TITLE 7

COMPREHENSIVE PLAN

Chapter
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CHAPTER 1

ECHO COMPREHENSIVE PLAN

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- 7--1--1: **AUTHORITY:** Pursuant to Oregon Revised Statutes, chapters 92, 197, 215 and 227, the Statewide Planning Goals, and in coordination with Umatilla County and other affected governmental units, the City hereby adopts the City of Echo Comprehensive Plan including plan goals and policies as enumerated herein and the plan map attached to Ordinance 232-78 as Attachment "A".
- 7--1--2: **PLAN TECHNICAL REPORT**: The technical report provides the background information, facts and considerations that the City's Comprehensive Plan goals, policies and map are based on. The technical report is not adopted as part of the Plan but remains the supporting document that is subject to revision as new technical data becomes available. When new data indicates that the City's Plan should be revised, amendments shall be made as provided in Section 7--1--8 of this Chapter.
- 7--1--3: **PLAN IMPLEMENTATION MEASURES**: All plan implementation measures including but not limited to the Zoning Ordinance, Subdivision Ordinance, Mobile Home Park Ordinance, and Urban Growth Area Joint Management Agreement between the City and County, shall be consistent with and subsequent to the City Comprehensive Plan.

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- 7--1--4: **AVAILABILITY OF PLAN**: After the City Comprehensive Plan receives acknowledgment of compliance from the Oregon Land Conservation and Development Commission, the Comprehensive Plan, technical report and implementation measures shall be available for use and inspection at City Hall, Umatilla County Planning Department office in Pendleton, East Central Oregon Association of Counties, and the Department of Land Conservation and Development office in Salem.
- 7--1--5: **PLAN GOALS AND POLICIES**: The following statement of goals and policies provide a general long range basis for decision making relative to the future growth and development of the City. The goals are patterned after and are in direct response to applicable Oregon Statewide Planning Goals. The policy statements set forth a guide to courses of action, which are intended to carry out the goals of the Plan. The policy statements present the City's position on matters pertaining to physical improvements and community development.

A. Citizen Involvement

GOAL: To develop a citizen involvement program that insures opportunity for citizens to participate in all phases of the planning process.

It shall be City policy:

- 1. To conduct periodic community surveys to ascertain public opinion and collect information; tabulated survey results shall be distributed.
- 2. To encourage people to attend and participate in City Council meetings and hearings.

B. Land Use Planning

GOAL: To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

It shall be City policy:

- 1. To prepare data inventories on natural resources, man-made structures and utilities, population and economic characteristics, and the roles and responsibilities of affect governmental units.
- 2. To identify lands suitable for development and areas where development should be restricted.

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- 3. To develop economic and population projections.
- 4. To determine the land requirements for projected economic development and population growth.
- 5. To determine the public facilities an services required to accommodate existing unmet public needs and expected economic and population growth.
- 6. To revise the Comprehensive Plan and urban growth boundary for the City of Echo as necessary based on available information, citizen input, coordination and affected governmental units, and the goals and policies adopted herein.
- 7. To prepare, adopt and revise as necessary Zoning, Subdivision and Mobile Home Park Ordinances.
- 8. To establish additional policies and implementation measures consistent with the Comprehensive Plan as necessary.

C. Agricultural Lands

GOAL: To preserve and maintain agricultural lands.

It shall be City Policy:

- 1. To identify agricultural lands which should be preserved and protected from urban development.
- 2. To encourage residential, commercial an industrial development within the urban growth boundary.
 - 3. To restrict non-farm development outside the urban growth boundary.
- 4. To retain land within the urban growth area presently zoned for exclusive farm use for farming until rezoning is requested.
- D. Open Spaces, Scenic and Historic Areas, and Natural Resources

GOAL: To conserve open space and protect natural scenic, historic and cultural resources.

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It shall be City policy:

- 1. To identify open spaces; scenic, cultural and historic areas; and natural resources which should be preserved form urban development.
 - 2. To preserve the floodway of the Umatilla River as permanent open space and protect fish, wildlife and vegetation.
- 3. To preserve open space through public acquisition of suitable land and by encouraging provisions for open space in private developments.
- 4. To examine any publicly owned lands including street rights of way for their potential open-space use before their disposition.
- 5. To encourage multiple uses of open space land, provided that the uses are compatible.
 - 6. To protect archaeological and historic sites, structures and artifacts.
 - 7. To conserve the area's natural resources.
- E. Air, Water and Land Resources Quality

GOAL: To maintain and improve the quality of the air, water and land resources of Echo.

It shall be City policy:

- 1. To encourage development to locate outside floodplains, natural drainage ways, steep slopes, and other hazardous areas. (Ord. 232-78, 10-18-78)
- 2. To limit the use of land in the 100-year floodplain and floodway of the Umatilla River to open space, recreation or other appropriate uses, which minimize obstruction of flood waters and the potential loss to life or property and which comply with Federal and State regulations. (Ord. 232-78, 10-1-8-7; 1986 Code)
- 3. To investigate alternative ways to reduce the flood hazard within the City limits.
- 4. To protect the City from possible overflow from or damage to the Feed Canal and Furnish Ditch.

5. To preserve the land between the Feed Canal and furnish Ditch as permanent open space with the exception of the area adjacent to the Lexington-Echo Highway.

- 6. To preserve the land between the Union Pacific rail line and the Feed Canal north and south of the sewage lagoons as permanent open space.
- 7. To require site specific information clearly determining the degree of hazard present from applicants who seek approval to develop residential, commercial or industrial uses within known areas of natural disasters and hazards. (Ord. 232-78, 10-18-78)
 - 8. To participate in and comply with the National Food Insurance Program.
- 9. To apply flood hazard regulations to the 500-year floodplain of the Umatilla River and to the channels, borders and potential floodplains of the various creeks, draws, and gullies which extend from higher land to the north and east. (Ord. 256-84, 5-8-84)

G. Recreational Needs

GOAL: To satisfy the recreational needs of the citizens of Echo and visitors.

It shall be City policy:

- 1. To develop public meeting places and indoor recreational facilities for all age groups.
- 2. To build additional park and outdoor recreational facilities in order to meet recreational needs of residents and visitors as the community grows
- 3. To develop a community swimming pool complex as resources become available.
- 4. To require the dedication of park land or fee in lieu of for park land or facilities as part of the review and approval of subdivisions and planned unit developments.
- 5. To plan community recreation facilities in conjunction with existing and planned school facilities so that they complement each other in function.
 - 6. To maintain and improve the Echo Golf Course.
 - 7. To develop a riverside park.

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8. To encourage tourist commercial uses such as motels, restaurants, gas stations, truck stops an similar uses to cluster adjacent to the I-80N Freeway Interchange.

H. Economic Development

GOAL: To diversify and improve the economy of Echo.

It shall be City policy:

- 23. To preserve the land south of the I-80N Freeway Interchange for commercial and light industrial development and protect this area from encroachment from incompatible land uses.
- 2. To preserve the land adjacent to the Union Pacific rail line and west of the cemetery for light industrial development. (Ord. 237-78, 10-18-78)
- 3. To encourage diversified industrial development in order to provide a stable job market for City residents. (Ord. 237-78, 10-18-78; amd. Ord. 236-79)
- 4. To minimize high noise levels, heavy traffic volumes, and other undesirable effects of commercial and industrial developments.
 - 5. To provide facilities necessary to attract and serve industry.
- 6. To cooperate with and encourage the use of local manpower training agencies and programs to expand job opportunities, reduce unemployment, reduce out-migration of youth, accommodate the growth of the local labor force, and maximize the utilization of local manpower as job opportunities increase.
- 7. To develop an improvement plan for the downtown area and encourage commercial development. (Ord. 237-78, 10-18-78)
 - 23. To prepare an economic development strategy and work program. (Ord. 236-79)

I. Housing

GOAL: To increase the supply of housing to allow for population growth and to provide for the housing needs of the citizens of Echo.

It shall be City Policy:

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- 1. To encourage a moderate rate of growth.
- 2. To cooperate with agencies involved in the development of low and moderate-income housing.

- 3. To encourage future residential developments which provide prospective buyers with a variety of residential lot sizes, a diversity of housing types and a range in prices.
- 4. To establish low-density residential areas within the urban growth boundary rather that rural residential areas adjacent to, but outside the urban growth boundary.
- 23. To require that low-density residential areas, which are subdivided or partitioned, be laid out so that such areas may be further subdivided or partitioned at a later time while still insuring that necessary public facilities can be developed. Sub-areas which are equal to or greater than twelve percent (12%) slope are excepted.
- 6. To allow mobile homes in appropriate residential areas on individual lots as an outright use and mobile home parks as a conditional use.
- J. Public Facilities and Services

Goal: To plan and develop a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for urban development.

It shall be City policy:

- 1. To require property owners and developers to finance provision of urban services (water, sewer and storm drainage services and transportation infrastructure) to residential, commercial and industrial lands within the City's Urban Growth Area as these lands are urbanized.
- 2. To provide water and sewer services only within the Urban Growth Boundary (UGB) upon annexation or irrevocable consent to annex.
- 3. To discourage inefficient development without adequate public services and promote efficient use of urban and urbanizable land within the City's UGB.
- 4. To support development that is compatible with the City's ability to provide adequate public facilities and services.
- 5. To require that utilities are installed underground in all new developments and as major improvements are made to areas with above ground utilities.
- 6. To buffer the area around the cemetery from urban development. 7-1-5
- 7. To work with Umatilla County to insure adequate provision for and control of solid waste disposal sites.

- 8. To require the dedication of land, or fees in lieu of land for school sites or capital improvements as a part of the review and approval of subdivisions and planned unit developments as necessary.
- 9. To discourage development of new wells within the UGB if such wells either individually or collectively will substantially reduce the City's ability to provide a dependable source of water.
- 10. To identify approximate locations of future streets, water tank sites, and other public facilities and review development to ensure conformity with such plans.
- 11. To prioritize development of land serviced by utilities and require the extension of water, sewer and storm drainage facilities for all urban level development within the UGB.
- 12. To require the provision of necessary onsite public facilities in new subdivisions including but not limited to water, sewer, and streets.
- 13. To adopt, review, and periodically update long-range master plans for its water, sewer, storm drainage and transportation systems including identification of locations of future facilities.
- 14. To adopt and periodically update, as a supporting document to this Plan, a Public Facilities and Capital Improvement Plan for development of public services and facilities in conformance with the policies of the Comprehensive Plan.
- 15. To comply with state and federal regulations for utility systems.
- 16. To establish and maintain a range of funding mechanisms for building new water, sewer, storm drainage and transportation infrastructure and maintaining existing infrastructure.
- 17. To monitor the condition of water, sewer, storm drainage and transportation infrastructure and finance regular maintenance of these facilities subject to fund availability.
- 18. To establish and maintain utility rates and user fees that equitably allocates costs for operations and maintenance to users.
- 19. To consider a variety of tools to finance new water and wastewater infrastructure7-1-5J)

as allowed by State law and adjust rates to keep up with current costs.

20. To maintain an 8-year supply of commercial and industrial land that is serviceable by

water, sewer, storm drainage and transportation infrastructure.

- 21. To work with the State and County to protect its water supply and enhance groundwater quality and quantity particularly within the City limits to establish wellhead protection measures as appropriate; work with landowners and managers for protection of water sources; and adhere to applicable permitting requirements when approving new residential, commercial and industrial development and when constructing new water, sewer, storm drainage and transportation infrastructure.
- 22. If soil conditions and density deem necessary, to require developers to complete storm drainage studies reviewed for acceptability by the City. The City intends to provide standards for storm drainage detention and management facilities for management of urban storm runoff and to augment flood control by requiring on-site treatment of storm water runoff.
- 23. To take steps to minimize adverse impacts from construction and other sources of erosion and sedimentation on natural drainage ways and storm drainage facilities by requiring developers to provide plans acceptable to the City for onsite storm water treatment.
- 24. To allow for safe, orderly and coordinated development as described above, the City intends to adopt appropriate utility and transportation design standards and construction specifications.

PROJECT LISTS

The following project titles are taken from the Public Facility Plan project list and capital improvement plan. Estimated locations, costs and timing are also included in the Public Facility_Plan. The adoption of this project list into the Comprehensive Plan provides an estimate of the infrastructure improvements needed to serve urban development in the Echo urban growth boundary for the planning period. The adoption of this list does not constitute a pledge on the part of the City or other service providers to build the projects, to secure public funding for the projects, or to obligate present or future elected bodies to pursue the development of listed projects. Securing necessary public and/or private funding for the design and construction of these projects is independent of the Comprehensive Plan. For full list, time schedule and cost of improvement, see June 2001 Public Facilities Plan, Capital Improvement Plans (pages 15 – 18).

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Water System

- 23. Water System Master Plan
- 24. New Well Construction

25.	Booster system upgrades	
26.	Storage tank	
27.	Chlorination	
28.	Recoating	
29.	Rate Study	
30.	Transmission line improvements	
31.	Expansion of transmission line to serve commercial and industrial development	
Sewer System		
23.	Wastewater System Master Plan	
24.	New cell/ lagoon	
25.	Treatment system upgrades based upon Master Plan	

Distribution system improvements/ upgrade based upon Master Plan

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<u>Transportation System</u>

26.

27.

28. 29. Sludge removal from lagoons

Outfall line

Rate Study

23. Pave southeast sections of Jane, Hiestand and College Streets

- 24. Pave sections of Front, Buckley and Dale Streets
- 25. Pave sections of Dupont, Halstead and Kennedy Streets
- 26. Upgrade multi-use path between Buckley St. and the Lexington-Echo Hwy
- 27. Establish bike lanes, with signing and striping, along the Lexington-Echo Hwy, between Main and Gerone St.
- 28. Pave east sections of Willow, Sprague, Main, Bridge and Buckley Streets
- 29. Umatilla County Roadway Project
- 30. Construct a multi-use path along south side of Main Street between Thielsen Street and east end of existing sidewalk.
- 31. Reconstruct sidewalk on south side of Buckley Street between Dale Street and the multi-use path
- 32. Construct an integrated multi-use path system along the Feed and Furnish Ditches
- 33. Repave Dupont St. between Thielsen and Bridge
- 34. Repave Bridge St. between Front and dead end
- 35. Repave Bonanza St. between Garden and Halstead
- 36. Repave Kennedy St. between Dupont and RR tracks
- 37. Construct, repair, or replace sidewalks within the city limits
- 38. Construct a multi-use path along Thielsen Road between I-84 and the city limits
- 39. Construct multi-use path along north side of Gerone Street between Thielsen Street and Golf Course road
- 40. Umatilla County Pathway Project

Storm Drainage System

23. Storm Drainage Master Plan

CAPITAL IMPROVEMENT PLAN MAPS

Comprehensive Plan maps showing the locations of planned water and sewer improvements respectively are attached. Maps of planned transportation system improvements are included in the City's June 2001 Transportation System Plan. (ord. 330-1)

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K. Transportation

GOAL: To provide and encourage a safe, convenient, and economic transportation system.

- 1. Ensure that the road system within the City and urban area is adequate to meet public needs, including the needs of the transportation disadvantaged.
 - A. Develop a city transportation plan.
 - B. Meet identified maintenance level of service standards on the county and state highway systems.
 - C. Review and revise, if necessary, street cross-section standards for local, collector, and arterial streets to enhance safety and mobility.
 - D. Develop access management strategies where needed.
 - E. Evaluate the need for traffic control devices.
 - F. Analyze the safety of traveling speeds and consider modifying posted speeds as necessary.
 - G. Evaluate the operation and safety of the street system.
 - H. Encourage the provision of transportation alternatives for elderly and handicapped citizens.
- 23. Preserve the function, capacity, level of service, and safety of existing and planned

roadways.

- A. Develop access management standards.
- B. Develop alternative, parallel routes.
- C. Promote alternative modes of transportation.
- D. Promote transportation demand management programs.
- 23. Promote transportation system management.
- 3. Develop procedures to minimize impacts to and protect transportation facilities, corridors, or sites during the development review process.
- 4. Improve coordination among Umatilla County, ODOT, the US Forest Service (USFS), the Federal Highway Administration (FHWA), and the city.
 - 23. Cooperate with ODOT in the implementation of the Statewide Transportation Improvement Program (STIP).
 - B. Work with Umatilla County to coordinate roadway maintenance and improvements and to develop joint policies concerning local roads and streets within the Urban Growth Boundary.

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- C. Work with the county in establishing cooperative road improvement programs and schedules.
- D. Work with the county in establishing the right-of-way needed for new roads identified in the transportation

- system plan.
- E. Take advantage of federal and state highway funding programs.
- F. Encourage the county and ODOT to improve the existing road system to and within the City.
- G. Consider pooling resources with other cities and the county to provide services the benefit areas both inside and outside the City.
- 5. Increase the use of alternative modes of transportation (walking, bicycling, and public transportation) through improved access, safety and service.
 - 23. Provide sidewalks or shoulders and safe crossings on collectors and arterials.
 - B. Amend and implement a city bicycle plan.
 - 23. Seek Transportation and Growth Management (TGM) and other funding for projects evaluating and improving the environment for alternative modes of transportation.
 - 24. Cooperate with other cities and the county to pursue inter-city transit service opportunities.
 - 25. Utilize local improvement districts (LID's) when possible to provide sidewalks and curbs for local neighborhoods.

It shall be City policy:

- To repave city streets and provide curbs and sidewalks as resources are available.
- To encourage the Union Pacific Railroad to landscape its right-of-way through the City.
- To encourage Umatilla County to improve County Road No. 848 between the City and the I-84 Freeway Interchange and to plan for adequate access to adjacent property.
- To work with Umatilla County to develop joint policies concerning local roads and streets within the urban growth boundary.
- To coordinate with the Oregon Department of Transportation (ODOT) to implement the highway improvements listed in the

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Statewide Transportation Improvement Program (STIP) that are consistent with the Transportation System Plan and the city Comprehensive Plan.

- 28. To consider the findings of ODOT's draft Environmental Impact Statements and Environmental Assessments as integral parts of the land use decision-making procedures. Other actions required, such as a goal exception or plan amendment will be combined with review of the draft EA or EIS and land use approval process.
- 29. To acknowledge that the Echo Transportation System Plan is an element of the Comprehensive Plan. It identifies the general location of transportation improvements. Changes in the specific alignment of proposed public road and highway projects that shall be permitted without plan amendment if the new alignment falls within a transportation corridor identified in the Transportation System Plan.
- To allow operation, maintenance, repair, and preservation of existing transportation facilities without land use review, except where specifically regulated.
- To allow dedication of right-of-way, authorization of construction, and the construction of facilities and improvements, for projects authorized in the Transportation System Plan, the classification of the roadway and approved road standards without land use review.
- To allow changes in the frequency of transit, rail and airport services that are consistent with the Transportation System Plan without land use review.
- To acknowledge that for State projects that require an Environmental Impact Statement (EIS) or Environmental Assessment (EA), the draft EIS or EA shall serve as the documentation for local land use review, if local review is required.
 - A. Where the project is consistent with the Transportation System Plan, formal review of the draft EIS or EA and concurrent or subsequent compliance with applicable development standards or conditions;
 - B. Where the project is not consistent with the Transportation System Plan, formal review of the draft EIS or EA and concurrent completion of necessary goal exceptions or plan amendments.

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12. To protect the function of existing and planned roadways as identified in the Transportation System Plan.

- 13. To include a consideration of a proposal's impact on existing or planned transportation facilities in all land use decisions.
- 14. To protect the function of existing or planned roadways or roadway corridors through the application of appropriate land use regulations.
- 15. To consider the potential to establish or maintain access ways, paths, or trails prior to the vacation of any public easement or right-of-way.
- 16. To preserve right-of-way for planned transportation facilities through exactions, voluntary dedication, or setbacks.
- 17. To plan and develop a network of streets, access ways, and other improvements, including bikeways, sidewalks, and safe street crossings to promote safe and convenient bicycle and pedestrian circulation within the community.
- 18. To require streets and access ways where appropriate to provide direct and convenient access to major activity centers, including downtown, schools, shopping areas, and community centers.
- 19. To investigate the existing and future opportunities for bicycle and pedestrian access ways in areas of new development. Many existing access ways such as user trails established by school children distinguish areas of need and should be incorporated into the transportation system.
- 20. To include bikeways on all new arterials and collectors within the Urban Growth Boundary except on limited access freeways.
- 21. To proceed with retrofitting existing arterials and collectors with bike lanes on a prioritized schedule as appropriate and practical (i.e., bike lanes may not be appropriate in downtown core areas where it would require the removal of parking).
- 22. To include sidewalks on all new streets within the Urban Growth Boundary except on limited access freeways.
- 23. To proceed with retrofitting existing streets with sidewalks on a prioritized schedule.

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24. To give priority to developing access ways to major activity centers within the Echo Urban Growth Boundary, such as the downtown commercial center, schools, and community centers.

- 25. To connect bikeways and pedestrian access ways to local and regional travel routes.
- 26. To design and construct bikeways and pedestrian access ways to minimize potential conflicts between transportation modes. Design and construction of such facilities shall follow the guidelines established by the Oregon Bicycle and Pedestrian Plan.
- 27. To give maintenance and repair of existing bikeways and pedestrian access ways (including sidewalks) equal priority to the maintenance and repair of motor vehicle facilities
- 28. To provide bicycle parking facilities at all new residential multifamily developments of four units or more, commercial, industrial, recreational, and institutional facilities. (ord. 326-01)

L. Energy Conservation

GOAL: To conserve energy and develop and use renewable energy resources.

It shall be City policy:

- 1. To revise the Zoning Ordinance to protect solar access.
- 2. To encourage orientation and design of new streets and buildings to allow for utilization of solar energy and provision of landscaping to provide summer cooling.
- 3. To design the extension and upgrading of water and sewer lines and facilities to minimize energy use.
- 4. To encourage building owners to insulate their buildings to conserve energy and reduce operating costs.

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M. Urbanization

GOAL: To provide for an orderly and efficient transition from rural to urban land use.

It shall be City policy:

- 1. To establish an urban growth boundary to identify and separate urbanizable land from rural land.
- 2. To develop a cooperative process between Echo and Umatilla County for the establishment and change of the urban growth boundary.
- 3. To first consider land in the designated expansion area for inclusion within the urban growth boundary.
- 4. To consider only those areas that are within the urban growth boundary for annexation to the City.
- 5. To work with Umatilla County to develop policies and regulations to manage land development within the urban growth boundary outside City limits.
- 6. To tax land within the urban growth boundary based on current use and market value.

7--1--6: PLAN AND IMPLEMENTATION MEASURE REVIEW:

The City Comprehensive Plan and implementation measures shall be reviewed at least annually to determine conformity with changes in:

Oregon Revised Statutes and administrative rules;

Oregon case law;

Oregon Statewide Planning Goals;

Requirements of the City;

Needs of residents or landowners within the City or urban growth area; and

Concerns of the County and other affected governmental units.

If the City Comprehensive Plan, implementation measures, or both fail to conform to any of the above criteria, the nonconforming document(s) shall be amended as necessary and as soon as practicable. (Ord. 232-78, 10-18-78)

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7--1--7: **PLAN AMENDMENT APPLICATIONS:** An amendment to the text of this Chapter or to the Comprehensive Plan map may be initiated by the City Council, an affected governmental unit, or by a property owner or resident of the City or urban growth area. An owner of property located within a designated expansion area may apply for amendment of the urban growth boundary. All applications for plan amend-ments shall be made on forms available from the City accompanied by a fee in an

amount established by the City Council. (Ord. 236-79)

- 7--1--8: **PLAN AMENDMENT:** After the City Council determines that proposed amendments should be considered, amendment of the Comprehensive Plan shall be based on the following procedure and requirements:
- A. The City Council shall set a public hearing date and give notice thereof through a newspaper of general circulation in the City at least ten (10) days prior to the hearing and if applicable, notice shall be mailed to:
 - 1. Property owners within tow hundred fifty feet (250') of land subject to a proposed amendment to the Plan map; and
 - 2. Affected governmental units which may be impacted by or who have requested opportunity to review and comment on proposed amendments.
- B. Copies of proposed amendments shall be made available for review at least ten (10) days prior to the City Council hearing.
- C. Within ten (10) days after the close of the City Council hearing, the City Council shall make findings of fact and adopt, adopt with changes, or deny the proposed amendments. Adoption of Plan amendments is effective upon;
 - 1. City adoption in the case of amendment of the Plan map for an area within the City limits.
 - 2. County adoption in the case of amendment of Plan policies or the Plan map for the urban growth area; and
 - 3. County adoption and Land Conservation and Development Commission approval in the case of amendment of Plan goals or urban growth boundary location.
- D. Copies of Plan amendments adopted by the City shall be sent to the county and the Land Conservation and Development Commission within ten (10) days after adoption. (Ord. 232-78, 10-18-78).