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MEMORANDUM

TO: Washington County CDC Assessment Technical Advisory Committee (TAC)

FROM: Jamin Kimmell, Lydia Ness, and Rachel Cotton, Cascadia Partners

DATE: October 22, 2025

SUBJECT: **TAC Meeting #2 Agenda and CDC Assessment Progress Report**

Thank you for agreeing to participate in the Technical Advisory Committee (TAC) for the Washington County Community Development Code (CDC) Assessment Project. The second of four TAC meetings will take place on October 29, 2025 from 3:30-5:00pm via Zoom.

The purpose of this memo is to introduce the agenda for TAC meeting #2, and to share a progress report on the CDC Assessment. The project team recommends that TAC members review these materials prior to the meeting.

TAC Meeting #2 Agenda

As a reminder, the role of the TAC is to provide input to staff and the consultant team on the substantive issues with the CDC and to review and provide feedback on consultant deliverables, including the Assessment Progress Report that is included below.

The purpose of TAC meeting #2 is to:

- Highlight key findings from the CDC assessment related to statutory compliance and streamlining and usability, and
- Obtain TAC feedback on some early concepts to address issues identified with the CDC.

The meeting agenda is as follows:

Agenda Item		Time
1	Introductions and Project Updates	10 minutes
2	Statutory Compliance	20 minutes
3	Streamlining and Usability	50 minutes
7	Public Comment Period	5 minutes
8	Next Steps and Project Timeline	5 minutes

CDC Assessment Progress Report

October 2025 (Preliminary Draft)



Prepared for Washington County by Cascadia Partners

Purpose of the CDC Assessment and Key Findings

Background and Overview

Cascadia Partners (CP) is conducting a detailed assessment of Washington County's [Community Development Code](#) (CDC) in the summer and fall of 2025 to identify where changes to the CDC structure and content are needed to:

- Comply with applicable state housing statutes;
- Reduce regulatory barriers to housing production and other development;
- Facilitate use of the CDC overall; and
- Ensure its consistency with federal, state, regional and local requirements.

The assessment will also flag:

- Inconsistent, outdated, and repetitive standards;
- Standards that are not clear and objective;
- Equity considerations and best practices, especially but not exclusively as they affect housing development.

The CDC's development regulations apply to all County unincorporated land, including urban unincorporated land inside the UGB and rural land outside the UGB. The assessment identifies opportunities to clarify and streamline regulations applying to both urban and rural areas of the County. The assessment also documents a series of known issues with interpreting and applying regulations that have been reported by staff. For land inside the UGB, the assessment will identify any barriers related to housing development.

To supplement the CDC assessment, CP conducted a series of interviews with local stakeholders for the purpose of identifying issues with using and administering the CDC, and with developing housing under the CDC standards.

This CDC Assessment Progress Report provides a concise summary of the findings from the code assessment and stakeholder interviews to date. It is organized into the following sections:

1. **Statutory Compliance Overview:** This portion of the report summarizes which portions of the CDC need amendments to comply with housing-related statutes and administrative rules, including legislation passed in the 2025 session. It also details areas of the CDC that may need updates to meet the requirement under ORS 197A.400 for clear and objective standards, conditions, and procedures when regulating the development of housing.
2. **Streamlining and Usability:** This portion of the report highlights opportunities for simplification, reorganization, consolidation, and reformatting of the CDC.

A future draft of the report will include an assessment of the CDC for potential barriers to housing and equity goals.

Summary of Key Findings

The CDC is a complex set of regulations that addresses both urban and rural development issues and responds to a wide variety of land use patterns and policy goals. The CDC assessment process includes a detailed review of every section of the CDC by the consultant team and staff. The review identified specific issues with certain sections or provisions, including outdated references, imprecise or undefined terms, internal conflicts, and other opportunities to improve clarity. The following summary documents key findings related to statutory compliance, streamlining, and usability issues in the CDC:

- **Statutory Compliance:** The CDC has been updated consistently in recent years to comply with housing-related legislation; as a result, the CDC complies with many housing-related statutes that were reviewed for as part of this assessment. However, the findings of the assessment indicate that a handful of targeted amendments are required to ensure ongoing consistency with statutory requirements. In addition, many CDC sections and specific provisions within sections may need to be amended to ensure compliance with requirements for clear and objective approval pathways for housing. Housing-related legislation passed in the 2025 session will also necessitate some additional amendments to the CDC.
- **Streamlining and Usability:** The CDC has a relatively simple hierarchical structure because it is primarily organized at two levels: articles and sections. While some users find the CDC fairly easy to navigate, given its simple structure and consistency over time, feedback from other users—including developers that are new to the County, new staff, and community members—indicates that some sections of the CDC can be difficult to use and understand. The CDC has been amended substantially over time, but never comprehensively reviewed for opportunities to enhance clarity, organization, and functionality, which contributes to additional usability issues. The following are the most significant issues and opportunities related to the usability of the CDC:
 - Inconsistent organization of sections across CDC articles;
 - Organization of permitted uses is complex and introduces repetition;
 - Density and dimensional standards are organized in lists, but may be easier to use in a table format;
 - Design and development standards may be redundant across sections and could be consolidated;
 - Application requirements and approval criteria are distributed throughout the CDC and could be centralized in one section;
 - Definitions are distributed throughout the CDC and could be centralized in one section;
 - Insufficient use of diagrams and inconsistent style conventions; and
 - Some procedures are unclear.

The final CDC Assessment Summary Report will include detailed tables that link these issues to specific CDC sections. There will also be an additional section of the report that details barriers to housing and equity goals.

Next Steps

This progress report contains content that will be used to create the draft CDC Assessment Summary Report. The draft Summary Report will include a more refined version of this content and a detailed inventory of issues related to specific CDC sections. It will also include an additional section covering barriers to housing and equity goals. That draft will be shared with the TAC for review at the next meeting. It will then be revised following additional rounds of review and feedback from staff, stakeholders, the Technical Advisory Committee, and the Planning Commission and used to create the final CDC Assessment Summary Report.

Following the issuance of the final report, the next phase of the CDC Assessment will be to formulate potential packages of code amendments, determine sequencing considerations, and apply a set of prioritization criteria to inform the timing of future code updates. This work will be documented in a CDC Priorities Report. Broader community engagement activities and public review will be conducted during that phase of the project.

Statutory Compliance Review and Recommendations

Housing-Related Statutes

A preliminary review for compliance with state statutes and administrative rules applicable to housing was conducted while reviewing the CDC for barriers to housing production and affordability. Table 1 lists the statutes reviewed and related bills, summarizes CDC compliance or non-compliance with the statute, and whether adoption into the CDC is necessary or recommended.

- In cases where the finding is that the CDC “partially complies” or “does not comply,” amendments will be needed to ensure consistency with the statute.
- Where the finding is “codification recommended,” the CDC does not include provisions that implement this statute but does not contain provisions that directly conflict with the statute. In such cases, codification is recommended for clarity and transparency to applicants/users of the code.
- Items marked as “HFO” indicate that the statutory requirement will be addressed by the County’s upcoming Housing Facilitation Ordinance.

Table 1. Statutes, Requirements, and Findings

State Statute	Related Bill(s)	Requirement	Finding	HFO
ORS 227.175	HB 2003 (2019)	Reduced Density or Height as Condition of Approval	Complies	
ORS 90.112	HB 2583 (2021)	Occupancy Limit Based on Familial Relationship	Complies	
ORS 197A.425	SB 1051 (2017)	Accessory Dwelling Units	Complies	X
ORS 197A.420	HB 2001 (2019) HB 2138 (2025)	Middle Housing	Complies ¹	X
ORS 92.031	HB 2001 (2019) HB 2138 (2025)	Middle Housing Land Divisions	Complies ¹	X
ORS 197.478	HB 4064 (2022)	Manufactured Homes	Partially complies	X
ORS 197.493	HB 2809 (2021) HB 2898 (2023)	Occupancy of Recreational Vehicles (RV)	Partially complies	
ORS 197.660 to 197.670		Residential Homes and Facilities	Partially complies	
ORS 197.480	HB 4064 (2022)	Manufactured Home Parks	Does not comply	
ORS 197A.430	HB 3395 (2023) HB 2138 (2025)	Single Room Occupancies (SRO)	Does not comply	X
ORS 92.835	HB 3245 (2003)	Manufactured Home Park Subdivisions	Codification recommended	X

¹ Complies with currently applicable statutes and administrative rules. Amendments will be necessary to comply with legislation passed in 2025 that take effect in the future.

State Statute	Related Bill(s)	Requirement	Finding	HFO
ORS 227.178	SB 1537 (2024)	Opting-In to Affordable Housing Regulations	Codification recommended	
ORS 197A.445	Amended 2021, 2022, 2023	Affordable Housing: General Siting Allowances	Codification recommended	
ORS 197A.460	HB 3395 (2023)	Affordable Housing: Redevelopment of Commercial Land	Codification recommended	X
ORS 197A.445	SB 8 (2021)	Affordable Housing: Density and Height Bonus	Codification recommended	X

Additional legislation passed in the 2025 session, including House Bill (HB) 2138 and Senate Bill (SB) 974, introduce a number of new requirements related to middle housing, middle housing land divisions, Single Room Occupancies (SROs), engineering review timelines, urban housing applications, design standards, and other requirements applicable to housing. The final version of the assessment report will contain a summary of requirements and timelines for compliance associated with these bills.

Clear and Objective Standards for Needed Housing

ORS 197A.400 requires local governments to adopt clear and objective standards, conditions, and procedures when regulating the development of housing, including needed housing, on land within an urban growth boundary. “Needed housing” is defined as housing by affordability level, type, characteristics and location that is necessary to accommodate the county’s allocated housing need over the 20-year planning period in effect when the county’s housing capacity is determined (ORS 197A.018). Further, the statute defines “needed housing” to include a wide variety of housing types. In effect, “needed housing” has been interpreted to include nearly all residential development.

Jurisdictions cannot discourage needed housing through unreasonable cost or delay. The “clear and objective” requirement pertains to development standards such as setbacks and building height that apply to housing at the time of building permit, and land use application criteria that apply to partitions, subdivisions, and development reviews.

Cascadia Partners and County staff conducted a thorough review of the CDC to identify all standards that apply to housing and determine if they are clear and objective. The following list identifies specific sections in the CDC that were identified as having some language that was not clear and objective and likely needing amendments to comply with ORS 197A.400. The project team is in the process of determining specific changes that will be needed to these sections to ensure that the identified standards are clear and objective, as well as the order of magnitude of needed changes. More information will be provided in the next draft of the report.

- **Article I: Introduction and General Provisions**

- Section 106 – Definitions
- **Article III: Land Use Districts**
 - Sections 302, 303, 304, 305, 306, 307, 308, 309, 311 – Various Districts
 - Section 313 - Community Business District
 - Section 373 - Historic and Cultural Resource Overlay District
 - Section 390 - North Bethany Subarea Overlay District
 - Section 391 - Bonny Slope West Subarea Overlay District
- **Article IV: Development Standards**
 - Section 401 – Introduction
 - Section 403 – Applicability
 - Section 404 - Master Planning
 - Section 406 - Building, Siting and Architectural Design
 - Section 407 - Landscape Design
 - Section 408 - Neighborhood Circulation
 - Section 410 - Grading and Drainage
 - Section 411 - Screening and Buffering
 - Section 413 - Parking and Loading
 - Section 416 - Utility Design
 - Section 423 - Environmental Performance Standards
 - Section 429 - Bicycle Parking
 - Section 430 - Special Use Standards
 - Section 431 - Transit Oriented Design Principles Standards and Guidelines
- **Article VI: Land Divisions And Property Line Adjustments**
 - Section 601 - Applicability
 - Section 602 - General Provisions for Standard Land Divisions and Property Line Adjustments
 - Section 605 - Standard Land Divisions and Property Line Adjustments Inside an Urban Growth Boundary

Streamlining and Usability

Overview

The CDC is a complex set of regulations that can be difficult to navigate and understand for some users, including developers that are new to the County, new staff, and community members. Streamlining and improving the usability of the code could have multiple benefits, including:

- Removing barriers to entry for developers that are new to the county, smaller developers, or less experienced development applicants;
- Reducing permitting delays that could result from developers not understanding the full scope of applicable standards or misinterpreting the CDC;
- Reducing staff time in explaining the code to development applicants;
- Shortening the timeline required for staff orientation and training to administer the CDC.

Addressing some of these issues may require significant reorganization of some CDC sections or restructuring of entire articles of the CDC. In some cases, implementing these improvements may also require making substantive or policy decisions about whether to remove, replace, or modify regulations that currently apply to certain uses or districts. Therefore, in the next phase of the CDC Assessment, these streamlining and usability improvements will be considered alongside other potential changes to the CDC to organize the changes into logical packages or phases.

Key Findings: Streamlining and Usability

A summary of the findings of the assessment related to streamlining and usability is presented below. Each finding is accompanied by preliminary concepts for how that issue could be addressed with a future CDC update. These findings and conceptual recommendations will be refined and added to as this assessment report is reviewed by stakeholders and staff.

Inconsistent organization of sections across CDC articles

Stakeholders interviewed for this assessment indicated that the overall organization of the CDC is sound and relatively easy to navigate. The CDC's organization into seven articles is intuitive to understand. The development codes of some other jurisdictions have a relatively complex organizational structure consisting of three or more hierarchical levels. In contrast, the County's CDC has a relatively simple hierarchical structure because it is primarily organized at two levels: articles and sections. As a result, the CDC's numbering

scheme is also relatively easy to navigate, with section numbers corresponding to the article the section is within.

Some sections of the CDC are very long and complex with many subsections, while other sections are very short. Examples of very short sections include:

- **Article I: Introduction and General Provisions** - Most Sections
- **Article IV: Development Standards**
 - Section 416 - Utility Design
 - Section 417 - Irrigation
 - Section 418 - Setbacks
 - Section 419 – Height

The very short sections contribute to the CDC having a large overall number of sections, requiring users to scan through many sections that may be used or referred to infrequently.

Examples of very long sections include Section 430 (Special Use Standards) within Article IV, Development Standards; and Section 501 (Public Facility and Service Requirements) within Article V, Public Facilities and Services. The long sections have relatively complex hierarchical structures with many subsections and embedded lists, which can be difficult to scan to identify relevant regulations.

Opportunities to improve the usability of the CDC include either grouping together multiple, short sections or dividing very long sections into separate sections. The goal of these changes would be to reduce the overall number of sections in the CDC, group related information together in the same section, and simplify the more complex structures of certain sections that are currently more difficult to navigate.

Organization of permitted uses is complex and introduces repetition

CDC Article III, Land Use Districts, contains a separate section for each of the County's 38 land use districts. The section for each land use district includes a list of permitted uses in that district and the associated review procedure required for each use. Some of these use categories are highly specific ("Bus Shelter", "Ambulance Service", or "Heliport"), which contributes to long and detailed lists. The overall result is a long list that is difficult to quickly scan and identify the applicable regulations for a specific use.

Because the list of permitted uses in each district is tied to the procedure type that applies to the use, the uses themselves are organized in terms of the complexity of the review procedure needed for approval, ordered from least to most complex review procedure. Uses listed under a Type I procedure can be approved administratively under clear and objective review criteria. Type II uses trigger public notice requirements and may require a determination from staff, including specific conditions of approval to minimize impacts and/or ensure compliance with the CDC. Type III uses entail a complex review that goes through a public hearing process. While this may be intuitive for staff, most CDC users are

not aware of the procedure type that applies to each use; the structure of the CDC requires users to scan multiple lists to determine if a use is permitted in a specific district.

Preliminary concepts to address these issues include:

- **Establish a system of use categories.** The land use districts' permitted uses include a mix of broad use types and very narrowly defined uses. Many, but not all, of these uses are defined in CDC Section 106 (Definitions) alongside other commonly used terms in the CDC. Many other jurisdictions' development codes group uses that are regulated similarly into broader categories. Those categories are then defined in a CDC section that is separate from the general definitions. That CDC section also may address the characteristics of the use category, examples of specific uses that fall into that category, and common accessory uses. These use category descriptions provide guidance on how to classify a use into a distinct category. A consistent system of use categories could make it easier and more efficient to determine the applicable regulations for any specific use. For an example of such a use category system, see the City of Hillsboro Community Development Code ([Subchapter 12.10](#)).
- **Organize use regulations into tables sorted by use category.** To make it easier to identify applicable regulations, the list of permitted use categories in each land use district could be organized into tables. The table would identify whether the use is permitted, the applicable procedure type for approval of the use, and cross-references to applicable standards for the use. Such tables would need to be supplemented with notes, footnotes, or cross-references in order to specify exceptions and limitations. However, a tabular format is easier and more efficient to scan and detailing the use-specific regulations in another section would help CDC users more easily find the standards that are applicable to a specific use. For an example of this format in the current CDC, see the Transit-Oriented Districts (Section 375, Table A).

Density and dimensional standards presented in cumbersome lists

Similar to the permitted uses, each CDC land use district section organizes density and dimensional standards in lists, making identification of the density and dimensional standards that apply to a specific use or housing type relatively difficult. Organizing these standards into a table, with cross-references to other sections for special exceptions or circumstances, could make these standards easier to identify and understand. For an example of this format in the current CDC, see the Transit-Oriented Districts (Section 375, Tables B(1)-C(2)).

Land use district requirements are repetitive across individual CDC sections

The CDC addresses each land use district in its own individual section. The advantage of this organization is that most of the regulations that apply to a given district are grouped

together in one place. A development proposal is typically located within one land use district. Giving each land use district its own section means that CDC users don't need to sift through regulations that apply in other land use districts.

The disadvantages of this approach are that:

- Regulations that are similar or identical across land use districts are repeated in multiple sections, resulting in a large number of individual sections and a lengthier CDC;
- Repetition of similar or identical regulations over multiple land use districts makes the CDC more difficult to maintain and update over time;
- Implementing updates to the CDC requires amending each individual district and ensuring that none are missed; and
- CDC users are not able to easily identify all land use districts in which a specific use would be allowed. A CDC user is required to review the permitted use list in each individual land use district section to obtain information about allowances.

Another issue is that some of the CDC's land use districts have very similar permitted uses, allowed densities and dimensional standards. The R-5 and R-6 districts are one example of two districts that have very similar permitted uses, allowed densities, and dimensional standards. Another example is the Transit-Oriented Districts and their corresponding base land use districts (for example, the R-9 District and the TO:R9-12 District).

In addition, the substantive differences between some of the lower density residential districts (R-5, R-6, R-9, and R-15) have been reduced as a result of implementing the state's Middle Housing requirements. Middle Housing types are required to be permitted at similar densities and subject to similar dimensional standards across these districts. Non-Middle Housing types still have more meaningful differences, however, in density and dimensional standards across these districts.

Opportunities to simplify and streamline the land use districts include:

- **Organize district sections into broader categories.** The current land use district regulations could be organized into broader categories without changing the underlying substantive requirements in each district. For example, the R-5 through R-9 districts could be organized into a "Low Density Residential Districts" section. That section would include tables and district-specific subsections to delineate the development standards that vary by district. Regulations that are identical across districts could be consolidated into one subsection or standard. This change could be implemented in a "policy-neutral" manner, meaning that the substantive requirements are not amended, but they are organized in an easier-to-use structure.

- **Reorganize the Transit-Oriented Districts as an overlay district.** The Transit-Oriented Districts allow for higher densities than the standard residential districts and have slightly different dimensional standards. Development in these districts is also required to meet additional design standards. These higher density allowances and additional design standards could potentially be applied through an overlay district, rather than separate base land use districts. The overlay district section would only address the standards that vary compared to the corresponding base district, as opposed to the current structure where an additional code section addresses the same set of standards as the base districts. Creating an overlay district would also reduce the number of land use districts in the CDC.
- **Consolidate districts that are substantively similar.** Going beyond a policy-neutral reorganization could include consolidating two or more districts into a single district. This would further simplify and streamline CDC Article III, in addition to organizing districts into broader section categories as described above. However, this type of consolidation would require policy changes, because it would require modifying substantive requirements that currently apply to properties in those districts, such as permitted uses, density standards, dimensional standards, or other district-specific design standards. This approach is more appropriate if the County wishes to address specific policy goals, such as removing barriers to housing development.

Design and development standards that may be redundant across CDC sections

In addition to the district-specific development standards in Article III, multiple CDC sections include design or development standards. These sections include but are not limited to:

- Section 392 - Pedestrian-Oriented Mixed-Use Districts
- Section 406 - Building Siting and Architectural Design
- Section 408 - Neighborhood Circulation
- Section 430 - Special Use Standards
- Section 431 - Transit-Oriented Design Principles, Standards, And Guidelines

Typically, these standards apply to different uses/housing types or to different locations. Generally speaking, the CDC is clear on where and how these standards apply, so they are not inconsistent or in conflict with each other. However, many of these sections include design and development standards that are substantively similar or identical. Rather than replicating a similar or identical standard in multiple sections, there may be opportunity to consolidate these standards into a smaller number of sections. Within those sections, the regulations could delineate the applicability of each standard to specific uses/housing types or locations. The substantive requirement could also continue to vary by use or location as needed while being organized within fewer sections.

Additionally, new state requirements associated with the Climate-Friendly and Equitable Communities program (CFEC) will require the County to apply some of these design and development standards to a broader geographic area in the future. The land use requirements of the transportation planning rule (OAR 660-012-0330) require the county to “implement plans and land use regulations to support compact, pedestrian-friendly, mixed-use land use development patterns in urban areas.” Some examples include standards for building orientation and frontage design related to setbacks and building entrances; building design standards to create an interesting and comfortable experience for pedestrians; and bicycle and pedestrian circulation standards related to connections to adjacent properties and walkway design. DLCD has published a [guidebook and model code](#) to assist jurisdictions in complying with this rule. The County must demonstrate compliance with this requirement at the time of adoption of the next Transportation System Plan (TSP).

Seeking compliance with these new CFEC requirements may lead the County to consider applying some of the design and development standards in the cited sections to a larger number of land use districts. If so, implementing this change concurrently with any changes to reorganize the design standards into fewer sections and remove unnecessarily redundant standards would make sense.

Additionally, SB 974, passed in the 2025 legislative session, prohibits a jurisdiction from applying certain residential design standards to residential developments inside UGBs with 20 or more units, except for multi-unit dwellings. Residential design standards are defined in the bill as those related to aesthetics, such as façade materials, roof form or materials, window elements, etc. If the County elects to consolidate/streamline design standards to improve usability, then it would be efficient to also modify or change the applicability of certain kinds of design standards that are impacted by SB 974 in order to comply with the statute. The barriers to housing and equity goals component of the assessment might also identify some design standards that could be considered for removal.

Development application requirements and approval criteria distributed throughout the CDC

The CDC does not have a specific section that addresses all the requirements and approval criteria associated with each type of development permit or application. These application-related provisions include application submittal requirements, review procedures, and approval criteria.

Rather than being grouped into one section, these provisions are currently distributed across many different sections of the CDC. For example, these provisions are located in:

- Section 203 - Processing Type I, II, and III Development Actions
- Section 403 - Applicability
- Section 406 - Master Planning

- Section 406 - Building Siting and Architectural Design
- Section 410 - Grading and Drainage
- Section 605 - Standard Land Divisions and Property Line Adjustments Inside an Urban Growth Boundary.

The scattered distribution of these provisions makes it difficult for development applicants to determine the full scope of submittal materials required for any specific permit or application, and the approval criteria that must be addressed.

Many other jurisdictions have a separate chapter or article of their development code that centralizes these requirements in one place. These centralized provisions usually address the review procedure for the application, thresholds for determining the applicable review procedure based on certain standards, submittal requirements, and approval criteria. For an example, see the City of Beaverton Development Code ([Chapter 40 – Applications](#)). Some jurisdictions have opted to remove submittal requirements from the development code and provide them via forms published by their planning departments. Adopting a similar structure may make the CDC easier to use and reduce potential for incomplete applications.

Definitions distributed throughout the CDC

Most of the terms used in the CDC that require a definition are located in Section 106 (Definitions). However, several other CDC sections include definitions for terms that are typically only used within that section. This approach can be useful when a term has a unique meaning in the context of a specific CDC section. However, this approach potentially requires users to search in multiple places to locate the applicable definition of a term. Further, users may mistakenly assume that the term is defined in CDC Section 106 and overlook another section-specific definition.

To address this issue, the County could review all the CDC's section-specific definitions and determine if they can be migrated and centralized into CDC Section 106. If terms have different meanings in different sections of the CDC, then that can be delineated in Section 106. As another streamlining measure, definitions could be ordered alphabetically and numbering could then be removed from Section 106. This would eliminate the need for renumbering when adding new definitions.

Insufficient use of diagrams and inconsistent style conventions

Diagrams and figures are critical for conveying the CDC's design and dimensional standards, especially those that are more complex. The CDC contains diagrams and figures intended to supplement and/or explain specific design and dimensional requirements that have been added piecemeal to the CDC over time. Many relatively complex CDC standards do not have associated diagrams, however.

Further, the existing CDC diagrams vary widely in their style conventions, such as shading or colors to denote various elements of a site (buildings, streets, sidewalks, etc.) and line styles (lot lines, setback lines, etc.). An approach to addressing this issue could include reviewing the CDC to identify standards that would be more easily and accurately understood with a diagram, adopting a consistent style convention for diagrams, and converting all existing diagrams to the adopted style convention.

Some procedures are unclear

Article II of the CDC details procedures for different application types. In some cases, the information pertaining to specific procedures, such as Appeals (Section 209), is complex and ambiguous. Ways to address this issue could include creating a table to clarify who makes decisions on different application types and appeals. Current Planning application forms may also offer suggestions for formatting the CDC to align with the approval and appeals process related to specific applications.