

BEFORE THE COUNCIL OF THE  
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING A )	RESOLUTION NO. 80-180
CONTINUANCE OF THE CITY OF )	
WOOD VILLAGE'S REQUEST FOR )	Introduced by the Regional
ACKNOWLEDGMENT OF COMPLIANCE WITH )	Planning Committee
THE LCDC GOALS )	

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, The city of Wood Village is now requesting that LCDC acknowledge its Comprehensive Plan as complying with the Statewide Planning Goals; and

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

WHEREAS, Wood Village's Comprehensive Plan has been evaluated for compliance with LCDC goals and regional plans adopted by CRAG or Metro prior to June, 1980, in accordance with the criteria and procedures contained in the "Metro Plan Review Manual" as summarized in the staff reports attached as Exhibit "A" and "B"; and

WHEREAS, Metro finds that Wood Village's Comprehensive Plan does not comply with the LCDC Goals #2, #7 and #10; now, therefore,

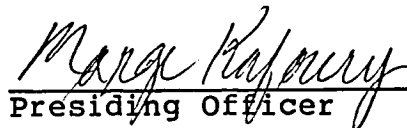
BE IT RESOLVED,

1. That the Metro Council recommends to LCDC that Wood Village's request for compliance acknowledgment be continued to correct deficiencies under Goals #2, #7 and #10, as identified in Exhibit "A."

2. That the Executive Officer forward copies of this Resolution and Staff Report attached hereto as Exhibits "A" and "B" to LCDC, city of Wood Village and to the appropriate agencies.

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

ADOPTED by the Council of the Metropolitan Service District  
this 25th day of September, 1980.

  
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Presiding Officer

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A G E N D A M A N A G E M E N T S U M M A R Y  
APPROVED BY THE METRO COUNCIL

THIS 25<sup>th</sup> DAY OF September 1980

TO: Metro Council  
FROM: Executive Officer  
SUBJECT: Recommending a Continuance of the City of Wood Village's Request for Acknowledgment of Compliance with the LCDC Goals

*Cynthia M. Wickham*  
CLERK OF THE COUNCIL

I. RECOMMENDATIONS:

- A. ACTION REQUESTED: Adoption of the attached Resolution No. 80-180 recommending that LCDC grant a continuance of the city of Wood Village's request for compliance. The Council should act on this item at its September 25 meeting in order to ensure that its recommendation is considered by DLCD (see background).
- B. POLICY IMPACT: This Metro acknowledgment recommendation was 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: Wood Village submitted its plan to LCDC for acknowledgment in June, 1980. LCDC's hearing on the City's request for acknowledgment is scheduled for October 30-31, 1980.

Metro conducted a final review of Wood Village's plan in December, 1979, and identified a number of deficiencies (see Exhibit "B"). Most of the deficiencies have been corrected through subsequent amendments to the plan.

Wood Village is a relatively small city with a population of about 2,400 people. The City is largely developed with only 49 acres of vacant residential land, the majority of which is committed. It is bordered by Fairview on the west and Troutdale on the east and, therefore, has limited capabilities for expanding its City limits.

Most of the deficiencies identified in Metro's Acknowledgment Review of Wood Village's plan can be corrected with a minimum amount of work.

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 the Wood Village 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 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 Council will receive and act upon the RPC recommendation, receive any additional testimony and adopt a final recommendation on acknowledgment requests for compliance with Statewide Planning Goals. 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).
- C. CONCLUSION: Metro's recommendation for a continuance will support local planning efforts while protecting regional interests.

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WOOD VILLAGE ACKNOWLEDGMENT REVIEW

INTRODUCTION

Wood Village is located in the eastern urban area of Multnomah County between the cities of Fairview and Troutdale. Wood Village was incorporated in 1951. The City is expected to grow to a population of 3,000 to 3,500 people by the year 2000. There are only 49 vacant buildable residential acres within the city limits.

The Wood Village plan sets out policy and land use designations for land within the city limits and is submitted as a "complementary" plan.

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

Metro's Final Review of Wood Village's plan identified several plan deficiencies under the Statewide Goals. A copy of this final review is incorporated herein. It is recommended that the DLCD focus its review on the adequacy of Wood Village's final submittal regarding the subjects of draft plan deficiencies 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 Wood Village's request for acknowledgment be continued to correct deficiencies of regional concern identified under Goals #2, #7 and #10.

General Requirements

All general requirements have been satisfied. The following "opening language" is minimally adequate for compliance with regional requirements. The plan and subdivision ordinance, however, lack a process for amendment. This deficiency is discussed under Goal #2 of this review.

"Regional or statewide planning agencies may on occasion find it necessary to require changes in local comprehensive plans so as to adjust for the cumulative effect once these plans become

acknowledged. Wood Village will cooperate with the appropriate agencies in reviewing any requested changes to its plan as the need arises." (p. 4)

Wood Village's 1978 population was 2,410. The City projects an ultimate population of approximately 3,000 to 3,500 people by the year 2000, which is generally consistent with Metro's "208" projection.

Conclusion: The City satisfies the general requirements.

#### Goal #1 Citizen Involvement

The Planning Commission serves as the Committee for Citizen Involvement. The Citizen Involvement Program was approved in June, 1976. The City concludes that although only a limited number of citizens have been involved in the planning process, ample opportunity for involvement has been provided.

No Goal #1 violation complaints have been received by Metro regarding the City's Citizen Involvement Program.

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

#### Goal #2 Land Use Planning

The plan is organized on a goal-by-goal format. Each subject area contains a goal, policies and a background discussion section. As noted under the "General Requirements" of this review, the Wood Village Comprehensive Plan and Subdivision Ordinance do not contain a provision whereby amendments can be made. The Zoning Ordinance (No. 8-1972) may be amended as per Section 8.30.

Goal #2 requires that a process be established by which the plan and implementing measures may be reviewed and, as needed, revised on a periodic cycle. The Wood Village plan lacks this provision.

As submitted to LCDC and Metro, the Wood Village Comprehensive Plan package included Zoning Ordinance No. 1-1980. Subsequent to this submittal, the City indicated that Ordinance No. 1-1980 was not adopted and, therefore, requested that the old Zoning Ordinance (No. 8-1972) be reviewed for compliance. Therefore, Metro's review is based on Ordinance No. 8-1972.

Included within the text of the plan was a "Proposed Land Use" map, an "Existing Zoning" map and a "Proposed Zoning" map. The Land Use map and Existing Zoning map have been adopted (conversation with the City's planning consultant, Dean Apostol of Carter, Bringle & Assoc.). Therefore, Metro's review is limited to the adopted maps only.

A comparison between the Land Use Map and Zoning Map reveals that one parcel along the south side of Halsey Street needs to be down zoned. The parcel(s) is presently zoned C-2, whereas, the plan designates the parcel for medium-high density residential (i.e., Baker type conflict exists). However, since the subject parcel(s) are fully developed for residential use, this issue is moot at this point in time.

An Urban Planning Area Agreement (UPAA) has been signed with Multnomah County with the County's plan controlling land use within the unincorporated portions of the County/City Urban Planning Area.

Conclusion: The City does not comply with the regional requirements under Goal #2 . In order to comply, the City must:

1. Amend the plan and Land Division Chapter to provide for an amendment process.
2. Amend the plan to provide for a periodic review and update of the plan and implementing ordinances.

#### Goal #3 Agricultural Land

Conclusion: Not applicable for lands located within an adopted Urban Growth Boundary (UGB).

#### Goal #4 Forest Lands

Metro's "Final Review" of the City's plan indicated the City complies with all Goal #4 requirements.

Conclusion: The City complies with the regional requirements under Goal #4.

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

The plan states (p. 18) that there are no identified mineral or aggregate resources within Wood Village. This finding is consistent with the "Oregon Department of Geology and Mineral Industries" (ODGMI), 1978 report.

"The Urban Outdoors" study by CRAG, 1971, has no plans which impact Wood Village directly.

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

#### Goal #6 Air, Water and Land Resources Quality

The Arata Creek and a tributary to Fairview Creek pass through Wood Village. There are no identified water quality problems within Arata Creek. Water quality in Fairview Creek is largely the responsibility of Gresham.

The City's sewage is treated at the Gresham Sewage Treatment Plant and, therefore, water quality is the responsibility of Gresham. The Wood Village plan does have policy calling for the protection and enhancement of vegetation to protect stormwater quality and the review of industrial development proposals to minimize their adverse environmental impacts. The vegetation policies are implemented through Section 3.922.5 (amendment to Ordinance No. 8-1972) of the Zoning Ordinance, applicable only to the A-2 (Apartment Residential) District. Policy calling for the review of industrial developments is not carried-out in the implementing ordinances.

Although the plan contains no inventory on air quality, it does include Metro's "sample language" which is minimally acceptable for goal compliance.

"Wood Village lies within the Portland-Vancouver Interstate Air Quality Maintenance Area (AQMA). This area is described in the draft State Implementation Plan (SIP) for air quality, published jointly by the Department of Environmental Quality and the Metropolitan Service District in April, 1979. The draft SIP shows that the entire AQMA is in nonattainment for meeting the recently revised federal ambient air quality standards for ozone and is predicted to remain in nonattainment to at least 1987 unless additional control measures are undertaken. MSD and DEQ are developing a regional control strategy to bring the metropolitan area into attainment by 1987. Wood Village will cooperate and work with these agencies to realize this goal.

"Until such time as control strategies are realized, Wood Village will use measures described in the DEQ handbook for "Environmental Quality Elements of Oregon Local Comprehensive Land Use Plans" when planning any development activities having the potential to directly (by direct emissions) or indirectly (by increasing vehicular travel) affect air quality." (p. 15)

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

#### Goal #7 Areas Subject to Natural Hazards

Arata Creek and a tributary to Fairview (crossing only a small portion of the City) are subject to periodic flooding. A storm drainage plan for Arata Creek has been developed and implemented with positive results. A master drainage plan has been completed for the tributary to Fairview Creek but due to a lack of funds, has not been implemented. The flooding problems extend beyond the Wood Village city limits and, therefore, the City is limited in the steps it can take to ameliorate the situation. The city of Gresham has prepared a drainage study for the entire Fairview Creek Drainage Basin.



There are a limited number of hazardous slopes in the City. Soils subject to high water table and/or poor drainage are scattered throughout the City.

The following plan policies have been adopted to address natural hazards in Wood Village:

"Continuation of efforts to alleviate flooding problems encountered near Fairview Creek, either through an independent action by the City of Wood Village or through cooperation with other local jurisdictions.

"Close monitoring of building techniques on soils of low bearing strength and steep slopes through the offices of the city engineer and building inspector.

"Cooperation with state and regional authorities on area disaster plans." (p. 17)

There are no provisions within the City's implementing measures by which to carry-out the above policies.

Conclusion: The City does not comply with the regional requirements under Goal #7. In order to comply, the City must:

- . Adopt implementing measures adequate to ensure protection from natural hazards (e.g., adopt a floodplain ordinance, adopt Chapter 70 of the Uniform Building Code, etc.).

#### Goal #8 Recreational Needs

The plan presents a brief analysis of recreational opportunities in the Wood Village area. Policy calls for a variety of recreational facilities. Section 31 (Land for Public Purposes) of the "Land Division Chapter" provides the Planning Commission with the option to require portions of subdivisions to be reserved for public acquisition for a period not to exceed one year. In addition, all subdividers are required to dedicate not less than six percent of the gross area within a subdivision as park land. If the Planning Commission determines that there is no suitable land within the subdivision for recreational use, then a fee of equal value is charged. Park land dedication for recreational use is also required in PUDs and apartment developments in the A-2 district.

As noted under Goal #5, there are no plans contained within the "Urban Outdoors" study, that directly impacts Wood Village.

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

## Goal #9 Economy of the State

The plan includes a good discussion of the various alternatives available to the City to improve its economic base. Of the 36 acres zoned for commercial development and 49 acres zoned for industrial uses, about nine acres of commercially zoned land and 15 acres of industrially zoned land remain vacant and buildable (conversation with Dean Apostol, 9-8-80). Plan policies are implemented mainly through the Land Use Plan and Zoning Ordinance. As noted on page 15 of the plan:

"Until such time as control strategies are realized, Wood Village will use measures described in the DEQ Handbook for "Environmental Quality Elements of Oregon Local Comprehensive Land Use Plans" when planning any development activities having the potential to directly (by direct emissions) or indirectly (by increasing vehicular travel) affect air quality."

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

## Goal #10 Housing

It is stated within the Wood Village plan that a housing needs analysis can only be accomplished at a regional level and, therefore, the existing/new unit potential "Housing Matrix (Figure 1, p. 25) constitutes as the City's needs analysis. In addition, the City's regional housing needs are defined in part, through the Metro "UGB Findings," (i.e., guidelines for single family/multi-family split and housing densities), a portion of the December 10, 1979, LCDC report on acknowledging Metro's UGB (pp. 12-14), and the year 2000 population projections (i.e., Metro "208" population projections). However, Wood Village is not a participant in the Areawide Housing Opportunity Plan (AHOP) and, therefore, must conduct a more extensive analysis than presented in the plan.

In the Metro region the AHOP has been developed as a regional assessment of assisted housing needs and a "fair-share" distribution of assisted units. Since Wood Village has declined to participate in the AHOP, the City's plan must include a regional housing analysis that identifies Wood Village's role in providing for its assisted housing needs. At a minimum, the City must identify the existing and three-year (1980-83) need for assisted housing and how Wood Village will meet that need.

Note: Low-income households are defined as all households whose incomes are below 80 percent of the regional median income. In order to determine which low-income households are in need of assistance, the following criteria is applied:

1. Households paying above 25 percent of their income for housing;

2. Households having more than one person per room (i.e., overcrowded); or
3. Households residing in a substandard dwelling unit.

Although the City has identified a number of areas which are subject to natural hazards, the analysis which depicts the acres of land allocated for new residential development does not distinguish between buildable and constrained lands. The City's planning consultant, Dean Apostol, has subsequently identified about one acre of land (in the single family zone) which is subject to hazards (i.e., steep slopes). Therefore, Metro concludes that all but one acre of vacant land is considered buildable. This is sufficient to constitute as the City's buildable lands inventory.

As presented below, the plan calls for a 51/49 single family/multi-family new construction ratio with over half of the single family units being mobile homes. The overall density is approximately 8.7 units per net acre (UNA). This is a commendable ratio and density given the City has only 49 acres of vacant residential land remaining.

SINGLE FAMILY/MULT-FAMILY RATIO

	<u>Existing Units</u>	<u>Planned New Construction</u>	<u>Build-Out</u>
SF	520 (57%)	168 (51%)	688 (55%)
MF	392 (43%)	160 (49%)	552 (45%)
TOTAL	912 (100%)	328 (100%)	1,240 (100%)

The Zoning Ordinance (No. 1-1972) establishes four single family districts (R-12, R-10 and R-7.5) and two multi-family districts (R-4 and A-2). Upon close examination one finds inadequate provisions for the siting of mobile homes (Trailer parks are allowed in the A-2 and C-2 district). The projected 88 mobile homes (within one mobile home park in the C-2 zone), however, are presently under construction and therefore this issue is moot.

Zoning Ordinance No. 8-1972 does include a Planned Development District - PD (Section 6.40), but approval is subject to the following vague and discretionary standards:

"The Planning Commission shall informally review the Preliminary Development Plan and Program at a regular meeting and may act to grant preliminary approval, approval with recommended modifications or denial. Such actions shall be based upon the Comprehensive Plan, the standards of this ordinance and other regulations and the suitability of the proposed development in relation of the character of the area."  
 (Emphasis added) (Section 6.4201 - c)

Since the City more than meets its regional housing obligations, the P.D. provision (even though permitted under vague standards) is superfluous to compliance with Goal #10.

Duplexes are permitted in the single family district on lots where the side abuts a commercial or industrial district. This provision could add more multi-family units to the City's overall housing mix (i.e., SF/MF) ratio. However, also permitted are "transitional uses" such as medical offices and parking lots. With such flexibility, we seriously question whether residential units will be built at all on vacant lots which abut a commercial or industrial district. Within the apartment district (A-2), hotels and motels are permitted subject to a public hearing. The City has indicated that there is approximately 1.8 acres of land (i.e., two parcels with .9 acres each) in the A-2 zone which could be impacted by the option to build a hotel or motel (conversation with Dean Apostol, 9/9/80). According to the density allowed under Section 3.921 of the Zoning Ordinance, this could result in the loss of 30 projected multi-family housing units. This is quite significant in terms of the overall number of potential new multi-family units.

Finally, as noted under Goal #8 of this review, developers of new subdivisions must dedicate six percent of the gross area for recreational uses or pay a comparable fee (Section 31.02). Development in the A-2 zone requires a minimum of 200 sq. ft. of recreational area for each multi-family unit for projects of 15 through 30 units and 300 sq. ft. for each unit for projects of 31 or more units (Z.O. Section 39.225). This latter standard also applies to Planned Unit Developments (Z.O., Section 6.4305-G). Metro finds the 6 percent park land dedication/fee and A-2 open space/recreational area requirements are reasonable and justified.

Conclusion: The City does not comply with the regional requirements under Goal #10. In order to comply, the City must:

1. Develop an assisted housing needs analysis and adopt appropriate policies and implementing measures sufficient to meet the need, or become a participant in the AHOP.
2. Demonstrate that the option to place medical offices and parking lots (on lots where the side of a lot abuts a commercial or industrial district) in the single family districts and hotels and motels in the multi-family district (A-2) will not jeopardize the City's ability to meet its housing needs or delete these options from the Zoning Ordinance.

#### Goal #11 Public Facilities and Services

The City's water source is the Troutdale aquifer, drawn through two City operated wells. The three reservoirs have a storage capacity of 1.45 million gallons. The water is of good quality and the City's distribution system is adequate to meet future needs.

Wood Village's sewage is treated at the Gresham Sewage Treatment Plant. The Gresham plant is noted as being over capacity, but plant expansion is underway. Another expansion of the Gresham facility will be needed to meet future demands.

The plan policy quoted below is adequate to ensure consistency with the "208" Waste Treatment Plan:

"Wood Village will cooperate with other area jurisdictions to improve public facilities as the need arises, including solid waste disposal, sanitary sewage treatment and energy transmission facilities." (p. 29)

Storm drainage has been addressed, for the most part, through the "Natural Hazards" section of the plan (see Goal #7 of this review) and the "Storm Sewer" plan map.

Although the plan notes the existence of a systems development charge (p. 27), this is simply a hook-up fee (reference - Metro's Final Review of the Wood Village Plan, p. 3).

The plan contains the following "solid waste language," adequate to meet regional concerns:

"Wood Village recognizes MSD's responsibility to prepare a solid waste management plan, and will cooperate with regional planning efforts to handle solid waste disposal and recovery." (p. 28)

Paragraph two on page 28 states: "...all new development must be approved by the Wood Village Planning Commission...." Since most uses are permitted outright, we find this statement inappropriate and hence, recommend this statement be deleted either during the "continuance" period or the first update of the plan.

Plan policies are implemented mainly through the Zoning Ordinance and Land Division Chapter.

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

#### Goal #12 Transportation

The plan includes a brief discussion of the traffic congestion problems along the City's arterial streets and planned improvements to relieve the congestion. A roadway classification system is presented in the plan (p. 32A).

The eastside light rail transit project is mentioned. In order for Wood Village residents to take advantage of this system, bus service from Wood Village to Gresham is needed. In general, Tri-Met serves the City on an east/west axis. The plan identifies the need for a north/south bus routing system as well.

Transportation policy calls for the cooperation with regional and county governments to improve the transportation systems in Wood Village. Although there is no discussion or policy on the transportation disadvantaged, this issue is adequately addressed on a regional level through the Regional Transportation Plan (RTP) and present efforts by Tri-Met.

The plan is implemented primarily through the Land Division Chapter and the Zoning Ordinance.

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

#### Goal #13 Energy Conservation

A brief discussion of the City's options to help conserve energy is presented. Although the energy use data contained within the "CRAG Region Energy Analysis" report, 1977, is not included, the plan does identify the total electrical energy used by Wood Village for 1975.

The energy conservation policies establish a basis upon which the City can proceed to encourage energy conservation:

"The city hall will establish a car pooling center to assist residents in forming car pools.

"City officials will organize a petition effort in cooperation with Fairview, Gresham and Troutdale to inform Tri-Met officials of the need for local transit service.

"The Wood Village Planning Commission will encourage development of a local retail center on the north side of Halsey in cooperation with Fairview.

"The City zoning ordinance will be revised to encourage energy-saving techniques in site development and construction." (pp. 35-36)

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

#### Goal #14 Urbanization

Since the City is substantially developed and has a "city limits" plan, the four conversion factors of Goal #14 are satisfied.

The city limits are not coterminous with the Metro UGB and, therefore, the City is not required to identify the UGB on the City's plan map or recognize within the plan, Metro's role in the amendment of the boundary.

Policy calls for the encouragement of infill on vacant land, working cooperatively with affected government bodies responsible for the determination of future city boundaries and the extension of urban services in an orderly fashion.

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

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## WOOD VILLAGE FINAL REVIEW

Numbers in the following discussion refer to items in the Metro/DLCD plan review check list.

I. Regional Concerns:

Opening language (0.1.9): We urge inclusion of the "sample language" we have provided (Attachment A), but would accept any addition to the language in the second paragraph on p. 4 which makes it clear that: (1) plan amendments may be necessary to comply with regional goals, objectives, and functional plans adopted by Metro in the future; and (2) Metro may initiate a request for plan amendments of this type.

Coordination with Regional Air and Water Quality Plans: We urge inclusion of the "sample language" in coordination with the State Implementation Plan (SIP) and the "208" Plan (Attachment B). The first paragraph of the sample SIP language, containing basic information on regionwide air quality problems, provides an important supplement to the air quality discussion currently in the plan.

Our paramount concern, however, is recognition of the need to coordinate local and regional planning policies in these areas. Reference to regional as well as county, state and federal officials in the policy on p. 14 would provide the minimum necessary to address our concerns. We hope the City will consider including more detailed data and policy, consistent with our "sample language," when it next undertakes to revise and update its plan.

Housing: The plan does not address most of the Goal #10 (Housing) criteria in the plan review worksheets. Most notable is the absence of any data, analysis, or policy on housing needs relative to income. Metro does have a strong regional interest in the provision of housing at the local level adequate to meet regional needs. Based on our discussion, I do not believe that plan deficiencies jeopardize regional housing interests or needs because: (1) Wood Village has provided, on its plan map and through zoning, for new housing construction well in excess of that assumed needed in Metro's UGB Findings; and (2) you indicated that there are only about 10 acres of uncommitted vacant residential land within City limits. Documentation of the fact that all but ten acres are currently committed is needed, however.

You should be aware that LCDC may differ in its judgment on this matter and expect more complete data, analysis, and policy.

Service Provision: Metro has expressed its interest in helping the East County cities resolve current questions about who should annex and serve which areas. We do not believe, however, that the current uncertainty is a goal compliance issue.



## II. LCDC Goal Compliance Issues:

There are a number of criteria on the plan review worksheets that have not been adequately addressed. Neither we nor LCDC expect "perfect" plans which meet all criteria, however. Following is our judgment on which "deficiencies" may be judged by LCDC to be sufficiently serious to preclude acknowledgment. I want to emphasize, however, that we cannot guarantee either that the following problems are the only possible compliance issues, nor that all of them will be found to jeopardize compliance acknowledgment. Finally, while it is relatively easy to describe the most the City would have to do in order to remedy the identified problems, it is neither possible nor desirable for us to advise the City on the least it can "get away with" and still be acknowledged. Where I have suggested additional work which might be done to address an identified problem, it is an indication only of what would be necessary to satisfy Metro that the goal requirement has been met.

### Goal #2: Land Use Planning:

The plan does not appear to contain a schedule for periodic review and revision of the plan (2.2.3). This is a clear goal requirement and one which is likely to be viewed as essential for acknowledgment. As an alternative to adding such a schedule to the plan itself, it could be provided in the ordinance adopting the plan or in a separate resolution or ordinance.

The zoning and subdivision ordinances should be revised to implement the plan more clearly and directly (2.1.2.1). In particular, reference to plan policies in the ordinances should be reworded to identify the applicable policies more specifically, and references to responsibilities of the "Planning Director" might be replaced with the appropriate title for the person responsible.

In addition, the standards and procedures for the approval of mobile homes are too discretionary to pass LCDC's "St. Helens" test. But while this may be of concern to LCDC, Metro does not feel it jeopardizes compliance because, with the completion of the mobile home park which you indicated was currently being developed, the City will have adequately provided for this type of housing.

All implementing ordinances must be adopted by City Council before the City can be granted compliance acknowledgment.

### Goal #5: Natural Resources:

Other than policy on vegetation as it relates to environmental quality, the City has no policy on the preservation of any of the resources covered by this goal. The plan indicates that none of these resources are present. However, land needed for open space generally (5.1.1), as well as scenic views and sites (5.1.6) and wetlands (5.1.7) are not referred to at all and the "disclaimer" on fish and wildlife habitats is not documented. For these four items, it would be helpful, at a minimum, if the City documented the

reasons why it feels the applicable goal requirements do not apply (e.g., more information on fish residing in the creeks--or the fact that there are none--and on the character of the adjacent riparian vegetation and any resident wildlife).

Goal #6: Air, Water and Land Resource Quality:

The plan contains a thoughtful discussion of environmental quality issues, but there is no data on air or water pollutants and sources or potential violations of state or federal standards (6.1.1 and 6.1.2). In addition, there is no data on existing noise sources or policy on ways to avoid future violations of state noise standards (6.1.4 and 6.2.3.2). Since noise is something over which local jurisdictions do have control, the City should have either policy adequate to protect noise sensitive areas from existing or future noise sources or an explanation of why such policy is not needed or appropriate.

Goal #7: Natural Hazards:

The City's flood hazard provisions do not appear to meet federal requirements for flood insurance (the 100-year floodplain is not identified nor is there policy and implementing measures to regulate development in that area.) While qualification for federal flood hazard insurance is not a direct goal requirement, the City should demonstrate that the failure to do so does not threaten life or property in violation of the goal. The City's drainage plan appears to do much to alleviate this hazard and should be submitted with the plan as part of the City's "compliance package." In addition, supplemental documentation on the extent of the flood hazard and amount of new development which might be affected would be helpful.

Although the City's policy on hazard from steep slopes or soils with low bearing strength due to slow percolation is adequate, steep slope areas are mapped for 25 percent grade, which the plan indicates that all areas with slopes over 20 percent should be subject to special review. In addition, there is no formal implementing measure for these polices. As we discussed, the City engineer's case-by-case review is probably adequate to ensure compliance, but it would be helpful if there were a separate resolution by the City specifying his role and referencing the maps which identify the areas in which such special review is undertaken.

Goal #9: Economy:

One of the policies on p. 22 provides for site design review of industrial and commercial uses. Although the zoning ordinance does provide for design review, no standards for this review have been established. These standards need not be completely nondiscretionary, but they should state clearly what the review is designed to achieve (e.g., adequate traffic circulation or reduction of noise impacts) and how these standards can be met (landscaping, setbacks, etc.). Although adoption of such standards is probably not strictly necessary for compliance with this goal, the formulation of

standards and procedures for reviewing noise impacts on noise sensitive areas would address the requirements of Goal #6, discussed above. They could also provide specific implementation for the City's policy on possible recreational facilities on the Multnomah Kennel Club site.

Goal #10: Housing:

See discussion under regional concerns above.

Also, the policy on p. 25 to review new development to ensure "acceptable quality" is an apparent violation of LCDC's "St. Helens policy" requiring clear and objective review standards for needed housing types. This could be remedied by either adopting clear and objective design review standards or by specifying in the plan that current zoning and subdivisions standards are intended to be adequate for this purpose.

Goal #11: Public Facilities and Services

As we discussed, the reference on p. 26 to a "systems development charge" for water service is confusing, since it is apparently only a fee to cover hook-up changes. Clarification of this point would be helpful.

Goal #12: Transportation

Comments from Metro's Transportation Division are attached. Most of the issues raised can be addressed through ongoing coordination activities and future plan updates but the functional designation for Halsey St. should be added now.

Goal #14: Urbanization

You indicated that the designation of a small strip within City limits as "future residential" was a mapping error; this should be corrected.

JH:ss  
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