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## MEMORANDUM

To: Echo City Council and members of the Public Advisory Committee  
cc. Dave Slaght, City Manager  
From: Carla McLane, Contract Planner  
Date: May 26, 2025  
RE: Overview of Planning Document Update

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This memorandum is provided as an outline for the Joint Work Session to walk the combined group through the work that the Public Advisory Committee, or PAC, has undertaken over the past 10 months.

### **Packet Arrangement:**

The following groupings of the documents were suggested generally based on the implementation hierarchy. That means that the Comprehensive Plan is the guidance document that includes some limited narrative on certain subjects, findings, and city policy; followed by the Development Code that outlines your regulatory framework; and finally the Zoning Map which identifies where certain types of activities can occur.

#### Comprehensive Plan:

- Comprehensive Plan staff report (05182025) – the formal analysis of the Comprehensive Plan against the current criteria for amendment.
- 7 Comprehensive Plan FINAL REDLINE (05182025) – the redline of the current Title 7 showing all of the proposed changes.
- 7 Comprehensive Plan CLEAN (05182025) – a clean version of Title 7 to allow for easier reading of the proposed Comprehensive Plan.

#### Development Code:

- Development Code staff report (05182025) – the formal analysis of the development code provisions found in Titles 8 and 9 against the current criteria for amendment.
- Subdivision and Zoning Audit FINAL (05182025)
- 6 Building Regulations STRIKEOUT – provisions proposed to be removed.
- 8 Subdivision Administrative Regulations STRIKEOUT – provisions proposed to be replaced.
- 9 Zoning Administration STRIKEOUT – provisions proposed to be replaced.
- Echo Chapter 1 DRAFT (05182025) – provisions proposed to be adopted.
- Echo Chapter 2 DRAFT (05182025) – provisions proposed to be adopted.
- Echo Chapter 3 DRAFT (05182025) – provisions proposed to be adopted.
- Echo Chapter 4 DRAFT (05182025) – provisions proposed to be adopted.
- Echo Chapter 5 DRAFT (05182025) – provisions proposed to be adopted.

### Zoning Map:

- Zoning Map staff report (05182025) – the formal analysis of the Zoning Map against the current criteria for amendment.
- Draft Proposed Zoning Map (Aerial Basemap)
- Draft Proposed Zoning Map (Streets Basemap)

### **Overview of the Update:**

The following attempts to simply outline the proposed amendments.

**Development Code:** It is important to begin this discussion by reviewing the guidance and regulations that are currently in place. You can find that by reviewing the three documents that are shown in STRIKEOUT coupled with the Subdivision and Zoning Audit. The City of Echo has significant regulations in place found in your current Titles 8 Subdivision Administrative Regulations and 9 Zoning Administration. The Audit that was completed early in the process was completed after a review of those two Titles and a conversation with Jacob Foutz, previous City of Umatilla Senior Planner who provided planning services for the City of Echo. The Audit outlines several concerns that include inconsistencies with current Oregon Revised Statutes (ORS), requirements in Titles 8 and 9 that conflict with each other, and a regulatory framework that does not align with current accepted planning practice.

Based on that review it was suggested that the City of Echo pursue implementation of the model code that was designed for small cities. This recommendation was based on those factors outlined above – the model code was consistent with ORS and Oregon Administrative Rules (OAR), it would eliminate the inconsistencies found in the current Titles 8 and 9, and it would provide a regulatory framework that was based in commonly accepted planning practices.

**Comprehensive Plan:** For the Comprehensive Plan a different approach was taken as these documents have more flexibility and are grounded in the 14 statewide planning Goals, less in ORS or OAR. They can age better but should still be regularly reviewed and updated when findings or policy needs to better reflect current practice or newly desired regulation. That does not mean that the Comprehensive Plan did not need some significant work to better reflect the Echo of 2025. It was recommended that project lists be removed, that findings be more robust, and that the policy statements reflect the current desires of the City Council and community. Comprehensive Plans are not regulatory documents but provide the basis for the regulation that is then found in the Development Code.

**Zoning Map:** At the end of this process there is not a lot of change proposed to the Zoning Map. It is important to note that the map being relied on by city staff has been the 1978 Comprehensive Plan map which did not accurately reflect current zoning, or what was perceived to be the current zoning. The proposed map does reflect the recommendation that the City of Echo, following current Department of Land Conservation and Development (DLCD) advise, collapse the Residential zoning district to just one and review residential uses based on impacts. This would allow single-family dwellings, multi-family development, other residential uses, and certain other uses (schools, parks, cemeteries, and golf courses) to occur within the Residential use zone. This will be most impactful on the recently annexed Madison property which lies west of the Northgate tourist commercial and light industrial development.

### **Summary of Changes:**

The following is a Summary of Changes that would outline what the eventual action would be by the City Council. This section starts with, in some respects, the easiest component and works through to the most involved.

Zoning Map Changes: The following bullets summarize the proposed changes and outline one area of conflict from the Public Advisory Committee that will need to be resolved.

- The proposed Zoning Map does reflect the identified zoning that was or will be applied to the recently annexed territory in the Northgate area to include Tourist Commercial, Light Industrial, and Residential.
- The proposed Zoning Map removed the “Public and Semi-Public” designation converting those areas to either residential or commercial. The places affected by this change include the cemetery, school property, and golf course which are proposed to be zoned Residential with the city hall, fire station, and park proposed to be Commercial.
- There is a large amount of “Permanent Open Space” that is in private ownership. Open Space is generally owned by public entities – cities or counties, special districts, state or federal agencies, or other public groups. Open Space, by its generally accepted definition, is not owned by private individuals. That is not the case in the City of Echo where most of the “Permanent Open Space” on the 1978 Comprehensive Plan Map is in private ownership. There are three areas that “Permanent Open Space” is applied – northwest of the older part of the city along the Umatilla River, south of the older part of the city also along the Umatilla River, and the area between the two canals. This all but eliminates those private property owners from using that land for a beneficial purpose. The PAC was split on this issue which does need to be addressed prior to final adoption of the Zoning Map. At this point all three areas are reflected as “Open Space” with the PAC supportive of the two areas along the Umatilla River remaining as “Open Space” as both are impacted by the mapped flood plain. But they are divided on the area between the two canals.

Comprehensive Plan Changes: The following is a summary of the proposed changes.

- The first four sections of the Comprehensive Plan provide an introduction and explain the City’s authority to adopt the Plan, generally describe the Plan’s Purpose and its Implementation, identify technical reports that support the Plan, and discuss the availability of the Plan. These four sections have been updated to reflect current law and recent technical reports that have been drawn upon.
- Section 5 begins the heart of the Comprehensive Plan with a short introduction that talks a bit about the goals, findings, and policies that are contained within the Plan. Each statewide planning goal then follows reflecting the order that they are codified in ORS and OAR.
  - Goal 1 reflects additional description of the goal, a findings statement, and additional policies.
  - Goal 2 has a findings statement and updated policies that reflect current requirements within ORS and OAR for how planning is accomplished.
  - Goal 3 is amended to better reflect the city’s purpose in providing land for residential, commercial and industrial purposes and clarifying that the county’s role is in the preservation of land used for agricultural purposes.
  - Goal 4 is incorporated to reflect the lack of forest lands within the city, but also acknowledging participation in the Tree City USA program.
  - Goal 5 is amended to include narrative related to wetlands, riparian areas, water resources, and historic areas. Several findings were added to support these Goal 5 resources and others. The same was done with the policy statements.
  - Goal 6 was amended to remove flood plain commentary to Goal 7 where it is a better fit. A findings statement was added with the policy statements amended to better align with the intent of Goal 6.
  - Goal 7 was updated to include the flood plain requirements with two findings statements added and several policies that address the flood plain. There are at least two policy statements that the PAC where in disagreement about retaining

that should be discussed and resolved prior to adoption. Those are policy statements 4 and 5.

- Goal 8 has added information about the Golf Course, several findings statements, and updated policy statements.
- Goal 9 has added information about the purpose of Goal 9, added findings statements, and updated policy statements. A new policy statement was added to support the historic preservation or presence that was identified in the Northgate amendments.
- Goal 10 was updated to reflect the work from 2019 when the City of Echo participated in a regional effort that resulted in a Housing Study that concluded with a Housing Strategies Report. The findings from that effort are included with the policy statements also updated to reflect that work.
- Goal 11 was updated to include a listing of the various public facilities and services within the community. Findings have been added with the policy statements modernized. Public facility project lists were removed as they are better housed in a Capital Improvement Plan or within the specific water, wastewater, or other facility plans.
- Goal 12 was updated to reflect both the Transportation System Plan (TSP) and the Interchange Access Management Plan (IAMP) adopted in 2001 and 2006, respectively, which account for the findings statements. The previous 35 policy statements are replaced with the 7 that are housed within the TSP and IAMP.
- Goal 13 is updated to include narrative to better explain its purpose, includes two findings statements, with the addition of six policy statements to better utilize this goal.
- Goal 14 governs how a city grows. An explanation of the Goal is added, a finding statement is added, and the policy statements are replaced with a stronger focus on Echo's growth.
- The last three sections define what would trigger a review of the Comprehensive Plan, provide for how an update or amendment would be accomplished, and ends with a severability clause that is protective of the document in parts should any part of it be challenged in a court of competent jurisdiction.

Development Code: As discussed previously the suggested approach for the Development Code was to replace in its entirety Titles 8 and 9 with five new Chapters that would comprise all the city's regulations related to development including the division of land. The Audit that was included in the packet provides a summary of the issues and concerns with the current set of regulations. To provide a "summary of changes" what follows is a summary of each of the five proposed chapters as found in the Development Code staff report:

- Chapter 1 General Administration: This chapter introduces the Development Code, provides definitions, and briefly describes how enforcement can occur.
- Chapter 2 Land Use Districts: This chapter discusses the various land use zones or districts, providing for uses and outlining initial development criteria for each.
- Chapter 3 Design Standards: This chapter provides guidance on how development should occur related to access, landscaping, parking, public services, flood plain regulations, and other similar considerations.
- Chapter 4 Administration of Land Use and Development Permits: This chapter is the 'how to' chapter providing the framework for how permits will be reviewed and approved. It covers development review, partitioning, conditional uses, and master planning.
- Chapter 5 Exceptions to Code Standards: This chapter provides the processes that can be used when a variance may need to be granted as well as provides guidance for non-conforming uses.

**Conclusion:**

The City of Echo has not completed a review of its planning documents for many years, which is not uncommon for small cities with limited resources. It is also true that there was limited growth for many of those years and the Comprehensive Plan and development provisions were most likely adequate for the development that was occurring. Recent regional growth has seen opportunities emerge in Echo, that is leading to the development of the Northgate area, which will include tourist commercial, light industrial, and now residential development. An updated Comprehensive Plan, Development Code, and Zoning Map will provide a framework for development that is consistent with ORS, OAR, and current planning practice in Oregon.

It should also be noted that this process has provided a level of education to a segment of the citizenry of Echo that could support the formation of a Planning Commission. Four of the six PAC members could be appointed to a five-member Planning Commission, leaving just one vacancy to be filled, resulting in an appointed group with significant knowledge about the development requirements within the city. This action should be done thoughtfully but would allow for a clear delineation of duties between the Planning Commission as a quasi-judicial decision-making body and the City Council as the legislative decision-making body.