

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING)	RESOLUTION NO. 80-174
THE CITY OF JOHNSON CITY'S REQUEST)	
FOR ACKNOWLEDGMENT OF COMPLIANCE)	Introduced by the Regional
WITH THE LCDC GOALS)	Planning Committee

WHEREAS, Metro is the designated planning coordination body under ORS 197.765; and

WHEREAS, Under ORS 197.255 the Council is required to advise LCDC and local jurisdictions preparing comprehensive plans whether or not such plans are in conformity with the Statewide planning goals; and

WHEREAS, LCDC Goal #2 requires that local land use plans be consistent with regional plans; and

WHEREAS, Johnson City's comprehensive plan has been evaluated following the criteria and procedures contained in the "Metro Plan Review Manual" and in the June 20, 1980 Review Schedule, and is found to comply with LCDC Goals and to be consistent with regional plans adopted by CRAG or Metro prior to June, 1980, as summarized in the staff reports attached as Exhibit "A" and "B"; and

WHEREAS, The City of Johnson City is now requesting that LCDC acknowledge its comprehensive plan as complying with the Statewide planning goals; now, therefore,

BE IT RESOLVED,

1. That the Johnson City comprehensive plan is recommended for compliance acknowledgment by the LCDC.
2. That the Executive Officer forward copies of this Resolution and the staff reports attached hereto as Exhibit "A" and "B" to LCDC, the city of Johnson City and appropriate agencies.

3. That subsequent to the adoption by the Council of any goals and objectives or functional plans after June, 1980, the Council will again review Johnson City's plan for consistency with regional plans and notify the city of Johnson City of any changes that may be needed at that time.

ADOPTED by the Council of the Metropolitan Service District
this 28th day of August, 1980.



Presiding Officer

MB:bk
8711/33

A G E N D A M A N A G E M E N T S U M M A R Y

TO: Metro Council
 FROM: Regional Planning Committee
 SUBJECT: Recommendation on the City of Johnson City's Request for Acknowledgment of Compliance with LCDC Goals

I. RECOMMENDATIONS:

- A. **ACTION REQUESTED:** Adoption of the attached Resolution No. 80-174 that LCDC grant acknowledgment of the city of Johnson City's request for compliance. The Council should act on this item at its August 28 meeting in order to ensure that its recommendation is considered by DLCD (see background).
- B. **POLICY IMPACT:** This is the first Metro acknowledgment recommendation developed under the "Metro Plan Acknowledgment Review Schedule," June 20, 1980. This will help establish a basis for future acknowledgment review procedures and Metro Council action on compliance acknowledgment requests whereby interested parties are encouraged to participate in a work session to discuss plan acknowledgment issues prior to Regional Planning Committee action.
- C. **BUDGET IMPACT:** None

II. ANALYSIS:

- A. **BACKGROUND:** Johnson City submitted its plan to LCDC for acknowledgment in June, 1980. LCDC's hearing on the City's request for acknowledgment is scheduled for September 4-5, 1980.

Metro conducted a draft review of Johnson City's plan in October, 1979, and identified a number of deficiencies (see Exhibit "B"). Nearly all the deficiencies have been corrected through subsequent amendments to the plan.

Johnson City is unique in that all residents live in a mobile home park owned by Delbert Johnson. The City has decided to develop a more balanced community by providing for some commercial and industrial development.

Metro's acknowledgment review found that, although the Johnson City plan contains a limited set of policies, there are no major problems which would forestall implementation of the plan.

The Metro staff report and recommendation was prepared as per the "Metro Plan Acknowledgment Review Schedule,"

June 20, 1980. Under the previous Metro review procedures, the Regional Planning Committee (RPC) was provided with a complete Plan Acknowledgment Review report and staff recommendation for each jurisdiction seeking plan acknowledgment. Under the current June 20 schedule, the RPC was provided with an "Acknowledgment Issues Summary" report for each plan as developed through a "Plan Review Work Session," in which the jurisdiction and interested parties participated. The Summary identified all acknowledgment issues raised at the "Plan Review Work Session," areas of agreement, and the Metro staff position on areas where differences were not resolved, including the rationale for this position and the impacts of alternatives considered.

The Committee has received and acted upon the report and recommendations prepared by Metro staff, providing in the process further opportunity to hear comment from interested parties.

The role of the Council is to receive and act upon the RPC recommendation, based upon any additional testimony. In so doing, the Council should determine the Metro comment to the LCDC on those matters, if any, which remain the subject of differing opinion and discussion. The Council should either state the Metro policy on such subjects or request of the LCDC a clarification of State policy. And, the Council should determine whether and in what manner it wishes the subject to be pursued with the DLCD or before the LCDC.

- B. ALTERNATIVES CONSIDERED: Metro staff did not find any issues which warranted serious consideration of an alternative recommendation (i.e., for denial or a continuance).
- C. CONCLUSION: Metro's recommendation for approval will support local planning efforts while protecting regional interests.

MB:bk
8710/33

METRO PLAN ACKNOWLEDGMENT REVIEW SCHEDULE
June 20, 1980

Plan Review and Analysis (weeks 1-3)

- . On or about the first of each month, DLCD will be issuing "comment deadline/LCDC hearing date" notices for each plan submitted for acknowledgment. Normally, no more than two plans (within the Metro area) will be considered for review/acknowledgment within any one month with "continuance" reviews scheduled as received.
- . All affected agencies and interested parties are encouraged to conduct their initial review of submitted plans during this three week period. It is hoped that the product of this initial review would be a listing of acknowledgment issues for discussion at the subsequent work session.
- . Metro will conduct an acknowledgment review and develop a preliminary "plan acknowledgment issues list" for each plan to be used as a basis for discussion at the following "Plan Review Work Session."

Issue Identification and Recommendation Development (weeks 4-6)

- . Metro will hold a "Plan Review Work Session" to discuss submitted plans on the fourth Wednesday of each month. The purpose of this session is to identify the acknowledgment issues of each plan, record areas of agreement and clarify points of disagreement. Those expected to attend include Metro Councilors (especially those from the impacted area), Metro and DLCD lead plan reviewers, the respective local jurisdiction planner(s), other state agency and special interest group representatives and concerned citizens.
- . Based on the conclusions and agreements reached at the "Plan Review Work Session," each interested party is encouraged to develop and submit to the Metro Regional Planning Committee (RPC) written testimony and recommendations on plans submitted for acknowledgment.
- . Metro staff will develop a report for submittal to the RPC which, (a) lists all acknowledgment issues raised at the "Plan Review Work Session," (b) identifies areas of interpretation agreement, (c) presents the Metro staff position on areas when differences are not resolved, to include the rationale for this position and the impacts of alternatives considered.
- . At the regular scheduled meeting of the Metro Regional Planning Committee (normally held on the first Monday after the first Thursday of each month), the Committee will receive and act upon the report and recommendations prepared by Metro staff, providing in the process further opportunity to hear comment from interested parties.

- . Based on the RPC recommendation, Metro staff will prepare the final "Acknowledgment Review Report" for Metro Council consideration.
- . All participants in the affected agency work session will be mailed a copy of the Metro report prior to Council action.

Metro Council Action on Plan Acknowledgment Requests (week 8)

- . At the regular scheduled meeting of the Metro Council (held on the fourth Thursday of each month), the Council will receive and act upon the RPC recommendation, based upon any additional testimony. In so doing, the Council will determine the Metro comment to the LCDC on those matters which have been the subject of differing opinion and discussion. The Council will either state the Metro policy on such subjects or request of the LCDC a clarification of State policy. And, the Council will determine whether and in what manner it wishes the subject to be pursued with the DLCD or before the LCDC.

EXHIBIT A

JOHNSON CITY ACKNOWLEDGMENT REVIEW

Johnson City is located in Clackamas County just northeast of Gladstone. It is a small city consisting of only 42 acres with a population of 450 people. By the year 2000, the population is projected to reach 668.

The city is unique in that all residents live in a mobile home park and Delbert Johnson is the sole owner of all land within the City except eight acres owned by the city. Other lands within the City are zoned for commercial, industrial, multi-family and single family (mobile home) residential use.

The Johnson City plan sets out policy and land use designations for land within the city limits only and is, therefore, a "city limits" plan.

Metro's acknowledgment review report is in two parts: 1) a draft review of the City's plan and implementing ordinances prepared in October, 1979, and 2) a final plan review focusing on issues of regional significance.

Metro's draft review of Johnson City's plan identified several plan deficiencies under the State Goals. A copy of this draft review is incorporated herein. It is recommended that the DLCD focus its review on the adequacy of Johnson City's final submittal regarding the subjects of draft plan deficiency not covered in Part Two of our report.

Issues of regional significance were identified by 1) utilizing the Metro Plan Review Manual where regional issues (criteria) are italicized on the Plan Review Checklist Worksheets; and 2) an abbreviated version of Metro's December, 1979, document titled, "A Process for Defining the Regional Role in the Portland Metropolitan Area."

Metro recommends Johnson City's request for acknowledgment be approved.

General Requirements

All the general requirement items are included within the comprehensive plan package.

The following "opening language" is adequate for goal compliance:

"This plan and zoning ordinance shall be revised to conform to the goals and objectives and plans of the Metropolitan Service District or its successor on an annual basis and may be amended or revised more often than annually if deemed necessary by the city

council. Annual amendment and revision for compliance with the above regional goal, objectives, and plans shall be consistent with any schedule for re-opening of local plans approved by the Land Conservation and Development Commission." (Comprehensive Plan, p. 110)

As a plan update suggestion, the above "opening language" should be incorporated within the "Revision and Amendment Procedures" section of the plan.

Conclusion: The City satisfies all the "General Requirements."

Goal #1 Citizen Participation

The "Citizen Involvement Program" was approved by LCDC on April 23, 1976. The City's five member Planning Commission serves as the Committee for Citizen Involvement (CCI). Although Johnson City has not submitted its most recent Citizen Involvement Program Evaluation for review, Metro has not received any Goal #1 violation complaints.

Conclusion: The City complies with the regional requirements under Goal #1.

Goal #2 Land Use Planning

The Johnson City plan maintains a consistent format throughout. Each goal heading begins with a restatement of the Statewide Goal, the Johnson City policy, inventory, proposed action, alternatives and conclusion. The plan is implemented mainly through the Zoning and Subdivision Ordinances. Although policy development is limited, the City has no major problems which would preclude implementation of the plan. All Goals have been addressed in a balanced manner.

The "Land Use Map" and "Zoning Map" (p. 55) are one and the same.

An Urban Growth Management Agreement has been obtained from Clackamas County. In a letter to Mayor Glahn (March 7, 1978), it is stated that the County:

"...concurs with Johnson City's Planning Area/Urban Service Area. It is our understanding that the planning area coincides with the current city limits."
(Comprehensive Plan, p. 57)

Since Johnson City is a "city limits" only plan and does not anticipate future annexations to the City, the March 7 letter referenced above is adequate to meet the "Urban Growth Management Agreement" requirement.

Conclusion: The City complies with the regional requirements under Goal #2.

Goal #3 Agricultural Lands

Conclusion: Not applicable for cities within an adopted Urban Growth Boundary.

Goal #4 Forest Lands

The plan indicates there are no forested lands within the City's growth boundary (p. 28).

Conclusion: Not applicable.

Goal #5 Open Space, Scenic and Historic Areas and Natural Resources

The Department of Geology and Mineral Industries has not identified any aggregate resource sites within Johnson City. However, the plan inventory identifies a mineral aggregate deposit at the bottom of the City's five-acre Lake Leona. The aggregate resource is said to extend to a depth of 120 feet.

Johnson City intends to extract and sell the lake's aggregate resource with resulting revenues used to finance the lake-side park. The Johnson City Policy for Goal #5 is as follows:

"To protect and conserve our scenic resources and open space while taking the best advantage of our natural resources." (p. 29)

The "Urban Outdoors" study by CRAG, 1971 has no plans or policies which pertain directly to Johnson City.

Conclusion: The City complies with the regional requirements under Goal #5.

Goal #6 Air, Water and Land Resources Quality

The City concludes that the only air pollution sources are the automobile and backyard burning. The plan fails to mention that Johnson City is part of the Portland/Vancouver Interstate Air Quality Maintenance Area (AQMA) and thus part of a "non-attainment area" for meeting carbon monoxide, ozone and total suspended particulates requirements. The following plan language relates to the City's need to cooperate with the Department of Environmental Quality (DEQ) and Metro in regard to air, water and land quality (i.e., solid waste).

"By supporting and working with local, state, and regional agencies in charge of monitoring and controlling various types of pollution that can endanger our environmental quality, the city of Johnson City can insure its citizens of continued healthy environment." (p. 36)

Lake Leona is noted as being polluted due to siltation from storm run-off and underwater vegetation. The City intends to dredge the lake to improve its water quality.

Sewer service is provided by the Clackamas County Service District #1.

"Clackamas Garbage" is licensed to provide solid waste disposal service within the City. There is no mention of Metro's role in solid waste nor the City's willingness to cooperate with Metro on the planning for and siting of sanitary landfills. However, there are no Metro disposal site alternatives located in Johnson City.

Conclusion: The City complies with the regional requirements under Goal #6.

Goal #7 Lands Subject to Natural Hazards

The Johnson City plan indicates that most of the land is relatively flat with the northern edge approaching a 10 percent slope and, therefore, no slope hazards exist. Neither are there weak foundation soils, earthquake fault potentials or flooding within the City.

The Subdivision Ordinance requires major partition and subdivision applicants to submit a "Preliminary Environmental Assessment Statement." Upon review of this statement, the planning staff will determine whether or not there will be a significant impact as a result of development. If there will be a minimum impact, the applicant's request is forwarded to the Planning Commission for action. In the case where a significant impact is apparent, the applicant is required to submit a more detailed "Impact Statement." The specific requirements within the "Impact Statement" have not been delineated within the Ordinance. Metro finds that the "impact assessment" approach is adequate to ensure hazards are not created (e.g., increased storm run-off) by new development.

Conclusion: The City complies with the regional requirements under Goal #7.

Goal #8 Recreational Needs

There are no issues of regional significance identified under Goal #8 within Johnson City.

Conclusion: The City complies with the regional requirements under Goal #8.

Goal #9 Economy of the State

The City has opted to make a transition from almost exclusively a residential community to a mix of residential and business uses.

Clackamas County has raised concern (letter to Mayor LeRoy Glahn, March 7, 1979) over the extent of C-2 zoned land and the possible

impact to Root Road should that land develop commercially. The City has responded by amending its Plan/Zone Map in a manner that addresses, satisfactorily, the County's concerns regarding the potential impacts to Root Road.

Conclusion: The City complies with the regional requirements under Goal #9.

Goal #10 Housing

Utilizing plan maps contained within the Johnson City plan, the following land use calculations were made:

Existing Land Use

Residential	23 acres
Commercial	1 acre
Open Space (and lake)	6 acres
Vacant Residential	9 acres
<u>Vacant Industrial (after displacement)</u>	<u>3 acres</u>
Total	42 acres

As noted under Goal #7 of this review, there are no identified natural hazards in the City and, therefore, all vacant land is considered buildable.

The present population within the City is 405 housed in 204 residential units (all but one are mobile homes). The average household size is 2.2 persons per unit. The year 2000 population is projected to be 680.

The adopted "Land Use Map" calls for the relocation of approximately 80 existing mobile home units (on 9.3 acres) to make available lands along Root Road for commercial (C-2) and industrial (I-2) development. Vacant residential land (8.95 net buildable acres based on .05 acres for "planned" roads) will accommodate about 200 mobile homes (zoned MR-1, minimum lot size of 2000 square feet per unit). Hence, more than enough land has been allocated for residential units slated for relocation. Overall, the City will accommodate about 324 mobile home units at approximately 14 units per net acre (UNA).

Johnson City is a participant in the Areawide Housing Opportunity Plan (AHOP).

The City has adopted the following housing policy:

"To provide housing for the citizens of our City."
(p. 59)

The City's housing policy is implemented through the Zoning Ordinance which allows for two residential zone districts. The R-2 Urban High Density Single Family Residential District allows

outright single family houses to include mobile homes. The MR-1 Multi-family Residential District allows outright "Trailer Parks" (i.e., mobile homes) and multi-family dwellings. While both districts are included in the Ordinance, only the MR-1 District is designated on the Land Use/Zone Map (p. 55).

The Plan Map and Zone Map are one and the same and, thus, consistency between these maps is satisfied.

The State Housing Division has submitted an objection to LCDC regarding Johnson City's request for acknowledgment. Their objections center on Goal #10 Housing, which include:

1. Plan lacks an adequate buildable lands inventory; and
2. Plan lacks an adequate housing needs analysis by type, density and price range.

Metro and DLCD conclude that sufficient evidence has been presented in the Johnson City plan with which to judge compliance with Goal #10 and due to the unique circumstances within the City (e.g., limited buildable land, all residents live in mobile homes, etc.), acknowledgment of this plan would not set precedence for other jurisdictions seeking acknowledgment.

In summary, Johnson City has chosen to readjust its land use pattern to accommodate a more economically balanced tax base. The small size of the City, its unique residential character (i.e., all mobile homes) and the limited amount of vacant buildable land requires a low threshold for meeting Goal #10. The plan contains an adequate inventory, policy and implementing measures commensurate with the size of the planning effort.

Conclusion: The City complies with the regional requirements under Goal #10.

Goal #11 Public Facilities and Services

Except for the provision of water and storm drainage facilities, nearly all services are provided by service districts outside the City but within Clackamas County. Johnson City's water is pumped from two wells within the City and together with the 100,000 gallon storage tank, is adequate to serve a population of 2000.

Storm drainage is addressed through the "Storm Drain Map" (p. 96) and implemented through the Subdivision Ordinance.

Sewer, fire protection and police services are provided by the Clackamas County Service District #1, Fire District #71 and Sheriff's Department, respectively. There are no identified problems which would significantly affect the provision of these facilities and services now or in the future.

Plan policy is implemented through the City's Subdivision Ordinance.

Conclusion: The City complies with the regional requirements under Goal #11.

Goal #12 Transportation

The plan includes a classification system of the existing nine roadways. Tri-Met serves the City along Root Road. Pedestrians and bicycles utilize existing sidewalks and roadways. A proposed street plan for vacant land is provided. Most of the other modes of travel (i.e., air, highway and water travel) are not applicable to the City. The transportation plan is implemented through the Subdivision Ordinance.

Conclusion: The City complies with the regional requirements under Goal #12.

Goal #13 Energy Conservation

Although the City has not included the base data on Johnson City's energy use as presented in the "CRAG Region Energy Analysis," Report No. 2, 1972, the plan does briefly summarize the City's present energy conservation measures being employed.

Johnson City intends to promote energy conservation through the City's newsletter.

Conclusion: The City complies with the regional requirements of Goal #13.

Goal #14 Urbanization

All lands within the City are designated immediate urban and, therefore, the four conversion factors of Goal #14 are satisfied.

The City does not intend to annex any other land into the City.

The City limits are not located along Metro's UGB, and therefore, the City is not required to reference the UGB or Metro's role in amending the Boundary.

Conclusion: The City complies with the regional requirements of Goal #14.

MB:bk
8622/111

Metropolitan Service District

527 SW Hall Portland, Oregon 97201 503/221-1646

Memorandum

Date: October 31, 1979
To: Planning and Development Committee
From: Jill Hinckley
Subject: Johnson City Final Review

Johnson City is a small city northeast of Gladstone, 42 acres in area with a population of 450 people. All residents live in a mobile home park which along with the 20 remaining vacant acres in the City, is owned by Delbert Johnson.

The small size of the City, the small amount of vacant land it contains, and the unique ownership and development situation are special circumstances which must be considered when evaluating compliance. Because of these special circumstances, staff would like the Committee to review and approve the staff review at this stage so that the City can complete the remaining work needed with assurance that it will be adequate for a favorable Metro recommendation. The basic issues are as follows:

1. Displacement: The plan calls for about 1/3 of the City to be developed for local commercial and light industrial use. The area proposed for these uses abuts Roots Road and includes about half of the mobile home park and a small proportion of the City's vacant land. The remainder of the City is planned and zoned for residential use. Proposed zoning allows either mobile homes or apartments in this area.

Although this plan appears adequate to provide for some form of lower cost housing in ample amounts, it does not provide any protection for existing mobile homes. While staff regrets this situation, it does not believe it is a goal compliance issue, since the plan does allow for both mobile homes and other lower cost housing and, to a large extent, market demand for each use may properly be expected to guide the ultimate land use pattern.

2. Completeness: The City has completed most of the required inventories for most goals, but data and analysis on basic land use alternatives (economic development and housing) are virutally non-existent.

Similarly, policy statements in these areas are general and vague. Staff has requested some additional discussion

of economic alternatives in the plan's Economy Section, but generally believes that the type of analysis and policy normally expected of other jurisdictions is not needed in this case. A jurisdiction of Johnson City's size cannot be expected to meaningfully assess regional economic or housing needs, and it is difficult to determine what an appropriate assessment of local needs might consist of. Mobile homes will remain in that area of the City planned for non-residential development unless and until there is a real need for some form of economic development. Development of the vacant residential land can be expected to reflect housing needs in the area, since development opportunities are not constrained, as is so often the case in small cities, by zoning. Under the circumstances, staff finds that the minimal information provided is adequate for goal compliance.

3. Additional Work Needed: Although staff is satisfied with the general character and level of detail of the plan, several deficiencies have been identified which the City has been asked to remedy. The main requirements outstanding are as follows:

- (a) Soil suitability: Information and analysis and, as appropriate, policy on the impact of soils with poor drainage or high water table on storm drainage and hazard potential is needed.
- (b) Noise: Because of the potential for new commercial and industrial development in a currently residential area, staff finds that some provision should be made to protect City residents from possible noise impacts.
- (c) Economic analysis: The plan should include some further explanation of the type, location, and amount of economic development desired.
- (d) Implementation: The City needs a subdivision ordinance. In addition, the zoning ordinance needs to be revised to insure that land designated for residential use will be protected for that purpose.

A more detailed discussion of each requirement is attached.

The City is willing to undertake these corrections and if the Committee concurs with the staff review, the City expects to be able to submit for compliance acknowledgment by January 1, 1980.

JH:lz

Attachment

Johnson City: Final Review

General Requirements

0.1.3. If vacant land can be sold in parcels, the City must have a subdivision ordinance to govern parcelization.

0.1.7. Part of the City's submission to LCDC for compliance acknowledgment must identify the current CCI Chairperson. This can be done on a cover letter submitting the plan.

Goal #1: Citizen Involvement

1.6 The CCI should evaluate the plan at least annually. Since the Planning Commission is the CCI, the evaluation should be discussed and adopted at a public hearing. The easiest and most effective form for such an evaluation is to follow the six program requirements listed in Goal #1, explain what has been done to meet each, and evaluate whether or not this effort was adequate and how it could be improved in the future.

Goal #2: Land Use Planning

2.1.1. There are a number of inventory requirements for various goals which are not addressed in the plan. Where these requirements do not apply because these resources or hazards are not present in the City, a "disclaimer" should be included in the plan to this effect. Following is a list of those goal requirements for which such a disclaimer may be appropriate:

Goal #5: energy sources
wilderness areas
historic sites
cultural areas

Goal #7: ocean and stream flooding
earthquake hazard

Goal #8: history, archiology and natural science resources
scenic roads, travelways, sports, cultural events,
trails, hunting, winter sports
mineral resources

Goal #12: rail, air, water and pipeline transportation

2.1.2. Problems with consistency between the plan and the zoning ordinance are discussed under Goal #10 (Housing).

2.1.2.2. The open space area has not been placed in any zoning category. Any zone in which open space/recreational use is permitted would be an appropriate designation.

2.2.1. The letter submitting the plan for acknowledgment should

reference where plan documents are on file for public review.

2.2.2.1. Although the City is planning for its City limits only, LCDC staff advise us that it is desirable for the City to sign an agreement with the County which recognizes this fact. LCDC Field Representative Linda Macpherson will contact Clackamas County planning staff to try to arrange for them to prepare such an agreement for mutual approval.

Goal #5-7: Natural Resources; Air, Water, Land Resource Quality; Natural Hazards

5.1.7; 6.1.2.2 and 6.2.3.1; 7.1.3, 7.1.7, and 7.1.8. These criteria relate to the need to inventory areas with poor drainage and/or high water table and integrate this information into a plan which manages drainage in such a way as to protect wetlands, minimize water pollution from stormwater run-off and protect against hazardous development.

The plan does not contain inventory, analysis and policies adequate to address these criteria. The plan should identify those areas where poor drainage or high water table is a problem (using SCS ratings or other available data) and evaluate the impact of the problem. If the storm sewers adequately drain off storm run-off, then the main two issues which need to be addressed are: (1) the impact, if any, of new development on increased run-off at the point of discharge; and (2) any hazards to new development (basement flooding, etc.). Both could be dealt with either through adoption of a review procedure for all new development which would allow Clackamas County to evaluate the first, and the City's engineer to evaluate the second, or through presentation of adequate data and analysis in the plan to show that impacts would be minimal.

7.1.7 The soils in the City should also be evaluated for their SCS rating as "weak foundation soils." If this is not a characteristic, weak foundation soils should be included in the "disclaimer" statement (see discussion under Goal #2); if it is, it should be handled in the same manner as discussed above for soils with poor drainage or high water table.

6.1.4, 6.2.3.2, and 6.3.1.2 Because of the proposed transition from almost exclusively residential to a mix of residential and business uses, some provision should be made to protect City residents from excessive noise from new commercial, industrial development. This could be accomplished most easily by providing in the plan and zoning ordinance for a review procedure that would allow the Planning Commission to attach conditions to new commercial and industrial development to buffer against noise (e.g., through landscaping or berms) or otherwise mitigate its impact (e.g., limit hours of operation).

Goal #9: Economy

9.1 and 9.2 The plan includes very little in the way of a factual

base or analysis of alternatives. While a jurisdiction of Johnson City's small size and unique circumstances need not do a detailed economic analysis, a fuller explanation of the basis for the proposed commercial and industrial land use designation would be helpful. This explanation should include discussion of:

1. Types of uses desired: the zoning ordinance contains statements of "purpose" for the proposed commercial and industrial zones which could provide the basis for such a discussion;
2. Desired location for proposed uses: Commercial and industrial sites should be evaluated for their suitability for proposed uses. This discussion should include consideration of such factors as traffic access and drainage;
3. Desired amount of proposed uses: The City obviously cannot conduct a sophisticated market analysis, but data on the average mix of residential and business land uses in other communities is readily available (see attached from Oregon *of a 1980's* City's plan). In addition, a statement of the obvious -- that proposed commercial and industrial areas will not be developed for those uses unless and until there is a market demand for them -- might be helpful as a kind of "disclaimer."

Goal #10: Housing

10.2. Although the plan contains little in the way of a housing analysis, information currently in the plan on the total amount of vacant land designated residential constitutes an adequate "buildable lands inventory" provided that the additional work done on drainage is adequate to demonstrate that this land is all "buildable."

10.3.1. The main deficiencies with the housing section relate to the consistency and adequacy of the proposed zoning. To be consistent with the "residential" plan designation, the zoning ordinance should be amended to eliminate (or rename as "commercial") the MR-2 (Tourist) zone, which is not properly a residential zone. In addition, the provision for "Transitional Uses" should be revised in all three residential zones to specify the area in terms of distance from other zones (e.g., 100'), since the current definition would allow the entire residential area to be developed commercially. (To the extent this "transition area" provides a buffer between residential and non-residential uses, it might be more appropriately applied in the non-residential zones.)

Finally, to provide adequate plan implementation, the MR-1 zone should specify a maximum density (i.e., minimum required square feet of land area per unit). To be consistent with the housing section, minimum square footage required per unit should probably not exceed 5,000 square feet. If requirements are substantially less than 2,500 square feet, or so, there should be information on soils suitability adequate to demonstrate that the land can support such density.

JH:bk

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METRO PLAN ACKNOWLEDGMENT REVIEW SCHEDULE
June 20, 1980

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- . On the first of each month, DLCD will be issuing "comment deadline/LCDC hearing date" notices for each plan submitted for acknowledgment. No more than two plans (within the Metro area) will be considered for review/acknowledgment within any one month.
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- . At the regular scheduled meeting of the Metro Regional Planning Committee (normally held on the first Monday after the first Thursday of each month), the Committee will receive and act upon the report and recommendations prepared by Metro staff, providing in the process further opportunity to hear comment from interested parties.

- . Based on the RPC recommendation, Metro staff will prepare the final "Acknowledgment Review Report" for Metro Council consideration.
- . All participants in the affected agency work session will be mailed a copy of the Metro report prior to Council action.

Metro Council Action on Plan Acknowledgment Requests (week 8)

- . At the regular scheduled meeting of the Metro Council (held on the fourth Thursday of each month), the Council will receive and act upon the RPC recommendation, based upon any additional testimony. In so doing, the Council will determine the Metro comment to the LCDC on those matters which have been the subject of differing opinion and discussion. The Council will either state the Metro policy on such subjects or request of the LCDC a clarification of State policy. And, the Council will determine whether and in what manner it wishes the subject to be pursued with the DLCD or before the LCDC.

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