

December 30, 2024

Project #: 29629.0

 Carly Rice  
 City of Gresham  
 1333 NW Eastman Parkway  
 Gresham, OR 97030

RE: Pleasant Valley Land Use Changes

Dear Carly:

The Pleasant Valley Plan District includes the land use districts and the transportation network for Pleasant Valley. As part of the Pleasant Valley Plan District update, the City of Gresham is establishing a town center boundary that will be recognized as a Metro 2040 town center. The new Metro 2040 town center boundary will be identical to the Pleasant Valley Town Center sub-district (TC-PV) boundary.

As part of refining the town center boundary, the land uses surrounding the town center were also reviewed and updated. Table 1 provides a summary of the proposed land use changes within the Pleasant Valley Plan District.

**Table 1: Proposed Land Use Change Summary**

Land Use		Existing (gross acres)	Proposed (gross acres)
Town Center	TC-PV	19.9	31
Mixed Employment	ME-PV	0	21.9
Employment Center	EC-PV	20.9	0
Mixed-Use Employment	MUE-PV	61.7	0
Neighborhood Commercial	NC-PV	9.9	14.1
High Density Residential	HDR-PV	45	28.1
Medium Density Residential	MDR-PV	154.5	147.9
Low Density Residential	LDR-PV	654.4	646.3
Public Land	PL-PV	0	76.4
Other		0	0.6
<b>Total</b>		<b>966.3</b>	<b>966.3</b>

Within the proposed town center area (a Metro Region 2040 center), land use changes must go through transportation review consistent with OAR 660-012-0325. Rule 0325 requires that a multimodal transportation gap summary be prepared. The City of Gresham has prepared a multimodal transportation gap summary for the areas within the proposed town center separate from this memorandum.

Outside of the proposed town center, land use changes must go through transportation review consistent with OAR 660-012-0060. Table 2 provides a summary of the land use changes outside of the proposed town center boundary.

**Table 2: Proposed Land Use Change Summary – Outside Town Center Only**

Land Use		Existing (gross acres)	Proposed (gross acres)	Change
Mixed Employment	ME-PV	0	21.9	21.9
Employment Center	EC-PV	20.9	0	-20.9
Mixed-Use Employment	MUE-PV	55.1	0	-55.1
Neighborhood Commercial	NC-PV	9.9	14.1	4.2
High Density Residential	HDR-PV	37.8	26.1	-11.7
Medium Density Residential	MDR-PV	154.5	147.9	-6.6
Low Density Residential	LDR-PV	654.4	644.7	-9.7
Public Land	PL-PV	0	76.4	76.4
Other		-0.9	0.6	1.5
<b>Total</b>		<b>931.7</b>	<b>931.7</b>	<b>0</b>

Rule 0060 states that a zone change and comprehensive plan amendment must not create an unmitigated significant effect on an existing or planned transportation system. If a significant effect is expected to occur, it must be mitigated within the planning horizon of the local Transportation System Plan. To determine whether a significant effect will occur, the trip generation associated with land uses allowed under the existing zoning was compared to those allowed under the proposed zoning for the areas outside of the proposed town center based on information provided in the *Trip Generation Manual*.

Table 3 summarizes the daily and weekday PM peak hour trips associated with the existing zoning designations. Table 4 summarizes the daily and weekday PM peak hour trips associated with the proposed zoning designations and Table 5 summarizes the net change in trip generation between the existing and proposed zoning designations.

Table 3: Trip Generation Estimate – Existing Land Use

Gresham - PV Land Use	ITE Land Use	ITE Code	Existing Acres	Buildable Acres	Units		Daily Trips	Weekday PM Peak Hour		
					Quantity	Type		Total	In	Out
Mixed Employment (ME-PV)	Business Park	770	0.0	0	-	1,000 Sq. Ft.	-	-	-	-
Employment Center (EC- PV)	Business Park	770	20.9	17	187	1,000 Sq. Ft.	2,322	228	59	168
Mixed-Use Employment (MUE-PV)	Shopping Center (>150k)	820	55.1	45	492	1,000 Sq. Ft.	18,210	1,673	803	870
	Multi-Family (Low-Rise)	220			563	Dwelling Units	3,791	287	181	106
Neighborhood Center (NC- PV)	Shopping Center (>150k)	820	9.9	8	88	1,000 Sq. Ft.	3,272	301	144	156
High Density Residential	Attached Housing	215	37.8	31	743	Dwelling Units	5,350	424	250	174
Medium Density Residential	Single-Family Detached Housing	210	154.5	127	2,027	Dwelling Units	19,115	1,905	1,200	705
Low Density Residential	Single-Family Detached Housing	210	654.4	537	4,292	Dwelling Units	40,474	4,034	2,542	1,493
<b>Total</b>							<b>92,533</b>	<b>8,851</b>	<b>5,179</b>	<b>3,672</b>

Table 4: Trip Generation Estimate – Proposed Land Use

Gresham - PV Land Use	ITE Land Use	ITE Code	Existing Acres	Buildable Acres	Units		Daily Trips	Weekday PM Peak Hour		
					Quantity	Type		Total	In	Out
Mixed Employment (ME-PV)	Business Park	770	21.9	18	196	1,000 Sq. Ft.	2,433	239	62	177
Employment Center (EC- PV)	Business Park	770	0	0	-	1,000 Sq. Ft.	-	-	-	-
Mixed-Use Employment (MUE-PV)	Shopping Center (>150k)	820	0	0	-	1,000 Sq. Ft.	-	-	-	-
	Multi-Family (Low-Rise)	220			-	Dwelling Units	-	-	-	-
Neighborhood Center (NC- PV)	Shopping Center (>150k)	820	14.1	12	126	1,000 Sq. Ft.	4,660	428	205	223
High Density Residential	Attached Housing	215	26.1	21	513	Dwelling Units	3,694	293	173	120
Medium Density Residential	Single-Family Detached Housing	210	147.9	121	1,940	Dwelling Units	18,294	1,824	1,149	675
Low Density Residential	Single-Family Detached Housing	210	644.7	529	4,229	Dwelling Units	39,879	3,975	2,504	1,471
<b>Total</b>							<b>68,960</b>	<b>6,758</b>	<b>4,093</b>	<b>2,665</b>

Table 5: Trip Generation Estimate – Net Change

Gresham - PV Land Use	ITE Land Use	ITE Code	Existing Acres	Buildable Acres	Units		Daily Trips	Weekday PM Peak Hour		
					Quantity	Type		Total	In	Out
Mixed Employment (ME-PV)	Business Park	770	21.9	18	196	1,000 Sq. Ft.	2,433	239	62	177
Employment Center (EC-PV)	Business Park	770	-20.9	-17	(187)	1,000 Sq. Ft.	(2,322)	(228)	(59)	(168)
Mixed-Use Employment (MUE-PV)	Shopping Center (>150k)	820	-55.1	-45	(492)	1,000 Sq. Ft.	(18,210)	(1,673)	(803)	(870)
	Multi-Family (Low-Rise)	220			(563)	Dwelling Units	(3,791)	(287)	(181)	(106)
Neighborhood Center (NC-PV)	Shopping Center (>150k)	820	4.2	3	38	1,000 Sq. Ft.	1,388	127	61	66
High Density Residential	Attached Housing	215	-11.7	-10	(230)	Dwelling Units	(1,656)	(131)	(77)	(54)
Medium Density Residential	Single-Family Detached Housing	210	-6.6	-5	(86)	Dwelling Units	(811)	(81)	(51)	(30)
Low Density Residential	Single-Family Detached Housing	210	-9.7	-8	(63)	Dwelling Units	(594)	(59)	(37)	(22)
<b>Total</b>							<b>(25,563)</b>	<b>(2,092)</b>	<b>(1,1085)</b>	<b>(1,007)</b>

As shown in Table 5, the proposed zone changes are expected to result in a net reduction in the trip generation potential of the areas proposed for rezone outside of the town center.

## Policy Review

Approval of proposed zone changes are dependent in part upon meeting the criteria outlined in the TPR. Table 2 summarizes the criteria identified in the TPR and their applicability to the proposed zone changes.

Table 6: TPR Criteria & Applicability Assessment

Section	Criteria	Applicable?
1	Describes how to determine if a proposed land use action results in a significant impact.	Yes
2	Describes measures for complying with Criteria #1 where a significant impact is determined.	No

3	Describes measures for complying with Criteria #1 and #2 without assuring that the allowed land uses are consistent with the function, capacity, and performance standards of the facility.	No
4	Determinations under Criteria #1, #2, and #3 are coordinated with other local agencies.	Yes
5	Indicates that the presence of a transportation facility shall not be the basis for an exception to allow development on rural lands.	No
6	Indicates that local agencies should credit developments that provide a reduction in trips.	No
7	Outlines requirements for a local street plan, access management plan, or future street plan.	No
8	Defines a mixed-use, pedestrian-friendly neighborhood	No
9	Indicates that there is not a significant affect if the proposed zoning is consistent with existing plans	No
10	Defines a multi-modal mixed-use area (MMA) and the requirements that support it.	No
11	Encourages establishment of traded-sector jobs	No

As noted in Table 2, there are three criterion that apply to the proposed zone change. The criterion are provided below in italics with our response shown in standard font.

*(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:*

*(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);*

*(b) Change standards implementing a functional classification system; or*

*(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection. If a local government is evaluating a performance standard based on projected levels of motor vehicle traffic, then the results must be based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.*

*(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;*

*(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or*

*(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.*

**Response:** Per the analysis described above, the proposed zone changes are expected to result in a net reduction in the trip generation potential of the properties proposed for rezone and therefore, will not result in a significant effect on the transportation system.

*(4) Determinations under sections (1)–(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.*

**Response:** The City of Gresham is the applicant and will coordinate with Multnomah County and ODOT as needed; however, there are no significant impacts that require coordination.

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## Conclusions

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We trust this letter provides sufficient information on the trip generation potential of the proposed zone changes outside of the town center for the Pleasant Valley Plan District update and adequately addresses the necessary approval criteria in the TPR.

Please contact us with any questions or comments.

Sincerely,

**KITTELSON & ASSOCIATES, INC.**



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