposed to align Development Code standards with existing Public Works standards and practices.

9.0400 Fencing. Minor clarifications and corrections are proposed in this section. Inclusion of language to allow entry features for residential lots, such as arbors and columns taller than the surrounding fence.

9.0500 Grading and Drainage and Stormwater Management Requirements. Changes in this section are proposed to align Development Code standards with existing Public Works standards and practices.

9.0600 Height Transition. Only minor clarifications and corrections are proposed in this section.

9.0700 Neighborhood Circulation and Future Street Plans. In this section, the proposed changes include removing requirements for neighborhood circulation plans because neighborhood circulation is already reviewed as part of the future street plan. They are therefore unnecessary and do not offer benefits to proposed developments. Other changes are proposed to help ensure standards are clear and objective, align with existing Public Works standards, and make minor corrections and clarifications.

9.0800 Parking. Primarily minor corrections and clarifications are proposed in this section. Additionally, an allowance is proposed to allow required bicycle parking in multi-story residential buildings to be located above the ground floor, which allows in-unit bike storage to count as required bike parking. Lastly, a standard related to Minor Access Street parking spaces and a standard related to driveway width for single detached dwellings are proposed to be removed because they are redundant with standards elsewhere in code. Code section will be coordinated with recently approved CFEC code amendments.

10.0100 Accessory Dwellings. Changes are proposed in this section to differentiate accessory dwellings as a unique housing type and simplify the permitting process. Currently, accessory dwellings (ADUs) in most land use districts require a Type II application. The proposed code amendment would make ADUs a Type I application, which is reviewed with the building permit. This aligns with the process for single detached and middle housing development. Regulations governing location, size, height, and setbacks are proposed to be simplified. Design standards are proposed to be simplified and align more closely with those of other low-density housing types. A provision to make it easier to convert existing accessory structures into accessory dwellings is proposed, as well as other minor corrections.

10.0200 Residential Accessory Structures. Only minor clarifications and corrections are proposed in this section.

10.0400 Conversions of Units. An addition is proposed to this section to regulate the conversion of commercial development to residential use, which helps Gresham comply with State statutes.

10.0500 Home Occupations. Only minor corrections are proposed in this section.

10.0700 Mineral and Aggregate Resource Extraction. Only minor corrections to match Public Works standards for current street types.

10.1300 Temporary Health and Hardship Dwellings. Only minor corrections are proposed in this section.

10.1500 Variance and Adjustment Procedures. Only minor corrections are proposed in this section.

10.1600 Food Carts. In this section changes are proposed to allow food carts in the Neighborhood Commercial district, which was unintentionally omitted previously, and to make minor corrections.

10.1700 Affordable Housing Development. Updates to this section were made to comply with State regulations. For example, a new subsection regulating the development of affordable housing on properties designated for commercial use was added. Another change is proposed that will allow religious corporations to develop affordable housing more broadly. Other changes are proposed to improve clarity and usability.

11.0100 Development Permit Requirements. Additional code language is proposed in this section to help clarify the processes for modifications to design review applications because some modifications utilize discretionary guidelines that could push an application to a new level of design review. This clarification will help developers know what to expect and help staff process them more efficiently. Other minor clarifications and corrections are also proposed.

11.0200 Initiation and Classification of Applications. Only minor corrections are proposed in this section.

11.0800 Neighborhood Meeting. A change is proposed in this section to codify the use of virtual neighborhood meetings and allow in-person meetings to be held in any agreed-upon location. This change facilitates and simplifies the neighborhood meeting process. Other minor corrections and clarifications are proposed.

12.0100 Plan Map Amendments and Amendments to Map Boundaries. Minor clarifications and corrections are proposed in this section, as well as renumbering.

12.0200 Community Development Plan Amendments. This is a new section that is proposed to codify the process and criteria for the City to initiate amendments to the community development plan. It identifies that these amendments are a Type IV legislative procedure and provides criteria that a proposed amendment must comply with.

Appendix 3 Guarantee of Completion and Warranty Guaranty. Updates to codify current practices of guarantees of completion and warranty guarantees. Additional updates for clarifications and formatting consistency in this section.

Appendix 5 Public Facilities. The existing Public Facilities section is proposed to be repealed and replaced because the proposed changes are extensive. Notably, changes to Minor Access Streets are proposed to address infrastructure challenges associated with the development of middle housing. Additional changes include the removal or rewrite of non-clear and objective language; establishment of consistent naming conventions for public rights of way, including public paths and trails; clarification of processes related to public facilities for land divisions and building permit approvals and issuance. Clarify language for ease of use and consistency internally and throughout the development code.

Appendix 6.000 Sign Regulations. Clarification of process for encroachment of signs into the public right-of-way. Updates to formatting of land use district names.

SECTION II. APPLICABLE COMMUNITY DEVELOPMENT CODE PROCEDURES

Section 11.0200 Initiation and Classification of Applications

Section 11.0600 Type IV Legislative Procedures

Section 11.1000 Public Hearings

Section 11.0200 Initiation and Classification of Applications

- **11.0201 – Initiation of an Application.** This section provides that City Council may initiate a Type IV legislative application to amend the Community Development Plan.

Findings: This project was initiated by City Council on June 18, 2023. City Council will review these amendments at a hearing on January 6, 2026.

- **11.0203 and 11.0204 – Classification of Applications and Review Authorities.** These sections provide that Type IV procedures are legislative and typically involve the adoption, implementation, or amendment of policy by ordinance. They also provide that the Planning Commission provide a recommendation on Community Development Plan Amendments and the City Council be the decision-making authority.

Findings: This project meets those conditions and is being processed under the Type IV procedures and will be heard by both the Planning Commission and the City Council.

Section 11.0600 – Type IV Legislative Procedures

- **11.0602(A)&(B) – Pre-application and Neighborhood Meetings.** These meetings are not required of Type IV legislative applications.

Findings: Although a pre-application meeting and neighborhood meetings are not required, public meetings were held and provisions for public involvement were included in the project.

- **11.0602(C) – Application Initiation.** This section provides that the City Council may initiate a Type IV legislative application to amend the text of the Community Development Plan.

Findings: As noted above, this project was initiated by City Council on June 18, 2023.

- **11.0602(D)(1) – Type IV Public Notice for Comprehensive Plan Amendments.**

(a) For a Type IV Comprehensive Plan Amendment this section requires a submittal to the DLCD and Metro at least 35 days prior to the Planning Commission hearing.

(c) This section requires that at least 10 days before the initial hearing, a notice be published in a newspaper of general circulation in the city and copies of the hearing notice made available in City Hall.

Findings: Submittal to DLCD and Metro was made on November 3, 2025, which is 35 days prior to the Planning Commission hearing date of December 8, 2025. Required notice of the public hearing for these proposed amendments were published in the *Gresham Outlook* before

November 28, 2025 (10 days in advance of the December 8, 2025 Planning Commission Hearing) and was made available through City Hall as required by this section.

- **11.602(E) – Type IV Decision Authority and 11.602(F) Type IV Notice of Decision.** This section requires that the Planning Commission hold a public hearing and make a recommendation to the Council for an amendment to the Community Development Plan. The Council considers that recommendation at their hearing and makes a final decision. Interested persons may present evidence and testimony relevant to the proposal at either or both hearings.

Findings: The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings. This standard will be met with issuance of a decision.

11.1000 – Public Hearings. This section provides for a hearing process consistent with Section 11.1000.

Findings: The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings.

This standard will be met with issuance of a decision.

Conclusion: The proposed amendments meet all applicable Development Code standards and procedures.

SECTION III. APPLICABLE COMMUNITY DEVELOPMENT PLAN (GCDP) GOALS & POLICIES

This section identifies the applicable Community Development Plan goals, policies, and action measures. The text (*italicized*) of the goals, policies, and action measures is followed by corresponding findings and conclusions.

Section 10.014 Land Use Policies and Regulations

Section 10.100 Citizen Involvement

Section 10.300 The Physical Environment

Section 10.313 Industrial Land Uses

Section 10.315 Open Space

Section 10.400 The Social Environment

Section 10.412 Parks, Recreation, Open Space and Trails

Section 10.414 Economic Development

Section 10.600 Housing

Section 10.014 – Land Use Policies and Regulations

- Goal: Maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham’s land use program.
- Policy 1: The City’s land use program will be consistent with state and regional requirements but also shall serve the best interests of Gresham.
- Policy 2: The City’s land use regulations, actions, and related plans shall be consistent with and implement the Comprehensive Plan.
- Policy 4: The City shall promote a development pattern of land uses in the amounts, types, and of sufficient economic values to advance the community’s quality of life and its social and fiscal stability.
- Policy 12: The City shall establish design standards to assure quality development and enhance the community’s attractiveness and livability.
- Policy 15: Applicants shall bear the burden of proof when proposing to amend the Community Development Plan Map or the Comprehensive Plan text to show compliance with approval criteria. This includes applicable Comprehensive Plan goals and policies.
- Policy 20: The City shall periodically review and update the Comprehensive Plan text and the Community Development Plan Map(s) to ensure they remain current and responsive to community needs; provide reliable information and dependable factually-based policy direction; and conform to the applicable state law, administrative rules, and regional requirements.
- Policy 21: Council may, upon finding it is in the overall public interest, initiate legislative processes to change the Comprehensive Plan text and Community Development Plan Map(s) and Development Code.
- Action Measure 11: Revise the Comprehensive Plan Text, Map, and related findings as needed to maintain its reliability and timeline to ensure consistency among goals, policies, implementing measures; accuracy of findings and compliance with regional, state, and federal laws and rules. This includes review by the Planning Commission every two years.
- Action Measure 12: Monitor and evaluate whether City actions and resulting community conditions and circumstances are consistent with the goal and policy directions of the Comprehensive Plan.
- Action Measure 13: Monitor actions, programs and policies of federal, state and regional governments and when appropriate amend the Comprehensive Plan to be consistent with new laws and administrative rules.

Action	Allow mixed-use commercial, employment, and residential development to support transit use, enhance neighborhood economic and social vitality, and provide for a range of housing opportunities/options.
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Findings: City Council initiated this update to the Development Code Process Update (DCPU) in Spring 2023 to implement certain Oregon state laws and legislation and facilitate housing production, affordability, and choice. As part of this update, the DCPU project also included code updates to reformat and reorganize code sections. Definitions were added (or removed when unused or out of date), and code language throughout all code sections was standardized for clarity and consistency. Process changes included changes to design review thresholds to allow more development to stay at a staff level review. The DCPU project responds to Policies 1, 2, 4, 5, 12, 15, 20 and 21 and Action Measures 11, 12, 13, and 15.

The proposal updates the City’s development code to implement State legislation regarding occupancy limits for dwelling units based on familial or nonfamilial relationships among any occupants (HB 2583); regulations relating to siting and design of accessory dwelling units (SB 1051; HB 2001); manufactured and prefabricated dwellings definitions and regulations (HB 4064); residential homes and residential facilities definitions, siting, and regulations (ORS 197.660-197.670); single room occupancy definition and siting standards (HB 3395); affordable housing with density/height bonus (SB 8); affordable housing on commercial lands (HB 3395); affordable housing owned by a religious nonprofit (HB 2008); expedited affordable housing review (SB 1051); and commercial building conversion to residential use (HB 2984).

The proposal includes amendments to support a pattern of land development and uses in the amounts, types, and of sufficient economic value to advance the community's quality of life. Additional code updates include a reduction of required ground floor commercial floor area in new development adjacent to certain intersections in the Rockwood and Corridor Design Districts and along commercial corridors to align better with the current demand for commercial floor area in the community, aligning better with lot size, street frontage, and current development patterns. Standards in the design and plan districts (Downtown, Civic, Corridor, and Rockwood) have been updated to promote best practices in sustainable development, to provide consistent standards for townhouse and townhouse style development, and to regulate site and building design elements based on location and the context of the surrounding built environment.

Gresham's Community Development Plan has been found to be in compliance with State and regional requirements. The proposed amendments have been found to be in compliance with Gresham's Community Development Plan and State and regional requirements as described in this staff report. The code amendments will not reduce the amount of minimum zoned housing capacity in the city.

As required by State and Metro regulations, a draft of the proposed amendments were sent to the Oregon Department of Land Conservation and Development (DLCD) and to Metro at least 35 days prior to the scheduled December 8, 2025 Planning Commission Hearing. Findings within this staff report affirm compliance with Metro’s Urban Growth Management Functional Plan including maintaining the city’s minimum zoned housing capacity and that any amendments affecting Title 4 areas are consistent with Title 4 requirements.

Conclusion: The proposed amendments to the Gresham Community Development Plan meet the Land Use Policies and Regulations goal to maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham’s land use program.

Section 10.100 – Citizen Involvement

- Goal: The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.
- Policy 1: The City shall ensure the opportunity for citizen participation and input when preparing and revising policies, plans, and implementing regulations.
- Policy 2: The City shall consider the interests of the entire community and the goals and policies of the Comprehensive Plan when making decisions.
- Policy 6: The City shall ensure that technical information necessary to make policy decisions is readily available.
- Policy 7: The City shall facilitate involvement of citizens in the planning process, including data collection, plan preparation, adoption, implementation, evaluation, and revision.
- Policy 9: The City shall ensure that citizen involvement plans and activities incorporate Gresham’s diverse constituencies regardless of age, sex, religion, social, or business affiliation.
- Policy 10: The City shall ensure the opportunity for the public to be involved in all phases of planning projects and issues.
- Policy 11: The City shall ensure that the public has complete and timely access to all public information concerning land use projects and issues. This includes private proposals once they are in the formal application process.
- Action Measure 2: Ensure that the input, information, factual contributions, and expertise provided by citizens is considered.
- Action Measure 4: Keep the public informed of opportunities for involvement in all phases of land use planning issues.
- Action Measure 5: Provide citizens timely access to all public information related to land use matters.
- Action Measure 6: Communicate information clearly and effectively.
- Action Measure 7: Engage in outreach activities to inform and encourage public involvement.
- Action Measure 8: Facilitate citizen input in the process for revising local land use plans and ordinances.
- Action Measure 9: Make public participation processes user-friendly.

Action	When appropriate, provide culturally sensitive participation opportunities, which may
Measure 11:	include language translation and interpretation.

The comments and suggested code updates were thoughtfully considered and, in most instances, incorporated into the project. For example, following guidance from City Council, Planning Commission, and the Neighborhood Coalition regarding the need to reduce vacant storefronts, staff incorporated code amendments to reduce the requirements for ground-floor commercial square footage in Corridor land-use districts. Feedback from Design Commission also informed code amendments to open space standards in some Design Districts, including requiring the size of publicly accessible open spaces to be a percentage of the commercial floor area provided on a site and requiring accessible ground cover material for children’s play areas. Individual developers also provided ideas for low cost/high impact sustainable building design features that could be incorporated into the Design Districts’ menu of sustainability options.

Draft Planning Commission minutes will be forwarded to City Council prior to the final Hearing for their consideration while making a decision in response to Action Measure 2. The recording of the PC Hearing will also be available to Council and the public prior to the final hearing.

Section 10.300 – The Physical Environment

Section 10.314 – Downtown Plan District

Urban Design Goal:	Make Downtown a special place that is visually interesting and that has buildings and streetscapes of high design quality.
Urban Design Action Measure 1:	Develop a design manual with mandatory design principles, standards and guidelines that will apply to future Downtown buildings and streetscapes.
Urban Design Goal:	Make Downtown a special place that is visually interesting and that has buildings and streetscapes of high design quality.
Urban Design Action Measure 1:	Develop a design manual with mandatory design principles, standards and guidelines that will apply to future Downtown buildings and streetscapes.

Findings: The format of the Downtown Plan District Design Manual (Section 4.1100 of the Gresham Community Development Code) will be updated for ease of use and clarity, with standards and guidelines on one page, matching the format of the Civic Neighborhood Design Manual. The proposed code amendments aim to better support housing development through inclusion of clear and objective standards for all residential housing types. The update will also update townhouse development standards to be consistent with residential district townhouse design standards (Section 7.0431).

Conclusion: The Community Design Goal (10.314) and its related policies are addressed through the code amendments to Section 4.1100 Downtown Plan District Design Manual. The proposal is consistent with the applicable Community Design goals and policies.

Section 10.318 – Gresham Civic Neighborhood

Land Use Goal:	Commercial, residential, institutional, and office uses all fit together at different scales and development intensities to support a diverse population and provide multiple options for jobs, housing, shopping, and services.
Land Use Action Measure 2:	Develop Civic Neighborhood Design Guidelines and Standards which allow, and encourage, the best in urban living – providing a mix of uses that provides opportunities for employment, recreation, and housing in the neighborhood.
Housing Goal:	Civic Neighborhood will continue to be developed with medium- to high-density, quality housing that complements its mixed-use transit-oriented character.
Housing Action Measure 1:	Create design guidelines and standards for residential development that are specific to the Civic Neighborhood.

The proposed code amendments aim to better support housing development through inclusion of clear and objective standards for all residential housing types. The code amendments will also update townhouse development standards to be consistent with residential district townhouse design standards (Section 7.0431).

Section 10.319 – Central Rockwood Area

Findings: Standards and guidelines in the Rockwood Design District (Section 7.0500 of the Gresham Community Development Code (GCDC)) will be updated for ease of use and clarity, with changes to formatting and internal organization (i.e., the order of standards within the Design Guidelines and Standards, Section 7.0500), removal of repeated standards, and updates to terminology for consistency across design districts, internally, and with other code sections.

Conclusion: The Central Rockwood Area (10.319) goals and its related policies are addressed through the code amendments to Section 7.0500 Rockwood Design District. The proposal is consistent with the applicable goals and policies.

Section 10.320.1 – Street System

Street System Policy 1: Provide a street system that accommodates a variety of travel options.

Action Measure 1: Maintain a functional classification system and street design standards that serve all modes of transportation and support regional and local land use plans.

Street System Policy 2: Develop a street system that meets current needs and anticipated future population growth and development.

Action Measure 3: Coordinate with the City’s Public Works Standards to specify street design standards.

Street System Policy 3: Provide a street system that maximizes accessibility and mobility within the community.

Action Measure 4: Implement the Future Street Plan and street connectivity standards to ensure the development and completion of logical and continuous local street patterns within residential and mixed-use areas as development occurs. Per the Future Street Plan and street connectivity standards, new development must provide for the continuation and inter-connection of existing streets and must avoid long dead-end street patterns.

Findings: The proposed code amendments support the policies identified in the section. Code amendments include updates to street standards and naming conventions for certain street types in the Public Works Standards. The proposed updates address challenges proposed by new types of development patterns with the introduction of middle housing that may require alternative street configurations to allow for the efficient circulation of vehicles into and around new development. The amendments address Street System Policy 2 (“meeting future needs...”) by introducing a Minor Access Street standard. This public right-of-way is specifically designed to accommodate the circulation needs of middle housing and cottage clusters – development types that were not prevalent when the previous code was adopted. In the Rockwood Design District (Section 7.0500 of the GCD), new block sizes were standardized for inside and outside the triangle, in place of design standards that dictated block size by land use, potentially resulting in incongruous block patterns.

Conclusion: The Street System (10.320.1) policies are addressed through the scale and design of the amended street types found in Appendix 5 Public Works Standards, and block size limits found in the Rockwood Design District. The proposal is consistent with the applicable street system goals and policies listed in this section.

Section 10.320.4 – Pedestrian System

Pedestrian System Policy 1: Provide pedestrian facilities that are continuous, accessible, and adaptable to all users.

<p>The Community Development Code will establish an expeditious design process:</p>	<ul style="list-style-type: none"> a. Based on design criteria; b. As an administrative procedure with an appeals process; c. Applicable to attached residential structures, moderate density development, commercial and industrial uses and community services.
<p>Implementation Strategy 2:</p>	<p>The Community Development Standards document will include design criteria which:</p> <ul style="list-style-type: none"> a. Preserve and enhance the amenities of the natural and physical environment; b. Maintain and improve the qualities of the relationships among buildings and surrounding neighborhoods; c. Ensure that individual developments contribute to a quality environment for people utilizing the development and the surrounding neighborhood; d. Encourage consideration for the climate, soil capabilities and limitations, topography, sun orientation and natural vegetation in the site plan.
<p>Implementation Strategy 3:</p>	<p>The Community Development Standards will prescribe design requirements related to:</p> <ul style="list-style-type: none"> a. Community identity; b. Site layout considering factors such as: climate, privacy, usable outdoor areas, topography, vegetation, natural drainage, use by the handicapped and crime prevention; c. Private outdoors spaces; d. Parking; e. Circulation; f. Service and delivery areas; g. Entry areas; h. Outdoor storage; i. Landscaping and buffering; j. Building orientation; k. Transit and pedestrian access; l. Retention of natural features and significant vegetation.
<p>Implementation Strategy 4:</p>	<p>The Community Development Standards will also apply to design requirements to land divisions</p>

Section 10.413.2 – Design Standards for Multi-Family Developments

Goal: Multi-family developments will be attractive, high-quality, safe and sustainable where diversity, innovation and creativity are welcome and multiple modes of transportation are accessible for Gresham residents.

Action Measure 1: Identify and assess methods that could be utilized to implement the design principles such as the two alternative review processes:

- The clear and objective process applying the Design Standards;
- The discretionary process applying the Design Guidelines.

Findings: The proposed code amendments to standards in the design districts (Downtown, Civic, Rockwood and Corridor) provide clear and objective language for the design of multi-family development. The transition to clear and objective design standards addresses compliance with ORS 197A.400 by removing subjectivity from the review process. By replacing subjective language with measurable standards for multi-family (and townhouse) developments, the City provides certainty to housing developers, reduces the risk of appeals, and shortens the timeline from application to construction, thereby facilitating the efficient production of needed housing units.

In addition, standards have been updated, consolidated or deleted for internal and external consistency within other design districts and code sections. Multi-family design standards have been added to the Rockwood Design District (Section 7.0500 of the GCDC), eliminating cross-referencing with the Corridor Design District residential standards (Section 7.0100 of the GCDC). The updates are intended to ensure consistency and predictability in the development review process, thereby reducing barriers to development of new housing. See Exhibits A-D, for the full proposed text of the guidelines and standards for the Downtown, Civic, Corridor and Rockwood Design Districts.

Conclusion: The Design Standards for Multi-family Developments (10.413.2) goal and its related policies and action measure are addressed through the proposed updates to the design district standards. Updates to the development code will include clear and objective standards that support high-quality, safe, and sustainable multi-family development.

Section 10.413.3 – Design Standards for Commercial Development in the Corridor Design District

Goal: Commercial developments in the Corridor Design District will be human scaled, attractive, safe and active places of excellent design which utilize high-quality and sustainable materials. Innovation and creativity in design is encouraged.

Action Measure 1: Identify and assess methods that could be utilized to implement the design principles such as the two alternative review processes:

- The clear and objective process applying the Design Standards;
- The discretionary process applying the Design Guidelines.

Findings: The proposed code amendments to the Corridor Design Districts (Section 7.0100) will update, consolidate or delete commercial standards for internal and external consistency within other design districts and code sections. The updates are intended to ensure consistency and predictability in the development review process, while maintaining high quality site and building design. Standards were updated for clarity, and where applicable, to include clear and objective language.

In addition, development standards that required buildings along certain commercial corridors to provide a percentage of the ground floor as commercial uses and maintain a percentage of the street frontage as a commercial use were modified to reflect current development patterns. Updates included limiting the amount of commercial floor area required to the building area closest to the street and reducing the commercial street frontage requirement to the building's linear frontage, in lieu of the entire site's linear street frontage. This code amendment also supports Policy 4 (under Section 10.014 – Land Use Policies and Regulations) by right sizing commercial requirements to align with market demand. By limiting the mandatory commercial floor area to the building frontage nearest the street, the code reduces the construction of surplus commercial space that is likely to remain vacant. This ensures new mixed-use developments also remain financially viable while still activating the pedestrian realm along commercial corridors.

See the Council Bill for modification to development standards for the Corridor land use districts and Exhibit C for the full proposed text of the guidelines and standards for the Corridor Design District.

Conclusion: The Design Standards for Commercial Development in the Corridor Design District (10.413.3) goal and its related policies and action measure are addressed through the proposed updates to the design district standards. Updates to the development code will include clear and objective standards that support high-quality commercial development along the city's commercial corridors.

Section 10.413.4 – Design Standards for Development in the Rockwood Design District

Goal: Development and redevelopment in the Rockwood Design District will be attractive, safe, pedestrian friendly, high-quality and sustainable in order to foster a positive image for Rockwood. Innovation and creativity in design are encouraged.

Action Measure 1: Identify and assess methods that could be utilized to implement the Design Principles such as the two alternative review processes:

- The clear and objective process applying the Design Standards; and
- The discretionary process applying the Design Guidelines

Findings: The proposed code amendments to the Rockwood Design Districts (Section 7.0500 of the GCDC) will update, consolidate or delete standards for internal and external consistency within other design districts and code sections. Residential design standards and guidelines will be added to the Rockwood Design District for multi-family/ shared housing facility residential, and townhouse development. The addition of standards and guidelines will allow the Rockwood Design District to stand as a complete document without requiring cross-referencing to residential standards in the Corridor Design District or townhouse standards elsewhere in the GCDC. The updates are intended to ensure consistency and predictability in the development review process, while maintaining high quality site and building design. Standards were updated for clarity, and where applicable, to include clear and objective language. See Exhibits D, for the full proposed text of the guidelines and standards for the Rockwood Design Districts.

Conclusion: The Design Standards for Development in the Rockwood Design District (10.413.3) goal and its related policies and action measure are addressed through the proposed updates to the design district standards. Updates to the development code will include clear and objective standards that support high-quality commercial development along the city’s commercial corridors.

SECTION IV. APPLICABLE METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN TITLES

Title 1	Housing Capacity
Title 4	Industrial and Other Employment Areas
Title 8	Compliance Procedures

Title 1 – Housing Capacity

Title 1 of Metro’s Urban Growth Management Functional Plan (UGMFP) is intended to promote efficient land use within the Metro UGB by increasing housing capacity. Section 3.07.110 states that, *“the Regional Framework Plan calls for a compact urban form and a ‘fair-share’ approach to meeting regional housing needs. It is the purpose of Title 1 to accomplish these policies by requiring each city and county to maintain or increase its housing capacity...”*.

Findings: The proposed code amendments do not reduce the minimum zoned housing capacity of the City of Gresham. No land use district boundaries are proposed to be changed, nor density requirements amended as part of the code updates. In compliance with Oregon State Statute (ORS) 197A.400, development standards, conditions, and procedures for the development of housing in the Gresham Community Development Code will be updated to be clear and objective. The proposed amendment

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also creates consistency in standards and review procedures for manufactured dwelling parks and accessory dwelling units to ensure they are not subject to a higher level of review than a single detached dwelling development.

Title 4 – Industrial and Other Employment Areas

It is the purpose of Title 4 to protect a supply of sites for employment by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs), Industrial and Employment Areas. Title 4 also seeks to provide the benefits of “clustering” to those industries that operate more productively and efficiently in proximity to one another than in dispersed locations. Title 4 Section 3.07.440 Protection of Employment Areas states the following:

- (a) Except as provided in subsections (c), (d), and (e), in Employment Areas mapped pursuant to Metro Code section 3.07.450, cities and counties shall limit new and expanded commercial retail uses to those appropriate in type and size to serve the needs of businesses, employees, and residents of the Employment Areas.
- (b) Except as provided in subsections (c), (d), and (e), a city or county shall not approve a commercial retail use in an Employment Area with more than 60,000 square feet of gross leasable area in a single building, or commercial retail uses with a total of more than 60,000 square feet of retail sales area on a single lot or parcel, or on contiguous parcels, including those separated only by transportation right-of-way.

Findings: The proposed code amendments are primarily focused on addressing updates to residential development by bringing the GCDC into compliance with State legislation. Additional updates focus on reorganization and clarification of standards, which includes updates to standards for commercial and industrial uses. However, no amendments are proposed to modify Title 4 requirements for protection of industrial areas (3.07.430), employment areas (3.07.440), or to change the designation of land on the Employment and Industrial Area Map (3.07.450). The proposed code amendments are consistent with the applicable policies listed in this section.

Title 8 – Compliance Procedure

Findings: Section 3.07.820 of this title requires that at least 35 days prior to the first evidentiary hearing on an amendment to a comprehensive plan or land use regulation that the City submit the proposed amendments to Metro. Metro may review the amendments and can request that the City provide an analysis of compliance with the Functional Plan.

The City submitted the proposed amendments to Metro on November 3, 2025, which was at least 35 days prior to the first evidentiary hearing of December 8, 2025. Metro contacted the City on November 17, 2025 regarding this notice confirming that they received the notice and requesting confirmation in Findings for compliance with Title 1 and Title 4.

Conclusion: The City has submitted the proposed amendments to Metro at least 35 days prior to the first evidentiary hearing. The proposal is consistent with Title 8 (Compliance Procedures), Title 1 (Housing Capacity) and Title 4 (Industrial and Other Employment Areas). The proposed amendments comply with all the applicable Metro Urban Growth Management Functional Plan Titles.

SECTION V. APPLICABLE OREGON STATEWIDE PLANNING GOALS

Goal 1	Citizen Involvement
Goal 2	Land Use Planning
Goal 10	Housing

Goal 1 – Citizen Involvement

Statewide Planning Goal 1 for Citizen Involvement requires that cities “*insure the opportunity for citizens to be involved in all phases of the planning process.*”

Findings: Gresham’s Planning Commission acts as the Committee for Citizen Involvement (CCI) and has been involved in the project from the beginning of the project in 2024.

The public process included various outreach efforts including but not limited to web updates, cross-cultural engagement sessions, neighborhood association workshops, and work sessions with the Design Commission, Planning Commission, and City Council. The public was noticed of the Design Commission, Planning Commission, and City Council Hearings through the City’s webpage, interested parties email update, and published in the *Gresham Outlook*.

Public comment may be submitted before or during the forthcoming Planning Commission hearing and City Council hearing. All those who submit comment on the proposed amendment receive a notice of decision.

Additional findings regarding Citizen Involvement can be found in Section III, Section 10.100 of this report.

Goal 2 – Land Use Planning

Statewide Planning Goal 2 for Land Use Planning requires cities, “*to establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions. This shall result in land use plans and implementation measures that are consistent with the land use plans.*”

Findings: The City has a state-acknowledged Comprehensive Plan. Section III of this report describes findings and conclusions that all actions related to land use (i.e., the proposed code amendments) are consistent with applicable procedures and applicable goals and policies of the City’s Comprehensive Plan. In compliance with Goal 2, the proposed code amendments will be considered at a public hearing with opportunities for review and comment by residents and affected governmental units, including DLCD and Metro.

Conclusion: The proposed amendments comply with the applicable Statewide Planning Goals 1 (Citizen Engagement) and 2 (Land Use). As of the date of this report, DLCD has not contacted the City regarding the notice for these amendments.

Goal 10 – Housing

Statewide Planning Goal 10 for Housing requires cities to “*provide for the housing needs of citizens of the state.*” Goal 10 specifies that each city must plan for and accommodate needed housing.

Findings: As described in the executive summary of this staff report, the proposed amendments were drafted to achieve regulatory compliance including ensuring all standards for residential development are “clear and objective” as required by ORS 197A.400. Furthermore, the proposal updates the City’s development code to implement State legislation regarding occupancy limits for dwelling units based on familial or nonfamilial relationships among any occupants (HB 2583); regulations relating to siting and design of accessory dwelling units (SB 1051; HB 2001); manufactured and prefabricated dwellings definitions and regulations (HB 4064); residential homes and residential facilities definitions, siting, and regulations (ORS 197.660-197.670); single room occupancy definition and siting standards (HB 3395); affordable housing with density/height bonus (SB 8); affordable housing on commercial lands (HB 3395); affordable housing owned by a religious nonprofit (HB 2008); expedited affordable housing review (SB 1051); and commercial building conversion to residential use (HB 2984).

As noted in Section IV, the proposed code amendments do not reduce the minimum zoned housing capacity of the City of Gresham. No land use district boundaries are proposed to be changed, nor density requirements amended as part of the code updates.

Conclusion: The proposed amendments comply with all applicable Statewide Planning Goals: Goals 1 (Citizen Engagement), 2 (Land Use) and Goal 10 (Housing).

SECTION VI. CONCLUSION

The proposed Community Development Plan text amendments included in the Council Bill and Exhibit A through E are consistent with all applicable procedures, goals and policies of the Community Development Plan, applicable Titles of the Metro Urban Growth Management Functional Plan, and applicable Statewide Planning Goals as indicated by findings contained or referenced in Section V of this report.

SECTION VII. RECOMMENDATION

Staff recommends **adoption** of the proposed Comprehensive Plan text amendments, CPA-25-00460, as contained in the attached exhibits, based on the findings, conclusions, and recommendations in the November 28, 2025, staff report.

End of staff report