




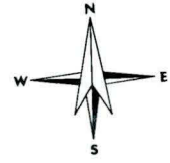


Open Spaces, Parks & Streams

Willamette Narrows

-  Subject Property
-  Nature Conservancy
-  Metro Acquisitions
-  State of Oregon
-  Clackamas County

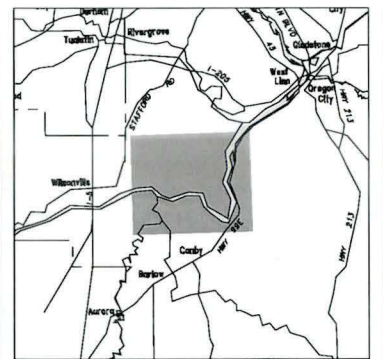


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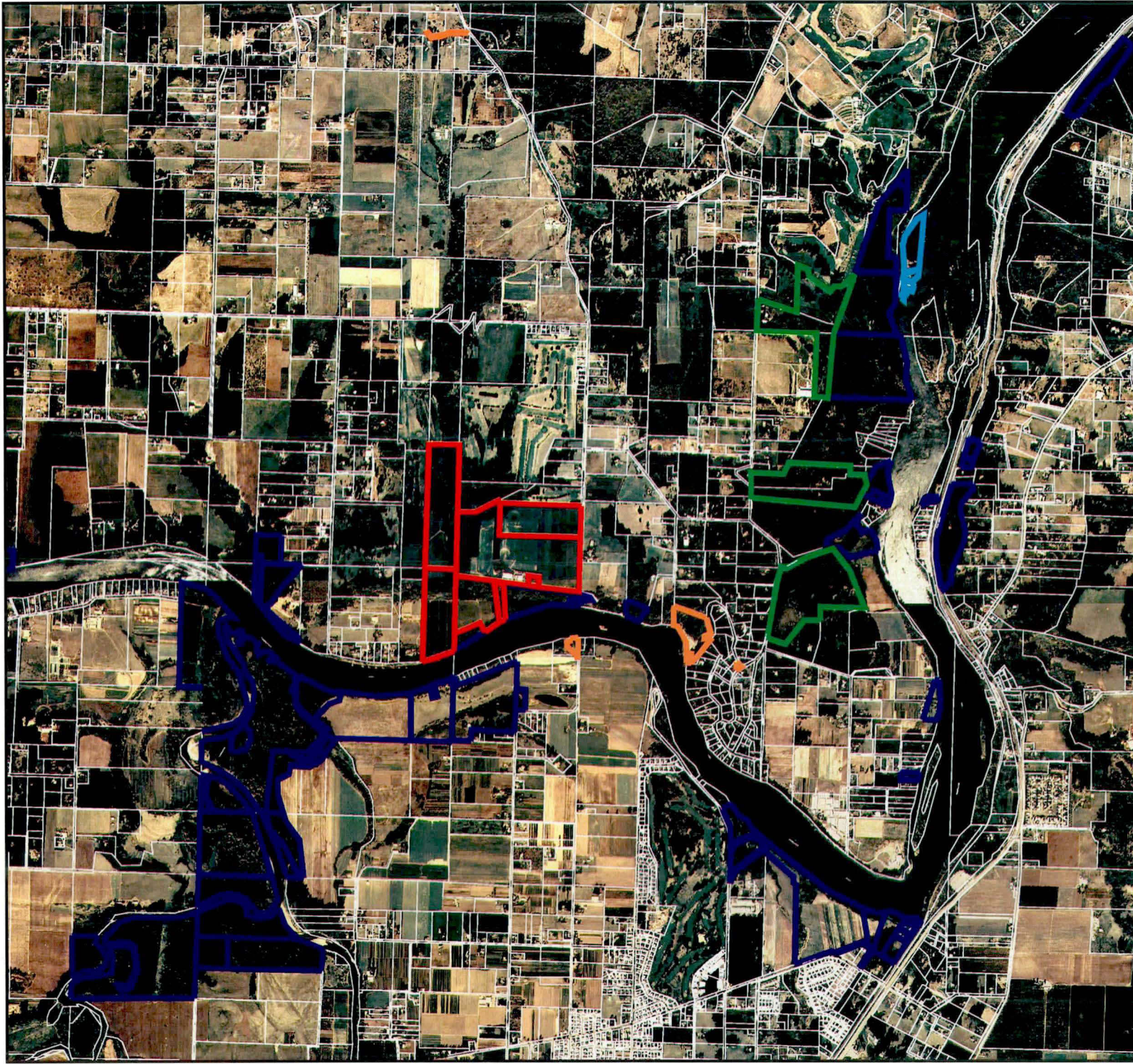


METRO

600 NE Grand Ave.
Portland, OR 97232-2736
Voice 503 797-1742
FAX 503 797-1909
Email drc@metrodst.or.us



Location map





061099c-01



WASHINGTON
COUNTY,
OREGON

June 10, 1999

Mr. Rod Monroe, *District 6*
Presiding Officer
Metro
600 NE Grand Avenue
Portland, OR 97232-2736

Dear Presiding Officer Monroe:

Please enter this correspondence into your record regarding the Metro Council consideration of an ordinance dealing with Urban Reserve Area 55.

As you may be aware, Washington County has initiated an analysis of transportation issues and facilities in the general area of Urban Reserve 55. Unfortunately, the transportation analysis is not complete. We expect the transportation analysis to be complete and finalized in approximately three weeks. Upon completion, Washington County will disseminate the study to interested parties and would be available to discuss the analysis and conclusions with interested parties.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Cameron", with a long horizontal line extending to the right.

Charles Cameron
County Administrator

cc: Steve Larrance
Larry Derr
Larry Shaw


061099c-02

LAW OFFICES OF
JOSSELYN, POTTER & ROBERTS
53 S.W. YAMHILL STREET
PORTLAND, OREGON 97204
TELEPHONE (503) 228-1455
FACSIMILE (503) 228-0171

June 10, 1999

RECEIVED

JUN 10 1999

COUNCIL 
~~EXECUTIVE OFFICER~~

Metro Council
Metro
600 NE Grand Avenue
Portland, OR 97232-2736

Re: Ordinance No. 99-809

Dear Council Members:

This letter is submitted on behalf of Citizens Against Irresponsible Growth, a nonprofit corporation formed to represent citizens, property owners and businesses who will be adversely impacted by irresponsible planning and development of the Hillsboro South Urban Reserve Area, and Steve Larrance, Walter Hellman and Rick VanBeveren, individuals who own property and live or operate businesses in the area that is adversely affected by the proposed Metro action.

Please include this letter, its attachments and the documents adopted by reference below in the record of Ordinance No. 99-809.

The following documents are attached:

1. Memorandum from Richard Benner to Land Conservation and Development Commission regarding work session on Metro Regional Framework Plan dated June 2, 1999.
2. City of Hillsboro Transportation System Plan, Draft, dated December, 1998.
3. Memorandum from Steve Larrance to Andy Back and Randy McCourt regarding transportation analysis dated April 8, 1999.
4. Memorandum from CAIG and Steve Larrance to Hillsboro Planning Commission regarding its consideration of the draft Transportation System Plan, dated May 12, 1999 and attached April 6, 1999 Tom Kloster memorandum.
5. Memorandum from Carl Springer to Andy Back regarding Recommended Metro 2020 Model Assumptions dated June 10, 1999.

6. Document titled Regional Transportation Plan Adoption Timeline, May, '99.
7. Document titled Appendix B, Access Management Policy, 1991 Oregon Highway Plan.
8. Document titled Goal 3: Access Management, 1998 Oregon Highway Plan.
9. Memorandum from Meg Fernekees to Patrick Ribella regarding draft urban reserve plan for Area #55 dated March 9, 1999.
10. Memorandum from Steve Larrance and CAIG to Metro Council regarding request for inclusion in record, dated June 10, 1999 with accompanying documents.
11. Memorandum from Steve Larrance to Larry Derr regarding descriptions of Metro Plan for TV Highway dated June 10, 1999.
12. Memorandum from Steve Larrance to Larry Derr regarding Hillsboro schedule of Concept Plan adoption dated June 10, 1999.
13. Memorandum from Steve Larrance to Bruce Warner regarding meeting notes, dated April 20, 1999.
14. Memorandum from Walt Hellman regarding Metro TV Highway Plan dated June 6, 1999.
15. Memorandum from Tom Lancaster to Steve Larrance regarding Hillsboro South Urban Reserve Concept Plan dated April 6, 1999.
16. Letter from Tom Lancaster to Larry Derr dated June 10, 1999.

We request that the following documents and testimony in the possession of Metro be deemed a part of the record of this ordinance:

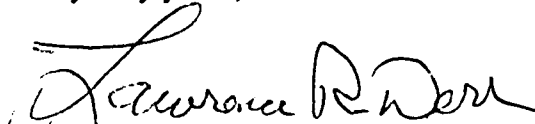
1. The entire record leading to the adoption of Ordinance No. 98-788C and Resolution No. 98-2728C. The Ordinance and Resolution relate to amendment and proposed amendment of the urban growth boundary to add Urban Reserve Areas 51, 52, 53, 54, and 55. Because the matters were heard together in one series of hearings, it is not possible to know in advance what material Metro may deem applicable to one or the other matter, and many items will relate to both matters.
2. Metro Code, Chapters 3.01 and 3.07 and exhibits, including without limitation the "Required Street Design Map" and the "Required Motor Vehicle System Map".

June 10, 1999

Page 3

3. The Metro Regional Framework Plan dated December 11, 1997 including appendices and its adopting ordinance.
4. The Metro 2040 Plan map.
5. The Metro RTP "Existing Resource Map".
6. The July 1995 Interim Federal Regional Transportation Plan.
7. The July 25, 1996 Regional Transportation Plan Update, Regional Transportation Policy.
8. The July 16, 1997 (revised December 9, 1997) Draft Alternatives Analysis Findings, Briefing Materials for JPACT, MPAC and the Metro Transportation Planning committee.
9. The 1992 Revision of the 1989 Update, Regional Transportation Plan and adopting Ordinance No. 92-433, dated January 23, 1992. This is the adopted RTP controlling regional land use decisions that is proposed to be updated this year.
10. The 1999 Urban Growth Report Work Program, first run of need numbers, presented to the Growth Management Committee June 1, 1999.
11. Memorandum from Tom Kloster to Larry Shaw regarding RTP Strategy for TV Highway dated May 10, 1999.
12. Adopted City of Hillsboro Transportation System Plan, if any, or current transportation element of the Hillsboro Comprehensive Plan.
13. Adopted Washington County Transportation System Plan, if any, or current transportation element of the Washington County Comprehensive Plan.

Very truly yours,


Lawrence R. Derr

Enclosures

Date: 6-10-99
To: Larry Derr
From: Steve Larrance
Re: Descriptions of Metro plan for T.V. Hiway

Larry,

This is my first hand report, based on my notes, of Tom Kloster's oral presentations detailing the recent plans Metro has for T.V. Hiway.

On Jan. 21, 1999 Mr. Kloster made a presentation to the Hillsboro City Planning Commission. A portion of that presentation spoke to the T.V. Hiway. The Planning Commission's was also around that time having hearings about the proposals to expand the Urban Growth Boundary in the South Hillsboro area. They expressed concerns to their staff and to Mr. Kloster about the Concept Plan's Kittelson Transportation Report relying upon the creation of new parallel arterials to T.V. Hiway to absorb the overflow traffic as T.V. Hiway would be pushed beyond capacity by the expansion traffic. Their concern was that the new east/west arterials would connect off-site to existing local collectors and divide those existing neighborhoods.

Mr. Kloster told them not to fear that the parallel arterials through the existing neighborhoods would not be necessary because Metro had a better idea. Since the county plan called for a seven lane T.V. Hiway to handle the increased load due to some expansion that the 2020 modeling assumes they had modeled that configuration. But it had not worked either. He said what did appear to show some improvement in capacity was a limited access roadway between Brookwood Ave. and Murray Blvd.. That roadway would have no private access points (driveways into businesses) and no at-grade intersections. There would be 3 or 4 raised interchanges with access to the hiway in both direction and 4 or 5 overpasses with no hiway access and a few right-in/right-out at some existing intersections. All the remaining roads now accessing T.V. Hiway would be closed off. In other words that is the configuration necessary to create the potential capacity on T.V. Hiway for the growth.

On May 26, 1999 Mr. Kloster again made a presentation to a local group, the Hillsboro Chamber of Commerce Land Use and Transportation Committee. His description of the proposed "improvement" to T.V. Hiway was similar except for one major change. This time the plan contained an unspecified number of at-grade intersections. As you are aware, at-grade intersections would greatly reduce the through carrying capacity of the this facility.

The question is which plan was modeled to show that sufficient capacity could be created to service the growth? And another question might be what is the probability that any plan which includes no access to businesses and "no at-grade" intersections where they have existed for over fifty years being built.

Date: 4-20-99
To: Bruce Warner, Metro COO
From: Steve Larrance
Subject: Notes from discussion with Bruce Warner, Metro COO
Larrance critique of Metro Transportation Staff Report, S. Hillsboro URAs
Note: Bruce, I've tried to add back the meat to the outline we derived from our meeting on 4-20. Thanks for your assistance in developing solutions.

1. Is URA "serviceable"? As a threshold question this was not addressed. Metro must examine regional system to determine areas where both transportation capacity can be most effectively and efficiently created while impacts to good dirt is minimized. Of all urban services transportation costs are higher than most all other services combined and good dirt is the only attribute that can't be created.

A. Transportation planning inadequate?

- 1) Why is this URA "best" or "feasible"?
Where might impacts be "least" or "cheapest"?
- 2) On-site system as proposed in Concept Plan
 - a. Accurate cost estimates? Metro staff cost is 50% below even the developer/Hillsboro low-ball figures.
 - b. Is there potential to add-on more urban area in future? No.
- 3) Off-site system as proposed in Concept Plan
 - a. In Metro staff report criteria, off-site mitigation is not anticipated, discuss or costed at all except to connect to two closest collector or arterial streets.
 - b. Not all proposed URAs (and certainly not all exception areas) are equal in the off-site costs to serve (that is, integrate into the regional system) with transportation facilities. So why not an estimate of off-site "costs to serve" as part of any report purporting to rate costs associated with urbanization of each URA and dwelling unit to be added?
 - c. Staff report states \$2,300/D.U. costs for all S. Hillsboro URAs, which causes them to be ranked very near the cheapest to serve. With none of the expensive off-site transportation mitigation included this is very inaccurate info to give to the Council.

B. Therefore, the productivity analysis is wrong.

2. Metro Staff report did not evaluate, even in relation to other URAs, the potential for a URA to create urban generated vehicle trips which will use the rural road network to access likely employment sites or other established transportation routes, such as, routes to interstate freeways etc. The S. Hillsboro URAs have a very large potential to attract new residents who work in Tigard, Tualatin and Sherwood and other south areas and would use rural roads to access daily. The Concept Plan deceptively represents the opposite. By comparison a new

urban area adjacent to Hwy. 26 for example would tend to "lead" trips onto the urban regional road system.

3. The "Needs Assessment" is not yet complete. The existing assessment is very inaccurate in that building permits issued were the basis. Only built and occupied dwellings should be counted as "used space". In addition areas that are designated for other than residential uses need to be reevaluated to determine if their conversion to residential might best fulfill an areas' need to balance jobs and housing. And certainly, a city making a request for more housing to "balance jobs" should not in the same breath be asking for substantial additions of rural land for industrial uses as Hillsboro is now doing. The land they are asking to industrialize through a future UGB amendment , between Evergreen Road and Hwy. 26, is also the best land to convert to urban housing. Cheapest transportation costs on and off-site, adjacent to jobs base so it would attract mostly residents working nearby not generate rural trips south and would use exception lands and surrounded EFU land of lesser quality soils.

4. The Metro staff report apparently accepted the Concept Plan's contention that fully 50% of the employment trips generated in the P.M. peak by the S. Hillsboro URAs would be driving only north to the proposed jobs area near Evergreen Road in the north of the city. This is not true for job trips in the existing urban areas adjacent to the URAs. In addition without new arterial roads , built through dense residential areas between the south and north areas and crossing two large creek systems, the envisioned routes for these trips is not possible.

5. The Metro staff report also accepts the outrageous assumption that fully 30% of the peak hours trips will not utilize an auto. This assumption has no basis in fact. It would be hard to reach this conclusion even if this area had access via a mass transit system which could whisk riders magically over the traffic jams, which include the buses, on the purposefully undersized streets below. It makes the exercise of assigning trips to a system you don't want to participate in correctly sizing and constructing very much easier if you are allowed to forget a third of those trips. What is a staff report supposed to do if not disallow this kind of deception and advise their decision makers of it?

6. An examination of the implications of "dumbing down" the minimum level of transportation service (two hours of E and F) by Metro to facilitate 2040 Plan policies should have been a portion of the transportation report for these UGB amendments. Especially in a portion of our region where such levels already exists and where, partially because of past regional decisions to purposefully "under serve", solutions can not even be reached through full implementation of the unfunded RTP projects list. In an expansion proposal of such magnitude as the S. Hillsboro URA, or indeed even just West 55 where all east/west trips go onto already minimum service level T.V. Hiway, the institutionalized acceptance of multiple hours of even more congestion many miles from a freeway or light rail station would definitely help your decision makers visualize the enormity of their decision.

The staff report should also point out to the Council that these E and F

congestion levels presently exist in this portion of the region where policies such as Traffic Impact Fee have long been the rule and where enough credibility exists between the electorate and the county policy makers so that programs such as Major Streets and Transportation Improvements tax proposals have passed. And now a permanent funding mechanism is in place for at least some on-going new construction of roads. A regional staff report could point out that expanding the boundary in such an area by ignoring existing problems is no way to reward that portion of the region which is successfully communicating with citizens to address congestion. Regional policies need to build on local successes not punish responsible behavior.

7. In their report, Metro staff supported the Concept Plan's off-site mitigation package which included a system of E/W arterials, created from the only existing local collectors, to avoid showing trips added to the already congested T.V. Hiway adjacent to the URA. This parallel system doesn't avoid congestion. It simply spends tens of millions of unfunded dollars and destroys existing residential neighborhoods to move the congestion farther from the URA where the arterials dump the traffic back onto T.V. Hiway in areas of existing and unsolvable congestion. Also the Concept Plan doesn't propose that the URA will pay for the parallel system either, only rely on it as a "on paper only" assumption so that the UGB expansion can move forward. The URA is the only beneficiary of the parallel system yet they see no need to guarantee on-site funding for any part of it.

So there is written Metro support of the parallel system, but at the same time Metro staff is on the record telling Hillsboro Planning Commission in late '98 that a better solution would be an all new T.V. Hiway with totally limited access, except for a very few major intersections, and with three lanes in each direction between Brookwood Avenue on the west to Murray Blvd. on the east. It was mentioned that the functional classification should be changed to reflect the fact that the hiway would only have through capacity between the two previously mentioned intersections and that on either end it would have total access and an average speed of not much more than 5 MPH. This plan even shows up on the RTP projects list in Nov. '98 as part of a bigger \$33 million project. This is even a more far fetched plan. Access management to driveways was very successfully implemented by Wa.Co. on that portion of T.V. Hiway between 170th and 209th Avenue in 1985 as you recall. That turnip can only be squeezed so much. And totally limiting access is an outrageous proposal. How would people access the goods and services that this mixed use commercial-office-industrial-residential area provides? As you know the block north of the hiway is truly a 2040 type use. And I'm sure INTEL would have a word or two to say about prohibiting access to their huge facility in the middle of the limited access area. The public needs to know more about this drastic shift in functional classification and use to our already over burdened main artery.

To complicate this issue even more there may be an even newer Metro proposal that I'm yet to hear in person. There are hints of it in the dialog between Metro and Hillsboro regarding the city's Draft Transportation System Plan now in the final adoption process. What ever the different proposals for T.V. Hiway might be, they need to be in written form, distributed to the public and the community needs to participate in the decision for it to be successful.

from Walt Hellman, 6/6/99

re: Metro TV Highway plan

1. Land use planning in Oregon legally requires that before new areas are brought into the UGB and developed, it must be demonstrated that adequate infrastructure support, including transportation, can be provided.
2. In the case of TV Highway, Metro has specified very large and extremely costly changes which would be required to meet increased load needs from development including areas south of TV Highway. No reasonable and informed person would agree to the likelihood that such a plan will be realized and put into service. A plan to meet capacity needs could include helicopter shuttles but obviously such a plan would not be feasible. An infrastructure plan must not only meet the capacity needs, but be reasonably feasible to implement. The Metro plan for TV Highway does not meet this condition.
3. The City of Hillsboro has shown that it is completely disregarding the supposed TV Highway capacity plan by approving substantial new driveway access when the plan's goal is to remove all driveway access. This new access includes a new Reserve Mall almost directly opposite the proposed inclusion areas.
4. No one, including the City of Hillsboro, is taking the totally unrealistic Metro limited access plan seriously. Public agencies and representatives have a legal responsibility to act in good faith on plans which are feasible, serious and well founded. The Metro infrastructure plans for TV Highway clearly do not meet these conditions and should be struck down as providing a basis for approving substantial development south of TV Highway.



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Studies • Planning • Safety

MEMORANDUM

TO: Steve Larrance

FROM: Tom R. Lancaster 

DATE: April 6, 1999

SUBJECT: Hillsboro South Urban Reserve Concept Plan

As you requested, I have reviewed the Kittelson & Associates transportation report dated October 29, 1998. Following are some comments and questions:

General Comment: Kittelson concludes that due to physical and other constraints, TV Highway and other facilities in the site vicinity should meet the Acceptable Operating Standard rather than the higher Preferred Operating Standard for level of service. If the AOS is not met, then the facility is in complete failure. For this reason, it is important that the levels of service be carefully evaluated so that there is some assurance that the AOS will be met.

1. References are made (p. 1, 12) to an improvement of Davis Road that is "essential" to provide an east-west alternative to TV Highway. The corridor for this facility should be more clearly defined. Kittelson assumes that 250 PM peak-direction peak-hour trips would divert from TV Highway to Davis, but this needs to be tested in a model with specific assumptions for the alignment and configuration of Davis.

2. Kittelson tests only links, not intersections (p. 12), with the assumption that the intersections can be improved to match the link capacities. This assumption needs to be tested. If there are physical and other constraints to widening of TV Highway, these same constraints might also apply to the need for multiple turn lanes on intersection approaches.

Steve Larrance
April 6, 1999
Page 2

3. An assumption is made that access control measures will increase the capacity of TV Highway (p. 14, 20). This needs to be quantified.
4. It is assumed that improvements to Farmington and Kinnamon Roads will further divert east-west traffic from TV Highway. Were these improvements in the model that was used to project 2015 volumes?
5. Figure 4 shows 350 westbound and 225 eastbound trips from the site added to TV Highway east of 185th. Figure 5 shows 3140 westbound trips without the site, and 3240 trips with the site, an increase of 100 trips. Eastbound, there are 2370 without the site and 2395 with the site, an increase of 25. It is not clear why there is a discrepancy in the volumes added by the site.
6. The largest impact to TV Highway is between 209th and 185th, which will experience an increase of 550 westbound and 360 eastbound PM peak trips. Kittelson does not show the projected 2015 volumes without the site and the total of 2015 plus the site for this link, and does not show a V/C ratio for this link. Kittelson says five lanes on this link would be adequate, but it is not clearly documented.
7. Kittelson assumes that 30 percent of the site-generated trips will be internal trips or alternative modes. Is this consistent with previous Metro assumptions for large mixed-use areas, such as Tanasbourne?
8. If only the Tier One portion of the site is developed, there will be no roads parallel to TV Highway east of 229th Avenue. This scenario should be tested for its impact on TV Highway.



June 10, 1999

Lawrence Derr
Josselson, Potter & Roberts
53 S. W. Yamhill Street
Portland, Oregon 97204

Dear Mr. Derr:

As you requested, I have reviewed the background material related to transportation planning for the proposed West 55 portion of the South Urban Reserve area of Hillsboro. Included in my review were the following documents:

- the Hillsboro Transportation System Plan draft by DKS dated December, 1998,
- the Transportation Report for the Hillsboro South Urban Reserve Concept Plan by Kittelson & Associates dated October 29, 1998,
- a memo from Michael Hoglund to Carol Krigger dated November 22, 1998,
- a letter from Leo Huff of ODOT to Jon Kvistad dated December 3, 1998,
- a memo from Tom Kloster to Andy Back dated April 6, 1999,
- a memo from Tom Kloster to Larry Shaw dated May 10, 1999, and
- a memo from Carl Springer of DKS to Andy Back of Washington County dated May 3, 1999, regarding the recommended Metro 2020 assumptions for the DKS transportation review for Washington County of the South Hillsboro Concept Plan Area.

As noted in the November 22 Hoglund memo, a conceptual transportation plan must be prepared for all major amendments to the UGB. The October 29 Kittelson report was intended to serve as the conceptual plan for the South Urban Reserve area, but there are some major aspects of the plan that do not appear to be complete or documented.

One concern is that the November 22 Hoglund memo only reviews the Kittelson report as a concept plan and does not present any additional information. The Kittelson report states that the draft Hillsboro Transportation Plan concludes that with access management, TV Highway will be adequate without adding lanes. It should be noted that this Plan conclusion applies only to 2015, that the Plan reports that widening of TV Highway will be required by 2020, and that the Plan assumes no new development



Lawrence Derr

June 10, 1999

Page 2

south of TV Highway. In addition, ODOT reports that forecasts of 20-year volumes indicates that TV Highway will be over capacity, even with the new LOS standards proposed by Metro, without including any trips from development south of TV Highway.

The May 10 Kloster memo states that the Hogle memo discusses the adequacy of the West 55 concept plan, but a review of the Hogle memo does not show any mention of the West 55 plan specifically. The Kittelson report includes the impact of West 55, but an addendum to the Kittelson report states that without development of the eastern portion of 55 and its associated new roadway system, it will be necessary for the generated trips from West 55 to use TV Highway. The Kittelson report assumes the presence of the eastern 55 roadways to handle traffic from West 55. Without the additional roadways and with the resulting additional traffic to TV Highway, it is apparent that there will be capacity concerns on TV Highway.

It is mentioned in several of the reviewed sources that there is considerable uncertainty regarding needed improvements to TV Highway. Part of the uncertainty is related to the projected traffic volumes, and part of the uncertainty is related to the effectiveness of various improvement strategies that have been proposed, such as access control, parallel roadways, overpasses, and partial interchanges. The general conclusion stated in several places is that a corridor study of TV Highway is needed to resolve these uncertainties. Without the corridor study, it is not possible to reasonably draw a conclusion regarding the capability of TV Highway to adequately handle traffic from West 55 or the entire South Urban Reserve.

The Kittelson report stated that in their opinion 30 percent of the trips generated by the South Reserve Area would be either by alternative modes or would be internalized to the development, but there is no data or measurement of similar sites cited in the report to justify that assumption. Further, DKS, in its preliminary work on the transportation analysis for this area for Washington County, has found that a trip reduction of no more than 12 percent can be justified base on information available to them.

In summary, I have not found a complete, documented analysis which demonstrates that TV Highway will be adequate for development of the South Urban Reserve or of the West 55 area through the design year of 2020 with the improvements that are currently planned and approved in the Regional Transportation Plan for TV Highway. An informed judgment on the adequacy of TV Highway, and on the required mitiga-



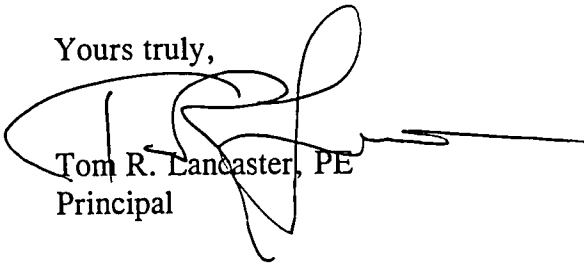
LANCASTER ENGINEERING

Lawrence Derr
June 10, 1999
Page 3

tions if TV Highway will be inadequate, must await completion and review of the DKS transportation analysis which is presently underway.

If you have any questions regarding these comments, please let me know.

Yours truly,



Tom R. Lancaster, PE
Principal

Date: 6-10-99
To: Larry Derr
From: Steve Larrance
Re: Hillsboro schedule of Concept Plan adoption

Yesterday afternoon I did talk to Mr. Wink Brooks, the city of Hillsboro's Planning Director, concerning the dates for discussion and probable vote on the West 55 portion of the South Hillsboro UGB expansion proposal by both the city Planning Commission and the City Council. They are as follows:

Planning Commission


June 17th at 7 pm: work session on the West 55 area Concept Plan
June 23rd at 7 pm: hearing on the West 55 Concept Plan and probable vote
an agenda will be available on June 18th

City Council

July 6th at 7 pm: work session of the West 55 Concept Plan
July 20th at 7pm: council votes on West 55 Concept Plan

Date: 6-10-99

To: Metro Council
600 NE Grand Avenue
Portland, Oregon 97232 2736

From: Steve Larrance 
CAIG Citizens Against Irresponsible Growth
20660 SW Kinnaman Road
Aloha, Oregon 97007

Re: Request inclusion into the official record for:
Ordinance No. 99-809 (formerly Ord. 98-788C)
the western portion of URA 55

The following contains new information and my previous submission on the Ord. 98-788C with some changes.

Date: 12-1-98

To: Metro Council
600 NE Grand Avenue
Portland, Oregon 97232 2736

From: Steve Larrance
CPO #6 Aloha, Reedville and Cooper Mt.
Rep. to Hillsboro South URA Task Force
20660 SW Kinnaman Rd.
Aloha, Or. 97007



Re: Request inclusion into the official record for:
Ordinance No. 98-788A west portion of Site 55
Resolution No. 98-2728A the remainder of Site 55, and all of 53 and 54
as stated in the Metro Council agenda of 12-3-1998

The purpose of the following is to set forth our legal record of the public process and pertinent facts regarding the proposed inclusion within the Regional Urban Growth Boundary of all or parts of approximately 1600 acres known as Urban Reserve Area sites 51 through 55 south of the Tualatin Valley Highway and west of 209th Avenue in Washington County Oregon.

PLANNING AGREEMENT

On January 29, 1998 the planning directors for the city of Hillsboro and Washington County signed a Memorandum of Understanding Re: Preparation of Urban Reserve Plans for the above mentioned rural properties. I have attached a copy of that agreement. Among other purposes this document set forth the process for City-County planning coordination during the plan preparation and identified certain subject matter to be addressed by the urban reserves plans. It goes on to state that a single urban reserve plan may cover sites 51 through 55 "because these sites share common transportation, public utility, schools, sewer and water supply needs and issues and may be best master-planned collectively". In addition " the proposed transportation system improvements (including recommended design standards and construction timing) for the area shall be coordinated and consistent with the design and operation of the County transportation system as prescribed in its Transportation System Plan." A cooperative process is clearly contemplated as the following indicates, "If a specific County comment will not be accommodated within the plan, the City shall explain its reasons therefore in writing prior to submittal of the urban reserve plan for review and action by the City Planning Commission and City Council. The memo states that "If Metro includes the planning areas within Urban Reserves to be included within the

Urban Growth Boundary by December 31, 1998, preparation of the urban reserve plan(s) shall be completed for submittal to Metro by September 30, 1998. It is stated that the agreement may be terminated by either party thirty (30) days after written notice of termination has been mailed to the other party. I have attached a copy.

PUBLIC PROCESS

A Task Force of interested and affected people and representatives of interested and affected groups was formed by the city of Hillsboro Planning Department. The list of members handed out at the first meeting totaled 16. I believe seven of those members were owners of property which eventually was considered for inclusion within the growth boundary. It was my understanding that members who were representing groups were to communicate with those groups. During our Task Force meetings I learned that at least some of those members were communicating with their groups as was I. Meeting procedures were at times not very formal, such as minutes were not regularly kept and standard motion and second procedures were not followed. It was also very apparent to me that the large land owners who were paying for the process were the ones who determined what types of development would occur, but not necessarily the density of that residential development. We were never provided with a map at any task force meeting which showed any land use designations for properties off of the proposal site even though I asked repeatedly for one. How could a process of mitigation of uses occur without a map of adjacent use designations?

The process also contained several public open houses. These consisted of either a description of the plan to date or the public looking at the pictures and descriptions of the plan to date and informally asking city staff or the project staff questions in private. At the first meeting a group question period turned quickly to impacts to off-site neighbors and concerns about paying for new infrastructure. There was never another group question opportunity and to my knowledge most of these types of concerns expressed that first open house were never fully and accurately addressed in the Concept Plan. Many people have expressed to me that they were made to feel at the open house that this expansion process was "a done deal". And that they were being talk "to" not "with".

HISTORICAL SIGNIFICANCE

A great many locations on sites 51 through 55 are of very important significance locally, regionally and to our state. Some of these locations are mentioned in the concept plan such as the Hagg farm stead consisting of House, barns and other farm buildings. Some of the information about this farm in the Concept Plan is inconsistent with other records.

The Ladd-Reed farm property is also mentioned in the Concept Plan. There are several historically significant former building sites, including the home, barns and creamery/cheese factory located near the Lombardy Poplar tree lined lane going south from the old Tualatin Valley Highway right-of-way just south of the railroad tracks. In addition to the poplars, other century and a quarter old trees associated with this farm are the Black Walnuts along 209th Avenue and the Buckeye or Horse Chestnuts along the north property line. These ancient living landmarks could easily be saved due to their property line locations. All of these relatively undisturbed former building sites deserve saving for a time when they can be fully studied for artifacts. I suggested that a public space might be designated for these sensitive building sites since public space designation was being given to an appropriate amount of land on sites 55 and 53 but as you can see none was designed for them.

In addition the original military road running through Washington County went west across the Ladd-Reed farm from the present day end of Kinnaman Road. I have included a historical reference to a cemetery located along that old military road. That would most likely locate the cemetery under the proposed Ladd-Reed town center. It must be located and saved.

The Concept Plan does mention the significance of the railroad and Native American sites including a burial ground on the site. Proper professional site analysis must be required for this most sacred of all Native American artifacts. Stone artifacts were routinely found along Butternut Creek up through modern times.

I have attached various references from the files of the Washington County Historical Society Museum substantiating the historical significance of these URA sites.

AFFORDABLE HOUSING

Clearly it is not an acceptable strategy to address the mandate of affordable housing by simply stating that the development of these URAs will contain different types of housing in various densities, as was done in the Concept Plan. I have attached a letter from Ethan Seltzer, a local expert on such matters, which appeared in the Oregonian.

TRANSPORTATION

There are many on-site and off-site transportation issues which are not addressed at all or in an incomplete manner in the Concept Plan Transportation element. I have attached an analysis that I performed of costs for off-site mitigation projects based on cost figures provided by Washington County Land Use and Transportation Dept. Engineering Division applied to a mitigation network indicated in part by modeling for

this URA project done by that Department's Planning Division.

The list of inaccurate or incomplete discussions or conclusions in the Concept Plan Transportation Plan element includes such topics as:

trip generation from the site especially at peak usage hours,

trip distribution on the existing and/or proposed mitigation streets,

trip timing,

transit usage and other other modes of travel,

on-site road, intersection and bridge design, size, location, costs and impacts.

on-site wetlands mitigation locations, costs & impacts due to road / bridge construction,

off-site road, intersection and bridge design, size, location, costs and impacts.

off-site wetlands mitigation locations, costs & impacts due to road / bridge construction, Tualatin Valley Highway capacity issues,

capacity issues for other existing roads such as Farmington Road,

the proposed schedule of constructing the proposed mitigation road system,

the possibility of not constructing the proposed mitigation road system,

the inconsistencies between the Hillsboro Transportation Plan and the County Plan, why the County Plan was not used as the foundation of modeling as the city/county

Planning Agreement specified and why the county representative's remarks were ignored and not responded to as the agreement describes,

why there is no discussion of the true impacts to the proposed mitigation plan that the Regional policies concerning the mandated allowable levels of congestion during peak hour (standard: 1 hr. level E and 1 hr. level F during PM peak) .

Attached is a letter from CPO#6, which is the Citizens Participation Organization for over 30,000 residents who live adjacent to this site, requesting Washington County to complete their modeling and analysis of the impacts to the existing road system which this large and dense residential development represents. Also attached is the reply which states that this analysis will be completed on an accelerated schedule as part of their Transportation Plan update. Since this analysis is not only the basis of the city/county planning agreement but also a very accurate check of the developer's hired traffic analysts work it would be wise and proper to wait for these conclusions before moving forward with inclusion of any or all of sites 51-55 within Metro's jurisdiction or within the UGB. My analysis indicates that not only is there unmitigatable impacts to the off-site community of the proposed mitigation package but it also indicates that no on-site developer Traffic Impact Fee money will remain to fund this package after the TIF creditable on-site projects are constructed. That means a \$150 to \$200 million transportation need will be created above and beyond the existing need in this already under-served area.

Also attached are modeling and notes I received from Andy Back of Washington County Planning who was their representative to the project Task Force. His work speciality is transportation modeling for the future.

I believe that the Oregon Department of Transportation has entered their concerns into the record of this proceeding regarding the levels of service currently experienced on Tualatin Valley Highway and Farmington Road, which are state facilities. They have major concerns, I was told by Leo Huff of the Portland office, about lack of capacity even without this proposed expansion. He also stated that ODOT has no plans to fund any construction projects in this area in the planned future.

ALTERNATIVE SITE

There is an alternative UGB expansion area where the costs for off-site transportation mitigation are efficient and where planned and partially funded state projects exist. That area is north along Hwy 26 and adjacent to the North Hillsboro Industrial Area where the jobs imbalance was created that enabled this UGB expansion process to begin. Yes, the city wants to save all rural north property for industrial uses, but that is unreasonable due to the extreme high costs to provide the connecting transportation links. Imagine how efficient the shuttles now provided by the major employers would be if their passengers' homes were very near. Certainly not all employed people who might live very near the north industrial base would work there. The analysis for sites 51-55 assumes 50% of the work trips from that area, over four miles to the south, would travel north. That high percentage would be much easier to justify with a UGB expansion across the street from the jobs. In addition the region will most likely not allow more industrial UGB expansion in Hillsboro until the housing imbalance is addressed. And that is not likely to occur with the decision to bring in any or all of sites 51-55 due to the long appeal process that is already occurring and the ultimate failure of those sites to prevail in the appeal process. I have included a short list of transportation projects and construction costs associated with development of this north residential area.

WEST PORTION ONLY OF SITE 55 INCLUSION IN UGB

The section of the Concept Plan which addresses the inclusion of only the first tier portion of site 55 states many times how the entire area of sites 51-55 form one UGB expansion unit to meet the orderly and efficient growth standards in Goals 2 and 14. It is not possible to change this concept stated strongly on page 151 lines 1-25 by simply adding another paragraph on that page line 29-31 which states the opposite. On page 133 that concept of sites 51-55 as a unit to meet the standards is stated on lines 1-7. And even in the introduction on page 129 to this section dealing with the first tier portion on lines 18-22 the difficulty of programming many infrastructure needs into the planning process is raised if a commitment is not made to the all of sites 51-55.

The Transportation Plan element of the Tier One Concept Plan suffers greatly from the lack of east/west connectivity when only the west portion of site 55 is modeled. Without the proposed off-site E/W alternative routes the site traffic must use TV Highway. That is stated on page 140 on lines 28-29 in the Concept Plan. The analysis is not in depth on this topic, most likely due to there not being sufficient capacity on TV Highway to allow those new trips to be shown there without illustrating how this UGB expansion violates standards. In the Transportation Element for the entire site in the appendices on page 35 and the First Tier Concept Plan on page 158 in the exact same paragraphs outline conformance with Title 6, Section 4: Transportation Performance Standards. How can this be if west site 55 functions differently without the connectivity provided through sites 51-55 as the report states.

It appears that the financial component for infrastructure costs for the first tier only expansion is tied to the fate of the entire unit of sites 51-55. At least in my copy it does not appear in the First Tier Concept Plan.

There is no justification for a UGB expansion of only the west portion of site 55 to balance the surplus of jobs in north Hillsboro over four miles away.

CONCLUSIONS

Both Ordinance No. 98-788A and Resolution No. 98-2728A must be denied because neither proposal meets the following applicable standards in the Metro Code:

Goal 2 and Metro Code 3.01.020 (c)(2)

“The proposed uses are compatible with other adjacent uses or will be so rendered through means designed to reduce adverse impacts.”

Urban Reserve Plan Metro Code 3.01.012 (c)(8)

“A conceptual transportation plan consistent with the Regional Transportation Plan and consistent with protection of natural resources as required by Metro Functional Plans.”

We are incorporating into this submission to the record by reference the following:

1. All city of Hillsboro City Council and Planning Commission agendas, written materials and the recorded audio tapes of those meetings and work sessions during which the Urban Reserve Areas were discussed up to the closing of the record of this proceeding.
2. The adopted city of Hillsboro Transportation Plan and Comprehensive Plan.
3. The Draft Hillsboro Transportation System Plan.
4. Washington County Transportation System Plan and Comprehensive Plan.
5. Metro's Regional Transportation System Plan and the RTP Project List - Round 1 dated June 23, 1998.
6. Oregon Department of Transportation comments and testimony made during 1997 and 1998 regarding the planning, feasibility, or the funding of all transportation improvements in Washington County.
7. We would like to object to Metro leaving the record open longer for the City of Hillsboro, noon on Tuesday, December 8, 1998, than it was open for the public, 5 p.m. on Monday, December 7, 1998.

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WASHINGTON COUNTY and the CITY OF HILLSBORO
Memorandum of Understanding Re: Preparation of Urban Reserve Plans
for
METRO URBAN RESERVE SITE NOS. 51, 52, 53, 54, 55, 61, 62, 63 and 64.

I. Purpose.

This Memorandum of Understanding (“Memorandum”) is between the City of Hillsboro (“City”) and Washington County (“County”), and is executed, respectively, by the Directors of the County Department of Land Use & Transportation and the Hillsboro Planning Department. It is prepared pursuant to ORS 190.010 which permits local government to enter into agreements for the performance of any or all functions and activities that a party to the agreement, its officers or agents, have authority to perform. The Memorandum addresses Metro Code, Sec. 3.01.012(e)(1) which requires an “urban reserve plan”¹ for any Metro Urban Growth Boundary (“UGB”) expansion areas. Such a plan may include a city-county planning area agreement that:

- 1) the city or county will adopt comprehensive plan provisions for such areas;
- 2) such areas will be rezoned for urban development only upon annexation, or upon agreement for delayed annexation to the city; and
- 3) before their annexation to the city, the county shall adopt rural zoning of the expansion areas to protect them from inappropriate development until city annexation and adoption of urban zoning.

The purposes of the Memorandum are to identify the roles of the City of Hillsboro and Washington County in preparing urban reserve plans for Metro Urban Reserve sites; set forth the process for City-County planning coordination during their preparation; and, identify certain subject matter to be addressed by the urban reserves plans. The Memorandum does not delegate authority or responsibility (and the attendant procedural duties) to make formal land use decisions within the covered urban reserve areas and is subject to appropriation of funds, including private funding contribution, by the City.

¹ “Urban reserve plan” means and includes urban reserves plans described in, and required under Sec. 3.01-012(e)(1-13) of the Metro Code. An urban reserve plan includes, but is not limited to a conceptual land use plan and concept map for the entire land area covered by the urban reserve plan.

1 **II. Planning Areas.**

2
3 The parties to this Memorandum agree that it applies to those approved Urban Reserve sites
4 shown on attached exhibits "A-1" through "A-9" (hereinafter collectively referred to as the
5 "planning areas") as affirmed either by the State Land Use Board of Appeals (LUBA) in LUBA
6 Nos. 97-050 through -057 and 97-063 or in any approved settlement thereof. The parties
7 understand and agree that:

- 8
9 1. Impacts on and relationships of the planning areas (and individual Urban Reserve sites) to
10 other areas in the City and County can be considered during the urban reserve planning
11 process; and,
12
13 2. An urban reserve plan may cover one or more of the Urban Reserve sites; provided,
14 however, that a single urban reserve plan may cover Urban Reserve Sites Nos. 51, 52, 53,
15 54 and 55 because these sites share common transportation, public utility, schools, sewer
16 and water supply needs and issues and may be best master-planned collectively.
17

18 **III. Planning Roles.**

19
20 The parties agree that the following planning roles within the planning areas shall be assigned to
21 the City and County:

- 22
23 A. The City shall prepare one or more urban reserve plan(s), and adopt corresponding City
24 comprehensive plan amendments upon their approval by the Metro Council, for the planning
25 areas which address the following applicable plan requirements in Metro Code, Sec. 3.01-
26 012(e) (1-13):
27
28 1. Residential densities within the planning areas that permit at least ten (10) dwelling
29 units per net developable residential acre in accordance with Metro Code, Sec. 3.01-
30 012(e)(3).
31
32 2. Housing measures that provide for a diverse housing stock within the Area that
33 address housing requirements described in ORS 197.303 in accordance with Metro
34 Code, Sec. 3.01-012(e)(5).
35
36 3. "Affordable housing" provisions that meet performance requirements described in
37 Metro Code, Sec. 3.01-012(e)(6).
38
39 4. Provisions that permit sufficient commercial and industrial development to meet the
40 need for such development within the planning areas and adjacent lands inside the
41 UGB in a manner consistent with Metro Region 2040 Growth Concept Design Types
42 in accordance with Metro Code, Sec. 3.01-012(e)(7).

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5. A conceptual transportation system plan for the planning areas that would be consistent with the Metro Regional Transportation System Plan and with the protection of natural resources as required by Metro functional plans in accordance with Metro Code, Sec. 3.01-012(e)(8). Proposed transportation system improvements (including recommended design standards and construction timing) for the area shall be coordinated and consistent with the design and operation of the County transportation system as prescribed in its Transportation System Plan
 6. Provisions that identify, map and describe a funding strategy for protecting areas inside the planning areas from development due to wildlife habitat protection, water quality enhancement and mitigation and natural hazards mitigation in accordance with Metro Code, Sec. 3.01-012(e)(9).
 7. A conceptual public facilities and services plan for the planning areas which includes rough cost estimates for providing public infrastructure, parks, public safety and fire protection services and facilities and their financing in accordance with Metro Code, Sec. 3.01-012(e)(10).
 8. A conceptual school plan in accordance with Metro Code, Sec. 3.-01-012(e)(11).
 9. In accordance with Metro Code, Sec. 3.01-012(e)(12), an urban reserve plan map of the planning areas showing at least the following information when applicable:
 - a. Major roadway connections and public facilities;
 - b. location of unbuildable lands including steep slopes, wetlands, floodplains and riparian areas;
 - c. general locations for commercial and industrial lands;
 - d. general locations for single and multi-family housing;
 - e. general locations for public open space, plazas and neighborhood centers; and
 - f. general locations or alternative locations for any needed school, park or fire hall sites.
 - E. The City agrees that the urban reserve plan shall be coordinated among the City, County, School District(s) and other affected service districts and shall be approved by the City prior to submittal to the Metro Council for Metro adoption pursuant to Metro Code, Sec. 3.01-012(e)(13).
 - F. The City shall establish and conduct a public involvement program for plan formulation in consultation with the County, the Hillsboro CIAC, and assigned representatives of the County Citizen Participation Organization (CPO) in which the planning areas are situated. The City shall be responsible for funding the preparation of the plan(s); however, any cost incurred by the County in participating in their preparation or providing comments on the plan(s) shall be borne by the County.

1 G. The County shall provide to the City all requested and available County data about the
2 planning areas needed to prepare the urban reserve plan(s).

3
4 H. The parties agrees that the urban reserve plan(s) shall also include an urban service
5 agreement(s) that covers the provision of these services within the planning areas shall be
6 executed at the appropriate time. It shall be consistent with ORS 195.065 and shall
7 implement this conceptual plan.
8

9 I. The City shall coordinate urban reserve plan preparation with the County through its
10 Department of Land Use & Transportation in the following manner:

11
12 1. The City shall transmit draft urban reserve plan concepts and recommendations to the
13 County for review and comment. The City shall consider the County's comments, if any,
14 prior to including such concepts and recommendations within the plan.
15

16 2. If a specific County comment will not be accommodated within the plan, the City shall
17 explain its reasons therefor in writing prior to submittal of the urban reserve plan for
18 review and action by the City Planning Commission and City Council. The County may
19 raise any rejected comment before the Planning Commission or City Council.
20

21 3. The City shall notify the County in advance of any Planning Commission and City
22 Council public hearing on the urban reserve plan in accordance with existing City
23 comprehensive plan amendments public notice requirements.
24

25 4. The City Council shall approve any urban reserve plan(s) for the planning areas to be
26 referred to the Metro Council for formal approval pursuant to the Metro Code.
27

28 E. County "rural" zoning of the planning areas shall be adopted prior to its inclusion within the
29 UGB. Such zoning shall restrict the development of urban uses and urban infrastructure
30 development, and shall remain in effect until City annexation of the area. Current County
31 zoning of the planning area may be used to satisfy this requirement if it achieves these
32 objectives. The City shall have the opportunity to review and comment on such zoning.
33

34 **IV. Memorandum Effective Date; Completion of Urban Reserve Plan(s).**
35

36 A. On the effective date of this Memorandum, any and all County planning authority within the
37 planning areas needed by the City in order to prepare the urban reserve plan(s) required by
38 the Metro Code is hereby assigned to the City.
39

40 B. The City shall complete the preparation of the urban reserve plan(s) in accordance with the
41 following timetable:
42

43 1. If Metro includes the planning areas within Urban Reserves to be included within the
44 Urban Growth Boundary by December 31, 1998, preparation of the urban reserve plan(s)
45 shall be completed for submittal to Metro by September 30, 1998.

1
2 2. If Metro includes the planning areas within Urban Reserves to be included within the
3 Urban Growth Boundary by December 31, 1999, preparation of the urban reserve plan(s)
4 shall be completed for submittal to Metro by September 30, 1999.
5

6 **V. Planning Area Annexation to the City.**
7

8 A. The parties understand that the City shall initiate action to annex properties within the
9 planning area to the City after their inclusion within the UGB. The County hereby agrees to
10 support such annexation unless annexation is invalid under applicable annexation laws.
11

12 **V. Amendments, Termination & Expiration.**
13

14 The parties may request amendments to any provision in this Memorandum. To be effective,
15 both parties must agree in writing to any such amendment. Disagreement over a requested
16 amendment shall not be grounds for termination of this Memorandum of Understanding. This
17 Memorandum may be terminated by either party thirty (30) days after written notice of
18 termination has been mailed to the other party. The Memorandum and the obligations of the
19 parties thereunder shall expire upon adoption by the Hillsboro City Council of all City
20 comprehensive plan amendments required hereunder, or on December 31, 2000, whichever
21 occurs first.
22
23

24 IN WITNESS THEREOF, the parties have executed this Memorandum of Understanding on the
25 date set under their signatures.
26
27

28 WASHINGTON COUNTY

CITY OF HILLSBORO

29
30
31
32 By John Rosenberger
33 John Rosenberger, Director
34 Dept of Land Use & Transportation

31
32 By Winslow C. Brooks
33 Winslow C. Brooks, Director
34 Planning Department

35
36 Date: 1-29-98
37

35
36 Date: 1/29/98
37

38 attach:

S. HILLSBORO URBAN RES.

9-23-98

TASK FORCE VOTE
TO APPROVE LAND + TRANS. PLANS

<u>NEIGHBORS</u>		YES	NO
CPO # 6	LARRANCE		X
CPO # 10	BREINDAEL (ABSENT)		
CPO # 9	KRISTOVICH (ABSENT)		

<u>OWNERS</u>		YES	NO
WEST	BEATTIE	X	
WEST	PLATT	X	
CENTRAL	DRAPER	X	
CENTRAL	HANAUER	X	
SOUTH	WILLIAMS (ABSENT)		

<u>BUSINESSES</u>		YES	NO
RESERVE GOLF	PARK	X	
ROSEWAY	ZURBURGG (ABSENT)		
INTEL	LEGAULT	X	
T.V. HIWAY BUS.	VAN BEVEREN		ABSTAIN

<u>Gov.</u>		YES	NO
WINK (HILLSBORO)		X	
D.L.G.D.	MEG MEG (IS SHE REALLY A MEMBER?)		ABSTAIN
WA. Co.	ANDY BISH OR MARK BROWN (ABSENT)		
METRO	MARK TRAPPEL (ABSENT)		

HILLSBORO PLAN. COMM. BRIAN ROBERTS (ABSENT)

Contact List

SOUTHERN HILLSBORO URBAN RESERVE CONCEPT PLAN				
Task Force				
Group Represented	Name	Address	Phone	Fax
NEIGHBORS				
1 CPO-6	Steve Larrance	20660 SW Kinnaman, Aloha 97007	649-3482	
2 CPO-10	Bob Breivogel	3915 SW 229th Ave., Aloha 97007	649-5071	
3 CPO-9	Ed Kristovich	167 NE 12th Ave., Hillsboro 97124	681-0728	
OWNERS				
6 West	Toni Beattie	3860 SW River Road, Hillsboro 97123	640-3217	
7 West	Bob Platt	23805 SW Davis St. Hillsboro 97123	279-3390	279-3590
8 Central	Doug Draper	11535 SW Durham Road, Suite E-9 Tigard 97224 Area Code (909)	968-23332	598-1849
9 Central	Joe Hanauer	361 Forest Ave., Suite 220 Laguna Beach, CA 92651	494-2333	
10 South	Rebecca Williams	5775 SW 209th Ave., Aloha 97007	642-1928	
BUSINESSES				
11 Reserve Golf Course	Jin Park	10700 SW Beaverton Hillsdale Hwy., Suite 50, Beaverton 97005	350-0800	671-9355
12 Roseway Industrial Park	Gene Zurbrugg	380 SW Washington, Hillsboro 97123	681-0912	
13 Intel Corporation	Ray Legault	5200 NW Elam Young Pkwy., AG1-103, Hillsboro 97124-6497	696-5058	696-8170
14 Tualatin Valley Highway Businesses	Rick VanBeveren	2858 NE Jackson School Rd., 97124	642-9898	
GOVERNMENT				
15 City of Hillsboro	Wink Brooks	123 W. Main Street, Rm. 250, Hillsboro 97123	681-6231	681-6245
16 Planning Commissioner	Brian Roberts	1854 SE Meadowlark Dr., Hillsboro 97123	640-8545	
17 Washington County	Brent Curtis	155 N First Street, Rm. 350, Hillsboro 97123	640-3519	693-4412
18 Metro	Mark Turpel	600 NE Grand, Ave., Portland 97232	797-1734	

February 10, 1997

4451 SW 229th Ave.
Aloha, OR 97007-8517
642-1006
e-mail 73554.2103@CompuServe.Com

To: Dick Matthews, Oregon State Historical Society;
✓ Joan Smith, Washington County Historical Society;
June Olson, Confederated Tribes of Grand Ronde; and
Dr. Robert Keeler, Archeologist
RE: Urban Reserve Designation for Ladd-Reed Farm in Aloha

I would appreciate your writing a letter that will reach the Metro Council prior to 1:30 p.m. on Thursday, February 13, 1997. The council is holding the public hearing on the proposed urban reserves at that time. The council has criteria which it should be using to select the locations of future urban expansion. We believe that the Ladd Reed farm does not meet many key criteria for urban reserves. The urban reserves are being selected to allow for long-range planning by service providers and local jurisdictions, and to focus land speculation away from farm land. The decision will direct our infrastructure dollars in the direction deemed best for the future.

As part of the process, since the end of 1994, people have been asking that their land be added to the study. As you can realize, farm land is worth between \$3,000 to \$8,000 per acre, whereas even undeveloped but developable land inside the Urban Growth Boundary is going from \$70,000 to over \$150,000 per acre depending on the constraints to development and the location. Having one's land designated Urban Reserves is a big step in becoming a multi millionaire!

The next step to urbanization is to actually have the Metro Council include the land in the Urban Growth Boundary. The decision to amend the Urban Growth Boundary and add a certain property will come later, between a year and twenty years from now, and will be based on the Portland region's need to constantly maintain an adequate supply of land to meet regional needs.

The owner of the historic Ladd Reed Farm in Reedville is the Sisters of St. Mary of Oregon. The Sisters were willed the property in 1957. The Sisters have asked Metro for the third time since 1985 to move the urban growth boundary to include this property. The Council denied the previous two requests. This time, a Canadian developer has an option to buy the farm for about \$15,000 per acre that is contingent upon the Urban Reserve designation.

Considering the location, quality of soil, availability of irrigation water, and the richness of records left to us about the history of the property and the farm in the 19th century, many of us do not want to lose the opportunity to develop a living history museum on this site. We are asking for your help in pointing out the appropriateness of this idea to the Metro Council and asking that the council delete this property from Urban Reserve Study Areas 53, 54, and 55 and that it not designate the farm as an Urban Reserve.

If the council votes to NOT include this property in the urban reserves, we plan to approach the Sisters to negotiate purchase of the farm to protect the resources and historical sites there and to go forward with the living history museum and other interpretive projects.

The 463 acres includes or is significant because it is:

- The "Twallaty Band of Callapooya Indians" burial ground,
- The location of the log church which dates prior to 1851,
- The cemetery thought to be the resting place of trappers and very early settlers,
- The site of the Nathan Robinson Donation Land Claim which was one of the first farms to be cleared and cultivated prior to 1850 in the Tualatin Valley,
- The Ladd-Reed Farm, cheese factory, barn, experimental farm,
- The nut trees along the eastern edge planted by a local family,
- The poplar trees along the farm entrance that date to the 1860s, and
- Class 1 and 2 soil that is among the best farm land in the world,
- The sale of this farm provided the endowment with which Mrs. Reed founded Reed College,
- The farm that gave Reedville its name,
- The farm that made it fashionable for other influential Portland leaders to buy horse farms and land in the Reedville, and Witch Hazel areas,
- An early train stop at the property,
- The first road from Lafayette to Sulgur's ferry over the Tualatin River to Portland crossed this property,
- The southern half of the property was cleared with Chinese labor in 1907 (including the areas for the burial grounds and cemetery).
- Depending on the results of future research, the log church may have been established as a mission to the Tribe which was camped year-round 1/4 mile to west near Butternut Creek.

All of these events starting with the Native American history and including rail road development, farming in Oregon, the importing of breded livestock from the British Isles by ship, the importing and testing of seeds from all over the world on this farm, the part this research played in the beginning of OSU, the missionary period, the trappers, the early settlers and local history could all be explained in a visitors' educational center on this farm.

Additionally, Bill Isbister of Bill's Buffalos, and his business associates have the idea of using the remaining land as a buffalo reserve and interpretive center about the part the buffalo played in Indian and pioneer life.

We will never get the chance to buy this land and have the community come together to develop a cultural center if the Metro council votes to include this property in land for urbanization. We have an opportunity to influence the outcome of the voting by asking them to share our vision.

Please write to the Metro Council or fax your message to:

Metro Council President Jon Kvistad

600 NE Grand Ave.

Portland, OR 97232-2736

PHONE: (503) 797-1700

FAX: (503) 797-1793

Sincerely,

Pat Kluwin



OREGON HISTORICAL SOCIETY

AT
THE *oregon history center*

1200 S.W. PARK AVENUE PORTLAND, OREGON 97205-2483
503/306-5200 TELEPHONE 503/221-2035 FACSIMILE 503/306-5194 TDD

12 February 1997

Mr. Jon Kvistad
Council President
METRO
600 NE Grand
Portland, Oregon 97232-2763

RE: Designation of Urban Reserves

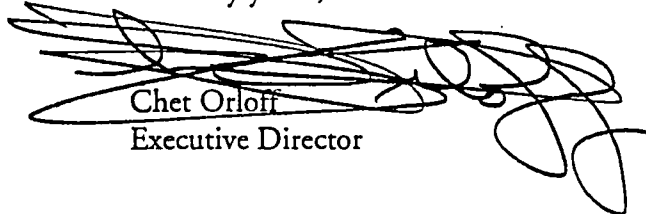
Dear President Kvistad:

I wish to comment on an issue that will be before the METRO Council on Thursday, 13 February: the possible designation of the Reed Ranch (otherwise known as the Sisters of St. Mary's property) in Washington County as an urban reserve within the current Urban Growth Boundary.

The Reed Ranch is a significant regional heritage resource. Its historic importance transcends its Washington County location. Simeon Gannet Reed was an important entrepreneur whose enterprises in transportation and banking, to name but a few, played a significant role in the development of the metro region as the premier urban center in Oregon. While the structures are now gone, the ranch site still represents important aspects of the history of the settlement and development of the Northern Willamette Valley. I urge the Council to fully consider the potential value of possible future development of the Reed Ranch as a regional heritage resource against the effects of an Urban Reserve designation before making any such decision.

Thank you for the opportunity to comment on this important issue.

Sincerely yours,



Chet Orloff
Executive Director

cc: Patricia A. Kliever, Washington County
Joan Smith, Executive Director, Washington County Museum
James Hamrick, Deputy SHPO, State Historic Preservation Office

THE STATE HISTORY MUSEUM, LIBRARY & PRESS

Incorporating The Battleship Oregon Museum, the Museum Store, Oregon Folk Arts Program, Oregon Geographic Names Board, Oregon Heritage Tourism Resource Center, Oregon Historical Society Affiliates Program, Oregon Lewis & Clark Heritage Foundation, Oregon Lewis & Clark Trail Committee



staff photos by Allan Campbell

Ken Hoggatt take a closer look at a headstone at the small, Pacific Highway in Tigard and owned by Trinity Evangelical one marks the grave of Elizabeth Biederman. The Hoggatts gton County's known cemeteries.

ath drew together, in a They met at inent Hospi- where their spouses were going kidney is.

n's wife of ars, Maxine, Phyllis' hus- of 471/2 Joe Ferrara, died in 1992. and Phyllis ed in July and started cemetery t about three is later.

ve thought it l be a nice e to his Maxi- nd my Joe," s explains. e Hoggatts their own v o r i t e eries.

Phyllis likes Hillside, near Forest Grove, where Joe was laid to rest. That's where Phyllis will be buried someday, too.

Ken prefers Crescent Grove Cemetery next to Washington Square; Maxine was buried there, and Ken eventually will lie beside her.

They also like the cemetery at Old Scotch Church in Hillsboro and the one at St. Paul Lutheran Church in Sherwood. "It's very well-kept," Phyllis notes of the latter.

They wish all the cemeteries they see were tended to with similar loving care. When they have time, the Hoggatts clear away grass and weeds growing around gravestones, and they clean moss-covered markers with a solution that doesn't harm marble.

"Never use anything metallic in cleaning headstones, and no harmful chemicals," Ken recommends. "We've found that an old wood-handled brush works best."

If, after cleaning the markers, they still can't read the faded engravings, the Hoggatts rub a large piece of chalk over the writing to make it stand out.

The Hoggatts also advise other cemetery enthusiasts to get permission before visiting a burial site, though that's not easy if you don't know who owns it.

Sometimes, though, it's obvious you're trespassing, he adds: "There's a place in Aloha with two people buried in the front yard."

northeast corner of Farmington and River roads, about 4 miles west of Beaverton, kitty corner from the Twin Oaks Tavern.

■ Johnson family (also known as Seventh-day Adventist) — Abandoned; located west of Beaverton on Farmington Road to the 150 block.

■ Emerick family (also known as Solomon Emerick) — Located south of Cornelius.

■ White family — Trachsell farm north of Reedville on Northwest 219th Avenue.

■ William Burris family — Route 1, Box 80, Hillsboro, the Arthur Connell farm established in 1855.

■ Burdorfer family — Northwest of Mountaindale, or on the Charles Hanlon farm established in 1894.

■ Edward Bruel family — Cedar Creek Canyon, near where Multnomah and Columbia counties join, established in 1918.

■ Barnum family — Nothing known.

■ Erdman Wunsch — Northwest of Buxton, established 1895.

■ Wedeking family — West of Beaverton on Pleasant Valley Road. The Hoggatts have found this cemetery, but there are no headstones.

■ James Robinson — Three miles northwest of Hillsboro on Hornecker Road, established in 1850. The Hoggatts have found the location of these graves but don't know how many graves there are or who is buried there.

■ Alec Peterson family — Community of Bacona, near the Columbia County line.

■ Parsons family (also known as the Richey farm or Oak Knoll) — West of Forest Grove along Stringtown Road.

■ Hoover — On the north side of Zion Church Road about a half-mile west of the intersection with Glencoe Road.

■ Hess family — On Callahan Farm near Gaston, established in 1917.

■ Hall Farm — Near Gaston.

■ Methodist Meeting House — On Northwest 253rd off Evergreen Road, about 2 miles north of Hillsboro, established in 1850.

■ Ellis family — Located 6 miles west and 1 mile north of Forest Grove, established in 1915.

■ "Rum & Gum" Charley — Near Middleton, established in 1884. This site contains one grave, that of a man who died under mysterious circumstances, according to the Hoggatts.

■ Stewart family — Witch Hazel area off Southwest Witch Hazel Road. Three marked graves are located here; it is unknown if there are more.

■ "No-name" cemeteries — One, probably a family burial, is located just south of Reedville along Southwest 209th Avenue. The other was the residence of the Vaught family at Southwest 195th Court and Kinnaman Road in Aloha.

(Information courtesy of Judy Goldmann of the Genealogical Forum in Portland.)

Housing prices not likely to drop

Urban-growth boundaries were envisioned to move when a need for additional land has been identified, and they should.

Metro's consideration of additions to the boundary here in the metropolitan area is timely. However, there is little evidence to support the claim that expanding the boundary will lead to more affordable housing.

In fact, expanding the boundary is a poor substitute for an affordable-housing strategy that directly addresses that problem for the households most affected. Particularly at a time when the building industry and local jurisdictions have argued against inclusionary zoning proposals, advocating boundary expansion for purposes of addressing housing affordability will likely result in raised expectations rather than lower housing prices.

ETHAN SELTZER

Northeast Portland

OREGONIAN 12-1-98

Andy's Draft – Recommended additions to preferred RTP list – (1st iteration/

1. TV Highway – Cedar Hills to 10th – 7 lanes
2. HWY 99 – 217 to Sherwood – 7 lanes
3. Murray – hwy 26 to Farmington – 7 lanes
4. 185th – Cornell to Johnson – 7 lanes
5. I-5 – Barber to Wilsonville – 8 lanes + (capacity 9000)
6. Cornelius Pass – Cornell to Hwy 26 – 7 lanes
7. Farmington – 170th to Hocken – 7 lanes
8. Farmington – 209th to 170th – 5 lanes
9. HWY 26 – 6 lanes to Shute
10. 170th – Merlo to Blanton – 5 lanes
11. Beef Bend – Bull Mountain to Scholls – 5 lanes
12. Hall – new link from Durham to Tualatin Sherwood – 5 lanes
13. Boones Ferry – Tualatin-Sherwood to Wilsonville – 5 lanes
14. Scholls – Hall to Beaverton-Hillsdale – 5 lanes
15. Baseline/Jenkins – Cedar Hills to Brookwood – 5 lanes
16. Scholls – Hall to 121st – 7 lanes
17. 185th – Rock Creek to Springville – 5 lanes
18. Cornell – Arrington to Main – 5 lanes
19. HWY 217 – HWY 26 to Allen - 8 lanes
20. Ann's capacity changes from before + look at overcrossing codings and connections.

DRAFT # 2b – Recommended additions to preferred RTP list – (2nd iteration)

1. TV Highway – Cedar Hills to 10th – 7 lanes

Change to - Cedar Hills to Brookwood – 7 lanes (5 lanes west of Brookwood)

2. HWY 99 – 217 to Sherwood – 7 lanes

Change to - 5 lanes 217 to Walnut, 7 lanes – Walnut to Beef Bend, 5 lanes Beef Bend to Fisher, 7 lanes Fisher to Sherwood

3. Murray – hwy 26 to Farmington – 7 lanes = OK

4. 185th – Cornell to Johnson – 7 lanes

Change to – Cornell to just south of Baseline – 7 lanes

5. I-5 – Barber to Wilsonville – 8 lanes + (capacity 9000) = OK

6. Cornelius Pass – Cornell to Hwy 26 – 7 lanes = OK

7. Farmington – 170th to Hocken – 7 lanes

Change to – Kinnaman to Hocken – 7 lanes

8. Farmington – 209th to 170th – 5 lanes

Change to – 209th to Kinnaman – 5 lanes

9. HWY 26 – 6 lanes to Shute

Change to – 6 lanes to Cornelius Pass

10. 170th – Merlo to Blanton – 5 lanes = OK

11. Beef Bend – Bull Mountain to Scholls – 5 lanes

OK, but recode capacity on Beef Bend from Bull Mountain to Sherwood to 1200

12. Hall – new link from Durham to Tualatin Sherwood – 5 lanes = OK

13. Boones Ferry – Tualatin-Sherwood to Wilsonville – 5 lanes = OK

14. Scholls – Hall to Beaverton-Hillsdale – 5 lanes = OK

15. Baseline/Jenkins – Cedar Hills to Brookwood – 5 lanes = OK

16. Scholls – Hall to 121st – 7 lanes = OK

17. 185th – Rock Creek to Springville – 5 lanes = OK

18. Cornell – Arrington to Main – 5 lanes = OK

19. HWY 217 – HWY 26 to Allen - 8 lanes = OK

20. Ann's capacity changes from before + look at overcrossing codings and connections. = OK

New stuff

1. New 5 lane Minor Arterial from Kinnaman/209th to River Road. Make sure centroids connect to this road as appropriate. Should be coded (speed and capacity like Baseline Road) (see Hillsboro TSP for location)

2. Kinnaman – Farmington to 209th. Make an arterial. Make it 2 lanes westbound and 1 lane eastbound. Speeds in the minor arterial range. Realign between 198th and 209th.
3. Johnson – 170th to 229th/tv highway. Make an arterial. Make it 2 lanes westbound and 1 lane eastbound. Speeds in the minor arterial range.
4. Millikan – check it. Should be 5 lanes from cedar hills to Tv hwy/160th. Should have minor arterial speeds.
5. 160th – Tv Highway to Farmington – 5 lanes – minor arterial speeds.
6. Graham’s Ferry – 900 capacity to clutter road.
7. Tiedeman/Walnut – greenburg to HWY 99, 2 lanes southbound (1800 capacity) 1 lane northbound – speed both way = minor arterial.
8. Durham – 2 lanes westbound, 1 lane eastbound from Hall to Hwy 99. Speeds = to a minor arterial.
9. 72nd – Bonita to Boones Ferry to Durham - 5 lanes
10. Check Hall between 99w and Hunzicker – should be 5 lanes with minor arterial speeds

Draft # 3 – developing a mid-day system that works (1st iteration modifications to the auto-strategic)

Additions

1. TV Highway – Cedar Hills to Cornelius Pass – 7 lanes
2. HWY 99 – Change to - 5 lanes 217 to Walnut, 7 lanes – Walnut to Beef Bend, 5 lanes Beef Bend to Fisher, 7 lanes Fisher to Sherwood
3. I-5 – 217 to 205 – 8 lanes + (capacity 9000)
4. Farmington – 5 lanes to 185th...3 lanes west of 185th
5. 170th – Merlo to Blanton – 5 lanes
6. Walker – 5 lanes – Murray to 217
7. Ann's capacity changes and corrections from before
8. New 3 lane Minor Arterial from Kinnaman/209th to River Road. Make sure centroids connect to this road as appropriate. Should be coded (speed and capacity like Baseline Road) (see Hillsboro TSP for location)
9. Tiedeman/Walnut – greenburg to HWY 99, 2 lanes southbound (1800 capacity) 1 lane northbound – speed both way = minor arterial (Ann see me...AB)

10. Durham – 2 lanes westbound, 1 lane eastbound from Hall to Hwy 99. Speeds = to a minor arterial.
11. 72nd – Bonita to Boones Ferry to Durham - 5 lanes
12. Check Hall between 99w and Hunzicker – should be 5 lanes with minor arterial speeds

Delete/Reduce capacity

1. Project 743 – Delete overcrossing of Hwy 26 between Shute and Cornelius Pass
2. Project 728 – Delete e/w connector between 185th and 231st between Walker and Baseline
3. Project 751 – Delete Johnson Street extension
4. Project 796 – Delete Meadow/143rd overcrossing of Hwy 26
5. Project 810 – Delete 173rd/174th overcrossing of Hwy 26
6. Project 774 – Barnes – Miller to 84th – reduce capacity to 1200.
7. Project 864 – Bonita Road – Hall to Bangy – reduce capacity to 900
8. Project 732 – Evergreen – glencoe to 25th reduce capacity to 700

HILLSBORO S. URA

OFF-SITE TRANS. MITIGATION

NAME	DISTANCE	COST IN MILLIONS MILE	TOTAL COST PAYMENT	BRIDGES WETLAND AT \$3 M EA.	BIG INTERSECTIONS AT \$2 M EA.
KINNAMAN	2	\$4 MILLION	\$8 M		2
BLANTON	2	\$4	8 M		2
ROSA	1	\$1	1 M		1
FARMINGTON	4	\$5	20 M		1
209	3	\$2	6 M	1	3
198	3	\$2	6 M	1	3
185 NEAR T.V.	1	\$2	2 M	1	3
RIVER RD.	3	1	3 M	1	2
ROSEDALE	3	1	3		1
229 SOUTH	1	1	1		
CENTURY NORTH	3	2	6	2	3
GRABHORN	3	1	3		1
185 NEAR FARMINGTON	1	1	1		1
JOHNSON	4	3	12	1	4
ALEXANDER N. OF T.V.	2	3	6	(2x.5) 1	2
BASELINE	1	1	1		2
BROOKWOOD	2	4	8	1	2
FARMING RURAL	2	1	2		1

TOTAL THIS PAGE

\$ 97 M	<u>9x3</u> 27	<u>31x2</u> 62 M
---------	------------------	---------------------

\$ 186 M

S. HULSBOND EXPANSION: ROAD RECONSTRUCTION COSTS
NOTE 1,

DISTANCE		\$/MI	\$ 1 M./EA. SPEC. INTER	\$ 4 M./EA. BRIDGES WETLANDS	\$ TOTAL
1	WITCH HAZEL ROAD	1/m = 1	2		3
1	DELINGE	1/m = 1	1	+25	2
1	LOIS OR DRAKE	1/m = 1			1
1	MILLER HILL RD	1/m = 1			1
1	1/3 SHARE OF 3 MILES CORNELIUS PASS RD.	5/m = 5	4 x .33 = 1.3	2 = 3 x .33 = 2.7	9
					\$ 16 M
					RUNNING TOTAL \$ 202 M

TOTAL FOR LIST \$ 202 MILLION

- NOTE:
- 1) THESE PAVEMENT COSTS MILE ARE LOWER THAN WA, CO, COST ESTIMATE SHEET
 - 2) NO R-O-W COSTS FOR THE ROAD SECTIONS ARE INCLUDED
 - 3) BRIDGE & WETLAND COSTS DO INCLUDE LAND COSTS
 - 4) INTERSECTION COSTS DO INCLUDE R-O-W COSTS
 - 5) T.V. HIWAY COSTS NOT LISTED ABOVE, DEPENDING ON LENGTH AND TYPE OF IMPROVEMENT PROPOSED AND THOSE IMPACTS UPON ADJACENT ROADS RECONSTRUCTION COSTS COULD BE IN EXCESS OF \$ 50,000,000, FROM BROOKWOOD AVE. TO MURRAY BLVD, LIMITING PRIVATE ACCESS COSTS WOULD ADD MORE COSTS.

NORTH EXPANSION SITE AREA
 N. OF EVERGREEN RD.
 ON-SITE AND OFF-SITE ROADS

MAIN
 ON-OFF-SITE
 ROADS

NAME	DIST. MILES	COST/MILE TOTAL	INTERSECTIONS		BRIDGES		FREEWAY + ARTERIAL SYSTEM	\$M TOTAL
EVERGREEN	3	7 = 21	4	\$2M/EA. = 8	0 = 0	\$4M/EA.		29
Hwy 26	3	7 = 21	2	10M/EA TOTAL 20	1 = 10	10M/EA		61
3 NEW E/W	2	7 = 14	5	10	3 = 12			22
3 NEW N/S	2	7 = 14	5	10	3 = 12			22
								\$ 134M

NOTE: 1) THESE PAVEMENT COSTS/MILE ARE HIGHER FOR THE ARTERIALS (EXCEPT HWY 26) THAN WA.CO. COST ESTIMATE SHEET

WA. CO. LUT COSTS SHEET 1998

2/15/98

Washington County Classification	Paved Width	Project Cost Per Foot	Construction Cost Per Foot	Project Cost Per Foot 1 Foot Width
wcurids				
URBAN MAJOR ARTERIAL	90	\$1,055.42	\$811.86	\$6.81
RURAL MAJOR ARTERIAL	60 ^{4 LANE}	\$559.88	\$430.68	\$6.88
URBAN MINOR ARTERIAL	42	\$579.89	\$446.07	\$6.81
RURAL MINOR ARTERIAL	42 ^{3 LANE}	\$437.17	\$336.29	\$6.88
URBAN MAJOR COLLECTOR	42 ^{3 LANE}	\$430.99	\$331.53	\$5.22
RURAL MAJOR COLLECTOR	42	\$355.57	\$273.52	\$5.29
URBAN MINOR COLLECTOR	36	\$389.22	\$299.40	\$4.86
RURAL MINOR COLLECTOR	32	\$297.91	\$229.16	\$4.92
URBAN COMMERCIAL	40	\$443.81	\$341.39	\$5.75
RURAL COMMERCIAL	34	\$357.50	\$275.00	\$5.82
URBAN LOCAL	36	\$368.08	\$283.14	\$4.33
RURAL LOCAL	24	\$252.89	\$194.53	\$4.39

Urban Major Arterial,
no sound walls \$906.80 \$697.54
no street lights \$979.48 \$753.44
no sound walls/ no street lights \$830.86 \$639.12

Urban Minor Arterial,
no street lights \$503.94 \$387.65

URBAN INTERM

5 LANES $1055.42 - (16 \times 6.81) = 946.46$

4 LANES $1055.42 - 24 \times 6.81 = 891.98$

3 LANES $= 810.26$

URBAN COLLECTOR 3 LANE

$= 430.99 \times 5280 \text{ FT.} = 2,275,627$

RURAL ARTERIAL } MINOR } w/ DITCHES } 2 OR (2.5')
NO SIDEWALK }
NO CURBS } 3 LANES (42')

$437.17 / \text{LIN FT} \times 5280 \text{ FT.} = 2,308,257 \frac{60}{100}$

RURAL ARTERIALS } MAJOR } w/ DITCHES }
NO SIDEWALK }
NO CURBS }

BRIDGES \$200/ft

WA, CO, LUT COST SHEET 1998

Washington County Classification	Paved Width	Project Cost Per Foot	Construction Cost Per Foot	Project Cost Per Foot 1 Foot Width	Construction Cost Per Foot 1 Foot Width
wcurids					
URBAN MAJOR ARTERIAL	90	\$1,055.42	\$811.86	\$6.81	\$5.24
RURAL MAJOR ARTERIAL	60	\$559.88	\$430.68	\$6.88	\$5.29
URBAN MINOR ARTERIAL	42	\$579.89	\$446.07	\$6.81	\$5.24
RURAL MINOR ARTERIAL	42	\$437.17	\$336.29	\$6.88	\$5.29
URBAN MAJOR COLLECTOR	42	\$430.99	\$331.53	\$5.22	\$4.02
RURAL MAJOR COLLECTOR	42	\$355.57	\$273.52	\$5.29	\$4.07
URBAN MINOR COLLECTOR	36	\$389.22	\$299.40	\$4.86	\$3.74
RURAL MINOR COLLECTOR	32	\$297.91	\$229.16	\$4.92	\$3.79
URBAN COMMERCIAL	40	\$443.81	\$341.39	\$5.75	\$4.42
RURAL COMMERCIAL	34	\$357.50	\$275.00	\$5.82	\$4.48
URBAN LOCAL	36	\$368.08	\$283.14	\$4.33	\$3.33
RURAL LOCAL	24	\$252.89	\$194.53	\$4.39	\$3.38
Urban Major Arterial, no sound walls no street lights no sound walls/ no street lights		\$906.80 \$979.48 \$830.86	\$697.54 \$753.44 \$639.12		
Urban Minor Arterial, no street lights		\$503.94	\$387.65		
assure					
URBAN MAJOR ARTERIAL	90		\$481.86		\$4.91
RURAL MAJOR ARTERIAL	60		\$401.02		\$4.91
URBAN MINOR ARTERIAL	42		\$246.04		\$4.91
RURAL MINOR ARTERIAL	42		\$312.59		\$4.91
URBAN MAJOR COLLECTOR	42		\$192.05		\$3.74
RURAL MAJOR COLLECTOR	42		\$241.93		\$3.74
URBAN MINOR COLLECTOR	36		\$161.90		\$3.47
RURAL MINOR COLLECTOR	32		\$201.04		\$3.47
URBAN COMMERCIAL	40		\$201.79		\$4.13
RURAL COMMERCIAL	34		\$232.46		\$4.13
URBAN LOCAL	36		\$146.25		\$3.07
RURAL LOCAL	24		\$156.82		\$3.07

ASSUMPTIONS USED FOR PROJECT QUANTITIES - URBAN ROADS 1 MILE IN LENGTH

Soft Spot Excavation: 10% of excavation
Base Rock: paved width + 1'
10" Pipe: 5280/400 x paved width
15" Pipe: 5280'
Manhole: 5280/400
Curb Inlet: 5280/400 x 2
Sidewalk: 5280 x 2 x 5/9
Curb & Gutter: 5280 x 2
Sound Wall: 5280' - 4+ lane Major Arterials only
Street Lights: 5280/160 x 2 - Arterials only

ASSUMPTIONS USED FOR PROJECT QUANTITIES - RURAL ROADS 1 MILE IN LENGTH

Excavation: paved width + 18' x (structural section +6")
Soft Spot Excavation: 10% of excavation
Ditching: 5280 X 2 - 10" pipe length
Base Rock: paved width + 18'
Leveling Rock: paved width + 18'
Class B AC: paved width
Class C AC: paved width
10" Pipe: 5280/1000 x 2 x 21.5'
15" Pipe: 5280/400 x (paved width + 8')
No Manholes, Curb Inlets, Sidewalks, Curb & Gutter, Sound Walls, or
Street Lights

ASSUMPTIONS USED FOR ASSURANCE QUANTITIES - URBAN ROADS 1 MILE IN LENGTH

Excavation: paved width + 11' x (structural section +6")
Soft Spot Excavation: 10% of excavation
Base Rock: paved width + 1'
Leveling Rock: paved width + 1'
Class B AC: paved width - 3'
Class C AC: paved width - 3'
Curb & Gutter: 5280 x 2

ASUMPTIONS USED FOR ASSURANCE QUANTITIES - RURAL ROADS 1 MILE IN LENGTH

Excavation: paved width + 18' x (structural section +6")
Soft Spot Excavation: 10% of excavation
Ditching: 5280 X 2 - 10" pipe length
Base Rock: paved width + 18'
Leveling Rock: paved width + 18'
Class B AC: paved width

WA, Co.
Right of Way Estimate

PROJECT NAME _____ PROJECT NO. _____

VARIES R/W Required _____ Total R/W Width _____

No. Properties Involved _____

Dedication _____ Sq. Ft. \$ _____
Value AF 5 \$ 40,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value AF 10 \$ 30,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value AF 20 \$ 25,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value EFC \$ 20,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value EFU \$ 20,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value R-5 \$100,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value R-9 \$125,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value R-15 \$175,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value R-24+ \$190,000 Acre

Dedication _____ Sq. Ft. \$ _____
Value NC \$ 14.00 per SF

Dedication _____ Sq. Ft. \$ _____
Value GC \$ 25.00 per SF

Dedication _____ Sq. Ft. \$ _____
Value Industrial \$ 100,000 Acre

Wetland Mitigation
/Water Quality Site 1-2 acres \$ _____

Landscape/Fences
(Existing) \$ _____

Purchase site/house
(_____) \$ _____

Relocation Costs
(_____) \$ _____

Appraisal Costs
(\$2500 per site) \$ _____

Proximity Damages
(cost to Cure) \$ _____

Utility Easements \$ _____
50% to 100% of Fee Value

Temp. Slope/Construction Ease. \$ _____
15% of Fee Value x 2

Drainage Easements \$ _____
100% of Fee Value

Perm. Slope Easements \$ _____
100% of Fee Value

Soundwall Easements \$ _____
100% of Fee Value

R/W Mapping, descriptions \$ _____
recording, title reports,
5% of Total Project Costs

Projected Court Costs \$ _____
Condemnation: 35% of total
project costs

Subtotal \$ _____

Administrative Costs \$ _____
(30% of Subtotal)

Total R/W Costs Est. \$ _____

ROUNDED \$ _____

DATE OF ESTIMATE _____

PROPOSED DATE OF PROJECT UNKNOWN

NOTES: Estimate prepared with out benefit of preliminary plans, engineering data, cross sections or descriptions for easements. Estimate based on Transportation Plan and County Road Standards. It is expressly assumed that retaining walls and sound walls will be utilized to mitigate proximity damages and grade changes.

Projected Real Estate values in the Portland Metro Area are increasing at 8% to 12% per year. Adjust values accordingly based on projected bid date.

November 12, 1998

Charles Cameron
Washington County Administrator
155 N. First Ave. , Suite 300
Hillsboro, Or. 97124

Re: Hillsboro South Urban Reserve Area

Mr. Cameron:

The Planning Directors for the city of Hillsboro and Washington County have signed an agreement allowing the city to plan certain rural properties for possible inclusion within the Urban Growth Boundary. That agreement does not delete Washington County's responsibility to the citizens outside that specific rural planning area.

The citizens of CPO #6 request that the county Dept. of Land Use and Transportation (LUT) perform an analysis of both the adequacy and the cost of constructing the proposed on-site and off-site roadway improvements as outlined in the Transportation Report element, dated 10-29-98, of the Hillsboro South Urban Reserve Concept Plan. We know that some LUT modeling of the site has been completed, and that it shows the need for more mitigation consisting of different configurations of lanes on certain roads and even reconstruction to other roadways which are not addressed on the Hillsboro Plan. That proposed plan has not responded to your LUT Task Force representative's comments pointing out these differences. To us, this puts not only the mitigation roadway projects in question but also the trip generation and trip direction methodology. The total on-site and off-site costs and % of cost participation for off-site projects by site developers could also change dramatically from the charts in the plan.

There are professional engineers on your LUT staff who could advise us all on whether the proposed Transportation Report is accurate, adequate and costed correctly. This is one of if not the biggest single development proposal in Washington County in many years, over 20,000 new people on 1600 acres. If the appropriate transportation infrastructure is not funded and constructed the impacts will be devastating to a large portion of the county, both urban and rural. Please provide us all with the proper analysis the situation demands. We will provide anything we can to assist in the analysis.

Respectfully submitted,

Steve Larrance
CPO #6 Task Force representative
20660 S.W. Kinnaman Rd. Aloha, Or. 97007



WASHINGTON COUNTY
OREGON

November 30, 1998

Steve Larrance
CPO 6 Task Force Representative
20660 SW Kinnaman Road
Aloha, OR 97006

Dear Steve:

Thank you for your letter of November 12, 1998 regarding the Hillsboro south urban reserve area. As usual, your request is well thought out and clear.

However, at their worksession of November 24, the Board of Commissioners did not direct that the requested work be done at this time. After discussing the matter with Department of Land Use and Transportation staff, it was agreed that the requested transportation modeling could not be produced before the December 3, 1998 deadline. The staff feels the work would entail considerable staff time resulting in a time of completion of several weeks. Staff indicated this work would be done as a part of the County's transportation improvement plan update. And, while a schedule is not yet set, the Board would like to see a proposal from the department that would accelerate the modeling you requested. Of course, the proposal and the results of the modeling will be made available to CPO 6.

Once again, thank you for your letter.

Sincerely,

Charles D. Cameron
County Administrator

c: Board of Commissioners
CPO Coordinators
John Rosenberger
Tim Erwert
Brent Curtis
Ellen Cooper

Date: Nov. 12, 1998

Subject: Minority Report from the Hillsboro South Urban Reserve Task Force

Hillsboro Planning Commission members:

As a Task Force member I thank you for this opportunity to address the recommendation of that group to you . First, it is informative to note when the group voted and who voted. Our last regularly scheduled meeting was Sept. 9th. There was a consensus that the group was not willing to make a recommendation at that time because the Transportation Plan element of the Concept Plan had not yet been made available to us. An additional meeting was then scheduled for two weeks later and the missing element was to be sent to us. On Sept. 23 the Task Force again meet and for the first time the Traffic consultant was present. The motion to recommend the concept plan including the transportation report was made by one of the site land owners. Discussion occurred for about 15 minutes before anyone would second the motion. The votes were cast and the outcome was 7 to recommend and 1 opposed. Four land owners, Mr. Brooks, the Reserve Golf Course and Intel supported the recommendation. There were two abstentions and seven members were absent, many of these people had consistently expressed concerns about traffic impacts and costs. I was the one "no" vote. At the time it was clear to me that only Mr. Brooks and I were not making this decision based on our own personal business interests. I requested and Mr. Brooks agreed on the spot that a minority report was expected.

My name is Steve Larrance, I am a former two term county commissioner and CPO #6 officer. My commissioner district stretched from Cornelius Pass Road east to the county line. I've had to learn about transportation planning and implementation in my close to twenty years of volunteer and elected work in our county. As you may know I have always been pro-development. I supported the Benj Franklin's proposal to development the St. Mary's property some years ago. This proposal before you now bears little resemblance to that 460 acre industrial/residential proposal which did not gain admission to the UGB. The impacts of adding over 1600 acres with over 20,000 new people with no limited access freeway bisecting it, as the former proposal had, makes this an entirely different fit. Even so it was not until the conceptual planning process was more than half over that I came to realize that this was simply too much, too soon and too expensive.

Instead of a planning exercise I was to realize that this is a very beautifully wrapped marketing package. Wrapped by the most skilled group of consultants from our region that could be assembled. But if you take off the wrapper you find the most densely populated bedroom shoe horned into an existing area which by plan is now very under served by transportation facilities. The CPO#6 Community Plan adopted in 1983 was designated with higher than average density for our county as a whole

because we had the existing state roads such as T.V. Hiway and Farmington Road which were on the old ODOT Six Year Plan for improvement and the soon to be built Westside Bypass. We were to be well served. I was the citizen's advisory committee chairman for the Farmington Road widening project in 1981. It was to be built within four years all the way west to 209th Avenue with five lanes. None of these ever happened. None is even on the drawing board anymore. Farmington is only funded west to 173rd with five lanes and the county modeling shows that it should be seven lanes if this high density UGB expansion proposal is accepted. So you have a new one and a third mile long arterial costing over \$16 million obsolete if you could get the people to it. This is just the tip of the iceberg ready to send our ship to the bottom.

This is all starting to sound very melodramatic. And it will get worse. But sadly, it is all true. Please bear with me for some startling facts. The Transportation Report element of the Concept Plan is based on some "facts" or assumptions that hardly pass the laugh test. First of all there is an assumption that T.V. Hiway will not need to be improved until after the year 2015, even with the addition of these over 20,000 new residents living next to it. This assumption comes from the Hillsboro Transportation Plan. This roadway was constructed to the present configuration in 1955, the year I started to Reedville Grade School. ODOT says that their principal arterial is now at capacity and they have no plans to improve it. Another interesting assumption is that with 8,500 households on site there are only .8 trips, that's point eight trips, per household in the P.M. peak hour. That means the trip generation figures are derived assuming that not even one person per household comes home during the P.M. peak. Makes you wonder why its called "peak hour". Another assumption is that 30% of the trips are either on-site or non-auto during that same peak hour. Remember that there are only 2000 mid to low range jobs to be created on site, so almost all site dwellers will leave to go to work each day. Are you beginning to understand why the plan draws the conclusion it does on page 24 that states "According to the analysis conducted for the Hillsboro Urban Reserve Concept Plan, TV Highway will not need to be widened beyond its five-lane cross-section to accommodate 2015 traffic levels." Could it be that the assumptions are allowing the plan to underestimate the off-site trips? Do you ever try to drive that over loaded road in the late afternoon? Do you wonder why "road rage" is so prevalent today? Do you really think that more than 20,000 new people living next to it won't make it a parking lot for even more than the two hours legitimized by Metro's new one hour of level E and one hour of level F in that afternoon peak period? I guess these "facts" really don't pass the laugh test. I finally did realize that this proposal is too much too soon before we can properly readdress the flaw of accepting that kind of legitimized congestion as a regional policy. And we need to update the Hillsboro Transportation Plan concept that TV Highway is "just fine, thank you" for almost twenty more years. Modeling is only as good as the assumptions you put into it. It is any wonder that this Transportation Report element of the Concept Plan is flawed. We have allowed it to be flawed by not realizing the drastic consequences which "little things" like that have when they are applied to an enormous development package such as the Hillsboro South Urban Reserve Area.

Too costly can mean money for off-site road improvements, but it can also at the

same time mean too costly in other ways also. I learned about these types of costs first hand when I co-chaired the Citizens Advisory Committee for the 185th Avenue widening project in 1985. As you can see in the Hillsboro South Urban Reserve area, if the trips are underestimated then it is a simple step to under estimate the size of the many "new " necessary off-site arterials. I say "new" but in most cases it will be old local and small collector streets which will need to be torn up and reconstructed into big wide arterials. That means \$ won't be the only costs. Peoples lives will be drastically changed. The street construction, even if we really had the money to do it, would be much wider that the existing right-of-way. Some homes would be lost through widening and others would be lost due to the necessity to realign existing off-set intersections. One church, the Intel surface water detention facility and the Aloha Post Office are some of the places which would be lost to realignments as the plan is now drawn. I could tell you some teary eyed stories about people loosing much more than their building when their homes were bulldozed on the 185th Avenue project. All of the small streets that the Hillsboro South plan envisions widening have many more homes on each of them than old 185th Avenue. Many of the now country roads proposed to be rebuilt have many many single family homes with driveways. If you are lucky enough to save your house just try backing out into arterial traffic to leave. In fact there are also about 10 schools on these roads with students walking plus several facilities for developmentally challenged students who must also walk on these roads. Big busy arterials tend to divide up neighborhoods. The identity and the cohesive neighborhood feeling will be lost just to serve the thousands of new expansion residents that the existing adopted transportation plan did not foresee. I don't know which is worse, the old roads clogged with new traffic because we can't afford to reconstruct them or the expensive big new roads with whizzing commuters making it difficult to cross them. It's looking more like the former instead of the later that we will be dealing with if this expansion goes forward.

Now, the high construction costs for new and rebuilt arterials. I call them arterials because that is how they function. The proposed plan envisions the three going north carrying fully 50% of the trips off of the site to jobs in the north of the city. We know it is more than a little presumptuous to assume that one out of every two jobs held by all the employed persons who live on the Hillsboro site will work in the north of the city and even if they did, electronics employment statistics tell us that those workers switch jobs on the average every three years. So one of the two wage earners in a given household may work in the north employment area this year but next year or the year after that they may work in Wilsonville or Beaverton or Vancouver. But lets just suppose than 50% of the work trips are going north. You would need three big arterials to carry them a minimum of four miles. There happens to be several creeks in the way. Multiple bridges on each north arterial with the accompanying wet lands mitigation and recreation is very expensive. Often another neighborhood is impacted to go elsewhere to do the wetlands recreation. Then there are the E/W arterials constructed on existing local collectors with narrow footprints and expensive intersection realignments. So it isn't just construction costs and engineering of the actual roadway, its these water hazards, the sidewalks and bike lanes, the street lights and street trees, the sound walls, and last but most difficult of all to coordinate the long

list of utilities to be relocated temporarily several times before they're finally put into the permanent location.

I've done a representative cost analysis using Washington County's estimate costs for both construction and R-O-W purchasing where applicable. It should be noted that the county's estimate costs are lower than the costs now being encountered on the Farmington Road project now in progress. My analysis indicates that it is very likely that all the Traffic Impact Fee (TIF) collected on-site will be refunded to the on-site developers for on-site road building which will be considered as capacity improvements. By under estimating those on-site construction costs the chart on page 29 makes it appear that some TIF funds will be remaining for the off-site projects on page 30. I am sure that the cost projections on these two charts are based on real costs somewhere, but I feel that the Washington County cost estimates are probably more indicative of the local construction experience. For example, on the on-site chart on page 29 for the Cornelius Pass Rd. the chart says \$3,000,000. But the county would use \$945 per lineal foot which would equal \$4,725,000. Like wise on the off-site chart on page 30 for Cornelius Pass Rd. on the Baseline to Cornell section the chart says a 31% share would equal \$1,350,000 but the county would use that same \$945 per lineal foot which would equal \$2,464,500. To this finished pavement construction amount the appropriate share of the costs to cross two major creeks, mitigate a great deal of wetlands especially near the light rail over pass and to purchase R-O-W would need to be added. The 31% share could easily be over \$5,000,000 for just that one segment.

Other reasons to not move forward now with this proposal may not be as easily quantifiable as the urban roads issue but they are equally important. Many people have grave concerns about the rural roads which surround this site on two sides. We have seen many more commuters using the "country roads" for several reasons. As the congestion becomes unbearable inside the UGB many people feel that it might be farther to travel outside the boundary but at least they keep moving. And of course, in our region many times the straight line route is outside the boundary. This plan may be politically correct in underestimating trips to the west and particularly to the south but it is also inaccurate in doing so. I live very near the proposed expansion site and many of my neighbors and even my wife work to the south. To suppose that this practice will be different across the street on the site seems to me to be very short sighted. Another impact could easily be ground and surface water changes particularly downhill from the site. There are also a whole list of historical sites in the Hillsboro South Urban reserve area. From an old Indian encampment area along Butternut Creek where arrow heads were commonly found until recently. The old families all mention an Indian burial ground on the Ladd and Reed farm. Also the original Military Road through the Tualatin Valley, one of the earliest roads established in our state, runs across that farm. There is at least one cemetery along that early road mentioned in old literature. It does appear that the Ladd-Reed town center would surely cover it. William Ladd and Simeon Reed established a very productive and progressive farm company in the 1870's on what is now referred to as the St. Mary's property. The farm was famous for its imported livestock, racing horses,

innovative crop rotations and the creamery and cheese factory. There are groves of ancient native White Oaks in the fields and 130 year old Buckeyes along the old highway and similar aged Black Walnut trees along 209th Ave. These trees should be saved. The buildings are gone but the sites are fairly undisturbed except for the cultivation of grain farming. It would be a terrible loss to destroy this site which is on the adopted cultural resources inventory of Washington County. I mentioned all of these items at the first Task Force meeting and suggested that public areas could be designated for these fragile spots but as you can see this is not reflected in the plan.

There are plenty of other reasons not to move forward at this time on this site besides the apparent \$150 - \$200 million hole that the urban off-site transportation mitigation could easily cost us all. There is no money source at any level available to fund the proposed mitigation projects. I'm sure you realize that unless a road construction project is fully funded it will not begin or ever come to fruition. You could consider the already substantial liability in our transportation system from this decade of "fast-forward" building that our part of the world has experienced. Just how deep do we dig that hole before we look at the policies that got us to this spot? How deep do we dig before we pay off our existing debt by first securing funding to build out the badly needed existing adopted roads to serve the existing urban areas? National studies have recently indicated that we have sunk to the lowest level of roadway conditions in our country. I am not proud of that. It wasn't that long ago that our roads were considered to be among the best. Sure we invested in some other modes of transportation. And we're proud of that kind of far-sighted public purchase and proud of the visionaries who guided us there. But we can't forget that on the local level, where you can't print money, we must continue to invest in all of the parts of our transportation system.

In 1983 when the Aloha, Reedville and Cooper Mountain Community Plan and the accompanying Transportation Plan were adopted both parts were envisioned to develop together. The residentially dense Land Use Plan did build out except in portions of old Aloha and on several very large parcels in Reedville and on Cooper Mountain. The economic pressure inside the UGB has apparently not been great enough yet for those areas to develop. But decision after decision has stripped the transportation plan components from us. We feel this is akin to allowing a living body to grow and develop and at the last minute somehow strip out the main arteries and veins. It would be bad enough to let us wither and die but now a plan is fast gaining legitimacy to smother us with human bodies and automobiles. Instead of this quick death for one of the oldest and most productive parts of our region we plead with you, the decisions makers in Hillsboro, to demand that Metro revisit the urban reserves locational question. Since the recent defeat of light rail into Clackamas County our regional government seems intent on bestowing most of the new urban lands in Washington County. You could be the light and lead them to a planning based decision to locate those future predominately residential urban uses closer to the future jobs, about 4 miles north, so that transportation infrastructure is efficient and affordable. After all the Metro Code requires that Urban Growth Boundary amendments do just that and like icing on a cake ODOT has a commitment to upgrade

Hwy. 26, which is 4.5 miles north of the proposed expansion site . One more year wait to do the correct placement is wise judgment. Just like with the light rail station areas, the closest of which is 3.25 miles to the north, density follows fully developed transportation infrastructure.

My father told me many times, "If you can't do a good job at a task don't do it".

I'm sure you also feel that it is both an honor and a duty to serve your neighbors and thank you for this opportunity to share with you some of my lessons learned.

Respectfully submitted,

Steve Larrance
20660 S.W. Kinnaman Rd.
Aloha, Or. 97007
649-3482

Our regional government, Metro, is poised to make the first major addition of land to the Regional Urban Growth Boundary since the boundary was put in place 20 years ago. I am writing to alert the citizens of Washington County to the prospect of gridlock on our streets and irreparable damage to existing neighborhoods if the so-called South Hillsboro Urban Reserve Areas are included as currently planned.

Why is this happening? The City of Hillsboro has said there is not enough vacant land in the UGB to meet the housing needs of approximately 60,000 jobs planned in the fast growing industrial area between the light rail line and the Sunset Hwy. If residential land in the UGB cannot provide the housing for this huge employment base, then there appear to be two choices. People can use their cars and mass transit to travel from other urban areas in the region which will require additional spending on roads and mass transit. Or farm land adjacent to the new jobs can be added to the UGB for new housing.

In reality a third alternative is rapidly becoming the preferred solution of Hillsboro and Metro. It would bring farm land into the UGB for housing AND require massive road construction spending. Approximately 1600 acres south of TV Hwy and west of 209th to the Tualatin River are proposed to house over 20,000 people in a dense mix of large apartments, other attached housing types and some single family homes. These are the South Hillsboro Urban Reserve Areas.

The South Hillsboro URAs are over four miles south of the employment area. Three arterials are proposed through the existing neighborhoods to the north to handle the car and transit trips. In addition to new right of way for widening, there will be six major creek crossings and dozens of intersection reconstructions. Because TV Hwy will not be able to handle the traffic, three

arterials are planned as alternative east-west routes. These are Blanton, Kinnaman and Rosa which will eventually dump their traffic back on TV Hwy or Farmington Road.

Proposed realignments will destroy many existing structures including a church and the Aloha Post Office. The new wide streets will be clogged with arterial traffic passing through the existing neighborhoods on what were smaller local collector streets which means local traffic will be forced to use the arterials for local trips. Also many commuters will choose to use the rural roads to avoid the gridlock.

But will these new arterials even be built? Currently a mile and half section of Farmington Road, east of 173rd, is being widened to five lanes for over \$16 million. Washington County traffic modeling predicts that this section will need to be rebuilt to seven lanes if this South Hillsboro area is urbanized. The true costs to make the necessary road expansions outside of the South Hillsboro site could easily be \$150-\$200 million. The transportation study funded by the developers estimates far lower costs based on questionable assumptions. Because of the way that the Traffic Impact Fee is calculated, it is likely that no developer money will be available for off site needs. TV Hwy and Farmington Road are State highways. The State has no plans for additional improvements to them. There is only one conclusion. Our existing streets and highways will not be rebuilt as this development occurs because the money does not exist in the public sector. Any funds that were magically appropriated would surely come at the expense of waiting and prioritized reconstruction projects elsewhere. If funding became available in the far future, we would be trading gridlock for big arterials in our front yards.

You may be asking, "How can we be heading quickly in this direction. Isn't our government driven comprehensive planning process, which has been characterized by a generally unbiased

perspective, intended to prevent just these kinds of short sighted results?" There is no simple answer. But the single biggest factor is that government planning is not driving this process. For the first time the private sector is, and this is how.

Last year the state Legislature told Metro to insure that enough land is in the UGB to satisfy a 20 year need for growth. The Metro Council decided that land must be added to the boundary to satisfy that need. But that addition is not supposed to occur until plans are approved showing the type of development and how we will solve the problems of impact and cost I have described. In most instances, and in the case of South Hillsboro, the money to create those plans has been provided by developers with an interest in specific lands. Their incentive is to move their property to the top of the list, not to solve the thorny issues of site impacts and costs.

The result, whether intended or not, is that our region's first major urban land expansion in 20 years is being driven not by the sound planning principles that Oregon is nationally known for, but instead by the quickest and slickest marketing package masquerading as a plan.

There is an alternative. Lands exist next to the jobs, between Evergreen Road and Sunset Hwy. These lands are also much closer to light rail. It appears that this area, with considerably less off site road reconstruction necessary, could be served for about a third of the public costs, utilize existing and planned improvements to the transportation system, and would not do the same damage to existing neighborhoods and collector streets. Deferring the decision in order to study these lands will not add significantly to public costs and in fact, probably will not delay the time table for development.

The Metro Council intends to make a decision on December 3. You need to make your views

known to the Council, especially to the Councilors from Washington County, Susan McClain and Jon Kvistad. Also contact Hillsboro City Councilors and Planning Commission members and County Commissioners. Our elected leaders need to know that you support only "smart growth" through wise public investment in our land use and transportation system.

Steve Larrance is a general contractor who is a fourth generation Washington County resident. He has participated in the land use and transportation planning process since the 1970's and was a two term county commissioner and a member of the Hillsboro South Urban Reserve Task Force. He was the chair of the citizens's advisory committee for the Farmington Road widening project in 1981 and co-chair for the 185th Ave. widening project in 1985.

What is "smart growth" and how do we achieve it? In deciding where to expand the Urban Growth Boundary this December, our elected regional representatives, the Metro Councilors, should have answers to these critical questions. Whether or not they do, the decisions they make will in a very large fashion determine the quality of life in the region for generations.

The Regional Urban Growth Boundary, dividing urban land from rural land, was first drawn twenty years ago and has remained largely unchanged since. Last year the state Legislature directed Metro to take action to assure a twenty year supply of land in the UGB to meet predicted needs for housing and jobs. It directed Metro to add at least one-half of the needed land by the end of 1998 and the second half by the end of 1999.

A major expansion of the UGB raises issues such as: what are our needs, what densities are needed and acceptable to meet the needs, what will the transportation system including mass transit necessary to meet those needs look like, how will we protect farm and forest lands? The critical questions to be answered ultimately are, where will the growth occur and how will we pay for it?

Difficult as these issues and questions are, with our collective years of experience and successful planning efforts and with our established statewide, regional and local goals and vision statements, it would seem that the decisions could flow from a relatively straightforward technical process. And they would, except that Metro has allowed itself to adopt a decision making process with little regard for that experience and those standards.

Instead, the decision of where growth will occur is being driven by proposals from owners and prospective developers of rural lands. And it seems no one is attempting to answer how we will

pay for the growth.

This state of affairs arose from an admirable requirement. Before any land is added to the UGB it must have a concept plan approved by Metro that details among other things, what the proposed land uses and densities will be, provisions for affordable housing and meeting commercial and industrial needs, which agencies will provide the urban services and schools, and a transportation plan.

The problem is that Metro did not assume the responsibility to create these plans. It allowed any rural owner or developer of land within an Urban Reserve Area to prepare the plan at their cost, provided only that the affected city or county is willing to let them do it. The result, whether intended or not, is that our region's first major urban land expansion in 20 years is being driven not by the sound planning principles that we are nationally known for, but instead by who can create the best looking marketing package masquerading as a plan.

It is not reasonable to expect these privately generated plans to candidly discuss the problems associated with the proposed development. The Metro Code, interpreting state laws, requires that proposed uses within an expansion area be made compatible with adjacent neighborhoods. It requires that areas added to the UGB must have the lowest net increase in cost of urban services compared to other available areas. Unfortunately, in Metro's current process, it appears that the plans generated for the most part by the property owners are being relied upon to satisfy these requirements. And the failure of owners of potentially better alternative sites to step forward with plans has kept some of those sites off the list of candidates.

The shortcomings of this process are nowhere better demonstrated than in the Hillsboro South

Urban Reserve Areas south of the Tualatin Valley Highway and west of 209th in Washington County. The corporate owners of two large old farms totaling about 700 acres currently zoned for exclusive farm use have hired an all-star group of consultants to prepare the development plan for about 1,600 acres including their land. The City of Hillsboro wants to annex this area to provide housing for over 20,000 people to balance a surplus of planned jobs over available housing. The jobs are in the City, over four miles north, near light rail and Hwy 26. The proposed development is over three miles south of light rail.

Since the existing transportation system in the area is heavily dependent on State maintained TV Highway and Farmington Road which are at or near capacity with no planned State assistance, the property owners propose a new arterial system. The problem is that they make no commitment to pay for this system once it leaves their property. This system of three large north-south arterials and at least two east-west arterials includes numerous creek crossings, dozens of major intersection reconstructions and realignments and purchase of miles of new right-of-way through existing neighborhoods. The cost in dollars could easily be \$150-200 million and the cost in destroyed neighborhoods and lives is immeasurable. All to support this expansion proposal. There is no pot of gold that will magically become available to fund the public costs. Even if the State did appropriate these funds, it would surely come at the expense of waiting and prioritized reconstruction projects elsewhere.

In a reasonable planning process there would be a comparison with all available alternative sites and the more cost efficient would rise to the top. But in this process that cannot happen because the logical alternative area is not even on the list of candidates. That area is undeveloped, similarly zoned farm land which is adjacent to the jobs and to Hwy 26 where the State has already planned for improvements. It is also near the light rail. Off site

transportation improvements could be provided for much less money, probably less than \$50 million. Development of this area could result in a smaller and wiser investment of public and private funds.

Should Oregon change direction from the path created twenty years ago, when the UGB was established, which dictated urbanizing the land that demonstrates the best public investment in infrastructure? That is exactly what is about to happen with the Hillsboro South Urban Reserve Areas, which are an apparent front runner in the contest. A prudent observer would suggest that a reevaluation of sites closer to the jobs is in order. The old saying "Haste makes waste" is true again.

Steve Larrance is a general contractor who is a fourth generation Washington County resident. He has participated in the land use and transportation planning process since the 1970's and was a two term county commissioner and a member of the Hillsboro South Urban Reserve Task Force. He was the chair of the citizens's advisory committee for the Farmington Road widening project in 1981 and co-chair for the 185th Ave. widening project in 1985.

APR 12 1999

Date: April 8, 1999
To: Andy Back, Wa.Co. LUT
Randy McCourt, DKS
From: Steve Larrance
20660 S.W. Kinnaman Rd.
Aloha, Or. 97007
649-3482
Re: Transportation analysis of S. Hillsboro UGB expansion
for Washington County Board of Commissioners

Andy and Randy,

Thanks for this opportunity, early in your analysis, to address some of the issues which I had concerns about after reading the Kittelson and Associates Transportation Report dated 10-29-99 and also contained within the site Concept Plan.

I would request that at the beginning of your report to the Washington County Board of Commissioners you would please address the following:

1. Explain the recent Metro, and not yet accepted by ODOT and most local governments, changes to the minimum level of service standards (2 hours of E&F) and the two hour duration of P.M. peak being the two worst hours of a longer congestion duration. Compare this to the old standard (one hour of D) and explain what the new level looks and acts like at an intersection so the Board can visualize it. Please note how the standards had to "dumb down" to deal with policies in the new Metro 2040 Plan. Do you think that these standards are appropriate? Politically supportable?

2. Explain that the Kittelson Report makes the assumption that it is okay to base their conclusions and recommendations on pretending that the many many unfunded construction projects listed on the Metro Regional Transportation Plan (RTP) are already built. Please list the unfunded total cost of the RTP list and the likelihood of funding any projects in the S. Hillsboro area soon. Also please state the \$500,000,000 existing need within that city identified in the Draft Hillsboro Transportation System Plan (TSP) and any strategies to fund it.

3. On pages 20 and 23 in the Kittelson Report there is a discussion in the second paragraph of the possible T.V. Hiway widening projects recommended by various local governments to address capacity deficiency between Beaverton and Hillsboro. Please explain to the Board the recommendations by the cities and the county and note the difference between Wa.Co.'s (7 lanes west to Brookwood) and Hillsboro's (no change) vision for widening west of 185th Avenue.

4. It appears to me that the Board is very concerned about urban generated trips becoming rural trips south and west of the S. Hillsboro area. Would you speak specifically to the conclusions in the Kittelson Report stating only very minimal trip distribution in this area. Please respond recognizing the rapidly growing usage presently originating in Hillsboro and Aloha on the north going south to work and the likelihood that the 80,000 new jobs in Hillsboro will continue to create more such rural

trips originating in the urban south of our region and traveling to those jobs in the north. In addition note how capacity problems on T.V. Hiway cause other routing.

In addition to the above, I have a couple of requests which I feel would help the Board better visualize your analysis. First, if traffic counts used in your analysis were gathered from the period of mid April to mid November they would best reflect not only the majority of the year but also the typical car - truck mix and volumes associated with Washington County traffic congestion. If you must use winter counts then the Board must be made aware of this decision. And second, could your analysis break down the site to the present pending Metro UGB expansion decision for the West 55 site as adopted by Metro on 12-17-98 (West 55). It is also possible that West 55 could remain as a stand alone expansion without the balance of the S. Hillsboro expansion. Note that this area stops at 234th Avenue on the east, rather than extending to 229th Avenue as shown in the Concept Plan. In this proposal all east/west trips are added to the existing T.V. Hiway. And then separately analyze the complete proposal for 1650 acres with over 20,000 people also from the Concept Plan. This plan proposes the conversion of local collector streets into regional E/W arterials to relieve T.V. Hiway congestion. Since both proposals are being worked on by Hillsboro staff and the developers and are both active proposals before Metro it would be helpful to look at the transportation impacts separately so the Board could better visualize each proposal.

The following are questions and/or requests of you regarding the Kittelson Transportation Report . I have referred to page numbers in the 10-29-98 edition of the report as it is all in one document in that edition. I have included a copy of that edition for your reference. This same information is in the bulky Concept Plan and separate appendices.

1. Are you questioning the "findings and recommendations" in the executive summary on page 1 in the Kittelson Report , such as?:

A. T.V. Hiway "good" through 2015 in present configuration with suggested, but unspecified and untested, access management strategies. It should be noted that in 1984 for the area between 209th Avenue east to 170th Avenue Wa.Co. adopted ordinances mandating extensive access consolidation and other internal block strategies together with a designated local rear access road, Alexander Street, to manage access for capacity and safety benefits. These mandates have been successfully implemented through the development process since adoption. There are very few left turn conflict opportunities because of the parallel railroad R-O-W.

B. The statement that "volumes will increase minimally due to added site traffic" needs to be tested. The Report's conclusions hinge very much on the statements I have listed in A. and B. and they seem to be in opposition to the Transportation Plans of other local governments, Metro and ODOT.

C. The statement "transit service will play a significant role" "in minimizing need for roadway improvements" needs to be tested and substantiated before it can be accepted and used to justify not assigning trips to the off-site road system.

D. The dollar amounts are too low for both on-site road construction costs and in particular for off-site road construction costs. They represent what appears to be a conscious attempt to minimize the off-site costs by not including all impacted roads, not sizing the roads appropriately, not including the costs for right-of-way, sidewalks, street lights, intersections and signals, bridges and wet land mitigation, sound walls and other well established construction costs. In addition, the site percentage of contribution to off-site construction expenses is grossly understated. For example existing local collectors needing extensive widening of pavement and associated costs to become parallel to T.V. Hiway regional arterials solely to serve this proposal are only attributed a 30% cost share to the site.

2. Why is "acceptable" and not "preferred" the operating standard used in the Kittelson Report on page 13? There is no stated justification.

3. Please use the site size, total people living and working and shopping on site and realistic transit usage to assign trip generation and distribution for modeling. Page 15 states site uses and assumptions of on-site employees. How realistic are these assumptions and the trip generation data derived from them?

4. Page 16 states that 30% of peak trips generated will remain on site. This absolutely needs to be justified if it is to be accepted.

5. Page 17 and figure 3 show trip distribution. The 50% going north to work needs justification. Also the minimal amounts going south and west into the rural road system need justification. The trips today accessing the existing neighborhood to the east show a much different distribution.

6. In figure 5 the number of trips added to specific existing roads is listed. Please test those numbers and also the added trips to existing roads which show zero added trips such as 229th near Rosedale, Rosedale, River Road, Farmington and routes over Cooper Mt. to Scholls Ferry Road and beyond.

7. In figure 6, roadway volume-to-capacity ratios with site development is represented. Please test those conclusions. These are now very poorly constructed and narrow roadways with no sidewalks. In addition show the Board the difference between road section capacity vs. intersection capacity. Many of the intersections on these roads are off-set and extremely dangerous and low capacity as configured. And also very expensive to reconstruct as a tee intersection. Please visit and observe.

8. On page 20 please evaluate and explain the use of the description "slightly over capacity condition of westbound T.V. Hiway near 185th Avenue". Adding all of the West 55 proposal's E/W trips to T.V. Hiway cannot be justified. And in the full 1650

acre proposal all of the trips diverted to Blanton west of 185th Avenue are added back at either 170th or 160th, just in the location where even if all the associated projects on the RTP wish list were built the model reads big red in both directions. Please test these. Practically speaking there is not enough room to reconnect Blanton at either location due to the short distance between Blanton and T.V. Hiway.

9. Please evaluate the impact of the proposed parallel Kinnaman Road route on the soon to be completed Farmington Road widening project running east from 170th Avenue. Andy Back's initial modeling indicated that from Kinnaman Road east seven lanes would be needed, meaning the new facility is obsolete. The Board needs to know this.

10. On page 24 in the section about T.V. Hiway please discuss the functional classification (usage) differences between Wa. Co. and Hillsboro's designation for this key connective regional arterial. Also discuss how this paragraph makes the leap from the Draft Hillsboro TSP statement that access management may be successful in extending capacity potential for T.V. Hiway to the Kittelson Report's concluding statement that with access management the existing 20 year demand can be satisfied. And then couple this to the next statement where apparently the Kittelson Report concludes that since the development of the S. Hillsboro 1650 acres will have only a slight impact on T.V. Hiway volumes that it "will not need to be widened beyond its five-lane cross section to accommodate 2015 traffic" even with this total development. Discuss the exact methods of access management envisioned in the Hillsboro TSP statement and the reality of implementing those methods given the existing development.

11. On page 25 there is discussion of trips on rural roads but not rural Farmington Road trips or trips on River Road south of Rosedale Road. What is the likelihood of this usage? What are the impacts on these roads and the many unmentioned rural routes across Cooper Mt. to Scholls Ferry and beyond of extensive use without pavement upgrading?

12. Also on page 25 is discussion of the T.V. Hiway intersection with Witch Hazel Road and with Brookwood Road. How key is the proposed realignment through the school building to the 1650 acre proposal? And to the West 55 proposal?

13. On pages 24-26 and in figure 3 off-site roadway improvements and costs are outlined to mitigate site development impacts. These costs are for construction of pavement only. Will the improvements described totally mitigate the impacts? Are the pavement costs comparable to the values Wa. Co. uses for MSTIP cost analysis? What other roads need to be built or rebuilt and in what configuration? Provide rough cost estimates for total mitigation costs for right-of-way, pavement, sidewalks, curbs, lighting, sound walls, intersections, signals and signs, bridges and wetland mitigation and associated construction and engineering costs without reliance on the RTP project list. The mitigation package may not be able to rely on waiting indefinitely for RTP

funding. Having done this you can then list future RTP commitments for any projects in your mitigation package.

14. I have included my list of road improvements necessary to mitigate that was made part of Metro's 12-17-98 decision record. Do you have any comments on this list and costs?

15. I have also included ODOT's statements for the record for the same proceeding. Please comment on their info.

16. Is the "staging of transportation improvements" as outlined on pages 31-32 sufficient to allow for a "no further degradation of existing levels of service for the existing trips" scenario to occur? Shouldn't some capacity for development truck and worker access be created before development even starts? No mention is made of improvements to rural routes so presumably that would not be necessary until complete build out. This seems odd because it is possible for rock trucks from Cooper Mt. quarries to use an entirely rural road route, especially to the West 55 proposal .

17. On page 33 "relationship to other program/policies" is discussed. No mention is made of being consistent with the Wa. Co. Plan. Is it? Remember the different classification for T.V. Hiway and the drastic changes in function for the local type collectors which become the parallel regional arterial route to T.V. Hiway.

18. Also in this relationship section under the Transportation Rule the Kittelson Report claims consistency through "designating transportation improvements that are fundable". Given that the Hillsboro Planning Director is on the record telling his Planning Commission that there will most likely be zero on-site derived Traffic Impact Fee funds available for off-site improvements and that the report doesn't fund even the pavement only costs of the incomplete proposed mitigation improvements package, do you feel that a "fundable" and complete improvement package is being proposed in the Concept Plan for either the West 55 proposal or for the 1650 acre proposal?

19. On page 35 in "c." can you identify the "factors" and are you satisfied that they were applied correctly to the one hour peak travel forecast to prove that the Metro standards, which are E and F, are met everywhere except on T.V. Hiway immediately east of 185th Avenue?

cc.

Tom Brian
Charlie Cameron
Bruce Warner
Jim Sitzman
Rod Monroe
Tom Lancaster

Date: 5-12-99

To: Hillsboro Planning Commission

From: CAIG Citizens Against Irresponsible Growth

Steve Larrance

20660 S.W. Kinnaman Road

Aloha, Or. 97007

Re: Testimony regarding Hillsboro Transportation System Plan

Thanks for this opportunity to address the draft Transportation System Plan. We believe, as you do, that provision of adequate transportation facilities is one of the most important urban services and indeed THE service that average citizens feel most effects them daily. While it may not be the most important urban service that the city of Hillsboro and other governments provide it is the most expensive to provide. For that reason we feel it is extremely important to invest wisely in future systems. This Transportation System Plan will provide the vehicle for the city to cause our future system to be implemented and the rationale to require a land owner to surrender their property for public rights-of-way during the development process.

It is extremely important that the plan foresees the correct quantity and location for the necessary facilities. That has not occurred in the past. If any city in Washington County will grow, certainly Hillsboro will lead the way. As more vehicle trips are generated within the existing city the existing roadways will need to be upgraded to provide an acceptable level of service. Also as dense new urban areas are added to the perimeter the existing facilities will again need to be upgraded to provide the route for some of these new arterial trips. And in addition as cross county through trips continue to grow, as Hillsboro provides a higher and higher percentage of employments opportunities, this transportation plan will need to respond to that need with more north/south principal arterials if not a freeway.

We support this planning effort to spell out the need for proper connectivity and level of service and to link it to livability. We would add that the electorate appears to support at the ballot box (MSTIP) those projects providing high levels of both straight forward connectivity and level of service.

The following list of examples is intended to represent the types of streets and management techniques for a future system which ought to be outlined in more depth in this proposed plan if the plan is to be the city's primary development tool:

1. Adequately foresee the far future needs for rights-of-way. The time to secure that property is at the time of development although the entire facility may not be built for some time. This is especially true at intersections where most level of service failures occur.
2. Address connectivity in as direct a manner as possible. Curves are sometimes necessary but straight lines are many times much less costly and more effective. Avoid off-set intersections at all costs. Especially when an arterial is to be crossed, relying on offset intersections destroys the capacity of the arterial by using the arterial's space and time duration. In the very recent past the city has called for this very error

at several crossings of Cornelius Pass Road, such as the new Cherry Lane extension. That is an expensive and critical error as that portion of Cornelius Pass Road may someday become a limited access facility of some kind. Intersection spacing is critical if expensive and expansive frontage road systems are to be avoided.

3. Stick to the requirements of proper access management during the development process. The capacity of many existing arterials has been even recently compromised due to poor implementation of common sense access management policy.

4. It is absolutely critical to not rely on "paper plans" for future roadway improvements to give the green light to proposed developments. Just because an improvement is on Metro's RTP wish list of projects does not mean it will ever be built. That list is constantly being added to and a newer more politically popular project may supersede older projects. In addition only a small percentage of the listed projects will EVER be funded and completed. In my mind evolving that list is one of the two most dangerous policies of late. The city needs to work with the region to develop a more realistic list of projects based upon actual funding commitments. The city also needs to develop other local lists to begin a local funding system for both city-wide arterials and another for more local needs.

5. "Dumbing down" the minimum level of service to two hours of E&F as Metro is now advocating is the other extremely dangerous policy. Sitting through more than a couple signal changes at each signal along a route is more than most people will tolerate. By adopting such a standard all credibility will be lost. As mentioned in the previous 4. the public must be "sold" on a dollar amount to support their necessary improvements so credibility is an absolute must. They will not pay more money to sit at signals for that long.

6. The T.V. Hiway must not be lost. There are several plans, one written some not, being circulated about "improvements" to this critical principal arterial. One very radical Metro proposal (which is attached) is on the RTP "wish list" with no private property access. It is now being used to show incredible capacity capability so that a rationalization for the proposed UGB amendments in S. Hillsboro can be made a part of Metro's record of the decision. Mean while very recent Metro presentations to the Chamber of Commerce have included at-grade intersections which would drastically cut capacity, but are more politically possible. This is a very dangerous practice which flies in the face of credibility.

This plan points out that access management can net small capacity improvements. Access management was implemented in 1985 by Washington County to save as much capacity for as long as possible. The city needs to add all aspects of that county plan to this Transportation System Plan now.

Respectfully submitted,

M E M O R A N D U M

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METRO

DATE: April 6, 1999
TO: Andy Back, Washington County
FROM: Tom Kloster, Metro *TK*
SUBJECT: Tualatin Valley Highway Model Refinements

* * * * *

This is a follow-up to our recent discussions regarding model refinements for the TV Highway Corridor. We are aware that the County is undertaking a transportation study of the South Hillsboro Urban Reserve, and the study is using the round 2 RTP strategic system for a basis of the analysis.

As we've previously discussed, the Round 2 modeling included a capacity of 6000 vehicles per hour in each direction. This probably over-estimates the kind of facility we are envisioning as part of the Strategic System, and, at this time we anticipate reducing the capacity to 4500 vehicles per hour in each direction as part of Round 3.

As you move forward with the South Hillsboro Urban Reserve analysis, here are some recommended changes to be made to the Round 2 strategic system that we will be using in our final round of RTP modeling:

1. Capacity of 4500 in each direction between Murray and Century Drive.
2. Capacity of 3400 between Century and Brookwood and Murray and Hocken (this is intended to provide a transition between the 6 lane limited access facility and the 5 lane arterial at either end).
3. "Interchange-like" treatments at Murray, 185th and Cornelius Pass
4. Four or five flyovers or underpasses at various minor arterial/major collector locations such as Century Blvd., 198th and 170th .
5. Five or Six "right-in/right out" locations on both the north and south side of the Highway.
6. Generally, there shouldn't be any centroid connectors to the Highway itself.

We recognize that these modeling changes do not represent a policy choice for TV Highway, and have recommended in the draft RTP findings that a more detailed study be conducted to identify specific improvements for this corridor. However, we do believe it's important that the South Hillsboro Urban Reserve study reflect Metro's latest approach to modeling TV Highway as part of the RTP Strategic System.

Goal 3: Access Management

To employ access management strategies to ensure safe and efficient highways consistent with their determined function, ensure the statewide movement of goods and services, enhance community livability and support planned development patterns, while recognizing the needs of motor vehicles, transit, pedestrians and bicyclists.

Overview

Access Management is balancing *access* to developed land while ensuring *movement* of traffic in a safe and efficient manner. To achieve effective transportation it is necessary to have a blend and balance of road facilities. Each performs its unique function, since no single class of highway can provide both high levels of movement and high levels of access to property. The spectrum ranges from freeways that provide for ease of movement through higher speeds, higher capacity and freedom from interruption, to local residential streets that provide for ease of access through slow speeds and numerous driveways which serve a diverse group of users from pedestrians to garbage collectors and emergency response vehicles.

Because expanding population growth and transportation needs are placing increasing demands on the state highway system, there is intense pressure to allow businesses and individuals extensive access to the roadway. The challenge is to determine how to best apply techniques on Oregon's state highway system that will safely protect the highway efficiency and investment, contribute to the health of Oregon's local, regional and statewide economies, and support and maintain livable communities.

Implementation of access management is essential if the safety, efficiency and investment of the existing and planned state highways are to be protected. Implementation can also reduce congestion, accidents, delays, air pollution and energy consumption.

Scope of the Policies

The standards, guidelines and criteria in the access management policies shall be applied to the development of all ODOT projects and incorporated into all ODOT planning processes, including corridor studies, refinement plans and state and local transportation system plans, as well as local comprehensive plans.

(Note: Policy detail and definition of terms can be found in the complete Access Management Policy Document, Appendix B.)

Policy 3A: Classification and Spacing Standards

It is the policy of the State of Oregon to manage the location, spacing and type of street intersections, approach roads, median openings and traffic signals on state highways.

Action 3A.1

Manage access to state highways based on the following access management classifications:

- Freeways (NHS):
 - Interstate Freeways (NHS)
 - Non-Interstate Freeways (NHS)
- Limited Access Highways (NHS)
- Statewide Highways (NHS)
- Regional Highways
- District Highways and Local Interest Roads

Action 3A.2

Establish spacing standards on state highways based on highway classification, type of area, speed and number of lanes on the facility.

Action 3A.3

Control traffic signal placement on state highways to maximize public safety and manage efficient operation of the system.

Policy 3B: Medians

It is the policy of the State of Oregon to manage the placement of medians and the location of median openings on state highways to enhance the efficiency and safety of the highways, and influence and support land use development patterns that are consistent with approved Transportation System Plans.

Action 3B.1

Design and construct non-traversable medians for:

- All new multi-lane highways;
- Modernization of multi-lane highways which are:
 - Limited Access (NHS)
 - Statewide (NHS) highways; and
 - Regional highways where posted speeds are 70 km/h (45 mph) or greater.

Action 3B.2

Consider construction of non-traversable medians on highways not undergoing modernization where a median could improve safety.

Action 3B.3

Restrict full median openings and directional median openings to locations that conform to ODOT's spacing standards.

Action 3B.4

Except on freeways, consider using raised median pedestrian refuge islands and signalized mid-block crosswalks in urban areas that are pedestrian and/or transit oriented.

Policy 3C: Interchange Access Management Areas

It is the policy of the State of Oregon to manage grade-separated interchange areas to ensure safe and efficient operation between connecting highways.

Action 3C.1

Improve an existing interchange or construct a new interchange only when necessary supporting improvements, such as road networks, channelization, medians and access control, in the interchange management area are identified in the local comprehensive plan and are committed or in place.

Action 3C.2

Consider the need for transit and park and ride facilities, along with the effect on pedestrian and bicycle traffic, in the design of urban interchanges.

Action 3C.3

Control the access to cross streets consistent with established standards for a distance on either side of the ramp connections so as to reduce conflicts and manage ramp operations.

Action 3C.4

Connect interchanges to major or minor arterials, supported by adequate street networks with the necessary frontage roads, cross streets, channelization, traffic controls and access control to ensure the longevity and efficiency of the interchange.

Action 3C.5

Use grade-separated crossings *without* connecting ramps to provide crossing corridors that relieve traffic crossing demands through interchanges.

Policy 3D: Variance Policy and Procedures

It is the policy of the State of Oregon to manage requests for minor and major deviations from adopted access management standards and policies through an application and appeals process to ensure statewide consistency.

Action 3D.1

Implement a variance procedure by which an applicant may request consideration of a minor or major deviation from access management standards and policies.

Action 3D.2

Establish Region Access Management Coordinators for, or delegate to District Managers, the review and action on variance requests for minor deviations from access management standards and policies.

Action 3D.3

Establish Region Variance Committees to review and act on variance requests for major deviations and appeals of denied requests for minor deviations.

Action 3D.4

Outline the criteria which the Region Access Management Coordinators or District Managers and the Region Variance Committees shall consider when reviewing variance requests.

Action 3D.5

Implement an appeals process by which an applicant may request further consideration of a denied variance request through both the Region Variance Committee and ODOT's Administrative Hearings Procedure.

APPENDIX B ACCESS MANAGEMENT POLICY

Background and Purpose

The people of Oregon have an enormous investment in their state highway system. At one time highways could link the state's activity centers to each other and serve as "Main Streets" for communities, facilitating roadside development. This is no longer the case. Highways are costing more to construct, and poor access management in the past has made it necessary to build new bypasses when old bypasses have become congested because of new development along the route. This presents a sizable challenge to protecting the system and maintaining reasonable levels of service for users. The Oregon Transportation Commission is looking for more cost-effective ways to respond to this challenge.

Several factors, including the number, spacing, type and location of accesses, intersections, and traffic signals have a significant effect on the capacity, speed, safety and general operational efficiency of the highway. These factors need to be effectively managed in order to operate the highway system safely, at reasonable levels of service and in a cost-effective manner. Collectively these factors comprise access management.

This policy also provides a framework for making access decisions which will be consistent with the function and operating levels of service identified in the Level of Importance Policy. It will be used by the OSHD to carry out its responsibilities for managing access under statutes and administrative rules. It will also be used by the division to guide the design of highways and coordination with local comprehensive planning.

Policy

The Oregon Transportation Commission recognizes the importance of an effective access policy in managing and protecting the system of state highways. The access management categories listed in Table 1 were developed to assist the OSHD in achieving effective access management. They are to be applied to all sections of the state highway system in accordance with procedures that appear below.

Standards were developed for each category to ensure that all state highways will continue to function safely and efficiently consistent with the Level of Importance Policy. These standards, covered in Table 2, will be applied to OSHD's access management, operation, design and local planning coordination actions in accordance with the following:

1. The existing connections, median openings and traffic signal spacings of a highway segment are not required to meet the spacing standards of the assigned category at the time of assignment. The assigned category provides a mechanism for improving a highway to its eventual functional purpose. The use of existing permitted connections, not conforming to the standards, will continue to be allowed, unless a traffic problem develops. However, such features shall be modified or removed as changes to the property use or roadway design allow.
2. The access management category standards represent minimums for each access. More stringent levels of access management will



- be retained where they already exist. For engineering design reasons, the minimum distances for spacings may have to be greater than those specified in Table 2. Examples include the need for auxiliary lanes and additional storage. Traffic signals may be spaced at intervals that vary from the specific standards to optimize capacity and safety.
3. The OSHD, in cooperation with the appropriate local governmental entity, may enact different standards to meet the requirements of the Level of Importance policy and this policy through the adoption of individual corridor access management plans. Local government agencies affected by these access management plans will be notified and their input requested.
 4. Although this policy focuses on new and emerging areas, it is meant also to encourage "retrofitting" problem areas with better access management plans in cooperation with local governments.
 5. A permit may be issued for a single connection to a property that cannot be accessed consistent with the highway access spacing standards and either has no reasonable access or cannot obtain reasonable alternative access to the public road system. In such cases the design of the access should be done so as to be consistent with the level of service standards in the Level of Importance Policy. The permit should also carry a condition that the access be closed at such time that reasonable access becomes available to a local public street.
 6. Single ownership properties with frontage exceeding the minimum spacing standards shall not be permitted the total number of connections, median openings or traffic signals possible based on the spacing standards. The total number of connections permitted shall be the minimum necessary to provide reasonable access based on operational, safety and functional integrity considerations for the highway.
 7. Connections permitted in accordance with this policy shall be designed and managed to be consistent with the function and purpose of the state highways as presented in this and other policies, and to operate safely, efficiently and cost effectively.
 8. In conjunction with major improvements to interstate, statewide or regional highways in rural areas, access will be managed to be consistent with the requirements of Statewide Planning Goals 11 and 14 and administrative rules adopted by the Land Conservation and Development Commission to carry out those goals. Major improvements include major realignments, the addition of travel lanes and new interchanges and intersections.
 9. Spacing at less than distances shown will only be considered where safety and operational effectiveness can be retained or improved based on clear traffic analysis evidence. Such situations must be assessed for long-term future performance and cannot create a precedent which will lessen the effect of the general spacing standard. Generally, consideration will only be given where there is median control.

Assignment of Access Management Categories

Access management categories will be assigned to all sections of the state highway system to ensure that the Level of Importance Policy and this policy are effectively carried out. The assignments will be based on this policy (including descriptions in Table 1 and Table 2), be consistent with the classification of the highway, and be adequate to meet the operating level of service standard which applies to the highway section. These determinations shall be based on projected cumulative effects of highway access considering projected future traffic volumes and the amounts of development authorized by comprehensive plans



of affected local governments. The following factors will also be considered when making assignments:

- Existing and proposed roadside development patterns;
- Regional and local transportation system plans and comprehensive plans;
- The potential for increasing the use of local roads to provide property access and local circulation;
- Topography, drainage or other land characteristics;
- Existing access agreements between OSHD and local jurisdictions;
- Other operational aspects of access.

Access management categories will ordinarily be

applied in conjunction with the development of highway corridor plans. They may also be applied for shorter segments of highway corridors in coordination with affected local governments. The division will follow the procedures in the department's State Agency Coordination Program for coordinating facility planning to assure that access management categories are assigned in a manner compatible with comprehensive plans of affected local governments.

Prior to the assignment of access management categories, the department will apply the policy to the review of road approach permits, project design, and local land use planning actions. The respective coordination procedures contained in the department's State Agency Coordination Program will be followed.



TABLE 1 HIGHWAY ACCESS MANAGEMENT CATEGORIES

Category 1:

These highway segments provide for efficient and safe high speed and high volume traffic movements, on interstate, interregional, intercity, and some intracity routes in the largest urbanized areas. The segments do not provide direct land access. Access control and other methods will be used on nearby cross streets in the area of interchanges to protect the operation of those interchanges. This category will apply to all interstate highways and other highways that function like freeways.

Category 2:

These highway segments provide for efficient and safe high speed and high volume traffic movements, on interstate, interregional, intercity and longer distance intracity routes. They should not provide direct land access. This category is distinguished by highly controlled connections, and medians. Traffic signals should be avoided and where they must be installed, their effect on mainline traffic flow should be minimized. Grade separations should be considered for high volume cross streets or other cases where signals are not appropriate. Some category 2 facilities may be developed into category 1 facilities over time. This category includes many of the statewide facilities.

Category 3:

These highway segments provide for efficient and safe medium to high speed and medium to high volume traffic movements, on interregional, intercity and longer distance intracity routes. The segments are appropriate for areas which have some dependence on the highway to serve land access and

where financial and social costs of attaining full access control would substantially exceed benefits. This category includes some of the statewide facilities.

Category 4:

These highway segments provide for efficient and safe medium to high speed and medium to high volume traffic movements, on higher function interregional and intercity highway segments. They also may carry significant volumes of longer distance intracity trips. They are appropriate for routes passing through areas which have moderate dependence on the highway to serve land access and where the financial and social costs of attaining full access control would substantially exceed benefits. This category includes a small part of the statewide facilities and most regional facilities.

Category 5:

These highway segments provide for efficient and safe medium speed and medium to high-volume traffic movements, on intercity, intracity and intercommunity routes. There is a reasonable balance between direct access and mobility needs within this category.

Category 6:

These highway segments provide for efficient and safe slower to medium speed and low to high-volume traffic movements, on intracity and intercommunity routes. This category will be assigned only where there is little value in providing for high speed travel. Providing for reasonable and safe access to abutting property is a major purpose of this access category.

ACCESS MANAGEMENT CLASSIFICATION SYSTEM

Category	Access Treatment	LOI (1)	Urban/ Rural	Intersection				Signal Spacing (4)	Median Control
				Public Road		Private Drive (3)			
				Type (2)	Spacing	Type	Spacing		
1	Full Control (Freeway)	Interstate/ Statewide	U	Interchange	2-3 Mi.	None	NA	None	Full
			R	Interchange	3-8 Mi.	None	NA	None	Full
2	Full Control (Expressway)	Statewide	U	At grade/Intch	1/2-2 Mi.	None	NA	1/2-2 Mi.	Full
			R	At grade/Intch	1-5 Mi.	None	NA	None (5)	Full
3	Limited Control (Expressway)	Statewide	U	At grade/Intch	1/2-1 Mi.	Rt. Turns	800'	1/2-1 Mi.	Partial
			R	At grade/Intch	1-3 Mi.	Rt. Turns	1200'	None (5)	Partial (6)
4	Limited Control	Statewide/ Regional	U	At grade/Intch	1/4 Mi.	Lt./Rt. Turns	500'	1/2 Mi.	Partial/None (7)
			R	At grade/Intch	1 Mi.	Lt./Rt. Turns	1200'	None (5)	Partial/None (7)
5	Partial Control	Regional/ District	U	At grade	1/4 Mi.	Lt./Rt. Turns	300'	1/4 Mi.	None
			R	At grade	1/2 Mi.	Lt./Rt. Turns	500'	1/2 Mi.	None
6	Partial Control	District	U	At grade	500'	Lt./Rt. Turns	150'	1/4 Mi.	None
			R	At grade	1/4 Mi.	Lt./Rt. Turns	300'	1/2 Mi.	None

Notes:

- 1) The Level of Importance (LOI) to which the Access Category will generally correspond. In cases where the access category is higher than the Level of Importance calls for, existing levels of access control will not be reduced.
- 2) The basic intersection design options are as listed. Special treatments may be considered in other than category 1. These include partial interchanges, jughandles, etc. The decision on design should be based on function of the highway, traffic engineering, cost-effectiveness and need to protect the highway. Interchanges must conform to the interchange policy.
- 3) Generally, no signals will be allowed at private access points on statewide and regional highways. If warrants are met, alternatives to signals should be investigated, including median closing. Spacing between private access points is to be determined by acceleration needs to achieve 70 percent of facility operating speed. Allowed moves and spacing requirements may be more restrictive than those shown to optimize capacity and safety.
- 4) Generally, signals should be spaced to minimize delay and disruptions to through traffic. Signals may be spaced at intervals closer than those shown to optimize capacity and safety.
- 5) In some instances, signals may need to be installed. Prior to deciding on a signal, other alternatives should be examined. The design should minimize the effect of the signal on through traffic by establishing spacing to optimize progression. Long-range plans for the facility should be directed at ways to eliminate the need for the signal in the future.
- 6) Partial median control will allow some well-defined and channelized breaks in the physical median barrier. These can be allowed between intersections if no deterioration of highway operation will result.
- 7) Use of physical median barrier can be interspersed with segments of continuous left-turn lane or, if demand is light, no median at all.



METRO

Regional Transportation Plan

Adoption Timeline

Post-it® Fax Note 7671

To *Larry Derr*
 Co/Dept.
 Phone #
 Fax # *228-0171*

1999	April	RTP Round 2 modeling completed TPAC workshops to review final projects, system performance Joint JPACT & MPAC workshop to review final RTP findings and recommendations
	May	
	June	Draft RTP Resolution Kit provided to JPACT, MPAC and Council Transportation Committee
	July	JPACT and MPAC recommendations for RTP Resolution Council Resolution on draft RTP policies, projects and financial requirements
	August	Draft RTP document prepared based on Council resolution Draft RTP released for public comment; 45-day comment period begins
	September	
	October	JPACT and MPAC review of public comments on draft RTP Council hearings on draft RTP
	November	JPACT and MPAC recommendations for RTP adoption Council adoption of RTP by Ordinance
	December	One-year compliance timeline begins for compliance with state and regional plans

Date *6/7* # of pages *1*
 From *Larry Shaw*
 Co *Metro*
 Phone #
 Fax #

RTP Resolution Decision Kit

Subarea Tabloids

The subarea tabloids describe the proposed 20-year transportation plan in detail for each of the seven RTP subareas that cover the region.

Each subarea tabloid includes analysis highlights for the subarea, proposed strategic projects, timing of proposed improvements and a series of maps that provide both analysis information and the location of proposed projects within the subarea.

The subarea tabloids will be produced in quantity, and will serve as the main public outreach tool during the RTP adoption period. The maps will also be incorporated into the "official" RTP draft document following approval of the RTP resolution.

Policy Chapter

The policy chapter was approved by resolution in July 1996, and has served as the "recipe" for developing an updated, 20-year plan for transportation improvements tied to the 2040 Growth Concept. Since 1996, the policy chapter has been incorporated into the Regional

Framework Plan, and the RTP system maps have been adopted. The Resolution Decision Kit will include an updated policy chapter that incorporates some proposed framework plan revisions and the RTP system maps.

Strategic and Preferred System Improvements

In addition to the "user friendly" description of strategic system improvements contained in the subarea packets, the RTP Resolution Decision Kit will include a detailed list of proposed strategic and preferred system improvements, including project costs. These projects will be incorporated into the draft RTP document to be released for public comment following approval of the resolution.

Financial Plan

The final piece of the Resolution Decision Kit is a financial analysis that outlines existing revenues, future revenue shortfalls and a possible strategy for meeting anticipated revenue needs. The financial analysis will be incorporated into the draft RTP document following approval of the resolution.



Oregon

John A. Kitzhaber, M.D., Governor

Department of Land Conservation and Development

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June 2, 1999



TO: Land Conservation and Development Commission

FROM: Richard P. Benner, Director SUBJECT: **Agenda Item 5, June 25, 1999 LCDC Meeting****Work Session on Metro Regional Framework Plan****RECOMMENDATION**

No final actions are recommended for this meeting. However, Commission discussion of several matters covered in this report may result in direction to the Department that will facilitate the later acknowledgment review. Matters for discussion affect review standards and processes as well as issues contained in Framework Plan policies. They include:

- Are the processes and standards for review of "goals and objectives" the same as or different from those for "plan policies"?
- Are the processes and standards for review of "plan elements" the same as or different from those for a "comprehensive plan"? Can there be serial acknowledgments of a regional framework plan elements?
- How, if at all, does a regional partnership with 24 cities and 3 counties affect the implementation of plan policies?
- Should or how does Metro's "cutting-edge" regional planning influence or alter acknowledgment?
- What constitutes a plan element that is ready for acknowledgment: using a housing example?

- What are the implications of recognizing "market-based preferences" in housing; provision of public facilities and services concurrent with the "pace of growth"; sub-regional balance of jobs and housing; and other issues drawn from Framework Plan policies?

INTRODUCTION

This report is preliminary to the standard acknowledgment report that is expected to be prepared for the Commission's August meeting. The first purpose of this report is to provide an overview and background discussion of Metro's Framework Plan. Why is the Department using a different review procedure? What is the Framework Plan? Where does it fit in Metro's overall planning program and authority? How should the Framework Plan be reviewed for compliance acknowledgment? When will acknowledgment reviews be scheduled?

By addressing the questions above the Department expects to build familiarity and a degree of comfort with the Metro Framework Plan and the context within which it is set. And we hope to gain general guidance from the Commission discussion about how to proceed on the matters identified in and by this report.

A second purpose is to discuss a few of the Framework Plan policies for following reasons.

- 1) Further appreciation of Metro's contribution to planning in the region and state.
- 2) Note the potential for Metro policy conflicts with statewide goals.
- 3) Pass on to Metro points for clarification or correction.

PART ONE: OVERVIEW AND BACKGROUND

Why Use a Different Review Procedure

The Department decided to follow a different review procedure because Metro and the Framework Plan are quite unlike what the Commission has encountered in other acknowledgment reviews. Furthermore, even though the Commission dealt with some of these differences when Metro's Regional Urban Growth Goals and Objectives (RUGGOs) were presented for acknowledgment, changes have been made in the content and placement of the RUGGOs.

With this preliminary look at the Framework Plan, the Commission can better understand what is presented for acknowledgment and begin to gauge how to view and address the material presented. The following discussion includes

observations and questions concerning certain Metro policies that should help the Commission understand Metro's planning program.

The Metro program has added significantly to urban land use planning in the Portland Metropolitan area. In so doing it has enlarged upon the standards of earlier Commission acknowledgments. The discussion that the Departments hopes to facilitate with this report should set an appreciation overall of Metro's contributions and perhaps challenge some of their components.

In addition to DLCD staff, representatives of Metro are expected to be in attendance to participate in these discussions.

What Is the Framework Plan?

The Regional Framework Plan is a requirement of the Metro Charter. It comports with Metro's "Future Vision", also required by The Charter.

The Charter provides that the Framework Plan "...shall address: (1) regional transportation and mass transit systems, (2) management and amendment of the urban growth boundary, (3) protection of lands outside the urban growth boundary for natural resource, future urban or other uses, (4) housing densities, (5) urban design and settlement patterns, (6) parks, open spaces and recreational facilities, (7) water sources and storage, (8) coordination, to the extent feasible, of Metro growth management and land use planning policies with those of Clark County, Washington, and (9) planning responsibilities mandated by state law.

The Framework Plan also may address other growth management and planning policies determined to be of metropolitan concern. The Framework Plan is required by the Charter to comply with applicable statewide planning goals, be subject to compliance acknowledgment and be the basis for coordination of local comprehensive plans and implementing regulations.

Metro elected to incorporate the RUGGOs required by ORS 268.380 in the Framework Plan, a matter addressed later in this report. Of considerable note, the 2040 Growth Concept is part of the RUGGOs.

Where Does the Framework Plan Fit in LCDC and Metro's Overall Planning Program and Authority?

The Commission's authority to review the Framework Plan for acknowledgment is ORS 197.274: "The Metro regional framework plan and Metro planning goals and objectives are subject to review:

- (1) For compliance with the statewide planning goals in the same manner as a comprehensive plan for purposes of:
 - (a) Acknowledgment of compliance with the goals under ORS 197.251".

Metro has submitted a request for acknowledgment pursuant to the statutes and OAR 660 Division 03.

Although subject to review "in the same manner" as a comprehensive plan, the Framework Plan is not a comprehensive plan. It is a compilation of several planning elements. Specific Metro planning elements are required by three separate authorities: ORS 197, ORS 268 and the Metro Charter. In addition, Metro is given discretion to select other elements of regional planning. These authorities and planning responsibilities are outlined in Tables A-1 and A-2, "Metro Role in Land Use Planning" and "The Regional Framework Plan" (See Attachment A). Metro designed the Framework Plan to integrate these planning elements in a single document. Several supporting documents are included in an appendix to the Framework Plan.

The "element" rather than comprehensive character of Metro's planning function necessitates a delineation of the planning elements in relationship to their primary applicable statewide goals. This delineation is portrayed in Table B (See Attachment A). As with other compliance reviews, it is recognized that in the planning process balancing and tradeoffs occur among the values and purposes of competing goals. This Table will help reader understand the scope and complexity of the Framework Plan elements.

A question for Commission discussion is the distinction, if any, between acknowledging goals/objectives and acknowledging plan policies. State Law (ORS 268.380) requires Metro to adopt regional goals and objectives. Metro's Charter requires preparation and adoption of a Regional Framework Plan. As mentioned above, both the goals and objectives and the framework plan are subject to Commission acknowledgment (ORS 197.274).

Metro adopted goals and objectives first and labeled them regional growth management goals and objectives (RUGGOs). The Commission subsequently reviewed and acknowledged the RUGGOs for consistency with the Statewide planning goals. This consistency review looked at the RUGGOs as general, "stand alone" goals and objectives similar at a regional scale to the statewide goals of LCDC.

During preparation of the Regional Framework Plan, Metro incorporated the acknowledged RUGGOs, plus new goals and objectives, and labeled them plan policies. Metro counsel explained during this review that ultimately, perhaps soon, the RUGGOs as a stand-alone document will be eliminated. Metro will then cite to the Framework Plan policies for evidence that the requirement of ORS. 268.380 has been fulfilled.

The question this shift raises is whether the earlier finding that Metro's goals and objectives are **consistent** with statewide goals is the same as finding that the goals and objectives when converted to plan policies **comply** with statewide goals? Asked differently, do the goals and objectives make sufficiently clear and specific policy decisions that can be implemented in some manner?

The statewide planning goals have repeatedly been refined by local policy decisions through local planning processes. These decisions are typically pointed enough that appropriate implementing measures can be devised. The Commission's acknowledgment of the RUGGOs accommodated a similar process within Metro, wherein later Metro plan elements including policies could be weighed against the acknowledged RUGGOs. Does bringing the regional goals and objectives into the Framework Plan as plan policies change the nature of the Commission's review? If the answer were yes, then the goals and objectives acknowledged earlier would become subject to a new review as plan policies. This result would be consistent with the fact that Metro submitted the Framework Plan with the RUGGOs incorporated for acknowledgment review.

As a practical matter then, a determination needs to be made about which policies in the Framework Plan are to be reviewed and by which standard (consistency or compliance). Some choices are:

- 1) During Framework Plan acknowledgment, omit review of previously acknowledged RUGGOs that appear as Framework Plan policies but continue to review new Framework Plan policies for **consistency** with statewide goals.
- 2) Review Framework Plan policies for **compliance** with the statewide goals as part of this and future acknowledgment requests as the policy component of whole plan elements.
- 3) Review Framework Plan policies initially for **consistency** as done with the RUGGOs and confirm **compliance** later when reviewed as the policy component of whole plan elements.
- 4) Review Framework Plan policies for **consistency** as though parts of an amendment considering only changes and additions by requiring that a post-acknowledgment notice be filed.

How Should the Framework Plan Be Reviewed for Compliance Acknowledgment?

Historically, Commission plan acknowledgment reviews required that three types of material be submitted for review: 1) background documentation containing information, data and analyses that supports, 2) local government policy choices that are carried out by, 3) adequate implementing measures. In the Commission's acknowledgment of the Metro Regional Urban Growth Goals and Objectives (RUGGOs) only general policy content, with supporting documentation, was reviewed for consistency with the Statewide Planning Goals.

This Framework Plan review, if it follows previous Commission practice, must consider the compliance of policies, the substantiality of Plan background documentation supporting the policy choices and the adequacy of implementing measures. So, while review of the Framework Plan is not a review of a comprehensive plan, it is a review of *whole plan elements* that are typical of a comprehensive plan. A *whole plan element* for the purpose of this review is a compilation of background documentation, plan policies and implementing measures.

A decision to review whole plan elements leads to a need for more than one Commission review session. Of the seven Framework Plan chapters, only one and portions of another are presently whole plan elements. The June Commission meeting is scheduled for the purposes stated in this report, with no formal action requested of the Commission. However, the Department will look for guidance in the Commission's discussion about reviewing only whole plan elements.

When Will Acknowledgment Reviews Be Scheduled?

Based on a practice of reviewing whole plan elements, the August Commission meeting is schedule for acknowledgment review of Chapter 1 Land Use, except for the housing portion of this chapter and Chapter 7 Management. TABLE C projects a tentative overall time frame for Commission reviews.

TABLE C: Acknowledgment Review Schedule

<u>Plan Element</u>	<u>Schedule for Review</u>
1. 2040 Growth Concept and Land Use (Minus Housing & Affordable Housing)	August 1999
Framework Plan Policies (for consistency)	August 1999
2. Housing and Affordable Housing	Unknown
3. Transportation	2nd-3rd Quarter of 2000

4. Parks, Natural Areas, Open Spaces and Recreational Facilities	Unknown
5. Water	Unknown
6. Regional Natural Hazards	Unknown
7. Clark County	Unknown
8. Management	August 1999
9. Implementation	Occurs With Each Elements

PART TWO: COMMENTS ABOUT FRAMEWORK PLAN POLICIES

When the RUGGOs were acknowledged the Commission found them to be consistent with the statewide goals. Consistency was defined to mean: the goals and objectives **do not a) require something in conflict with the applicable statewide planning goals nor b) prohibit something required by the applicable statewide planning goals.** If the Commission conducts review of the Framework Plan policies in the same manner as the review of the RUGGOs was conducted, then this review would consider the policies in the Framework Plan for consistency with the Statewide planning goals. However, if the Commission determines that review of plan policies differs from review of the RUGGOs, then the review would focus more on ascertaining the precision and "ultimate choice" required of plan policies. And, of course, on whether the policies comply with applicable statewide goals.

The Framework Plan uses in the policies both terms that are mandatory ("shall", "will") and terms that suggest or state a preference ("should"). The intentional difference is that Metro obligates itself to address the mandatory policies in contrast to Metro retaining the choice of whether or not to address policies that suggest or prefer. Keeping this distinction in mind will aid the reader's understanding of the policies. For greatest clarity, when reading the following statements, please reference the text of Framework Plan policies reproduced in this report in **Attachment B.**

Regional planning at Metro does not stem only from its various authorities. Cooperation and coordination involving member cities, counties and districts are paramount to successful regional planning.

Regional planning under Oregon statutes and the Metro Charter, including governance by a directly elected council, is singularly unique in the United States. However, while this system embeds considerable authority in the regional government, speaking practically Metro relies heavily upon building partnerships with the cities, counties and special districts within its region. These partnerships are evident even when Metro employs its authority to *require* local governments to implement regional policies. Typically a Metro *requirement* reflects a point of consensus or strong plurality among local governments. Mutually applying the "art of the possible" dominates over "ruling through exercise of

authority" in the relationship between Metro and its cities and counties. This reality shapes the implementing measures adopted by Metro and is therefore a factor to be considered in the LCDC review of these measures.

The 2040 Growth Concept Chapter

Metro's 2040 Growth Concept (The Concept) is a component of the RUGGOs. It is now also the lead chapter in the Framework Plan and, as a consequence, a major body of plan policy. In just over twelve pages of narrative no specific policies are enumerated. However, policies that can be gleaned readily from the text are summarized here.

- Preserve access to nature
- Build better communities for people today and in the future
- Coordinate land uses with a multi-modal transportation system
- Reduce sprawl in the transition from urban to rural uses
- Create mixed-use urban centers inside the UGB
- Inter-relate a variety of centers by size and type
- Strive for sub-regional jobs-housing balance
- Protect open space both inside the UGB and in rural reserves
- Utilize agreements with agencies and jurisdictions to achieve growth concepts
- Retain the sense of place of each locality consistent with the Growth Concept
- Refrain from extending the Metro UGB into designated rural reserves
- Identify and protect designated open spaces
- Emphasize redevelopment of centers over development of new centers
- Create unique corridors along good quality transit lines
- Create higher density nodes around light-rail or high-capacity transit stations
- Create main streets and neighborhood centers
- Retain inner and outer residential neighborhoods
- Improve local street connectivity throughout the region
- Designate industrial areas and employment areas
- Maintain a supply of future urban land inside urban reserves

This brief overview of The Concept provides adequate reminders of the fine contribution Metro has given to regional and state land use planning. Subsequent chapters of the Framework Plan are relied upon to expand and perfect The Concept. And ultimately Metro codes and functional plans are relied upon to implement The Concept and other Framework Plan policies. Implementation often depends upon cities and counties amending their comprehensive plans.

During future acknowledgment reviews of whole plan elements, policies contained in The Concept relevant to each element will be considered and reviewed for adequate implementation measures. An important aspect of these reviews will be how Metro manages both to maintain the balance among competing values and to achieve the

hierarchy of design types, density ranges, mixed use centers, singular use areas, and linkage between selected uses.

(In the text that follows, * stands for "bullet".)

Chapter 1: Land Use

1.1 Urban Form

3rd*: It is unclear what housing interests are protected by the term "market-based preferences". Could the term be used to protect siting of acreage home sites within the UGB? Please clarify. (This question is relevant if the Commission determines that previously acknowledged RUGGOs are subject to this Framework Plan Review.)

1.2 Built Environment

2nd*: Requiring the "provision of infrastructure and critical public services concurrent with the pace of urban growth" potentially sets up a tension with the earlier policy (1.1) of "assuring affordability and maintaining a variety of housing choices...". This tension is addressed in part by the **4th***. The acknowledgment review will look for a clarification of the term "pace of urban growth" to help determine when the concurrence of infrastructure and public services is required. The review will assess the measures implementing this concurrence requirement.

Also, the term "critical public services is not defined and, therefore, determining adequate implementation will be difficult or not possible. Please clarify which services are "critical".

1.3 Housing and Affordable Housing

4th*: Implementation of this policy ("a balance of jobs and housing within the region and sub-regions") would benefit from greater clarity about what ratios constitute "balance", where the boundaries of sub-regions lie, and how balance might vary from one sub-region to another depending upon sub-regional conditions and differences. Please clarify.

Revised Submittal: The original housing and affordable housing policies in the Framework Plan were appealed to LUBA. After undergoing heavy revision and a new adoption as part of a settlement agreement, they were resubmitted for acknowledgment. In their current form, these policies note Metro's determination that affordable housing is matter of metropolitan concern and require preparation of a regional fair-share strategy,

completion of a regional affordable housing strategy and appointment of an Affordable Housing Technical Advisory Committee (AHTAC).

The AHTAC was created by Ordinance 98-769. The fair-share and affordable housing strategies have not been prepared and adopted.

The housing and affordable housing policies are an example of the questions involved in determining when and what to include in a review. The Commission might find that section 1.3 of the Land Use Chapter together with the Housing Needs Report of 1997, the declaration of regional concern and the ordinance creating the AHTAC are a "whole plan element" ready for acknowledgment review. The Commission might find that 1.3 is policy supported in part by the 1997 report and implemented in part by the AHTAC ordinance but awaiting the fair-share and affordable housing strategy implementation measures and additional documentation. The Department would like to discuss this matter at the June meeting.

1.4 Economic Opportunity

2nd *: Question – Is "to all modes" meant to be "by all modes"?

3rd para: Is the intent of this policy to permit UGB amendments based solely on "...an assessment of the type, mix and wages of existing and anticipated jobs within sub-regions...?" If yes, then it is not consistent with Goal 14. Please clarify.

1.6 Growth Management

1st *: The term "urban growth form" needs clarification as to meaning and intent. Assuming that the definition of "urban form" in the glossary applies here, then the clarification suggested should focus on "clearly stating objectives for urban form", as called for in the definition. Are the 2nd to 4th * the "objectives of urban form"?

3rd *: Although preserving "distinct communities" is a laudable regional policy, it remains subject to priorities in state statutes and rules. Clarification of how this policy is to be carried out within the state priorities would facilitate future urban reserve and UGB amendment decisions.

1.7 Urban/Rural Transition

3rd & 4th sub-* of 3rd *: See statement for 1.6, 3rd *.

1.8 Developed Urban Land

1st Para: The use of "should" in the clause "Metro should encourage the redevelopment and reuse of lands...", being inconsistent with rest of this policy, leads to ambiguity. Please clarify.

1.9 Urban Growth Boundary

1st Para: "Functional value of the boundary" is not a defined term. What does it mean? Is it a part of "urban form" used elsewhere in the Plan? Please clarify.

1.9.2: "First tier urban reserves" is currently recommended at Metro for deletion. We concur.

1.9.4: The Metro Code governing Urban Reserve Plans is currently being reviewed for amendment. This policy should be reviewed in conjunction with this Code review.

1.11: Neighbor Cities

2nd Para: See statement for **1.6, 3rd ***.

4th Para: The clause "The intent is to keep urban to urban accessibility high to encourage a balance of jobs and housing" is ambiguous, since heightened accessibility could also undercut jobs-housing balance by improving commuting. Please clarify.

Requirement: This paragraph seems to be for the purpose of defining what is required of cities and counties to implement Framework Plan policies. In order to fully achieve this objective, should "should be" in the last sentence be "shall be"?

Chapter 2: Transportation

2.4: System Objectives

The policy commences with the statement, "In developing new transportation system infrastructure, the highest priority should be providing accessibility and mobility to and from central city, regional centers and industrial areas and intermodal facilities" (underline added). However, 2.13.1 permits a secondary transit level of service to industrial areas and Table 2.1 in 2.18 assigns the lowest of three mode-split targets for non-single occupancy vehicles to industrial areas. Also, 2.7 seeks to reduce the need for additional transportation facilities by supporting a balance of jobs and housing in subareas of the region.

The largest concentration of jobs in a subarea outside of central Portland is the Hillsboro-Washington County industrial area, which is often referred to as a regional employment center. It appears to be inconsistent to not afford this area the highest priority for transit level of service, mode-split targets and jobs to housing balance. Please clarify or adjust these assignments.

2.11 Street Design

2.11.5: The street design polices in this section address federal, state and regional mandates as noted in the lead paragraph. However, 2.11.5 limits implementing measures to consideration of "non-binding guidelines contained in "Creating Livable Streets: Street Design Guidelines for 2040" (1997) and other non-binding resources." It does not seem adequate to rely on non-binding measures to achieve a series of mandates. Please clarify or amend this policy.

2.28 Motor Vehicle Level of Service

This policy says that "one-hour significant congestion is expected in both the a.m. peak-hour...and the p.m. peak-hour" in certain 2040 design areas and that "more than one-hour of significant congestion in either...is unacceptable...." While one-hour is a clear standard, significant is open broadly to interpretation during any implementation effort. The term significant needs to be defined for this policy to provide direction during implementation. (For example, Title 6 of Metro's Urban Growth Management Functional Plan allow for level F for one-hour a.m. and p.m. peaks and an additional one-hour "shoulder" of level E during each peak. Is level E for one-hour "significant congestion"?) Please clarify.

Chapter 3: Parks, Natural Areas, Open spaces and recreational Facilities

3.3: Management of the Publicly-Owned Portions of the Regional System of Parks, Natural Areas, Open Spaces, Trails and Greenways

3.4: Protection, Establishment and Management of a Regional Trails System

3.4.1 This policy directs that a Regional Trails System be included in the Regional Transportation Plan (RTP). It not clearly evident that the RTP includes a Regional Trails System, unless polices 2.14 (Pedestrian Transportation) & 2.15 (Bicycle Transportation) are the placeholders. If they are not, then Chapter 2 should be amended to include a placeholder for a Regional Trails System. If they are, then that should be stated.

3.5: Provision of Community and Neighborhood Parks, Open spaces, Natural Area, Trails and Recreation Programs

3.5.7: This policy directs certain content for Urban Reserve Plans that is not included in policy 1.9.4 Urban Reserve Plans. Please clarify.

The term "preserved in perpetuity for public benefit" is unclear and may not comply with the Statewide Goals. Do city and county comprehensive plans and implementing measures (codes) satisfy this term? If not, what does? Please clarify.

Requirements: This requirement states that a functional plan shall be prepared to satisfy three purposes identified by bullets. Is it assumed that these bullets encompass all of the policies listed in this chapter? If not, how are the remainder policies to be implemented? Please clarify.

Chapter 4: Water

4.1: General Policy Direction

1st Para: Metro Charter assigns a planning function regarding water storage to the Framework Plan. How does the statement "Metro has not assumed any function related to...storage..." comport with the Charter and with 4.2, Para. 2 ("A regional strategy and plan for the Regional Framework Plan element linking demand management, water supply sources and storage shall be developed...?")

4.2 Process

4th Para: This policy states, "...the regional water providers have reserved the power to make their own determinations for how to carry out these policies" for regional water supply. This appears to prevent Metro's ability to implement its Charter directive to plan regional water "source and storage", as well as the "Regional Framework Plan element linking demand management with supply sources and storage" (**2nd Para**). Please clarify.

4.3-4.12: These policies come from the Regional Water Supply Plan, a document not prepared by, and only "endorsed" by, Metro. Does their inclusion in the Framework Plan make them Metro policies to be followed by Metro in its planning?

If yes, does such a charge square with the somewhat hard lines drawn between roles for Metro, the Water Consortium and local governments?

These questions are important to consideration of Goal 2 compliance, in particular the direction to establish clear policies that are fully implemented.

Please reconsider and clearly delineate coordinated roles and functions for Metro in its relationship with cities, counties, districts, and the Consortium. Policy 4.13, Overall Watershed Management, should be included in this reconsideration.

Chapter 5: Regional Natural Hazards.

No statements about policies in this Chapter.

Chapter 6: Clark County

No statements about policies in this Chapter.

Chapter 7: Management

7.3: Applicability of Regional Framework Plan Policies

2nd Para. 3rd *: Since the Framework Plan includes functional plans for implementation purposes, why may Metro only identify and propose to cities and counties during periodic review of their comprehensive plans only those topics of regional concern that are recommended, but not required? Please clarify.

3rd Para: Why are the topics in chapters on Water, Regional Natural Hazards and Parks, Natural Areas, Open Spaces and Recreational Facilities (except for Greenspaces) excluded from this paragraph? Please clarify.

7.5: Functional Plans

2nd Para. 1st*: Why are the "land use planning aspects of solid waste management" not included in either in Chapter 1, Land Use or in a separate chapter? Please clarify.

7.7: Implementation Roles

Role of Metro: Metro implements certain of its Framework Plan policies directly through the Metro Code. Should another bullet be included to the effect: "adopt Metro Code provisions necessary and appropriate for the implementation of the Regional Framework Plan"? Please clarify.

Role of Metro, 7th *: The referent for "Objective 9" is not evident. Please clarify.

Chapter 8: Implementation

Chapter 8 is designed to link implementation measures to the several polices in Chapters 1-7. Following are some observation about consistency between Chapter 1 and Chapter 8.

Policy titles in Chapter 1 and those in Chapter 8 are not fully consistent.

<u>CHAPTER 1 TITLES</u>	<u>CHAPTER 8 TITLES</u>
1.01 Urban Form	Urban Form
1.02 Built Environment	Built Environment
1.03 Housing and Afford. Housing	Housing
1.04 Economic Opportunity	Schools
1.05 Economic Vitality	Economic Opportunity
1.06 Growth Management	Urban Vitality
1.07 Urban/Rural Transition	Growth Management
1.08 Developed Urban Land	Urban/Rural Transition
1.09 Urban Growth Boundary	Developed Urban Land
1.10 Urban Design	Urban Growth Boundary
1.11 Neighbor Cities	Urban Design
1.12 Protection of Ag & Forest Land	Neighbor Cities
1.13 Participation of Citizens	Protection of Ag and Forest Land
1.14 School Siting	Growth Concept

In contrast to the somewhat minor inconsistencies in the numbering system, the inconsistencies among topics in **bold** are more substantial.

Does the addition of "affordable" to the housing topic simply reflect the heavy attention it received late in the process of adopting policies or is something else intended?

Does the addition of "siting" to schools represent a narrowing of regional interest in schools and, if so, is it properly represented and coordinated in the two chapters? Or is there only an error in one of the titles?

Are "economic" vitality and "urban" vitality synonymous, or is something else intended?

There is no implementing section for Citizen Participation.

There is no policy chapter enumeration for the Growth Concept consistent with other policy chapters. Presumably the unnumbered section titled **The 2040 Growth**

Concept placed prior to Chapter 1 Land Use carries the same policy status as policies in the numbered chapters. This matter should be clarified.

CONCLUSION

This report is intended to be an informational document suitable to guide a discussion of important matters concerning acknowledgment of the Metro Regional Framework Plan.

No formal actions are requested or recommended. However, Commission discussions with staff and representatives of Metro and among Commission members are expected to provide some preferences and directions for later acknowledgment reviews of the Regional Framework Plan.

Attachment A: Table A, "Metro Role in Land Use Planning"
Table B, "The Regional Framework Plan"
Table C, "Framework Plan Elements and Applicable Statewide Goals"

Attachment B: Text of Framework Plan Policies

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Oregon

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March 9, 1999

Mr. Patrick Ribella, Long Range Planning Supervisor
City of Hillsboro
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Hillsboro, OR 97123

SUBJECT: DLCD Grant TA -U-99-237
South Hillsboro DRAFT Urban Reserve Concept Plan
First Tier lands - Urban Reserve Area #55

Dear Pat:

Thank you for sending us the draft Concept Plan of the above, found as section IX of the draft (pages 129 -- 159). We are pleased to review the submitted product in accordance with a condition of approval for review of the draft (special condition #1).

General Comments:

The Department of Land Conservation and Development (DLCD) awarded a Technical Assistance grant to support the preparation of an urban reserve plan for exception lands (aka First Tier or Tier One land) independent of a larger plan for the adjoining properties that were and currently under appeal to Land Use Board of Appeals (LUBA). In applying for the grant, the City of Hillsboro understood that DLCD could not extend any grant monies for planning for those portions of the Urban Reserves Areas (URAs) #51- 55 under appeal; such monies awarded will be used exclusively for planning the Tier One lands. In turn, the Department of Land Conservation and Development recognized the necessity of incorporating some planning linkages to URAs 51-55 should they eventually be added to the UGB.

The Draft Plan, dated November 16, 1998, is primarily a detailed plan for all of URAs 51-55. It places such an emphasis on planning for all 1450 acres that the plan for the 475 first tier acres pales by comparison (eight plan sections compared to one; 126 pages compared to 30). This is an imbalance in technical analysis that must be corrected.

The First Tier Concept Plan must be revised and supplemented as appropriate for it to be a "stand-alone" plan that does not depend on linkages to the larger area for its development. We are asking the City, for purposes of the Tier One plan, to shift the paradigm, to one that recognizes the principles of:

- a) implementation of the planned land uses in Tier One can be accomplished separately from development of the rest of the area;
- b) inclusion of the First Tier lands within an expanded METRO regional Urban Growth Boundary may be the only URA that "stands alone" without the rest of URAs # 51- 54 and the eastern half (the "St. Mary's" property) of # 55 included.



Towards that end, we request that the draft First Tier Concept Plan be revised accordingly to include unequivocal statements in the introduction which confirms the above assumptions. This is a pivotal to the plan's revision, because of the fact that First Tier lands are required by METRO Code to be considered for inclusion in the UGB before other lands; and that state law has similar requirements for exception areas.

Further, we call the city's attention to the items listed below; our suggestions to be incorporated into the final draft. We offer the following specific comments in order that the Plan's revision become the genuinely stand alone plan envisioned by the approval of the state planning grant.

Specific Comments:

A. First Tier Implementation. The description of the planning process contains an extensive discussion about the "uncertainty" related to timing and the dual urban reserve status of the areas in URAs 51 through 55. While it may be true that there some uncertainty about the extent and final configuration for the UGB in the South Hillsboro urban reserve areas, this should not detract from the effort of performing a proficient planning exercise that addresses the uncertainty.

An appropriate approach taken by other planning exercises constrained by the same kind of uncertainty has historically used different scenarios and addressed those scenarios individually, with different planning assumptions to provide a broader range of analysis.

The Draft South Urban Reserve Concept Plan as a whole is a very detail planning exercise, beginning, as the plan states, with the assumption that it includes the 1,450 acres in URAs # 51-55. However, in the case of this First Tier Concept Plan, the plan must change its planning assumptions in accordance with the principles outlined above. This would then become the appropriate underlying basis for the technical analysis of the First Tier Concept Plan, centered around the Gordon Creek urban center.

The draft First Tier Plan indicates that if not all the land in URAs 51 - 55 is annexed into the UGB at the same time, and there is no commitment to annex the remaining land, the concept plan would be reviewed. The First Tier concept plan should be strengthened at this time, rather than later, to provide policy-makers greater information and certitude so that any subsequent review would be a minor one.

The document identifies constraints to Tier One concept plan implementation given the uncertainties. This is an appropriate discussion as long as the plan in turn provides a strategy to address them. In other words, given the constraints, what would be the City's plan of action if in fact only First Tier lands were ultimately included in the UGB? Hillsboro's response should be the implementation of a complete First Tier plan. In addition, there should also be a discussion about the opportunities for implementation as well as the constraints.

The Concept Plan contains a Future Land Use Plan map, Figure W. In order to strengthen the

plan as a stand alone planning document, Figure W must be revised to show only those land uses that are within the geographical limits of Tier One urban reserve lands, as shown in Figure V.

B. FINDINGS; re: Statewide Planning Goals 2 and 14. The Tier One Plan on page 157 indicates that findings that document compliance with Statewide Planning Goals 2 and 14 for this portion of USA 55 (First Tier) was in the process of being prepared. The Department cannot fully evaluate the Concept Plan for Tier One consistent with the Statewide Planning Goals until the City submits same. The Tier One Concept Plan is incomplete until findings for the First Tier Concept Plan are incorporated therein.

Related to the incorporation of these findings, the City will recall previous discussions between the City and the Department prior to grant approval. At that time we discussed your suggestion that the city would prepare two adoption ordinances that comport with the two concept plan documents.

Therefore, as part of the Tier One Plan, the City shall submit an "alternative" adoption ordinance for the Urban Reserve Plan covering solely the Tier One lands.

C. Metro Code (Section 3.01.012) Compliance for Concept Plans.

METRO Code requirements for the preparation of concept plans for urban reserve areas include a provision for an overall net residential density of 10 dwelling units per net developable acre. Tables 11 and 13 in the Concept Plan is a break-down of residential densities for the designations in the First Tier. The density ranges as shown in Tables 11 and 13 are inconsistent with the density ranges as shown on the map legend of Figure (map) W. The table shows the "average density by zone" for each designation to be the maximum limit of the density range shown on the map legend. This is an inconsistency that must be clarified in the final draft; and Table 11 and Figure/map W revised accordingly.

Table 12 on page 138 is an excellent description of the housing types to be developed in the Tier One residential program, with one exception described in the following paragraph. By following this program, development of the housing specified in this program will ensure that the density of 10 units per net acre is achieved. The Table is superior to the Future Land Use Map (Figure W) in this regard. Therefore, it would be extremely important that the Plan document contain a commitment for the implementation of this housing program. Supplemental language, perhaps in the form of a plan policy, must be added to provide needed policy direction so that this density is reflected in the actual residential buildout. The State is looking for a clear and definite indication in the Plan that stipulates and guarantees a net density of 10 housing units per acre. The City should also consider the creation of new zoning districts for the urban reserve areas that would more closely implement the densities and associated housing products.

The plan in Table 12 includes a residential component that is missing from Figure W. This is the "large single family" category, which is shown as 15 acres with 45 total units (designation of Low Density, 2-4 units/acre). It is our understanding that the Gordon Creek center and outlying neighborhoods did not contain any of these type of units; they were to be found to the east and

south in the Hazeldale area. Maps (Figure A and W) show this to be the case. Table 12 should be revised to eliminate this residential category. This revision would also make Table 12 consistent with Tables 11 and 13.

The METRO staff report dated November 24th identified deficiencies that were later corrected by subsequent submittals of supplemental material by the City (as referenced in METRO ordinance No. 98-788C). All of this information must be incorporated into the final Tier One concept plan.

At the time of publication of the draft South Urban Reserve Concept Plan, the draft Implementation section (page 123) indicated that Financing Strategies were in process of being devised. The City two weeks later submitted to METRO a "Conceptual Financing Strategy" for the protection of fish and wildlife habitat, water quality enhancement and mitigation, and natural hazards mitigation. In addition, while METRO found that the "financing strategy component" of the applicable METRO code requirement is accomplished, it also conditioned approval of the Concept Plan upon City adoption of a financing plan for funding public facility improvements prior to the conversion of land to urban uses. This was required to demonstrate the identified funding sources as contained in the plan and supplemental information are in fact adequate to provide those facilities in the Tier One portion of URA 55.

In this regard, the final concept plan must provide at least one more iteration in analysis that shows further definition of the financing strategy. This would be best accomplished by a re-working of Table 9. Table 9 was developed for the entire URAs 51 through 55. A similar table must be developed as a stand alone table for Tier One Lands.

Figures "R"; "S" and "T" are maps of various public facilities. If re-working Table 9 necessitates any physical changes to planned improvements, then "stand-alone" maps for these facilities must be included in the final document as well (for First Tier lands only).

D. Financial Assistance. Please indicate in the final document that funding for the work (Tier 1) was made available by the Department of Land Conservation and Development (standard condition #7).

The Department appreciates the City's cooperation. We look forward to receiving the final draft and disbursing the funds under the technical assistance grant.

Sincerely yours,

Meg Fernekees
Portland Metro Area Regional Representative

cc: Jim Sitzman, Urban Program Coordinator