

Findings of Fact and Conclusions of Law

Ordinance No. 25-1535 amends Metro Code chapter 3.07, *Urban Growth Management Functional Plan (UGMFP)*, and chapter 3.09, *Local Government Boundary Changes*. The following findings of fact and conclusions of law explain how the Metro Council decision to adopt this ordinance complies with relevant state and regional land use goals and provisions.

A. Statewide Planning Goals

Goal 1 – Citizen Involvement:

The amendments were considered at public Metro Technical Advisory Committee (MTAC) meetings on September 17 and October 15, 2025, and at public Metro Policy Advisory Committee (MPAC) meetings on October 22 and November 19, 2025. Notice of the amendments were submitted to the Department of Land Conservation and Development (DLCD) Post Acknowledgement Plan Amendment (PAPA) system 35 days before, and online one week in advance of, the December 4, 2025, public hearing on the amendments with the Metro Council. The adopted amendments will also be provided to all cities and counties in Metro as required by Metro Code.

The amendments do not reduce opportunities for public input. The amendments do repeal requirements in subsection 3.09.070(B) for printing and posting of weatherproof public notice signs, and for newspaper publications of notices, as part of applications for Metro boundary annexation. The amendments also repeal requirements in UGMFP Title 14 for notices of the application period for UGB major amendments to be printed in a newspaper. However, these types of notices provided very limited public awareness. The signs for Metro boundary annexation proceedings, for example, have often been too small to be easily spotted and are posted in undeveloped areas where nearby property owners are already mailed notices directly. The newspaper notices also did not include maps and were in subscription-based publications. The amendments instead require notices to be posted on Metro's free and more accessible website.

Goal 2 – Land Use Planning:

The amendments do not change the planned land use designation or zoning for any property, nor do they amend an urban growth boundary (UGB). The findings here in Exhibit B provide a factual basis for the amendments and demonstrate that they are consistent with statewide planning goals and relevant state and regional requirements.

Goal 3 – Agricultural Lands:

The amendments do not reduce the supply, or change allowed uses, of Goal 3 agricultural land.

Goal 4 – Forest Lands:

The amendments do not reduce the supply, or change allowed uses, of Goal 4 forest land.

Goal 5 – Natural Resources, Scenic and Historic Areas, and Open Spaces:

The amendments do not change any Goal 5 inventory, significance determination, or protection requirement for a natural resource, scenic or historic area, or open space. The amendments do not change the land use plan designation or zoning of any property or amend any UGB. The amendments do codify new Goal 5 related state regulations in Oregon Administrative Rules (OAR) chapter 660, division 23 for providing certain notice to Tribes of proposed UGB amendments. They also clarify, without substantively changing, existing provisions of UGMFP Title 13, *Nature in Neighborhoods*.

Goal 6 – Air, Water and Land Resources Quality:

The amendments do not change any air, water, or land resource quality protection plan or requirement. The amendments to UGMFP Title 3, *Water Quality and Flood Management*, make only the minor, non-substantive changes.

Goal 7 – Areas Subject to Natural Hazards:

The amendments do not change mapping or risk evaluation of any natural hazard or amend any plan or land use regulation related to protection from a natural hazard. The amendments to UGMFP Title 3, *Water Quality and Flood Management*, make only the minor, non-substantive changes.

Goal 8 – Recreational Needs:

The amendments do not change any existing plan for meeting the recreational needs of the region's residents and visitors. The amendments do not concern destination resorts on rural lands.

Goal 9 – Economic Development:

The amendments do not reduce the supply of sites that may be used for employment (e.g., commercial or industrial) uses or modify the protections on industrial and other employment areas that Metro requires of cities and counties (e.g., those in UGMFP Title 4, *Industrial and Other Employment Areas*). The amendments do not adopt or amend an economic opportunity analysis.

Goal 10 – Housing:

The amendments do not change any housing related projection or development standard, nor do they change the plan designation, zoning, or allowable density of any property. Repealing section 3.07.720 and Table 3.07-7 simply removes outdated and already inoperative provisions that were only for the five-year period between 2001 and 2006. The amendments to subsections 3.07.1425(d) and 3.07.1428(b) repeal the text of an already defunct requirement that the Metro Council consider whether a UGB amendment area is adjacent to a city with an acknowledged housing needs analysis that is coordinated with Metro, as cities: no longer conduct their own housing needs analyses as previously understood; get a housing target and need allocation from the state under the Oregon Housing Needs Analysis program; respond with a Housing Production Strategy and Housing Capacity Analysis; and operate on a six-year housing analysis schedule with review done by the state.

Goal 11 – Public Facilities and Services:

The amendments do not change any public facilities or services plan or any requirement related to water, sewer, or other utility services.

Goal 12 – Transportation:

The amendments do not change a transportation system plan (e.g., Metro’s Regional Transportation Plan) or any transportation system requirements.

Goal 13 – Energy Conservation:

The amendments do not change any energy utilization plan or regulation, nor do they change the allocation of land or uses permitted on land identified by Metro as having non-renewable energy sources or change a waste management program.

Goal 14 – Urbanization:

The amendments do not change the location of a UGB, or any policy or regulation related to development of land outside a UGB. The amendments do not concern unincorporated communities or “exception lands”.

Goal 15 – Willamette River Greenway:

The amendments do not change the state’s Greenway Boundary, any Greenway-related inventory, or any land use allowance, development standard, or natural resource protection measure applicable within the Greenway Boundary.

Goal 16 – Estuarine Resources:

The Metro region does not have an estuary subject to Goal 16.

Goal 17 – Coastal Shorelands:

The Metro region does not have coastal shorelands subject to Goal 17.

Goal 18 – Beaches and Dunes:

The Metro region does not have beaches or dunes subject to Goal 18.

Goal 19 – Ocean Resources:

The Metro region does not have ocean resources subject to Goal 19.

B. Metro Code

2.19.080 – Metro Policy Advisory Committee (MPAC)

(a) Purpose. The purpose of MPAC is to advise the Metro Council and perform the duties assigned to it by the Metro Charter and to perform other duties that the Metro Council shall prescribe.

At its November 19, 2025, meeting, MPAC considered and voted to recommend approval by the Metro Council of the amendments in Exhibit A.

(c) MPAC may provide in its bylaws for the creation of a Technical Advisory Committee, which may make recommendations to MPAC.

MTAC considered the amendments at public meetings on September 17 and October 15, 2025, before recommending them to MPAC.

3.07.810 – Compliance with the Functional Plan

(b) Cities and counties shall amend their comprehensive plans and land use regulations to comply with the functional plan, or an amendment to the functional plan, within two years after acknowledgement of the functional plan or amendment, or after any later date specified by the Metro Council in the ordinance adopting or amending the functional plan. The COO shall notify cities and counties of the acknowledgment date and compliance dates described in subsections (c) and (d).

The amendments do not create new requirements for amendments to local comprehensive plans or land use regulations.