

Subject: Request to Include Questions and Comments in the Record – July 30, 2026
Joint Planning Commission / Public Advisory Committee Workshop
Chair and Commissioners,

Please include the following questions and comments in the record for the July 30, 2026 Joint Planning Commission and Public Advisory Committee workshop.

As I reviewed the workshop materials, I also reviewed the Oregon Department of Land Conservation and Development's May 7, 2025 Housing Needs Analysis Rulemaking Advisory Committee meeting. During that meeting, DLCD staff and committee members discussed an important planning principle that appears directly relevant to the City's current Comprehensive Plan update: there is an important distinction between land that is merely planned or mapped for future development and land that is actually becoming "development ready" through engineering, infrastructure planning, capital improvements, utility extensions, and other implementation actions. The discussion also emphasized the importance of coordinating planning documents, engineering decisions, and capital improvement programming so property owners understand when long-range planning begins affecting specific properties.

The workshop packet explains that the Comprehensive Plan establishes City policy, the Development Code determines where and how development may occur, and standards and specifications govern infrastructure design and construction. Because numerous planning documents—including the Comprehensive Plan, Transportation System Plan (TSP), Main Street IAMP, Parks Master Plan, Public Facilities Plan, Housing Capacity Analysis (HCA), Buildable Lands Inventory (BLI), Employment Opportunities Analysis (EOA), and Capital Improvement Plan (CIP)—appear to be advancing on overlapping timelines, I respectfully request clarification regarding where the City believes planning ends and implementation begins.

1. Main Street IAMP implementation

The draft policies state that the City intends to complete and implement the Main Street IAMP refinement.

During DLCD's rulemaking discussion, staff explained that infrastructure planning, engineering, and capital improvement programming are among the actions that move land from long-range planning toward implementation.

Accordingly:

What specific actions does the City consider to be part of "implementation"?

Does implementation include:

- selecting a preferred improvement or alignment;
- engineering and design;
- identifying right-of-way;
- estimating acquisition costs;
- adopting a funding strategy;
- adding projects to the Capital Improvement Plan;
- restricting property access;
- acquiring easements or land; or
- authorizing construction?

At what stage will affected property owners receive individual notice?

2. Conceptual versus committed projects

What objective standard will the City use to distinguish between:

- a conceptual facility;
- a preferred facility;
- a programmed facility;
- a funded facility; and
- a committed construction project?

At what point may City staff, consultants, or decision-makers rely upon a mapped road, park, trail, utility, or transportation facility when making property-specific decisions?

3. Separate notice and appeal opportunities

Which future implementation decisions will receive separate public notice and hearing opportunities?

Please identify whether separate notice will be provided for:

- IAMP adoption;
- preferred transportation alignments;
- Development Code amendments;
- zoning-map amendments;
- Public Works Standards;
- Capital Improvement Plan projects;
- access-management decisions;
- park or trail acquisition;
- utility extensions;
- right-of-way acquisition; and
- property-specific development conditions.

4. Identification of affected properties

Before the Comprehensive Plan is adopted, will the City prepare a parcel-level map identifying private tax lots that could be affected by:

- planned rights-of-way;
- future access changes;
- park or trail corridors;
- utility extensions;
- public-facility locations;
- easements;
- land acquisition; or
- required dedications?

If not, when will that property-level analysis occur?

5. Relationship among planning documents

How will the City reconcile differences among the:

- Transportation System Plan;
- Main Street IAMP;
- Parks Master Plan;
- Housing Capacity Analysis;
- Buildable Lands Inventory;
- Employment Opportunities Analysis;
- Public Facilities Plan;
- Capital Improvement Plan;
- Future Land Use Map;
- Development Code; and
- Public Works Standards

if they contain different facility locations, transportation assumptions, utility assumptions, service areas, or growth projections?

Which document controls if conflicts exist?

6. Changes to technical documents

If a technical document relied upon by the Comprehensive Plan is later amended, withdrawn, remanded, or materially changed, what process will the City use to review and amend dependent Comprehensive Plan policies?

Will the City commit to reconsidering policies that rely upon factual assumptions that later change?

7. Protection of TSP facilities

If the Comprehensive Plan requires land-use decisions to protect facilities identified in the Transportation System Plan, what does “protect” mean for private property?

Could that policy result in:

- denial or limitation of access;
- required right-of-way dedication;
- setbacks from future facilities;
- development limitations;
- reservation of land;
- transportation improvement payments; or
- conditions requiring construction of improvements?

What standards prevent conceptual transportation facilities from functioning as de facto property restrictions before those facilities have been fully adopted, engineered, funded, and approved?

8. Park and trail acquisition

Will future parkland and trail dedication standards apply only to new subdivisions and development applications, or could they also affect existing properties?

What process will govern:

- voluntary acquisition;
- easements;
- appraisals;
- negotiations;
- Council authorization; and
- possible condemnation?

9. Capital Improvement Plan

During DLCD's discussion, committee members emphasized the importance of distinguishing between conceptual infrastructure and projects that have progressed into capital programming and implementation.

For each project placed into the Capital Improvement Plan, will the City disclose:

- project location;
- affected tax lots;
- project phase;
- right-of-way needs;
- estimated acquisition costs;
- engineering costs;
- construction costs;
- funding source;
- responsible agency;
- projected schedule; and
- whether voluntary acquisition or condemnation may be required?

10. Future Land Use Map assumptions

For each area proposed for additional growth or changed land-use designation:

- what transportation facilities;
- water facilities;
- sewer facilities;
- parks;
- trails; and
- public facilities

are assumed to support that growth?

Where are those facilities expected to be located?

Are those assumptions fully consistent with the TSP, Main Street IAMP, HCA, BLI, Public Facilities Plan, and Capital Improvement Plan?

11. Implementation matrix

Will the City prepare an implementation matrix before adoption identifying:

- each Comprehensive Plan goal and policy;
- implementing document;
- responsible department;
- responsible agency;
- adoption schedule;
- funding source;
- required land-use action;
- public notice process; and
- possible effects on private property?

12. Advance notice to affected owners

Will the City commit to providing advance written notice before:

- selecting a preferred route;
- identifying private property for acquisition;
- restricting access;
- adding a property-specific project to the Capital Improvement Plan;
- commissioning final engineering;
- applying for construction funding; or
- imposing dedication or easement conditions?

13. Coordination among planning documents

DLCD's Rulemaking Advisory Committee repeatedly discussed the importance of coordinating land-use planning, engineering, infrastructure planning, and capital improvements so that planning documents provide predictable guidance to both local governments and affected property owners.

Because the Comprehensive Plan, Transportation System Plan, Main Street IAMP, Development Code, Housing Capacity Analysis, Parks Master Plan, Public Facilities Plan, and Capital Improvement Plan are all moving on overlapping schedules, how will the City ensure that one planning process does not create property-specific commitments before related plans have been completed, reconciled, and independently adopted?

14. Development readiness

The DLCD rulemaking discussion introduced the concept of "development-ready" land, recognizing that infrastructure planning, engineering, utility extensions, and capital improvements can move land from long-range planning toward implementation.

Oregon Housing Needs Analysis, Rulemaking Advisory Committee meeting
Accordingly:

At what point does the City consider a transportation, utility, park, trail, or public facility shown in the Comprehensive Plan, Transportation System Plan, Main Street IAMP, Parks Master Plan, Public Facilities Plan, or Capital Improvement Plan to be "development ready" rather than conceptual?

What objective criteria will the City use to determine when a project has transitioned from planning into implementation?

How will affected property owners be notified when that transition occurs?

15. West Glen water service

The agenda asks whether the City should provide water outside city limits for public-health purposes.

Please identify:

- the geographic area under consideration;
- proposed water lines;
- booster facilities;
- easements;
- roads;
- sewer facilities;
- annexation assumptions;
- funding mechanisms; and
- whether providing water outside city limits creates an expectation of future urban development or annexation.

16. Request for written responses

Because many of these questions involve implementation sequencing rather than issues that can reasonably be answered during limited oral testimony, I respectfully request written responses or identification of where these issues will be addressed in future staff reports, findings, maps, policies, implementation documents, or capital improvement planning.

17. Public Facilities Plan consistency

Because the Comprehensive Plan appears to rely on future public facilities, will the City identify which Public Facilities Plan projects are:

- existing;
- funded;
- programmed;
- conceptual; or
- dependent upon future grants, partnerships, or third-party participation?

How will those distinctions be disclosed to the public before Comprehensive Plan adoption?

18. Funding assumptions

For each transportation, water, sewer, park, or trail project referenced in the Comprehensive Plan:

- What funding source is anticipated?
- Has funding been secured?
- Is funding merely anticipated?

- Does implementation depend upon grants, SDC revenue, urban renewal revenue, state funding, federal funding, private participation, or future Council appropriations?

If funding assumptions change, how will the Comprehensive Plan be reevaluated?

19. Property-owner participation

Before selecting preferred transportation routes, trail corridors, utility corridors, or public-facility locations affecting specific properties, what opportunities will affected owners have to:

- review alternatives;
- submit information;
- suggest modifications; and
- participate before decisions become recommendations?

20. Alternatives analysis

Before identifying preferred transportation routes, trails, utility corridors, or public facilities, will the City prepare and publicly disclose alternatives analyses explaining:

- alternatives considered;
- reasons alternatives were rejected;
- costs;
- impacts to private property; and
- reasons the preferred alternative was selected?

17. Record clarity

To assist the public in understanding the relationship among these planning efforts, will the City identify, either during this workshop or before adoption, where each of the foregoing questions will ultimately be answered (e.g., Comprehensive Plan policies, findings, staff reports, Development Code, Public Facilities Plan, Capital Improvement Plan, Public Works Standards, future land-use proceedings, or separate implementation actions)?

Please confirm receipt of this email and include it in the record for the July 30, 2026 workshop.

Thank you,

Jonathan Tallman