BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF AMENDING)	ORDINANCE NO 99-834
THE METRO URBAN GROWTH)	
BOUNDARY AND THE 2040 GROWTH)	
CONCEPT MAP IN ORDINANCE 95-)	Introduced by Growth Management
625A IN THE URBAN RESERVE AREAS)	Committee
39 AND 41 IN CLACKAMAS COUNTY)	

WHEREAS, the Metro Council designated urban reserve areas in Ordinance No. 96-655E, including urban reserve areas 39 and 41; and

WHEREAS, urban reserve study areas were shown on the 2040 Growth Concept map adopted as part of the Regional Urban Growth Goals and Objectives in Ordinance No. 95-625A and the map was amended by Ordinance No. 96-655E to show urban reserve areas; and

WHEREAS, ORS 197.298(1)(a) requires that land designated as urban reserve land by Metro shall be the first priority land for inclusion in the Metro Urban Growth Boundary; and

WHEREAS, Urban Reserve areas 39 and 41 were the subject of Metro Council
Resolution 98-2729C adopted in December, 1998 which expressed intent to amend the Metro
Urban Growth Boundary pursuant to Metro Code 3.01.015(h)(5) for lands outside the Metro
jurisdictional boundary; and

WHEREAS, in August, 1999 the Metro Council requested that local governments notify Metro of land needs to meet 2040 Growth Concept implementation, including jobs/housing considerations, that could be the subject of the Urban Growth Boundary amendments; and

WHEREAS, the City of Wilsonville responded to the Council's notice requesting Urban Growth Boundary amendments for urban reserve areas 39 and 41; and

WHEREAS, notice of Proposed Amendment for these urban reserve areas 39 and 41, consistent with Metro Code and ORS 197.610(1), was received by the Oregon Department of Land Conservation and Development at least 45 days prior to the November 18, 1999 first evidentiary hearing; and

WHEREAS, notice of hearings was published and mailed in compliance with Metro Code 3.01.050(b), (c) and (d); and

WHEREAS, hearings were held before the Council Growth Management Committee on November 16, December 7 and 9, 1999, and before the full Metro Council on November 18, December 2, 9 and 16, 1999; and

WHEREAS, the staff report for these areas was available at least seven days prior to the December 16, 1999 final hearing; and

WHEREAS, the Metro Council considered all the evidence in the record, including public testimony at the November, and December, 1999 public hearings to decide proposed amendments to the Urban Growth Boundary; and

WHEREAS, the Metro Code requires that all land added to the Metro Urban Growth Boundary shall be subject to comprehensive plan amendments consistent with Title 11 of the Urban Growth Management Functional Plan and consistency with the 2040 Growth Concept; now therefore,

THE METRO COUNCIL HEREBY ORDAINS AS FOLLOWS:

1. The City of Wilsonville shall be the local government responsible for adopting comprehensive plan amendments consistent with the Urban Growth Management Functional Plan for areas added to the Metro Urban Growth Boundary by this ordinance.

- 2. Regional design types consistent with the City of Wilsonville's special land need for housing and the Metro 2040 Growth Concept for the land added to the Metro Urban Growth Boundary by this ordinance as shown on attached Exhibit A are hereby adopted.
- 3. The 2040 Growth Concept map adopted as part of Ordinance No. 95-625A is hereby amended to show the Metro Urban Growth Boundary amendment in Exhibit B as within the UGB, instead of urban reserves.
- 4. The Metro Urban Growth Boundary is hereby amended to add urban reserve areas 39 and 41, as shown on the map in Exhibit B, attached, and incorporated by reference herein. The Council hereby designates the area shown in Exhibit B as the area subject to conceptual planning under Title 11 of the Urban Growth Management Functional Plan, Metro Code 3.07.1110 et seq.
- 5. The City of Wilsonville shall comply with the requirements of the Urban Growth Management Functional Plan, including Title 11, for the land shown in Exhibit B within two years of adoption of this ordinance.
- 6. Pursuant to Metro Code 3.01.040(b)(5) the comprehensive plan text amendments identified in Exhibit C, are necessary to ensure implementation of the 2040 Growth Concept in the area added to the Metro Urban Growth Boundary by this Ordinance.
- 7. This amendment of the Metro Urban Growth Boundary is based on Findings of Fact and Conclusions in Exhibit D, attached hereto and incorporated by reference herein.
- 8. In support of Findings and Conclusions adopted in Exhibit D of this Ordinance, the Council hereby designates as the record herein those documents submitted and before the

Council for consideration on these lands during the period between the October 6, 1998 Growth Management hearing and the December 16, 1999 Metro Council final hearing and final adoption of this ordinance.

9. Consistent with ORS 268.390(3) and ORS 195.025(1), Clackamas County and the City of Wilsonville shall include the area added to the Urban Growth Boundary by this Ordinance as shown on the map in Exhibit B in applicable text and map provisions of their comprehensive plans.

ADOPTED by the Metro Council this 16th day of December 1999.

Rod Monroe, Presiding Officer

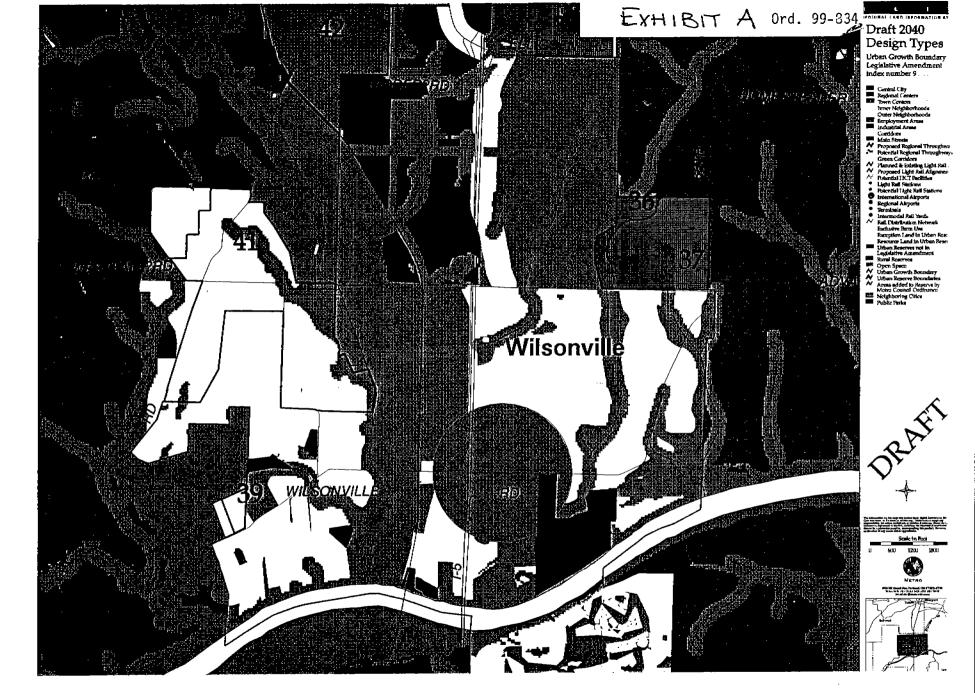
Approved as to Form:

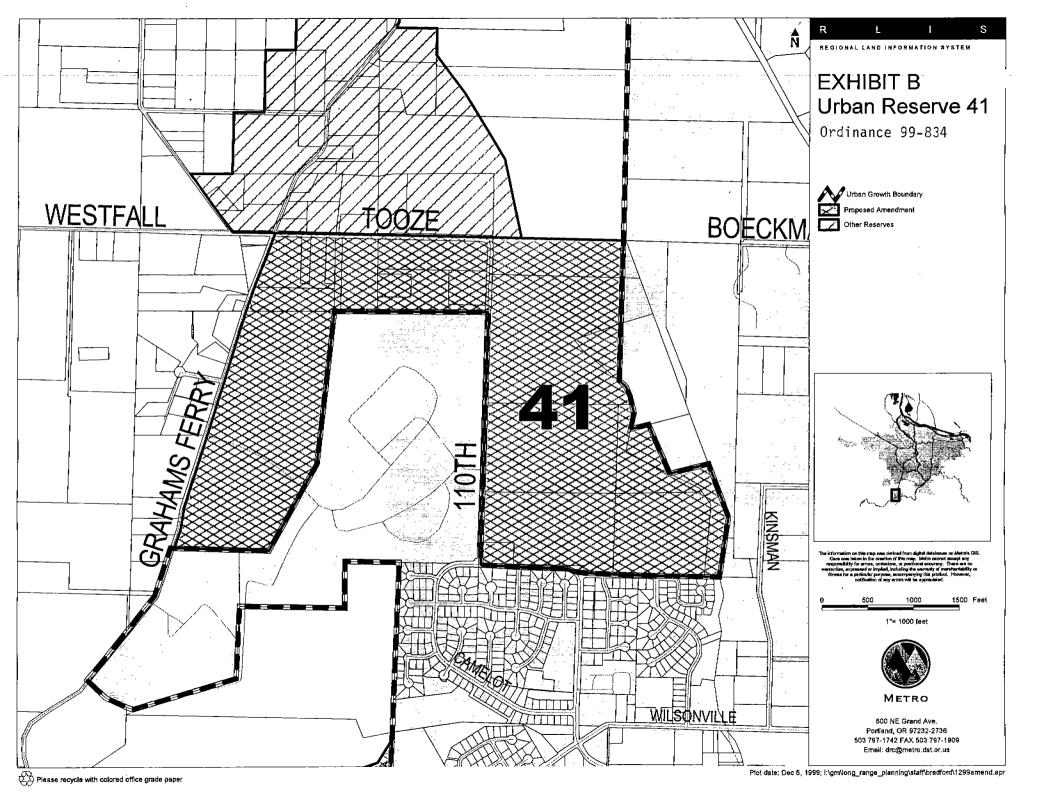
ATTEST:

Recording Secretary

i:\r-o\99-834.02.doc OGC/KDH/kvw 12/06/99

Control A Desigl B. Coor





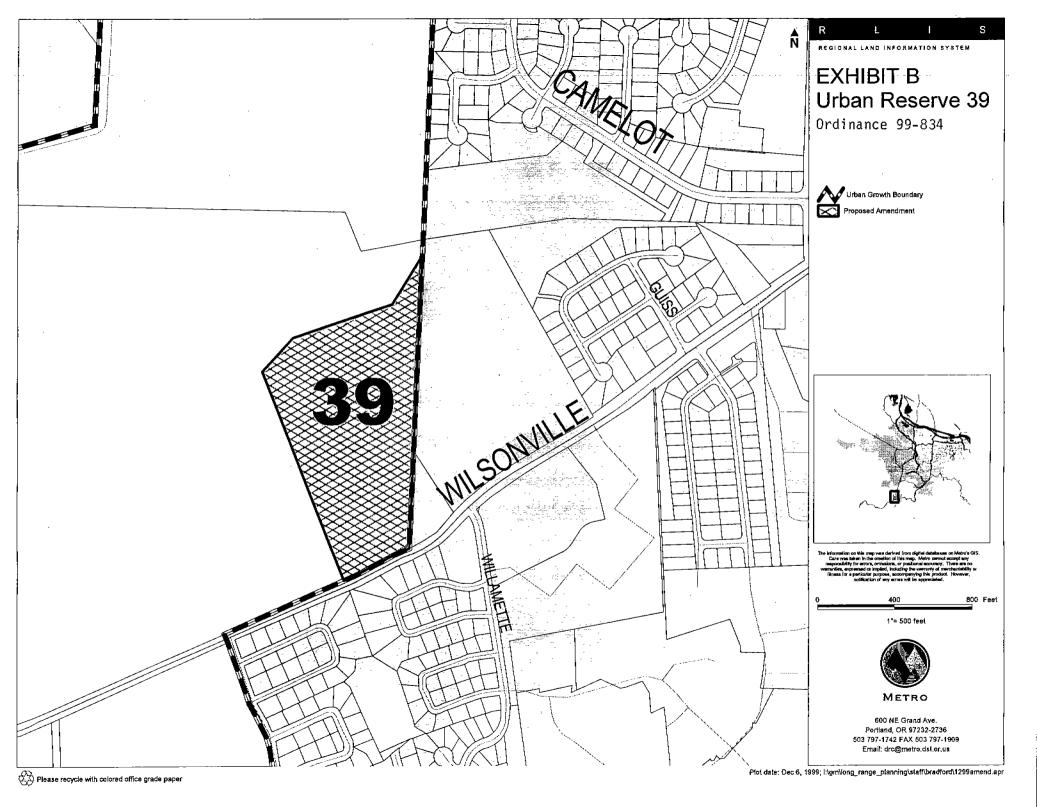


EXHIBIT C Ordinance 99-834

Metro Code 3.01.040(b)(5) allows the Council to adopt text interpretations of the requirements of the Urban Growth Management Functional Plan (UGMFP), which implements the 2040 Growth Concept, in particular Title 11, to "address special land needs that are the basis for the amendment."

The Metro Council finds that the record contains substantial evidence that the requirements of the UGMFP can be met for URA 41 and URA 39. Therefore, it is unnecessary for the Council to adopt text interpretations under Metro Code 3.01.040(b)(5) as part of this ordinance.

EXHIBIT D Ordinance 99-834 (URA 39 and 41) ADOPTED FINDINGS AND CONCLUSIONS

3.01.020(a)

Metro Code section 3.01.020 contains the complete requirements for amending the regional UGB. The code provisions have been acknowledged to comply with Statewide Planning Goals 2 and 14. They satisfy Metro's Regional Growth Goals and Objectives (RUGGO), as well. Application of this section constitutes compliance with ORS 197.298 which sets land priorities for lands amended into the UGB because the lands being added to the UGB are designated urban reserve areas. Since the Metro Code has been acknowledged by the Land Conservation and Development Commission, compliance with this code section satisfies Goals 2 and 14.

3.01.020(b)(1) and (2) General Need Factors

This acknowledged code section corresponds to Factors 1 and 2 of Goal 14. The need for urban growth boundary amendments may be demonstrated, generally, using either Factor 1 or Factor 2 or both. This acknowledged code section predates ORS 197.298(3). Therefore, need may, also, be met by complying with this statute on specific land need.

3.01.020(b)(1)(A) Factor 1

The Metro Code requires that the demonstration of need shall include a forecast of regional population and employment. The forecast must also include a forecast of net developable land need. Concurrent with these forecasts, completion of an inventory of net developable land is required.

The regional population and employment forecast, net developable land need and inventory of developable land are contained in Metro's Urban Growth Report (UGR). On December 18, 1997, the Metro Council adopted the final UGR in Resolution No. 97-2559B to comply with ORS 197.299(1). That final report estimated a UGB capacity deficit from 29,350 to 32,370 dwelling units and 2,900 jobs.

The UGR has two components. It contains the 2017 Regional Forecast which projects households and population, in demand for dwelling units, and demand for employment to the year 2017. This forecast represents an update of the 2015 Regional Forecast which made projections for three separate 25-year growth scenarios - Medium Growth, High Growth and Low Growth. The UGR predicted that the Medium Growth scenario has the highest likelihood of being realized over the 20 year forecast horizon.

The UGR also contains a Buildable Land and Capacity Analysis for the Metro UGB. The analysis estimates the supply of land inside the current UGB sufficient to meet future development for industrial, retail and commercial uses and lands "available and necessary for

Exhibit D – Ordinance 99-834 Page 1 of 9 Metro Office of General Counsel 600 NE Grand Avenue Portland, OR 97232-2736 residential uses" under state law. ORS 197.295(1). The conclusion of the developable lands capacity analysis was that the region does not have a 20-year supply of land inside the current UGB.

Two recent reports update data in the UGR: the Urban Growth Report Addendum (UGRA), and the Urban Growth Boundary Assessment of Need (UGBAN). The UGRA was completed August 26, 1998. The UGRA uses the same methodology as the UGR and updates UGR data in three areas. First, the data on vacant lands were updated from 1994 information to include 1997 data. Second, the analysis of actual residential redevelopment and infill rates were measured for 1995 and 1996 to refine the estimates used in the UGR. Third, the inventory of unbuildable land inside the UGB was revised to better identify land constrained by environmental features.

The UGRA also provides data on two scenarios for assessing the amount of developable land inside the UGB that will be constrained by Title 3 of Metro's Urban Growth Management Functional Plan. These estimates reflect 1998 adoption of the map of Title 3 regulated land. The first scenario calculates total developable land assuming a regionwide 200-foot buffer from the centerline of streams and for steep slopes greater than 25 percent. This assumption is a conservative estimate of additional required buffer widths that could be required as a result of two contingencies, the Endangered Species Act (ESA) listing of lower Columbia River Steelhead and Metro's Fish and Wildlife Habitat planning. The second scenario calculates total developable land assuming only the buffer widths as required by Sections 1-4 of Title 3 on the 1998 map which provide performance standards for regional water quality and flood control.

The UGRA, developed as the most recent data available for 1998 UGB amendments to comply with ORS 197.299(2)(a), did not indicate a need to amend the regionwide need estimate in Resolution No. 97-2559B. In December 1998, the Metro Council adopted urban growth boundary ("UGB") amendments adding about 17,000 dwelling units capacity to the UGB.

Metro Staff have a completed a preliminary draft of Goal 5 analysis and program for Title 3, Section 5 Fish and Wildlife Habitat protection which is coordinated with existing Statewide Planning Goal 5 planning in the region. The draft contains research necessary to determine the scientific basis for riparian buffers beyond those adopted for statewide Goal 6 and 7 purposes in riparian corridors, wetlands. These and other Goal 5 resources are expected to require additional regulation that will be included in a regional functional plan. It is anticipated that the program will be complete and resolutions adopted by June, 2000. See, Resolution No. 99-2855C requesting an extension of time to complete needed regionwide Goal 14, Factor 1 UGB amendments once the remaining need can be estimated from the adopted regulations consistent with ORS 197.296(3). The Council can determine at that time whether regionwide buffers up to 200 but will be necessary to protect identified Goal 5 resources. That information will be included in the required analysis for UGB amendments required to expand the UGB to bring in the remaining one half of needed land as required by ORS 197.299(2)(b).

3.01.020(b)(1)(B)

The Metro Code requires a regional forecast and inventory "along with all other appropriate data" to be completed to determine whether the projected need for land to accommodate the forecast of population and employment is greater than the supply of buildable land inside the UGB.

The adopted 1997 UGR compares the 2017 Regional Forecast with the Buildable Land and Capacity Analysis for the Metro UGB. The UGR found that the current supply of buildable land inside the UGB can accommodate about 217, 430 dwelling units and about 473,100 jobs. However, the regional forecast estimates that by 2017, the housing need will be for approximately 249,800 dwelling units and the employment need with be about 476,000 jobs. This leaves a deficit of developable land inside the current UGB needed to accommodate about 32, 370 dwelling units and 2,900 jobs. The UGR indicated that at an estimated average 2040 Growth Concept density of 10 dwelling units per net developable acre, between 4,100 and 4,800 gross acres need to be added to the regional UGB to accommodate the need to comply with ORS 197.299(2). The Metro Council held a public hearing, providing the opportunity for public comment on Resolution No. 97-2559B on December 18, 1997. In December 1998, the Metro Council adopted urban growth boundary ("UGB") amendments adding about 17,000 dwelling units capacity to the UGB.

3.01.020(b)(1)(C)

Since the inventory of net developable land is less than the forecasted need, the Metro Code requires an analysis to determine whether there is a surplus of developable land in one or more land use categories that could be suitable to meet that need without expanding the UGB.

The UGBAN discusses Metro's Functional Plan, which is an early implementation measure consistent with ORS 197.296. Under its statutory authority to adopt functional plans, Metro may require or recommend changes to the comprehensive plans and implementing ordinances of the 24 cities and three counties in Metro's jurisdiction. In 1996, the Metro Council adopted the Functional Plan which set targets for housing density with the goal of not having to expand the UGB at the time of this five-year need update. However, these targets were set prior to the requirements in ORS 197.299 that Metro must assess the need for developable land and amend the regional UGB to accommodate at least one half of that need in 1998. The Functional Plan requirements direct development of all residential lands at higher densities than existing comprehensive plans. Full compliance with the Functional Plan by all local governments is anticipated in mid 2000. At that time, Metro can more accurately assess the full impact of the Functional Plan.

The UGBAN also considered the potential for conversion of industrial lands to residential uses to address the unmet need. Based on regional review of industrial lands and compliance plans submitted by jurisdictions which have a significant amount of industrial land, the UGBAN concludes there is minimal opportunity to redirect industrial land to accommodate housing

because those areas are already jobs poor or converting employment to housing will have adverse impacts on the 2040 Growth Concept goal of creating complete communities where residents have close access to jobs and services.

3.01.020(b)(1)(D)

Consideration of a legislative amendment requires "review of an analysis of land outside the present UGB to determine areas best suited for expansion of the UGB to meet the identified need" (emphasis added). The identified need is a subregional need to add land to the Washington Square regional center to increase housing capacity of the UGB to improve the jobs/housing ratio for the regional center. That need was focused in the area adjacent to the Wilsonville Town Center. The urban reserves adjacent to the Wilsonville are limited. The ability to use this portion of URA #41 and URA #39 to efficiently develop the Dammasch redevelopment site into a housing community consistent with the 2040 Concept makes it the best suited for expansion of the UGB. See, "urban reserve plan" in the record.

3.01.020(b)(1)(E)

The Council adopts and incorporates by this reference its findings for Metro Code section 3.01.020(b)(1)(C).

This code provision requires that the need identified in the Regional Forecast cannot reasonably be met within the existing UGB. The analysis in the UGR and the updates in the UGRA demonstrate that Metro meticulously reviewed its buildable land inventory, vacant lands and infill and redevelopment rates to identify lands inside the UGB which are suitable for increasing the capacity of the existing UGB. The UGBAN summarizes these efforts. First, Metro considered all net developable land, regardless of parcelization or ownership in calculating existing UGB capacity. All 2040 Growth Concept design plan categories were considered in the UGR and UGRA. Second, an aggressive redevelopment and infill rate of 28.5 percent was initially used in the UGR. Actual data from 1995-1996 refined this estimated rate. Matching the actual rate identified in new data from 1995-1996 in the UGRA, combined with other factors did not significantly change the range of total housing units needed.

Metro's Functional Plan requires the 24 cities and three counties in Metro's jurisdiction to increase densities to more efficiently use residential land. Many local governments amend their comprehensive plans and implementing ordinances for development in residentially designated lands to require 80 percent of zoned density which will maximize the use of newly developed or redeveloped parcels. The effect of the Functional Plan requirements, particularly compliance with Title 3 will be reviewed in 2000 after local governments amend their comprehensive plans to comply with Functional Plan requirements or seek exceptions. That approach is consistent with ORS 197.299(2)(b), and Resolution No. 99-2855C.

3.01.020(b)(2)

Goal 14, Factor 2 authorizes UGB amendments based on consideration of "need for housing, employment opportunities, and livability." In limited judicial interpretations of this Factor it is established that the housing/employment or livability analysis can be based on a subregion of the Metro regional UGB. 1000 Friends v. City of Forest Grove and Metro, 18 Or LUBA 311 (1989). Metro has not adopted a UGB amendment based on subregional need since that case.

The acknowledged 2040 Growth Concept, a key part of acknowledged regional goals and objectives (called "RUGGO"), contains policies encouraging jobs and housing balance within regional centers. The 2040 Growth Concept includes the acknowledged 2040 Growth Concept map that displays the general locations of regional centers and town centers.

LCDC amended its Urban Reserve Rule in 1996 to describe a subregional analysis by regional center area of 100,000 population. Metro's application of that subregional analysis was upheld as applied to a jobs/housing imbalance in the Hillsboro regional center in LUBA No. 97-048 to 97-063 (February 25, 1999) (sections 1.6.2.1 - 1.6.2.3 at pp 79-83). The same subregional analysis, using the same conceptual map of 2040 Growth Concept regional centers is used in the following analysis. This is an analysis of a UGB amendment in the 2040 Growth Concept Town Center of Wilsonville, the Town Center most out of balance in the Washington Square regional center area. Beginning to correct this Town Center jobs/housing imbalance is the best method to begin to correct the Washington Square regional center area jobs/housing imbalance.

A. Regional and Town Center Areas Analysis

The Metro Council hereby adopts the 6 Regional Center <u>areas</u> and the general locations of corresponding Town Center areas indicated on the attached map entitled "Town Centers, Regional Jobs/Housing Balance Analysis" dated December 1, 1999. Washington Square is Regional Center 6. It includes the Town Center areas of King City, Lake Oswego, Lake Grove, Sherwood, Tigard, Tualatin and Wilsonville as indicated in "Exhibit A: Washington County Area Jobs/Housing Ratios By Regional Center and Town Center For 1996 and 2020 Projected" attached from the December, 1999 staff report in the record.

The Metro Council hereby adopts the staff's calculations of the jobs/household ratios for 1996 and 2020 for the Washington Square Regional Center Area of 2.1 and 2.02 respectively and the 1.48 regional ratio without the Portland Central Business District.

The Metro Council hereby determines that 1.48 jobs/household ratios continue to be the "favorable" jobs/housing balance that regional center areas should seek. This is, statistically, the same as the 1.47 jobs/household ratio adopted as the "favorable" subregional jobs/housing ratio for regional center areas in Metro's designation of the 1997 Urban Reserve Area based on 1994 data. LUBA upheld that determination of a "favorable" jobs/housing ratio for the regional center areas outside the Portland "Central City" in the above cited LUBA No. 97-048 at Section 1.6.2.3. at p. 81.

The Metro Council finds and determines that the Washington Square regional center area is significantly out of balance requiring a UGB amendment to improve it because the jobs/household ratio of 2.1 is estimated to improve only slightly by 2020 to 2.02 jobs/household without any UGB amendments to add housing capacity. The Metro Council does not accept the December 1, 1999 staff report recommendation that a ratio of 1.75 should be regarded with some concern" and only ratios exceeding 2.0 are significant. On the basis of the data currently available, the Metro Council finds and determines that Washington Square's estimated ratio of 2.02 jobs/household in 2020 is a significant jobs/housing imbalance. This regional imbalance in the context of the serious imbalance in the Wilsonville Town Center justifies the addition of the approximately 2,300 households in a manner planned to be consistent with the acknowledged 2040 Growth Concept.

The Wilsonville Town Center area is the appropriate location to add housing capacity to the UGB to improve the jobs/housing balance of Washington Square regional center area. The staff presentation explained that of the Town Center estimations inside the Washington Square regional center area using Transportation Analysis Zones ("TAZ"s) Wilsonville has the most serious jobs/housing imbalance. Therefore, the Metro Council finds and determines that the jobs and housing unit data for the Wilsonville city limits of 17,013 jobs and 5,329 housing units in 1996 for a 3.19 ratio of jobs/housing units is a better indicator of the extent of the Wilsonville Town Center jobs/housing imbalance than the staff estimate of a 2.74 ratio.

As the Town Center at the edge of the UGB with the greatest jobs/housing imbalance under either the staff of City of Wilsonville calculation, the Metro Council finds and determines that the Wilsonville Town Center is the best location to improve the Washington Square regional center jobs/housing imbalance by adding housing capacity to the UGB. Specifically, the Metro Council finds and determines that (1) Lake Grove and Lake Oswego Town Centers are to be considered together as one Town Center for purposes of this analysis, and (2) Tigard Town Center is the core "central" Town Center for the Washington Square regional center area. The data indicate that all 3 west side regional center areas, Beaverton, Hillsboro and Washington Square, have core Town Centers with very high jobs/household ratios in 2020. This is a subject for study of possible future refinements of 2040 Growth Concept policies concerning whether the core of regional center areas should accept a higher ratio of jobs, like the Portland Business District.

The Metro Council finds and determines that the "urban reserve plan" in the record is consistent with the City of Wilsonville testimony that land already inside the UGB, the former Dammasch state facility, cannot be efficiently redeveloped for housing uses without the addition of this portion of Urban Reserve Area #41 to the urban growth boundary.

The Metro Council finds and determines that the significant Wilsonville Town Center jobs/housing imbalance is a unique situation that deserves earliest possible connection because it "attracts" employees living outside the regional UGB to Wilsonville jobs. These jobs create a demand for housing, including rural housing outside the UGB, that are within short commuting distance from Wilsonville. As the City testified in its December 9, 1999 letter, it is the most

distant, 12 miles, from the core of the Washington Square regional center. The City's anecdotal evidence is that 41 of 139 city employees (almost 30%) commute from outside the regional UGB. This is supported by Metro transportation staff analysis of work trips to the Wilsonville area. About 33% of work trips to Wilsonville jobs originate outside the Metro UGB. See, Higgins memo December 9, 1999.

B. Urban Reserve Area #39 – 20 Acre School Site

By itself any 20 acre urban reserve is small enough to qualify for he acknowledged "locational adjustment" process which does not even address "need." UGB amendments of this small size do not have a significant impact by themselves on jobs, housing or UGB capacity. However, the unique "urban reserve plan" in the record has planned (1) the redevelopable land at Dammasch inside the UGB, (2) the planned portion of Urban Reserve Area #41, and (3) urban reserve area #39 together.

The record shows that the "urban reserve plan" includes a 7 acre primary school site. The school district indicates that this site is suitable for a primary school for 500 to 550 students. The "urban reserve plan" for URA #41 indicates an additional 2230 households (excluding 225 units planned for seniors). Application of the school district ratios for primary students per household results in a need for at least 150 more students from URA #41 that can be served from a new primary school on URA #39 adjacent to an existing school now inside the UGB.

The school district data indicates a systematic primary school capacity problem that if not addressed on URA #39 the city has indicated would impact the city's housing capacity. The city testified that only about 50 vacant areas remain zoned for housing in Wilsonville. If school are constructed on that land, the jobs/housing imbalance would be worsened.

The Metro Council finds and determines that the closure of the outdated Wilsonville Primary School does not create a replacement site because a school use is inconsistent with the comprehensive plan designation, in a commercial/industrial area surrounded by commercial land uses, railroad tracks and a busy commercial street on the east. Therefore, the additional 20 acre school site, planned together with the "urban reserve plan," is needed to serve the Dammasch – URA #41 area and to avoid displacement of land inside the UGB zoned for housing by construction of a primary school to replace the Wilsonville Primary School. See, Liden memo dated December 8, 1999.

3.01.020(b)(3)

Factor 3

A. Economic Provision of Public Facilities and Services

Cost estimates for wastewater, water, stormwater, roads and transit reflect total buildout based on estimates of dwelling unit and employment capacity in URA 39 and this portion of

URA 41 resulted in a productivity analysis demonstrating that public facilities and services can be economically provided to URA 41 (supported by URA 39). November 24, 1998 Staff Report (Resolution 98-2729A) at pp. 10-13 (hereinafter "Staff Report").

B. Orderly Provision of Public Facilities and Services

URAs 39 and 41 are adjacent to the existing UGB. The studies summarized at pp. 13-18 of the Staff Report, including the Dammasch Plan, demonstrate that necessary services can be integrated with existing services.

3.01.020(b)(4)

Factor 4

A. Efficient Urban Growth Form

The Dammasch Plan accommodates approximately 2,300 housing units, both single and multi-family housing types at varying densities and price ranges. The average dwelling unit density is 10.2 dwelling units per net acre, is a sufficient density to support transit. This Plan indicates that URA 41 (as supported by URA 39) is capable of being developed as a compact community consistent with the 2040 Growth Concept. Maximum efficiency can be accomplished by development consistent with the 2040 design types adopted for this area in this ordinance utilizing a multi-modal transportation system including walking, bicycling, transit and driving. This is explained at pp. 19-20 of the Staff Report.

B. Facilitate Adjacent Urban Growth Form

A school on URA 39 would facilitate efficient growth inside the UGB by providing this public service in closer proximity to existing residential neighborhoods. This allows increased pedestrian, bicycle, and transit use in the vicinity. This school would also serve part of the service needed for URA 41 and the Dammasch State Hospital site already inside the UGB through the Dammasch Plan. This is explained at pp. 20-24 of the Staff Report.

3.01.020(b)(5)

Factor 5

A. Special Protection for Resources or Hazards

There is no evidence that there is any difference between these URAs and other sites for this subfactor. See, Staff Report p 24.

B. <u>Economic Impacts</u>

A regional economic opportunity analysis has not been prepared. However, improvement of the jobs/housing balance by adding this capacity for 2,300 housing units has positive economic impact. *See*, Staff Report pp. 24-25.

C. <u>Long Term Consequences From This Urban Use</u>

The long term impacts of urbanizing URA 39 and 41 can be mitigated so there are no more adverse impacts than the alternative sites. *See*, Staff Report pp. 25-35.

3.01.020(b)(6)

Factor 6

This factor is satisfied. See, Staff Report pp. 35-39.

3.01.020(b)(7)

Factor 7 Compatibility With Nearby Agricultural Activities

There are large areas of EFU zoned properties adjacent to URA 39, 41 outside the UGB. However, the former Dammasch Hospital site is, also, adjacent to URA 41 (served by URA 39). The potential impacts on nearby agricultural activities are considered at pp. 43-44 of the Staff Report.

3.01.020(c) Statewide Planning Goal 2

See, Staff Report pp. 45-96.

3.01.020(d) Clear Transition Between Urban and Rural Lands

The Dammasch Area Plan and the 2040 Design Types required by this ordinance assure smaller lot, multi-family residences toward the center of the plan area with larger lot single family detached residences toward the western edge. *See*, Staff Report pp. 46-47.

3.01.020(e) Other applicable Statewide Planning Goals

Goals 1, 2, 3, 5, 6, 7, 9, 10 are addressed at Staff Report pp. 47-49.

i:\docs#07.p&d\02ugb\02amendm.ent\12legis.amd\lss4-5.02.doc OGC/LSS/kvw (12/13/99)

STAFF REPORT TO THE METRO COUNCIL

Prepared by: J. Bradford, Growth Management

Proposal:

Metro Legislative Amendment - Consideration of Ordinance No. 99-834 for the purpose of adding to designated urban reserve areas for the Portland Metropolitan Area Urban

Growth Boundary.

Urban Reserves:

Urban Reserve Areas (URAs) #39 and #41, Wilsonville

Applicable

Review Criteria:

Metro Code Section 3.01.020.

SECTION 1:

INTRODUCTION AND SITE INFORMATION

Introduction:

The purpose of this report is to provide an update to the November 24, 1998 Metro staff analysis on urban reserve areas #39 and #41 in the Wilsonville Area.

Site Information:

URA #39

Urban reserve #39 consists of 20 EFU acres. The eastern boundary of the area is the Metro UGB and the City of Wilsonville city limits. This area is the proposed site for a school, and is adjacent to public school property to the east, inside of the UGB. The site currently belongs to the State of Oregon, and is being held in the Division of State Lands Common School Fund. It is available to the West Linn-Wilsonville School District, provided that it is used for the construction of a public school. The area is located north of Wilsonville Road, and is a little more than a mile away from I-5. This reserve site has no tree cover. The area is within Clackamas County and is not within the Metro jurisdictional boundary. The June 1998 Metro Urban Reserve Productivity Analysis, which has been used for jobs and dwelling unit estimates in these areas, did not estimate urban reserve #39 to accommodate additional dwelling units or jobs. However, as noted on page 20 of the November 24, 1998 Metro staff analysis, the concept plan for urban reserve #39 estimates that the school will hold approximately 50 teaching and support jobs.

URA #41 (southern portion)

The southern portion of urban reserve #41, or the portion formerly referred to as the first-tier portion, sits south of Tooze Road. This area surrounds the former Dammasch State Hospital, and underwent a master planning process in 1996 (*The Dammasch Area Transportation-Efficient Land Use Plan*). The area consists of 279 acres, 225 of which are EFU. The area is within Clackamas County and is not within the Metro jurisdictional boundary. The annexation application for Metro's jurisdictional boundary applies to 248 acres, excluding several parcels where the owners do not

wish to annex. In addition, as noted in an October 18, 1999 letter to Metro Council's presiding officer from the City of Wilsonville's planning director, the State Legislature has recently acted to require that the State-owned properties in this area be sold for development, subject to the City's master plan.

The Productivity Analysis estimates that the southern portion of urban reserve #41 can accommodate between 1,277 and 1,286 dwelling units, and between 426 and 429 jobs. The Dammasch Plan estimates that the entire planning area, including lands within and outside the urban reserve could accommodate approximately 2,300 housing units, with an average dwelling unit density of 10.2 dwelling units per net acre.

Metro Code amendments no longer require that an urban reserve plan be completed prior to approval of a UGB amendment. Title 11 of the Urban Growth Management Functional Plan now requires that the same concept plan work be completed and approved by the local government before the land is developed.

SECTION II: ADDITIONAL REVIEW CRITERIA

The criteria for a legislative amendment to the UGB are contained in Metro Code Section 3.01.020. They are based primarily on Statewide Planning Goals 2 and 14 and have been acknowledged, or approved by the State as meeting its requirements. The criteria and staff analysis of the factors outlined in the Metro Code are contained in Metro's Staff Report, November 24, 1998 (Resolution No. 98-2729A). Additional information that has appeared since the November 24, 1998 staff report is contained in the sections below.

Factor 1: Demonstrated need to accommodate long-range urban population growth.

Please see page 6 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

As per Metro Resolution 99-2855C, Metro Council has accepted the 1997 Urban Growth Report Update, with additional work to be completed on estimates of capacity in environmentally sensitive areas and capacity from accessory dwelling units. Metro Council has also resolved to request a time extension from the Department of Land Conservation and Development to complete required actions that will ensure a 20-year housing supply in the Urban Growth Boundary. This time extension, to October 31, 2000, will allow Metro to respond to the requirements of State Goal 5, regarding fish and wildlife protection. Estimates from the 1997 Urban Growth Report Update indicate that implementation of Goal 5 could reduce the 20-year buildable land supply by approximately 15,000 dwelling units, resulting in a final deficit of approximately 14,800 dwelling units over the 20-year timeframe.

Factor 2: Need for housing, employment opportunities and livability may be addressed under either subsection (A) or (B) or both.

Please see page 9 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

Urban Reserve #39:

A November 18, 1999 letter from Mike Gates, chairman of the West Linn-Wilsonville School Board (Exhibit B) notes that existing school facilities are insufficient to serve the growth that is expected for this area.

In addition, as noted on page 62 of the November 18, 1999 staff report, the school proposed for this site will contain approximately twice the enrollment of most primary schools. The addition of this school will serve the needs of the broader community. While a school may be included in the Dammasch Area as part of the plan for urban reserve #41, this school is intended to serve only the needs of the Dammasch community.

Urban Reserve #41:

A November 18, 1999 letter from the mayor of the City of Wilsonville to Metro's presiding officer (**Exhibit C**) notes that inclusion of the southern portion of urban reserve #41 would allow the region to accommodate about 2,300 dwelling units on the entire planning area - within one mile of an area with a very high concentration of jobs.

Additional points have been raised regarding the issue of jobs-housing balance.

The November 18, 1999 letter from the mayor of the City of Wilsonville to Metro Council's presiding officer (Exhibit C) counters the approach of analyzing jobs-housing balance at the regional level, which would place Wilsonville with the Washington Square area. The mayor opts, instead, for analyzing jobs-housing balance within smaller sub-regional areas, and notes that inclusion of urban reserve #41 would be the best option for alleviating Wilsonville's relative jobs surplus, as there is a shortage of buildable and redevelopable land in the area.

Metro staff have examined the jobs-housing balance issues in Washington County in a report dated December 1, 1999. A number of different jobs/housing ratios could be calculated based on travel times, geography and home owner preferences. The staff analysis uses a methodology consistent with the urban reserve analysis from 1994, and defines a ratio above 2.00 as jobs rich. A more favorable ratio is estimated at 1.48, representing the current balance for areas outside of the central business district.

Metro (through the RUGGO and the 2040 Growth Concept) and the LCDC concur that subregional need should be demonstrated through a jobs-housing ratio measured across one or more regional center market areas. Most areas smaller than Town Centers have inherent jobs-housing imbalances. The jobs-housing concept recognizes the boundary definition issue, and intends that the concept of balancing jobs and housing should be determined on a wider subregional scale. However, whether job-housing ratios in Wilsonville are examined on a larger geographic area or at a smaller sub-regional level, evidence supports the conclusion that this is a jobs rich area. The analysis shows that the entire Washington Center area is jobs rich, with a jobs-housing ratio of 2.10. This ratio is projected to decline only slightly to 2.02 by the year 2020.

Factor 3: Orderly and economic provision of public facilities and services. An evaluation of this factor shall be based upon the following:

(A) For the purposes of this section, economic provision shall mean the lowest public cost provision of urban services. When comparing alternative sites concerning Factor 3, the bast site shall be that site which has the lowest net increase in the total cost for provision of all urban services. In addition, the comparison may show how the proposal minimizes the cost burden to other areas outside the subject area proposed to the brought into the boundary.

Please see page 10 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(B) For the purposes of this section, orderly shall mean the extension of services from existing serviced areas to those areas which are immediately adjacent and which are consistent with the manner of service provision. For the provision of gravity sanitary sewers, this could mean a higher rating for an area within an already served drainage basin. For the provision of transit, this would mean a higher rating for an area that could be served by the extension of an existing route, rather than an area, which would require an entirely new route.

Please see page 13 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

Factor 4: Maximum efficiency of land uses within and on the fringe of the existing urban area. An evaluation of this factor shall be based on at least the following:

(A) The subject area can be developed with features of an efficient urban growth form including residential and employment densities capable of supporting transit service; residential and employment development patterns capable of encouraging pedestrian, bicycle, and transit use; and the ability to provide for a mix of land uses to meet the needs of residents and employees. If it can be shown that the above factors of compact form can be accommodated more readily in one area than others, the area shall be more favorably considered.

Please see page 19 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(B) The proposed UGB amendment will facilitate achieving an efficient urban growth form on adjacent urban land, consistent with local comprehensive plan policies and regional functional plans, by assisting with achieving residential and employment densities capable of supporting transit service; supporting the evolution of residential and employment development patterns capable of encouraging pedestrian, bicycle, and transit use; and improving the likelihood of realizing a mix of land uses to meet the needs of residents and employees.

Please see page 21 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

In addition, the following information has been submitted since the last staff report regarding urban reserves #39 and #41.

Urban Reserve #39:

A November 18, 1999 letter from Wilsonville's mayor to Metro's presiding officer (Exhibit C) notes that Wilsonville has no other vacant parcels this size that are in close proximity to existing residential neighborhoods. The property is held in trust for the Common School Fund. Thus, the only urban use that can be made of this area is a public school. In addition, as this property is adjacent to an existing middle school, it provides an opportunity for increased efficiency because the adjoining schools can share a parking lot and other facilities.

Urban Reserve #41:

The November 18, 1999 letter from Wilsonville's mayor to Metro's presiding officer (Exhibit C) notes that if the City of Wilsonville is not able to implement the full extent of the Dammasch master plan, "The Dammasch property that is already within the City limits will not be able to be redeveloped to provide much in the way of needed housing." While 1,277 housing units have been reported as a capacity estimate for the portion of the planning area within the UGB, the planning area will develop in whole or not at all; thus the area will achieve approximately 2,300 additional dwelling units, as estimated by the Dammasch Plan, or no additional dwelling units. Surrounding properties are needed to efficiently provide services to the former Dammasch Hospital site.

Factor 5: Environmental, energy, economic and social consequences. An evaluation of this factor shall be based upon consideration of at least the following:

(A) If the subject property contains any resources or hazards subject to special protection identified in the local comprehensive plan and implemented by appropriate land use regulations, findings shall address how urbanization is likely to occur in a manner consistent with these regulations.

Please see page 24 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(B) Complementary and adverse economic impacts shall be identified through review of a regional economic opportunity analysis, if one has been completed. If there is no regional economic opportunity analysis, one may be completed for the subject land.

Please see page 24 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(C) The long term environmental, energy, economic, and social consequences resulting from the use at the proposed site. Adverse impacts shall not be significantly more adverse than would typically result from the needed lands being located in other areas requiring an amendment of the UGB.

Please see page 25 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

Factor 6: Retention of agricultural land. This factor shall be addressed through the following:

- (A) Prior to the designation of urban reserves, the following hierarchy shall be used for identifying priority sites for urban expansion to meet a demonstrated need for urban land:
- (i) Expansion of rural lands excepted from Statewide Planning Goals 3 and 4 in adopted and acknowledged county comprehensive plans. Small amounts of rural resource land adjacent to or surrounded by those "exception lands" may be included with them to improve the efficiency of the boundary amendment. The smallest amount of resource land necessary to achieve improved efficiency shall be included;
- (ii) If there is not enough land as described in (i) above to meet demonstrated need, secondary or equivalent lands, as defined by the State, should be considered;
- (iii) If there is not enough land as described in either (i) or (ii) above, to meet demonstrated need, secondary agricultural resource lands, as defined by the State should be considered;
- (iv) If there is not enough land as described in either (i), (ii) or (iii) above, to meet demonstrated need, primary forest resource lands, as defined by the State, should be considered;
- (v) If there is not enough land as described in either (i), (ii), (iii) or (iv) above, to meet demonstrated need, primary agriculture lands, as defined by the State, may be considered.

Please see page 35 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(B) After urban reserves are designated and adopted, consideration of Factor 6 shall be considered satisfied if the proposed amendment is wholly within an area designated as an urban reserve.

Please see page 35 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(C) After urban reserves are designated and adopted, a proposed amendment for land not wholly within and urban reserve must also demonstrate that the need cannot be satisfied within urban reserves.

Please see page 35 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

Factor 7: Compatibility of proposed urban development with nearby agricultural activities. The record shall include an analysis of the potential impact on nearby agricultural activities including the following:

(i) A description of the number, location and types of agricultural activities occurring within one mile of the subject site;

Please see page 38 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

(ii) An analysis of the potential impacts, if any, on nearby agricultural activities taking place on lands designated for agricultural use in the applicable adopted county or city comprehensive plan, and mitigation efforts, if any impacts are identified. Impacts to be considered shall include consideration of land and water resources, which may be critical to agricultural activities, consideration of the impact on the farming practices of urbanization of the subject land, as well as the impact on the local agricultural economy.

Please see page 43 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

Requirements pertaining to Metro Code Section 3.01.020 (c), (d), and (e); and Metro Code Section 3.01.012 (e) are addressed in the Staff Report.

Please see page 45 of Metro's November 24, 1998 staff report on urban reserves #39 and #41 (Resolution No. 98-2729A) for an evaluation of this criterion.

SECTION III: SUMMARY OF STAFF REPORT CONCLUSIONS

The submissions received to date, as well as the information provided in the November 24, 1998 staff report, indicate that the criteria above have been satisfied.

I:\gm\long_range_planning\staff\3941StaffRepUpdate.doc

ATTACHMENT 1 Staff Report for Ord 99-834 Pagel of 2

October 13, 1999

Mr. Rod Monroe
Presiding Officer
Metro Council
600 NE Grand Ave.

Portland, OR 97232



30000 SW Town Center Loop E Wilsonville, Oregon 97070 (503) 682-1011 (503) 682-1015 Fax (503) 682-0843 TDD

Dear Mr. Monroe and Metro Councilors:

The City of Wilsonville continues to maintain its commitment to the completion of long range plans for all six of the Urban Reserve areas adjoining our City. We intend to plan for, and help to assist with, the eventual urbanization of all six of those areas in the coming years.

At the present time, our primary focus is on two of those areas. We are requesting that the Urban Growth Boundary be expanded to include Urban Reserve Area 39 and the southern portion of Area 41 (south of Tooze Road) as soon as possible.

Area 39 is a 20-acre site that is being acquired by the West Linn – Wilsonville School District for the construction of a new school. The site is currently held in trust for the Common School Fund by the Division of State Lands. The School District has already received voter approval for this acquisition and has prepared a master plan for the development of the site.

The southern portion of Area 41 includes the private properties that surround the former Dammasch State Hospital. A master plan was prepared for the development of that area three years ago (*The Dammasch Area Transportation-Efficient Land Use Plan*). Of the 520 acres covered by that master plan, approximately half are outside the current City limits, in the area that we are seeking to have added to the UGB. The Dammasch Plan includes 2300 housing units at a wide range of densities, four neighborhood parks, 100 acres of open space (mostly wetlands), a public school site, and a core commercial area. Recent action by the State Legislature requires that the State-owned portion be sold for development, subject to the City's master plan. A copy of the land use map from the Dammasch Plan has been attached for your review.

The City of Wilsonville has been through an interesting last few years, as we have successfully defended the Dammasch area against the development of a State prison that would have made it impossible to implement the Dammasch Plan; we have simultaneously had to find a new water source to meet the community's growing needs. The result has been a delay in completing some other important planning projects. As some of you will recall, the City has continued to advocate for the

ATTACHMENT 1 Staff Report for Ord 99-834 Page 2 of 2

inclusion of these Urban Reserve Areas within the UGB while we have dealt with these other issues as well.

Thank you for your continued support. We would not have been so successful in our recent efforts, if not for Metro's efforts on our behalf.

If you have any questions about this information, or other aspects of the City planning program, please contact me.

Sincerely,

Stephan Lashbrook, AICP

Att A Vient

Planning Director

CC: Mayor Lehan and City Council

Planning Commission

Arlene Loble, City Manager

Eldon Johansen, Community Development Director Elaine Wilkerson, Metro Growth Management

November 18, 1999

Attn: Metro Council

RE: UGB expansion in UR 39

Please accept this as written support to the testimony provided today at your hearing on this matter.

From: Mike Gates, Chairman, West Linn-Wilsonville School Board

The inclusion of parcel #39 is crucial to the educational needs of our school district. We support it as one on the center pieces of our own Long Range Facilities Plan.

Existing primary schools in Wilsonville are already over capacity, with the needs growing every day for more classrooms and adjacent facilities. To meet these explosive growth we hope to begin construction this summer on a new structure.

Voters have already expressed their support by passage of a bond measure to fund the construction of the needed school.

The last piece missing is to bring the former State owned parcel inside the UGB. The county is not structured to provide the basic services required, but the City of Wilsonville, recognizing the impending construction has already begun steps to help speed the process, upon your approval.

Those steps include annexation and comprehensive plan amendments to change zoning. Neither process can be completed until the land is inside the UGB.

The key issue is livability. Without the site, existing school facilities will continue to be inadequate to serve current and expected growth within the current UGB.

Our District has implemented several interim alternatives, including modular units, modified shifts for staff development, and many restrictions in curriculum due to lack of space. All these alternatives are inferior to building a new school.

On behalf of the more than 7,000 students in our District, we heartily urge the bringing of UR 39 inside the UGB.

Thank you for your time and consideration.

Mike Gates



30000 SW Town Center Loop E Wilsonville, Oregon 97070 (503) 682-1011 (503) 682-1015 Fax (503) 682-0843 TDD

November 18, 1999

Mr. Rod Monroe Metro Presiding Officer 600 NE Grand Ave. Portland, OR 97232

Dear Mr. Monroe and members of the Metro Council:

I am writing to provide input on two related matters that are currently before the Metro Council for consideration. The first concerns the issue of sub-regional consideration of jobs/housing balance. The second concerns the addition of Urban Reserve Area 39 and the southern portion of Urban Reserve Area 41 to the regional Urban Growth Boundary.

Before dealing with those issues, let me provide as background the fact that, according to information received from Metro, Wilsonville had 17,013 jobs and only 5,329 housing units in 1996 (3.19 jobs/housing unit). We have added more housing units than jobs since 1996. Still, Wilsonville continues to have an extremely high ratio of jobs to housing units. This sort of imbalance is quite unprecedented.

Wilsonville has a Town Center, but no Regional Center according to Metro's standards. We have been told that calculating jobs/housing balance on a strictly regional basis means that Wilsonville is lumped in with the Washington Square area, and everything in between. I respectfully submit that this makes no sense at all and is counter-productive to sound regional planning.

Washington Square is some twelve miles from Wilsonville's center, with the connecting traffic corridors between Wilsonville and Washington Square (Interstate-5 and Highway 217) among the most congested in the region. Aggregating Wilsonville and Washington Square together for jobs/housing calculations is the same as saying that it is a good thing to encourage people living around Washington Square to commute to Wilsonville for jobs. In fact, that is the last thing that the region needs at this point. If Metro fails to take a sub-regional view of jobs/housing, you will be encouraging the kinds of land use and transportation patterns that we are all trying to prevent.



Wilsonville has relatively little developable residential land within the City limits and we do not yet have any UGB land outside the City. Because most of Wilsonville was built within the last twenty years, we do not have much potential for redevelopment in the near future. This means that we must look to residential development in the Urban Reserves to meet our growth needs and improve our jobs/housing balance.

By including the southern portion of Urban Reserve Area 41 in the Urban Growth Boundary, you will be helping to make the planned Dammasch urban village a reality. The 2,300 housing units planned for that area will be within one mile of thousands of Wilsonville's current job sites.

Another important consideration in evaluating the Dammasch area is the fact that the former hospital itself will be very difficult, if not impossible, to develop to urban housing densities without also including the remainder of the master planned area within the UGB. I am aware that Metro's staff has summarized the potential productivity of the southern portion of Urban Reserve Area 41 by concluding that it would add 1,277 housing units. A cursory observation might lead one to that conclusion, assuming that the site of the former hospital itself could be redeveloped without urbanizing the surrounding land. In fact, there is no efficient way of providing urban services to the old hospital site without including the surrounding properties. From our perspective, the development of this area will either lead to the 2,300 housing units of the Dammasch master plan, or will result in very little housing development at all.

Urban Reserve Area 39 is only twenty acres in size. While small by urban reserve standards, it is an unusual commodity. Wilsonville does not have any other vacant parcels of this size within easy access of residential neighborhoods. This property is held in trust for the Common School Fund. The only urban use that can be made of Urban Reserve Area 39 is as a public school.

Another unique characteristic of Urban Reserve Area 39 is that it adjoins an existing school. This provides an opportunity for increased efficiency because the adjoining schools can share a parking lot and other facilities.

The City of Wilsonville continues to plan for the urban development of all six of the urban reserve areas adjoining our City. We are most interested in the inclusion of the two Urban Reserves mentioned above in the UGB at this time because these are areas where master plans for development have already been completed. A great deal of community involvement and hard work have already gone into the development of both of these sites and we hope to see that work come to fruition in the near future.

To summarize, the City of Wilsonville seeks the immediate inclusion of Urban Reserve Area 39, and the southern portion of Area 41, to the Urban Growth Boundary as soon as possible because:

- * The City of Wilsonville has an unprecedented jobs to housing imbalance, historically exceeding 3 jobs per housing unit;
- * There is a need and justification to consider Wilsonville's jobs/housing imbalance from a sub-regional perspective. To do otherwise will assure that the jobs/housing situation, and the traffic congestion that results, will worsen over time;
- * The City is ready to move forward with the annexation and urban development of these areas immediately after Metro adds them to the Urban Growth Boundary;
- * The City needs to be able to implement the Dammasch master plan portion of Urban Reserve Area 41 in order to provide a significant new housing area. Without it, the Dammasch property that is already within the City limits will not be able to be redeveloped to provide much in the way of needed housing.

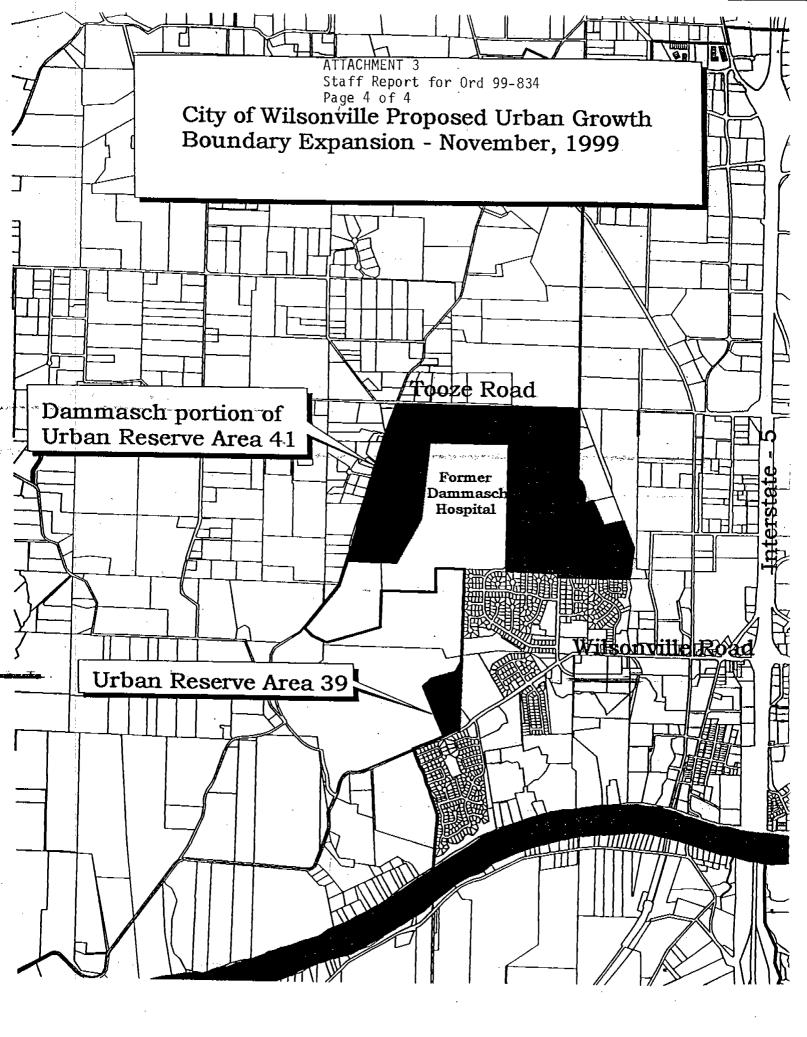
Our staff will be glad to work with yours to provide additional information to help prepare your record for this decision. We appreciate your continued support.

Sincerely,

Charlotte Lehan

Mayor

CC: Metro Councilors



Proposed Urban Growth Boundary Expansion Staff Report November 24, 1998

Urban Reserve Areas 39, 41 and 42 (Wilsonville Area)



Growth Management Services Department 600 N.E. Grand Avenue Portland, OR 97232 503/797-1839