

BEFORE THE COUNCIL OF THE  
METROPOLITAN SERVICE DISTRICT

FOR THE PURPOSE OF RECOMMENDING	)	Resolution No. 81-276
A CONTINUANCE OF THE CITY OF	)	
WILSONVILLE'S REQUEST FOR	)	Introduced by the
ACKNOWLEDGMENT OF COMPLIANCE WITH	)	Regional Development
LCDC GOALS	)	Committee

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 Wilsonville 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, Wilsonville'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 Wilsonville's Comprehensive Plan does not comply with LCDC Goal Nos. 2, 6, 10 and 11; now, therefore,

BE IT RESOLVED,

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

deficiencies in Goal Nos. 2, 6, 10 and 11.

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

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

ADOPTED by the Council of the Metropolitan Service District  
this 3rd day of September, 1981.

  
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Presiding Officer

JC:srb  
3576B/252  
08/20/81

## Wilsonville Acknowledgement Review

Wilsonville is a small community located at the extreme southern end of the Metro region. Its population, according to the 1980 Census, is 2,918.

The City is distinguished by large parcels of undeveloped land under individual ownership. This is a heritage of its relatively recent agricultural past. Interstate 5 bisects the City and a line of the Burlington Northern Railway runs roughly parallel and to the west of the freeway. The Willamette River runs through the City's southern section.

The present City was incorporated in 1968. In 1971, Wilsonville adopted a General Plan. The plan presently under review is a Comprehensive Plan written in response to Statewide Goals and Guidelines, and regional objectives. This review is intended to highlight issues of regional concern.

### Goal No. 1: Citizen Involvement

No acknowledgement issues of regional concern.

### Goal No. 2: Land Use Planning

The City lacks an adopted Urban Planning Area Agreement (UPAA) with Washington County. About 15 acres of land are involved. At this writing, Metro has been notified that a draft agreement has been written and is scheduled to be adopted by the City in September. A UPAA with Washington County is required to comply with Goal No. 2 coordination requirements.

The City's residential land use designations are confusing and inconsistent with the Zoning Ordinance designations. In addition, the City's Zoning Ordinance and map are inconsistent with and inadequate to carry out the City's planned housing densities, in violation of Goal No. 2 requirements. This inconsistency between planned and zoned land use designations is closely related to the requirements of clear and objective upzoning criteria and is discussed more fully under Goal No. 10.

**CONCLUSION:** Because of the lack of an adopted Urban Planning Area Agreement with Washington County (discussed under General Requirements) and because of inconsistencies between planned and zoned residential land use designations, the plan does not comply with Goal No. 2.

### Goal No. 3: Agricultural Land

Not applicable.

Goal No. 4: Forest Lands

No acknowledgement issues of regional concern.

Goal No. 5: Natural Resources

No acknowledgement issues of regional concern.

The Oregon Business Planning Council has submitted written objections regarding the plan's inadequate performance in inventorying natural resources as specified in a newly adopted Oregon Administrative Rule (OAR 660-16-000). Metro has not reviewed the plan for compliance with the new rule, in which any regional interest is indistinguishable from the state interest, and is accordingly best evaluated by state reviewers with expertise in these requirements.

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

The City has inadvertently omitted Metro's "sample language" on air quality coordination, which recognizes the regional State Implementation Plan (SIP) and the City's responsibilities under that plan, including an accurate statement of the region's air quality problems.

DEQ has objected that there are no plan policies ensuring compliance with State water quality standards. Metro believes, however, that the reference to Metro's authority to coordinate water management and waste treatment planning as well as a reference to DEQ's authority in monitoring water quality (Comprehensive Plan, p. 18) constitutes sufficient coordination language.

As discussed under Goal No. 11, the plan also lacks adequate language on solid waste coordination.

CONCLUSION: The City must adopt Metro's "sample language" or its equivalent on air quality and solid waste coordination in order to comply with Goal No. 6.

Goal No. 7: Natural Hazards

No acknowledgement issues of regional concern.

Goal No. 8: Recreation

No acknowledgement issues of regional concern.

Goal No. 9: Economy of the State

No acknowledgement issues of regional concern.

## Goal No. 10: Housing

The City's plan designates residential land into one of five categories, each expressed as a density range (e.g., five to seven units an acre). Although the City's buildable land inventory is not complete, it appears that development to the maximum density allowed by each plan designation is adequate to meet the regional density standard (eight units an acre) and required housing mix (equal numbers of multi-family and single family units allowed) necessary for goal compliance. However, the City's implementing measures are not adequate to insure that development can occur at the maximum density planned for because:

1. the City's current zoning does not allow development by right to the maximum density in each range and there are no clear and objective standards in either the plan or the zoning ordinance specifying the conditions under which development to the maximum planned density will be allowed; and
2. much of the new residential development allowed is subject to mandatory Planned Development and Design Review procedures which contain vague and discretionary standards.

In order to remedy the first problem, the City may either: (1) place all residential land in zones which allow development by right to the maximum density provided in the plan; or (2) adopt clear and objective standards for upzoning the land or otherwise allowing development to the maximum density provided in the plan. The City has indicated its intent to pursue the latter course.

Problems with the Planned Development Standards may be remedied either by making the Planned Development process optional for all development or by making the Planned Development Standards clear and objective. Similarly, the design review standards must be either eliminated or revised.

Finally, the City's buildable lands inventory should be revised to indicate the type and number of units possible based upon the plan and ordinance revisions discussed above. Since the City has not estimated housing potential by type on the grounds that market demands will determine the types of housing to be built, it is worth noting that Metro agrees that a flexible response to the market is desirable, but looks to the buildable lands inventory to demonstrate that the jurisdiction has provided sufficient opportunity for expected market demands to be met.

The State Housing Division objects to plan policies establishing a growth management program based on an annual sewer permit allocation system. According to Metro's understanding, Ordinance No. 112, which established a three-year growth management sewer allocation formula in 1978, expired July 1981, without ever having been put into effect. Further, the City has stated that present sewer capacity is able to accommodate a city population of 25,000 which is far above the desired year 2000 population of 16,000. However, the

Division contends that plan policies allowing future implementation of a program may impose unreasonable limits on the City's ability to meet region housing needs.

Metro does have an interest in seeing that any growth management ordinance the City might adopt in the future provides: (1) adequate insurance that any short- or long-term growth limits are regionally coordinated to avoid any adverse impacts on the regional housing market; and (2) clear and objective standards for all development allowed by that ordinance.

The issue at this time, however, is whether the City's current policy on growth management itself violates the goals (which it does not) or would allow for future adoption of a growth management ordinance that might violate the goals but could not be over-turned on that basis.

Section 3(2) of HB2225 provides that "If a new land use regulation is consistent with specific related land use policies contained in the acknowledged comprehensive plan, [it] shall be considered in compliance with the goals."

Whether or nor the City's current policy would be considered sufficiently "specific" to constitute the only applicable standard for review of a growth management ordinance adopted after acknowledgement is a legal rather than policy issue, better evaluated at the state than the regional level. Accordingly, Metro makes no recommendation on whether or not this policy must be eliminated or supplemented in order to ensure future goal compliance.

1000 Friends of Oregon objects to the Wilsonville Comprehensive Plan on the basis of an excessive amount of industrially zoned land in relation to residentially zoned land which, they argue, unfairly places the burden of housing workers employed in Wilsonville on other communities in the region.

Metro does not believe that this is a goal issue of regional or state concern. Wilsonville's plan provides more than enough housing to accommodate Metro's growth allocation for a city of 16,000 people.

Since Metro's allocation has been reviewed by local planners and is consistent with local plans, Metro can be and is assured that no jurisdiction will be required to shoulder an unfair housing burden in accommodating the region's population as a result of Wilsonville's plan.

In the Metro area, review for consistency with regional density standards and regional growth projections has been used to evaluate Goal No. 10 compliance, in lieu of individual jurisdictions' projections of housing "needs" based on such factors as employment, on the long-recognized grounds that the Metro area housing market is regional rather than jurisdictional in character. Indeed, with the possible exception of Portland residents, fewer than 50 percent of area workers live in the jurisdiction in which they work.

Increasing the housing available in Wilsonville is unlikely to increase the number of Wilsonville workers who choose to live in the city, for whom there is already ample housing opportunity. If anything, the main effect of an increase in the housing supply in Wilsonville would most likely be to increase the peak-hour flow of commuters to the central city, further exacerbating an already difficult transportation problem.

Accordingly, Metro does not believe that the amount of land planned for housing relative to that planned for industrial development is a housing issue of either state or regional concern, and further believes that any required conversion of industrial to residential land would only exacerbate a transportation problem currently of regional concern (see discussion under Goal No. 12).

**CONCLUSION:** In order to address regional interests in Goal No. 10 compliance, the City must:

1. Adopt clear and objective criteria for development at the maximum densities provided for in the plan;
2. Eliminate the mandatory application of the vague and discretionary criteria for Design Review and Planned Development.
3. Prepare a buildable lands inventory based on the above, adequate to show that the City is providing sufficient housing opportunities consistent with regional standards.

#### Goal No. 11: Public Facilities and Services

Jurisdictions in the Metro region consistently have been required to include plan policies which recognize Metro's adopted procedures for siting sanitary landfills within the region. Wilsonville's Plan (pp. 42-43) acknowledges Metro's authority and responsibility for solid waste management planning yet stops short of accepting Metro's adopted landfill siting procedures. Inclusion of the following, or similar, language would be sufficient to satisfy this regional requirement.

"The city of Wilsonville recognizes and supports Metro's 'Procedures for Siting Sanitary Landfill,' and will participate in these procedures as appropriate."

**CONCLUSION:** The City must recognize Metro's "Procedures for Siting Sanitary Landfill" in order to address regional interests in Goal No. 11 compliance.

#### Goal No. 12: Transportation

The number of jobs Wilsonville has planned is substantially higher than projected in Metro's growth allocation and than can be accommodated by existing and committed transportation improvements. The constraints imposed by inadequate road capacity and transit

service would not be alleviated, however, by zoning more land for residential uses. On the other hand, the level of industrial development planned cannot efficiently be realized without a regionally coordinated series of transportation improvements. If needed, a shift in emphasis from labor intensive to land intensive industries (e.g., warehousing) may be the appropriate solution.

The City is aware of this and has included plan policies that condition the approval of new industrial development on an analysis of, among other factors, transportation impacts, and that provide for a revision of land use designations if needed transportation improvements cannot be provided.

Following adoption of the Regional Transportation Plan (RTP) this year, Metro will be in a position to coordinate with the City and the State Department of Transportation (ODOT) on a more detailed evaluation of appropriate transportation/land use options for the area. The City's policies insure that the transportation system will not be overloaded in the interim and that the City will cooperate with Metro and ODOT on implementation of an appropriate solution once one is identified. To require any land use changes in advance of mutual agreement on the appropriate solution is, therefore, unnecessary from a transportation perspective and could have undesirable and unwarranted impacts on the region's economic development.

**CONCLUSION:** The City's plan adequately addresses regional interests in Goal No. 12 compliance.

#### Goal No. 13: Energy Conservation

No acknowledgement issues of regional concern.

#### Goal No. 14: Urbanization

1000 Friends of Oregon has raised a Goal No. 14 objection on the grounds that the amount of land planned for industrial uses creates potential pressure on the UGB around Wilsonville. As discussed under Goal No. 10, Metro does not believe that there is an inadequate supply of housing in Wilsonville nor that the jobs located there will create housing demands which cannot be routinely met in Wilsonville and adjacent cities. In any case, any concerns with how land needs are planned for within the UGB are properly considered under the relevant goals, rather than here. The regional UGB has been acknowledged and neither its location nor its adequacy to accommodate urban growth needs generally are at issue here.

**CONCLUSION:** The City adequately addresses all regional interests in Goal No. 14 compliance.



Goal No. 15: Willamette River Greenway

ODOT has filed an objection on the adequacy of the City's greenway plan. Any regional interest in greenway protection is indistinguishable from the state interest, and is best addressed by the state reviewer with expertise in this area.

CONCLUSION: No acknowledgement issues of regional concern.

MS/os  
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# Metropolitan Service District

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

## Memorandum

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**Date:** March 27, 1980  
**To:** Ben Altman, Comprehensive Planner, City of Wilsonville  
**From:** Ken Lerner, Metro Plan Review  
**Subject:** Draft Elements of the Wilsonville Comprehensive Plan

I would like to thank you for having met with us on February 11, 1980, to discuss the completed plan elements of the Wilsonville Comprehensive Plan. We find that, while still incomplete, much good work has gone into an inventory and analysis of background material and policy development by your staff.

In our meeting we discussed the major goal deficiencies that Metro staff found with the draft plan. They include the following:

1. The plan must explain how the buildable lands inventory was developed. This will provide clarification of how the housing needs analysis was developed;
2. The plan should address Wilsonville's role in meeting its "fair-share" of low and moderate-income housing, as the City is a non-participation in the "Areawide Housing Opportunities Plan";
3. The plan lacks regional coordination language for wastewater treatment and air quality;
4. The proposed urbanization policies are inconsistent with Goal #14 requirements.

It is our understanding that these items, as well as the others identified in the attached report, will be addressed by the City. We also anticipate plan elements not reviewed will be submitted with a complete draft plan in April.

The attached is a review of only those documents submitted. A formal draft review will be done when the plan is submitted with a completed self-evaluation. The review is based on the "Metro/DLCD Plan Review Manual" checklist. The review attempts

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to cover all regional and State issues. Those regional concerns which should be remedied prior to final adoption of the plan and acknowledgment review, have been noted by an asterisk (\*). Those items noted with an "E" are essential for a favorable recommendation from Metro.

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  
7153/111

Attachment

## O. General Requirements

\*E (0.1.1) As discussed at our meeting, there are portions of plan elements that still need to be submitted. These include the background and inventory analysis for economic development, the transportation plan, the citizen involvement program and the revised urbanization policies, (the economic development and transportation materials have recently been received).

\*E (0.1.8) Urban Planning Area Agreements with Clackamas and Washington Counties will be needed. Metro can assist and help coordinate these agreements if necessary.

\*E (0.1.9) As Metro adopts regional plans over time, it may become necessary to request local jurisdictions to amend their plans to be consistent with and adequate to carry out regional plans. The incorporation of the Metro sample language (as per Section III E of the Metro Plan Review Manual), relating to the re-opening of acknowledged plans into Wilsonville's plan will be adequate for compliance.

### Goal #1: Citizen Involvement

This goal was not reviewed since information on the citizen involvement process was not included in the plan package.

### Goal #2: Land Use Planning

(2.1.1) As previously mentioned, certain inventories and plan elements are lacking. In addition, certain individual items within each element are missing which must be addressed. These are indicated under each goal in this review.

(2.1.2) We understand that you are now beginning work on implementation measures to carry out the plan. The plan map and zone map designations being developed should correspond. If the City decides to upzone over time to bring the Plan Map and Zone Map into conformance, then clear and objective approval standards for upzoning should be developed. Metro will need copies of each implementing ordinance and other implementation measures in order to determine their adequacy and consistency with plan policies.

(2.2.1) A list and location of plan documents on file should be included. This can be contained in the letter of submittal.

\*E (2.2.2.1a) Urban Planning Area Agreements (See item 0.1.8).

### Goal #3: Agriculture

Although this goal is not applicable to lands within the Urban Growth Boundary, it is not inappropriate for Wilsonville to adopt agricultural preservation policy in the "future urban" area. The plan does include inventories of agricultural lands and soil types and policies to protect agricultural land that surround the City.

The urbanization policies of the plan which protect the "future urban" area by limiting lot sizes and permitting agricultural use until there is need for conversion for urban level development, are appropriate.

#### Goal #4 Forest Lands

The plan notes that there is no commercial timber in the City. However, it does recognize areas of significant vegetation which are adequately protected under other goals in the plan.

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

The following items are missing in the "Physical Inventory" report:

- (5.1.2) Mineral and aggregate resources
- (5.1.3) Energy Sources
- (5.1.8) Wilderness
- (5.1.9) Historic sites
- (5.1.10) Oregon recreation trails

Any of these items which are not found in Wilsonville should include a "disclaimer" statement so stating. Those items which are found in Wilsonville need to be addressed.

(5.1.2.1) Mineral and aggregate resources were not clearly addressed in the plan, except for reference to Bernert Gravel and its visual impact along the river. Thus, consistency with the Oregon Department of Geology and Mineral Industry/CRAG Study cannot be determined. The study identifies at least one other site in Wilsonville which needs to be included in the plan.

(5.1.13) The Champoeg Scenic Trail and the scenic drive through Wilsonville were not clearly identified. The plan should include a description of these facilities, as per the "Urban Outdoors," regional park and open space study.

(5.2.1, 5.2.3.1, 5.2.3.2 and 5.2.3.3) The plan does not clearly identify areas of conflicting uses except in relation to agriculture. Where there are no conflicting uses, plan policy should preserve the original character of the resource (e.g., natural vegetation, wildlife habitat, scenic areas, water courses, etc.). This issue is addressed in the recommended policies on page 55 of the inventory, however, the policies need to be adopted. Where conflicting uses exist or are anticipated, policy should be developed that will resolve the issue in a manner that will protect the natural resources to the greatest extent possible.

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

(6.1.1.4, 6.2.1.1 and 6.2.2.1) While the plan has good, up-to-date information on air quality, there is no regional language recognizing Metro's and the Department of Environmental Quality's (DEQ) role

in developing a regional strategy, nor are there any policies addressing air quality. At minimum incorporation of the regional "sample language" on air quality should be included.

(6.1.2.4) (6.2.2.3) (6.2.2.4) The plan does not contain '208' sample language which recognizes Metro's responsibilities and coordination role in water quality management and waste treatment planning. While the plan contains good policy for water quality protection and adequate expansion of treatment facilities, the sample language recognizing Metro's regional role should be incorporated into the plan, (see Section III, D, of the Plan Review Manual).

(6.1.4) (6.1.4.1) (6.2.3.2) There is no identification of existing and potential noise problems. DEQ has consistently required that this problem be discussed. This is particularly applicable to Wilsonville due to the proximity of the Interstate 5 Freeway and the designation of industrial areas which may be noise sources. The City needs to include an analysis of existing and potential noise sources and adopt policies to mitigate against their impacts. Inclusion of current noise standards and implementation of noise prevention measures through the zoning ordinance should be adequate to meet this criteria.

(6.2.2.6) Except for addressing the solid waste issue, there are no policies which address coordination or recognition of regional, state or federal roles in protecting the quality of our natural resources. Suggested sample language and recognition of regional, state and federal environmental quality standards should be included to ensure protection of air, land and water quality.

#### Goal #7: Natural Hazards

The Wilsonville plan adequately addresses this goal except for the following:

(7.1.4) The erosion and sedimentation situation is discussed under storm drainage and in the physical inventory. While there is a good discussion of what causes such erosion problems, the actual deposition situation in Wilsonville is not addressed. If this information is contained in the "Meyer's Report," it should be submitted with the comprehensive plan package to LCDC or a summary of its findings (which address each specific criteria item) should be included in the plan. If the report does not provide an identification of a deposition problem, the problem must be addressed in the plan.

#### Goal #8: Recreation Needs

This goal is addressed in the "Public Facilities and Services Background/Part III" report. This report describes existing park and recreational facilities and includes some discussion of future facilities. While this discussion is good, some of the items included in the plan review checklists have not been addressed. The specific items not addressed include:

- (8.1.1.3) History, Archeology and Natural Science Resources
- (8.1.1.8) Hunting
- (8.1.1.9) Angling
- (8.1.1.10) Winter Sports
- (8.1.1.11) Mineral Resources

If any of these activities do not occur within Wilsonville's planning area, a "disclaimer" statement to this effect is needed.

Certain other items which were addressed, but not adequately, (i.e., need additional information or clarification) are listed below:

- (8.1.1.1) Open Space and Scenic Landscapes
- (8.1.1.4) Scenic Roads, Travelways, Sports, Cultural Events (also see 5.1.13)
- (8.1.1.7) Waterway Use Facilities (this can be included in the Willamette River Greenway Chapter)

(8.1.2 and 8.2.2.3) The plan inventories, while good, omit certain resources identified in the "Urban Outdoors" report. Specifically, the scenic trail and scenic drive route as noted in Goal #5, item (5.1.13).

(8.2.1), (8.2.2.2 and 8.2.5) There is some discussion on the adequacy of existing park land and recreational facilities. However, there is no specific park and recreational needs analysis. A determination of the adequacy of the proportion of land to population could be used to satisfy this requirement. Policies could then be developed to show how the recreation needs of the City will be met, i.e., are existing and neighboring parks adequate or will additional parks be needed, and how will they be provided?

(8.2.2.4) No coordination efforts with other agencies are discussed in the plan. It would be helpful if the plan stated that Wilsonville will cooperate with state and other park and recreation agencies in the provision of recreational opportunities.

#### Goal #9 Economy of the State

The "Economic Development Background Research/Analysis" report and the "Economic Development Plan Element" were reviewed. The background report includes an extensive regional and local economic development analysis, and the plan element focuses on policies and objectives.

The items on the checklist were well covered, with the following exception:

- (9.2.1) The "Alternative Goals and Objectives" report includes sets of alternative commercial and industrial goals and objectives. The resulting objectives and policies established in the plan element, however, do not correspond to these alternatives. There is no indication how the alternatives were

\*E (10.2.2.3..a) The Wilsonville plan, in order to meet Goal #10 requirements for housing opportunities, will have to contain information and findings about their role in the regional housing market. Goal #10 requires that a jurisdiction must encourage adequate housing at various costs to meet the needs of all income level households.

In the Metro region the "Areawide Housing Opportunity Plan" (HOP) has been developed as a regional assessment of assisted housing needs and a "fair-share" distribution of assisted units. Since Wilsonville has declined to participate in the HOP, the City's plan must include a regional housing analysis that indicates Wilsonville's role in providing for its assisted housing needs. The Housing Element of the plan does include an extensive regional housing analysis but fails to focus on Wilsonville's role in providing a "fair share" of assisted housing or any low income housing based on the expected need for low cost housing in the City.

The City should identify the existing and three year (1980-83) need for assisted housing and how Wilsonville will meet this need. Following are suggested options by which Wilsonville may address these requirements:

1. The City will need to identify the existing and the expected to reside number of low income households needing assistance. Low income households are defined as all households whose incomes are below 80 percent of the regional median income.

It is likely that the 1970 census data is too old to be viable for this analysis. Therefore, we would anticipate updated census or recent Citywide survey results to be used. The most economical survey would be a 6-15 percent random sample. However, we caution the City that obtaining income information is extremely difficult.

Once the income data for Wilsonville is updated, the 80 percent of median income figure (i.e., \$14,560) can be used to establish the total number of low-income households.

In order to determine which low-income households are in need of assistance, the following criteria is applied:

- a. Households paying above 25 percent of their income for housing;
- b. Households having more than one person per room (i.e., overcrowded); or
- c. Households residing in a substandard dwelling unit.



considered nor how the final policies were determined. The plan should present a discussion on how the alternatives were analyzed in relation to the objectives and policies adopted.

Goal #10: Housing

E (10.2.1 and 10.2.2) Although the plan presents a buildable lands inventory by plan designation (Table XXXX), there is no indication of how buildable lands and constrained lands (i.e. lands subject to hazards and other physical constraints) were distinguished. Your analysis should identify total vacant lands, total constrained lands and the difference being the gross "buildable" acres. Further, land needed for streets and other public and semi-public lands should be subtracted from the gross to identify the "net" buildable acres. Taking into account the projected population to the year 2000, vacancy rates and household size, a total number of needed housing units can be determined. The City's land use designations should be allocated in a manner that would meet the anticipated housing need based on the number of existing housing units and net vacant buildable acres.

Based on the buildable land inventory submitted in the plan, Metro conducted a cursory review of the City's capacity to provide housing for its expected population for a determination of the City's single family/multi-family housing split.

The following methodology was used to calculate population holding capacity:

	Buildable land by plan designation
-	<u>Non-residential use (20%)</u>
=	Buildable land available for development
X	<u>Average density in units per plan designation</u>
=	Net units by plan designation
X	<u>Persons per unit (2.5)</u>
=	Population for each plan designation

Based on this inventory, the sum of the total population of each of the designations (17,323) indicates that the capacity of Wilsonville is adequate for the proposed year 2000 population projection of 16,000.

The buildable lands inventory and the plan designations indicates a single family/multi-family mix for new units that is above Metro's expectations of a 50/50 mix level.

The need for a variety of housing by type, location, and price and rent is addressed as goal objectives and policy. An evaluation of these needs, however, has not been submitted for review. We recommend a discussion of need, showing actual numbers of needed housing by type, as delineated above, be included in the plan.

To address all of the above criteria, the City will have to provide updated census data or survey information that will identify not only household income but also the total spent on housing, the number of persons and rooms per household and the condition of each structure. While the condition of structure information may have been part of the general inventories for Goal #10, the substandard dwelling will need to be directly correlated with the sample household.

Once the existing number of low-income households in need of assistance has been established, the "expected to reside" (i.e., the future population) must then be determined.

This can most easily be accomplished by comparison with the County (see Areawide Housing Opportunities Plan, Metro, 1979, p. 23). By dividing the number of households in Wilsonville in need of assistance by those within Clackamas County, a relationship in the form of a percentage can be established. This percentage can then be applied to Clackamas County's "expected to reside" (i.e., 1,177 for October, 1980 - October, 1983) with a resulting "expected to reside" for Wilsonville.

As a final step, the expected to reside number must be qualified by Wilsonville's employment opportunities. A survey will have to be carried out which identifies: of those low-income households working in the City, how many workers live in the City and how many live outside the City. This same categorization must also be established for anticipated new jobs over the next three years (i.e., by October, 1983). It is through this type of analysis that Wilsonville will justify an equal to, greater than or lesser than share of the County/regional share of low-income households in need of assistance.

2. Another alternative available to the City is to use the regionwide estimated average of housing in need of assistance, as established in the HOP. This figure, 13.37 percent of the total housing units, can be a basis for Wilsonville's determination by using this regionwide average and adjusting it with employment expectations as described in #1 above. This may result, depending on the income levels of employment, on a greater or lesser share of low-income assisted housing than the regional average. In addition, sufficient non-assisted housing will be needed to provide for the needs of those low-income people (based on the HOP) who are not in need of assistance as described in #1 above.

Once the "need" for assisted housing is identified, Wilsonville must then identify how the City will meet this

need. We would assume the City will identify any households presently receiving assistance. Further, participation in the County Housing Assistance Plan (HAP) would be another way of meeting the need. Should Metro receive "Bonus Funds" from HUD, further assistance to jurisdictions who are participating in the HOP would be made available. For Wilsonville to meet its "fair-share" should Bonus Funds become available, the City would need to accept a higher than average share through the County HAP or provide additional assistance through City funds.

3. The simplest way to define the need for assisted housing and meet this need would be for Wilsonville to participate in the HOP, an option that nearly every other jurisdiction in the Metro area has chosen. The HOP is intended to help the cities and counties in the Metro area secure more assisted housing and provide housing units at a cost commensurate with the financial capabilities of households within the region. Regardless of how the City determines housing need and how it will meet that need, we would encourage the City to contact DLCD for direction and assistance. Metro, of course, will provide further assistance upon request, but we cannot totally anticipate what LCDC will require for compliance with Goal #10.

(10.2.3, 10.2.4 and 10.2.5) Since a housing needs analysis and clarification of the buildable lands inventory is needed, as per 10.2.1 and 10.2.2 above, for review, final evaluation of housing densities cannot be made. However, in using the buildable lands data as submitted, an estimated overall density for Wilsonville of 7.5 units per acre was calculated, which is well above the regional average of 6.0 units per acre.

The proposed plan policies are sufficient regarding the encouragement of a variety of housing types and costs.

E (10.3) Implementation measures, when submitted, must include clear and objective approval standards for identified needed housing types, e.g., multi-family, mobile homes and others identified to meet low and moderate income needs.

\*E (10.4.1) Housing Objective #8 (page 2), requires new housing developments to pay an equitable share of the cost of required capital improvements for public services. This is not reflected in any policy, and if implemented by a systems development charge or other measure which will increase housing costs, it must be justified by findings of fact. These findings should examine alternatives and if the least cost impact alternative is not chosen, then the infeasibility of the other alternatives must be shown.

Therefore, terminology should be revised to be more accurate and descriptive.

(14.2.3.2) The "primary/secondary" growth area system proposed by Wilsonville considers all land within these areas as urban. Thus there are no policies that address the conversion of land from "secondary" to "primary." Instead the plan allows development to occur anywhere in these areas, with only a site development review that addresses the provision of adequate facilities. These facilities can be provided by the developer to serve the proposed development. This methodology is not consistent with the Goal #14 conversion requirements per above.

The City argues that it is more cost-effective to develop capital improvements in the form of public facilities services such as sewer, water, drainages and roads at the present time, rather than wait until a future date when facilities are likely to be more expensive. Unfortunately, this argument is only cost beneficial in the short-run. In the long-run, with operating and maintenance costs escalating as well, and only a partial return on the capital improvements due to "leap-frog" patterns, the costs to the City are potentially great. Thus, the large capital investment in these facilities will be, literally, lying in the ground without full return for its designed capacity. This coupled with higher operating and maintenance expenses, incurred not by a single developer but by the entire City, cannot be considered as providing services in an efficient manner. In addition, current high interest rates may only be cyclical and it may, in fact, be cheaper to develop facilities later.

Therefore, Wilsonville should reassess the efficiency of allowing sprawled development in favor of efficient phasing possibly in conjunction with industrial expansion. The City should adopt plan policies that will protect these "secondary" areas from uncontrolled non-contiguous growth and provide for the efficient provision of urban level public facilities and services. These policies should be consistent with the requirements of the "Land Use Framework Element" and Goal #14 as summarized in the Plan Review Manual Checklist. The Metro guidelines used in protecting urban sprawl in unincorporated areas should be examined for application to the situation in Wilsonville.

If the current approach is kept, it should be clearly and carefully justified as: (1) cost effective in both the short and long-run; (2) not increasing the cost of housing; and (3) allowing for development consistent with urban levels as proposed in the comprehensive plan.

#### Goal #15 Willamette River Greenway

The Wilsonville plan discusses the Willamette River Greenway in the "Physical Inventory" report. The report includes a good inventory of existing and future (approved) uses in the greenway. The current boundary of the greenway does not conform to the adopted State

## Goal 11: Public Facilities

(11.1.8 and 11.1.10) The plan's evaluation of both health or government services are incomplete. Existing services should be inventoried, service providers identified, problems presented and solutions proposed.

\*E (11.2.2.3) As discussed under Goal #6 of this review the Wilsonville plan contains regional language only for solid waste disposal siting alternatives. The plan does not specifically mention the "208," Wastewater Treatment Management Component (WTMC), nor the State Implementation Plan for Air Quality (SIP). Recognition of Metro's regional responsibilities and coordination role for these programs will be required for compliance acknowledgment.

## Goal 12: Transportation

Metro will review the Wilsonville Transportation Plan at a later date in conjunction with the Metro Transportation Division and ODOT.

## Goal #13 Energy Conservation

Will be reviewed by Metro upon submittal of the relevant plan documents.

## Goal #14: Urbanization

\*E (14.2.3.1) Wilsonville's urbanization program relies on a designation of "immediate" and "future" urban land. The latter designation is reserved for approximately 350 acres located northwest of Wilsonville, between the City limits and the regional Urban Growth Boundary. This area is protected by policies that limit development and parcelization.

The "immediate" urban designation includes the entire existing City limits and is divided into two subclassifications "primary" and "secondary" growth areas. These areas are distinguished as follows: The "primary" designation places a priority on contiguous development in order to concentrate capital improvements from the center of the City outward to provide for "maximum efficiency in the street system." The "secondary" designation is a "temporary growth control" based on the need for (i.e., limitation of) service line extensions and/or constraints on existing roads or storm drainage.

Since "secondary" lands are not available for immediate development, an "immediate urban" designation is misleading and confusing. In essence, "secondary" lands are "urbanizable" in terms of Goal #14. Goal #14 requires that conversion of urbanizable (secondary) to urban (primary) includes consideration of both; (1) orderly economic provision for public facilities and services; and (2) encouragement of development within urban area before conversion of urbanizable areas.

boundary but the plan states that "it (the plan) will include the adopted boundary in the current Comprehensive Plan update process." This will be required for compliance acknowledgment. The existing review process for greenway developments requires a conditional use permit process in which the Planning Commission review any intensification, change of use, or commercial, industrial or residential development and it must also be compatible with the intent of the State Greenway Plan. However, the actual Ordinance has not been submitted for review.

The items lacking from this goal are: 1) Proposed Greenway acquisition areas are not shown. If there are no such areas within Wilsonville, then a statement to that affect needs to be included in the plan; and 2) there was no policy document submitted with the plan that indicated specific greenway policies. Specific policies are needed for insuring that management of greenway land will maintain the quality of the greenway, and be consistent with the State Greenway Plan (which is included in the City's Greenway Ordinance according to the Physical Inventories report.)

cc: Tom O'Connor, Metro  
Linda Macpherson, DLCD  
Greg Winterowd, DLCD

KL:bk  
7153/111

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

*Res 81-276*

TO: Metro Council  
FROM: Executive Officer  
SUBJECT: Recommending a Continuance of the City of Wilsonville'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 Wilsonville'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: Wilsonville is an island of urban land outside the contiguous UGB, located on the southern fringe of the metro area. The City's population nearly tripled in the last ten years, rising from 1001 in 1970 to 2920 in 1980. Growth is likely to accelerate in coming years; Wilsonville's plan projects 12,000 more people and almost 20,000 new employees in the next 20 years.

Metro conducted a draft review of the Wilsonville plan in March, 1980 and forwarded its comments to the City at that time. Wilsonville submitted its plan to LCDC for acknowledgment in August, 1980. LCDC had scheduled a hearing on the City's request for acknowledgment for August 1981. Because of a major plan amendment prompted by a proposal by the Nike Corporation to build its new headquarters in Wilsonville, LCDC postponed the City's acknowledgment hearing until September 1981, and extended the comment deadline to August 3, 1981, in order to give interested parties a chance to review the amendment. The attached Review includes Metro's comments on the Nike plan amendment.

At their August 10 meeting, the Regional Development Committee voted to recommend Council adoption of the attached Resolution recommending that LCDC grant the City

a continuance to correct deficiencies under Goal Nos. 2, 6, 10 and 11.

Wilsonville's plan violates Goal No. 2 because the City has not concluded an urban planning area agreement with Washington County and because zoning is not consistent with plan designations.

Wilsonville's plan lacks regionally-required air quality inventory and coordination language and, therefore, violates Goal No. 6.

Wilsonville's plan has several vague and discretionary approval procedures that affect its ability to achieve densities and housing mix consistent with regional expectations. Wilsonville's plan, therefore, does not comply with Goal No. 10.

In the Metro region, Goal No. 11 requires recognition of Metro's responsibility for solid waste disposal. Wilsonville has not adopted regionally-required language recognizing Metro's Solid Waste Management Plan and procedure for siting a sanitary landfill.

These issues are discussed in the attached Acknowledgement Review (Exhibit A) which explains more fully Metro's position on those aspects of the plan that are of regional concern.

Wilsonville recognizes most of these problems and has agreed to work with Metro and LCDC to seek their resolution. The City believes, however, that its plan language recognizing Metro's role in solid waste management should be adequate for the Goal compliance and objects to being required to recognize further Metro's "Procedure for Siting Sanitary Landfill."

- 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.

MS:os  
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8/19/81