



2025 Compliance Report

January 7, 2026

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Executive Summary

Metro Code chapter 3.07 (the “Urban Growth Management Functional Plan” or “UGMFP”) and chapter 3.08 (the “Regional Transportation Functional Plan” or “RTFP”) provide standards, tools, and guidance for local land use plans, transportation system plans, and implementing regulations that are necessary to advance the regional vision, goals, and policies of Metro’s Regional Framework Plan and the 2040 Growth Concept.

As required annually by Metro Code subsection 3.07.870(a), the 2025 Compliance Report summarizes the status of compliance with the UGMFP for each city and county in the region.¹ To better connect land use planning with transportation planning, this report also includes information on local government compliance with the RTFP.

Most jurisdictions are in compliance with the UGMFP, with the exception of a few jurisdictions that continue to work to satisfy UGMFP Title 11 requirements related to planning for areas previously added to the urban growth boundary (UGB).

Per the Metro Code and if requested, the Chief Operating Officer (COO) may grant formal extensions to deadlines for meeting UGMFP requirements if a local government meets one of two criteria: the city or county is making progress towards compliance; or there is good cause for failure to meet the deadline for compliance. In 2025, there were no requests for extensions of compliance dates for the UGMFP. Nonetheless, this report notes that progress is being made by cities and counties to address listed deficiencies.

Similarly, per the Metro Code, the COO may grant formal exemptions to meeting RTFP requirements if the COO finds the following: the city or county’s transportation system is generally adequate to meet transportation needs; little population or employment growth is expected over the period of the exemption; the exemption would not make it more difficult to accommodate regional or state transportation needs; and the exemption would not make it more difficult to achieve the performance objectives set forth in Section 3.08.010(A) of the RTFP. In 2025, there were no requests for exemptions for the RTFP. All jurisdictions are in compliance with their respective RTFP requirements.

The following page describes the four appendices included in this compliance report.

¹ Metro Code subsection 3.07.870(a) requires Metro’s COO to submit the report to the Metro Council by March 1 and to send a copy of the report to MPAC, JPACT, PERC, and each city and county within Metro.

Appendix A summarizes the compliance status for all local governments with each title of the UGMFP, as of December 31, 2025.

Appendix B provides further details on the status of compliance with UGMFP Title 11 new urban area planning for areas added to the UGB since 1998, as of December 31, 2025.

Appendix C summarizes local jurisdictions' compliance with the RTFP, as of December 31, 2025.

Appendix D is the report required by Metro Code subsection 3.07.450(k) on amendments made in 2025 to the UGMFP Title 4 Employment and Industrial Areas Map (also known as the "Industrial and Other Employment Areas Map" and the "Title 4 Map").²

² Subsection 3.07.450(k) requires the COO to submit a written report to the Metro Council and MPAC by January 31 of each year on the cumulative effects on employment land in the region of the amendments made to the Title 4 Map the preceding year. The report must include any recommendations the COO deems appropriate on measures the Council might take to address the effects.

APPENDIX A
Summary of Urban Growth Management Function Plan (UGMFP)
Compliance Status as of December 31, 2025

City/ County	Title 1 <i>Housing Capacity</i>	Title 3 <i>Water Quality and Flood Management</i>	Title 4 <i>Industrial and other Employment Land</i>	Title 6 <i>Centers, Corridors, Station Communities and Main Streets</i>	Title 7 <i>Housing Choice</i>	Title 11 <i>Planning for New Urban Areas</i> (See Appendix B for details)	Title 13 <i>Nature in Neighborhoods</i>
Beaverton	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Cornelius	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Durham	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Fairview	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Forest Grove	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Gladstone	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Gresham	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Happy Valley	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Hillsboro	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Johnson City	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
King City	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Lake Oswego	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Maywood Park	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Milwaukie	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Oregon City	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Portland	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Rivergrove	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Sherwood	In compliance	In compliance	In compliance	In compliance	In compliance	Not in compliance	In compliance
Tigard	In compliance	In compliance	In compliance	In compliance	In compliance	Not in compliance	In compliance
Troutdale	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Tualatin	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
West Linn	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Wilsonville	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance	In compliance
Wood Village	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Clackamas County	In compliance	In compliance	In compliance	In compliance	In compliance	Not in compliance	In compliance
Multnomah County	In compliance	In compliance	In compliance	In compliance	In compliance	Not applicable	In compliance
Washington County	In compliance	In compliance	In compliance	In compliance	In compliance	Not in compliance	In compliance

APPENDIX B
Status of Compliance with UGMFP TITLE 11, *Planning for New Urban Areas*,
as of December 31, 2025

Project	Lead Government(s)	Title 11 Compliant?	Status
1998 UGB Expansion			
Rock Creek	Happy Valley	Yes	Planning completed; mostly annexed and developed
Pleasant Valley	Gresham, Happy Valley, Portland	Yes	Planning completed; a portion annexed by each city, with development ongoing
1999 UGB Expansion			
Witch Hazel Village	Hillsboro	Yes	Planning completed; majority annexed and developed
2000 UGB Expansion			
Villebois Village	Wilsonville	Yes	Planning and annexation completed; development almost complete
2002 UGB Expansion			
Springwater	Gresham	Yes	Planning completed; some limited annexations and development
Damascus/Boring	Happy Valley	Yes	Happy Valley portion: Planning completed for a large portion (see below); development ongoing
	Clackamas County, Happy Valley	No	Former City of Damascus land area: Happy Valley adopted a Title 11 compliant comprehensive plan (Pleasant Valley / North Carver Comprehensive Plan) for approximately 2,700 acres of the area, and the County and the City have an Urban Growth Management Agreement for the City to do comprehensive planning for additional portions of the area
	Gresham	Yes	Gresham portion: Kelley Creek Headwaters Plan completed; some limited annexations and development
Park Place	Oregon City	Yes	Planning completed; portion annexed and under development
Beaver Creek Rd	Oregon City	Yes	Planning completed; portion annexed with development applications under review
South End Rd	Oregon City	Yes	Planning completed; waiting annexation and development
East Wilsonville (Frog Pond West)	Wilsonville	Yes	Planning completed; mostly annexed, with development ongoing
NW Tualatin (Cipole Rd and 99W)	Tualatin	Yes	Planning completed; waiting annexation and development
SW Tualatin	Tualatin	Yes	Planning completed; limited annexation and development
Brookman Rd	Sherwood	Yes	Planning completed; nearly half annexed and developing
West Bull Mountain (River Terrace 1.0)	Tigard	Yes	<i>See Roy Rogers West (River Terrace 1.0) with 2011 expansion</i>
Study Area 59 (Elwert Rd)	Sherwood	Yes	Planning and annexation completed; development almost complete
Study Area 61 (Cipole Rd)	Sherwood	No	Awaiting planning and annexation
Adams Rd / Langer Farms Pkwy	Sherwood	Yes	Planning and annexation complete; fully developed
West of 99W (north of Roy Rogers Rd)	Sherwood	No	Awaiting planning and annexation

APPENDIX B (continued)
Status of Compliance with UGMFP TITLE 11, *Planning for New Urban Areas*,
as of December 31, 2025

Project	Lead Government(s)	Title 11 Compliant?	Status
North Cooper Mountain	Washington County	No	Preliminary planning completed by City of Beaverton in conjunction with Washington County; Future discussions of comprehensive and urban services planning will be informed by Beaverton's Cooper Mountain Community plan and its related Cooper Mountain Utility Plan
Study Area 64 (14 acres north of Scholls Ferry Rd)	Beaverton	Yes	Planned, annexed, and developed
Study Areas 69 and 71	Hillsboro	Yes	Planning completed as part of South Hillsboro; portion annexed and developed
Study Area 77 (Baseline St)	Cornelius	Yes	Planning and annexation completed; development ongoing
Forest Grove Swap	Forest Grove	Yes	Planned, annexed, and developed
Shute Road	Hillsboro	Yes	Planning and annexation completed; developed
North Bethany	Washington County	Yes	Planning completed; majority developed
Bonny Slope West (Area 93)	Washington County	Yes	Planning completed; development ongoing
2004/2005 UGB Expansion			
Damascus area	Clackamas County	See 2002 above	<i>See Damascus/Boring 2002 expansion above</i>
Tonquin	Sherwood	Yes	Planning completed; majority annexed, with development ongoing
Basalt Creek / West RR Area	Tualatin, Wilsonville	Yes	Planning completed; approximately 30-45% of Tualatin portion annexed, with development almost complete east of Boones Ferry
North Holladay	Cornelius	Yes	Planning completed; waiting annexation and development
Evergreen	Hillsboro	Yes	Planning completed; majority annexed, with development ongoing
Helvetia	Hillsboro	Yes	Planning completed; majority annexed, with development ongoing
2011 UGB Expansion			
North Hillsboro	Hillsboro	Yes	Planning completed; annexation and development ongoing
South Hillsboro	Hillsboro	Yes	Planning completed; annexation and development ongoing
South Cooper Mountain	Beaverton	Yes	Planning and annexation completed; development ongoing
Roy Rogers West (River Terrace 1.0)	Tigard	Yes	Planning completed; annexation and development ongoing

APPENDIX B (continued)
Status of Compliance with UGMFP TITLE 11, *Planning for New Urban Areas*,
as of December 31, 2025

Project	Lead Government(s)	Title 11 Compliant?	Status
2014 UGB Expansion (HB 4078)			
Cornelius North	Cornelius	Yes	Planning completed; small portion annexed and developed
Cornelius South	Cornelius	Yes	Planning completed; mostly annexed and developed
Forest Grove (Purdin Rd)	Forest Grove	Yes	Planning completed; about half annexed and developed
Forest Grove (Elm St)	Forest Grove	Yes	Planning and annexation completed; waiting development
Hillsboro (Jackson East)	Hillsboro	Yes	Planning completed; majority annexed, with development ongoing
2017 UGB Expansion			
Sherwood High School	Sherwood	Yes	Planning and annexation completed; fully developed
2018 UGB Expansion			
Cooper Mountain	Beaverton	Yes	Planning completed; waiting annexation and development
Witch Hazel Village South	Hillsboro	Yes	Planning completed; about half annexed, with development ongoing
Beef Bend South (Kingston Terrace)	King City	Yes	Planning completed; about half annexed, with development ongoing
Advance Road (Frog Pond East and South)	Wilsonville	Yes	Planning completed; waiting annexation and development
2023 UGB Amendment ("Exchange")			
River Terrace 2.0	Tigard	No	Planning expected to be completed in early 2027
2024 UGB Expansion			
Sherwood West	Sherwood	No	Awaiting planning and annexation

APPENDIX C
Summary of Regional Transportation Functional Plan (RTFP)
Compliance Status as of December 31, 2025

City/County	Title 1 <i>Transportation System Design</i>	Title 2 <i>Development and Update of Transportation System Plans</i>	Title 3 <i>Transportation Project Development</i>	Title 4 <i>Regional Parking Management</i>	Title 5 <i>Amendment of Comprehensive Plans</i>
Beaverton	In compliance	In compliance	In compliance	In compliance	In compliance
Cornelius	In compliance	In compliance	In compliance	In compliance	In compliance
Durham	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034
Fairview	In compliance	In compliance	In compliance	In compliance	In compliance
Forest Grove	In compliance	In compliance	In compliance	In compliance	In compliance
Gladstone	In compliance	In compliance	In compliance	In compliance	In compliance
Gresham	In compliance	In compliance	In compliance	In compliance	In compliance
Happy Valley	In compliance	In compliance	In compliance	In compliance	In compliance
Hillsboro	In compliance	In compliance	In compliance	In compliance	In compliance
Johnson City	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034
King City	In compliance	In compliance	In compliance	In compliance	In compliance
Lake Oswego	In compliance	In compliance	In compliance	In compliance	In compliance
Maywood Park	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034
Milwaukie	In compliance	In compliance	In compliance	In compliance	In compliance
Oregon City	In compliance	In compliance	In compliance	In compliance	In compliance
Portland	In compliance	In compliance	In compliance	In compliance	In compliance
Rivergrove	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034	Exempt until 12/31/2034
Sherwood	In compliance	In compliance	In compliance	In compliance	In compliance
Tigard	In compliance	In compliance	In compliance	In compliance	In compliance
Troutdale	In compliance	In compliance	In compliance	Exception	In compliance
Tualatin	In compliance	In compliance	In compliance	In compliance	In compliance
West Linn	In compliance	In compliance	In compliance	In compliance	In compliance
Wilsonville	In compliance	In compliance	In compliance	In compliance	In compliance
Wood Village	In compliance	In compliance	In compliance	In compliance	In compliance
Clackamas County	In compliance	In compliance	In compliance	In compliance	In compliance
Multnomah County	In compliance	In compliance	In compliance	In compliance	In compliance
Washington County	In compliance	In compliance	In compliance	In compliance	In compliance

APPENDIX D

Date: January 7, 2026
To: Metro Council and the Metro Policy Advisory Committee (MPAC)
From: Marissa Madrigal, Chief Operating Officer
Subject: Annual report on amendments to UGMFP Title 4 Map

Background

Title 4, *Industrial and Other Employment Areas*, of the Urban Growth Management Functional Plan (UGMFP) seeks to improve the region's economy by protecting a supply of sites for employment with requirements for local jurisdictions to limit the types and scale of certain non-industrial uses in designated Regionally Significant Industrial Areas, Industrial Areas, and Employment Areas. Designated areas are officially depicted on the UGMFP's "*Title 4 Industrial and Other Employment Areas Map*" (i.e., the "Title 4 Map").

The UGMFP requires that Metro's Chief Operating Officer (COO) submit a written report to the Metro Council and MPAC by January 31 of each year on the cumulative effects on employment land in the region of amendments to the Title 4 Map during the preceding calendar year. This memo constitutes the report on map amendments made in 2024.

Cumulative effects of Title 4 Map amendments in 2025

In December 2024, the Metro Council approved Ordinance No. 24-1520 to expand the urban growth boundary (UGB) to include the roughly 1,200-acre Sherwood West urban reserve. The ordinance also amended the Title 4 Map to apply an 'Industrial Area' designation to approximately 275 acres of the expansion area. When Ordinance No. 24-1520 became effective in 2025, the Title 4 Map was amended to include the additional Industrial Area in Sherwood West.

In January 2025, the Metro Council adopted Ordinance No. 25-1522. The ordinance amended the Title 4 Map in order to advance policies of Metro's Regional Framework Plan by removing approximately 59 acres of Title 4 designations from the Montgomery Park neighborhood of the City of Portland, consistent with the City's Montgomery Park Area Plan.

The 'Future Vision' update, currently in progress, will lead to an opportunity for Metro Council consideration of industrial land policy and regulatory changes, including changes to the Title 4 program and the Title 4 Map.