

BEFORE THE COUNCIL OF THE
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING) RESOLUTION NO. 81-262
A CONTINUANCE OF THE CITY OF)
RIVERGROVE'S REQUEST FOR) Introduced by the Regional
ACKNOWLEDGMENT OF COMPLIANCE WITH) Development Committee
LCDC GOALS)

WHEREAS, Metro is the designated planning coordination body under ORS 260.385; 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 Rivergrove is now requesting that LCDC acknowledge its Comprehensive Plan as complying with the Statewide Planning Goals; and

WHEREAS, LCDC Goal No. 2 requires that local land use plans be consistent with regional plans; and

WHEREAS, Rivergrove'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 Rivergrove's Comprehensive Plan does not comply with LCDC Goal Nos. 2, 5, 7 and 10; now, therefore,

BE IT RESOLVED,

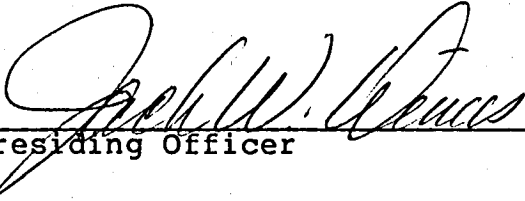
1. That the Metro Council recommends to LCDC that Rivergrove's Comprehensive Plan be continued to correct identified

deficiencies in Goal Nos. 2, 5, 7 and 10.

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

3. That, subsequent to adoption by the Council of any goals and objectives or functional plans after July, 1981, the Council will again review Rivergrove's plan for consistency with regional plans and notify the city of Rivergrove of any changes that may be needed at that time.

ADOPTED by the Council of the Metropolitan Service District
this 23rd day of July, 1981.



Presiding Officer

JC/srb
3316B/236
07/13/81

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

Rec 81-262

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

I. RECOMMENDATIONS:

- A. ACTION REQUESTED: That the Council adopt the attached Resolution recommending that LCDC grant a continuance of the city of Rivergrove's request for acknowledgment of compliance. The Council should act on this item at this meeting in order to ensure that its recommendation is considered by LCDC.
- B. POLICY IMPACT: This acknowledgment recommendation was developed under the "Metro Plan Acknowledgment Review Schedule," June 20, 1980. This process provides jurisdictions an opportunity to work with Metro staff and interested parties to discuss and clarify acknowledgment issues prior to Regional Development Committee action.
- C. BUDGET IMPACT: None

II. ANALYSIS:

- A. BACKGROUND: Rivergrove submitted its plan to LCDC for acknowledgment in August, 1980. LCDC has scheduled a hearing on the City's request for acknowledgment for August 1981.

Metro conducted a draft review of the Rivergrove plan and forwarded a copy of its comments to the City at that time.

Rivergrove is a very small community located on the Tualatin River south of Lake Oswego. Its 1980 population was 314. The City's planning area contains about 10 acres of vacant buildable residential land.

The present Rivergrove Comprehensive Plan was prepared with technical assistance financed by Metro.

Staff's position is that Council should recommend that LCDC grant the City a continuance to correct deficiencies under Goal Nos. 2, 5, 7 and 10. For the most part the changes needed are minor, but should be accomplished prior to acknowledgment.

Rivergrove's plan violates Goal No. 2 because there are a number of specific plan policies that are not implemented

by the City's development ordinance. These unimplemented policies are discussed under the substantive goals to which they apply.

Goal No. 5 requires that the City identify, and where possible, protect natural resources. The City discusses but does not inventory or protect Rivergrove's wetland resources.

Goal No. 7 requires an inventory and analysis of natural hazards. Rivergrove has identified such hazards, but has not adopted clear policies or maps to preclude development in high water table areas.

Rivergrove's plan designates most of the City "residential" but does not specify allowable densities. Plan policies allow apartments, but the City's ordinances establish vague and discretionary criteria for multi-family housing. These provisions may violate Goal No. 2 and the LCDC "St. Helens" policy.

Metro staff met with the Chairman of the Rivergrove Planning Commission to review Metro's comments. The City agrees that each of the issues raised appears to represent a problem and is committed to work with Metro to develop a solution.

The Metro Staff Report and recommendation was prepared according to the "Metro Plan Acknowledgment Review Schedule," June 20, 1980. Under the previous plan review procedures, the Regional Development Committee was provided with a complete Plan Acknowledgment Review Report. An "Acknowledgment Issues Summary" for each plan, developed from a "Plan Review Work Session" involving the jurisdiction, interested parties and Metro staff is attached. The Summary identifies acknowledgment issues raised at the Work Session, describing areas of agreement and presenting the Metro staff position and rationale on unresolved issues.

- 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.

JC:srb
3317B/236
07/13/81

RIVERGROVE ACKNOWLEDGEMENT REVIEW

INTRODUCTION:

Rivergrove is a very small community located on the north bank of the Tualatin River between the cities of Tualatin and Lake Oswego. Its 1980 population was 314 persons. The City has about 10 vacant buildable acres and does not anticipate any significant population growth. All land use within Rivergrove is residential.

Metro and Rivergrove have enjoyed a special planning relationship. Metro's financial assistance, under the Small Cities Assistance Program, enabled Rivergrove to hire a group of planning students from the University of Oregon to help prepare the City's Comprehensive Plan. Metro staff have also worked closely with the City in the preparation of its plan. City representatives have reviewed the Metro objections and believe that the City can deal with these matters under an LCDC Continuance.

Basis For Metro Review

Rivergrove presented a draft comprehensive plan and submitted it to Metro in 1980. Metro prepared a draft review at that time and provided the City with its comments. Many of Metro's comments have been addressed. The City has yet to correct, however, a number of deficiencies. Those deficiencies are outlined in the remainder of this review.

General Requirements

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with general planning requirements.

Goal No. 1, Citizen Involvement

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 1, Citizen Involvement.

Goal No. 2, Land Use Planning

Metro's draft plan review noted that the City had failed to adopt ordinances and other measures to implement all of its plan policies. Goal No. 2 requires that the City have such implementing measures where plan policies alone are insufficient to implement requirements of specific Statewide Goals. This plan review notes specific deficiencies under Goal No. 5 (Natural Resources) and Goal No. 7 (Natural Hazards). Metro recommends that the City adopt specific implementing measures under these two other Goals in order to ensure compliance with Goal No. 2 land use planning requirements.

Conclusion: Rivergrove does not comply with Goal No. 2. In order to comply, the City must adopt the identified implementing measures needed to comply with Goal No. 5 and Goal No. 7, below.

Goal No. 3, Agricultural Lands

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 3.

Goal No. 4, Forest Lands

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 4.

Goal No. 5, Natural Resources

Much of Rivergrove's land is adjacent to the Tualatin River or is in the Tualatin River floodplain. Rivergrove has a number of significant wetlands, protection for which is required by Goal No. 5. The City's plan contains references to this wetland and specific policies requiring its protection. However, the City has not adequately mapped these wetland areas or provided needed implementing ordinances that would protect these wetlands.

The City needs to prepare maps illustrating these wetlands and develop specific protective measures in order to comply with Goal No. 5.

Conclusion: Rivergrove does not comply with Goal No. 5. In order to comply the City must prepare a map of its wetland areas and adopt adequate measures for their protection.

Goal No. 6, Air, Water and Land Resources Quality

The Department of Environmental Quality (DEQ) has objected to Rivergrove's plan because the City has not adopted adequate measures to control septic tank runoff into the Tualatin River. Metro staff does not concur with this position. Sewer permitting is within the authority of Clackamas County not the city of Rivergrove. Consequently, this is not a problem with which the City can deal.

The DEQ has also objected that the City does not provide an adequate inventory of solid waste in the City. The City's plan notes that all waste generation is by residential uses, there being no commercial or industrial activity within the City. Metro considers this information, coupled with Rivergrove's participation in the regional Solid Waste Management Plan, as an adequate inventory of Rivergrove's solid waste problem. Consequently, Metro staff does not concur that this is an acknowledgment issue.

Conclusion: Rivergrove complies with Goal No. 6.

Goal No. 7, Areas Subject To Natural Hazards

Rivergrove's plan has identified building hazards as required by Goal No. 7. The plan also includes a policy calling for "appropriate safeguards." The City's plan, however, lacks an implementing ordinance spelling out what these appropriate safeguards are. Goal No. 7 requires not only that the City have such a policy but that it implement the policy through the appropriate ordinances.

Conclusion: Rivergrove does not comply with Goal No. 7. In order to comply, Rivergrove must adopt or make reference to specific measures which implement the City's policy for protecting construction from building hazards.

Goal No. 8, Recreation

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 8.

Goal No. 9, Economy Of The State

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 9.

Goal No. 10, Housing

The Department of Land Conservation and Development (DLCD) noted that Rivergrove has not specifically zoned land for identified needed housing types. In fact, the City's plan designates all privately owned land "residential." DLCD's concern is that the City has not provided for specific needed types of housing. The plan does not, for example, distinguish land for multi-family and single family housing.

Metro believes that this is not an acknowledgment issue. Under a June 10, 1980 memo issued jointly by the DLCD and Metro, Rivergrove is classified as a small city, for which there is no regional housing expectation for either housing mix or density. The rationale behind this classification is that Rivergrove's vacant buildable land, 10 acres, is too small to be of regional significance. Rivergrove will not, therefore, play a significant role in meeting regional housing needs. Metro staff concludes that a single residential zone is adequate provision for Goal No. 10 requirements.

DLCD staff and Metro staff noted that the City has established a number of vague and discretionary approval standards for housing and public facilities under its development ordinances. LCDC's "St. Helens" policy requires that needed housing types be subject only to clear and objective approval standards. Despite the fact that there is no regional housing need, Metro believes that the City is

required by Goal No. 10 to provide such clear and objective standards for the approval of housing. Therefore, the City's existing ordinances appear to violate the requirements of LCDC's "St. Helens" policy. The City should make appropriate changes.

Conclusion: Rivergrove does not comply with Goal No. 10. In order to comply the City needs to eliminate vague and discretionary approval standards which violate the "St. Helens" policy.

Goal No. 11, Public Facilities And Services

The DEQ pointed out that the City had not analyzed or committed itself to any particular means for financing sewers in the unsewered portion of the City. DEQ maintains that Goal No. 11 requires that the City analyze possible means for financing sewers. City representatives pointed out, and Metro staff concurs, that in today's unstable fiscal climate it is difficult for the City to make any commitments on financing sewer alternatives. Moreover, the City's plan commits the City to working with sewer providers in the area--Washington and Clackamas Counties, cities of Tualatin and Lake Oswego--to investigate sewer service provision alternatives for Rivergrove. The City is committed to developing such a plan by 1984. City representatives feel that this is the appropriate vehicle for investigating financing alternatives. Metro staff concurs with the City's judgment in this matter and does not agree with DEQ's objection.

Conclusion: Rivergrove complies with Goal No. 11.

Goal No. 12, Transportation

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 12.

Goal No. 13, Energy Conservation

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 13.

Goal No. 14, Urbanization

No acknowledgment issues were identified.

Conclusion: Rivergrove complies with Goal No. 14.

JC/gl
3678B/249

Metropolitan Service District

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

Memorandum

Date: April 18, 1980
To: Leon Skiles, Project Manager
From: Kenneth Lerner, Metro Plan Review
Subject: Review of the Draft of the Rivergrove Comprehensive Plan

I would like to thank you for having met with us on April 7, 1980, to discuss the completed Rivergrove draft plan. We find that much good and thorough work has gone into the inventory, analysis and policy development of the City's plan by your group.

In our meeting, we discussed the major areas which still needed clarification and additional information. It is our understanding that these items, as well as others identified in the attached review, will be addressed. The review is based on the "Metro/DLCD Plan Review Manual" checklist.

The review attempts to cover all regional and State issues. Those items of regional concern have been noted with an asterisk (*). Items of regional concern which are essential for a favorable recommendation from Metro have been noted with an "E."

Suggestions for solving plan deficiencies have been included in this review. Metro's suggestions of what we feel are adequate for protection of regional concerns (to receive a favorable recommendation from Metro) do not necessarily represent LCDC's view of adequacy. If you have any questions on the LCDC requirements for any of the checklist items, we strongly suggest that you contact the DLCD review team at an early date to determine what more may have to be done before acknowledgment. If we can assist you in these discussions or in making needed changes, please let us know.

If you have any further concerns or questions about our review, please do not hesitate to contact us at the Metro office.

KL:bk
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RIVERGROVE DRAFT REVIEW

0. General Requirements

The following items have been identified as missing from your plan package and will have to be submitted for compliance acknowledgment by LCDC:

*(E) (0.1.1.1) The draft plan did not include a comprehensive plan map that indicates proposed planning designations. This must be submitted for acknowledgment in order for LCDC to start the 90-day clock for acknowledgment review. In addition, the plan map designations must be consistent with the plan policies (see item 2.1.2.1, below).

*(E) (0.1.2, 0.1.2.1, 0.1.3, 0.1.4) Zoning and subdivision ordinances, as well as any other proposed implementing measures were not submitted with the draft plan for review. We understand, however, that a draft of the Ordinance and Development Standards document is currently under review.

(0.1.5, 0.1.5.1) The list of supporting documents is a list of those background reports, special studies, etc., which have not been included with the plan documents submitted for acknowledgment (see the compliance acknowledgment rule in Section III of the Plan Review Manual and Goal #2 language). This list can be included in a letter of submittal and need not be in the plan itself, although the latter is preferable.

(0.1.6) A list of affected agencies is also required and can be included in letter form with the City's acknowledgment request.

(0.1.7) The names of the Committee for Citizen Involvement (CCI) and Citizens' Advisory Committees (CAC) chairpersons should be indicated in the acknowledgment request. While the CAC chairperson's name is optional; the CCI chairperson is mandatory.

*(E) (0.1.8) The plan notes that an Urban Planning Area Agreement (UPAA) has been completed with Clackamas County. Another UPAA should be completed with Washington County prior to final plan adoption. As an additional requirement to meet Goal #2, a similar agreement should be secured with all special districts serving lands within the Rivergrove city limits. A letter from these districts stating they are able to provide service commensurate with the comprehensive plan, or documentation that they were notified of their opportunity for review and had no objection or did not comment, is sufficient to meet this requirement.

Goal #1: Citizen Involvement

(1.2, 1.3) The plan did not have the approval date of the City's CCI and Citizen Involvement Program (CIP) by LCDC. Please include these dates in the final plan.

(1.6) The CCI should conduct a final evaluation of the citizen involvement process, addressing the six goal requirements, and submit it with the final comprehensive plan package.

Goal #2: Land Use Planning

(2.1.1) To demonstrate that you have addressed all inventory requirements of the various goals, a "disclaimer" should be included listing all the resources and hazards, etc. which are not present in the City and for which, therefore, inventory requirements do not apply. Following is a list of inventory requirements which appear not to apply to the City:

- 5.1.8 Wilderness
- 5.1.10 Cultural areas
- 5.1.11 Oregon recreational trails
- 7.1.2 Ocean flooding
- 8.1.1.3 Archeology resources
- 8.1.1.4 Travelways, sports and cultural events
- 8.1.1.5 Camping and recreational lodging
- 8.1.1.6 Trails
- 8.1.1.8 Hunting
- 8.1.1.10 Winter sports
- 8.1.1.11 Mineral resources
- 12.1.1.3 Rail
- 12.1.1.4 Air
- 12.1.1.5 Water
- 12.1.1.8 Pipeline

*E (2.1.2, 2.1.2.1, 2.1.2.2) As noted above (i.e., 0.1.1.1, 0.1.2, 0.1.2.1, 0.1.3 and 0.1.4), the plan map and various implementation measures were not submitted for review. Prior to their review, we urge you to examine each plan policy and ensure that it can be implemented through the zoning or subdivision ordinance or other implementing measures with clear and objective approval standards. It is our understanding that the proposed plan map will include a single designation (i.e., residential) and will be implemented through a land use development ordinance and standards document which will provide for the various needs identified in the plan.

(2.2.1) The list and location of plan documents on file was not submitted (see 0.1.5 and 0.1.5.1, above).

*E (2.2.2.1a and b) Complete copies of the Urban Planning Area Agreements (UPAA) should be submitted with the plan, (see 0.1.8, above).

(2.2.2.2) The City should document the opportunity for agency review and comment during the planning process (the list of affected agencies is a requirement of 0.1.6, above). This can be submitted as part of the acknowledgment request package.

Goal #3: Agricultural Lands

Not applicable to Rivergrove.

Goal #4: Forest Lands

Protection of forest lands as open space is mainly addressed under the open space, scenic and historic areas, and natural resource element of the plan, which provide policies for the protection and consideration of vegetation, particularly in riparian areas. Since Rivergrove is entirely within the adopted regional Urban Growth Boundary (UGB), preservation of commercial forest lands is appropriate only in limited circumstances.

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

(5.2.1, 5.2.2, 5.2.3.1, 5.2.3.2, 5.2.3.3) The plan should identify areas, if any, in which there are conflicting uses, (i.e., areas which allow development but have an open space or resource value). In those areas where no conflicting uses occur (i.e., floodplains) policies must preserve the resources. In those areas identified as having conflicting uses, only those justified by an analysis of economic, social, environmental and energy consequences should be permitted. And those permitted uses must be allowed only in such a manner as to conserve open space and protect natural and scenic resources.

(5.2.4) No plan map was submitted with the draft plan, (see 0.1.1.1, above).

Goal #6: Air, Water and Land Resource Quality

* (6.1.3, 6.1.3.1, 6.1.3.2) The plan will need a statement indicating if there are any problems or violations regarding land quality. The plan does recognize Metro's responsibility for solid waste disposal, but should also include a description of the solid waste disposal problems of the region. This information is also required for Goal #11 compliance.

Goal #7: Areas Subject to Natural Hazards

Adequate for the plan. (However, implementation measures have not been reviewed.)

Goal #8: Recreational Needs

(8.1.1.9, 8.1.1.12) Angling and active and passive games and activities were not addressed in the plan inventory. Since it is likely that these recreational facilities are found in Rivergrove, they should be identified in the plan. If they are not found in the City or its vicinity, then a "disclaimer" statement, as per 2.1.1 above, would be appropriate.

(8.2.6) No plan map designations were submitted; only an inventory map of open space, (see items 0.1.1.1 and 2.1.2.1, above).

Goal #9: Economy of the State

Adequate.

Goal #10: Housing

*(E) The housing goal, as presented in the draft plan, was for the most part adequate to meet the goal requirements. However, as we discussed the relationship of the proposed density of development should be clearly linked to public facilities planning, i.e., to Goal #11, and to existing conditions, in terms of constraints and existing levels and patterns of development.

The following items are in need of clarification:

(10.2.3.1) A statement might be included in the plan that the location of new housing is limited, due to the lack and pattern of vacant buildable land (i.e., basically in-fill situation) and the small size of the City. This can be added to the statement on pages 35-36 regarding the minimal amount of developable land.

*(E) (10.2.5, 10.3.1.1) The plan should have land-use designations for the City (as per item 2.1.2.1). Thus, the vacant land will be designated and implementation measures (i.e., zoning or development codes) can be applied consistent with the plan designations. This will ensure that all identified housing needs (i.e., multi-family, mobile homes) will be able to be met. Also, any approval standards for needed housing types must be clear and objective to avoid conflict with the "St. Helens Policy" of LCDC.

Goal #11: Public Facilities and Services

*(E) (11.1.1.2) For the sewerred portion of Rivergrove the plan did not present current and projected sewer capacity and needs (i.e., flows). This can be estimated and included in the plan as per this goal requirements.

(11.1.1.4) The plan states that a master sewerage plan will be developed and adopted by Rivergrove to service the entire City by 1984. This is adequate for Goal #11 requirements, as it is consistent with the situation in Durham. Durham's plan was acknowledged with a plan policy that required the City to adopt a sewer plan by a date certain.

*(E) (11.1.3, 11.1.3.1, 11.1.3.2, 11.1.3.3, 11.1.3.4) The plan does not present adequate information on the storm drainage situation, further discussion of each of the goal requirements is needed.

*(E) (11.1.5, 11.1.5.1, 11.1.5.2, 11.1.5.3, 11.1.5.4) The plan does not present adequate information on the solid waste situation, (see item 6.1.3, 6.1.3.1, 6.1.3.2, above).

(11.1.8, 11.1.8.2, 11.1.8.3, 11.1.8.4) The plan does not discuss any health services except for a reference to the 911 Emergency Number and the fire department's emergency service. Existing service providers should be inventoried (e.g., nearby hospitals), problems presented (e.g., access to hospitals) and solution proposed (e.g., 911 Emergency Number).

(11.1.10, 11.1.10.1, 11.1.10.2, 11.1.10.3, 11.1.10.4) No information was included in the plan on the provision of general government services. A small city like Rivergrove is not expected to have extensive general government services. However, certain services are necessary, and it should be indicated how they are being provided. This is especially important regarding actions on permits for land use development; it should be determined how proposed implementation measures for comprehensive plan policies will be administered as part of the planning process.

(11.2.2.1) No plan map was submitted, (see items 0.1.1.1 and 2.1.2.1, above).

Goal #12: Transportation

This goal is adequately addressed except for the items requiring "disclaimer" statements, (see item 2.1.1, above), and for one other item:

(12.1.1.6) The plan should inventory any existing pedestrian paths or walkways and include this in the Transportation Element.

Goal #13: Energy Conservation

Adequate. (However, no implementation documents were reviewed.)

Goal #14: Urbanization

The plan does not include an element on urbanization. Language in the plan text refers to all land within the City as being urban (p. 2), and that the existing City limits are considered both immediate and future urban (p. 23). This is somewhat confusing, and we suggest that a section on urbanization be included in the plan to clarify urbanization policies. This section should have policy language that indicates the City's intent. If land is designated "immediate" urban and "future" urban, the Goal #14 conversion criteria will apply. However, if all land in Rivergrove is designated as "immediate" urban, then these conversion criteria would not apply. The latter method appears more appropriate for Rivergrove, as the City is virtually developed with only infill and redevelopment possibilities for growth.

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RIVERGROVE ISSUE SUMMARY

ISSUE

CITY RESPONSE

0. General Requirements

No Acknowledgment Issues Identified

1. Citizen Involvement

No Acknowledgment Issues Identified

2. Land Use Planning

The City has not adopted adequate implementing measures for several plan policies. (Metro, DLCD)

See Specific Implementing Measures, listed below.

Staff Position: The City should adopt implementing policies, described below.

3. Agricultural Lands

No Acknowledgment Issues Identified.

4. Forest Lands

No Acknowledgment Issues Identified

5. Natural Resources

The City has not adequately mapped wetland areas or provided adequate protection. (DLCD)

Staff Position: The City should map wetlands and adopt policies limiting wetland development.

The City agrees that this is a problem.

6. Air, Water and Land Resources Quality

The City has not adopted adequate measures to control septic tank runoff into the Tualatin river. (DEQ)

Staff Position: The City has analyzed its septic tank and water quality problems; septic tank approvals are made by Clackamas County.

The City has not adequately inventoried its solid waste problem. (DEQ)

The City has adequately addressed its solid waste problem, which is minimal.

Staff Position: This requirement is subsumed by Rivergrove's participation in Metro's Solid Waste Management Plan.

7. Areas Subject to Natural Hazards

The City has identified a number of building hazards, adopted a policy calling for "appropriate safeguards"; the City's implementing ordinance doesn't spell out these safeguards. (DLCD, Metro)

The City agrees that the ordinance could be clarified.

Staff Position: The City should adopt specific measures restricting development in hazard areas.

8. Recreation

No Acknowledgment Issues Identified.

9. Economy of the state

No Acknowledgment Issues Identified.

10. Housing

The City has not zoned land for needed housing types, nor are there minimum or maximum densities. (DLCD)

Staff Position: All land is designated simply "residential"; this does not per se allow for needed housing.

Metro staff and the City will discuss possible plan changes.

The City has established vague and discretionary approval standards for needed housing and public facilities essential to needed housing.

Metro staff and the City will discuss possible changes.

Staff Position: These vague and discretionary standards violate the St. Helens policy.

11. Public Facilities and Services

The City has not analyzed means of financing needed sewers. (DEQ)

Not a problem Rivergrove can now address.

Staff Position: The City is committed to preparing a sewer plan by 1984; this is the appropriate vehicle for considering financing.

12. Transportaton

No Acknowledgment Issues Identified.

13. Energy Conservation

No Acknowledgement Issues Identified

14. Urbanization

No Acknowledgment Issues Identified

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