



## RESERVES STEERING COMMITTEE MEETING #19 ANNOTATED AGENDA

Date: October 14, 2009  
Time: **9:00 a.m. to 4:00 p.m.**  
Place: Cascade Ballroom, Doubletree Hotel, 1000 NE Multnomah Street, Portland

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I. Welcome and Introductions (9:00 – 9:15)

*Debra Nudelman, facilitator*

- Agenda review
- Adoption of September 23, 2009 meeting minutes
- Updates since last meeting

Packet materials: *September 23, 2009 meeting minutes.*

II. Public Comment (9:15 – 9:30)

III. Recommendations to Core 4 on Preliminary Reserve Areas (Phase 3 milestone)  
(9:30 – 3:00; includes breaks and lunch)

*Debra Nudelman*

- Core 4 presentation of proposed areas of preliminary agreement and areas for further discussion.
- Recommendations to Core 4 from each Steering Committee member on preliminary reserve areas.

Desired Outcomes: *Steering Committee understanding of Core 4 discussions; Steering Committee members present stakeholder feedback on preliminary reserve areas, areas for further discussion, undesignated areas and what amount of land in the region is sufficient for urban and rural reserves.*

Packet materials: *Staff memo and map regarding Core 4's proposed areas of preliminary agreement and areas for further discussion; also please bring September 23 RSC meeting materials.*

IV. Next Steps and Wrap-up (3:00 – 4:00)

*Core 4/Debra Nudelman*

- Upcoming reserves process
- Confirm agreed-upon next steps
- Meeting summary and acknowledgments

V. Adjourn

### Reserves process – next steps

**Phase 4 milestone:** Reserve areas recommended via intergovernmental agreements – Dec. 2009

**Phase 5 milestone:** Metro designates urban reserves; counties designate rural reserves – May 2010

## **RESERVES STEERING COMMITTEE**

### **MEETING SUMMARY**

September 23, 2009; 9:00 am – 4:00 pm

Double Tree Hotel, 1000 NE Multnomah Street, Portland, OR

**Core 4 Members Present:** Washington County Commissioner Tom Brian, Multnomah County Commissioner Jeff Cogen, Metro Councilor Kathryn Harrington, Clackamas County Commissioner Charlotte Lehan.

**Reserves Steering Committee Members Present:** Chris Barhyte, Jeff Boechler, Katy Coba, Dennis Doyle, Kathy Figley, Bill Ferber, Jack Hoffman, Kirk Jarvie, Keith Johnson, Tim Knapp, Jim Kight, Sue Marshall, Mary Kyle McCurdy, David Mormon, Lainie Smith, Greg Specht, Dick Strathern, Jeff Stone, Richard Whitman.

**Alternates Present:** Drake Butsch, Aron Carleson, Bob Clay, David Fuller, Jim Johnson, Jim Nicita, John Pinkstaff, Kendra Smith.

**Facilitation Team:** Debra Nudelman, Melissa Egan, and Peter Harkema.

#### **I. WELCOME AND INTRODUCTIONS**

Deb Nudelman called the meeting to order at 9:15 a.m., welcomed everyone, made brief introductory remarks, and asked attendees to introduce themselves. She provided an overview of the agenda and meeting materials. There were no changes or modifications to the September 9, 2009 Draft Meeting Summary and it was adopted as final.

Deb asked the Reserves Steering Committee members for updates. David Mormon announced that the Department of Forestry has recently published a new report that may be of interest to Reserves Steering Committee members. He encouraged everyone to review it on their website.

#### **II. PUBLIC COMMENT**

Elizabeth Graser-Lindsey spoke to the RSC about local food production, saying that if we consider the global and regional trends that will impact us over the next 40-50 years, such as climate change and peak oil, she sees a public desire for more locally grown food. In her opinion, she does not see this process as taking into account the food needs of the region. She broadly recommends designating rural reserves.

Cherrie Amabisca from Save Helvetia showed the RSC maps with the locations where elk have been sighted in Helvetia. She noted that elk are not endangered or threatened, so they are not protected under the Endangered Species Act, but she feels that this area where wildlife exist ought not to be urbanized. She supports Metro's COO Recommendations that area north of Highway 26 be protected and designated as rural reserves.

Alan Amabisca did an analysis of several reports, including some from Washington County, concerning the shortfall in funds for transportation infrastructure. Infrastructure funding is an issue the entire region is struggling with. He said we can spend the money paving over our farms, or we can spend money improving what we have, upgrading and enhancing transportation options for our citizens.

Jim Emerson from the Forest Park Neighborhood Association distributed information to the RSC about the area north of Sunset Highway. He said the four adjoining neighborhood boards have all submitted letters to support a rural designation. In addition, he cited traffic studies which have been done on the area, which in his opinion, fail to take into account the reality of the landscape and weather. Finally, he said the Multnomah CAC was made up of many diverse voices, and they recommended rural reserves for the area north of Sunset Highway. Jim asked the RSC to please recommend rural reserves.

Greg Mecklem lives and farms in Helvetia. He would like to commend Michael Jordan's recommendations, he believes they reflect the right vision for the region in the future. He has been doing soil analysis and he came to the conclusion that 75% of the total land in Helvetia are class 1 or class 2 soils, making irrigation largely unnecessary. He discussed other areas that he feels deserve special protection due to the high quality of soils, and reiterated his support for rural reserves.

### **III. STRATEGIES FOR A SUSTAINABLE AND PROSPEROUS REGION**

Michael Jordan, Metro Chief Operating Officer, spoke to the RSC and Core 4 to give an overview of the Strategies for a Sustainable and Prosperous Region, generally referred to as the COO Recommendations. He thanked everyone for being here, and especially thanked the staffs of the three counties who have put in so much work on this important endeavor. The Recommendations represent a transition in the Reserves process; policy makers now have to take all the information and recommendations, and start to make the difficult decisions. Over the next three to four months, there will be some major milestones. He referred the group to pages 14 and 15 of the Executive Summary, where one can find the major tenants of the recommendations. They are: 1) Make the most of what we have: Invest to maintain and improve our existing communities; 2) Protect our urban growth boundary: To the maximum extent possible, ensure that growth is accommodated within the existing boundary; and 3) Walk our talk: Be accountable for our actions and responsible with the public's money. He continued, saying that in the deliberative phase, policy makers need to see the whole, not just the sum of the parts. This recommendation attempts to link all the pieces. It is a form of hydraulics - when you change one variable, it will impact other areas.

With these recommendations, Metro does not take a radically different approach to their comprehensive growth management policy. That being said, there have been some changes. This somewhat different approach is aimed at achieving the region's desired outcomes on page nine: vibrant communities; economic prosperity; safe and reliable transportation; leadership on climate change; clean air and water; and equity. Michael stressed that an important facet of the chapter ahead is attempting to move the region from being the greatest planned place to being the greatest place, emphasizing moving from planning to action. He said that what policies, regulations and effort we put forth, along with how well we direct the public's money, will have more to do with our success than anything else.

The major substantive themes in the recommendations concern: 1) the investments we make to maintain current infrastructure and optimize capacity to greatest degree possible and 2) protecting the Urban Growth Boundary by limiting the expansion of the UGB over the policy horizon, all the while keeping in mind that this region needs to make choices which will support a robust economy. He noted that the major difference in this forecast is that it is a range forecast, not a point forecast. They looked at high and low potential, and considered both 20 and 50 year timeframes. A 50 year forecast is a first for Metro. They tried to take into account areas where the market is not responding to zoned capacity. They want to know how you realize zoned capacity, and if you cannot, what are the impacts.

Another significant aspect of the COO Recommendations is the Regional Transportation Plan. The Joint Policy Advisory Committee on Transportation and the Metro Council have been going through the RTP for years, and are prepared to adopt it this fall. JPACT has looked at how the region invests money in transportation and how to repair and maintain the system we have built. Michael said we need to adopt a use pricing strategy and invest in technology to get more capacity, noting that when we do make choices, we need to opt for dense, multi-modal options which link investments to the transportation plan, with the goal of maintaining a compact urban form.

Turning to Metro's recommendations for urban and rural reserves, Michael explained how they approached the issue. They went back and studied maps, reports, and relevant criteria which make great urban places. That study led to statutory and rule changes, mostly around the areas of suitability. The trick has been balancing all these criteria. Metro will recommend a much higher threshold before the UGB is moved. We need to examine the relationships between governments, transportation infrastructure, and infrastructure funding before the UGB is moved. Title 11 compliance may not be necessary, but we need to determine what level is necessary. This is a policy question that still needs to be discussed. Also, they continue to struggle with how to handle an urban services requirement. Municipal governance ought to be considered an essential urban service. Michael thinks policy makers should consider all these factors before the UGB is moved.

Michael made brief comments about the third major tenant of the COO Recommendations, which is performance measurement. We have to establish agreed-upon metrics in order to be able to provide the future policy makers with trend data, so this process is not so arduous next time.

Michael next turned to the composite map of the three counties, which showed suitability areas, not recommendations. In the COO Recommendations, there are narrative descriptions of each area, containing criteria, natural landscape features, the nature of the issues, but no acreage. He went around the map, discussing several areas. As the RSC has learned, there are some areas that have the kind of landscape that could have multiple outcomes. We need to have continued conversation around these types of areas to consider the impacts of the multiple possible outcomes. In the COO Recommendations, they intentionally did not give acreage and they intentionally tried to indicate hard boundaries with natural resources. They chose the middle of the demand range and capacity range for the forecast, being cognizant of the process in 1998, which resulted in three years of litigation. He wants the ultimate decision to be sustainable.

Chris Barhyte asked how did local aspirations come into Metro's decision making process? Michael responded that they have heard from most communities in the region around land, centers, employment, growth, and preserving neighborhoods; they tried to balance all of the feedback. Local aspirations fit within a regional context. He knows the Reserves Steering Committee is focused on lands, but encourages folks to remember the linkages and balance for 25 cities and three counties. Dick Strathern commented that as elected official, he wants to compliment Michael on all the work that has been done. He thoroughly read the Executive Summary and is concerned that we do not have the measurements we need. He is concerned about the employment aspect. The Portland metro region does not have an agreed upon economic strategy. He finds this to be shocking, and he lays the responsibility at the feet of the region, not Metro. He feels very strongly that we need to take the long view in terms of our market strategy. Michael agrees, and added an explanatory comment about the economic development piece. Metro does not have the responsibility under Goal 9, the economic development goal. Metro's responsibility is coordination on land use, and to the degree there is an economic element, of course they have to consider it. Metro is a player, but not the convener.



Jeff Stone had two topics for Michael to address: the long term water supply availability and the definition of undesignated land, noting that the RSC heard Chair Brian share some apprehensions about undesignated lands, and he shares those apprehensions. Michael responded that they do not address water specifically, but he certainly encourages the Water Coalition that currently exists, or another group, to consider water. As for rural or undesignated, he thanked Jeff for reminding him to speak to those aspects of the process. For rural designated areas, he believes keeping a separation from the UGB is an important issue, and that rural reserves could be a tool to help that happen. Metro's position on undesignated lands is that they should be considered a risk management tool. He has recommended a relatively small urban reserve because there is risk in locking down a 40-50 year land pattern. Undesignated helps manage that risk. Policy makers 25 years from now will need flexibility, and they will have it if undesignated lands are used in this manner.

Jim Nicita asked Michael to expand a bit on accommodating more growth within existing UGB, the effect on land values, and architectural options, and design codes. Michael responded that the success of the Recommendations hinges on how we invest the public's money. It is also about changing the relationship between public and private investment. We have to get more involved in developing methods to take public money and link it to private investment. This is going to have to become the norm, not the exception, both inside and outside the UGB. On the topic of design codes, Michael feels the current review process is sorely lacking. He is not seeking only regulation, but sees the need to make better use of codes as a tool for growth management.

Greg Specht wondered about large lot availability, saying the region needs shovel-ready large lots. He noted Michael's reference to the higher threshold for moving the UGB in the future and that Appendix 3 recommends a fast-track process. Greg wonders if such a fast-track is even possible and if prospective employers will wait. Michael responded that the choice lies in preservation for certain kinds lands for future employment needs. The ability to overcome what has been a cumbersome, litigious process, and the ability to preserve the land once it is in the boundary for a specific kind of use. It is a choice for the policy makers – leave it out of the boundary, or bring it in and regulate it. Greg followed up, inquiring about the waiting we ask of the prospective employer if we rely on a fast-track process. From Michael's experience, he believes you have to be ready in a winter. Companies come to you in the fall, and will want to break ground in the spring. He does not have the process in his mind, but he knows it has to be expeditious and reliable.

David Fuller inquired about Troutdale. They wanted to add less than 1000 acres of very developable land. He sees nothing on the map. Michael responded that that was a tough one for him, and they erred on the side of the preservation of foundation farmland. It was a bit of peninsula that was proposed, and the access seemed difficult. David followed up, asking for clarification if it can still be added. Michael responded that the policy makers can add whatever they want. Jeff Cogen said that the map of the county considers only the suitability factors, and that the County Board has not made their recommendations yet.

#### **IV. UPDATE ON COUNTY RECOMMENDATIONS**

Brent Curtis from Washington County provided a brief update, saying not much has changed since the last Core 4, when he explained the whole process. There have refined some numbers due to re-calculation of GIS information. The RSC received a CD today with a vast amount of information, reports and Washington County's urban and rural reserves recommendations.

Chuck Beasley from Multnomah County also provided a brief update. The Board met, conducted extended public hearing, and adopted a resolution forwarding the CAC and staff suitability assessments to Core 4 and

the Steering Committee. Chuck referred folks to the packet of materials and went over the suitability maps and acreages on urban and rural suitability. He noted that the City of Troutdale is interested in urban reserve at their southeast edge. This area ranks low for urban suitability, but that does not mean that no urbanization could occur. It will be an on-going conversation. Chuck said that on the regional map, the Metro staff has done a great job in translating the information from the three counties. For Multnomah County, areas in green have a greater than low suitability for rural reserve, white areas equate to low suitability for rural reserve, and the cross-hatched areas are greater than low suitability for urban reserve.

Doug McClain from Clackamas County said that the Board of County Commissioners took action shortly after the last RSC meeting. He said that the comments in COO Recommendations are similar to the sentiments of the Board of County Commissioners. He encouraged the RSC to refer to the packet material for the most up-to-date maps and information. Doug referred to Mayor Fuller's comment and Michael Jordan's response, reaffirming that this is very much a conversation in progress.

## **V. RISKS AND OPPORTUNITIES**

Richard Whitman from the Department of Land Use and Conservation spoke to the RSC about the risk of under- or over-designating. He presented a PowerPoint called "Urban and Rural Reserves: How Much Land? Risks and Consequences." Richard wanted to share his thoughts, noting that this conversation requires a transition from considering lots technical information to getting into the policy questions. There are two categories: how much and where, for both urban and rural. He will focus his comments on the how much question, including risk. He added that these are his own thoughts, not of LCDC and not necessarily those of the state agencies.

In getting to a reasonable answer to this question, Richard said there are main levers: 1) over what period of time; 2) where in forecasting range do you land; and 3) the capacity within existing UGB. Concerning rural lands, not all are under threat of urbanization and the designation is supposed to be used for lands under real threat of urbanization. An issue with urban reserves is that they can include resource lands. If too much land is designated as urban reserves, it has the effect of undermining the state's policy of conserving farm and forest lands and urbanizing rural residential (exception) lands first, before resource lands. Once urban reserves are designated, it becomes difficult to add other non-reserve lands to the UGB, except in cases where lands are needed for a specific purpose. Top priority land for additions is urban reserves. Richard clarified the status of undesignated lands, saying that urban reserves must be exhausted before development can move on to undesignated lands. This is important for counties, for both future need and balance. Once the urban and rural are designated, the undesignated lands are going to be more difficult to bring into UGB.

To summarize:

- Risks of Too Much Urban Reserve Land: undermines policies to protect resource lands; encourages land speculation, and may lead to early loss of resource uses.
- Risks of Too Little Urban Reserve Land: may require a second round of reserve designations, but could provide more flexibility to respond to unexpected future conditions.
- Risks of Too Much Rural Reserve Land: locks up land for 40 to 50 years; could block addition of lands needed for efficient urbanization or for specific purposes.
- Risks of Too Little Rural Reserve Land: leaves lands that are important for resource uses at risk of conversion to urban uses; fails to provide certainty and stability to resource industries.

## **VI. SMALL GROUP DISCUSSION**

The Reserves Steering Committee were divided into two small groups to engage in discussion with two Core 4 members joining each group, along with technical staff.

## **VII. REPORTS ON SMALL GROUP DISCUSSION**

### **Green Group:**

#### **I. What were the highlights and major themes of your discussion?**

Scale:

- Need balance in scale to support both jobs and community livability while being able to pay for it; also need balance of representation - east/west side business representation
- Need to look at going less than 50 years
- There is a tipping point to being too conservative; pushes growth outside

Risks and consequences - jobs housing balance

- Not focusing investment dollars; diluting limited funds
- Jeopardizing quality of life that makes region economically attractive
- Pressure to develop urban reserves once designated
- Rural – impacts on agricultural land and agricultural economy

#### **II. Please summarize any areas of alignment or concurrence**

- General but not unanimous support for COO recommendations
- Concurrence about employment for different cities

#### **III. What was challenging about the conversation, any major conflict areas?**

1. Differing views on:
  - The progression of development infrastructure
  - Employment and ranges used in forecasting
2. Amount of urban reserves land designated in Washington County versus other counties

#### **IV. Were there any surprises, outstanding questions/issues or areas for further discussion?**

- No breakthrough on characteristics of undesignated areas
- Regional scale/balance needs further discussion
- Mechanism to revisit a means to manage future uncertainty
- Focus on areas of alignment and frame the discussion so it is not a win/lose
- State staff have only limited ability to comment – only facts not positions – which are still being developed at the State

## **Blue Group:**

### **I. What were the highlights and major themes of your discussion?**

Trade offs – between city aspirations, county desires for future growth, and the boundary of agriculture and natural resource lands

### **II. Please summarize any areas of alignment or concurrence**

- Natural features, major highways as a way to buffer. Riparian areas likely to be protected regardless of designation
- Under rural residential, some agriculture lands would be at risk
- Concurrence that we have a hard time agreeing

### **III. What was challenging about the conversation, any major conflict areas?**

- Rural reserves being used as an environmental overlay and natural areas being designated (Tualatin Wildlife Refuge)
- Conflict between growth and agriculture. Future use versus agriculture as an industry. Both employers. How to choose?
- Voter approved annexations, many looking at now, not 40-50 years
- New employment land equity to development on the edges

### **IV. Were there any surprises, outstanding questions/issues or areas for further discussion?**

- Reconciliation between the regional versus county numbers
- With limited dollars likely, should that drive the UGB or Reserves process?
- Common threshold reserves – rural reserve areas show protection and/or threat of development

Greg Specht commented that it was surprising to him that state agency representatives could not participate today. He thinks the RSC should have been made aware of that. He is concerned that someone directed the state representatives to not participate in this discussion and thinks that is not good at all. Richard Whitman added that, having just received the COO Recommendations a week ago, the agencies are working to understand them and formulate consolidated state agency comments. He stresses that there has been no muzzling and feels that they were able to participate today.

Denny Doyle commented that, regarding Troutdale's request, there seems to be a disparity in the jobs and housing balance. He does not want to see a job center in Multnomah County and housing concentrated in Washington County. He will keep beating this drum so people do not have to travel long distances in their daily commute. Drake Butsch said he has a lack of understanding of what went into Michael Jordan's report, especially in terms of Metro's numbers and Washington County's numbers. He wonders what the underlying assumptions were. Denny said that perhaps Washington County's numbers were so big because it is a reflection of the fact that people were honestly asked what they wanted. He was not surprised, noting that different groups have different aspirations. He feels it is a healthy thing that will contribute to the on-going dialogue.

Mary Kyle wondered if there would be modifications to Clackamas or Multnomah County information before the next meeting? The response was no, there will be no changes, but discussions are continuing. Tom Brian added that Washington County will take information from this meeting and the October 14 RSC meeting, get further input from cities, then will hash it out with Core 4. Kathryn Harrington agreed, saying they want advice then will go from there.

Tim Knapp was interested in hearing about what went into Washington County's numbers that lead to such different conclusions about need. Deb responded that, from a process perspective, she thinks we can put these requests for information down as action items, but what she needs everyone to be cognizant of is sharing perspectives from constituent groups at the October 14 meeting. She does not want conversations to be put on hold until you get the information. Sue Marshall added that she is not clear on the term "local aspirations," and wondered if it is a land use planning term or a part of a periodic review process that some jurisdictions underwent? Chris Barhyte said that from Washington County cities' perspectives, they arrived at a notion of local aspirations by doing community visioning, which went into Washington County's process. In the big report, each city considered numerous factors which allowed them to arrive at numbers which they proposed or requested. Additionally, he encourages RSC members to talk to their constituents. In his city, people largely do not want additional infill in neighborhoods. He does not think 34,000 acres is too much for urban reserves, a lot of work went into arriving at that number.

Keith Johnson asked if Michael Jordan's report essentially represents Kathryn Harrington. Kathryn said that Michael made this set of recommendations, and as a full council, they are now in listening mode. They do not yet have a position; it will be developed over the next weeks and months ahead. She really wants input from this advisory body; she does not want the RSC to be influenced by the opinions of Metro councilors.

Jack Hoffman commented on local and regional aspiration and how to balance those. People are conflicted, they do not like infill, they do not like sprawl. Folks will say do not tell me I cannot cut my tree down, but do not let my neighbor cut their tree down. The Metro staff has come up with a philosophy which involves a compact urban form, trying to minimize the auto dominated subdivision. Jack said we have demand, we have capacity, and we have a gap. We need to consider where the regional dollars will go, while balancing employment and housing.

Charlotte Lehan wants feedback on Washington County and Clackamas County rural reserve designations. She wants to know what is subject to urbanization and what role does it play. Washington County declares everything outside the urban designation as rural. In Clackamas, they utilized a more conservative approach, stopping at somewhere around the 3-mile line, thinking that beyond that it is not likely subject to urbanization. We could make rural reserves designations clear out to the Cascades, but she does not think that is what they were supposed to do.

## **VIII. NEXT STEPS AND WRAP-UP**

Deb thanked everyone for their participation today, especially the robust small group discussions. She asked everyone to talk with each other and the PMT members between now and the next RSC meeting on October 14. During that meeting, we will go around the table and hear from each RSC as a representative of your constituents. We will ask you to provide information and opinions to help the Core 4 focus on the decisions they have to make.

Greg Specht asked for clarification on how the recommendation process will work. Deb said it is fine to provide written materials on behalf of your constituents, that the RSC will not be voting, nor are we seeking consensus. No one is required to speak, but they hope for maximum participation by all RSC members. Members can join together if they have similar constituent interests and select one speaker to deliver their message. Charlotte added that she can see that some people may want to join together with a unified message, but each represents a stakeholder group, and the Core 4 wants the full flavor of all on the RSC. It is ok to have visuals, please bring them on a USB drive.

The meeting was adjourned at 3:17 p.m.

Meeting summary respectfully submitted by Kearns & West, Inc.

ATTACHMENTS TO THE PUBLIC RECORD FOR September 23, 2009

*The following have been included as part of the official public record:*

AGENDA ITEM	DOC TYPE	DOC DATE	DOCUMENT DESCRIPTION	DOCUMENT No.
2.	Document and map		From: Elizabeth Graser-Lindsey	090923rsc-01
2.	Document	9-23-09	From: Cherry Amabisca	090923rsc -02
2.	Document	9-23-09	From: Jim Emerson	090923rsc -03
2.	Document		From: Greg Mecklem	090923rsc -04
4.	Document and Map	9-23-09	From: Washington County Staff	090923rsc -05



**Date:** October 12, 2009  
**To:** Reserves Steering Committee  
**From:** Core 4 Project Management Team Staff  
**Re:** Core 4 Proposed Areas of Preliminary Agreement and Areas For Further Discussion

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At their September 30 and October 9 meetings, the Core 4 focused discussion on the suitability recommendations for urban and rural reserves. Working their way around the regional map, they identified areas where there was initial alignment between the county suitability analyses, county advisory committee input, adjacent cities' aspirations and Metro's Chief Operating Officer September 15 recommendation. They also considered ways of reconciling differences between recommendations.

From these discussions, the Core 4 developed a list of "proposed areas of preliminary agreement" and a list of "areas for further discussion." These lists and a corresponding map are attached for your review and consideration. Note that discussions to this point have focused more on urban reserves, with more work to follow on rural reserves and undesignated areas.

The Core 4 emphasizes that this is a tentative first round proposal resulting from two discussions and is *not* intended to convey that decisions have been made or conclusions reached. They have not. This proposal is a way to help focus the areas for Core 4 and Reserve Steering Committee discussion at the October 14 meeting as well as subsequent Core 4 and governing board discussions, and public involvement.

Please review the attached list and map and come prepared to discuss these areas with the Core 4 and your fellow Steering Committee members on October 14. Your comments and feedback will help the Core 4 as they continue to develop and refine their reserve recommendations and as they further discuss issues with their respective governing boards.

This is an important opportunity to provide advice and direction to the Core 4 as they and the Metro Council and county commissions move forward in crafting a regional system of urban and rural reserves. Thank you for your efforts and contribution to the Reserves process and we look forward to seeing you at the meeting.



Date: October 12, 2009

To: Core 4

From: Core 4 PMT

Re: List of Proposed Preliminary Areas of Agreement and Areas for Further Discussion

### **Proposed Areas of Preliminary Agreement – URBAN**

Identifier	Area Name	Location	Approx. Acreage
UR-A	Area 93 bridge	Strip of land directly east of Area 93 in NW Mult. Co	144
UR-B	Bethany refinement	Strip of land centered on NW 185 <sup>th</sup> , west of N Bethany Plan	417
UR-C	N of Hillsboro	East of McKay Crk, south of Hwy 26 to city boundary	2,651
UR-D	S of Forest Grove	Small area south of Elm Street	37
UR-E	SW of Cornelius	West of SW Golf Course Rd between Tualatin River & city boundary	1,012
UR-F	SE of Cornelius	N of Tualatin River	1,698
UR-G	S of Hillsboro	West of SW 209 <sup>th</sup> Ave & north of Rosedale Rd.	2,000
UR-H	Cooper Mtn. East	Strip centered on SW 175 <sup>th</sup> Ave	1,055
UR-I	West Bull Mtn.	West of West Bull Mtn & north of SW Beef Bend Rd.	891
UR-J	S of Beef Bend Rd	S of Beef Bend, east of Roy Rogers Rd and north of Tualatin River	516
UR-K	South of Sherwood	South of SW Brookman Rd.	544
UR-L	Sherwood-Tual.-Wils. Industrial	Washington County portion between Sherwood and Tualatin	532
UR-M	West Wilsonville	North of Boeckman Rd & east of Graham's Ferry Rd.	121
UR-N	SW Wilsonville	Small area south of Wilsonville Rd, west of Willamette Way	63
UR-O	East Wilsonville	Area bisected by Boeckman/Advance Rd.	346



UR-P	Northeast Wilsonville	Area split by Clackamas-Washington county line with Elligsen Rd running through it.	253
UR-Q	N of Wilsonville	N of Elligsen & east of I-5	332
UR-R	Norwood Rd	N of Frobase Rd & east of I-5, centered on Norwood	845
UR-S	Borland Rd. Area	Linear strip centered on Borland Rd	1,297
UR-T	Oregon City	Three 'bench' areas south of City	169
UR-U	SE of Oregon City	Centered on Henrici Rd.	372
UR-V	Oregon City/Maple Lane	E of City centered on Maple Lane	411
UR-W	Central Oregon City	Newell Canyon area	699
UR-X	Oregon City/Holcomb Blvd.	East of City centered on Holcomb Blvd.	375
UR-Y	Damascus	South & SE of City to bluff and Noyer Crk	1,718
UR-Z	Boring Area	From Damascus on west to 282 <sup>nd</sup> (dbl loaded), and from county line on north to Kelso Rd on south	3,106
UR-AA	Springwater east	Small area east of Springwater Comm. Plan & south of Dodge Park Rd.	179
<b>TOTAL APPROXIMATE ACREAGE</b>			<b>21,783</b>

The above Proposed Areas of Preliminary Agreement represents the following acreage breakdown for the three counties:

Clackamas County	8,674
Multnomah County	323
<u>Washington County</u>	<u>12,786</u>
Total	21,783

### Proposed Areas for Further Discussion - URBAN

Identifier	Area Name	Location	Approx. Acreage
UR-1	Springville Rd.	L-shaped area bounded by N Bethany Plan on west and UGB on south, centered on Springville Rd.	464
UR-2	N of Hillsboro, N of Hwy 26	N of Hwy 26 bounded by Jackson School Rd on west, NW Phillips Rd on north and NW Kaiser Rd on east	5,496
UR-3	N of Council Creek	N of Cornelius between Hillsboro & NW Martin Rd.	6,664
UR-4	N of Forest Grove	N of City between NW Thatcher & Hwy 47, south of Purdin Rd.	477
UR-5	Farmington Area	S of Rosedale Rd, west of Clark Hill and Tile Flat roads, and north of Scholls Ferry Rd. east of Tualatin River to UGB	4,115
UR-6	West Cooper Mtn	East of Clark Hill Rd., north of Tile Flat Rd. to Cooper Mtn East (UR-H)	2,192
UR-7	West Sherwood	West and NW of City	2,484
UR-8	N of Sherwood	Small strip between the UGB and Tualatin River floodplain	92
UR-9	South of Sherwood, Clack Co	Southeast of City in SW Ladd Hill & SW Baker Rd area	870
UR-10	Stafford north	Upper Stafford triangle north of Tualatin River	1,537
UR-11	Stafford east	Small area eastern Stafford triangle	167
UR-12	Clackamas Heights	N of Oregon City centered on Forsythe Rd.	1,255
UR-13	Boring east	E of 282 <sup>nd</sup> Ave corridor, south & west of Hwy 26 and north of Clack-Boring Rd.	448
UR-14	Troutdale	SE of City, bounded by UGB on west, Division St on south and 302 <sup>nd</sup> Ave on east	845
<b>TOTAL APPROXIMATE ACREAGE</b>			<b>27,106</b>

The above Areas for Further Discussion represents the following acreage break-down for the three counties:

Clackamas County	4,277
Multnomah County	1,309
<u>Washington County</u>	<u>21,520</u>
Total	27,106

**Proposed Areas of Preliminary Agreement - RURAL**

Identifier	Area Name	Location	Approx. Acreage
RR-A	Sauvie Island	Entire Multnomah County portion of island	15,410
RR-B	East of 302 <sup>nd</sup> Ave	Area bounded by 302 <sup>nd</sup> Ave. on west, Sandy River on north and east, and county line on south	8,655
<b>TOTAL APPROXIMATE ACREAGE</b>			<b>24,065</b>

**Proposed Areas for Further Discussion - RURAL**

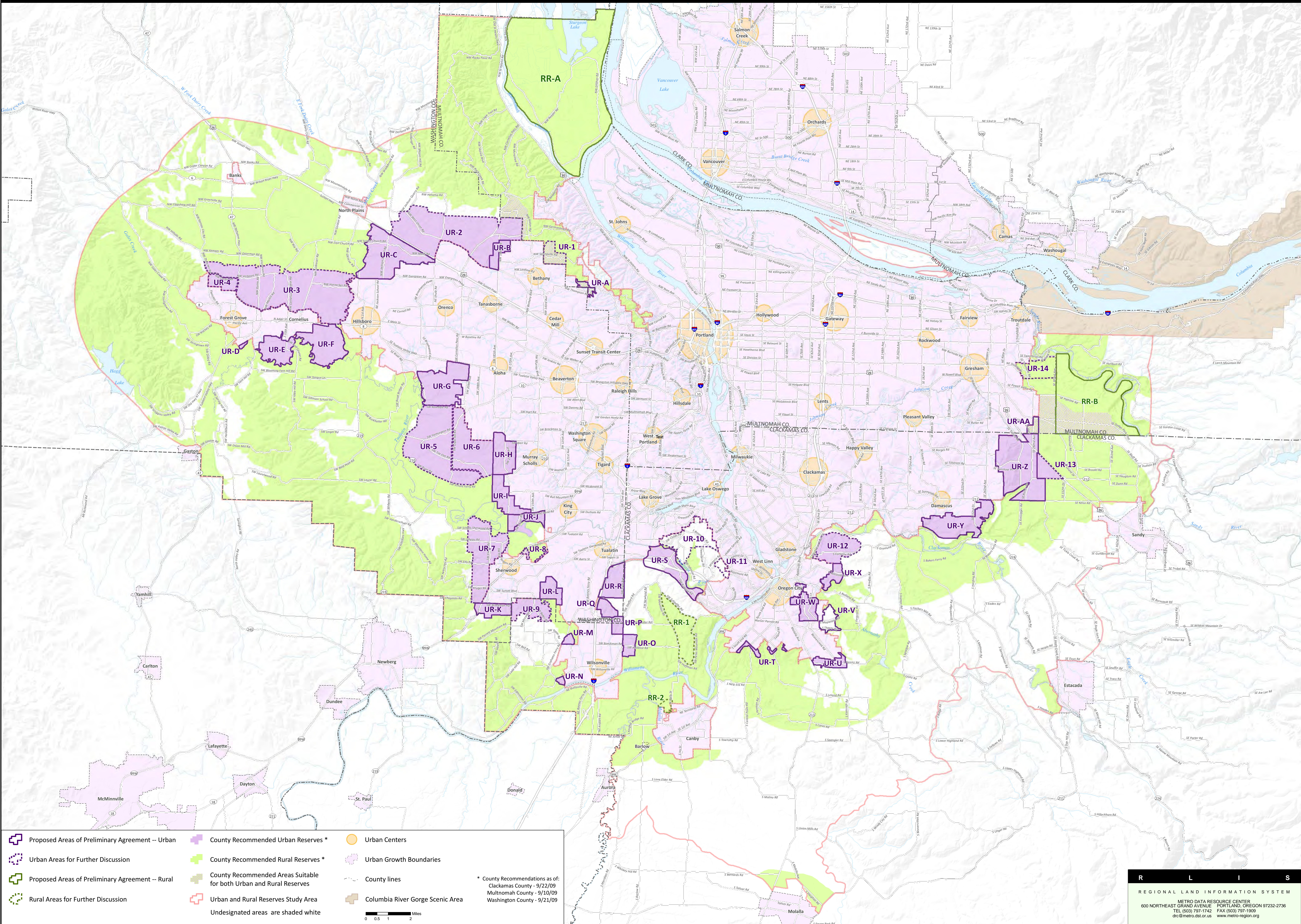
Identifier	Area Name	Location	Approx. Acreage
RR-1	West Pete's Mtn	Area bounded by approximately by SW Mountain, SW Schaeffer, SW Pete's Mountain and SW Hoffman roads	1,385
RR-2	NW of Canby	Small area bordered by City on east and south	?
<b>TOTAL APPROXIMATE ACREAGE</b>			<b>?</b>





10/12/09

# Core 4 Areas of Preliminary Agreement and Areas for Further Discussion





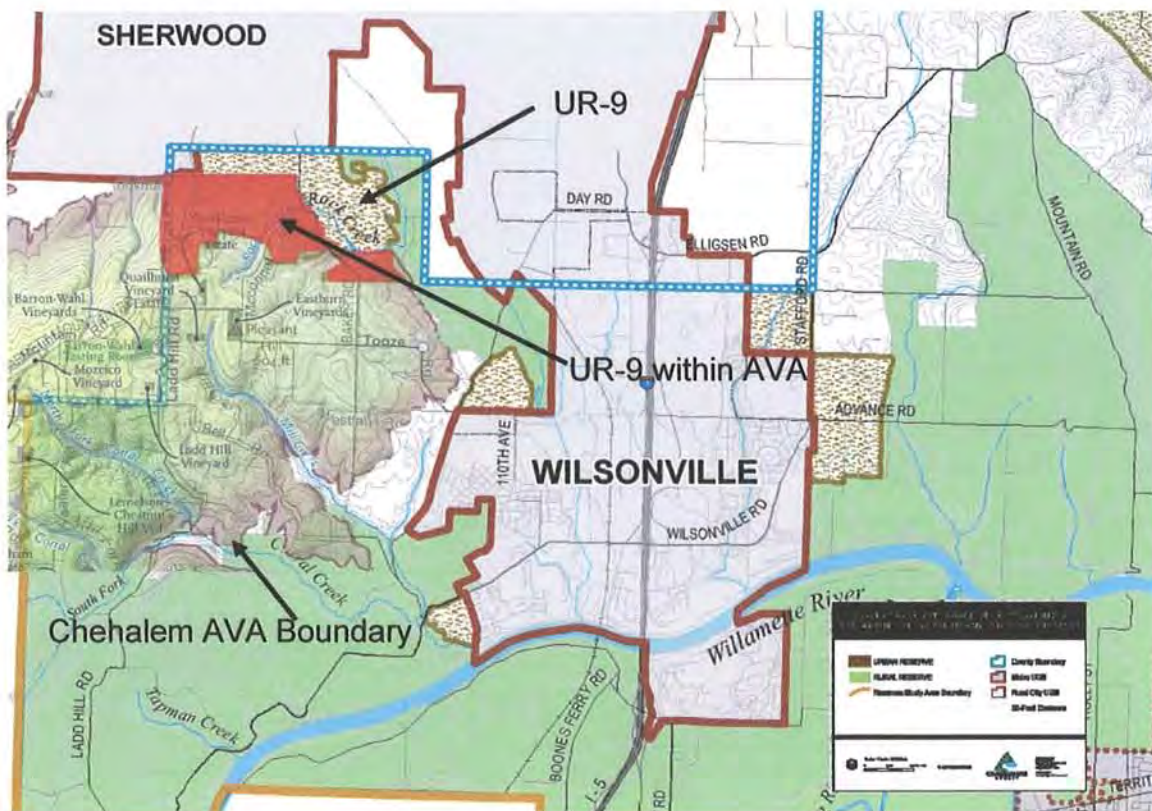
Materials following this page were distributed at the meeting.

For the Area South of Sherwood, West of Wilsonville in the UR-9 area, we respectfully request that the land in Clackamas County in this area NOT be included in the Urban Reserve as per the request from Washington County [WC]. We believe enough “uncontested” land has already been identified to meet “realistic” growth estimates for the city. Any more land consideration by WC should be confined with the borders of their own county. Please consider the following reasons:

- The city of Sherwood is assuming 2.8% growth. The historical growth in the area is only 1.5%, even considering boom years, and other regions are using the 1.5% rate in their growth calculations. (This information and the information below comes from the City of Sherwood’s PQCP report to Washington County).
- The city is assuming the population would double from the current population of 16, 420 to 30.193 by 2025 and almost quadruple in size by 2060 using their medium estimates. This is completely unrealistic. Even the Metro 2030 population forecast for Sherwood is 21,808 (Sherwood Vital Statistics Page on City of Sherwood website.) Sherwood does not have competency or the means to grow at these rates. People live in Sherwood because it’s a small community, and this type of growth would substantively change the climate of the area. Sherwood prides itself on the designation of Family Circle’s Best Town for Families and Money Magazine’s Best (smaller) Places to Live and this level of growth is unsustainable.
- Within the **CURRENT UGB**, as of June 2007 (city Stats page), Sherwood had 25 acres of available (unbuilt) commercial land and 75 acres of available residential land. At a density per acre of 12 at 2.75 persons per household (Sherwood’s numbers, this amount of unused residential land could house almost 2500 people within the current UGB. Using Metro’s forecast, a mere 88 acres of additional land would satisfy the needs of the city through 2025.
- Sherwood argues that it needs more land for jobs. The city has 160 acres of industrial land available, which represents 37% of total industrial land in the city. *If almost 40% of their industrial land is still not built, why does the city need more?* The topography of the land in this area includes steep hills and is unsuitable for industrial development. In addition, we argue that the city had plenty of industrial land available, and chose to house big box retail and strip malls in this land, bringing minimum wage jobs to the area rather than family wages. This further complicated the traffic situation within the city. If this is indeed the type of planning the city of Sherwood provides; we don’t believe they need to be given more.

- We contest a recent City of Sherwood comment that this area has “little agricultural value.” We believe a major oversight has occurred. The area in Clackamas County that Sherwood wants for Urban Reserve is part of the Chehalem Mountain AVA (wine/viticulture area) [see attached image area shaded in red]. There are currently 1366 acres of planted grapes in this AVA as a whole, and many vineyards reside within the area of study. There are 150 small vineyards in this area, most family-run. The number of acres of wine in this area since the year 2000 has more than doubled. This land brings economic value to Oregon, and the wine industry in general creates over \$200 million in wages alone in Oregon (2004 Economic Impact of Oregon State Wine report). In addition, this area includes farmland providing food to the local population. Bringing growth to this area, with the accompanying runoff issues, pesticides and development, damages this land and the ability to grow grapes and crops, not only in this area, but in surrounding areas impacted by runoff associated with urbanization. It also substantially changes the nature of the area and the livability of the region.

#### PAC Urban Reserve Recommendation Over-layed with Chehalem Mt. AVA



We request that you leave the area in Clackamas County that is UR-9 / West of Wilsonville/South of Sherwood out of the Urban Reserves and leave it Undesignated or Rural Reserves to keep Oregon the Greatest Place.

Sincerely,

Mike & Tanya Stricker

26930 SW Kane Ter  
Sherwood, OR 97140



**MARK J. GREENFIELD**

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**Attorney at Law**

14745 N.W. Gillihan Road  
Portland, Oregon 97231

Telephone: (503) 227-2979  
Facsimile: (503) 292-1636

September 30, 2009

Metro Core 4 and Reserves Steering Committee Members  
c/o Laura Dawson-Bodner  
Metro  
600 NE Grand Avenue  
Portland, Oregon 97232

Subject: Designation of Standring/Hartung/Berger Properties as Urban  
Reserves

Dear Core 4 and Reserves Steering Committee Members:

I offer this letter on behalf of Jim Standring, a Washington County property owner who owns 69 acres immediately north of US 26 and west of Helvetia Road, adjacent to Metro's regional urban growth boundary and the US 26/Shute Road Interchange.

At the September 23, 2009 Metro Reserve Steering Committee meeting, Metro Chief Operating Officer (COO) Michael Jordan presented his recommendation to the committee as to which lands should be designated urban reserves. For the North Hillsboro area, he recommended that lands south of Highway 26 extending west to McKay Creek be so designated, but that lands north of US 26 and west of Helvetia Road not be designated urban reserves. For the reasons stated below, Mr. Standring's property and the property north of his property comprise over 100 acres of developable land that are highly attractive for and ideally situated to meet the region's needs for very large lot industrial development, and as such, they should be designated urban reserve. Because they are located between US 26 and West Union Road at the very southern fringe of Helvetia, their designation as urban reserves would have minimal impact on the continuation of the agricultural enterprise in the Helvetia area.

**1. Suitability for large lot industrial development.**

Mr. Standring owns approximately 69 acres in two parcels located along Helvetia Road immediately northwest of the Shute Road/US 26 interchange (see Figure 1). His land adjoins the Helvetia Industrial Area immediately to the east, which is part of Hillsboro's "Silicon Forest" and which Metro added to its UGB several years ago. Immediately north of his property is an approximately 37-acre parcel owned by Tracey Hartung and Dana Berger. As shown in the attached August 19, 2009 letter they submitted to the Washington County Reserves Coordinating Committee, Ms. Hartung and Ms. Berger, like Mr. Standring, would like their property to be designated urban reserve

and identified for future industrial use. Together, the Standring and Hartung/Berger properties provide a 100+ acre site that is flat (slope under 5 percent), immediately adjacent to the existing UGB, very close to key facilities, and highly suitable for industrial development.<sup>1</sup>

As has been documented in economic development studies, there is a need in the region for large properties that can be easily developed for industrial uses. The availability of a 100+ acre site for industrial / employment use immediately next to the UGB in just two ownerships with willing owners is an opportunity that should not be passed up, particularly when the decision at hand is a fifty (50) year decision that needs to be flexible enough to accommodate sufficient industrial land to meet the employment needs of an attractive and growing region.

## **2. Efficient use of infrastructure.**

A concept plan has been developed for the Helvetia Industrial Area (see Figure 3). As shown on Figures 4 and 5, that plan provides for sewer and water services immediately adjacent or extremely close to Mr. Standring's property. Industrial development on the Standring and Hartung/Berger properties could connect to those sewer and water facilities with no foreseeable additional public investment. Instead, the developer would pay the costs to connect to these services. From the standpoint of service efficiency and public cost savings, it doesn't get better than this in the region.

At Metro's Reserves Steering Committee meeting held on September 23, 2009, several committee members emphasized that infrastructure is expensive, we all pay for it, and we need to use existing infrastructure as efficiently as we can. Unlike the Standring/Hartung/Berger site, most of the industrial area recommended for urban reserve designation by Metro's Chief Operating Officer (COO) north of Hillsboro is not adjacent or close to existing public services and will require costly service expansion over time. Given this, designation of the Standring/Hartung/Berger site as urban reserve seems a logical conclusion and an acknowledgement of the ability to efficiently serve the site. Compared to those other lands, this land clearly better meets the standards in ORS 195.145(5)(a) and (c) to designate lands that make efficient use of existing and future public infrastructure investments and can be served efficiently and cost-effectively.

## **3. Accessibility to US 26.**

The Standring/Hartung/Berger site is located immediately northwest of the Shute Road Interchange, which has been identified for improvements and associated funding as part of House Bill 2001 (2009 Legislative Session). As such, the site has immediate

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<sup>1</sup> North of the Hartung/Berger property is the approximately 33 acre Choban property. North of that is West Union Elementary School, which is part of the Hillsboro School District, an urban school district. North of the school is West Union Road. See Figure 2.

access to the freeway, which makes it extraordinarily valuable for large lot industrial development. Helvetia Road, which fronts the site, is designated as an arterial street. Transportation services to the site can and will be provided in an efficient manner, again clearly meeting the standards in ORS 195.145(5)(a) and (c) to designate lands that make efficient use of existing and future public infrastructure investments and can be served efficiently and cost-effectively.

With this access to US 26 and the efficiency with which the site can be served, it is hard to imagine that industries seeking large properties would not find this location extremely attractive. Indeed, with all its positive attributes for large lot industrial development, it makes no sense to exclude the site from an urban reserve designation. An urban reserve designation facilitates industrial development far more efficiently than relying on efforts to urbanize the site as undesignated land needed for a specific purpose.

#### **4. Drainage.**

Most of the Standring/Hartung/Berger site drains to the east, towards Helvetia Road. With minimal site work, the entire properties can drain southeast to Helvetia Road. This is true as well for the Choban and Hillsboro School District properties north of the Hartung/Berger property up to West Union Road. West of these properties, waters drain to the west (see Figure 6).

Previously, in the Bethany area, Metro used the drainage basin as a basis for determining a UGB "edge". Here as well, Metro could rely on the drainage pattern to establish an edge, although Washington County has provided detailed findings and reasons explaining why that edge should be located even farther to the west to serve industrial development needs over a 50 year planning period. If Groveland Road were the boundary to the west and West Union Road were the boundary to the north, the area could accommodate two (2) 100+ acre industrial sites in close proximity to urban services inside the existing UGB.

#### **5. Agricultural impacts.**

The subject property has been identified as "foundation" agricultural land. However, its location immediately proximate to the UGB and Helvetia Industrial Area; its large size (over 100 acres) and the region's need for large industrial lots; its immediate access to US 26 and an improved Shute Road Interchange; and the availability of public facilities with very little if any additional public investment make it far more valuable as industrial land. Further, its location on the very southern fringe of the Helvetia area next to US 26 means its removal from the agricultural land supply would have minimal impact on agricultural values and the continuation of the existing agricultural enterprise in the area, and generally, industrial uses are considered to be more compatible with agriculture than other urban uses.

## **6. Hillsboro and Washington County support.**

Both Washington County and Hillsboro are recommending that the site be designated as urban reserves for future industrial use, and Hillsboro has developed a pre-qualifying concept plan identifying the site for large lot industrial development. See Figure 7. As a 100+ acre site, the Standring/Hartung/Berger site could serve as an industrial anchor site. Mr. Standring would be willing to accept a condition that his property be protected for future large lot industrial use. This could be implemented by extending a Special Industrial District (SID) zone such as that currently being applied to the Helvetia or Evergreen Concept Plan areas. The SID, adopted by the City of Hillsboro, was designed to preserve the opportunity for large lot industrial uses through zoning requirements. This would be an appropriate method to protect for future large lot industrial uses on the Standring/Hartung/Berger site.

## **7. Conclusion.**

At the September 23, 2009 Reserves meeting, Metro's Chief Operating Officer said that to make the Portland metro area "the greatest place", the region must optimize the use of existing infrastructure to the greatest possible extent and must focus investments in terms of jobs and the economy. By virtue of its size, flat terrain, adjacency to the UGB, proximity to services, and proximity to US 26 and an improved Shute Road Interchange, and given the interest and willingness of its owners to see this site used for large lot industrial development, the 100+ acre Standring/Hartung/Berger site accomplishes these objectives better than virtually any other site in the entire region. Yet the COO did not include this land in his recommendation.

On December 15, 2003, the Industrial Lands Advisory Committee appointed by Governor Kulongoski issued a report identifying 25 industrial sites throughout Oregon with "statewide significance for job creation." Of the four sites listed within Metro's boundaries, two were on Shute Road. One, a 201-acre site, was identified as "flat" and "350 feet from a major freeway Interchange." The second, a 72-acre site, was identified as "situated near Hwy 26 and with excellent freeway access. The potential to add another 20 acres to the north could expand the site to 92 acres." Clearly, the economic value of flat, large lot sites extremely close to a US 26 interchange was undeniable.

Like the two Shute Road sites, the Standring/Hartung/Berger site offers "statewide significance for job creation." For the reasons stated above, we believe no potential urban reserve site in the Hillsboro area better meets the needs of economic development and the interests of Business Oregon than this site. We further believe no site can be developed more efficiently and less expensively than this site, given the services already planned for the area and the improvements to the Shute Road Interchange for which funding has already been committed. This site should be designated as urban reserve.

We thank you for your consideration and attention to this matter. Enclosed, for your reference, is an August 20, 2009 letter prepared by Frank Angelo, Angelo Planning Group, indicating in greater detail how the site meets the criteria for urban reserves and the factors in OAR 660-027-0050.<sup>2</sup>

Very truly yours,



Mark J. Greenfield

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<sup>2</sup> The attachments to that letter are omitted. The attachments to this letter provide the same information.

Figure 1: Vicinity Map

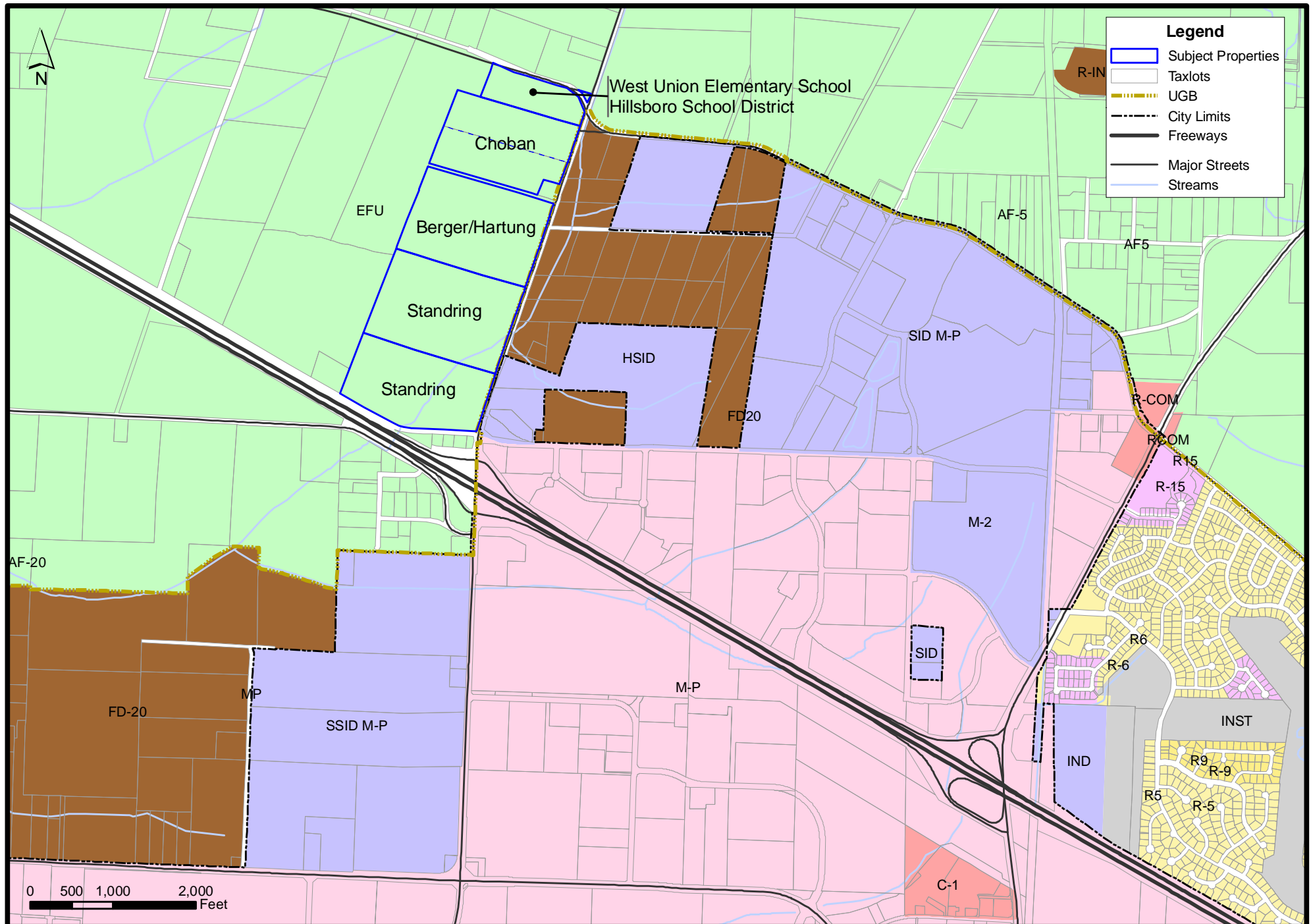


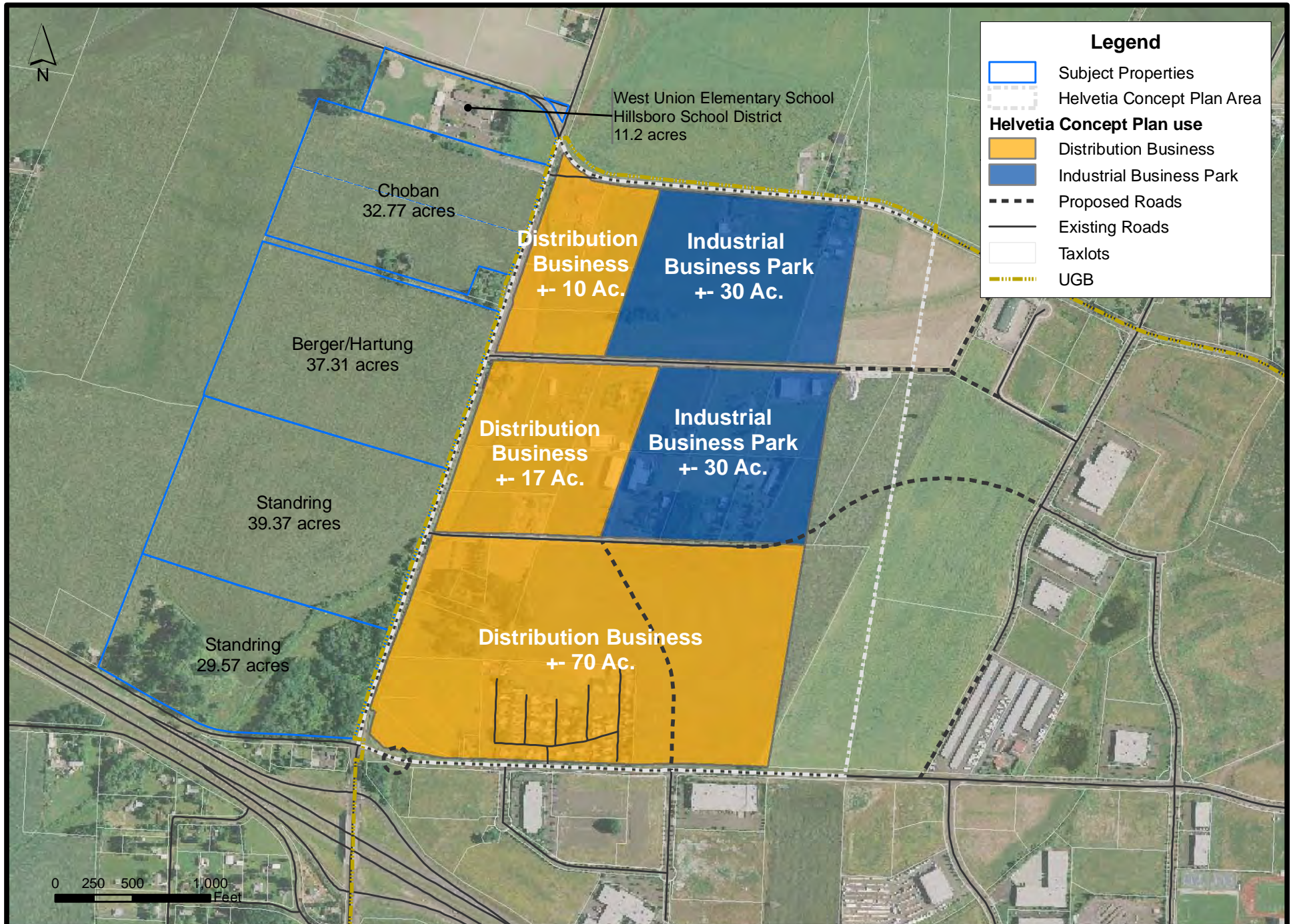
Figure 2: Property Ownership & Acreage



Source: RLIS August 2009



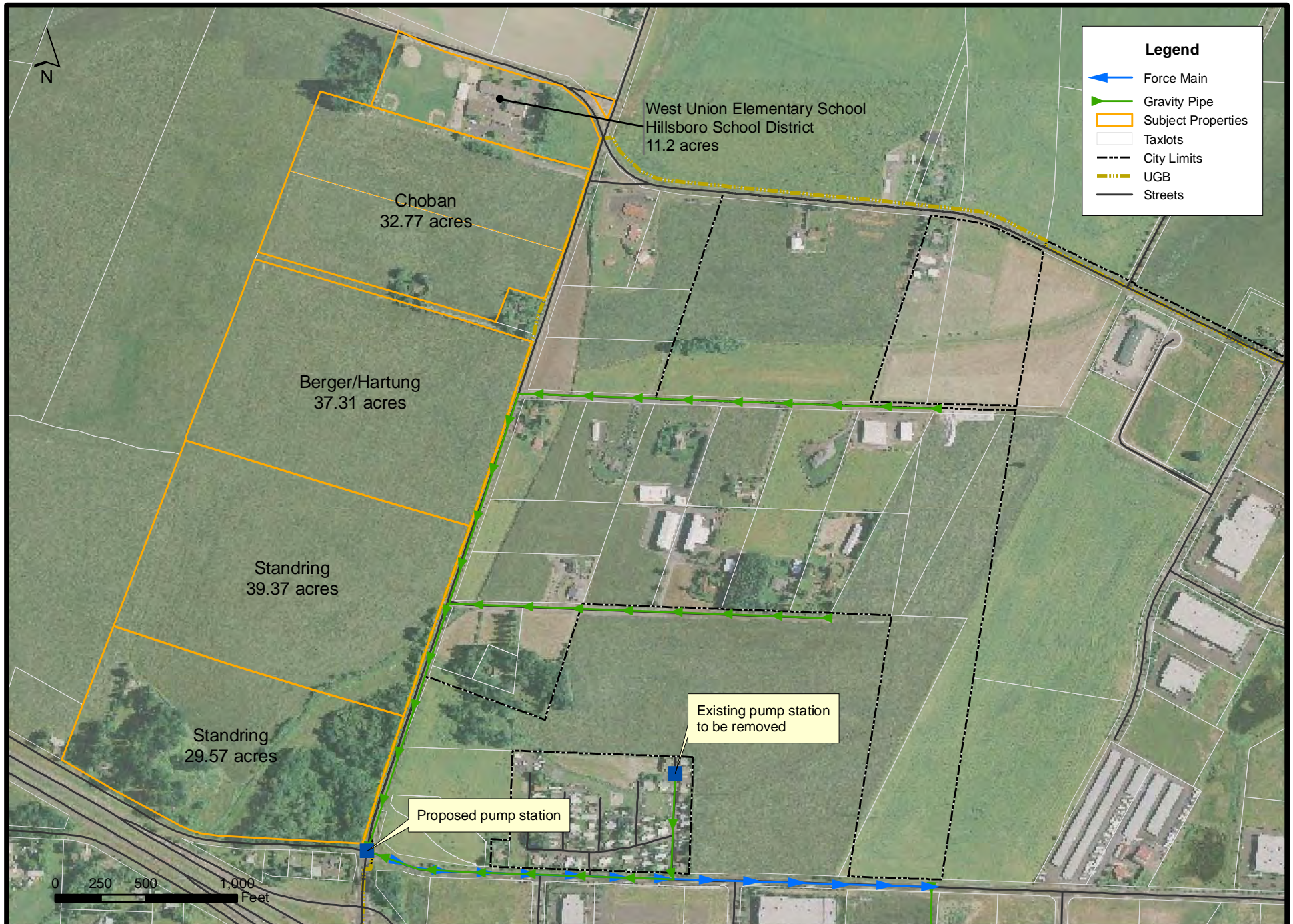
Figure 3: Helvetia Concept Plan - Adopted



Sources: RLIS August 2009, Helvetia Concept Plan



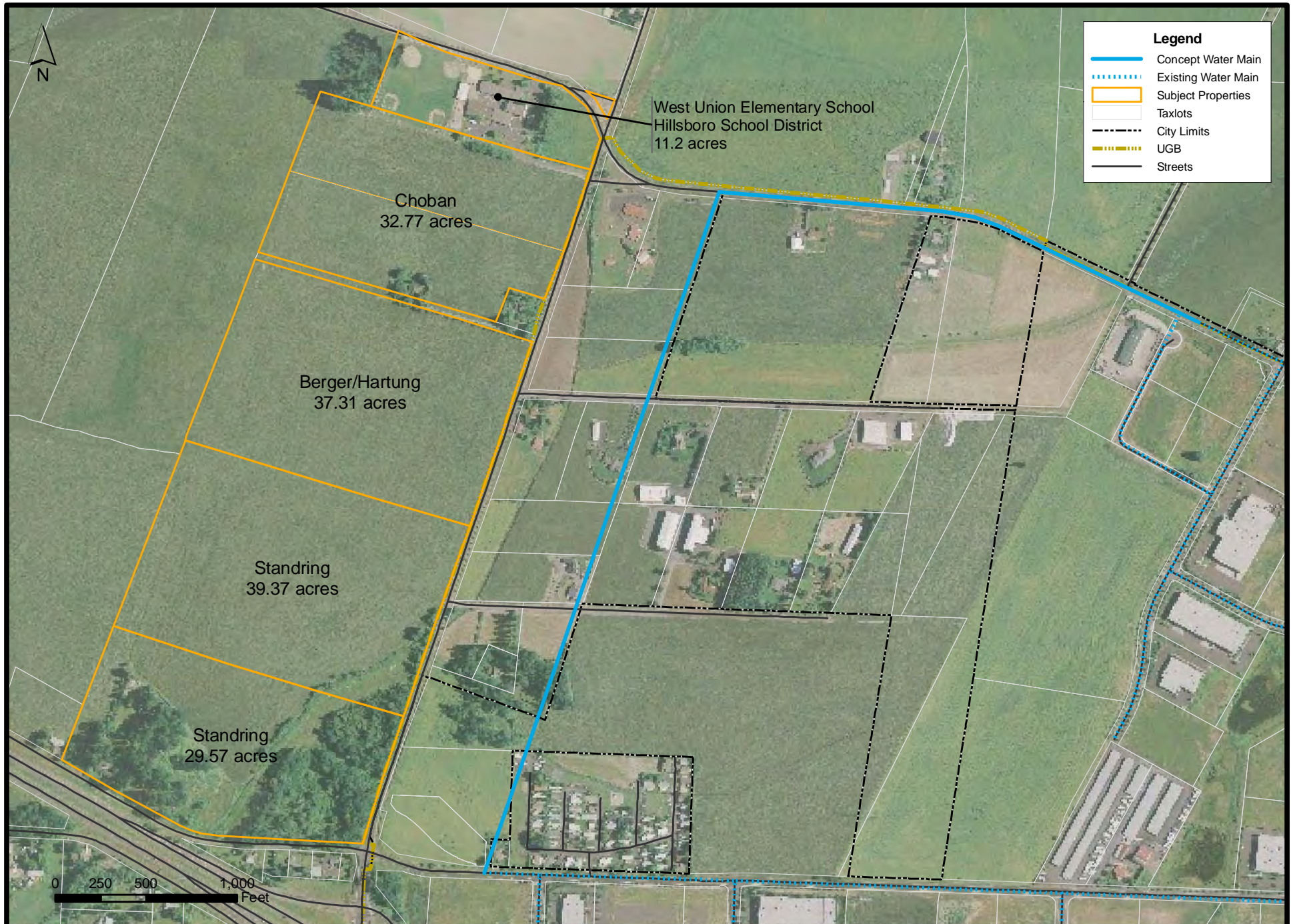
Figure 4: Sewer Proximity to Subject Properties



Sources: RLIS August 2009, Helvetia Concept Plan



Figure 5: Water Proximity to Subject Properties



Sources: RLIS August 2009, Helvetia Concept Plan



Figure 6: Topography and Drainage

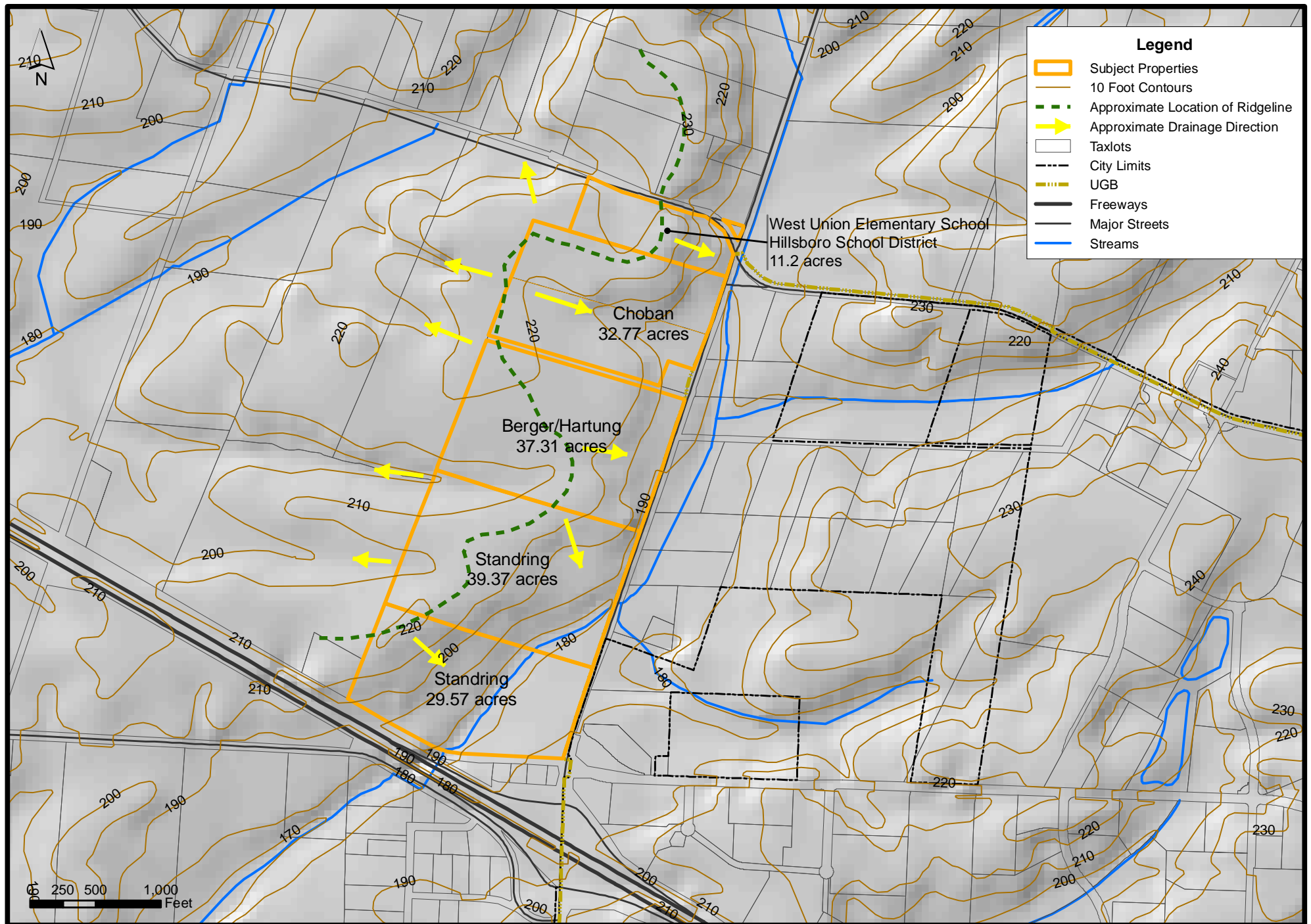
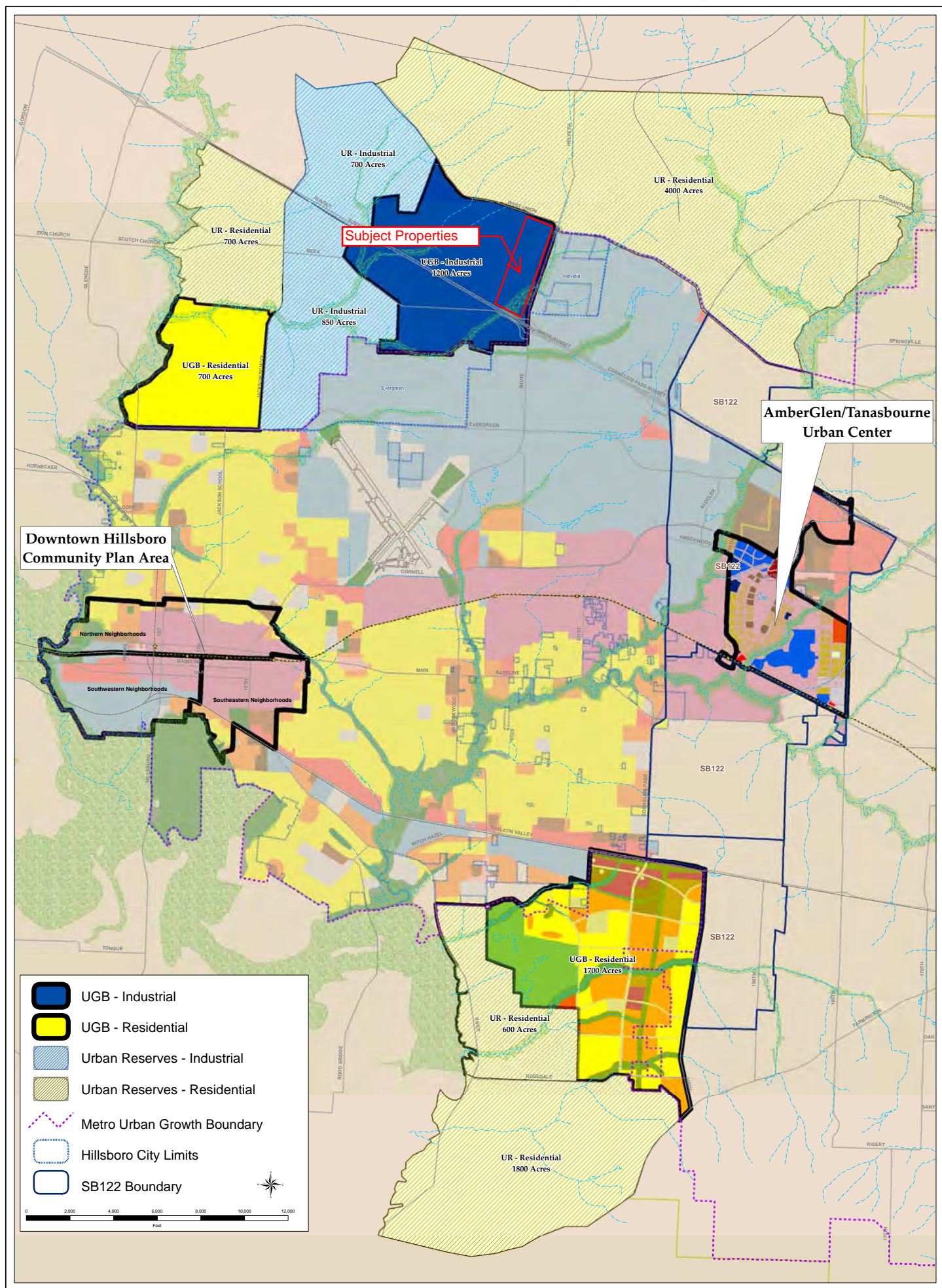




Figure 7: Hillsboro Pre-Qualifying Concept Plan





# Subject Site Proximity to Silicon Forest Employment Centers





August 19, 2009

Washington County Department of Land Use and Transportation  
Long Range Planning Division  
Attention: Urban and Rural Reserves Project Team  
155 N. First Avenue, Suite 350-14  
Hillsboro, OR 97124-3072

RE: Urban Reserve Designation

Members of the Washington County Reserves Coordinating Committee:

This letter is provided by our firm on behalf of Ms. Tracey Hartung and Ms. Dana Berger, who own property in the northwest quadrant of the Shute Road / Highway 26 Interchange.

Hartung / Berger Property

- Tax Lot 1N2150000905

Our property has been identified by the City of Hillsboro and the Washington County Planning Directors as an appropriate and logical location for future industrial / employment land to meet the identified demand for new jobs and for larger industrial lots within the Metro region. The proximity of these properties to existing employment areas, public infrastructure and the employment workforce supports the City of Hillsboro's conclusion that this area is appropriate for "Industrial Anchor Sites". The property has been recommended to be designated as Urban Reserve.

Ms. Hartung and Ms. Berger agree with and completely support the Urban Reserve designation recommendation and urge the Washington County Reserves Coordinating Committee to forward this recommendation to the Metro Reserves Committee.

The property owners believe that the subject properties are well-suited for designation as an Urban Reserve. This is supported by the following property attributes:

1. The property is located adjacent to the existing Hillsboro Urban Growth Boundary (UGB). The adjacent area in the city is planned for industrial / employment uses. The subject properties are located in close proximity to the Silicon Forest and the employment center that is developing in the North Hillsboro area, including the area immediately to the east.
2. The /Hartung/Berger properties are relatively flat, with no issues related to steep slope, making them an ideal location for employment uses and easy to provide the necessary infrastructure.
3. Transportation access is immediately available to US 26 via the Shute Road Interchange. Improvements to this interchange have been funded through the Governor's Transportation Program that was approved by the 2009 Legislature.

Helvetia Road, which the properties are adjacent to, is classified as an Arterial in the Washington County Transportation System Plan.

Again, we strongly support the recommendation that these properties be designated as Urban Reserve. We would be in opposition of any designation other than Urban Reserve. We appreciate your consideration and support for the Urban Reserve designation.

Sincerely,



Tracey Hartung  
Property Owner



Dana Berger  
Property Owner

cc Washington County Board of Commissioners  
City of Hillsboro City Council Members  
Metro Councilors  
John William, Metro

August 20, 2009

Washington County Department of Land Use and Transportation  
Long Range Planning Division  
Attention: Urban and Rural Reserves Project Team  
155 N. First Avenue, Suite 350-14  
Hillsboro, OR 97124-3072

RE: Urban Reserve Designation (1N2150000900; 1N2150000901)

Members of the Washington County Reserves Coordinating Committee:

This letter is provided by our firm on behalf of Mr. Jim Standring who owns property in the northwest quadrant of the Shute Road / Highway 26 Interchange. The ownership is as follows and is noted on the attached figure:

Standring Property

- Tax Lot 1N2150000900 – 29.57 acres
- Tax Lot 1N2150000901 – 39.37 acres

The two properties total 68.94 acres. The two tax lots have been identified by the City of Hillsboro and the Washington County Planning Directors as an appropriate and logical location for future industrial / employment land to meet the identified demand for new jobs and for larger industrial lots within the Metro region. The proximity of the property to existing employment areas, public infrastructure and the employment workforce supports the City of Hillsboro's conclusion that this area is appropriate for "Industrial Anchor Sites". The property has been recommended to be designated as Urban Reserve. **Mr. Standring agrees with and completely supports the Urban Reserve designation recommendation and urges the Washington County Reserves Coordinating Committee to forward this recommendation to the Metro Reserves Committee.**

The property owner believes that the subject property is well-suited for designation as an Urban Reserve. This is supported by the following property attributes:

1. The subject property is located immediately adjacent to the existing Hillsboro Urban Growth Boundary (UGB). The adjacent area in the city is planned for industrial / employment uses. This is the anticipated use for the Standring property.
2. The subject property is located in close proximity to the Silicon Forest and the employment center that is developing in the North Hillsboro area, including the Helvetia Industrial area immediately to the east.
3. There are existing City of Hillsboro and Tualatin Valley Water District public services (sewer and water) adjacent to or in close proximity to the Standring property. These public services can be easily extended to serve the property.





4. The Standing property is relatively flat, with no issues related to steep slope, making them an ideal location for large lot employment uses and easy to provide the necessary infrastructure.
5. Transportation access is immediately available to US 26 via the Shute Road Interchange. Improvements to this interchange have been funded through the Governor's Transportation Program that was approved by the 2009 Legislature. Helvetia Road, which the property is adjacent to, is classified as an Arterial in the Washington County Transportation System Plan.
6. There is floodplain and associate vegetation in the southeast corner of the Standing property that can be protected and enhanced.
7. The property does not have any water rights associated with the land, nor is the property located within the Tualatin Valley Irrigation District, rendering the properties less agriculturally productive than similar properties with water rights.

The property owner understands the importance to the region and the state of having larger lots available for future industrial and employment expansion and agrees to work with the City of Hillsboro to insure that large lot opportunities are available when the properties are included in the Urban Growth Boundary. This coordination could include site master planning, the provision of necessary infrastructure, state "shovel ready" certification and marketing the property.

Again, Mr. Standing strongly supports the recommendation that this property be designated as Urban Reserve. We will oppose any designation other than Urban Reserve. The attachment to this letter provides documentation supporting the Urban Reserve designation, noting how the property meets the location needs for future industrial / employment areas and the SB 1011 and OAR 660-027-0050 factors. We appreciate your consideration and support for the Urban Reserve designation.

Sincerely,

Frank Angelo  
Principal

Jim Standing  
Property Owner

cc Washington County Board of Commissioners  
City of Hillsboro City Council Members  
Metro Councilors  
John William, Metro  
Mark Greenfield, Attorney at Law

Attachments: Urban Reserve Findings

# Memorandum

**Date:** August 20, 2009  
**To:** Washington County Reserves Coordinating Committee  
**From:** Frank Angelo, Angelo Planning Group  
Mark Greenfield, Attorney at Law  
**cc:** Washington County Board of Commissioners  
City of Hillsboro City Council Members  
Metro Councilors  
John Williams, Metro  
**Re:** OAR 660-027-0050 Findings – Standing Property

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## I. Background

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This document provides findings regarding the suitability of an Urban Reserve designation for property under the ownership of Jim Standing. The property is located in the northwest quadrant of the Highway 26 / Shute Road Interchange. The ownership is as follows and noted on the Figures 1 and 2:

### Standing Property

- Tax Lot 1N2150000900 – 29.57 acres
- Tax Lot 1N2150000901 – 39.37 acres

The two tax lots total 68.94 acres - ideally suited for future large lot industrial / employment use, the use that the City of Hillsboro and Washington County have identified for these properties in their Urban Reserve recommendation. This report refers to Mr. Standing's property as the "subject property" or "property".

The subject property is located northwest of the US 26/Shute Road interchange in Washington County. While located in unincorporated Washington County, the regional Urban Growth Boundary (UGB) and City of Hillsboro city limits border the property immediately to the east. The recently adopted (2008) Helvetia Concept Plan shown on Figure 3 shows the location of the subject property in relation to the employment area that is developing in the Helvetia Concept planning area.

In 2007, Senate Bill (SB) 1011 was passed, requiring counties and metropolitan service districts (e.g. Metro) to evaluate and designate both rural and urban reserves, if reserves were going to be designated. Oregon Administrative Rules (OAR) Chapter 660, Division 27 (Urban and Rural Reserves in the Portland Metropolitan Area) was adopted in 2008 to implement the legislation. OAR 660-027-0050 establishes factors for designating urban

reserves based on criteria included in SB 1011, with the addition of two criteria related to preservation of natural features and compatibility with agricultural land and practices.

Over the past year the Washington County Department of Land Use and Transportation has been coordinating the efforts of the County and its cities to identify, evaluate and recommend Urban and Rural Reserves. This work has been led by the Washington County Reserves Coordinating Committee (WCRCC) which consists of representatives of the County, cities and the Washington County Farm Bureau. The extensive and thorough analysis that has been conducted over the past year has consistently identified the subject property as suitable for Urban Reserve designation. The Washington County Planning Directors have now made a recommendation to the WCRCC for the location of both Urban and Rural Reserve designations. This recommendation designates the subject property as Urban Reserve. The City of Hillsboro has also identified the subject property for future Industrial / Employment land.

Because of the subject properties' proximity to the existing UGB (adjacent), public services (immediately to the east), transportation facilities (US 26 / Shute Road Interchange which has approved funding for capacity improvements and Helvetia Road which is classified as an Arterial), site characteristics (relatively flat and easy to provide infrastructure to the property) an Urban Reserve designation is the most appropriate designation.

The property owner fully supports this recommendation as well as the expressed intent to include the property in the regional supply of large lot industrial property. The owner understands the importance to the region and the state of having larger lots available for future industrial and employment expansion and agrees to work with the City of Hillsboro to insure that large lot opportunities are available when the property is included in the Urban Growth Boundary. This coordination could include site master planning, the provision of necessary infrastructure, state "shovel ready" certification and marketing the property.

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## **II. Urban Reserves Factors Analysis**

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The following provides findings specific to the OAR 660-027-0050 factors that demonstrate the suitability and appropriateness of an Urban Reserve designation for the subject property:

### **660-027-0050**

#### ***Factors for Designation of Lands as Urban Reserves***

*Urban Reserve Factors: When identifying and selecting land for designation as urban reserves under this division, Metro shall base its decision on consideration of whether land proposed for designation as urban reserves, alone or in conjunction with land inside the UGB:*

***Factor 1 - Can be developed at urban densities in a way that makes efficient use of existing and future public and private infrastructure investments***

The subject property can easily be developed at urban densities – particularly industrial / employment densities. The property is well situated to make efficient use of existing and future infrastructure investments for sewer, water, or transportation facilities serving the Helvetia industrial area immediately to the east. As well, the site characteristics are well-suited for industrial / employment development. The property is relatively flat (slopes generally <3%), has few natural resource constraints, and its strategic location immediately adjacent to the existing UGB and city limits will support the large employment center that has emerged in the north Hillsboro area.

The following discusses the various public infrastructure improvements either in-place or planned for the area that can easily provide the necessary services to the subject property.

***Sewer***

Recent work related to sanitary sewer in the vicinity of the subject property includes the 2008 Helvetia Concept Plan. This plan was adopted by the City of Hillsboro for the area immediately to the east of the subject property. Figure 4 shows the location of the existing and future sanitary sewer system that will serve the area. The Helvetia planning area would be served primarily by a gravity system, with gravity pipes along NW Pubols Road and NW Schaaf Road running west, NW Helvetia Road running south, and NW Jacobson Road running west. An existing pump station in the southern portion of the area is planned be removed and replaced by a pump station at the intersection of NW Helvetia Road, Jacobson Road, and Groveland Drive into which the gravity pipes will flow. From the new pump station, force mains would run east on Jacobson Road until just west of NW Century Boulevard, where they could turn and flow south in gravity pipes.

As can be seen from Figure 4, the existing and planned sanitary sewer facilities about the subject property and can be easily extended to the property to serve future industrial / employment uses. An earlier study prepared by Alpha Engineering (*Helvetia Road Industrial Land Study 2003*) found that the higher elevations on the subject property to the west of Helvetia Road could be fit with gravity sewer lines that would feed into a pump station from which sewer lines would extend to connect with nearby existing lines.

More recently the *Core 4 Preliminary Analysis of Providing Urban Level Sanitary Sewer Service Within Reserves Study Area* (February 9, 2009) studied sewer serviceability for sub-areas of candidate urban and rural reserve areas that are basically defined by drainage basin boundaries. The analysis found the sub-area that includes the subject property (sub-area S36) to have “high suitability,” where high suitability means:

*[G]enerally these areas are the easiest and least costly to serve. This includes those few areas where there is capacity in a nearby treatment plant or*

*conveyance facility, or those areas where capacity could be relatively easily provided. It also includes areas that require substantial improvements, but relatively easy ones for which there is land available or no major issues identified. These also include areas for which topography enables primarily gravity flow to an existing plant. For the most part, these areas will primarily require investment in facilities located inside the area to be developed, but be able to hook up to existing facilities inside the current UGB.*

This finding was derived from initial analysis about the efficiency of serving the sub-areas with sewer, in which the sub-areas were rated as “efficient”, “moderately efficient”, “moderately difficult”, and “difficult”. Sub-area S36 rated as “efficient” to serve, with comments that no substantial service issues identified. “Efficient” was characterized as follows:

*“These areas are the easiest and least costly to serve. They would require relatively simple extensions of the existing system within the area to be urbanized, and could connect directly to existing facilities in the existing urban area. These areas are the few areas for which the treatment and conveyance systems inside the current UGB appear to have capacity to serve areas outside the current UGB.”*

The subject property sub-area was one of a few sub-areas in the region found to be efficient for potential sewer service.

## **Water**

Recent work related to water service in the vicinity of the subject property includes the 2008 Helvetia Concept Plan. This plan was adopted by the City of Hillsboro for the area immediately to the east of the subject property. Figure 5 shows the location of the existing and future water system that will serve the area. Local water service provider Tualatin Valley Water District (TVWD) indicates there is enough supply to serve the Helvetia planning area in the 2008 *Helvetia Concept Plan*. The plan proposes to connect to the existing TVWD 24-inch transmission main in NW Jacobson Road and extend north into the site. Piping on the site could extend north to also connect with the existing 16-inch pipeline in NW West Union Road. Supplying the Helvetia Concept Plan planning area with water would require a total of two interconnections, two swale/creek crossings, one metering station at the 24-inch main in Jacobson Road, and new water transmission pipeline.

As can be seen from Figure 5, the existing and planned water facilities are in close proximity to the subject property and can be easily extended to the property to serve future industrial / employment uses.

The Core 4 *Preliminary Analysis of Providing Urban Level Water Service Within Reserves Study Area* (March 23, 2009, Revised) examined water service issues for sub-areas defined by a combination of existing water service boundaries and landscape features including floodplains, steep slopes, and major water features.

As with sewer service the sub-area with the subject property was identified as “high suitability” in which case an area will only need typical extensions of service and no new major facilities.

### ***Transportation***

The subject property is well served by existing transportation facilities, and access and mobility in the area will be further improved by a funded project planned for the US 26 / Shute Road Interchange and associated projects. Transportation access is immediately available to US 26 via the Shute Road Interchange. Improvements to this interchange have been funded through the Governor’s Transportation Program that was approved by the 2009 Legislature.

The subject property is directly served by and adjacent to NW Helvetia Road, an Arterial and NW Jacobson Road, a collector, according to the Washington County Transportation Plan. The 2008 Helvetia Concept Plan notes that NW Schaaf Road can be extended to the west to connect with the subject property. NW Pubols Road, also in the Helvetia Concept Plan, could also be extended to the west to the subject property. Both Schaaf and Pubols could easily form the entryways into an industrial / employment area on the subject property and provide limited access to Helvetia Road while providing an internal circulation system.

The anticipated future industrial / employment uses on the subject property would also have less of an impact on the transportation system from a capacity / level-of-service perspective than residential or commercial uses. The employment use would be compatible with the future improvements to the US 26 / Shute Road Interchange.

### ***Core 4 Preliminary Analysis of Providing Urban Level Transportation Service Within Reserves Study Area***

The most recent study of the area presented in the *Core 4 Preliminary Analysis of Providing Urban Level Transportation Service Within Reserves Study Area* (February 11, 2009) analyzed sub-areas for their suitability according to estimated cost per system lane mile, cost per added lane mile, and the number of intersections per square mile. The sub-areas used for the transportation analysis were derived from those used for the sewer and water service analyses.

System lane mile and added lane mile cost estimates address construction of needed collector and arterial roads, not local roads, and the number of intersections indicate existing and potential connectivity. The subject property sub-area ranked medium for both added lane and system lane suitability and high for connectivity suitability, corresponding to findings that the area was somewhat to most suitable for providing a transportation system capable of accommodating urban levels of development. The sub-area is one of seven sub-areas (of 15 total sub-areas) to rank high for connectivity suitability.

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***Factor 2 – Includes sufficient development capacity to support a healthy economy***

The roughly 70 acres that comprise the subject property are well-suited from both a site size and site characteristic perspective to provide sufficient development capacity in support of the region's economy. In particular, the subject property size will add to the region's scarce supply of large parcels available for future industrial and employment uses. The site characteristics – relatively flat, no natural resource constraints, and the rectangular shape of the three parcels – again add to the subject property's suitability for large lot industrial and employment use. These site features will allow infrastructure to be efficiently provided to the site, including development of an internal circulation system.

Studies within the region on industrial land supply have consistently noted the lack of large lots as a part of the region's industrial land supply inventory. These studies indicate that, in order to be nationally and internationally competitive, the region should have a supply of larger industrial parcels that can be easily served and available to industries looking for large sites. The subject property, in addition to having all of the necessary site characteristics for large industrial / employment uses, is located immediately adjacent to the current UGB and Hillsboro City Limits. The subject property also has outstanding transportation access with its immediate proximity to US 26.

The subject property could theoretically accommodate upwards of 1,300 new jobs depending the type of industrial / employment use that developed the site (assuming an average of 20 jobs per gross acre). In all likelihood, the number of jobs on the subject property would be on the order of 500 – 1,000 when the net developable area is taken into account. The ultimate job density would obviously be dependent on the user. However, the subject site does afford the opportunity and development capacity for a wide range of industrial / employment uses.

***Factor 3 – Can be efficiently and cost-effectively served with public schools and other urban-level public facilities and services by appropriate and financially capable service providers***

The subject property is inside the Hillsboro School District service area and is adjacent to the City of Hillsboro, a full-service city. Future development of the site would occur within the City of Hillsboro following annexation. As a full-service city, the City of Hillsboro provides police, fire, parks and recreation, libraries, transportation, planning, and permitting services. Waste management is provided by a private contractor, Hillsboro Garbage. The response to Factor 1 above demonstrates how the subject site can be efficiently and effectively serve with urban-level public facilities.

The subject property is also in close proximity to the availability of specialized utilities (gas) and public utilities – specialty gases are available east of Shute Road and north of Evergreen Road. This utility is an important consideration for future high tech users.

Finally the Hillsboro Airport is 3.5 miles to the south/southwest of the subject property, making it very accessible for corporate use and for freight / supply delivery.

There are two schools within two miles of the property: West Union Elementary School, at 23870 NW West Union Road, north of the site less than ½ mile, and Liberty High School, at 21945 NW Wagon Way, about 1 ¼ miles southeast of the site. According to the Oregon Department of Education 2008-2009 Enrollment Summary, enrollment at West Union Elementary School was 317 students on October 1, 2008, and enrollment at Liberty High School was 1,311 students.

Because the subject property has been identified as suitable for industrial / employment use, it is not being considered for future residential use. Future industrial / employment use on the subject property would not generate new students and would have no impact on school enrollment levels or school capacity issues. Future industrial / employment uses would, however, provide property tax revenue to the school district.

The subject property, as a potential employment site also benefits from close proximity to the Rock Creek Campus of Portland Community College (PCC) and the technical educational and training programs it offers. Proximity to this high education / training facility is a positive factor for new industrial uses when they consider facility locations.

***Factor 4 – Can be designed to be walkable and served with a well-connected system of streets, bikeways, recreation trails and public transit by appropriate service providers***

The subject property is well-suited for providing connected streets and multi-modal facilities on site as well as connecting to surrounding facilities and transit service.

TriMet serves Hillsboro and Washington County. Existing bus lines are located just over a mile from the site and the Orenco light rail (MAX) station is about 2.5 miles away. There are park and ride lots at the Washington County Fairgrounds in Hillsboro and at Orenco Station. Ultimately transit service, most likely in the form of bus service, could be expanded to this area to provide service to the employment center north of US 26.

Topographic conditions on the subject property consist of slopes that are primarily less than 3%. These are favorable conditions for creating streets, bikeways, sidewalks, and other paths internal to the property that are relatively flat and accessible. At the same time, natural resources found on the property associated with Waible Creek (sometimes called Waible Gulch) will need to be buffered from development and present opportunities for natural trails and small-scale passive recreation.

As discussed in the response to Factor 1, the Core 4 *Preliminary Analysis of Providing Urban Level Transportation Service Within Reserves Study Area* found the Standing site sub-area to have high suitability for connectivity. This gives a general indication of how well the site and other sites in the sub-area will connect with each other and areas surrounding the sub-area. Also, projects proposed as part of the Helvetia Concept Plan specify



improvements to NW Helvetia Road (i.e. upgrading the road to an urban five-lane arterial), which would include the addition of sidewalks and bikeways.

***Factor 5 – Can be designed to preserve and enhance natural ecological systems; and***

***Factor 7 – Can be developed in a way that preserves important natural landscape features included in urban reserves***

The subject property includes natural resources associated with Waible Creek, and designation of the site as urban reserves and its eventual development for industrial / employment uses will assist in protecting and enhancing the resources on the site.

Waible Creek is a tributary of McKay Creek in Washington County. According to Metro's 2009 Regional Land Information System (RLIS), there are about 15 acres of floodplain related to Waible Creek on the southern lot of the property. An interactive map from Metro's Habitat Protection web page shows the following resources on the site: Class 1 Riparian (highest value habitat), Class 2 Riparian (medium value habitat), Class 3 Riparian (lower value habitat), Class B Wildlife (medium value habitat), and Class C Wildlife (lower value habitat). Fewer acres would be impacted by flooding if the culvert under Highway 26 was increased to an appropriate size. This culvert will likely be replaced or enhanced when the Highway 26 / Shute Road interchange is improved.

As cited in a November 2001 memorandum from Winterbrook Planning regarding Metro Goal 5 Mapping of Property at Northwest Corner of NW Helvetia Road and NW Groveland Drive there is a lack of riparian vegetation in the floodplain, the stream is channelized, US 26 and NW Groveland Drive form barriers to continuous riparian corridors, and there are not consistent riparian corridors on either side of these roadways. While designation of the site as an urban reserve or rural reserve will not necessarily alter the barriers created by surrounding roadways, designation of the site as an urban reserve presents the opportunity to restore riparian vegetation and a more natural channel for Waible Creek when development on the balance of the property occurs.

As cited in the 2003 *Helvetia Road Industrial Land Study* by Alpha Engineering, Waible Creek drains an area of at least 100 acres, with the drainage occurring primarily from the lower tax lots east. Incorporating protection of this resource into development on the site will serve as a buffer between development and US 26, allowing for natural stormwater detention and treatment on-site and providing opportunities for trails and small-scale passive recreation that are compatible with natural areas, as discussed earlier. The Shute Road Industrial Site also offers a model for integrating industrial development and natural resource protection that could be applied on this property through similar implementation provisions of City of Hillsboro code (Section 20, Subsection III) that regulate the Shute Road Industrial Site.

*(F) In accordance with the City's Goal 5 provisions of Section 6, Natural Resources, Open Space, Scenic and Historical Sites, of the Comprehensive Plan, the Waible Creek tributary riparian corridor and the upland wildlife*

*habitat resource located in the northwest portion of the Site shall be accorded "Level 1" ("moderately protect") protection, as prescribed by Hillsboro Zoning Ordinance Section 131A, Significant Natural Resources Overlay District.*

Most of the property is located in a drainage basin that drains eastward, and grading the rest of the site will complete the natural ridgeline between the site and lands to the west. Drainage to the east naturally joins and reinforces the connection of the property to the land across NW Helvetia Road. This land is inside the UGB and is being developed for industrial uses guided by the 2008 *Helvetia Concept Plan*.

***Factor 6 – Includes sufficient land suitable for a range of needed housing types***

The subject property could certainly support a range of attached single-family housing, detached single-family housing, or multi-family housing with a variety of lot sizes and densities. The Waible Creek resource area presents an opportunity for natural stormwater processing, higher-efficiency clustering of development, restoration of the riparian corridor as a condition of development, and open space and natural areas on the site, its protection being a benefit for both development and the resource area. The site also presents an opportunity for well-situated workforce housing, given industrial and employment uses in the area.

While the subject property could easily support a range of needed housing types, the anticipated future use of the property is viewed as industrial / employment use – not residential. Industrial / employments use of the subject property would likely be more compatible with surrounding industrial and agricultural uses and the transportation system in proximity to the property. Given its lower traffic generation rates and greater sensitivity to slope, employment – namely industrial – uses are appropriate for the site.

***Criterion 8 – Can be designed to avoid or minimize adverse effects on farm and forest practices, and adverse effects on important natural landscape features, on nearby land including land designated as rural reserves***

The subject property is zoned Exclusive Farm Use (EFU) by Washington County. The April 2004 *Metro Staff Report Addressing Amendments to the UGB for Industrial Land* identifies the area as Tier 3, lower quality resource land. As well, the subject property does not have any water rights associated with the property, nor is the property located within the Tualatin Valley Irrigation District making long-term agricultural use more difficult and uncertain. The site borders farmland on one side – to the west. This area to the west has also been recommended as future Urban Reserve. As described earlier, drainage on the site flows from a natural ridgeline on the west edge of the property eastward. This ridgeline provides a buffer between the site and uses west of it.

Designation of the subject property as Urban Reserve and future planning and development of it for industrial uses could follow the example established for the Shute Road Industrial Site by *Metro Ordinance No. 02-983B, Amending the UGB for Industrial Land near Specialized Facilities North of Hillsboro* (December 2002).

- Exhibit B (Conditions on Addition of Shute Road Site to UGB) – Adopt comprehensive Plan and zoning provisions for improving interface between industrial land and farm land including setbacks, buffers, and lanes designated for slow-moving farm machinery.
- Exhibit C (Findings of Fact, Conclusions of Law) – Industrial development is typically more compatible with surrounding agricultural uses than commercial or residential development, which generate more traffic and may be more adversely impacted by noise, odor, dust, and other effects of agricultural practices.

The Hillsboro Code adopted for the Shute Road Industrial Site reflects these findings and conditions and could be used as a model for future industrial / employment development on the subject property. Implementation measures for the industrial site in Section 20, Subsection III specified:

*(E) Site design and architectural measures that provide for compatibility between high-technology industrial uses and supporting uses, and nearby agricultural uses and operations, shall be considered and required through the City Development Review process, unless demonstrated to be physically or financially impracticable. Possible compatibility measures include, but are not limited to: building orientation and setbacks; landscaping; land buffers; and access easements for farming vehicles and machinery.*

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### III. Conclusion

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The subject property consistently meets the criteria for urban reserves established in OAR 660-027-0050. The site borders the current UGB and is immediately adjacent to the city limits of the City of Hillsboro. It is well situated to be served with public facilities and urban services. The site is lower quality agricultural land that lends itself to economic and industrial development given that it is relatively flat, can provide large contiguous parcels, and is in close proximity to major transportation facilities and other industrial uses. Natural resources on the site can be protected and enhanced and can provide an amenity to development and encourage clustering of development. Adjacency to farmland is limited and can be buffered by the natural ridgeline and drainage on the western edge of the property.

Given that it consistently meets the criteria established by OAR 660-027-0050, it is strongly recommended that the subject property be included in the final determination for regional Urban Reserves.

#### Attachments:

- |   |                 |                              |
|---|-----------------|------------------------------|
| • | <b>Figure 1</b> | <b>Vicinity Map</b>          |
| • | <b>Figure 2</b> | <b>Property Ownership</b>    |
| • | <b>Figure 3</b> | <b>Helvetia Concept Plan</b> |
| • | <b>Figure 4</b> | <b>Sanitary Sewer</b>        |
| • | <b>Figure 5</b> | <b>Water System</b>          |

Testimony of Michael Feves  
Before the Reserves Steering Committee  
October 14, 2009

I am here today to address urban reserve designations in the vicinity of Sherwood. The urban reserve acreage currently proposed by Metro would more than double the size of Sherwood. Currently, Sherwood is a very desirable place to live. It was recently named by Family Circle Magazine as one of the ten best communities to live in the United States. Doubling the size of Sherwood would destroy its livability.

In Sherwood, approximately 1,430 acres are zoned residential while approximately 575 acres are industrial or commercial. Sherwood needs more industrial and commercial land to provide employment for its residents. Much of the currently proposed urban reserve is not suitable for industrial or commercial development. Specifically, I would like to focus your attention on the area south of Sherwood. This area is not suitable for employment land because it is too steep, it is composed of small parcels with multiple owners, it is surrounded by residential and farm uses and it will be very expensive to provide adequate transportation access and other infrastructure. Therefore, I urge you to remove the urban reserve designation from the land south of Sherwood.

Faun Hosey  
13515 NW Jackson Quarry Rd  
Hillsboro, OR 97124

October 14, 2009

TO: Core 4 and members of the Reserves Steering Committee

I raise my voice in support of the Metro COO Recommendation. I agree that we must have careful planning of outcomes in order to protect the livability of our region! Concerning land north of Highway 26, and considering transportation impacts, I ask your support of a Rural Reserves designation to protect this land and our Agricultural Industry.

A key aspect of livability is ease of transportation. However, current expansion planning does not account for added traffic on limited rural roads.

For example, the ODOT plans expansion of the Shute/Helvetia Rd interchange. Hillsboro's "Helvetia Concept Plan" proposes industrial use north of Hwy 26 (currently outside Hillsboro city limits). And a request for Urban Reserve designation on the Standring/Hartung/Berger property is before you today. All of these plans completely ignore the impacts of added traffic on nearby rural roads. Enhancements are proposed to adjacent roads, recommending 3- to 5-lanes in several cases, but plans do not acknowledge the spillover that happens as commuters search for ways around congestion, nor do they make any mention of impacts on a multitude of uses in the adjacent rural area. Can we dismantle this planning?

Urban expansion will cause big traffic problems for our farming and wildlife areas. Combines, huge tractors, sprayers, and mowers necessarily use these roadways to move from field to field. They travel at traffic-stopping speeds of up to 12 miles per hour, and frequently require more than one lane-width to proceed. Deadly risk to wildlife would be increased. Rural residents, including children who board school buses where there are no sidewalks, would be negatively impacted at every intersection including every rural driveway served by farmers, residents and CSA customers. In addition, popular, recreational bicycling could become a Very Dangerous Pursuit as two-lane roads with no shoulders take on spillover traffic from urban expansion. These are unacceptable impacts on our regional livability.

And what about Cornelius Pass Road? A two lane Rural Arterial, it's a designated route for hazardous materials not allowed in the Vista Tunnel; it already carries traffic volume far in excess of its designed capacity; and it's so dangerous that it attracted a Federal Highway Safety audit last year. While some improvements have been made, funding is not available for all recommendations. And safety measures will not cure the capacity problems; even with unlimited funds, constraints related to geology, slope and wildlife areas will remain.

Transportation issues are just one set of concerns that point to the unsuitability of Urban Reserves north of Hwy 26. While my examples relate to this area, similar arguments apply to many of the 34,000 acres proposed for Urban Reserves in Washington County. Like Sauvie Island in Multnomah County, the agricultural areas of Washington County have regional significance and deserve your protection through Rural Reserves designation.

Thank you, Faun Hosey



From: Allen Amabisca  
13260 NW Bishop Rd.  
Hillsboro, Oregon 97124

October 14, 2009

To: Reserves Steering Committee

RE: Oregon White Oak trees north of Highway 26

I undertook a study of the Oregon White Oak tree population in the area north of Highway 26. Our study found over 4,000 Oregon White Oaks in this area.

My findings indicate that besides being a prominent and historic landscape feature for the area, the Oregon White Oak trees are important for three reasons.

Reason #1; Because less than 1 percent of historic Willamette Valley native Oak Habitats exist today, the Oregon Department of Fish and Wildlife has classified both the oak savannas and the oak woodlands as "Strategy Habitats" and Metro has classified them as, "Habitats of Concern".

Reason # 2; The Oregon White Oaks are habitat to several species that are "Vulnerable Sensitive Species" at the state level: the White-Breasted Nuthatch, the Western Bluebird, the Western Gray Squirrel, and the Acorn Woodpecker. The Acorn Woodpecker is also listed as a "Species of Concern" at the federal level.

Reason # 3; Calculations of tree ring growth from samples taken from area Oregon White Oaks confirm they are very slow growing and are very old. Based upon my measurements, the majority of the 4000+ Oregon White Oak trees north of Highway 26 are between 200-400 years old.

The protection of the Oregon White Oak Habitats in the area north of Highway 26 is not only very important to the area, but they are also important to the entire Metro region. I support Metro's Chief Operation Officer's recommendation that the agricultural land and natural features north of Highway 26 NOT be designated as urban reserves. The areas north of Hwy 26 must be designated Rural Reserves to protect this valuable Oak Habitat.

As you think about the farmland north of Highway 26, consider the following Cree Indian Prophecy; "Only after the last tree has been cut down, only after the last river has been poisoned, only after the last fish has been caught, only then will you find that money cannot be eaten."



October 14, 2009

Core 4 Members and members of the Rural-Urban Reserves Steering Committee

At the last Urban and Rural Steering Committee meeting I was appalled at the suggestion that Washington County has more than 34,000 acres in urban reserves. It is shameful. It is quite obvious the faces have changed at the table over the last hundred or more years, but the same arguments prevail. There is a group of people that look at their surroundings and think of future generations. On the other side is the business, construction and development community that think of themselves, making a cheaper dollar for today and forget future generations. It was so with the fight to establish our wilderness areas and wild rivers, our national forests, our national parks, our Clean Water Act and our Clean Air Act. We would have none of these with a group like those that made the Washington County urban reserves recommendations. This same group fought to deny Americans all of these things we prize so highly now. Imagine ourselves without a Grand Canyon, or Crater Lake or public access to our Oregon beaches.

I urge that you only consider the Conflicted land for urban areas as outlined in the Metro Agricultural Viability maps produced by ODA.

This is not only a matter of livability, it is national security. We may not always have easy access to off shore food and fiber. I urge you not to contribute to a landscape like the LA Basin. There is no reason that we can not have high raise buildings in Tigard, Oregon City, Beaverton and Gresham like they have in other cities. There is no reason we can't have 2-3 story industrial distribution centers. I would hope that the development industry would take the challenge of building one of the most advance development concepts of the present and next century – that is to go up and down, but not out.

Thank you for your attention – Do you have any questions?

Clair & Beverly Klock

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Corbett, OR 97019

504.695.5882

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DANA L. KRAWCZUK  
ALSO ADMITTED IN WASHINGTON

dkrawczuk@balljanik.com

October 8, 2009

Clackamas County Board of Commissioners  
2051 Kaen Road  
Oregon City, OR 97045

Re: **East of Damascus/Clackanomah Area – Request to Consider the South Side of Highway 212 Corridor to Highway 26 as an “Urban Reserve” or “Undesignated” Land**

Dear Board of Commissioners:

The Clackamas Board of County Commissioners' September 10, 2009 recommendation for the East of Damascus/Clackanomah area has Highway 212 as the dividing line between urban and rural reserve areas, which is a departure from the County's practice of "double loading" roadways and the region's policy of encouraging development along transportation corridors. For the approximately 4,700 lineal feet of roadway west of Highway 26 (which is less than a mile), the land north of Highway 212 is included in an urban reserve area, but the land south of Highway 212 is designated as a rural reserve.

The deliberations from the September 10<sup>th</sup> meeting reveal that County's reluctance to designate the property abutting the south side of Highway 212 as either an urban reserve or undesignated area was based on the misperception that the land was large tracts of agricultural land that are in active production. As detailed below, the south side of the Highway 212 corridor is parcelized and not actively farmed. Only 2 of the 24 tax lots are currently under special farm-use assessment. So that the region can maximize its investment in transportation corridors, we<sup>1</sup> request that the East of Damascus/Clackanomah area urban reserve be extended south of Highway 212 one lot deep. In the alternative, we request that the land abutting the south side of Highway 212 be removed from the rural reserve and left "undesignated."

## **Our Requested Change is Necessary to Recoup the Region's Investment in Transportation Infrastructure**

The lack of public and private financing available for infrastructure is at a near crisis level, and transportation improvements are among the most expensive. The region's policy

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<sup>1</sup> This law firm represents multiple owners of properties located at the southwestern corner of the intersection of Highway 26 and Highway 212.

of prioritizing urban development along transportation corridors is an effort to recoup and maximize our investment in transportation improvements. The County's practice of double loading roadways is a similar efficiency measure. The current recommendation for the Highway 212 corridor is incongruous with the regional policy of transportation corridor development and County practice of double loading because the recommendation prohibits urban development on half of the highway's frontage on the segment closest to Highway 26.

Not only is the current recommendation a missed opportunity to fund transportation improvements and recoup the investment in the system, the recommendation will actually make future transportation improvements more expensive and burdensome to construct.

As the eastern portion of Clackamas County urbanizes, including Damascus, Boring, and the development of an east Portland employment cluster, traffic will continue to flow east along Highway 212 to Highway 26, regardless of if the roadways or intersection is located in an urban reserve area. As the area urbanizes and significantly more traffic uses Highway 212 to gain access to Highway 26, corridor and intersection improvements such as raised medians, turn lanes, and additional travel lanes on Highway 212 will likely be necessary.

The County's recommendation classifies the southern half of the Highway 212 corridor and intersection with Highway 26 as "rural land," and the current version of the Transportation Planning Rule establishes significant restrictions on transportation improvements on rural lands. OAR 660-012-0065. Therefore, our ability to improve these regional transportation facilities in the future will be unnecessarily difficult.

The fiscally responsible solution is to adhere to the region's policy of urbanizing transportation corridor's and the County's practice of "double loading" roadways, and extending the urban reserve designation along Highway 212 corridor so that urban development is allowed one lot deep.<sup>2</sup> In the alternative, we request that the property abutting the south side of Highway 212 be removed from the rural reserve and left undesignated so that in the future the County's and Metro's hands are not tied when planning and investing in transportation improvements along this critical corridor.

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<sup>2</sup> We suggest that the "one lot deep" measure of the depth of the urban reserve corridor coordinate to the measurements that have been historically used in the "United States Public Land Survey" (aka "Rectangular Survey System"), the surveying system that was used to map Oregon prior to statehood, and which early conveyances of property typically followed. This is the system that created 640 acre sections that are described by Section, Township, and Range. As applied to the Highway 212 corridor, Highway 212 is the dividing line between sections. If the north half of the north half of the sections that abut the southern edge of Highway 212 are designated as urban reserves the corridor would be approximately 1,320 feet deep, south of Highway 212. As shown on the attached tax map, this is the depth of many of the properties abutting the south side of Highway 212.



**There is No Factual Basis for Excluding the Land Abutting the South Side of Highway 212 from the Urban Reserve that Includes Land North of Highway 212.**

During the County's deliberations at the September 10<sup>th</sup> meeting, the primary basis for the decision to exclude this land from the urban reserve was the erroneous factual assumption that the land abutting Highway 212 to the south was large tracts of actively farmed land. Specifically, Board members believed that the land south of Highway 212 did not have as many conflicting uses and the land north of Highway 212, were primarily tracts of land over 40 acres and were actively in nursery production.

The 127 acre area that we request to be designated as an urban reserve includes the land "one lot deep" south of Highway 212 between the eastern edge of the Board's recommended urban reserve (approximately the edge of the Sunset Estates subdivision) to the intersection with Highway 26. A review of the attached aerial photo and the tax assessor's maps demonstrate that the County was wrong in its assumption about how the land south of Highway 212 is parcelized and used, including:

- There are a total of 24 tax lots ranging in size from 0.18 acres to 20 acres, when a median size of five acres. Sixty-three percent of the tax lots are less than five acres.
- When tax lots held in common ownership are combined, there are 19 ownership holdings in the 127 acre area, ranging in size from 0.18 acres to 27.83 acres. Fifty-eight percent of the property holdings are smaller than five acres, and only two of the property holdings are larger than 20 acres.
- Only 2 of the 24 tax lots are currently under special farm-use assessment.
- The area's zoning is roughly split equally between Rural Commercial (RC), and Rural Residential Farm Forest – 5 acres (RRFF-5) (49%) and Exclusive Farm Use (EFU) (51%).
- Based on the aerial photos, it appears as if none of the tax lots abutting the south side of Highway 212 is in active farm use.

The property south of Highway 212 is actually more parcelized and less farmed than the land north of the Highway. There is simply no factual basis for the County's disparate treatment of the land abutting the south side of Highway 212. The entire Highway 212 corridor should be designated as an urban reserve. In the alternative, we request that the property abutting the south side of Highway 212 be removed from the rural reserve and left undesignated. Otherwise, the County would have failed to recognize the actual facts on the ground in favor of rigidly designating land as rural reserve because it is considered foundation agricultural land. Such a dogmatic adherence to soil type, despite the compelling financial and long range planning objectives, is inconsistent with the purpose of SB 1011.

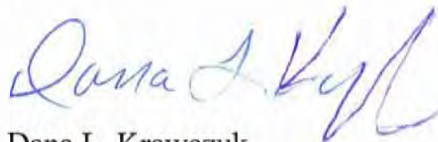
### **Separation of Communities Can be Maintained**

The County has also expressed a desire to accommodate the City of Sandy's desire to maintain a separation of communities between Metro and the City of Sandy along Highway 26.<sup>3</sup> Our request to allow urbanization south of Highway 212 is a de minimis extension of development that will be allowed along Highway 26. At the time of concept planning and development, there are tools available to visually mitigate any development at the southwestern quadrant of the intersection of Highway 212 and 26, including orienting structures away from Highway 26, restricting signage and access onto Highway 26 and requiring buffer areas and screening.

### **Conclusion**

We request that the County take a regional perspective and balance the desire for separation of communities with the need to have a functioning urban transportation system. Our request to include the southern half of the Highway 212 corridor in the urban reserve area, or to leave it undesignated, accomplishes both objectives. Urbanization will be allowed up to a key urban intersection, which will facilitate needed transportation improvements. Any visual impact of urban development from Highway 26 can be mitigated, and the remainder of the corridor between the existing UGB and the City of Sandy will remain as protected agricultural land (either as a rural reserve or with existing EFU zoning).

Sincerely,



Dana L. Krawczuk

Attachments: Aerial photo of Highway 212 corridor from SE 282<sup>nd</sup> to Highway 26  
Tax Map of Highway 212 corridor from SE 282<sup>nd</sup> to Highway 26

cc: Metro Councilors, Kathryn Harrington and Rod Park  
Reserves Steering Committee

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<sup>3</sup> Our previous testimony has explained why the 1998 IGA between Sandy, the County and Metro, which pre-dates the inclusion of Damascus in the Urban Growth Boundary, does not require Highway 26 to be designated as a rural reserve, as contemplated by SB 1011. The intent of the IGA can be met with the visual mitigation measures described.



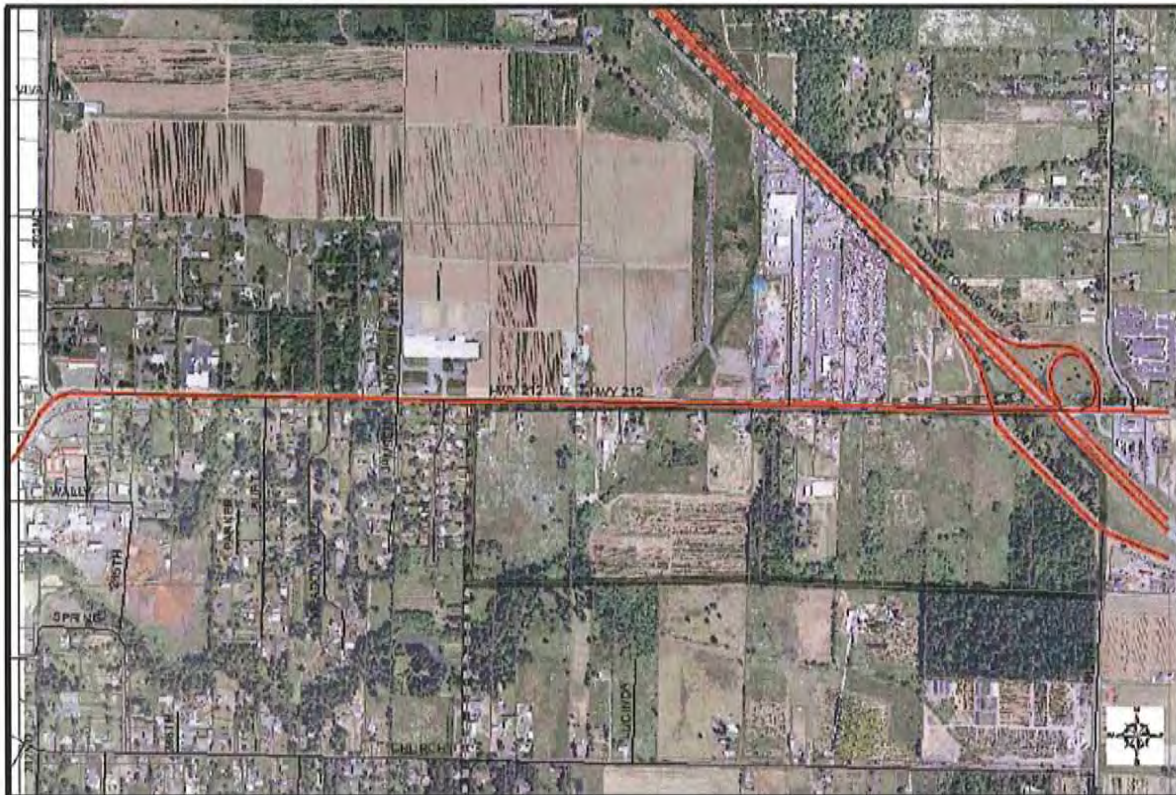
### East of Damascus / Clackanomah URA



 BCC Recommended URA  Proposed Addition to URA

Prepared using August 2009 RLIS data provided by Metropolitan Service District

### East of Damascus / Clackanomah URA



 BCC Recommended URA  Proposed Addition to URA

Prepared using August 2009 RLIS data provided by Metropolitan Service District.

Date: October 14, 2009

To: Core 4 and Reserves Steering Committee  
c/o Laura Dawson Bodner  
Metro  
600 NE Grand Ave.  
Portland, OR 97232

Core 4 and members of the RSC,

My name is Carol Chesarek. I was a member of the Multnomah County Reserves Citizen Advisory Committee (CAC). I want to summarize some information about the Lower Springville Road area.

Multnomah County Reserves Citizen Advisory Committee studied the **Lower Springville Road area (UR-1)** and found it to be only low to medium suitability for Urban Reserves. Multnomah County staff also rated the area low to medium suitability for Urban Reserves.

The CAC recommended that the area be designated Rural Reserve to protect natural features in the area. The CAC recommendations were endorsed by the Multnomah County Planning Commission.

This area, and all of the West Hills in Multnomah County, is so unsuited for an urban road network that it was NOT RATED for transportation in the Urban Reserve Transportation Study.

Here is a list of organizations and individuals who oppose an Urban Reserve in this area and have requested that the area be a Rural Reserve:

Neighborhoods: Forest Park Neighborhood Association (includes this area)  
CPO-7 (adjacent Washington County)  
Hillside (Portland)  
Northwest District Association (Portland)

Other organizations: Forest Park Conservancy  
SaveHelvetia

Individuals: 29 Residents of Springville Road Area, including Malinowski Farms  
Beovich Family, who farm 94 acres on Springville Road

No city has requested an Urban Reserve here. The area is not adjacent to either City of Portland or City of Beaverton, and Multnomah County has a policy of not providing urban services, so governance is a serious problem. Beaverton's city limit is more than 2 miles away, and their City Council has a policy of not annexing any territory without 100% property owner approval.

The Great Communities Study looked at this area and says:

"The team concurs that preservation of this important ecological area is likely more important to the region than urbanizing it, especially given the other constraints (lack of connectivity and developable land area) and significant opportunities (water quality and view)."

Please help the Core 4 focus on useful Urban Reserve candidate areas -- tell the Core 4 to take the Lower Springville Road area (UR-A) off the "needs further discussion" list for Urban Reserves.

Thank you.

Carol Chesarek



Eli Spevak  
6325 N. Albina Ave. #6  
Portland, OR 97217  
(503) 422-2607

**Reserves Steering Committee  
CORE 4 Members  
Metro Regional Center  
600 NE Grand Avenue.  
Portland, OR 97232**

**October 14, 2009**

**Attention: John Williams, Land Use Planning Manager, Reserves Staff**

My name is Eli Spevak. I am owner/principal in the real-estate development and general contractor firm Orange Splot LLC. My company is located in Portland and has been in business since 2006. Before starting my own company, I worked for the Housing Development Center where I managed the development of over 250 units of affordable housing, typically in multifamily projects of 25 – 60 units.

My company's niche is the development of green, community-oriented, residential in-fill projects in N/NE Portland. We are known for our commitment to green buildings, sustainable development practices, and innovative models of relatively dense in-fill development that fit in beautifully with existing neighborhoods. These projects include fairly compact homes accompanied by interior and exterior common spaces shared by all residents. They have been extremely well received – selling out immediately and being featured in local and national magazines and Portland's annual Build It Green! home tours.

All of our projects are located in existing centers for two primary reasons: (1) it is extremely important to our clients/buyers that they live within easy walking or biking distance to urban amenities and (2) by building within existing centers we can accommodate population growth without having to expand the UGB into productive and beautiful farm and forest land – which is a core value of both my company and our clients.

We've been consistently successful at finding close-in property with un-tapped density on which to build our projects. In the current market there are far more suitable properties available in N/NE Portland with development potential than we have the capacity to pursue, and looking ahead we see no lack of appropriately zoned land to keep us and other in-fill developers busy for decades. Our success, branding and marketing is in no small part due to smart land use planning and a commitment to complimentary public investments within the UGB.



My message to you today is simple: be very cautious about how much urban land we commit to for urban reserves. Indeed, in my ideal world, we would leave the urban reserves as they are today. I am concerned that by adding too much land we will dilute the region's scarce resources and existing investments in parks, libraries, schools, transportation infrastructure and utilities that make our communities livable and equitable places in which to live. We need to make sure that our priority is to use and reuse the land, buildings, and infrastructure we already have more effectively. All market indications are that we will need to do more to invest in our existing centers and corridors, not less.


Your work is also very important to the success of my small company. We have grown from building 4-home clusters to 8-home clusters, and rely on continued public investment in maintaining the infrastructure in existing neighborhoods to make these neighborhoods continue to be amenity-rich and accessible places where my clients will continue to want to live and work.

I am a big believer in investing in our existing centers and corridors. If we want vibrant centers and neighborhoods, investing in these locations should be our first priority. The places I work in have undergone amazing transformations for the better. We can redevelopment and reuse existing buildings in ways that are the most cost-effective, most efficient, and in the end, the most sustainable. It is also no secret that finance capital for development projects is very limited – and this is likely to continue for some time. Just like scarce public infrastructure dollars, it is essential that we prioritize. And this is one more reason that I urge you to err on the side of caution. We can always add more urban land later, if circumstances change.

In closing, let me again urge you to cautiously calibrate any amount of future urban reserves our region needs. My firm and other redevelopment colleagues in this field depend on your wise decisions.

Thank you again for your hard work.

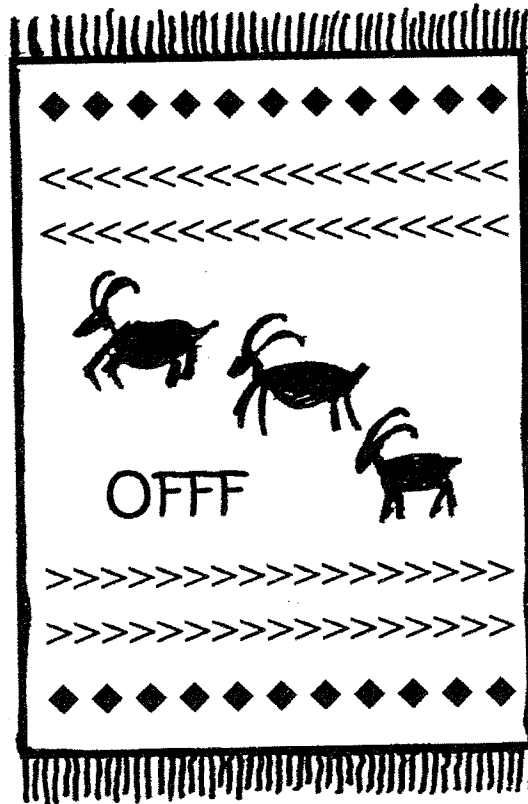
Sincerely,



Eli Spevak  
Orange Splot LLC

101409rsc-10

*Oregon Flock & Fiber Festival*



**September 26 & 27, 2009**

Clackamas County Fairgrounds  
Canby, Oregon

[www.flockandfiberfestival.com](http://www.flockandfiberfestival.com)

My name is Jan McMahon. I live at 17548 S. Steiner Rd. in Beavercreek. I have lived at this location for 20 years and am a small part time farmer. I would like to talk to you about the importance of protecting our farmland. Last year Beavercreek had over 1,000 Special Assessed Farm and Forestland claims. Some are large full time operations but many are part time so called hobby farms.

There is an emerging local food/product movement fueled mainly by part time farms in our area that is gaining strength and popularity every year. They not only sell food at farmer's markets, buy direct, grocery stores etc., they are creating many new nitch markets as well.

The 13<sup>th</sup> annual Oregon Flock and Fiber Festival was held at the Clackamas county fairgrounds this past Sept. 26<sup>th</sup> & 27<sup>th</sup>.

This is a private fair put on by part time "hobby" farmers and has consistently grown in size each year. This festival is designed to celebrate fiber producing animals and the products they produce. The weekend was filled with livestock shows, workshops, vendor booths, seminars and kids' activities.

Sheep, goats, alpacas, and llamas filled both barns. Over 160 vendor booths sold anything animal, fiber, or handcraft related. It draws vendors and exhibitors from all over Oregon and Washington and as far East as Montana and Minnesota and as far South as Southern California.

The crowd was estimated at 10,000 this year and all 3 parking lots had to be opened.

One farm vendor who sells lamb at farmer's markets had a food booth that sold over 1,350 plates of *locally* produced lamb.

In addition, many festival attendees shop and eat at local restaurants and stay at nearby hotels in Wilsonville. This is *real* money going directly back into *our local* economy.

With the success of local farmer's markets and festivals such as this, it is clear that urban residents want *access* to and *want to buy locally produced farm products*.

The threat of urbanization in Beavercreek is very real. Please do all you can to help protect our farmland and our natural landscape features.

Thank you for you time and careful consideration.

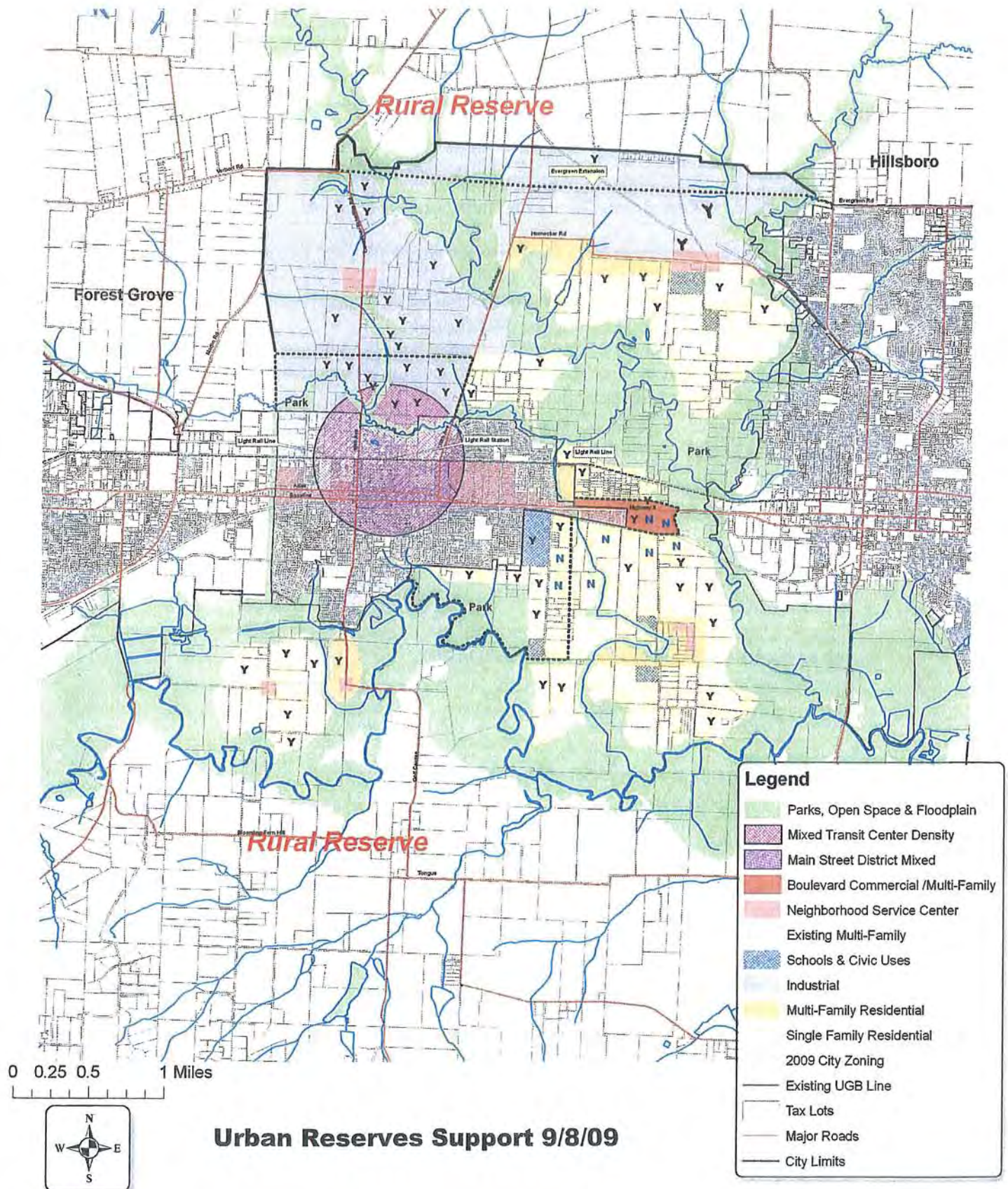


Survey Results as of 9/8/09

Owners of Large Lots Within  
Recommended Urban Reserve Area

# City of Cornelius Example 50-Year Concept Plan

**Y** 30 Farm Families Support  
**N** 1 Farm Family Opposes  
 Urban Reserve





# CITY OF CORNELIUS

September 8, 2009

Washington County and Metro Regional Reserves Committees  
c/o Washington County Long Range Planning  
155 N First Ave., Suite 350, MS14  
Hillsboro, Oregon 97124

Testimony: Rural Large Lot Owner Support of Urban Reserve Designation

Dear Reserve Steering Committee, County Commissioners, and Regional Steering Committee:

Cornelius recently surveyed large lot property owners within the rural area around Cornelius recommended for a 50-year Urban Reserve. All respondents to date, except one (33 to 1) favor an Urban Reserve Designation for their properties as opposed to a Rural Reserve Designation. Representative property owner responses are quoted below.

"I wish to preserve my options. I do not plan to subdivide during my lifetime, but would like my children to be able to maximize their inheritance."

Reinard B & Shirley M Okeson  
34520 SW Cook Rd  
Hillsboro, OR 97123

"We should be able to enhance our properties to accommodate the growth in the region in one way or another."

Lloyd Duyck  
2170 SW LaFollett Rd  
Cornelius, OR 97113

"We are on border of EFU & property is too small to farm."

Greg & Jeannie Peters  
1990 SW LaFollett Rd  
Cornelius, OR 97113

"Locking in for 50 years is a long time without options."

Donald L. Claeys  
19813 NW Metolius Drive  
Portland, OR 97229

"The Washington County Farm Bureau is affirming that ALL the farmers in the area wish their properties in the 50 year agricultural reserve. This is not true about the Van De Moortele farm, which I would prefer to have placed in the urban reserve. This allows the family to have the option of being sold at a profit or continue on as a farm. Is also gives the City of Cornelius the option of increasing land available to its community for homes, industry, or business."

Ruth Anne Van De Moortele Dean  
NW Susbauer and NW Long Roads  
Cornelius, OR 97113

"I have heard that the Farm Bureau is stating that all the farmer want their property zoned into the 50 year Agricultural Reserve. I would like to have my farm zoned in the 50 year Urban Reserve. It would allow me to continue to have it farmed as long as I choose. It would also allow my daughters who will inherit the land to have some choice when I pass away. They are not farmers."

Ruth Van De Moortele  
Jennings McCall Assisted Living  
221 Oak St.  
Forest Grove, OR 97116

"I think that Cornelius, which has always been supportive of its agricultural foundation and surroundings, can have some room to grow and continue to be a good neighbor of our agriculture businesses. This will not hurt farming in Washington County and will be a big boost to Cornelius"

Walt Duyck & Tim Duyck  
1640 NW Cornelius-Schefflin Rd  
Cornelius, OR 97113

"We own a number of large parcels within the area recommended as Urban Reserve. This includes acreage north of Council Creek, Dairy Creek and near McKay Creek. We support the Urban Reserve designation recommended for our land north of Cornelius."

Melvin and Marie Finegan  
5750 NW Glencoe Rd  
Hillsboro, OR 97124

"We own over 30 acres of land west of Susbauer Rd. that is partially urbanized with our meat packing business. We have farmed the vacant part of our land with field crops like hay and have never been able to even cover our property taxes with our farm profits. We urge the county and Metro to designate this land north of Council Creek Urban Reserve and add it to the Urban Growth Boundary this year."

Letha & Harry Jacobsmuhlen  
1395 NW Susbauer Rd.  
Cornelius, OR 97113

"I would like all my 364 acres southeast of Cornelius off 345<sup>th</sup> Avenue to be designated Urban Reserve and added to the Urban Growth Boundary for urban development as soon as possible."

Michael Speer  
16830 SW Sarala St  
Beaverton, OR

Survey response indicates a desire for a 50-year Urban Option for their property.

Alan & Mary Jesse  
16520 SW Midway Rd  
Hillsboro, OR 97123

"No more canneries or processors in county, very limited products to grow or sell. No markets, too much traffic to move machinery. We have farmed on 331<sup>st</sup> since 1952. Times do change, sorry to say."

Helen VanDyke  
1000 SW 331<sup>st</sup> Ave  
Hillsboro, OR 97123



"I believe our property is in close proximity to the city of Cornelius and it would be a logical direction for the city to grow."

John G. Krautscheid  
508 NE Birchwood Ter  
Hillsboro, OR 97124

"..please consider including our Urban Reserve Property in the next Phase of the UGB expansion."  
*3/16/09 letter to Kathryn Harrington, Metro District 4*

"Our property (6.75 acres) meets and exceeds the criteria for consideration of the UGB."

Barbara Hadley & Karen Palenik  
33442 SW TV Hwy  
Hillsboro, OR 97123

"Options are always better than not." In favor of 50-year Urban Option.

Katherine Henmen  
Kraft Pact LLC  
1600 Hobbs Road  
Cornelius, OR 97113

Survey response indicates a desire for a 50-year Urban Option for their property.

Dick and Sue Hertel  
33650 NW Hornecker Rd  
Hillsboro, OR 97124

Survey response indicates a desire for a 50-year Urban Option for their two properties.

Edward & Christine Sahlfeld Trust  
31960 NW Hornecker Road  
Hillsboro, OR 97124

Survey response indicated a desire for a 50-year Urban Option for their property noting reasons of  
"flexibility & poor commodity prices."

Anonymous

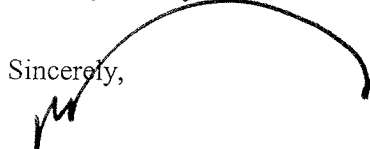
Survey response indicates a desire for a 50-year Urban Option for their property.

George & LeAnn Rose  
2626 SW 325<sup>th</sup> Avenue  
Hillsboro, OR 97124

Thank you for your consideration of property owner preferences in our area of the region.

Thank you for your public service.

Sincerely,



Richard Meyer  
Cornelius Development & Operations Director

# COMMENTARY

LETTERS TO THE EDITOR, COLUMNS AND

THE OREGONIAN • MONDAY, AUGUST 3, 2009

## THE URBAN GROWTH BOUNDARY

# Denying smaller cities the benefits of growth

In the face of a projected population increase of 1 million people by 2030, Metro is making the case that the existing urban growth boundary contains enough land for the next two decades of regional growth. Its case is based on debatable assumptions about which areas will capture how much population and employment growth, as well as a vision of higher-density living.

By nixing UGB changes and focusing on increasing density to accommodate growth, Metro narrows its vision to the region's

largely complete, increasingly self-sustainable big cities, mainly Portland. This myopia causes Metro to ignore

the needs — especially the differing needs — of the region's less complete, less self-sustaining smaller cities, such as Cornelius in western Washington County.

Economically speaking, Cornelius is a state-certified "severely distressed" city. We have the highest poverty rate, lowest market value of land and its improvements, and the highest minority population proportion among the 27 jurisdictions in the region. We are also up to date with smart-growth plans and well-versed, committed local leadership. We have been up against the UGB wall for several years now with our growth stunted. A Metro growth strategy that chants "Up! Not Out!" and rejects boundary expansion outright denies cities such as Cornelius the very resource they require to become complete — both in jobs and housing — and self-sustaining.

Metro says it wants an urban environment in which people can walk or bike to work. Cornelius has fewer than half the jobs needed for its residents to be able to work close to home. So the majority of Cornelius workers commute an average of 56 minutes per workday. More industrial land is

needed to achieve a better balance between jobs and housing and to reduce contributions to global warming.

Metro says it wants an equitable distribution of growth's benefits and burdens. Yet its preference for expensive one- or two-person high-rise condominiums trumps space for affordable housing options for Cornelius' three- or four-person households. Metro's strategy heaps employment growth in regional centers that are long commutes away and do not include affordable family housing. For lack

of room, jobs are not moving to Cornelius, and Cornelius' families cannot afford to move to the jobs. If this isn't a Catch-22, it's close.

This strategy of increasing densities severely limits the ability of Cornelius and other small cities to reap the benefits of growth.

In most areas of human endeavor, "one best way" and "one size fits all" have been abandoned as ineffective, inefficient and rife with negative unintended consequences. Given the region's successful history of creativity in balancing population growth with preserving natural areas, couldn't the region be as well-served with an approach that sustains all cities so that they can each contribute to the good health of a diverse region?

Metro was prepared to see the Happy Valley-Damascus area urbanize. It seems odd to deny cities such as Cornelius the use of targeted, timely expansions of the urban growth boundary to jump-start their journey to full membership among the region's largely complete, self-sustainable great cities.

With a little more land, Cornelius can be a great little city.

Bill Bash is mayor of Cornelius. Dave Waffle is city manager. Richard Meyer is development and operations director.

**BILL BASH, DAVE WAFFLE  
and RICHARD MEYER**

IN MY OPINION



*Linda Peters*  
25440 NW Dairy Creek Road  
North Plains, OR 97133  
503.647.2301lbpete@earthlink.net

October 14, 2009

To: Metro Reserves Steering Committee and "Core 4"

Re: Thoughts on Urban Reserve process and remaining decisions

I left office as Washington County Chair ten years ago, feeling some sense of accomplishment. I'd coined the term Smart Growth for my 1990 campaign, championed it as a citizen activist, Board member, MPAC member, and on the National Association of Counties' Sustainability Committee. There was hope, I thought, that our Board and Staff would continue--without my prodding--to effectively involve citizens in all stages of planning, and honor the vital interconnections between healthy rural and urban economies.

Today I look with a heavy heart at Washington County's Reserves designation process and recommendations. I'm reminded of the old saw about the fox guarding the henhouse. NAIOP interests are well represented in Washington County Reserve Coordinating Committee's (WCRCC's) framing of issues and in their report --not surprisingly, since NAIOP funded some of the technical work.

Citizen interests were under-represented in committee makeup, in staff's choice to prioritize Urban Reserve over Rural Reserve needs where lands qualify for either designation, and in resulting recommendations. No Citizen Participation Organization had a vote on the Committee. Staff's September 8 Issue Papers trivialize and dismiss citizen-submitted research and comment, particularly regarding the area north of Highway 26. Remarkably, the Washington County Board of Commissioners held no hearings and took no action on the draft recommendations.

Historically, in this region, there are two main ways that urban sprawl overtakes productive uses of natural resource lands:

1) Major UGB expansions: Corporate development interests--often led by industry associations--heavily influence State, regional and local policy making, so that planning is often framed around their economic objectives and perceived needs. The resulting expansions sometimes exceed actual needs, damaging rural communities and threatening long-term regional livability.

2) Incremental creep: Parcel-by-parcel, Boards and Councils accept well-packaged proposals to urbanize or annex specific properties. The properties may be owned or pitched by familiar voices, even former staffers. As each small addition creates a new urban edge, *their* adjoining lands attract investors who buy and lease back to farmers, awaiting the next opportunity to promote this development-ready and easy-to-serve property.

You have proposals of both types before you today: 1) WCRCC's draft recommendations for Urban Reserves; and 2) the packet from Mark Greenfield, the Angelo Planning Group, et.al., pushing Urban Reserve designation of the Standring/Hartung/Berger/Choban properties..

I urge upon this body the restraint Michael Jordan recommended in his September 15 COO Report. Please do not buy into the notion that urban land needs trump rural land needs. Our rural "henhouse" gives this region such golden eggs: beautiful and productive farmland and forests, natural areas and wildlife, accessible outdoor recreation, and the resources we need for an uncertain economic future.

Please don't squander such valuable resources for just a few more industrial plants that--with political will and good design-- can be located on existing urban land.. Rural lands are our best and most versatile resource for meeting those challenges. They require our--and your--protection.

Thanks for the opportunity to comment today. I wish you courage and wisdom as you work through these complex decisions.



Oregon  
Department  
of Agriculture



Oregon Land Conservation  
and Development



State of Oregon  
Department of  
Environmental  
Quality

October 14, 2009

Metro Regional Reserves Steering Committee  
Core Four  
600 NE Grand Avenue  
Portland, OR 97232

Re: State Agency Comments on Urban and Rural Reserves

Dear Reserves Steering Committee and Core Four Members:

The Oregon Departments of Agriculture, Forestry, Transportation, Business Development, Fish and Wildlife, Environmental Quality, Water Resources, State Lands, and Land Conservation and Development are pleased to provide the Reserves Steering Committee and the Core Four with our collective comments on the region's tentative proposals for urban and rural reserve designations. The region's ground-breaking effort to envision its long-term future management of urban and rural lands is an exciting experiment that is illustrating new ways to build great communities and lay the foundation for sustainable agriculture, forest management and natural resources protection.

In developing these comments, it is important to note that we are responding to *preliminary* recommendations from each of the three counties and from Metro staff. The counties and Metro have yet to make final decisions concerning either the amount or location of urban or rural reserves. We all appreciate the substantial work that has gone into this important effort, including countless hours of public involvement, and we recognize that the final product will continue to be refined and to evolve over the next few months.

The state agency comments focus on *state-level* interests in how the Portland Metro region will accommodate the projected 1.3 to 2.1 million additional people that will live and work in this area over the next fifty years. Other members of the Steering Committee, appropriately, will focus on regional and local considerations. Metro and the three counties will need to consider all three levels of interests in reaching their final decisions about urban and rural reserves.

Finally, each of the nine state agencies represented in the Reserves Steering Committee has a particular set of responsibilities and duties. These collective comments were not arrived at lightly, and reflect significant discussion and work to resolve competing policy interests and to provide Metro and the counties with clear, consistent recommendations. We have appreciated the opportunity to participate with others from the outset as you work to guide the region's long-term future.

## **I. General Comments**

This section of the agencies' collective comments contains two parts: (A) our suggestions for key additional information or interim decisions that should be developed before final decisions are made; and (B) our high-level, policy-oriented comments that are not related to specific areas or locations.

### **A. Additional Information**

The reserves effort has generated a substantial amount of analysis and information for decision-makers. Nevertheless, the agencies recommend that Metro and the counties develop or clarify the answers to certain key questions before making final decisions regarding urban and rural reserves.

#### **1. Clarify What Period of Time Reserves Are Being Established For**

Urban reserves must be designed to provide a supply of land needed for population and employment over a forty to fifty-year period. Rural reserves are protected from urban development for a period equal to the period used for urban reserves. Metro and the counties need to clarify what period they are planning for. There are important policy questions associated with this choice, and the agencies' recommendation on this question is provided below at page 3.

#### **2. Identify the Major Variables that Lead to Differing Estimates of Urban Land Need**

Metro and Washington County each have produced different estimates of urban land need over the next fifty years. Although we believe that the Metro COO and



Washington County estimates of land need are not all that far apart, we also believe that it would help the transparency of decision-making for Metro and/or Washington County staff to identify the major factors that lead to differing estimates of land need. In addition, Metro should clarify the assumptions used regarding housing and employment density in urban reserve areas. Clackamas and Multnomah Counties should also participate publicly in addressing the question of overall urban land need for the region.

### **3. Transportation Modeling**

The counties and the Metro COO have used different methodologies to analyze transportation system feasibility and cost, making comparisons among the jurisdictions difficult to evaluate. The agencies strongly encourage Metro to do transportation modeling for proposed urban reserve areas, to analyze the performance of existing state highways and county and city transportation facilities, both within the existing UGB and outside the UGB in the Urban Reserve Study Areas. This would help identify significant problem areas and make adjustments in the final locational decisions for urban reserves. Metro and the Reserves Transportation Working Group performed an analysis of the feasibility and relative cost of developing a complete urban transportation system in the various candidate Urban Reserve Areas, but this analysis did not consider the capacity of existing rural facilities, nor the impact of additional growth on facilities within the current UGB.<sup>1</sup>

### **4. Constrained Water Supply**

Do the areas being proposed for future growth have the water supply capacity to support the proposed urbanization given likely competing environmental requirements, including the recovery of threatened and endangered fish species? One of the considerations in determining where regional growth should be encouraged is the long-term carrying capacity of different parts of the region in terms of water supply. This includes the sources of water (surface and ground water) and the infrastructure to provide the water. Do the likely service providers for the proposed new urban reserves have the ability to meet the projected water need/demand over the next 50 years without having to seek additional sources or volumes of water? Increased urban development creates demand for water use which commonly results in political pressure to “compromise” the instream water needs of fish to meet societal and economic demands for water. However, many of the streams currently supporting listed salmonid populations are already over-allocated, don’t meet water quality standards, or have very limited supplies of available water for future appropriation. There are differences

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<sup>1</sup> To substitute for transportation modeling, ODOT conducted a simplified method to identify specific areas of concern. We identified facilities, both outside and inside the current UGB, that are experiencing and/or are forecast to experience capacity, safety, and/or geometric problems *without* any additional urban growth. Then we identified order of magnitude relative costs and feasibility of overcoming those existing problems. Presumably, if a transportation facility is already forecast to have capacity deficiencies, then plan amendments allowing additional urban growth relying on that facility would result in additional congestion and safety problems that will lead to the need for mitigation or create costs for the state and/or for local jurisdictions.

between different parts of the region in terms of the possible availability of additional water.

## **B. General High-Level Policy-Oriented Comments**

### **1. The Time Frame for Urban and Rural Reserves**

The state agencies strongly support using the lower end of the planning period authorized for reserves – e.g. forty years. We are facing a time of extraordinary uncertainty in how our communities and industries will evolve. A receding demographic peak, rapid globalization, immigration, climate change, and changes in energy pricing all may require that we be able to adapt more rapidly than we have in the past in terms of how we live, work and travel. Reserves require a balancing between the advantages of providing long-term certainty (for landowners, local governments, public and private investment) and the disadvantages of inflexibility if conditions change in unexpected ways.

Given the global and local uncertainties facing us (as reflected, in part, by the large ranges in Metro's population and employment forecasts) we believe the region should strike a balance that tends toward the risk management/flexibility end of the scale rather than locking up most of the lands on the periphery of the UGB for fifty years. An additional reason to plan for uncertainty is that this is the first time any government in the state (or nation) has set this type of long-term constraint on how it will manage surrounding lands. One way of providing for some flexibility is to set reserves for a forty-year period, and simultaneously plan to revisit whether additional reserves should be designated well before that forty-year period expires (a twenty or twenty-five year "check-in").

### **2. The Amount of Urban Reserves**

The state agencies support the amount of urban reserves recommended by the Metro COO. That recommendation is for a range of between 15,000 and 29,000 acres. We believe that Metro and the counties can develop findings that, with this amount of land, the region can accommodate estimated urban population and employment growth for at least 40 years, and that the amount includes sufficient development capacity to support a healthy economy and to provide a range of needed housing types.

State law requires that Metro demonstrate that lands within the existing UGB cannot accommodate housing and employment needs before the UGB is expanded, even if the expansion is onto urban reserves. As a factual matter, almost all population and employment growth in the region in recent years has occurred on lands within the existing UGB (and not on lands recently added to the UGB). With the challenge of financing infrastructure likely to increase, national demographic trends that point toward an increasing emphasis on mixed-use land use patterns tied closely to alternate

transportation modes and cultural amenities, and the need to move toward settlement patterns that reduce greenhouse gas emissions by reducing automobile travel, the agencies support Metro's emphasis on redevelopment and infill.

State law allows for additional urban and rural reserves to be designated in the future if it turns out that the rate of absorption of land outside of the UGB is higher than expected. The converse is not true: once lands are designated as rural reserves they must remain in that status. Similarly, once lands are designated as urban reserves they are unlikely to be managed for the long-term investments needed for working farm or forest operations. All of these considerations counsel for Metro and the counties to designate an amount of urban (and rural reserves) toward the lower end of the range in which they have policy discretion.<sup>2</sup>

### **3. The Importance of Adequate Employment Lands**

At the same time that the agencies encourage Metro and the counties to work toward the lower end of the range for the overall amount of urban reserves, we also wish to emphasize the need for an adequate supply of employment lands in the Metro *urban growth boundary*. The Metro region often 'seeds' traded-sector technologies and businesses that disperse throughout the state. Assuring that there is enough diversity in sites for such users to provide for varying needs (infrastructure, site specific characteristics, utilities, access to labor force, clustering near like employers, and market choice), is important to the long-term economic health of not only the region, but the entire state.

### **4. Spillover Effects**

While the agencies believe the amount of urban reserves recommended by the Metro COO is (or can be made) sufficient to accommodate long-term population and employment growth, we also wish to emphasize that great care is needed to assure that the region continues to capture at least the same share of population and employment growth in the larger seven-county surrounding area that it has historically (that appears to be the assumption in the 50-year forecasts being used by Metro). That care translates into a long-term commitment to fund and manage efficient urban growth within the existing regional UGB and any lands added to the UGB. If the region fails to take the measures needed to accommodate growth, population and employment will overflow into surrounding areas (primarily Clark County and the I-5 South Corridor), that would put tremendous pressure on transportation infrastructure and likely move neighboring cities further toward a bedroom-community character (a result that is undesirable for many different reasons).

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<sup>2</sup> We recognize that the range recommended by the COO already is below the amount identified by Washington County.

Spillover effects are already taking place and putting pressure on the transportation infrastructure due to urban growth expansions in areas that were ill-suited to urban growth (Damascus being the most prominent example). OBDD is concerned that the metro area will lack in large-lot industrial properties if the low end of the COO urban reserves is adopted. These factors could lead to significant spillover and undermine the regional UGB along with the significant infrastructure investments in the region.

## **5. The Amount of Rural Reserves**

The state agencies believe that too much land is proposed as rural reserves in the current, preliminary, recommendations from the counties. Rural reserves are intended “\* \* \* to provide long-term protection for large blocks of agricultural land and forest land, and for important natural landscape features that limit urban development or define natural boundaries of urbanization.” Rural reserves are appropriate for lands that are under threat of urbanization. They prevent urban-density development, but they do not provide additional protection for natural resources, and they should not be applied to agricultural or forest lands that have a low likelihood of urban development. In general, the approach used by Clackamas County is consistent with how the agencies believe rural reserve designations should be used (to “steer” urban development away from or toward particular areas, rather than as a blanket treatment of everything that is not an urban reserve).

## **6. Equity and Efficiency Concerns in Deciding Where and How the Region Will Grow (Population and Employment)**

Metro has a responsibility to allocate land needs by geographic area within the region to meet long term needs for population and employment. We understand that this responsibility is complicated by the reserves process. Metro and the counties should first achieve consensus on how much lands the region will need for population and employment, and then (separately) decide how those lands should be allocated between the three counties. In making these regional-scale decisions, Metro and the counties need to keep both housing equity (Goal 10) and employment (Goal 9) considerations (including the aspirations of individual communities) in mind as well as fiscal equity and environmental justice in determining how to distribute urban reserve areas across the region.

Each county should address housing equity and employment considerations by having some reconciliation of the supply and demand for housing and employment uses as part of their submitted analysis. Metro has done this on a macro level, but should supply the counties with the adequate tools to address these issues on a sub-regional basis.

A related concern is that different parts of the region will grow at different rates. If the differences are substantial and sustained, Metro and the counties should anticipate revisiting reserve designations in twenty to twenty-five years to adjust reserve designations and policies to respond to such trends and to correct regional imbalances.

## **7. Measures to Implement Urban Reserves**

The agencies appreciate Metro's formulation of clear "Strategies for a Sustainable and Prosperous Region." We strongly support the concepts of "making the most of what we have" and setting higher thresholds for serviceability of lands prior to their inclusion within the Urban Growth Boundary (UGB). ODOT requests that preparation of Interchange Area Management Plans (IAMP) be an integral part of any Concept Plans for Urban Reserve areas that encompass existing rural interchanges (or that generate a need for a new interchange). ODEQ urges municipalities to consider adopting or expanding current regional watershed plans to guide development in environmentally sustainable ways, and minimize impacts on streams and rivers.

## **8. Minimizing the Transportation-Related Costs of Growth**

The Regional Transportation Planning process has shown that even within the current Metro UGB, transportation needs far outweigh ODOT's and local jurisdictions' ability to fund them. It is important that the amount of urban reserves be limited to only the amount that is necessary, and that these lands be located strategically so as to:

- a. Maximize efficient use of existing and planned state and local transportation facilities,
- b. Reduce reliance on state highways by maximizing the ability to provide for a well-connected multi-modal local transportation network, and
- c. Minimize the need for additional highway improvements.

## **9. Assuring that New Development Will Support State and Local Transportation Systems**

Metro, the cities and the counties should assure that they collectively have mechanisms in place to assure that new development will contribute to local systems and state highway improvements that are needed to serve the new development. This includes bringing the existing highways up to urban standards, adding bike lanes and sidewalks, improving geometric and safety deficiencies, grade-separating intersections on expressways, widening arterials to 4 lanes plus turn lanes, and widening freeways to 6 lanes plus auxiliary lanes.

## **10. The Cost of Redevelopment and Infill**

High density urban redevelopment and infill will not be inexpensive. Public infrastructure and development costs for South Waterfront's first phase totaled \$195 million with an estimated price tag of another \$145 million for its second phase. Metro has indicated that urban renewal and other funding mechanisms (TIF's, assessments) will be needed to meet objectives for accommodating growth within the existing UGB. Brownfield redevelopment funding and related partnerships are also available resources to communities. The agencies are supportive of redevelopment and infill, but the costs



associated with refill can be substantial and should be weighed against the costs of expanding into the urban reserves. Metro and the counties are required to adopt measures to implement urban reserves; these measures should include provisions to assure that infrastructure requirements and costs (and cost allocations) are detailed *before* lands are included in the regional UGB so that clear market signals are sent, and so that land prices appropriately reflect the costs of development. Required planning for infrastructure, public facilities and environmental protection before these areas are brought into the UGB will also help assure that only those lands that can add significantly to the regions' ability to accommodate population or employment needs are added to the UGB.

#### **11. Urban Reserves That Include Wetlands and Other Aquatic Resources**

Metro, the counties, and property owners should understand that urban reserve designations will not allow development involving wetlands or other waters to avoid state (Removal-Fill Law) and/or federal (Clean Water Act Section 404) wetland/waterway requirements to analyze practicable alternatives to avoid and minimize impacts to wetlands/waters. An urban reserve designation does not assure that the lands are developable. A cursory review by DSL staff indicates that up to 15 percent of the proposed Washington County urban reserve land is on mapped hydric (wetland) soils. While such mapping is certainly not definitive for the presence of jurisdictional wetlands and other waters, it does suggest that a sizeable portion of the urban reserve land will be subject to future discretionary reviews by DSL and the Army Corps of Engineers that may result in approval or denial of specific developments. Developments that are allowed in such areas will be subject to compensatory mitigation that may have the effect of further reducing the net developable land yielded from particular urban reserves.

The agencies encourage the counties and Metro to be explicit in their documentation and public outreach as to how important natural resource features that are included in urban reserves will remain protected for the future. This comment is not intended to advocate for less urban or more rural designations, rather, it is offered to make clear that not all urban reserves will be developable.

#### **12. The Economic Importance of Rural Reserves for Forestlands**

One purpose of the reserves process is to retain large blocks of forestlands in forest use so that future Oregonians, including urban residents, will continue to benefit from the wide range of environmental, economic, and social values forests provide. The demand for forest ecosystem services (specifically: recreation, carbon sequestration, passive-use values such as biodiversity, and water quality) is often constrained by the availability of healthy forest environments that support or provide these services. Maintaining and enhancing Oregon's forests' non-commodity contributions to state and local economies, communities, and Oregon's quality-of-life are very important to all Oregonians and recognized as important nationally. However, these values are often

taken for granted because they are not generally traded in markets. As such, they have no "price" and are therefore seemingly provided for free. Caution is needed in the Metro reserves process not to overlook or underestimate forest ecosystem service values.

As urban growth boundaries move closer to wildland forests and mixed forest and agricultural lands, there may be accelerated pressure outside the UGB for the in-filling of structures. Such outcomes can result in disincentives for continued investments in forest management and should be minimized whenever possible. Dividing the forest into smaller parcels and adding dwellings (with or without urbanization) can displace wildlife through habitat fragmentation, increase conflicts between residential and commercial forestry uses, decrease incentives to encourage forest land retention (such as forest land tax status), increase the cost of fire protection, incentivize further development pressure by an increasing disparity between forest land development property values versus timber values, and reduce the economic benefits of commercial timber production. Rural reserves should be considered as a tool to avoid this type of "halo" effect.<sup>3</sup>

## **II. Comments on the Location of Urban and Rural Reserves**

The Metro Chief Operating officer's recommendations on urban reserves divided the region into 14 geographic areas. After providing general comments about the location of urban and rural reserves, the agencies are providing area-specific comments organized to correspond to those 14 areas. In a final section, the agencies also provide comments concerning lands that should remain with their existing rural designations (and not be designated as either an urban or a rural reserve).

### **A. General Comments on the Location of Urban Reserves**

#### **1. General Comments on the Location of Urban Reserves: Transportation Issues**

It is important to designate urban reserves that can be designed to provide a complete local/regional multimodal transportation system and where the state highways either have the capacity to serve additional trips, are already planned to be improved, and/or are not excessively expensive to upgrade to urban standards in a manner consistent with the RTP Systems Development and Systems Design Concepts.

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<sup>3</sup> ODF encourages Metro and the counties to more carefully consider the economic contributions of the forest products sector to the region's economy and the potential effects of future development and urbanization on the viability of the forest products sector.

ODOT's analysis shows that the highways least suitable to accommodate additional trips and most expensive to improve, are I-5 South, especially the segment from OR 217 to south of the Willamette River, and I-205, especially the segment from the Stafford Interchange to the Sunrise/OR 212/OR 224. Both I-5 and I-205 require corridor refinement plans to identify feasible solutions. Because of the presence of the Willamette River and the lack of bridge connections other than the I-5 Boone Bridge, it would be extremely difficult and expensive to provide a network of local multimodal transportation system connections between areas south of the Willamette River and the rest of the urban area.

A significant difference between I-5 and I-205 is that I-5 is already 6 lanes and thus is considered "complete" by RTP standards, whereas I-205 South is 4 lanes and hence the planned (but not funded) facility calls for widening to 6 lanes.

US 26 West is constrained by congestion at the I-405 tunnel and the limited opportunities and large potential costs to improve that segment, but the costs of widening US 26 to 6 lanes and reconstructing a number of interchanges and overpasses at the edge of the current UGB are smaller than the costs of improving I-5 and I-205.

TV Highway is already at 5 lanes and congested. Access management has proven to be difficult to implement, and opportunities to build a local network to reduce reliance on the highway are limited due to the presence of the railroad in close proximity.

OR 213 and OR 212 are both forecast to fail to meet the Oregon Highway Plan mobility standards even when widened to 5-lanes. Topography and the presence of natural resources limit opportunities to build a complete local transportation network in the area served by OR 213. The City of Damascus is in the process of developing a complete multimodal transportation system plan for the area now served primarily by OR 212.

## **2. General Comments on the Location of Urban Reserves: Floodplains and Stream Corridors**

One significant locational issue for the counties and Metro is whether urban reserves should include floodplain areas and larger stream corridors. Some of the proposed urban reserves in Washington County include relatively large floodplain areas (e.g. along the Tualatin River, lower Dairy Creek, etc.). Clackamas County generally has worked to place larger stream corridors within rural reserves.

As a general matter, the state agencies believe that larger floodplain areas that are on the periphery of the urban area should *not* be included in urban reserves and that, instead, they should be used as a natural boundary between urban and rural areas to the extent possible. Although some development in floodplains may be possible, the overall amount of development likely to occur in floodplains does not justify their inclusion in urban reserves.

Washington County and Clackamas County appear to have taken very different approaches toward certain stream corridors. In Washington County, the preliminary urban reserves overlay or abut several current or potential salmonid-bearing streams such as Tualatin River, McKay Creek, Dairy Creek, Storey Creek and Rock Creek. In Clackamas County, the preliminary designation map generally recommends important stream corridors for rural designation (e.g., Clackamas River, Clear Creek, and Abernathy Creek). These differing approaches may lead to some confusion as to what the region's intent is regarding future stream/riparian area protections. The state agencies recommend the counties agree on a consistent approach that makes it clear to the public that important stream corridors will be protected.

### **3. General Comments on the Location of Urban Reserves: Water Supply Issues**

The state requests that an analysis of water supply capacity be completed for each proposed urban reserve prior to its inclusion with an urban growth boundary to determine if urban development will conflict with resource protection or water supply issues. The analysis would include an assessment of the following factors:

- a. Identification of the current water service provider who will provide water to the new urban area;
- b. The total supply of water currently available to that service provider (i.e. currently available through certified/proven water rights);
- c. Of the total amount of water currently available, the amount of water currently unused by the provider that could be directed to serve the new urban area;
- d. Based on the size of the area and projected population and commercial/industrial development, how much water is projected to be needed to serve the area when it is fully developed;
- e. If a deficit exists between the current water available (per existing water rights) and the projected total water demand when the area is fully developed, where does the service provider envision the additional water will be obtained?
- f. Identification of potential impacts to the quality of current drinking water supplies (such as the Clackamas River) in proposed Urban Reserves.

The current analysis of "service capacity" seems to be largely focused on whether site characteristics (e.g. topography) allow for the physical infrastructure to be put in place to service an area. It does not appear that an analysis has been completed yet to determine if the water is available to meet the needs of the additional urban growth being proposed for these areas over the very long-term.

### **4. General Comments on the Location of Urban Reserves: Impacts to Regional Water Quality**

Urban Reserves are proposed in several water quality limited watersheds, such as the Tualatin and Clackamas Rivers. Urbanization will have multiple negative impacts to the



water quality of streams and rivers. Increased sanitary wastewater discharges will have an impact on the receiving rivers, and the location and nature of the discharges can substantially alter the nature of these impacts. Increases in impervious surfaces create stormwater runoff that can impact water bodies through an increase in pollutants and changes to stream flows. In addition, the conversion of former agricultural lands can mobilize legacy herbicides and pesticides in soils, sending these toxics in the watershed into streams, rivers, and other aquatic resources. New discharges requiring a permit will need to be coordinated in advance with ODEQ. These potential effects can be greatly mitigated through coordinated implementation of watershed plans and permits.

## **5. General Comments on the Location of Urban Reserves: Suitability for Industrial Development**

Generally, to meet the regions' needs for long-term needs for industrial development, urban reserves should include lands that have:

- Clustering potential with competing and complimentary industries
- Multi-modal potential (rail/port)
- Good access to labor force
- Minimal slopes (10% max)
- Superior utility infrastructure (electric, water, gas, telecom)
- Access to major interstates, with I-5 being the most desirable
- Adequate Market Choice.

## **B. General Comments on the Location of Rural Reserves**

### **1. General Comments on the Location of Rural Reserves: Threat of Urbanization**

Regardless of whether their purpose is to protect agriculture lands, forest lands, or important natural features, rural reserves are not designed (or intended) to protect these lands from all threats – rather rural reserves are to protect these lands from *urbanization*. Proximity of land to the UGB is a measure of the degree to which lands are “subject to urbanization.” Many of the areas identified by the counties as potential rural reserves are detached from the UGB, and in some instances (particularly in Washington County) are located a great distance away. These lands are not threatened with future urban development, and should not be designated as rural reserves. Rural reserves are not a tool to be used to supplement or replace existing tools that are either in place or that are available to counties to “protect” rural lands from rural residential development and other rural uses that may conflict with agriculture, forestry, or natural resources. Proximity to major transportation corridors, interchanges, known “aspirations” and past actions further informs the analysis of areas “subject to urbanization”.

Washington County appears to be using the “subject to urbanization” factor to downgrade the importance of protecting some agricultural lands. This has led to a band of agricultural lands located around cities in Washington County being rated lower for protection as rural reserves. The ODA mapping of foundation and important agricultural lands took into account the implications of urbanization on the long-term viability of agricultural land. A great deal of foundation land shares an edge with an existing UGB. This was not accidental, such lands were reviewed and determined to be viable as agricultural lands over the long term with appropriate protection.

It is somewhat puzzling to observe how Washington and Clackamas County are applying the threat of urbanization factor to reserves. Washington County has designated most rural lands within the study area that are not proposed as urban reserves as rural reserves beyond three miles from the existing Metro UGB.

The agencies believe that the Clackamas County approach is generally more appropriate unless there is a specific showing of threat or urbanization for an area beyond three miles from the existing UGB or some other specific reason to use a rural reserve to guide the pattern of urbanization in a neighboring community (e.g., lands south of Estacada, across the Clackamas River).

At the same time, intact forestlands in the Gales Creek Canyon area northwest of Forest Grove, the Chehalem Mountains area, and the area northwest of Forest Park should be protected from urbanization through rural reserve designations. Urbanization in these areas would create environmental and economic conflicts.

## **2. General Comments on the Location of Rural Reserves: Factors**

At times counties have indicated that the rural reserve factors in OAR 660-027-0060 are a "guide" for where rural reserves should be located. The counties and Metro need to be careful to base their decisions on the factors set forth in state statute and rule. These are not “guides” that can be considered along with other policy preferences. While there is much weighing and balancing involved in determining the appropriate designations, the factors set forth in rule can’t be skirted in order to achieve other desired policies.

## **3. General Comments on the Location of Rural Reserves: Blocks and Patterns of Agricultural Lands**

The factors in OAR 660-027-0060(d)(A)-(C) need to be more carefully considered in determining the location of rural reserves. With respect to irrigation, there seems to be too much reliance on whether or not lands are located within irrigation districts. Many high-value crops are grown in the region without irrigation. Irrigation typically is not needed for several key crops (grass seed, legume seeds, hay, grapes once established, etc.). We also note that Washington County ranks lands within water-restricted areas lower. Agricultural lands with water rights in these areas should be protected (not

identified for urbanization) since they have a supply of water, and additional supplies will not likely be available. The Wildland Forest Inventory should not be used as a tool to measure the value of land for agriculture. This inventory appears to devalue most of the agricultural lands that ODA determined to be Foundation Agricultural Lands (e.g., such lands are shown as 5.99-6.76 on the county's scale). These lands are the heart of Washington County agriculture. This inventory should not be used to evaluate lands for agricultural value. A separate measure of forestry and a separate measure of natural features could be combined to determine where they overlap, but each characteristic should not be used to measure the value of another.

It appears that Washington County has given greater weight to viticulture lands when compared to other agricultural lands. This tends to devalue the bulk of the county's non-viticulture agricultural land base located in the Tualatin Valley. ODA strongly agrees that viticulture lands are an important part of the region's agriculture base. However, they do not provide the wider range of options for agriculture as do lands on the valley floor, and viticulture products do not rank higher in total value than other products grown in the county, such as nursery products, seed crops, fruits and nuts.

Washington County indicates in its report that areas of high parcelization were rated comparatively low for agricultural value, and that areas where a majority of tax lots are less than 35 acres are considered "parcelized." This 35-acre threshold is not a reasonable standard for parcelization and does not reflect the nature of farms comprised of constituent parcels and the practice of renting and leasing lands. Furthermore, the county states that it uses residential dwelling density as an indicator. This is problematic, as this analysis makes no distinction between farm dwellings and nonfarm dwellings.

#### **4. General Comments on the Location of Rural Reserves: Blocks and Patterns of Forest Lands**

ODF's spatial analyses focused on identifying forest lands within the reserves scoping area and highlighting forested areas still retaining "wildland" forest character (defined as forestlands with fewer than five existing structures per square mile) and "mixed forest and agricultural" lands (defined as intermixed forest and agricultural lands with fewer than nine existing structures per square mile). Long term retention of these two classes of forest land are viewed by the Department of Forestry as critical to maintaining forest environmental benefits such as wildlife habitat, water quality, and carbon sequestration and to maintain economically viable private ownership of productive commercial forest lands. Commercial forest land management may be more sensitive to the market signals provided by reserve designations due to the long rotation/investment periods involved. As a result, it may be more appropriate to include forest lands further from existing urban growth boundaries where there is already some evidence of large-lot residential conversion in order to send a clear market signal.

**5. General Comments on the Location of Rural Reserves: Most Recent Data**

Metro staff recently provided a presentation to the MURR Steering Committee concerning recent changes in the Natural Resources Inventory to incorporate new data layers and improve the accuracy of data. The agencies recommend that the counties utilize these data in making their final proposals for rural reserves.

**C. General Comments on the Location of Rural Lands (Lands Not Designated as Urban or Rural Reserves)**

Retaining the existing planning and zoning for rural lands (and not applying a rural or an urban reserves designation) is appropriate for lands that are unlikely to be needed over the next forty years, or (conversely) that are not subject to a threat of urbanization. In addition, it is appropriate to assure that neighboring cities not within the Metro boundary each have some undesignated rural lands at their periphery in order to allow them to determine the location and extent of future urbanization.

**D. Specific Comments on Proposed Reserves, By Area**

**1. Clackanomah and East Multnomah County Areas**

The state agencies generally support the recommendations of Multnomah County for rural reserves in the East County area, except that they should generally be limited to areas within three miles of the existing UGB unless there is a specific threat of urbanization that they are responding to. The area around Barlow High School (south of Lustad Road to 302<sup>nd</sup>) could be included in an urban reserve or left with its existing rural zoning due to existing development patterns. Similarly, to align with Clackamas County, the area west of 287<sup>th</sup> (perhaps including land on both sides of that roadway) could be included in an urban reserve or left with its existing plan and zone designations.

In the Clackamas County portion of this area, the state agencies support the Metro Chief Operating Officer's (COO's) recommendation and the county's preliminary recommendations for both urban and rural reserves. This is one of the four areas in the region with lands closest to existing and planned transportation investments with superior access to labor force. At the Boring interchange on US 26 East ("Heidi's Corner"), an interchange area management plan (IAMP) will be needed to maintain separation between Sandy and the Metro UGB, and to ensure that urban development does not spill across US 26 to the east or south.

Finally, development in the East Buttes area (west of SE 272<sup>nd</sup> Ave) should be precluded or otherwise conditioned to protect the values of this natural feature.

## **2. Damascus**

The state agencies support both the county's and the COO's recommendations for this area. In particular, lands that are already within the City of Damascus should be included within urban reserves. However, the agencies also support leaving Noyer Creek and Deep Creek as rural reserves. It is important to note that OR 212 is forecast to fail to meet mobility standards even when widened to 5-lanes. Topography, infrastructure costs, and the presence of natural resources limit opportunities to add significant housing or employment capacity in this area.

For the area included within an urban reserve, there are a number of natural features that should be protected during urban development. Specifically, special consideration should be provided to protect the values and functions of Richardson Creek, Noyer Creek and Deep Creek where these features exist within the urban reserve.

## **3. Oregon City**

The state agencies generally support the COO recommendations (including Henrici Road). The bench lands located along the southern Oregon City UGB should be included as urban reserves. The Northeast Oregon City subarea (Forsythe/Holcomb) should be included *only* if needed to reach overall regional housing land targets or regional balance. It is important to note that OR 213 is forecast to fail to meet mobility standards even when widened to 5-lanes.

Urban development should be excluded from Newell Creek Canyon to protect this important natural feature.

## **4. Stafford Area**

The state agencies support the COO's recommendations for the Stafford area, specifically including the recommendation to increase the amount of urban reserves relative to the initial recommendation from Clackamas County (the agencies would tend to include even more lands than the COO appears to recommend). This is one of the four areas in the region with lands closest to existing and planned transportation investments, and with superior access to the regional labor force (if I-205 is widened, or HCT is extended along I-205). As a result, it is particularly well-suited for long-term employment purposes. A larger area is recommended for inclusion recognizing the significant transportation costs (widening I-205 to six lanes, interchange improvements) that would be required in the long term. North of I-205, carefully-designed conditions should be included to protect the areas within the Tualatin River floodplain (and significant associated drainages, e.g. Wilson Creek) for their natural resource and wildlife values.

The vicinity of the Stafford interchange on I-205 should be included within the UGB only if an interchange area management plan (IAMP) is developed. Any new Town Center



or Station Community designations consider the barrier effect of the freeway itself, and reduce reliance on the freeway and the freeway interchange for internal circulation and short trips. Concept Plan(s) should provide for internal multimodal circulation and connectivity within the concept plan area, within any proposed new mixed use centers, and to the existing Town Centers of Wilsonville, Tualatin, West Linn, and Lake Oswego.

## **5. East Wilsonville**

The state agencies support the recommendations of the Metro COO regarding urban reserves and rural reserves in this area.

## **6. South and West Wilsonville/South Sherwood**

### South Wilsonville

ODOT, ODA, DLCD, OWRD, DEQ, ODFW, and DSL support the preliminary recommendation from Clackamas County to designate lands south of the Willamette River (French Prairie) as a rural reserve. The reasons for a rural reserve designation include: threat of urbanization, high suitability for agriculture, very significant transportation limitations (Boone Bridge capacity and no alternate river crossing, poor multimodal connectivity), poor suitability for urbanization (services and distance to existing population), and concerns about encouraging urban development moving south along I-5 into prime agricultural lands.

Oregon Business Development Department supports leaving the portion of the French Prairie area along I-5 and Highway 99 undesignated, to provide more flexibility in the event that additional large employment sites are needed in the region over the long term.

### West Wilsonville/South Sherwood (Clackamas County)

The agencies support the COO recommendations for this area (both for urban and rural reserves).

### West Wilsonville/South Sherwood (Washington County)

The agencies support the COO recommendations for this area (urban reserves). There are significant transportation issues associated with this area over the long term (Highway 99W and Tualatin-Sherwood Road) that will limit its ability to provide significant employment opportunities until resolved.

## **7. West Sherwood**

Generally, the state agencies do not support including the areas due west of King City suggested as urban reserves in the COO and Washington County recommendations.

Generally the areas west of Sherwood suggested as urban reserve by the COO and Washington County should not be included, except for the southern portion of this area west of Highway 99 bisected by Kruger Road. Specifically, Tualatin River floodplain and riparian habitat north of SW Lambeau Road, west of SW Roy Rogers Road, and east of SW Elwert Road should be included in the adjacent rural reserve proposed north of the Tualatin River.

The areas described above should be “undesigned” rural lands.

Rural reserves more than three miles from the existing UGB should not be included unless there is some specific threat of urbanization. Lands along Highway 99, southwest of Sherwood, should be included in rural reserves.

#### **8. Bull Mountain**

The state agencies support the COO’s recommendations for this area. Rural reserves more than three miles from the existing UGB should not be included unless there is some specific threat of urbanization.

#### **9. Cooper Mountain**

The state agencies support the COO’s recommendations for this area. Due west of the Murray Hill Center, only the eastern portion of the proposed urban reserves area south of Weir Road should be included as an urban reserve. The remainder of the lands should be designated as rural reserves. Rural reserves more than three miles from the existing UGB should not be included unless there is some specific threat of urbanization.

#### **10. South Hillsboro**

ODOT, Oregon Business Development Department, DLCD, OWRD, DEQ, ODFW, and DSL agree with the recommendations of Washington County and the Metro COO for this area, although foundation agricultural lands in the southwestern portion should be included only in the event necessary to meet regional needs.

ODA supports designating the portion of this area located south of Butternut Creek as a Rural Reserve. As pointed out in the analysis provided in the ODA report to Metro, Butternut Creek and the adjacent golf course would provide a good edge and buffer between the urban area and a large area of foundation agricultural land. Urbanization beyond this “buffer” presents serious issues relating to the long-term integrity of the larger agricultural area located south of the current urban growth boundary (see *Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands*, Oregon Department of Agriculture, January 2007, page 48).

## **11. Cornelius/Forest Grove**

The state agencies generally concur with the COO recommendations for this area. Urban reserves should provide a (limited) long-term land supply for both the cities of Cornelius and Forest Grove. For Cornelius, there are lands to the south and southeast of the city that are outside of the 100-year floodplain that are appropriate for an urban reserve designation. In addition, the area between Hillsboro and Cornelius, north of Baseline/Tualatin Valley Hwy and east of Susbauer, should be included as well.

For Forest Grove, the area bounded by Thatcher, Purdin and Highway 47 should be studied further for possible designation as an urban reserve.

Intact forestlands in the Gales Creek Canyon area northwest of Forest Grove should be protected from urbanization through rural reserve designations where subject to the threat of urbanization (generally within three miles of the existing UGB). Lands within the Tualatin River (and associated streams) floodplain also should be used as a natural boundary, and designated as a rural reserves where there is threat of urbanization, along with lands to the north of Council Creek, and lands to the south of Forest Grove along Highway 47.

Rural reserves for areas here that are a significant distance from the existing UGB don't appear to meet the factors in the rule for designation of rural reserves (except along Highway 47), and generally there is too much land designated as rural reserves in this area.

## **12. North Hillsboro**

The state agencies agree that (with one exception) most of the area north of Highway 26 should not be designated as an urban reserve.<sup>4</sup> One exception is the area to the northwest of the Shute Road interchange (where additional transportation investments are anticipated). An Interchange Area Management Plan (IAMP) should be prepared during concept planning and adopted at the time this land is considered for inclusion in the UGB to ensure that surrounding land uses are preserved for the intended industrial use, based on the capacity of the interchange.

The area north of Highway 26 to the west of Helvetia and east of Jackson School roads should be designated rural reserves to form a "hard edge" to the boundary in this important agricultural region, except for area just east of the City of North Plains, which could remain "undesigned". In addition, the land south of Highway 26 in the vicinity of North Plains should be designated rural reserve (rather than current proposal as "undesigned") in order to steer urbanization for North Plains north of Highway 26.

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<sup>4</sup> Business Oregon supports a larger urban reserve designation in this area as needed to support long-term economic growth in key industries that are crucial to the state's economy.



The areas south of Highway 26 in the triangular shaped area bordered on the south by (approximately) Meek Road (and then by Waibel Creek further to the west) should be designated rural reserve to form a hard edge to that region, primarily due to significant agriculture lands and in part to reflect the fact that the Jackson School Road interchange and the road itself are designed to handle only rural levels of traffic.

The agencies agree that the area south of the triangle described above (i.e., north of Evergreen to Meek Road and then Waibel Creek extending McKay Creek to the west) should be urban reserve, as recommended by the County and the COO (and as identified in Hillsboro's concept plan), primarily to provide additional employment lands in this part of the region. However, the floodplain and riparian habitats associated with McKay Creek and Waibel Creek should receive protection during urban development.

### **13. Cornelius Pass**

The agencies concur with the Metro COO's recommendations for this area.

### **14. West Multnomah County**

The agencies agree with COO recommendations for this area. Agricultural and forest lands that are under threat of urbanization and that have high wildlife habitat value (including Sauvie Island and non-industrial forest lands linking Forest Park to larger blocks of wildland forest to the northwest as a wildlife migration corridor) should be designated as rural reserves. It is in the best interests of the state, Metro, the affected counties and urban residents to provide these landowners with economic incentives to continue investing in forest management rather than converting these lands to non-forest uses.

The corridor between the Multnomah Channel and Highway 30 is currently recommended as "undesignated." The rationale against rural reserve designation is, in part, the extent of wetlands and potential flooding that likely limits the footprint of development. The agencies are concerned that even with these development limitations, because of the proximity to Highway 30, there is a high long-term threat of urbanization. At the same time, the substantial aquatic habitat values and transportation access concerns suggest that this area be designated as a rural reserve.

Thank you for this opportunity to help Metro and the three Metro area counties determine how and where its residents will live and work during the next forty to fifty years. Our collective goal is to assure that the region's future is a sustainable one that best achieves livable communities, and that assures the viability and vitality of the agricultural and forest industries and protection of the important natural landscape features that define the region for its residents.

Sincerely,



Richard Whitman  
Director  
Oregon Department of Land  
Conservation and Development



Matt Garrett  
Director  
Oregon Department of Transportation



Katy Coba  
Director  
Oregon Department of Agriculture



Dick Pedersen  
Director  
Oregon Department of Environmental  
Quality



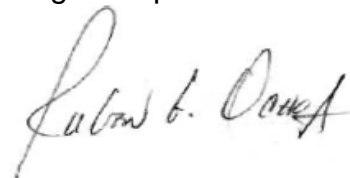
Tim McCabe  
Director  
Oregon Business Development  
Department



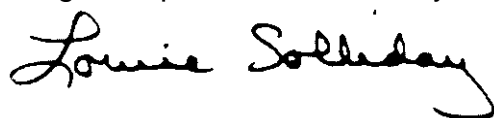
Roy Elicker  
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Marvin Brown  
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Ruben Ochoa  
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Oregon Water Resources Department



Louise Solliday  
Director  
Oregon Department of State Lands

Memorandum

To: Reserve Steering Committee  
From: 1000 Friends of Oregon, Land Use Representative to Reserves Steering Committee  
Date: October 14, 2009  
  
Re: Recommendations on Rural and Urban Reserves

1000 Friends of Oregon is a member of the Reserves Steering Committee, and participated in the crafting of Senate Bill 1011, which provided the opportunity for Metro and the counties to designate urban and rural reserves, and in developing the administrative rules implementing that legislation.

Therefore, our comments and recommendations are based on the legal and policy framework provide by those laws.

The legislature established the purpose of reserves (ORS 195.139):

- “(1) Long-range planning for population and employment growth by local governments can offer greater security for:
- (a) the agricultural and forest industries, by offering long-term protection of large blocks of land with the characteristics necessary to maintain their viability; and
  - (b) Commerce, other industries, other private landowners and providers of public services, by determining the more and less likely locations of future expansion of urban growth boundaries and urban development.”

The Reserves Rule, OAR 660-027-0005, expands on this purpose, and emphasizes the importance of balancing urban and rural reserves:

“Urban reserves ... are intended to facilitate long-term planning for urbanization in the Portland metropolitan area and to provide greater certainty to the agricultural and forest industries, to other industries and commerce, to private landowners and to the public and private service providers about the location of future expansions of the Metro Urban Growth Boundary. Rural reserves ... are intended to provide long-term protection for large blocks of agricultural land and forest land, and for important natural landscape features that limit urban development or define natural boundaries of urbanization. The objective of this division is a balance in the designation of urban and rural reserves that, in its entirety, best achieves livable communities, the viability and vitality of the agricultural and forest industries and protection of the important landscape features that define the region for its residents.”

The region has established a set of outcomes against which to measure the Reserves, as well as the other elements of “Making the Greatest Place.” Those are:



- Vibrant and walkable communities
- Economic prosperity
- Safe and reliable transportation choices
- Leadership on climate change
- Clean air and water
- Equitable distribution of benefits and burdens of growth.

Not only are these legal requirements, they also are good policy. The Metro Chief Operating Officer's (COO) *Strategies for a Sustainable and Prosperous Region* takes this framework and constructs a consistent, sensible, and forward-looking policy. We generally support the *Strategies* report, with some modifications in several specific areas. Building on these, 1000 Friends of Oregon makes the following policy and geographic recommendations for Rural and Urban Reserves.

### **Looking to the Future**

The Portland metropolitan area faces a future of climate change, population growth, globalization, and changing demographics. We can treat these challenges as opportunities for leadership and innovation, or we can dwell in the past, rest on our laurels, do things as we have always done them, and slowly wither away our quality of life and national reputation.

Climate change is accelerating at a faster rate than previously predicted. The state has set greenhouse gas reduction targets, and the US Congress is in the process of adopting requirements for greenhouse gas reductions from states and regions. Congress will be passing major legislation in the areas of climate change, transportation, and housing that will reward regions that are effectively working to reduce greenhouse gas emissions through changes to land use and transportation patterns.

As well as the Metro area is doing relative to other urban areas in the United States in reducing vehicle miles travelled, the RTP indicates that given our increasing population and current land use and transportation patterns, we will not reach the goal of reducing greenhouse gas emission from the transportation sector by *any* amount by 2035 if we stay our current course. This is unacceptable, both from a policy and legal perspective.

Our population is growing, aging, and becoming more diverse, and the preference for urban living with many cultural opportunities is growing – greatly outweighing the preference for suburban living. In the 2004 American Preference Survey conducted by the National Association of Realtors and Smart Growth America, well over 50% of those surveyed expressed a preference for neighborhoods with sidewalks, opportunities to shop and eat, a mix of income, ages, and ethnicities, and transit access.<sup>1</sup> In 2010, the number of those turning 65 accelerates dramatically, and they are living active lives quite a bit longer. This, plus smaller family sizes and having children later in life, contributes to the fact that by 2040, 72% of the households in this region will be without children, up from

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<sup>1</sup> Prof. Arthur C. Nelson, *Metropolitan Portland Mega Trend 2005-2040*, presentation to Metro Council October 8, 2008.

68% today.<sup>2</sup> Prior to increasing energy prices and the housing industry collapse, 51% of those surveyed expressed a preference, when they retire, to live in a city or suburb close to a city; only 19% preferred a traditional suburb away from a city.<sup>3</sup> The preference among all groups for various types of attached and small lot housing is also increasing, and is greater than the preference for large lot housing.<sup>4</sup>

Much of manufacturing is leaving the region and the United States due to various globalization factors. Instead, the Portland region is seeing growth in creative industries; research and development in software and hardware; and local business development – many of which have gained national and international stature – in food, wine, beer, and outdoor equipment and clothing. Some of these new businesses are focused on “green industries” of solar and wind manufacturing, “green” research and development, and sustainable industries of organic foods and wines.

The United States faces an infrastructure crisis that dwarfs that of other industrial nations, and that is just as true in this region. The repair and maintenance of our existing roads, bridges, sewer and stormwater systems exceeds the region’s collective infrastructure budgets and current financing tools.<sup>5</sup>

We recommend that in designating urban and rural reserves, the region should meet and embrace these changes, and truly lead the nation in addressing climate change, by focusing new jobs and housing in mixed-use centers and corridors; providing transportation choice; ensuring every neighborhood environment is walkable and bikeable with places people depend upon (grocery stores, schools, parks) not only within walking or biking distance, but in an environment that is safe and welcoming; using our existing infrastructure more efficiently by reusing and redeveloping land and buildings; and maintaining and enhancing the region’s agriculture industry.

In doing so, Metro has the opportunity to lead the nation in being truly green, not merely using “greenwash,” and to enhance the livability of an already great place.

## Urban Reserves

- ***Be Conservative in Time and Population***

We recommend that the designation of urban reserves be conservative in time frame and population projection. Our ability to predict future land and other needs is at best an art, not a science. Every urban growth boundary (UGB) delineated by Metro and every other

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<sup>2</sup> Prof. Arthur C. Nelson

<sup>3</sup> National Association of Realtors & Smart Growth America, American Preference Survey 2004, presented by Prof. Arthur C. Nelson, *Metropolitan Portland Mega Trends 2005-2040*, to Metro Council October 8, 2008.

<sup>4</sup> Prof. Arthur C. Nelson, *Planning for a New Era*, Journal of the American Planning Association, Fall 2006. Approximately 75% of those in a variety of surveys prefer attached housing or detached, small lot.

<sup>5</sup> As the COO’s report notes, the region needs approximately \$10 billion over the next few decades simply to repair and rebuild existing infrastructure. (p. 5)

city in Oregon since 1973 has proven to be larger than needed for the time frame predicted; that is, we have used less new land than anticipated.

The costs of erring on the too-large side are too great and irreversible. Once land is designated as available for urbanization, even if that might not happen for decades, farmers will no longer make long-term investments in crops, wells, irrigation systems, machinery, or other agricultural infrastructure. Land speculation begins: a significant amount of farming is on leased lands, and already during this reserves process, farmers have lost leases because the land owners are hoping their land will be in the urban reserve and they do not want the land to appear to be in farm use. The region has limited funds and financing tools for infrastructure, which should be carefully focused where growth is certain during the time frame, rather than spread in a scattershot fashion over an area that might never develop.

Therefore, we recommend using the year 2040 and the lower level of the “middle third” population and employment range the COO recommends.

- ***Be Conservative in Scale: Focus on Compact, Mixed-Use Centers & Corridors with Transportation Choice***

The urban reserves should be conservative in acreage; less than the acreage implied by the COO’s report. As described earlier, every demographic, environmental, and socioeconomic trend points towards future demand for more compact, mixed-use neighborhoods with housing and transportation choice, which translates into less need for new land. This has multiple benefits, including reducing greenhouse gas emissions and obesity. The transportation sector accounts for 34% of the state’s greenhouse gas emissions. Integrating land use and transportation to reduce the amount of vehicle miles traveled is perhaps the single most important action a region can take to make a permanent impact on climate change, reducing it by about 30%.<sup>6</sup>

The steps the region has already taken to link land use and transportation have borne fruit for every resident: commute times are shorter than other comparable metropolitan areas, saving approximately \$1.1 billion on transportation costs alone, not to mention the enhanced quality of life from spending more time at home and less on the road. In total, because Portland-Vancouver drivers drive 20% fewer miles a day, the region’s economy saves \$2.6 billion a year, or about 3 percent of the area’s annual economic output.<sup>7</sup> This is money that stays in the pockets of residents and is spent locally.

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<sup>6</sup> The “number of dwellings per acre is directly related to GHG emissions” and “higher residential and employment densities, mixed land-use, and jobs-housing balance are associated with shorter trips and lower automobile ownership and use.” (Brown, Marilyn A., Southworth, Frank, and Sarzynski, Andrea. *Shrinking the Carbon Footprint of Metropolitan America*. Metropolitan Policy Program at Brookings Institute May 2008. Also, Environmental Protection Agency, *Our Built and Natural Environments*; Federal Highway Administration, *Emissions Benefits of Land Use Planning Strategies*; European Environmental Agency, *Climate for a Transport Change*, 2008; Ewing, Reid, et al. *Growing Cooler: The Evidence on Urban Development and Climate Change*. Washington, D.C.: Urban Land Institute and Smart Growth America, 2007.

<sup>7</sup> Impresa, Inc., *Portland’s Green Dividend*, prepared for CEOs for Cities, 2007.



These changes in our built environment and transportation systems also make communities more affordable and healthy. Integrating land use and transportation reduces obesity. A Health Impact Assessment looking at the health impacts of 11 different methods to reduce driving in the metropolitan areas of Oregon found that creating affordable neighborhoods that are high-density, mixed-use, and highly connected not only reduces greenhouse gas emissions, but is also one of the most effective ways to make people more active, decrease air pollution, and reduce car crash fatalities.<sup>8</sup>

Metro leads the nation in evaluating what makes an affordable community - not simply a house - by combining both the transportation and housing costs of households to determine whether and where in the region households are disproportionately cost-burdened – that is, spending more than 50% of their household income on housing and transportation combined. Increasing housing choice and density and locating it in transit-served areas with a mix of uses reduces household costs by eliminating the need for a second car or a car at all, and increases health.

Focusing new residential and employment growth in mixed-use centers and corridors is also consistent with the “local aspirations” of cities throughout the region, as those are expressed in their existing comprehensive land use plans and zoning codes. As Metro’s Urban Growth Report (UGR) concludes, the region already has sufficient zoned capacity to meet at least the 20-year population and employment projections. Most of the region’s cities aspire to greatly improved transit service, including light rail. These transit improvements are extremely unlikely to happen without attaining the zoned densities in the appropriate locations. A large urban reserve is counter-productive to achieving these local aspirations, as it will draw densities down, and population and employment to more far-flung areas that are harder to serve with transit. Meeting the local aspirations of the region’s cities leads to a more conservative urban reserve.

Finally, designating urban reserves that are smaller in acreage than, or at the low end of, the range implied by the COO is also consistent with state law. The COO’s report appears to assume that the residential and employment capacity of the 2009 Urban Growth Report stays static for the Reserves time period. And, it also assumes that the zoning and planning already adopted in comprehensive plans will not be met during the 20-year UGB period due to a gap of investment and policy. We believe these assumptions are not based in law or sound policy.

Metro’s Region 2040 Growth Concept, Making the Greatest Place, and the COO report are all based to a significant degree on concentrating development in centers and corridors. We support that, and both the UGR and urban reserves recommendation should reflect that in the future, even more population and employment growth will be going into corridors than assumed in either document for their respective time periods.

The July 2004 ECONorthwest Report on Corridors, prepared for Metro, reviewed the planning and zoning for nine corridors and concluded: “Corridors tend to be lower-

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<sup>8</sup> *Health Impact Assessment on Policies Reducing Vehicle Miles Traveled in Oregon Metropolitan Areas*; Upstream Public Health, Oregon Health & Science University, Human Impact Partners, May 2009.

density and more auto-oriented.”<sup>9</sup> The Report shows the region currently has 41,907 gross acres of “Corridors,” of which 13,296 acres are zoned for single family and more than 5,400 acres are zoned either “rural,” “agriculture,” or “forest.”<sup>10</sup> To meet the Region 2040 requirements and market demands over the 20-year UGB period and the Reserves period, these corridors will be re-zoned to higher density and mixed uses. If the UGR relies on this current zoning in assessing the UGB capacity, then the COO’s report has underestimated the UGB’s capacity for both UGB and reserves purposes.

In addition, assuming that existing planning and zoning will not be met over the planning period may not meet the requirements of ORS 197.296 and Goal 14. But even if it were a likely scenario – that adopted zoning cannot be met without changes in investments and policies inside the UGB - the COO assumption only tells half the story. **What is the alternative?** It will be even more expensive and politically challenging to accommodate that same population and employment growth on land *outside* the existing UGB – where there is no city governance; no urban zoning; nothing resembling an urban renewal district or other infrastructure financing method; and rural roads, septic systems, and wells or rural service providers.

These planning efforts are not about extending a road or pipe here or there for a few houses or a subdivision; these are for 20-50 years, and that scale of development outside the UGB will involve entirely new road systems, interchanges, transit lines, extensive sewer and stormwater lines, upgrades to and new sewage plants and water facilities, etc... Inside the UGB already has the zoning capacity, much of the governance, and some of the financing methods in place, and much of the infrastructure though it will need repairs and upgrading as well – just not nearly as much as outside.<sup>11</sup>

The COO’s report may well underestimate the current UGB capacity for both the 20-year UGB period and the reserves period. Therefore, the urban reserve acreage should be on the small side of the COO’s report.

In general, we support the recommendations for urban reserves made by Multnomah and Clackamas counties. While we recommend some modifications, the two counties have kept true to the policy and legal direction to accommodate most population and employment growth inside the existing UGB, focusing on centers and corridors and existing infrastructure. This is consistent with local aspirations as reflected in the adopted comprehensive plans and zoning codes of their cities. They have shown that it is possible to meet the challenges and opportunities of the future with new investment and policy tools, and that simply adding more land is not the answer for the 21<sup>st</sup> century.

- ***Reuse and Invest in the Land & Infrastructure We Have***

As the COO report states, Metro should focus on using its existing land supply and infrastructure more efficiently, rather than greatly expand the urban area on to new lands. Concentrating growth inside the UGB means there is less need for urban reserve areas. It

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<sup>9</sup> ECONorthwest July 2004, p. 2-4

<sup>10</sup> Id. at p. 5-3, Table 5-1.

<sup>11</sup> Metro, *Regional Infrastructure Report*, July 2008

is more cost effective and conservative to focus investment on those areas where urban growth is more likely to occur, rather than spreading it thinly over a broad area.

Metro's infrastructure report concluded that it is 2 to 3 times more expensive to accommodate the same amount of housing and jobs on new land than on existing land, due to the increased infrastructure costs for new land.<sup>12</sup>

Over the next 30+ years, the region, and the nation, has an opportunity to use the existing urban land supply and infrastructure more efficiently while building better neighborhoods near where people already live and work. At a Metro-sponsored conference, Prof. Arthur C. Nelson explained that most retail and warehouse buildings are built to last for only 15-25 years; other non-residential buildings also have lifespans less than 50 years. Half the nation's non-residential buildings that existed in 2000 are expected to be torn down by 2030; this is true in this region.<sup>13</sup> This presents an opportunity to accommodate much of the region's population and job growth in existing urban areas on existing infrastructure, and to re-build in ways that enhance community – by recycling oversized parking lots, retrofitting with mixed uses, removing impervious surfaces to create community gardens, clustering development around bus lines, etc...

Using the existing infrastructure also keeps homes more affordable. The high cost of providing infrastructure to housing developments on new land means that it is either paid for or passed onto the homebuyer, making the new home unaffordable to most, or the cost is spread throughout the region via increased rates or other financing mechanisms, thereby making it more expensive to stay in one's own home.

- ***Economic Development: Be Truly Green***

The Portland region cannot rest on its laurels of being green; plenty of other regions in the United States and around the world are aggressively and successfully competing for the title of "greenest" because, among other things, it is a successful economic development strategy.

But it requires being truly green, not merely applying greenwash. The region, and state, courts solar and wind related manufacturing, but if it is located in a one-story building occupying a large plot of land, disconnected from surrounding communities and inaccessible by transit, then it is just another sprawling manufacturing plant. A sustainable economy requires us to walk our talk, and locate jobs near where people already live and where existing and planned transit makes those jobs accessible. The region should focus on reusing existing buildings, assembling adjacent vacant and underused industrial parcels, cleaning up brownfields, and protecting significant industrial areas from conversion to other uses.

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<sup>12</sup> Id.

<sup>13</sup> Prof. Arthur C. Nelson, *Metropolitan Portland Mega Trend 2005-2040*, presentation to Metro Council October 8, 2008.

Currently, there are over 10,000 acres of *vacant* employment land inside the UGB, and thousands more acres of underused sites.<sup>14</sup> And, there appears to be more than a sufficient number of large lot sites inside the UGB, once adjacent tax lots are accounted for. It is also not clear if Metro has accounted for empty buildings that can be re-used by industry. The region has seen several recent examples of new high tech companies locating in the vacated buildings of other high tech companies. Not only must Metro count all of this towards meeting its employment projections, it should. Focusing future investments and policies in these areas brings jobs to where people already live and, in some cases, to places that once held jobs. It also builds upon existing infrastructure.

Importantly, this means investing in and providing for employment land on the east side of the region, both inside the UGB and in urban reserves, where people currently live and need additional employment opportunities. The Portland region is small, geographically speaking, compared to other regions with which we compete. High tech facilities already exist throughout the metro region, including in Clark County. In no other urban area is a high tech “cluster” limited to an area as small as western Washington County.

There has been much focus on the “need” for large lots. We appreciate the need to separate out the specialized category of land demand for large lots for marine/air/rail terminal facilities. These sites need to be protected for that use and, where necessary, private and public investments should be made to aggregate parcels, clean up brownfields, improve access, etc... However, this need is location-specific; these sites must be near or well-connected to the river/airport/rail. Therefore, they are not a fungible acreage that can be used as a need to designate urban reserves, unless it is to include a site(s) that already has that river/rail/airport locational characteristic.

The attention to large lots, other than that noted above, should not be over-emphasized or the region’s future employment and industrial growth needs will be missed, along with job growth. Most new jobs are created by existing businesses, and most of those businesses start small, in the existing urbanized area, and expand slowly. Job growth does not come primarily, or even much at all, from attracting large employers not already located here. Metro’s *Large Lot/Employer Report* recognizes this. Nike, Precision Castparts, and Tektronix are just a few examples of larger companies that started here small and grew.

Finally, the Portland region has a national reputation for a high and unique quality of life that draws young, educated people, entrepreneurs, and small businesses. That quality of life is based on a sense of place – the working landscape and natural features, that you can be at the mountains or the beach in less than two hours, that you can ski and surf in the same day, and on the variety of small, creative businesses that take root here. It is also based on larger businesses concentrating on outdoor apparel and equipment, high tech research and development, and the health care industry. And, it is based on the agricultural industry, including food processing, value-added farm products, agri- and eco-tourism, local wines and beer, restaurants, and more - businesses that tend to re-use existing buildings.<sup>15</sup> The region should look to the future and take advantage of its

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<sup>14</sup> Metro COO, *Strategies for a Sustainable and Prosperous Region*, Sept. 2009, p. 7.

<sup>15</sup> Joe Cortright: [http://www.portlandtribune.com/news/story.php?story\\_id=124587742324069000](http://www.portlandtribune.com/news/story.php?story_id=124587742324069000)



unique attributes, rather than looking at what happened in the past or trying to attract the same businesses that every other region is vying for.

These opportunities to accommodate more employment inside the UGB, based on the unique attributes of the Portland region, translates to less land need for urban reserves. And the challenge to be truly green leads the region to the same place.

## **Rural Reserves**

1000 Friends of Oregon agrees with much of the COO's report on the location of rural reserves, with some additions, taken from areas under consideration for urban reserves.

Some participants in the reserves process view farm land as "vacant" land awaiting urbanization when, in fact, that land is the base for one of the region's and state's top industries. Agriculture is Oregon's #2 industry, and the Portland region forms its core. Farming is a \$5 billion industry in Oregon. Clackamas and Washington counties are in the top 5 agriculture-producing counties in the state. Food processing, in which Multnomah County leads, was the *only manufacturing sector* in Oregon to show positive employment gain in 2008.

Add in the goods and services farmers purchase from other businesses to grow food and fiber, and the value-added products that are produced, and agriculture is a \$10 billion industry, accounting for over 10% of the state's economy. And much of that is exported, bringing new dollars into the state, and into the region's economy. Agricultural products are # 1 in bulk and #2 in value of shipments out of the Port of Portland. This represents a significant statewide and regional economic engine

Oregon agriculture has been increasing in value every year for over a decade, a claim that no other industry can make. Due to the region's excellent soils, climate, and rainfall, local farms can adapt quickly to changing global economies and weather patterns by changing crops. Crops grown regionally include hazelnuts, nursery products, clover seed, blueberries, vegetables, wheat, grass seed, Christmas trees, wine grapes, and more.

Moreover, no other industry is soil dependent. High tech companies, shopping malls, office buildings, and houses can re-use already developed land and buildings. In contrast, farming is dependent upon an ever-decreasing amount of an irreplaceable resource.

In the Metro area, farming is integral to both sides of the urban growth boundary. Many businesses inside every city are wholly or partly reliant on the agricultural industry, including equipment dealers, processors, insurance companies, banks, etc.... In addition, the working landscape forms the backdrop to where we live, and local agriculture makes possible the dozens of farmers markets that are neighborhood meeting places, providing reliable and healthy local food. Local agriculture also supports the region's growing and nationally-recognized food niche, which include restaurants, wine, beer, value-added products, and more.

It is critical that the region's rural reserves are designated consistently with the rural reserve factors in state law and, in particular, based on the capability of sustaining long-term agricultural operations, taking into account the existence of large blocks of agricultural land; protecting lands subject to urbanization; and recognizing the importance of agricultural infrastructure.

In addition to the rural reserve factors and purpose of the reserves statute and rule, our recommendations are guided by some additional principles:

- Where land meets the rural reserve factors on both agricultural land *and* natural resource grounds, it should be protected as a rural reserve.
- In most cases, rural reserves should abut urban reserves; there should not be undesignated lands between them. These will simply become urban lands-in-waiting. Only lands that do not meet either the rural or urban reserve factors should be left as “undesignated,” and then labeled by their underlying zoning, not by the term “undesignated.”

### **Specific Area Recommendations**

We have not attempted to comment on every area, but may do so in the future as well as make more detailed comments on the areas we do address below. We have used the Core 4's number/letter system in their October 12 memo entitled “List of Proposed Preliminary Areas of Agreement and Areas for Further Discussion,” and proceed from the west to the east of the region. Our recommendations are generally reflective of the COO's report and its proposals for potential reserve areas. Because the COO report intentionally did not provide specific maps – which we support because it provides more flexibility in the discussions at his stage – our recommendations also sometimes delineate a clear boundary and sometimes are more general.

#### **UR-B Bethany**

We recommend a smaller area as urban reserve, by using NW 185<sup>th</sup> as the western boundary, rather than straddling it. The road is a manmade and logical buffer between the urbanized area and the large block of agricultural lands to the west (Helvetia). If the urban reserve crossed 185<sup>th</sup>, there is no other logical boundary for quite a distance.

#### **UR-2 Helvetia (north of Hillsboro and Hwy 26)**

We agree with the COO's report to designate this entire area as a rural reserve. The area meets every rural reserve criteria under OAR 660-027-0060, as described in detail by much testimony from the Save Helvetia group. It is entirely Foundation agricultural land, is clearly subject to urbanization during the time period, is capable of and does sustain long-term agricultural operations, is primarily Class I and II soils, is an intact large block of farm land with a cluster of interdependent farm operators and businesses, Highway 26 and Helvetia Road provide excellent manmade buffers and edges that protect the area from conflicting uses, and the farm use and ownership patterns demonstrate long-term stability. Testimony has also shown that it has significant natural resource features,

including elk herds, and is part of the habitat connectivity from Forest Park through to the Coast Range.

### **UR-C North Hillsboro**

Consideration should be given for an urban reserve in this area, but smaller than that described in the COO report. The western boundary of a potential urban reserve should be Sewell Road, with the rural residential exception area located there acting as a buffer between urbanization and farming. This boundary would extend south to Evergreen Rd.. The land should be reserved for large lot industrial use, and all transportation should be oriented towards Shute Road, *not* Jackson School Road. Although this land is Foundation land and meets every rural reserve factor, we recognize the need to balance that with urban reserve needs – to this extent.

The land to the west of Sewell Road should be designated as a rural reserve. This is entirely Foundation agricultural land and meets every rural reserve factor. It is subject to urbanization during the time period, is capable of and does sustain long-term agricultural operations, is primarily Class I, II, and III soils, is an intact large block of farm land, Sewell Road and the exception area are an excellent manmade buffer and edge that can protect the area from conflicting uses, and the farm use and ownership patterns demonstrate long-term stability.

We strongly object to the COO proposal to extend this potential urban reserve as far west as McKay Creek and north to Highway 26. This will take an enormous area out of farm land production that is part of the core agricultural lands and industry in Washington County and the region. The proposed area's proximity to Jackson School Road will be a magnet for future urbanization in this western direction, adversely impacting the farm lands around this area with conflicting uses, speculative land purchases, urban traffic, and more. The current and future transportation system in this area is auto-dependent, which will exacerbate the region's greenhouse gas emissions, and our ability to reduce them, which is already in doubt.

It is questionable that this amount of land is needed for urban uses, including employment, given the amount of vacant and underutilized acres and buildings inside the existing UGB, including in this part of Washington County.

### **Undesignated Areas around North Plains and Banks**

Mapping large areas of “undesignated lands” around North Plains and Banks is a mis-use of this term, by creating a category of “next-in-line” lands for urbanization that is not contemplated by the law. Much of these areas clearly qualify for rural reserve designation – they are part of large blocks of Foundation land in active, long-term, stable agricultural production and consist of Class I, II, and III soils. The only real question is whether all of them are subject to urbanization in the time period, but their appearance as “undesignated” on the Washington County proposed reserves map adds to the argument that they are.

The footprint size of these undesignated lands is many times the size of the existing cities of North Plains and Banks. It is extremely unlikely that these cities would experience that much growth and would accommodate it in a *less* dense pattern than already exists, which would also be contrary to law.

We recommend that the Core 4 consider rural reserve designation for some of these areas.

### **UR-3 North of Council Creek**

We support the COO report to not designate urban reserves north of Council Creek in the Forest Grove/Cornelius area. This area should be designated rural reserve. It is Foundation agricultural land and meets all rural reserve factors. It is subject to urbanization during the time period, is capable of and does sustain long-term agricultural operations, is primarily Class I, II, and III soils is an intact large block of farm land, and the farm use and ownership patterns demonstrate long-term stability.

In addition, Council Creek and its floodplain form a natural boundary separating urban and rural uses, and qualify as an important natural landscape feature. Crossing Council Creek would be a significant intrusion into the heart of Tualatin Valley agricultural land and industry, without any other logical, natural boundary evident. Because the area qualifies under both the agricultural land and natural resource categories as a rural reserve, it should be designated.

An urban reserve designation here is also contrary to the local aspirations of Forest Grove and Cornelius, as reflected in their local plans and on-the-ground circumstances. Both want significant transit improvement, including eventually light rail. This will not be possible without increases in density and proper design and location along the transit corridor. Cornelius, in particular, has hundreds of acres of vacant land and more that is underutilized. Large parcels inside the existing UGB are still being farmed including land added to the Cornelius portion of the UGB for industrial purposes about 4 years ago.

Expansion across Council Creek is contrary to the urban reserve factors. It would not facilitate compact, mixed-use development in the current town centers of either city, and would be contrary to creating a community that is well-served by transit. Instead, it would reinforce auto-oriented development patterns and would be contrary to the state and region's climate change goals.

We recommend that the Core 4 examine the David Hill Road area, to the northwest of Forest Grove, for possible urban reserve designation. It is identified by the Oregon Department of Agriculture as conflicted farm land and already has some higher-end nonfarm dwellings on it.

### **UR-E & F Southwest and Southeast of Cornelius**

We do not support the COO suggestion to designate urban reserves south of Cornelius. This area is in active and long-time farming, and it includes a large floodplain of the Tualatin River, which forms an important natural landscape feature. The floodplain is



extensive and makes urbanization of it very problematic. Urbanizing a floodplain is contrary to the current efforts of state and local governments to mitigate the impacts of climate change by *not* developing in such areas. The area should be designated as rural reserve, because it meets the rural reserve factors for both farm land and as an important natural landscape feature.

We recommend, instead, that the Core 4 consider urban reserves north of the TV Highway adjacent to and to the east of Cornelius, towards Hillsboro. This area contains exception areas and a golf course, and some EFU land. Existing sewer and water lines all lie north of the TV Highway, not south. This would connect the transit corridor between Hillsboro and Cornelius/Forest Grove, and allow additional residential and/or employment density along it to support future improved transit service.

The overall acres proposed by Washington County for urban reserves in the Cornelius/Forest Grove area would more than double the current size of these cities. This is not supported by law or population and demographic projections. It is also contrary to the region's and state's climate change goals.

#### **UR-G South of Hillsboro**

The southern boundary of the urban reserves in this area should be Butternut Creek. That and the golf course encircle the "Conflicted" farmlands and provide an excellent edge to urban development and buffer to the Foundation lands to the south. The land south of Butternut Creek and to the west is entirely Foundation land and should be designated as a rural reserve. The area has extensive working farms and nurseries, and encompasses several important natural landscape features (Butternut Creek, Tualatin River, and its tributaries). Current and planned future transportation in this area is auto-dependent, and urbanization would cause extensive conflicts with agricultural operations.

#### **UR-H Cooper Mountain East**

We recommend that the western boundary of this urban reserve be at 175<sup>th</sup>/Roy Rogers.

#### **UR- 5 & 6 Farmington Area and West Cooper Mountain**

We support the COO proposal to not designate these areas for urban reserves. Instead, they should be considered for rural reserves.

#### **UR-7 West Sherwood**

To protect the active and large block of farming in northern portion of this area, we recommend that the northern boundary of the urban reserve be Edy Road. South of Edy Road the land is more parcelized, hilly, and has more non-farm dwellings.

#### **UR-S Borland Road Area and UR- 10 & 11 Stafford North and East**

We support the COO's and Clackamas County's recommendation of an urban reserve around Borland Road. We also support the County's recommendation of rural reserves

south of Schaeffer Road in the Pete's Mountain area. Much of the remainder of the Stafford Basin does not qualify for rural reserves.

### **UR-W Central Oregon City**

We support designating the area as an urban reserve, and recommend a condition of protecting Newell Canyon.

### **UR-Z and UR 13 Boring Area**

To preserve the agricultural integrity of the area, including nurseries, we recommend not designating the "triangle" of UR-13 as urban reserves, and consider drawing the eastern boundary of the urban reserve in UR-Z at 282<sup>nd</sup> Avenue.

### **UR-14 Troutdale**

We support urban reserves related to industrial development in the general area of east Multnomah County, but recommend more analysis to determine which lands best meet this need taking into account proximity of transportation systems, current residents, and employment centers, including the Fed Ex site. We are not convinced that this site meets these criteria, and it is also Foundation farm land.

### **South of Willamette River**

We support designating the area south of the Willamette River, south of Wilsonville as rural reserves. This area qualifies under every rural reserve factor for both farm land and as an important natural landscape feature. The Willamette River provides a large, natural buffer and edge to the metro area's urbanization. The area does not qualify as an urban reserve. The cost of providing infrastructure to it, especially transportation, is prohibitive. It would reinforce and extend an auto-oriented development pattern.



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Environmental Sciences and  
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**Lynn Youngbar**, Organizational  
Development Consultant

October 16, 2009

To: Metro Reserves Steering Committee and Core 4

From: Mike Houck

Re: Urban Greenspaces Institute Input on Reserves and Making  
Greatest Places Recommendations

Our comments are in response to both the *Making the Greatest Place, strategies for a sustainable and prosperous region* and on the Reserves Process on behalf of the Urban Greenspaces Institute, the Coalition for a Livable Future's natural resource working group, and as a member of the Reserves Steering Committee. A more completed set of comments on the COO report were submitted in a separate letter on October 15<sup>th</sup>.

We are supportive of the COO's report as it relates to:

- 1). Focusing future growth in centers and within the existing Urban Growth Boundary;
- 2). Focusing on maintaining existing assets;
- 3). Increasing options for travel;
- 4). Addressing Climate Change; and
- 5). Guiding Principles.

However, we feel strongly that two concepts need to be integrated throughout the COO report and that should guide the Reserves designations. They are **Green Infrastructure** and **Climate Change**, both of which are interrelated. Investing in green solutions to water quality, flood reduction, and responding to Climate Change through **adaptation** will produce multiple benefits for every dollar of private and public money spent. These concepts are relevant to the Reserves process both with regard to how Urban Reserves are eventually developed and the concept planning that should precede urbanization.

The COO report states, "*Energy instability and climate change require us to rethink everything—from where we live to where we get our food to how we get around.*" We agree. The region needs to move beyond mere mitigation of carbon emissions and incorporate **Adaptation** into

regional growth management strategies, including addressing the potential for increased flooding, urban/wildland interface wild fires, landslides and increased stormwater runoff in our residential neighborhoods. Better protection of natural resources inside the UGB, avoidance of UGB expansions onto floodplains, stream corridors and steep slopes, and better use of the region's green infrastructure must be incorporated into the region's response to Climate Change.

A key principle of the COO's report is to "Protect our urban growth boundary." Again, we agree. But we need to simultaneously protect, restore and better manage our green infrastructure, including natural resources, urban forest canopy, and access to nature within the existing UGB and Urban Reserves. Likewise, we strongly support using land inside the UGB more efficiently, but only if we simultaneously protect water quality, fish and wildlife habitat and ecosystem health inside the boundary while we limit unnecessary expansion into farmland, forest land and onto floodplains and natural ecosystems. Using developable land inside the UGB more "efficiently" must not be at the expense of ecosystem and watershed health.

We strongly support the COO's recommendations that we provide more protection for farmland. However, we feel that a complementary commitment to protect natural resources, in both Rural and Urban Reserves, is necessary. Designation of Urban Reserves should minimize loss of the region's most significant landscape features, floodplains, wetlands and fish and wildlife habitat. When designating urban reserves, we should leave space---including rural reserves when appropriate---between them and our neighbor cities so those cities can retain their identities and achieve their own aspirations, while protecting the entire region's sense of place through retention of significant landscape features.

We agree with the COO's report that the Core Four should make good on this commitment to working farm and forest families by pursuing additional actions to keep the farms and woodlots in the reserves available for food and fiber production. But, However, it's just as important that they make good on the promise to the region's residents that we will maintain a high quality of life in both the urban and rural landscapes by providing ready access to nature nearby and protection water quality and ecological values that all the region's residents have repeatedly told us they expect to be delivered by this planning effort.

**Extent of Rural Reserves:** Responding to comments from state agencies and Clackamas County's preference for fewer, smaller Rural Reserves, our position is that the purpose Rural Reserve designation is not solely to respond to threat of urbanization, while that is clearly of paramount importance.

We have understood the function of Rural Reserves to assure urban expansion does not occur in those landscapes that contribute to the region's sense of place, that are ecologically important, and that are important working landscapes. While we concur that designating an area that possesses these qualities does not "protect" that area, per



se, we do feel it is important for the region to acknowledge, through Rural Reserve designation those landscapes that perform one or more of the functions listed.

We also concur with 1000 Friends of Oregon's recommendation that areas that have any one of high value farm, forest or ecological values be considered for Rural Reserves status. Of course those areas that possess a mosaic of these features are even more appropriate for Rural Reserve consideration. We have noted those areas in our UR discussion and map annotations.

**Site Specific Comments:** What follows are comments specific to the sites discussed at the October 14<sup>th</sup> Reserves Committee Meeting. I have included maps of the Urban and Rural Reserve areas that were discussed that are keyed to the following comments. I have numbered my comments to coincide with the numbers on each page of maps. One caveat regarding our comments: Our recommendations are based on documented natural resource values (floodplains, habitats of concern, stream corridors and wetlands, Oregon Department of Fish and Wildlife Conservation Priority Areas, The Nature Conservancy Priority Areas and other layers in the Regional Natural Landscape Inventory), the one exception being where there is a mosaic of natural resource and foundation agricultural lands. Areas in blue on the attached maps are Natural Landscape Features. There may be other factors, such as serviceability or governance that would disqualify an area as an Urban Reserve, which we did not take into consideration in our analysis.

RR = Rural Reserve

- Map 1:        URAA: Yes to northern area, South section should be RR  
                 UR 13: Yes UR, but stream protection  
                 UR Z: Buttes to west should all be RR, not UR; UR to east okay, but with Stream protection
- Map 2:        URY: Yes UR, but with significant upland forest and stream protection  
                 Undesignated area south of URY should be RR with area north of Clackamas River RR.
- Map 3:        URT, yes UR  
                 UR U, yes UR  
                 UR W, yes UR, but protection of Newell Creek and steep slopes Adjacent to Newell Creek  
                 UR 12, should be undesignated  
                 UR X, should be RR, as well as all areas west of URX in RR
- Map 4:        UR R, No, should be RR  
                 URS, okay as UR from natural resource perspective  
                 UR 10, Major concern is impact on adjacent Wilson Creek  
                 UR 11, Major concern is impact on adjacent Wilson Creek

- Map 5: UR O, okay UR  
UR P, okay UR  
UR Q, No UR designation, but if designated UR protect significant Forest stand
- Map 6: UR N, left portion okay as UR, but stream corridor to east protect  
UR M, okay as UR with stream protection  
UR L, no should be RR and area between UR M and UR L should All be RR  
UR 9, okay as UR, although steep slopes are constraint  
UR K, okay as UR but enhanced stream protection  
UR 7, southern portion okay as UR, but Chicken Creek north Should be in RR designation (see map 7)
- Map 7: UR 7, south of Chicken Creek and floodplain okay as UR, everything From southern floodplain of Chicken Creek north should be RR  
  
UR 8, western portion okay as UR, eastern portion RR
- Map 8: UR J, should all be RR, adjacent to Tualatin River National Wildlife Refuge and slopes of Bull Mountain  
UR I, only portion cross hatched on map should be UR, rest should be Designated RR
- Map 9: UR H, RR  
UR 6, RR  
UR 5, RR based on Agricultural/Natural Resource Mosaic
- Map 10: UR G, West and southern portion as indicated on map should be RR  
NW corner, UR
- Map 11: UR D, okay for UR  
UR E, should be designated RR based on both agricultural and floodplain Area was inundated in flood of 1996 and likely to expand over time as Floodplain; unsuitable for residential development.  
UR F, southern portion should be RR, northern portion okay for UR, with stream protection and restoration.  
UR 3, Agricultural and Natural Mosaic, should be RR
- Map 12: UR C, Okay as UR but we agree with 1000 Friends observation that The area should be smaller in size. Furthermore, the boundary adjacent to be pulled back considerably to the east of McKay Creek (as noted by arrows on map) and north of floodplain and tributary stream to McKay Creek.  
  
UR 2, RR based on agricultural and natural resource mosaic

- Map 13: UR 1, All of UR 1 west of cross hatched area should be RR  
UR A, both are okay for UR, but they seem to be highly constrained  
By slopes and streams.
- Map 14: UR 2, Should be RR owing to mosaic of agricultural and natural resource  
Lands  
UR B, Small area in SE corner okay for UR, but rest to the west should  
Also be RR due to Rock Creek corridor.
- Map 15: UR 14, Troutdale. We are not aware of the exact boundaries of this UR  
Area, but have significant concerns if it is adjacent to the proposed RR  
Area associated with the Sandy River. We strongly support this RR  
Designation. There appear to be significant stream corridors associated  
With UR 14 which either should disqualify it as an UR or would  
Significant stream protection if it were designated an UR.

Respectfully,

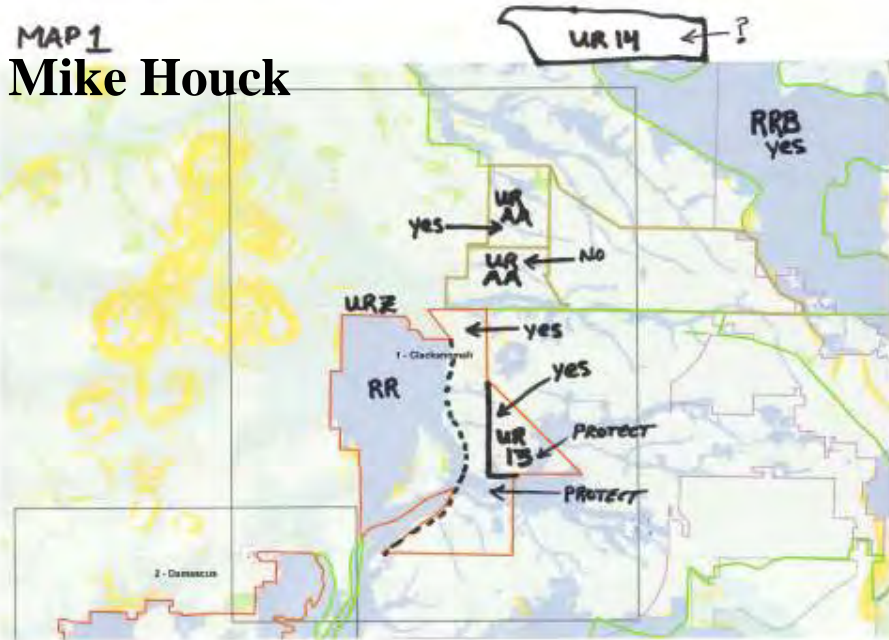
Mike Houck,  
Executive Director

*Comments on Urban and Rural Reserves*  
*October 15, 2009*

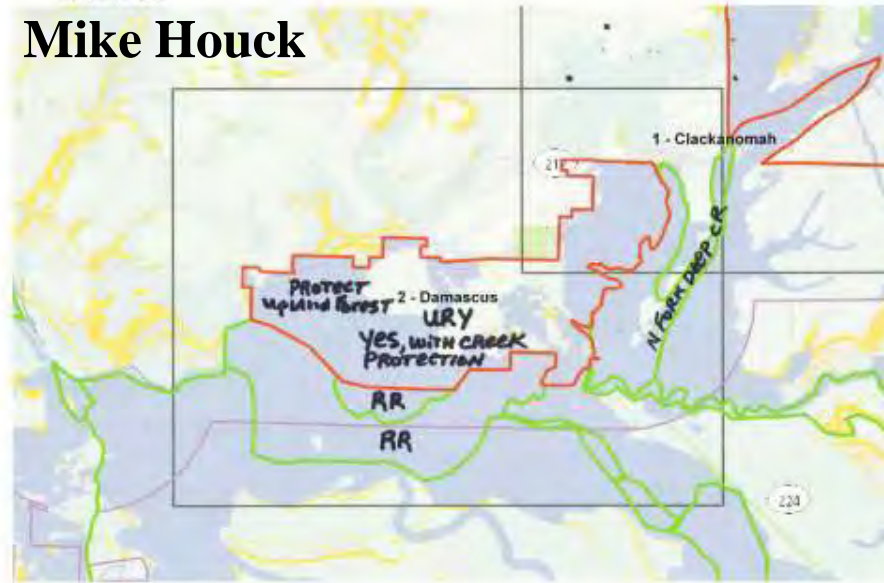
Mike Houck, Director  
Urban Greenspaces Institute  
[www.urbangreenspaces.org](http://www.urbangreenspaces.org)



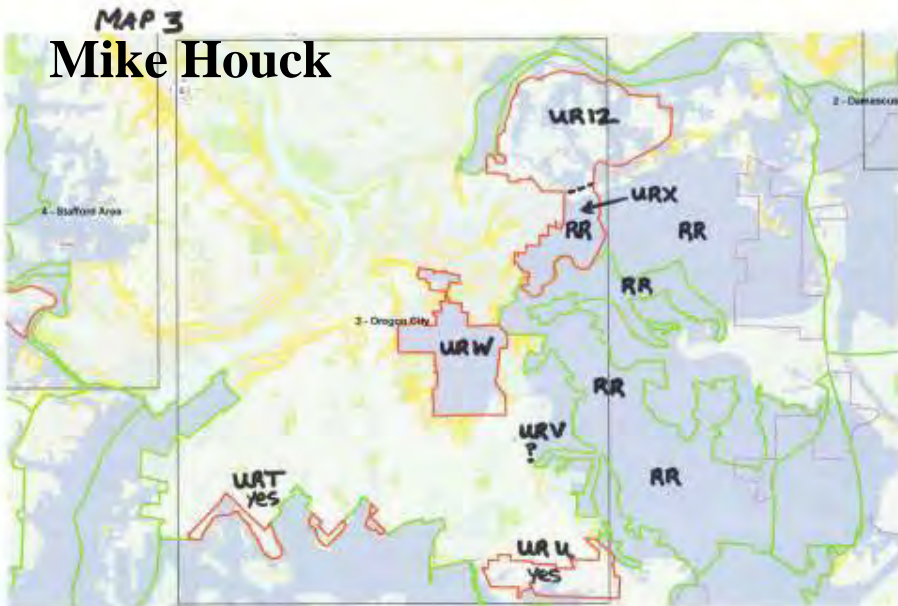
MAP 1  
Mike Houck



MAP 2  
Mike Houck



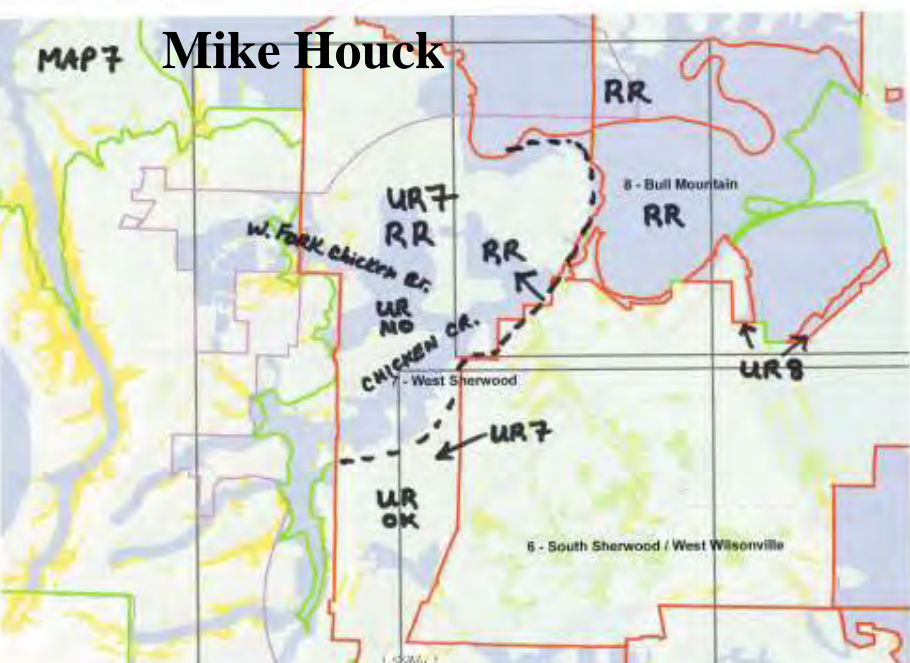
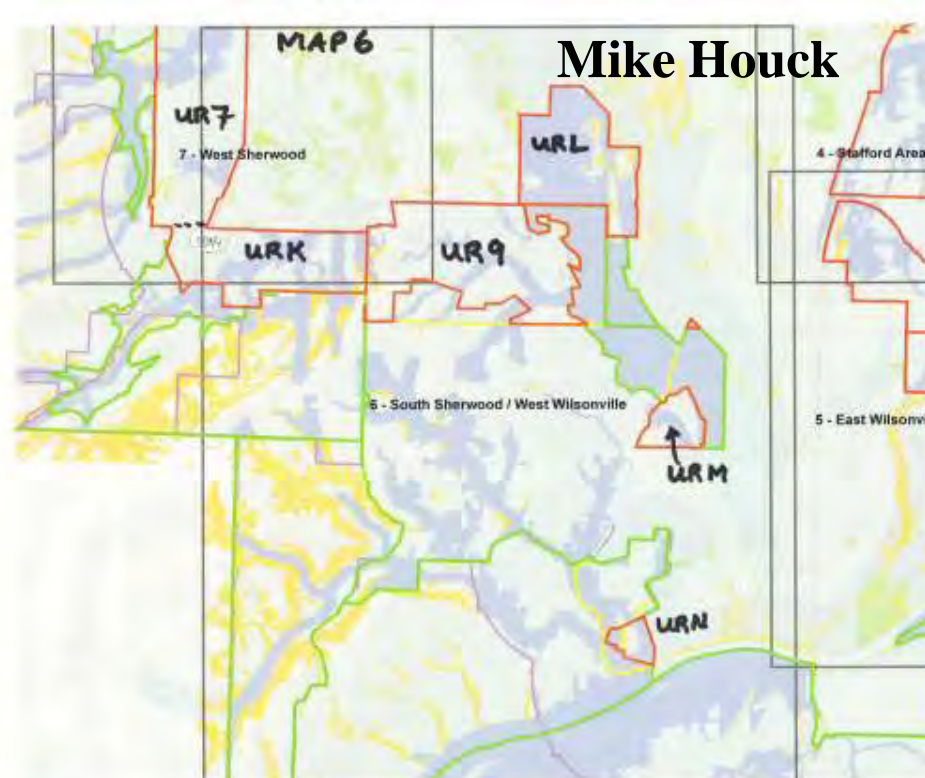
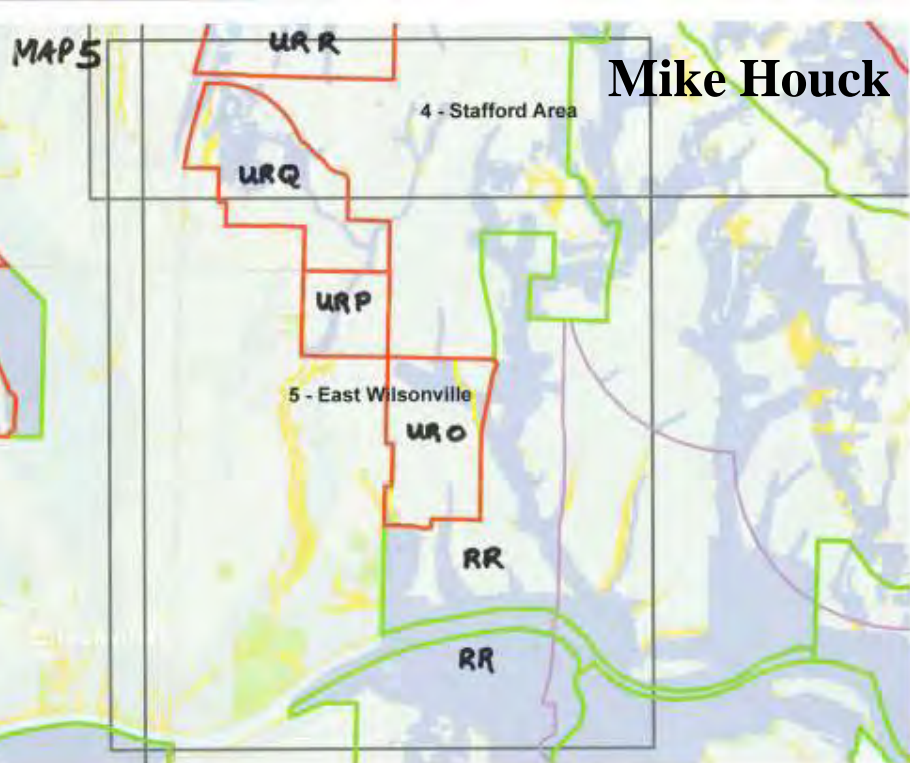
MAP 3  
Mike Houck



MAP 4  
Mike Houck

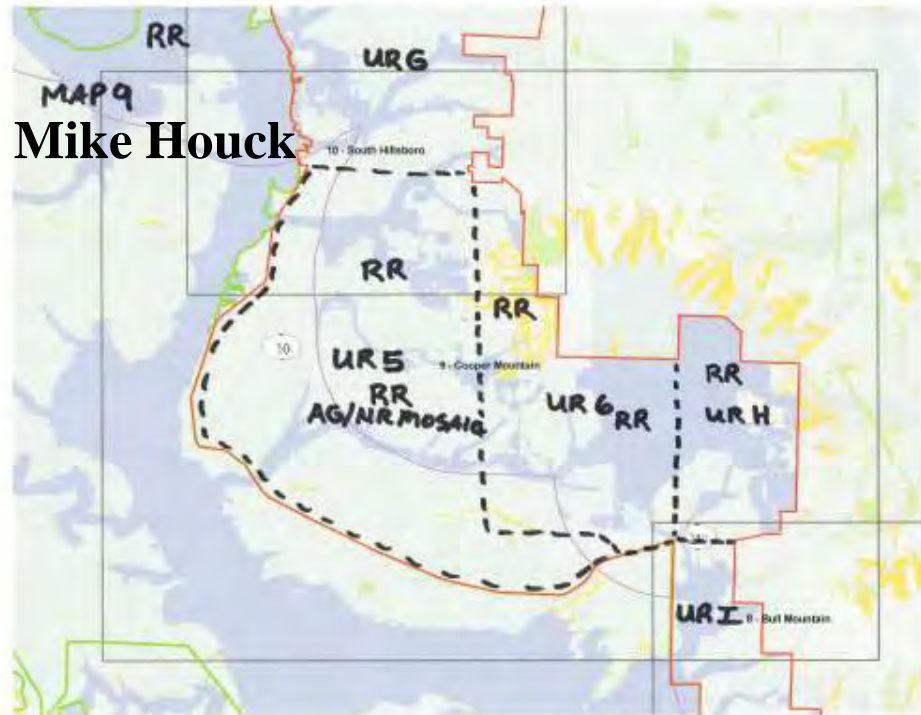




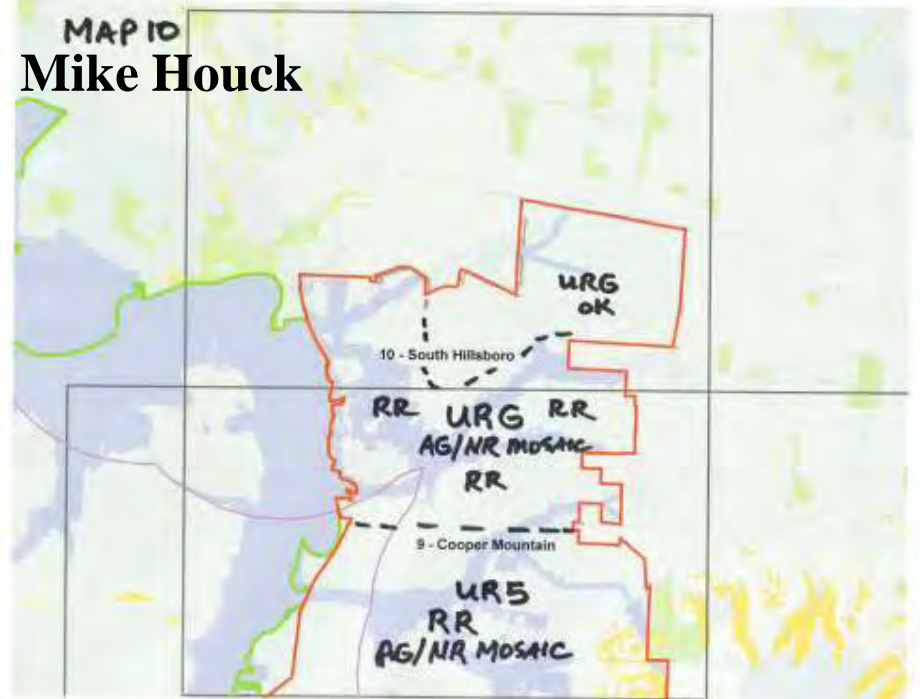




Mike Houck



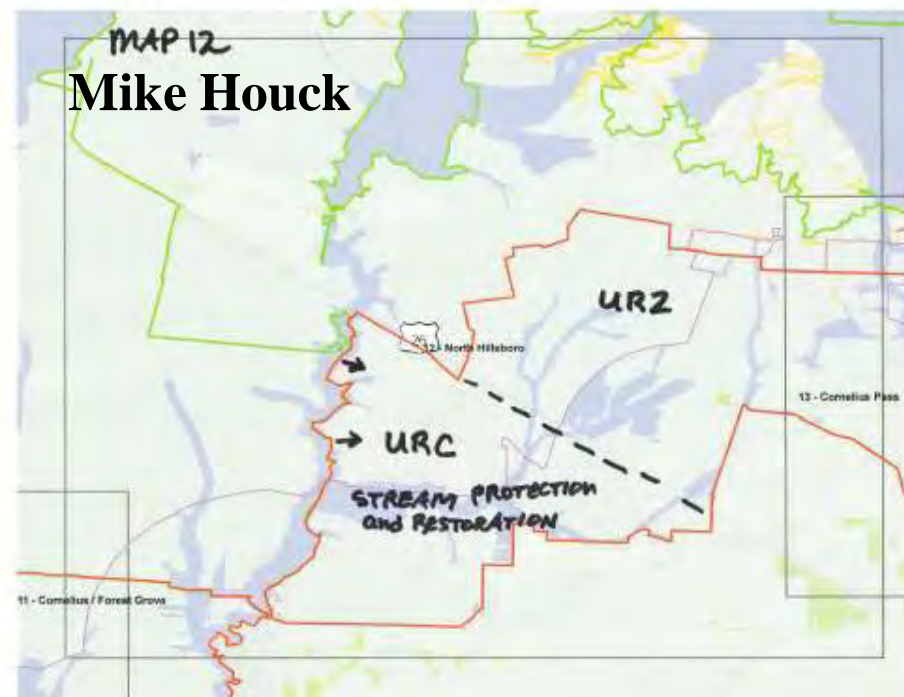
Mike Houck



Mike Houck

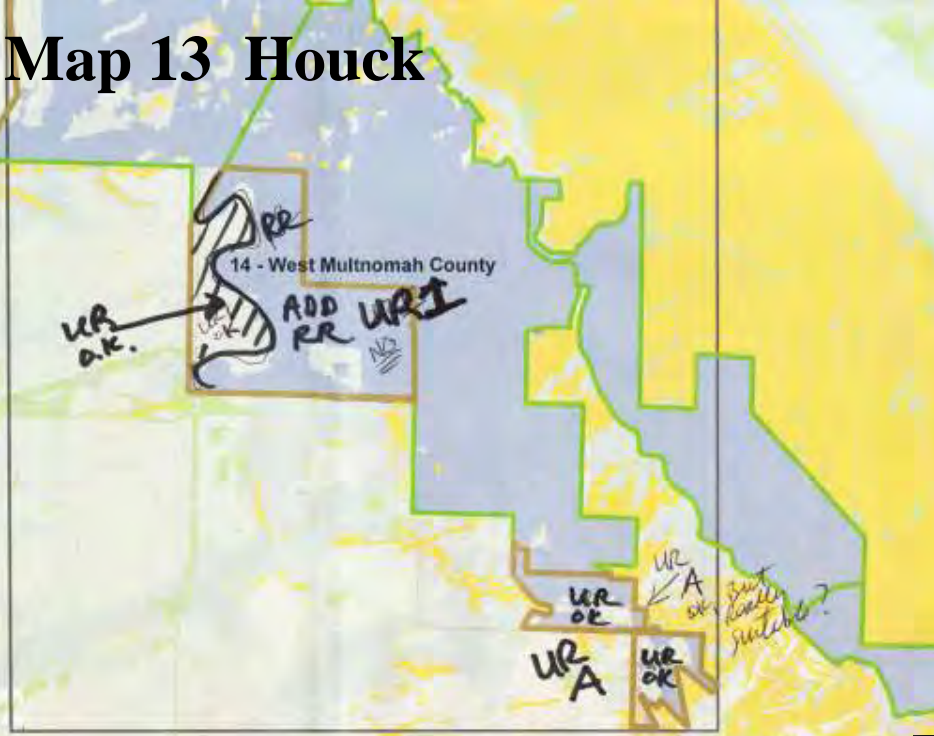


Mike Houck

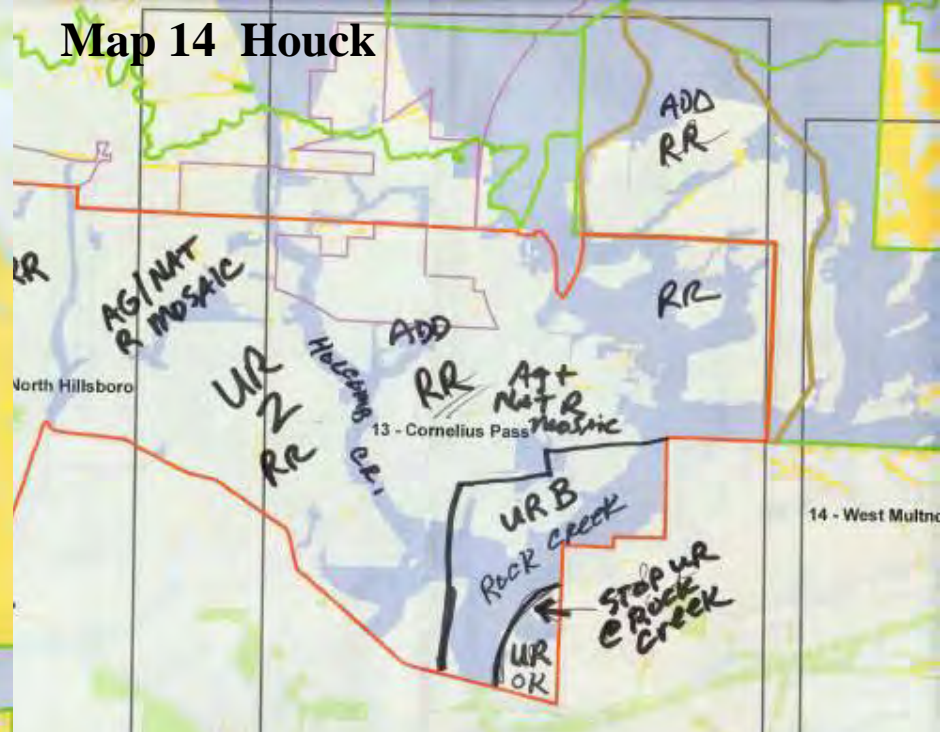




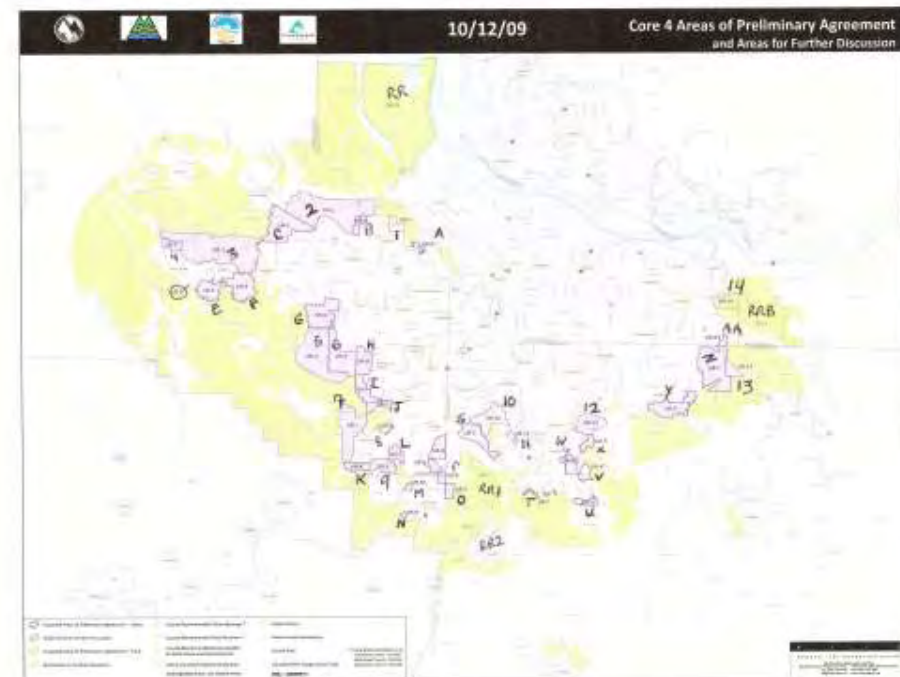
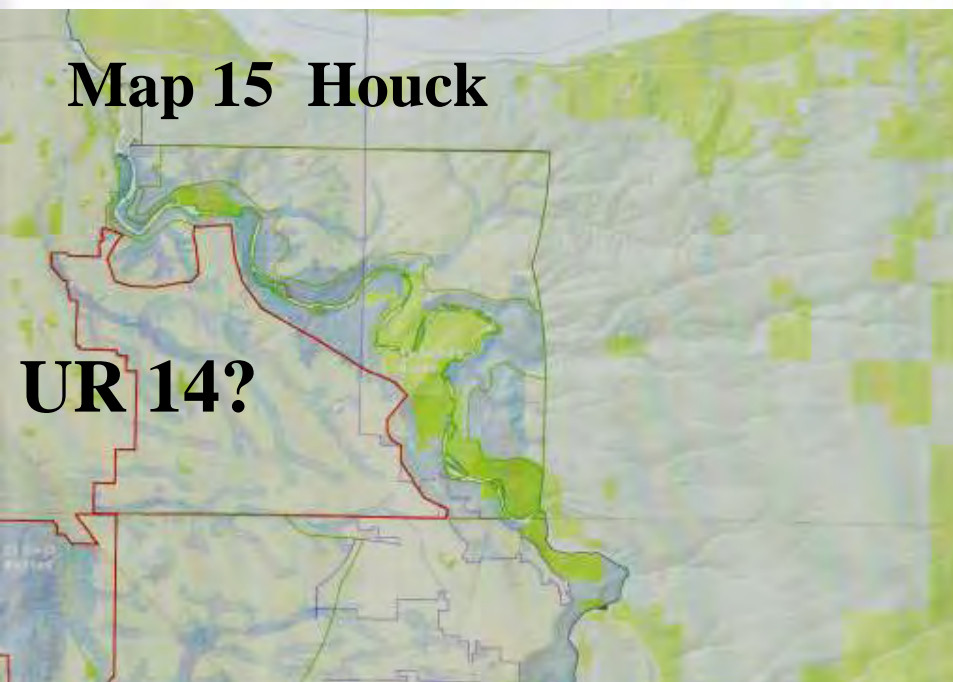
# Map 13 Houck



# Map 14 Houck



# Map 15 Houck





October 14, 2009

Councilor Kathryn Harrington  
Commissioner Jeff Cogen  
Commissioner Tom Brian  
Commissioner Charlotte Lehan  
Members of the Reserves Steering Committee

Re: Neighboring Cities Comments to Core 4

Ladies and Gentlemen:

Please accept these written comments from Metro's neighboring cities as part of the written record for this decision-making process.

First, we appreciate the opportunity to have a seat at the table during this long and extensive process. While those neighboring cities located in Clackamas and Washington Counties have had the opportunity for involvement as part of those counties' reserves designation process, those of us in Marion, Yamhill and Columbia Counties would not without the opportunity Metro has offered us. We appreciate Metro's recognition that its decisions have impacts beyond its current and future boundaries.

The term "neighboring cities" describes a ring of cities ranging in size from a few hundred to 25,000 or so, and located distances ranging from a few hundred feet to several miles from Metro's current UGB. While we are not a homogeneous group of communities demographically, economically, or philosophically, we share some concerns and some values that we would like to share with the Reserves Steering Committee and the Core 4:

1. Without exception, we value our unique qualities, our sense of place, and our physical separation from the Metro UGB. We have no wish to be a formal part of Metro, and some of us are reluctant to engage with Metro at any level. Others of us recognize our interdependence with nearby communities in the Metro boundary, or Metro as a whole, in the realm of transportation, other infrastructure and economic development. We welcome the opportunity to collaborate in solving mutual problems or meeting mutual needs – but, we hope to do so as neighbors, not roommates.
2. All of us serve as significant bedroom communities for the Metro area. This can be explained by several factors:

- a. Housing prices and housing choices within the Metro area are perceived as unaffordable or undesirable by many who live in our communities and work within Metro's boundaries.
  - b. Multiple jobs per household, or even per individual, are a reality in our communities. While living near one's job may be desirable, in many cases individuals and households are splitting the difference between job locations, or one member works near home while another commutes a significant distance. In many of our communities, the school district and state or local government are some of the biggest employers within our city limits, and the biggest employers immediately outside the city limits are agricultural in nature. Given the low average pay in much of the agricultural sector and the limits of the small-town economy, large numbers of working-aged people in our communities are likely to continue to live there and commute to a job somewhere in greater Portland.
  - c. Each of our cities has its individuality, and its appeal to people who find that it feels like home to them. People like their home, their neighborhood, or their neighbors. They are unwilling to leave them to follow employment.
3. Having said that, most of the neighboring communities of any size have completed or plan industrial or commercial expansion. We want to offer our residents more opportunities to shop and work locally, and offer non-residents who work in our communities the incentive to live in them as well. Further, we recognize that we cannot afford to provide the services citizens expect from a full-service city from a residential tax base alone.

We hope the above points will provide some insight into our values, aspirations and concerns. However, we recognize that this process is not about us, it's about you. We would like to address a few global policy decisions you are facing from the perspective of interested outsiders, and conclude with a few comments about specific urban or rural designations that have particular impact on one or more of our communities.

First, we observe that constrained land supplies and increasing densities in parts of the Metro region have led to the flight of younger families and lower income individuals into outlying parts of the Metro region – or, indeed, into our communities. We are concerned that urban reserves drawn too restrictively and an over-reliance on building up in residential areas will intensify this trend. As it stands, school districts on the edge of Metro and in many of our communities are struggling to deal with rapid student population growth. Even greater out-migration might provide a pressure valve for those in existing higher-end neighborhoods, but add infrastructure and housing stock deficits

to educational woes in some outlying Metro areas and many of the neighboring cities.

Second, we would encourage you to err on the side of generosity, not conservatism, when designating urban reserves intended for employment. The most restrictive proposals for urban reserve expansion seem very low on flat industrial land and very optimistic about the possibilities for redevelopment on brownfields or underused sites. In the short run, a shortage of industrial land in Portland or Hillsboro might be a great opportunity for Newberg, Canby, Woodburn, or Salem, but over a 40 or 50 year period it is likely to be a limit on our region's economic potential.

Third, we observe that some areas in the current UGB are unlikely to develop at their originally intended density and may not develop to any significant extent for many years. It seems wise to add employment and residential land near areas where large numbers of people currently either live or work.

Finally, we want to pass on some site specific comments from areas outside of Clackamas and Washington Counties:

Highway 99W/Yamhill County:

- The City of Newberg believes it is very important to keep a permanent greenbelt between Sherwood and Newberg. We think it is appropriate to have rural reserves extending from west Sherwood to the Washington County border.
- Newberg has a strong sense of place, which is partly based on its separation from the Metro area by both distance and topography. The urban reserves should minimize westward expansion along Highway 99W to preserve the distance between the two urban areas. Chapman Road may be a more appropriate southern boundary for the urban reserve area.
- The urban reserve locations west of Sherwood should respect the significant natural landscape features in the area, such as Parrett Mountain to the southwest, and the heavily forested corridor along Hwy 99W west of the railroad bridge/overpass. This forested corridor serves as a natural gateway and emphasizes to travelers heading west that they are leaving the Metro area.

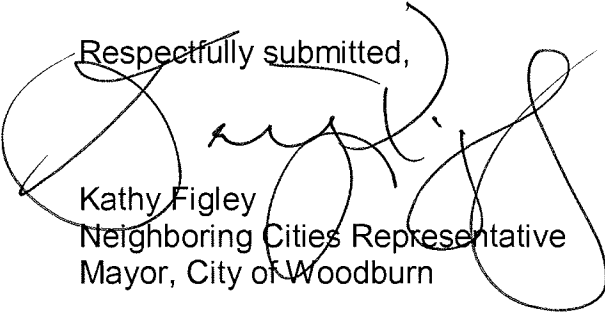
French Prairie/North Marion County:

The cities of North Marion County (Aurora, Hubbard, and Woodburn) and Marion County commissioners and staff firmly support the recommendation to designate the Clackamas County portion of French Prairie as Rural Reserves. We believe that this designation respects the versatility, quality and economic importance of the agricultural sector in this area. We also believe that the infrastructure on both the Clackamas and Marion County sides of the line (particularly the Boone Bridge and the Charbonneau and Donald interchanges) are grossly inadequate to support the industrial uses which are the main possible alternative to

agriculture. There are other locations in the greater Metro area which have greater capacity to support additional industrialization.

In closing, we would like to repeat our appreciation for being offered a seat at the table. We hope our comments have value to you, and we hope for continued positive communication with you.

Respectfully submitted,



Kathy Figley  
Neighboring Cities Representative  
Mayor, City of Woodburn



October 14, 2009  
Comments to Core 4  
Other Cities Washington County  
Chris Barhyte – Tualatin City Council President

Thank you for giving the Cities of Washington County the opportunity to participate in the urban and rural reserves process.

When we started this process back in early 2008 I asked “what do our communities need to do to participate”. I was told “Develop Local aspirations for each city. What does your community want to be?”

Most of the Washington County Cities had already completed an extensive visioning process which assisted each City in completing their local aspirations. We continued to engage our residents and ask “what do you want your community to look like in 50 years?”

We have used this feedback to develop our local aspirations which was one of the key components that helped determine our Urban Reserves. The major theme that emerged was that residents of each City did not want to add an overwhelming amount of density to existing neighborhoods which would change the quality of life in each of the communities forever.

John Kitshaber once said Oregonians don't like **sprawl**, but they don't like high **density** either.

Many of you have asked, “How could Washington County along with its Cities ask for so much land?” The process that lead to those results was well organized and thought out. Let me provide you with the highlights of that process.

The County created a screening system to help them determine how the five mile study area met the rural or urban criteria. The County planning staff spent the 22 months of this process collecting data. The initial recommended urban land need was 107,000 acres and after another round of screening the number fell to 70,000 acres. The final step was to apply the local aspirations of Cities.

Each of the Cities within County needed to determine the estimated population and jobs in 40 to 50 years. As we gathered those numbers we worked on how many people and jobs each City could accommodate within its current Urban Growth Boundary through redevelopment and infill. They compared those numbers to the estimated population to determine how much additional land they would need.

Each City had different local aspirations Cornelius has the desire to add additional jobs land to provide them with a balanced community. Hillsboro would like to add additional land to help them attract additional businesses in their already successful business cluster. This story goes on with community members and elected officials in each City within Washington County.

Each City had a different philosophy and methodology to push additional density to help them accommodate the future population. Tigard for instance has a plan to add significant density to the Tigard Triangle. All the other Cities have similar plans over the next 50 years to help them accommodate the estimated population.

After this phase was complete, it became clear that all the population and employment could not be accommodated within the Cities current boundaries.

All of this brought us to our current estimate of 34,250 acres, half the previous estimate.

Metro asked each of our communities to produce local aspirations.

**We agree that local aspirations is a fundamental process towards a successful land use system.**

Goal 14 actually mentions that local governments may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

**We have gone through an exhaustive process to determine the specific needs right for each community.**

The mission statement of our statewide planning organization is to support **ALL** of our partners in creating and implementing comprehensive plans that reflect and balance the 19 statewide planning goals.

**Again, each of our communities have developed comprehensive plans.**

The vision and purpose of the statewide planning system is to improve the well-being and prosperity of citizens, businesses and communities throughout Oregon.

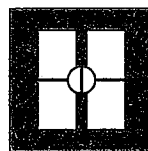
**While governance is essential, the well-being and prosperity of our citizens feels different for each community. Our plans reflect these varying views.**

In closing we ask for your support of our plans developed which were a result of a solid process and focused on our local aspirations.

We feel that our residents vocalized the needs of our businesses and citizens within our fine Cities and we, in turn, are being good stewards of their wishes by incorporating them into the plans presented.

We feel that the original process was sound. Supporting local aspirations will continue to foster livable communities in our region and State.

Chris Barhyte  
Tualatin City Council President  
Representing Other Cities Washington County



October 9, 2009

Regional Reserves Core 4 Committee  
Washington County Board of Commissioners  
Regional Reserves Steering Committee  
Mr. Michael Jordan, Metro Chief Operating Officer  
600 NE Grand Avenue  
Portland, OR 97232

Hon. Councilors, Commissioners and Committee Members:

Each of the undersigned Cities in West Washington County has its own distinct land needs and views on the overall merits of the Urban Reserves recommendations of the Chief Operating Officer (COO) set forth in the *Strategies for a Sustainable and Prosperous Region*. However, we share one common view. The recommendations do not provide and distribute enough industrial Urban Reserves to accommodate the 40-50 year land needs of the mature high tech, the emerging silicon solar manufacturing and incubating bio-pharma industry clusters already rooted in West Washington County.

We believe the Region should take the analyses provided in recently completed Economic Opportunities Analyses (EOAs) for our cities into account when making a final decision about the location and extent of industrial Urban Reserves. We also point out that the amount of land requested for these reserves by the Westside cities is roughly half the total land need for industrial uses identified in our respective EOAs. **Therefore, we respectfully urge the Reserves Steering and Core 4 Committees to recommend adjusting the COO industrial reserves recommendation to accommodate the locations and acreage amounts summarized below:**

EOA-based Industrial Cluster Land Needs	Banks	Cornelius	Forest Grove	Hillsboro	North Plains
2060 Industry Cluster Absorption	218 Ac.	737 Ac.	679 Ac.	3,433 Ac.	516 Ac.

#### Key Issues:

Documents describing the technical reasons that underpin this request are also attached for your reference. In sum, they identify the following issues with several findings and conclusions in the draft Employment Urban Growth Report (UGR):

- Regional industrial manufacturing growth forecast in the UGR does not include any job growth in the silicon solar manufacturing cluster because that sector was erroneously attributed to the power generation/transmission (i.e., utility) sector. This fails to recognize the significant solar manufacturing job growth projected by the State Department of Energy and others contained in the Urban Reserve record. (See, September 29, 2009 Johnson Reid Memorandum.) Moreover, the UGR does not forecast future land needs in the Region for any industry cluster, including high tech, silicon solar manufacturing and bio-pharma – a very problematic omission because of its potentially detrimental long-term State, Regional and local economic base consequences.



- The “one-size-fits-all” UGR approach to industrial land supply and demand does not respond to the distinct large-lot *suitability and location* requirements of different industry sectors in the region. These requirements determine *a priori* whether large-lot employers in any industrial cluster will choose to locate in the Region in the first place. Thus, we believe the UGR large lot analysis substantially understates the true current UGB large-lot capacity and the corresponding long-term land needs of large employers.

### **Risk of Getting it Wrong**

At MPAC, the Reserves Committee (9/23) meeting and at other venues, the COO noted how crucial it will be for the Region and State to carefully consider the risks and consequences of “oversupplying” or “undersupplying” the Region’s short- and long-term housing and jobs land needs. We couldn’t agree more, especially when it comes to the future land needs of the three major industry clusters in West Washington County. These clusters are mainstays and “economic drivers” for the State, Regional and local economies, contributing mightily to the economic “quality of life” of so many households in this County and throughout the Portland Region.

As noted above and in the attachments, we think the UGR substantially underestimates the short- and long-term land needs of the three industry clusters in West Washington County. The economic consequences at the State, Regional and local levels of severely underestimating the amount of land needed for our industry clusters would be devastating, and probably irrevocable in terms of preventing existing industry from continued expansion in the Metro area, lost new business recruitment opportunities and future market competitiveness of the Region. It would simply take Oregon out of the national and international competition for such businesses altogether.

Accommodating the 20- and 40 to 50-year land needs of the three industry clusters as outlined in the above table would go a long way toward avoiding the dire risk that, we believe, is posed by strict reliance on the draft Employment UGR findings and growth policy proposals.

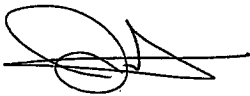
Respectfully submitted:



Mayor Richard Kidd  
City of Forest Grove



Mayor Bill Bash  
City of Cornelius



Mayor Jerry Willey  
City of Hillsboro



Mayor David Hatcher  
City of North Plain



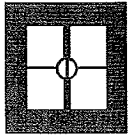
Mayor John Kinsky  
City of Banks

### **Attachments:**

- Staff Memorandum to Westside Planning Directors and City Managers (October 8, 2009)
- Johnson-Reid UGR Findings & Hillsboro Implications memo (September 29, 2009)

# CITY OF HILLSBORO

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8 October 2009

## STAFF MEMORANDUM

TO: Planning Directors/City Managers: Cities of Banks, Cornelius, Forest Grove and North Plains

FROM: Alwin Turiel, AICP, Long Range Planning Supervisor

RE: *Chief Operating Officers Report – Traded Sector Industrial Land Need Comments*

City staff have reviewed Metro's Chief Operating Officer's report, *Strategies for a Sustainable and Prosperous Region*. The Draft Urban Growth Report (UGR) makes a strong case for an aggressive growth management strategy aimed at full realization of the Region's 2040 vision.

It is clear Metro staff is charting a course that will take our Region to new levels. While we look forward to being part of the Region's efforts to implement the 2040 vision, we have concerns regarding the employment lands need analysis and recommendations for urban reserves contained in the UGR. Specifically, our concerns include:

- The analysis of the traded sectors, including the assumptions made, policy choices relied upon and reliance on suitability analysis that does not consider specific industry needs. In particular, we are concerned with the lack of discussion about site specific needs of the traded sector industry anchors and clusters.
- The risk analysis alluded to in the report regarding future industrial sites throughout the Region.
- The conclusion that there is enough zoned capacity for at least the next 20 years for employment uses within the existing urban growth boundary.

### ***Analysis of Traded Sector***

We were somewhat confused by the report's recommendations for treatment of future industrial land needs. Large lot needs appear to be both portrayed as part of total land need and as a specific, special need that may need special accommodation in the years to come. Based on the input Metro has received regarding the specific needs of industry clusters and large lot employers, the emphasis should be on the specific, special needs of large lot users.

For example, the size, shape and location of a site are important factors in a company's determination of its suitability for their intended uses. We may have land available in the inventory, but it may not meet the needs of companies looking for land that meets the demands of their business model and their

valuations of site attributes and tradeoffs against other factors, such as transportation costs and access to labor. Large lots are generally not “fungible” between industry types. For example, solar technology has specific workforce, water and energy supply needs. Therefore, the best locations in the Region for the solar industry are in western Washington County and Gresham. In contrast, metals fabricators find the best locations near other related businesses in their supply chains located around the Portland harbor.

The UGR should take into account the identified site-specific needs of industries when considering demand and supply of parcels region-wide. Those needs include:

- *Geology and physical characteristics:* Low-slope and seismic stability are crucial for many types of industries, as well as avoidance of engineering and the financial risk of infill/brownfields.
- *Ownership patterns:* Appropriately sized lots that are available and developable are crucial for anchor industries in particular. In order to meet future needs large lots should be in single ownership or require minimal assembly. The supply must also be sufficient to allow for competitive land pricing.
- *Utility needs:* High-capacity and redundant power and high-quality water are two of many crucial needs of different cluster employers. Absence of these will, in many instances, negate the possibility of an employer siting on a parcel, no matter how well-suited it is in other qualities.
- *Transportation infrastructure:* Adequate transportation for freight and people movement is a critical component when industries are considering relocation or expansion.
- *Cluster location:* Larger cluster employers, by definition of a cluster, will seek to physically be located to benefit from proximity of firm customer/vendor networks, labor force networks, and other synergistic connections, vendor/service location.
- *Workforce location:* Creative cluster employers (apparel, software, etc.) will likely prefer being closer to creative population centers in Portland -- just as high-tech manufacturers will prefer to be closer to the scientifically-trained workforce.
- *Permitting/Municipal Experience:* Reasonable development costs and certainty are key factors in industry location decisions. For clusters with more high-tech aspects, and therefore very dynamic facility growth plans, it is crucial for sites to be located in jurisdictions with experience in providing flexible, on-time project review and permitting processes. Delays and changes can cost millions of dollars for high-tech employers.

Also problematic is the reliance solely on land suitability for reserves determinations. While this is an important first step, it is not the last step for “right-sizing” urban reserves. The next step must be to determine the amount of land needed for future residential and employment lands. The table below illustrates the Economic Opportunities Analysis employment land demand findings for the five Westside cities. A similar analysis should be conducted for other Region subareas.

#### ***Assumption of the 20-40 year need***

We believe the dissonance between the EOAs produced for the five western cities and Metro’s employment demand analysis must be resolved. Local EOAs are not merely aspirational but, rather, reflect rational demand forecasts prepared in accordance with accepted methodologies under

Statewide Planning Goal 9. According to the cities' EOAs, healthy expansion of the three key industry clusters (hi-tech, green energy and bio-pharma) will require enough market choice in an established supply of suitable large lots (i.e., over 50 acres in size) to support location of additional anchor industries in western Washington County (see table below). In contrast, Metro's report defines large sites as those in excess of 25 acres and estimates the need *in the entire Region* for 29 to 43 sites over the next 20 years.

According to several experts who have commented on the UGR, lands identified as suitable for industrial use are not sufficient to meet the estimated demand for the next 20 to 40 years, as determined by the State Goal 9 economic opportunities analysis (EOA) approach. The conclusion of the Hillsboro EOA is that *Hillsboro alone will need between 20 and 65 sites that are 25 acres or larger, which translates to between 800 and 2,980 acres of land*. The Metro Employment Urban Growth Report states that the analysis does not attempt to determine whether or not there is sufficient large lot capacity inside the current UGB to accommodate the need for large parcels. This question must be addressed in order to arrive at a rational conclusion about how much land will be needed for both the next 20 years, as well as to "right size" urban reserves for future industrial uses.

### ***Risk of Getting it Wrong***

Fundamentally, we disagree with the risk analysis alluded to in the report as it relates to the need for future industrial sites throughout the Region. If we accept the UGR, the Region will not provide sufficient land that experts have identified as necessary to accommodate the needs of industry, including: (1) large lots for anchor sites; and (2) a variety of lot sizes for traded sector cluster needs. Given the importance of industry clusters to the regional and state economy, do we, as a region, want to take the risk of underestimating the amount of land needed for industry clusters?

The importance of industry clusters and their impact on the regional and state economy cannot be underestimated. For example:

- Approximately 66% of all employment in the State's hi-tech sector is located in Washington County.
- The 2007 average semi-conductor wage in Washington County was \$88,222. The industry has been a strong contributor to production of *family wage jobs* in the Region.
- In contrast, the 2007 average Washington County wage for all jobs was \$50,036.
- The city EOAs estimate a multiplier effect of approximately 2 jobs throughout the region for every industrial job created.

We agree with comments previously made by the Port of Portland regarding the risks associated with not providing enough land for the market to operate properly when existing and new industrial employers are seeking sites for expansion. Though it is difficult to accurately estimate the potential opportunity costs of different UGR policy choices, it seems clear that job growth will only materialize if the location, type and quality of buildings and land are available, as specifically required by various industry sectors. In other words, growth capacity starts with a thorough understanding of the nature of land supply within the UGB, as determined by key industries and the jurisdictions planning for economic development, as required by Statewide Planning Goal 9.

The FCS Group "preliminary Vacant Land Supply Findings" indicates there are virtually no sites within the existing UGB that could accommodate a user similar to Intel or SolarWorld. Primary reliance on land



assembly is not a realistic assumption for large anchor industries interested in expanding or locating within our Region. As the region has urbanized, land assembly has become increasingly challenging and costly for many employers.

Sadly, we will never know the exact number of missed opportunities that could result from lack of suitable industrial sites. If firms or their site selection consultants cannot find sites of suitable size and characteristics, they will not even contact an economic development agency in the Region. This leads us to believe there are substantial risks associated with not providing enough land for the market to properly operate.

### **Conclusion**

The UGR should be refined to address the specific needs of traded sector industry clusters. Additional analysis must be included regarding site-specific needs of industries. For the reserves decisions, at a minimum, the Region should leave areas beyond the COO's recommendation determined to be suitable for industrial uses as undesignated to allow for corrections in the event regional industrial growth is greater than predicted in the UGR ultimately adopted.

### **WESTERN WASHINGTON COUNTY SUBAREA FUTURE CLUSTER JOBS DEMAND: 2008-2060**

<b>CITY</b>	<b>2030 TOTAL ACRES EMPLOYMENT LAND DEMAND</b>	<b>2030 EMPLOYMENT CLUSTERS ABSORPTION*</b>	<b>2060 TOTAL ACRES EMPLOYMENT LAND DEMAND</b>	<b>2060 EMPLOYMENT CLUSTERS ABSORPTION*</b>
BANKS	164	29	697	218
CORNELIUS	253	74	782	354
FOREST GROVE	546	54	1,760	326
NORTH PLAINS	235	13	1,589	516
HILLSBORO	5,098	1,648	13,443	3,433
<b>5-CITY TOTAL</b>	<b>6,043</b>	<b>1,744</b>	<b>17,489</b>	<b>4,493</b>
<b>PRELIMINARY CONCEPT PLANS</b>				
	<b>CITY/UGB JOBS CAPACITY</b>	<b>URBAN RESERVES JOBS LAND (2060)</b>	<b>ALL EMPLOYMENT ACRES</b>	<b>UNMET NEED: JOBS LAND</b>
<b>TOTAL ACRES</b>	<b>2,025</b>	<b>6,942</b>	<b>8,967</b>	<b>8,522 – 49%</b>

*\*Source: Johnson-Reid EOAs, 2009; Medium Demand Estimates*



## MEMORANDUM

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DATE: September 29, 2009

TO: Patrick Ribellia, Esq., Planning Director, CITY OF HILLSBORO  
Richard Meyer, Director of Development & Operations, CITY OF CORNELIUS  
Jon Hollan, Community Development Director, CITY OF FOREST GROVE  
Don Otterman, City Manager, City of NORTH PLAINS  
Jim Hough, City Manager, City of BANKS

FROM: Bill Reid, Principal  
JOHNSON REID, LLC

SUBJECT: Urban Growth Report Findings & Western Washington County Cluster Implications

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JOHNSON REID has reviewed the September 15, 2009 Draft Urban Growth Report ("UGR"). With the Oregon Land Conservation & Development Commission ("LCDC") visiting Hillsboro to study urban land use issues, we specifically reviewed the UGR to understand any continued discrepancies between it and Hillsboro and the West Washington County Economic Opportunities Analyses ("EOAs") and resulting land need estimates. The West County Partners are particularly concerned about industry cluster opportunity cost should land be under-provided over the planning periods discussed. The focus of this memorandum, then, is a review of the UGR with specific focus on following UGR appendices which provide detailed analytical findings pertinent to west County's economic future:

- Appendix 3: Industry Cluster Forecast; and
- Appendix 4: Large employer/large lot analysis

### Cluster Analysis Inconsistencies Between the UGR and West County EOAs

In the Draft UGR, Metro has added a formal industry cluster analysis apparently based on its broader trend economic forecasts. Figure 1 provides a contrast between the EOA industry cluster Medium and High Growth scenarios and the Metro Cluster analysis (Appendix 3) High Growth Scenario.

Based on the comparison and review of the Appendix 3 Industry Cluster Forecast, JOHNSON REID has strong concerns about the adequacy of the current analysis in indicating employment growth in the key, emerging Solar industry cluster.

- On Page A3-1, Metro attributes SolarWorld – photovoltaic ("PV") solar panel manufacturer – to the electric power generation, transmission, and distribution sector. This is a potentially serious problem in Metro's analysis that is worth revisiting, as SolarWorld manufactures silicon-based photo cell panels and is not actually in the business of power generation and transmission, i.e. a utility.
- SolarWorld and other PV panel manufacturers, as documented in the west County jurisdictions' EOA studies, are actually in the same industry classification as silicon-based microprocessor production like Intel and others prevalent in Washington County (NAICS 334).
- According to Metro's documented methodology, that would put SolarWorld and other future manufacturers in the "Advanced manufacturing" cluster as categorized by the Portland Development Commission.

Figure 1 on the following page provides a comparison of west Washington County key cluster growth through 2035 with analogous cluster growth estimate by Metro in Appendix 3.



By 2030, Metro anticipates the Advanced manufacturing cluster (definition analogous to the Existing High-Tech cluster in the Hillsboro area) to add roughly 8,900 jobs metro area-wide under its High growth scenario. In contrast, the west County EOAs estimates that existing High-Tech in west County can be expected to add between 6,100 and 24,700 jobs by 2035. Although we view Metro's estimate conservative, their number can be viewed as consistent with the slower cluster growth estimate for west County as the cluster and what remains of available land are greatly located in the vicinity of Hillsboro.

**FIGURE 1: WEST COUNTY CLUSTER GROWTH COMPARISON, EOA & METRO UGR**

<b>Hillsboro Cluster</b>	<b>Hillsboro EOA New Jobs to 2035</b>		<b>Metro UGR 2030 New Jobs</b>
	<b>Medium Growth</b>	<b>High Growth</b>	<b>Metro UGB (High)</b>
<b>Solar</b>			
Primary Manufacturing	5,477	8,849	
Induced Manufacturing	2,028	3,265	See Existing
Induced Other Activity	2,713	4,360	High-Tech
<i>Subtotal</i>	<i>10,218</i>	<i>16,474</i>	
<b>Bio-Tech</b>			
Primary Manufacture	262	876	
Induced Manufacture	96	321	
Induced Other Activity	<u>128</u>	<u>428</u>	
<i>Subtotal</i>	<i>486</i>	<i>1,625</i>	~3,800
<b>Existing High-Tech</b>			
Primary; Manufacture	1,754	7,044	
Induced Manufacture	752	3,019	
Induced Other Activity	<u>3,633</u>	<u>14,592</u>	
<i>Subtotal</i>	<i>6,139</i>	<i>24,655</i>	~8,900

SOURCE: City of Hillsboro EOA & Metro Draft 2009-2030 Urban Growth Report

Based on review, we would recommend discussions with Metro to revisit the apparent absence of Solar manufacturing from its cluster analysis in coordination with West Washington County jurisdictions. By Metro's own description, Solar should be included in their Advanced materials job forecast (NAICS 334), but presently it is not.

Interviews with solar firms, industry experts, Business Oregon, and examination of numerous national green/clean energy industry studies – along with a formal forecast methodology we developed with the assistance of the Oregon Department of Energy – all conducted by JOHNSON REID indicate that west County should see anywhere from a total of 10,200 to 16,474 Solar cluster jobs. Those would include the Solar firms themselves (Primary), supply and parts manufacturing vendors (Induced Manufacturing), and all other service, wholesaling, etc. commerce that would be generated as well and locate in west County (Induced Other Activity).

Recommendations by Metro regarding land need and UGB sufficiency currently appear to under-appreciate the growth potential of Solar manufacturing in western Washington County and Portland metro region-wide. SolarWorld is already building North America's largest solar panel manufacturing facility. And as the west County EOA analyses indicate, the Solar energy cluster can exceed 54,000 jobs metro area wide based on



Oregon Department of Energy solar megawatt capacity expectations. There is, then, an opportunity for west Washington County jurisdictions to share information with Metro to refine understanding of the Solar PV industry.

However, until the Solar PV manufacturing industry and emerging cluster is better accounted in Metro's analysis, there is a significant lost economic opportunity for west Washington County, as well as for regional and State efforts to attract and grow clean energy industry in terms of land demand and provision for that emerging cluster.

#### Large Lot Demand Inconsistencies Between the UGR and the West County EOAs

In the Draft UGR, Metro has conducted additional analysis of large parcel/lot demand resulting from 20-year economic growth. Despite these refinements, and until the Solar manufacturing cluster is discussed further, we caution that there is underestimation of large parcel demand in the current, Draft UGR. Additional consideration by Metro of the issue will likely resolve discrepancies in west County and Metro analyses.

Despite that, however, we would urge west County jurisdictions to further coordinate with Metro regarding some additional refinements that will benefit land need modeling. In general, current Metro large lot methodology does the following:

- Translates industry job growth forecasts into a distribution of firms by size.
- Translates firms by size into likely land use categories by size.
- Translates firms by land category into a distribution of single/aggregated parcel demand.
- Metro then matches demand for large parcels based on firm sizes to the metro *region-wide* supply of parcels sized 20 acres or greater.

Although the analysis is a welcome addition to the UGR, JOHNSON REID recommends that additional consideration be provided from the perspective of industry/cluster need characteristics rather than a ledger-type comparison of firms by size and parcels by size, all else equal. Although ultimately parcel need is the topic in question for employers, different industry clusters have very different and varied location, infrastructure and workforce needs that in many cases are more important than purely parcel size itself. Following is a review of primary issues that merit additional consideration when considering demand and supply of parcels region-wide.

- **Geology and physical characteristics:** Low-slope and seismic stability are crucial for many types of industries, as well as avoidance of engineering and financial risk of infill/brownfields.
- **Utility needs:** High-capacity and redundant power and high-quality water are two of many crucial needs of different cluster employers. Absence of these will in many instances negate the possibility of an employer sitting at a parcel, no matter how well-suited it is in other qualities.
- **Workforce location:** Creative cluster employers (Apparel, Software, etc.) will likely prefer being closer to creative population centers in Portland for instance, just as high-tech manufacturers will prefer to be closer to scientifically-trained workforce.
- **Cluster location:** Larger cluster employers, by definition of a cluster, will seek to physically be located to benefit from proximity of firm customer/vendor networks, labor force networks, and other synergistic connections., vendor/service location.
- **Permitting/Municipal Experience:** For clusters with more high-tech aspects, and therefore very dynamic facility growth plans, it is crucial for sites to be located in jurisdictions with experience to provide flexible, on-time project review and permitting process. Delays and changes can cost millions of dollars for high-tech employers.





All of these factors are well documented and specific to each cluster in different State and regional studies, including the West County EOAs. We would encourage west County jurisdictions to partner with Metro to better account industry land needs by cluster rather than the current, more ledger-style UGR approach.

For many employers, each of the above site qualities – in addition to parcel size alone – amount to a “must have” for location and growth. Without most of the above qualities ensured, firms will not consider a site no matter how perfectly sized it is. In other words, a more elaborate discussion of large parcel need by cluster industries is merited in the UGR. Without such analysis, many parcels currently considered adequate based largely on size are likely not suitable at all. This reinforces comments made in UGR focus groups to the effect of firms increasingly having to look outside of the metro area for sites over 20 acres – a reflection of industry/firm needs, not purely site size.

#### General Inconsistencies Between the UGR and West County EOAs

Finally, it is important to note how fundamentally the UGR and the west County EOA analyses differ in overall approach. The UGR is an assessment of long-term land use patterns and needs based on regionally-identified and adopted land use policies preferences, existing and future policy tools and investments to facilitate land use efficiency aspirations, and resulting urbanized land need based on land use policy preferences. Like the west County EOAs, UGR land need estimates are based on employment growth forecasts. Unlike the EOAs, employment growth as forecast by Metro is highly based on national trend and regional trend since 2002. This has the following broad implications:

- 2002 to 2006 marked lack-luster growth in the region’s high-tech sector compared to well-documented industry growth in the 1990s. In other words, the Hillsboro area specifically is capable of growing far faster than purely trend forecast would indicate, particularly informed by 2002-2008 or 2008. This is already being evidenced by the fact that SolarWorld’s facility is the largest of its kind in North America.
- The Metro forecast is highly informed by the Global Insight’s proprietary national economic forecast. Accordingly, the resulting Portland metro area forecast for key manufacturing sectors are informed by national manufacturing trends, which for more than two decades have generally been declining. However, as is obvious in Washington County, high-tech manufacturing industry employment if planned and nurtured can both grow dramatically and highly contrary to national industry trends over the long-haul.
- The Metro UGR never considered lands north of the existing West Washington County UGB as candidate expansion areas for employment growth, modeling, and employment land capacity study (Appendix 2: Documentation of MetroScope Scenario Assumptions). This is important, as the EOAs documented from numerous industry and cluster interviews that the Hillsboro vicinity and Gresham areas are the only two specific submarkets in the Portland metro area that are suitable for existing and critical water and electricity infrastructure, workforce, and access for the vast majority of high-tech manufacturing growth prospects, particularly solar and likely biotech for at least the 20-year planning horizon. Therefore, the attribution of high-tech manufacturing industry growth to locate outside of these two specific geographies should be reconsidered.

The bottom line to these general differences is the following: Western Washington County jurisdictions examined economic opportunities from the “bottom up,” i.e. detailed examination of industry growth and need potential unique to the existing and emerging high-tech firms among others. By comparison, the Metro UGR relies on national and regional trend economic analysis, an econometric model shaped by policy preferences, and mathematically-derived growth capture factors further shaped by candidate urban expansion areas, or a “top down” approach. The UGR process did include outreach to industries with focus groups, but the emphasis of those meetings was more on built environment trends for different uses. This contrasts with industry cluster growth potential, unique industry needs, economic development recruitment



priorities, and other issues that the west County EOA process did cover. There is accordingly an opportunity for information gathered during the west County EOA process to assist Metro with its approach to key regional industries.



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**Comments before the Urban Rural Reserves Steering Committee**  
**By Jeff Stone, Director of Government Relations**  
**Oregon Association of Nurseries**  
**October 14, 2009**

As the representative for the entirety of agriculture, it is important to recognize that this sector includes wine, farm, nursery, food processors and forestry interests. All are in the natural resource family but have very different needs and hydraulics of an urban and rural reserve process.

**The process needs to bring certainty**

In 2007, the Oregon Legislature passed Senate Bill 1011 - which embodied a leap of faith - daring to take a new look at the tools to provide certainty for urbanization and agriculture for an extended period of time. Setting Urban and Rural reserves were but one step and we supported it. The OAN continues to believe that providing reasoned places to grow reduces the pressure to urbanize high producing agricultural land. Agriculture is not a "default" place to urbanize - rather is an economic engine that is viable and a sustainable industry. The action passed by the 2007 is our generation's Senate Bill 100. It could have profound impacts on how urban and rural lands coincide or collide. Earlier this month I testified before the State House Agriculture Committee regarding the process we have dedicated 19 meetings and 22 months of work. I suggested to the committee that this process be given the opportunity to render a recommendation before jumping to a conclusion about outcomes and fairness.

What the promise and faith of SB 1011 really comes down to is certainty. It is certainty about what we want our communities to look like, where we grow and urbanize, where we place the value of the agricultural sector - the very sector that provides food and clean air for our citizens. It is through this prism of certainty that we can and must do better in looking at the next 50 years and chart out a new path, one that provides jobs, housing and livability.

This effort is also about planning. Much has been made about if the urban and rural reserve 40-50 year outlook is appropriate. I contend that it is. You look at different planning cycles for agriculture and it becomes clear. Crops such as strawberries, wine and rhododendrons take between 1-7 years to plant and bring to market. Shade trees can take between 7-15 years; stands of forests can be 40 years. Certainty for production over that life cycle of a plant is essential.

**Land designations need to be a blend of healthy, necessary and fair**

The Nursery and Greenhouse industry is uniquely situated to speak to the pressures of urbanization and the role of agriculture since the members I represent are both urban and rural. We are a traded sector, a natural cluster, and hopefully a voice of reason on an issue that at times devolves into emotion or becomes an academic process that is detached.

The natural resource community is not monolithic. For example, there are nursery members who wish to be brought into urban reserves in Washington County at the same time the Washington County Farm Bureau has made a passionate plea for not taking prime agricultural land out of production. We have niche markets emerging with local food sheds along with a growing global food demand that may place a greater burden for this geographic area to produce.

One clear issue stands out as a major concern to the agricultural community - undesignated lands. This land designation may in fact have a destabilizing effect on agricultural production. Speculation for future urbanization outside of an urban reserve could create greater uncertainty and the opposite effect that the creators of urban and rural reserves intended.

We are truly blessed to have the type of agricultural production we have in the Willamette Valley. Hundreds of crops, the best farm land, from Boring to Eugene cut a swath of premier nursery production. Many on this committee has heard the phrase "foundational agricultural land" - well just outside the UGB boundary is J Frank Schmidt & Son - the largest shade tree grower in America. Without success in this process, it is just a matter of time before they are urbanized.

As one of the associations that passed the legislation that created this body, we were careful not to assign acre numbers to urban and rural reserves. It would have been a disservice to this process and the many viewpoints represented around the table. However, they need to be a blend of lands that are necessary and fair. This is why restricting the number of undesignated lands requires a healthy discussion of what the correct level of urban and reserves are needed for the region to prosper.

Let's lay all the cards on the table. The nursery industry is inextricably tied to the success of homebuilding. Homebuilders use



our plant material in their landscaping and the free fall drop in that market has impacted my industry. The Oregon Homebuilders Association recently told me that their membership could be down as much as 30%. That is staggering and mirrors what we see nationally. The nursery and greenhouse industry may see, over a two year period, sales from \$1 billion annually drop \$300 million. So my point is that we have every interest in creating certainty for the urban environment. We have many nurseries that are inside and outside urban centers.

We just heard a stirring speech from Hillsboro Mayor Willey. It was passionate about the need to make sure we do not foreclose our future - to allow for industries to create jobs. I agree with Mayor Willey. I like the mayor's example of the jobs being created by Solar World and the need to make sure that employers like this are attracted to the region. Solar World, it is worth noting, reused an existing building and is a great example of using existing infrastructure.

### **Agricultural land is employment land**

As land is being designated for industrial or commercial design through the urban reserve process, it is important to hold cities and counties accountable for that design. We have seen far too often that lands reserved for industrial use are converted to other priorities. Often these lands are identified due to their proximity to transportation corridors and services. These lands are predominantly agricultural lands.

As we hear from the industrial community, the same tenants are true for agriculture - clusters are needed and a critical mass of production is essential for economic survival. The decision makers in the urban and rural reserves process need to remember that agricultural land is employment land. These lands are not just flat lands waiting for a suitable use; rather it is already in use providing commerce and jobs. That makes a decision of land designation a choice. This is an important distinction because the choices being made are real and have short and long term ramifications.

As this committee has circled the maps, evaluating foundational lands versus suitability factors - we have never stated that changing the use in an area is replacing one type of employment with another. That discussion needs to begin and be an honest assessment of community values and needs.

### **Recommendations to the Core of 4**

I appreciate the preliminary report delivered by the Core of 4 of where seems to be some tentative agreement around urban and rural reserves. There are areas that agriculture may differ - predominately in Washington County and parts of Clackamas County that reach into foundational agricultural lands.

Over the next several months I would encourage you to consider the following:

- **State agency comments:** It is my view that the letter put together by the state agencies highlighted many of the challenges and opportunities facing the region. Richard Whitman is correct in noting that just because an area is designated a rural reserve - it does not mean it is protected from development. In fact rural residential can still convert farm land - so the designation does not lock up farm and forest lands as many would think.
- **Rural Reserves need a common denominator:** Much of the discussion during our numerous meetings has focused on urban reserves and there appears to be a wide array of definitions and reasoning for rural reserve designations. Rural reserves should not be a defacto environmental overlay (such as riparian areas, a wildlife refuge, flood plains etc) and should focus on areas that are under threat of development.
- **Implementation is critical:** It is important to get the urban and rural designations correct. If areas that meet standards for both urban and rural reserves are listed as undesignated, it will create unintended consequences and destabilize the certainty that is essential. If the metro region does not get the reserve process correct, it is likely we will see a fix in the 2011 State Legislative Session.

### **Conclusion**

Issues for agriculture include the right to farm, enhancing production in a way that is environmentally sensitive, economically viable and has access to water and transportation corridors. Regardless of if an area is designated as urban and the conversion to non farm use takes time, we need to acknowledge that there is a cost to change over land for development.

Foundation lands, which we find throughout the rich farm land in the Willamette Valley, deserve consideration for protection. The Urban-Rural Reserves process should result in greater efficiency of

land use and ensuring that conversion of urban reserve land meets a standard of delivering industrial land.

We must together seek balance and recognize the impact and consequences of our actions. The OAN will continue its good faith effort to assist you in shaping the form of the state we both love.

Thank you for your time and attention.

Urban Development Seat

# **URBAN AND RURAL RESERVES**

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*COMMENTS AND RECOMMENDATIONS ON BEHALF OF THE HOUSING  
INDUSTRY*





# OUR SUPPORT

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- ✘ The builders and developers of our region support this process and are confident in its success.
- ✘ Urban and Rural Reserves will allow us to go beyond just managing growth, to making smart growth decisions.
- ✘ This process will help us to avoid the pitfalls of the past, by directing future UGB expansions to areas that truly make sense.
- ✘ For all of these reasons and more, our industry was a strong supporter of SB1011.



# URBAN RESERVES

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- ✗ We can focus future expansion in the areas that we know will succeed:
  - ✗ By identifying areas where existing and planned infrastructure investments can be leveraged.
  - ✗ By targeting growth in locations desirable to current and future employers.
  - ✗ By focusing future expansion in areas beneficial to existing commercial and employment centers.
  - ✗ By expanding in areas that can support a range of housing options and price points.



# URBAN RESERVES

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## ✗ A generous Urban Reserve:

- ✗ Will promote housing affordability and choice\*.

*\*The UGR and Housing Choice, Johnson Gardner, May 2009*

- ✗ Will provide ample opportunity for sought-after industries to acquire suitable parcels for location and expansion.
- ✗ Will provide for a broad range of industries, creating a diverse economy that is more competitive globally.
- ✗ Will ensure that adequate land is available for the park and school facilities needed for the growing population.
- ✗ Will allow our future leaders to make streamlined decisions when opportunities arise.



# RURAL RESERVES & UNDESIGNATED LANDS

- ✘ Rural Reserves will provide certainty:
  - ✘ For the agricultural industry.
  - ✘ For land owners.
  - ✘ For all of us that enjoy a connection with rural living.
- ✘ Undesignated lands should be expanded:
  - ✘ As protection for all areas of the region, just in case today's estimates fall short.
  - ✘ Expansive undesignated lands are critical to preserving opportunities for future generations.



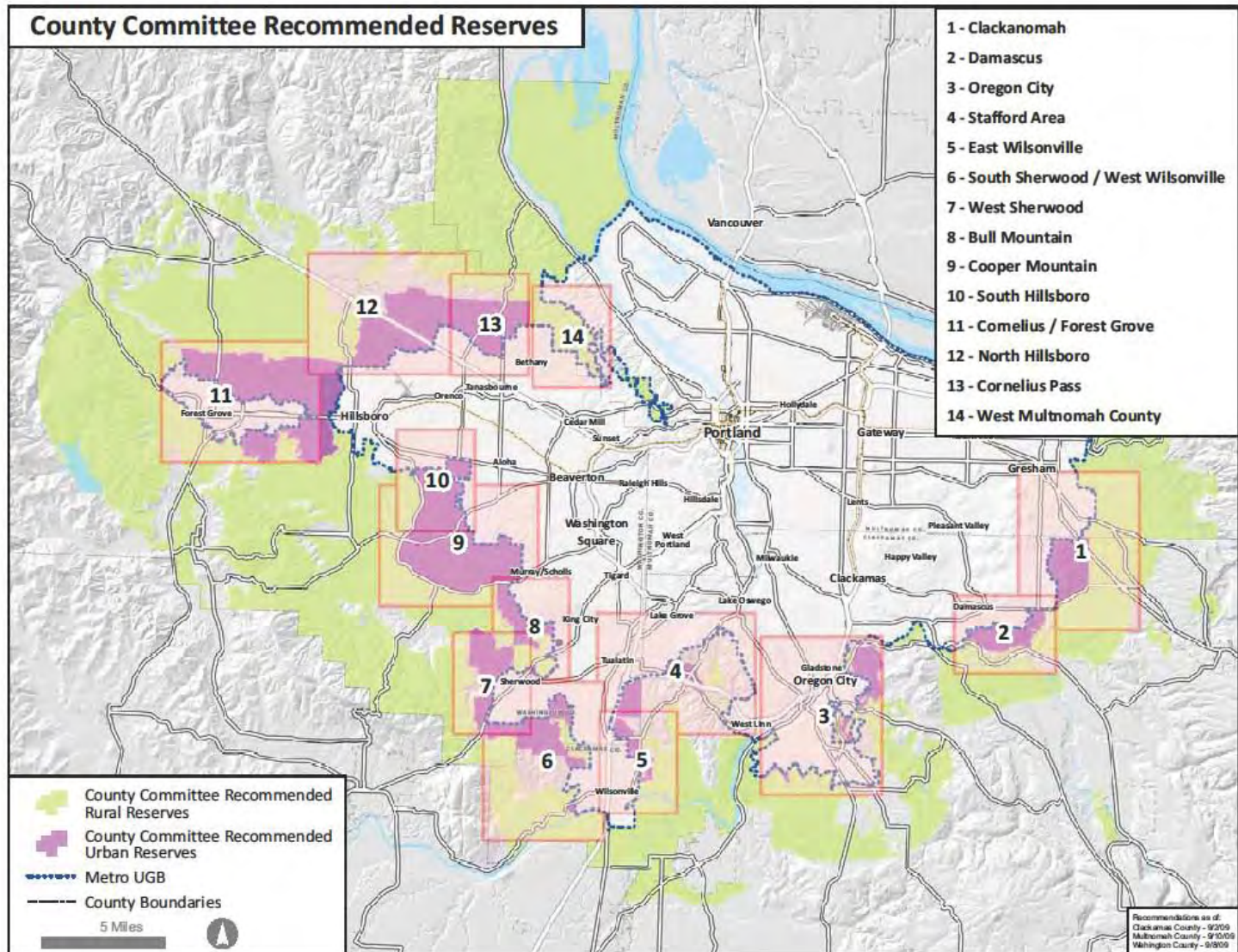


# 50 YEARS

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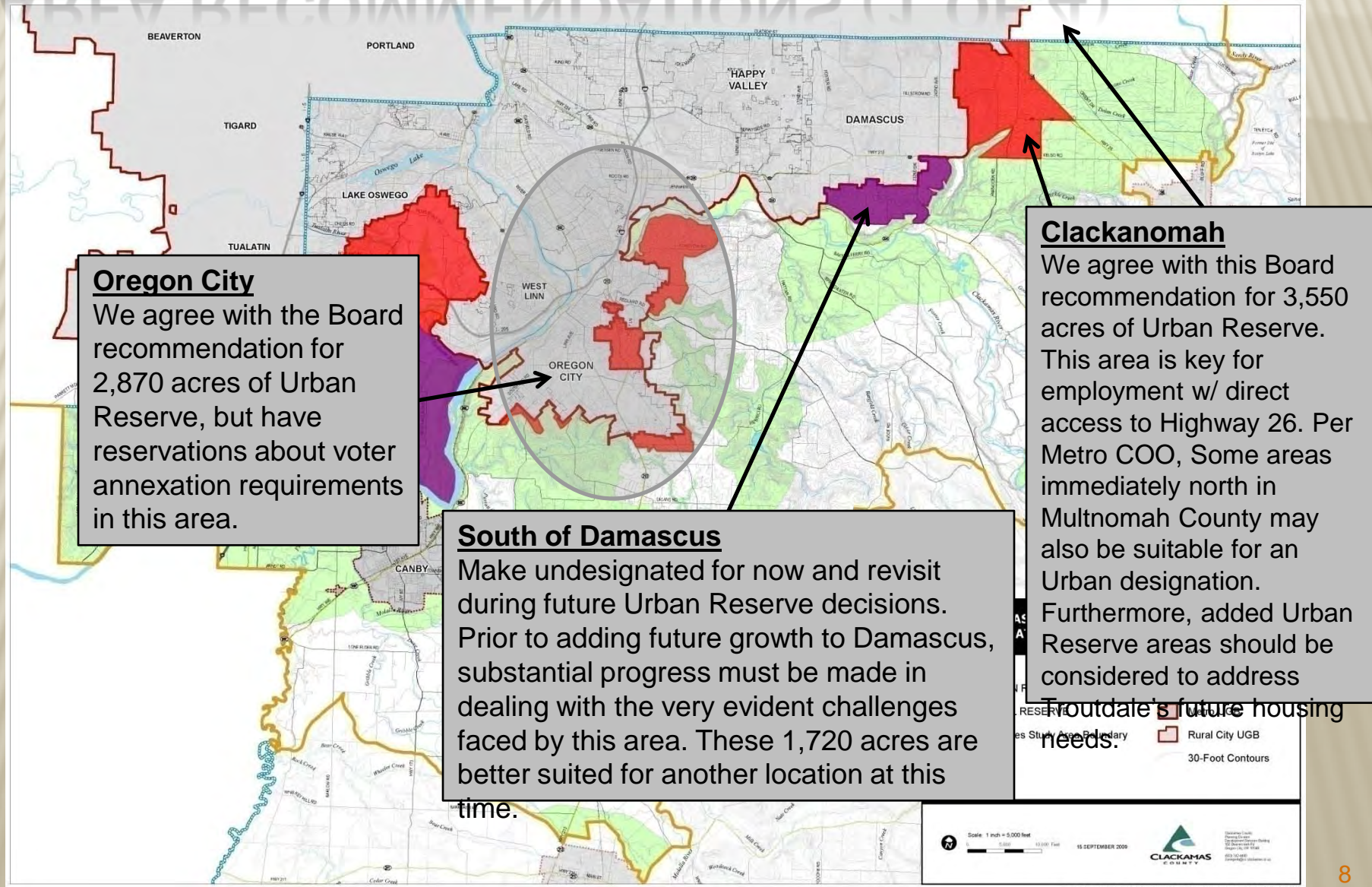
- ✗ These decisions are based upon a long term timeline, and as we all know, many things will change over the next 50 years:
  - ✗ Advances in technology will resolve many of today's identified infrastructure challenges.
  - ✗ The definition of “suitable” can and will change over time.
  - ✗ Local administrations will change, governance opportunities should be feasible by location only.
  - ✗ Today's policies and aspirations should not dictate whether or not governance will be available tomorrow.
  - ✗ Urban Reserves can be reevaluated with more frequency. Our crystal ball is foggy; undesignated lands should be prominent.

# RECOMMENDATIONS – METRO COO AREAS

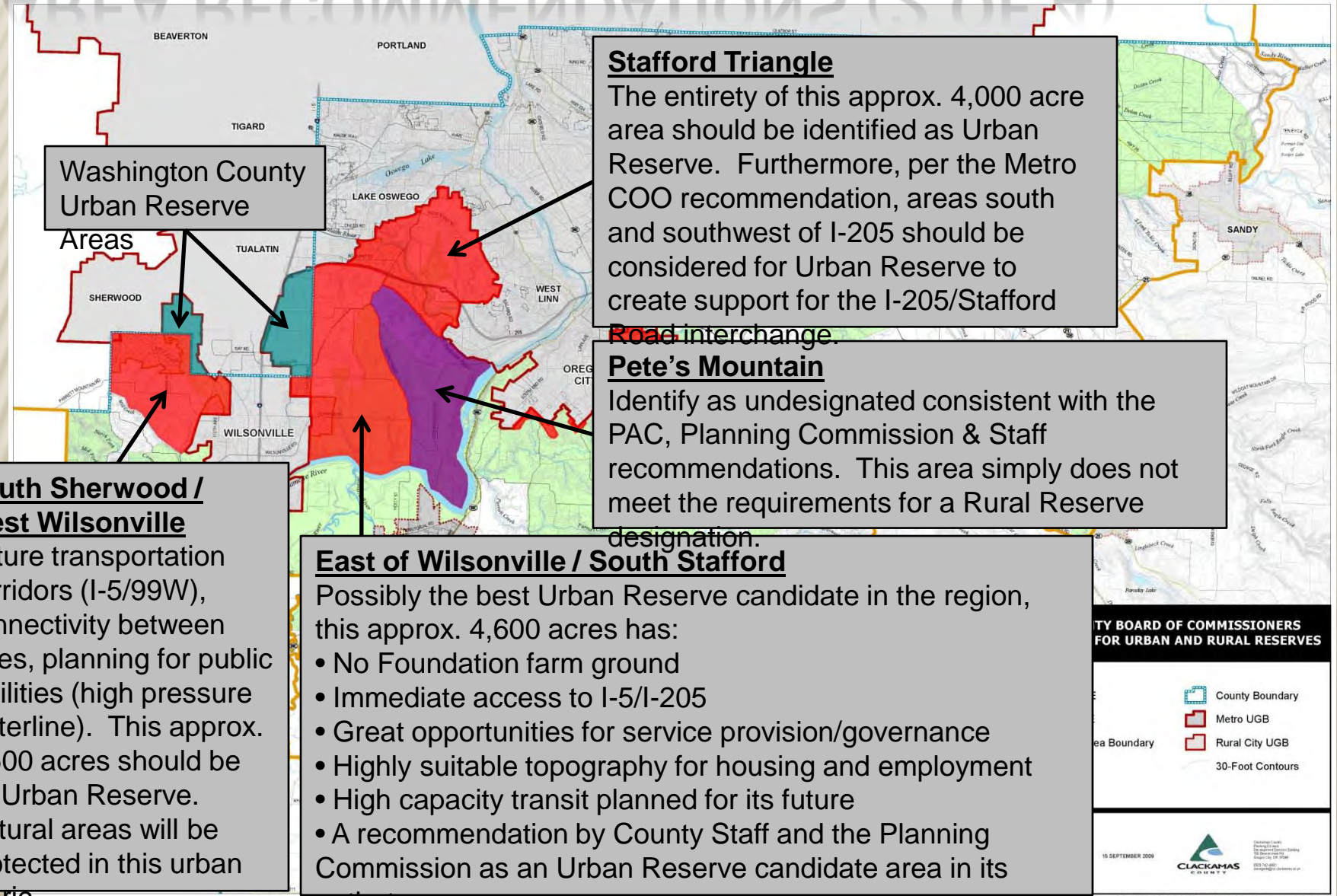




# AREA RECOMMENDATIONS (1 OF 4)

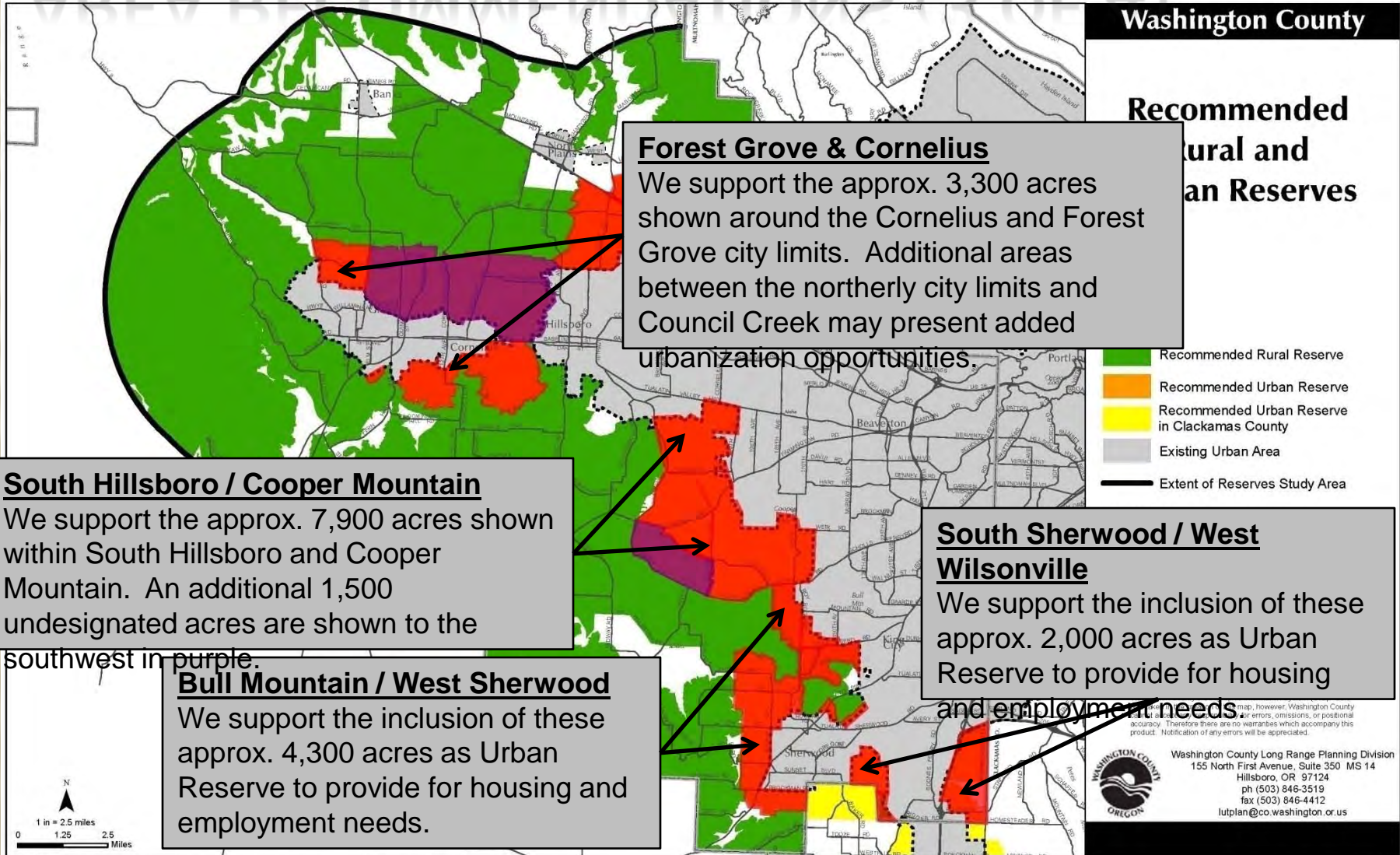


# AREA RECOMMENDATIONS (2 OF 4)





# AREA RECOMMENDATIONS (3 OF 4)



# AREA RECOMMENDATIONS (4 OF 4)

## **North Hillsboro / Helvetia / Cornelius Pass**

We support these areas as Urban Reserves, which encompass approx. 8,600 acres. We wish to stress the importance of an Urban Reserve designation on both sides of the Highway 26, especially near interchange locations where substantial investments already have been made.

## **Forest Grove & Cornelius (North)**

Although we support the areas identified by the Coordinating Committee as Urban Reserve, we recommend retaining the area east of Highway 47 shown in purple as undesignated for future consideration.

## **Undesignated Lands - All Three Counties**

Undesignated lands must be dramatically increased to be applied as a safety valve in preserving opportunities for future generations.

## **Washington County**

## **Recommended**

## **East Bethany**

These approx. 2,600 acres are within Multnomah County, but would serve as a logical expansion of a new urban area (North Bethany) that is well underway. This is a great opportunity to leverage planned and existing infrastructure investments. Furthermore, within an urban setting, needed north/south connectivity could be realized that would be beneficial to all residents in this area (Saltzman Extension).

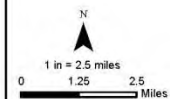
County Boundary

### **Disclaimer:**

The information on this map was derived from digital databases on Washington County's Geographic Information System (GIS). Care was taken in the creation of this map, however, Washington County cannot accept any responsibility for errors, omissions, or positional accuracy. Therefore there are no warranties which accompany this product. Notification of any errors will be appreciated.



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# URBAN RESERVE RECOMMENDATIONS

URBAN RESERVE AREA	ACRES	NOTES
Clackanomah	3,500	Areas in Multnomah County are also suitable
Oregon City	2,900	Concerns w/ voter annexation in this area
Stafford Triangle	4,000	South of I-205 should be considered as well
E. Wilsonville / S. Stafford	4,600	A key building block for future growth
S. Sherwood / W. Wilsonville	5,500	I-5/99W connection, high pressure waterline
W. Sherwood / Bull Mountain	4,300	For future housing and employment needs
S. Hillsboro / Cooper Mountain	7,900	Undesignated areas west of Cooper Mountain
Forest Grove / Cornelius	3,300	Areas south of Council Creek also suitable
N. Hillsboro / Helvetia / C. Pass	8,600	Make use of interchanges on both sides of 26
East Bethany	2,600	Added connectivity, leveraging of investments

*\*This number is based upon the three County and Metro COO suitability recommendations only, not any kind of region wide land needs analysis. The Washington County land needs analysis presented in the August 3, 2009 staff report to the Reserves Coordinating Committee identified that under a high growth scenario, approximately 67,000 acres would be required to address housing and employment needs in Washington County alone through 2060.*

# CONCLUSION (1 OF 2)

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- ✗ We respectfully request that you recommend:
  - ✗ More overall Urban Reserve acreage in Clackamas County.
  - ✗ More overall Urban Reserve acreage in Multnomah County.
  - ✗ More undesignated lands throughout the region.
  - ✗ Leaving areas around Damascus undesignated, to be revisited at a later date if additional Urban Reserves are needed.
  - ✗ That you avoid placing Urban Reserves in areas where voter driven annexation has the potential to create a moratorium.
  - ✗ That recent historic trends be applied for estimating available capacity and that assumptions regarding potential capacity be less aspirational in nature.



# CONCLUSION (2 OF 2)

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## ✗ Concerns with existing capacity assumptions:

- ✗ How does Metro plan on increasing refill and redevelopment rates by 50% (from 27% to 40%)?
- ✗ How does Metro plan on achieving a 50% increase in mandated densities (from 10 units per acre to 15 units per acre), especially outside of urban core areas?
- ✗ How does Metro anticipate having 71,000 housing units subsidized to the tune of up to \$50,000 per home, and what will the impact be on schools and other public services?
- ✗ How can the region anticipate accommodating 1 million more people in the next 25 years (a 67% increase over current population) and yet plan on needing only 5% more land (15,000 acres) in housing reserves for the next 50 years?
- ✗ If we are indeed “Making the Greatest Place” isn’t it logical to assume that our UGB capture rate might increase? A potential uptick is not factored into the current UGR, and even a slight increase could change our land need requirements dramatically.

# NAIOP

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COMMERCIAL REAL ESTATE  
DEVELOPMENT ASSOCIATION

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OREGON CHAPTER

October 14, 2009

Metro/Reserves Steering Committee – Core Four Members

Kathryn Harrington, Metro Councilor

Charlotte Lehan, Clackamas County Commissioner

Jeff Cogen, Multnomah County Commissioner

Tom Brian, Washington County Chair

600 NE Grand Avenue

Portland, OR 97232-2736

Dear Reserves Steering Committee Core Four Members:

As the Reserves Steering Committee reaches its final recommendations, I wanted to reiterate the contributions, findings and aspirations of the Reserves Business Coalition, of which I've been a part for the past twenty months.

When the Regional Steering Committee was launched, Greg Specht, Craig Brown and I, working with the Portland Business Alliance, assembled a coalition of groups interested and involved in land use policy to support our efforts with the RSC. We've been convening, generally twice monthly, since January 2008. It's been a challenging timeframe, because many of our participants also have been trying to manage through the worst economic downturn of our lives.

Our participating groups include the **Portland Business Alliance, NAIOP, HBA, CREEC, ICSC, the Westside Economic Alliance, the Clackamas County Business Alliance, CAR, PMAR, SIOR and Business Oregon.** We've also reached out to broader set of major employers, land owners, and regional/national associations.

## **How has the Coalition contributed to the Urban and Rural Reserves process?**

- **We began with constraints mapping.** We demonstrated that even within the 404,000-acre reserves study area, there was limited flat, dry land suitable for future employment-oriented development. We particularly identified land proximate to current Title 4 areas, and saw that our future "employment foundation land" was concentrated in Washington County and along the I-5 South corridor. We presented this data to the County reserves committees and to the RSC.
- **We offered a peer review of Metro's infrastructure study,** where we questioned the assumption that infrastructure costs more for development "on the edge" than for infill projects. Our analysis indicated that these costs vary widely project by project and a simple trend does not exist. Certainly there are examples of high-density, infill development that carried high infrastructure costs and ultimately has not been accepted by the market.

- **We sponsored peer reviews of the Urban Growth Reports** and called into question aggressive densification assumptions. The UGRs pertain to the 20-year growth boundary, but their message is being used to influence our reserve decisions: That we can fit a million more residents and a half-million more jobs within our current Urban Growth Boundary, if we assume new, major policy/infrastructure investment choices and expect ever-increasing densities in our neighborhoods and employment areas. We also echo concerns from Washington County jurisdictions that the UGR omits some industrial cluster analysis, including solar industry employment, which impacts land need forecasts and in turn, the need assessment for reserves.

Further, there is an assumption that critical, new employment sites can simply be added as needed through a separate, Metro-led process. This “just in time” concept has been rejected by companies, agencies and groups involved in siting new employers.

- **We supported the economic mapping projects led by Business Oregon, West Side jurisdictions and the Clackamas County Business Alliance**, demonstrating the thousands of new jobs and millions or billions of dollars of payroll and taxes that could be generated from well-selected Urban Reserve areas as those areas are developed over the decades to come. We contrasted that economic output with agricultural productivity data, illustrating the steep economic trade offs we make if well-located employment land is instead designated for rural use.
- **We cautioned the Counties and the RSC of the risk of roping off employment clusters and economic potential** if we propose “tight” Urban Reserves, then surround those urban areas with Rural Reserves, preventing future expansion if employment and population growth exceeds our expectations. Conversely, we argued that providing a more accommodating Urban Reserve supply represents a low-risk insurance policy – if we don’t need all Urban Reserve land, future leaders won’t bring it into the Urban Growth Boundary. Reserves are **not** a growth boundary decision, but future growth **potential** that will be decided by future regional leaders.
- **We communicated our business community aspirations.** Despite the diverse stakeholders in our Coalition and our economic crisis, our aspirations are clear:
  - Support a robust and growing job base for our residents.
  - Leverage our region’s urban planning talent to help provide for that economic growth - and to offset a cycle of viciously high unemployment and fiscal consequences.
  - Ensure that we designate land with the best qualities and locations for future expansion and that we efficiently use our infrastructure to generate economic prosperity, benefiting the entire region.
  - Ensure that our residents have a range of housing choices that they can afford in areas that are close to their employment.
- **And we have advocated for specific Urban Reserves recommendations:**
  - That all areas designated as “unconstrained” in the Coalition/Group Mackenzie mapping series be analyzed as potential Urban Reserves via factor review, as was done in Washington County.
  - Ensure that our reserves designations accommodate the mid- to high-end range of population and employment forecasts.
  - Support the Urban and Rural Reserve recommendations submitted by the Washington County Planning Directors, including potential industrial areas north of Highway 26 along West Union Road and employment land north of Forest Grove and Cornelius.
  - Support Multnomah County’s proposed reserve mapping, with the inclusion of the Urban Reserve area requested by the City of Troutdale.

- Support Clackamas County's proposed urban and rural areas, including the area south of Sherwood, as well as modifications articulated by the CCBA, including designation or expansion of Urban Reserve areas in the I-5 South Corridor, the Stafford Triangle, and the Highway 26 corridor.

**Where is the Coalition now?** Frankly, our business leaders are confused. After two years of work with the RSC and the Counties, we believed that we had collectively reviewed and analyzed the statutory reserve factors and arrived at a set of potential Urban Reserves of about 47,000 acres. Coalition members were concerned that this conclusion itself assumed growth at or below the midpoint of forecasts. But in the past month, we've also received competing analysis from Metro asserting that approximately 21,000 acres of Urban Reserves are sufficient – less than half of our expectation.

**At this time the Coalition does not have any reconciliation of these vastly different findings** and has embarked on a broader outreach effort to communicate our work and recommendations. I believe that the health of our crippled regional economy – ironically one of the Urban Reserve factors – may rely in part on our reaching a reserves answer that we have already found.

**In fact, many on our Coalition now find ourselves looking back at maps of the Portland region 50 years ago** and contemplating what our region would look like physically and economically if we had implemented an overly-restrictive set of reserves in 1959. How would Washington County have grown? What would Tualatin, Rock Creek, or Aloha look like now? Would this region now support one of the world's leading high-tech employment clusters? Could we have imagined the huge process facilities that semiconductor and photovoltaic manufacturing requires? Or the growth in sports apparel companies and their corporate campuses? Or the rise in prosperity and population that followed these industries, in turn supporting so many other local businesses, from restaurants to advertising firms to farmers' markets?

**If you find these questions difficult to answer, then you can imagine what has motivated the Reserves Business Coalition these past two years.**

Thank you again for your support of our efforts to contribute to the reserves process.



Greg Manning,  
Reserves Steering Committee Member - Business

cc: Clackamas County Reserves Citizens Advisory Committee  
Washington County Reserves Coordinating Committee  
Multnomah County Citizens Advisory Committee  
Reserves Steering Committee  
Reserves Business Coalition



Comments of Greg Specht  
Reserves Steering Committee Meeting #19  
October 14, 2009

I want to take my time this afternoon and talk about aspirations, and about what quality of life means to me. I believe all of us in this room aspire to many of the same things; to provide for our families; to raise our children in a safe environment; to make this world, or our corner of it, a better place; to help those who are less fortunate; and to support causes which are important to us. I suggest that in order to achieve our individual aspirations, whatever they may be, it helps for each of us to be financially stable...and for most of us...that means keeping your job if you have one, or getting one if you don't.

Too many times I have heard that quality of life is what we enjoy when we visit a Farmers Market, or what we see on a drive to the beach. To me quality of life also includes having a job...and I will bet you almost all Oregonians would agree with me. Unfortunately too many of our neighbors and friends are today sitting on the sidelines out of work, or are underemployed. I believe the decisions we make in the coming months regarding Urban and Rural Reserves can help prevent a recurrence of the disastrous situation in which we find ourselves today.

Let's talk about how this relates to land use. The primary issue before this committee from the coalition of businesses I represent... in Construction and Real Estate...is ensuring the availability of employment land for future development as part of the Urban Reserve process. We want to go on record that in order to allow for expansion of existing business, and in order to allow the Portland region to compete regionally and nationally in attracting new businesses and their jobs to our area, we must have an adequate supply of large tracts of land, all of which are properly

zoned and serviced, are located adjacent to transportation corridors, and are affordably priced.

Over the past 22 months we have heard from industry representatives and national site selectors regarding the requirements necessary to just be included in the game of attracting new employers to our region. To believe that we can successfully compete if our best options require assembling parcels from multiple property owners, or that “just in time” UGB expansion or “fast tracking” annexation will be acceptable to these employers, simply does not pass the laugh test. If we cannot give a potential employer a list of credible shovel ready site options, along with a realistic timetable for land use approvals and permits, they will simply go elsewhere, to the economic detriment of our region.

Industry clustering is a successful concept, but to succeed, we must have land on which clusters can grow. Large employers also often require excess land they can warehouse for future expansion, and we have many examples of this land use in our region today. To assume that this corporately owned excess land will be available for development by others in future years ...is just not credible.

Let's talk about refill. Metro would have us believe that between now and 2030, just 21 years away, 24% of all existing industrial uses will be torn down and replaced with new employment facilities, and 45% of current non-industrial uses will also be redeveloped. I have been in this business for 35 years and my experience is that very little of this type of refill activity actually occurs outside of the CBD's of the cities within our region. To overstate the refill percentage, as Metro has done, is to understate the need for additional land. This convenient position that Metro has included in its calculations on the refill percentage is not supportable in any competitive marketplace today and must be revised to reflect the reality of the world in which we compete.

Let's talk about risk, what if we get it wrong? If we underestimate the supply of urban land, we will lose existing jobs, or fail to successfully attract new ones. Is that error going to affect any of us in this room? Probably not. But it will certainly affect the employment opportunities for our children and our grandchildren, and their quality of life. Let me put it another way.....what is the risk to us if we designate too much land as urban? My answer...is ...Nothing. If the demand for employment land does not appear, all of us in this room know exactly what will happen to this unneeded Urban land.....nothing, it will remain undeveloped. The risk of under designating is far greater than any risk associated with over designating Urban land as part of this process.

We must be reasonable in how we deal with the so called “hard edges to our urban boundaries, such as Hwy 26 in Washington County, or the Willamette River in Clackamas County. I won't dwell again on what happened to consideration of the land south of the Willamette for employment purposes but I will say that nobody in this room put either I-5 or Hwy 26 where they are. But both freeways serve a vital role in our region as critical transportation corridors and land adjacent to them should be natural sites for designation as employment land. To presume development shouldn't occur north of 26 ignores the obvious fact that it is already there. Further, the region has just spent tens of millions of dollars on improvements to interchanges on the Freeway. To exclude land north of and directly accessible to the Sunset is simply irresponsible.

Some have suggested we adopt a “less is more” philosophy, which will force employers into new architectural forms in the hope of acceptable or improved production outcomes. In the vernacular of Metro, this is known as the “reduced footprint policy objectives” which I think means Metro is hoping something that has never been successfully achieved elsewhere will actually work here....

because if it doesn't...we will have seriously underestimated the land cushion needed for employment purposes in coming years.

The process we are involved in....is not a zero sum game...Rural does not have to lose in order for Urban to win, and vice versa. There is room for everyone to succeed if the right decisions are made by our political leaders in the coming months.

In closing, the business interests I represent acknowledge that trade-offs are going to be made by the Core Four in the coming months outside the view of the public. Because of the highly subjective nature of this effort, and the very real risks associated with getting it wrong, I ask that you error on the side of a larger designation of urban land than proposed by Metro. Have the courage to go south of the Willamette, north of Hwy 26 and south of Hwy 212 in Multnomah County. I want to echo the comments earlier this afternoon of Mayor Knapp representing neighboring cities, and urge you to give both Troutdale and the five western Washington County cities the Urban designations they have requested, so that they can also achieve their local aspirations. If you make these difficult decisions, if you get it right, you will help to insure the economic health of our region for generations to come. Thank you and good luck.





# COALITION FOR A LIVABLE FUTURE

107 SE WASHINGTON STREET, SUITE 239 • PORTLAND, OR 97214  
PHONE: 503.294.2889 • FAX: 503.225.0333 • WWW.CLFUTURE.ORG

October 15, 2009

Metro Council  
600 NE Grand Avenue  
Portland, OR 97232

Dear President Bragdon and Metro Council:

We offer the following comments regarding Metro's *Making the Greatest Place* on behalf of the Coalition for a Livable Future, a partnership of over 100 diverse organizations and hundreds of individuals to promote healthy and sustainable communities. For nearly 15 years CLF has worked to protect, restore and maintain healthy, equitable and sustainable communities, both human and natural, for the benefit of present and future residents of the greater Portland-Vancouver metro area. During this time we have consistently participated in Metro's long range planning processes. In the context of the *Making the Greatest Place* planning, we have served on the Reserves Steering Committee, TPAC, the RTP Workgroup, the HCT Think Tank, and TSMO Workgroup.

We support the three overarching recommendations outlined in Chief Operating Officer Michael Jordan's report released on September 15, 2009 and believe they reflect the values from Region 2040. We appreciate the hard work and thoughtful approach Metro staff brought to this effort.

While the recommendations in the COO report are laudable, we are concerned that the ability to achieve these goals is hampered by lack of accountability and local actions in contravention to the recommendations. We have seen a consistent pattern of discrepancy between Region 2040 aspirations and on-the-ground actions.

For example, Washington County is looking to create huge urban reserves, some of which include the floodplains of the Tualatin River and its tributaries. In addition, the list of projects proposed for the Regional Transportation Plan (RTP) includes many costly major road expansions that are not consistent with the RTP's goals or, for that matter, *Making the Greatest Place*.

Fundamentally, our approach to regional development has always prioritized protecting and restoring ecosystems inside and outside the urban growth boundary, preserving farmland, and building healthy, inclusive and equitable communities. If carried out using a comprehensive, accountable triple bottom line approach, we believe that our concerns can be addressed by responding to the following recommendations:

**1) Make addressing climate change an overarching principle.** The imperative of climate change is too big to limit our response to mitigation through reducing the production of greenhouse gases. The region's response to climate change must also include adaptation. Natural landscapes and the region's urban green infrastructure are essential to respond to predicted increases in winter storm events which

will result in increased stormwater inputs, to increased probability of urban/wildland fires, expansion of floodplains beyond current FEMA 100-year floodplain, and increased threat of landslides, especially in the urban landscape.

Climate change also will have major ramifications for regional (as well as global) water supply. Balance is needed, as some systems, such as Portland's, are underutilized while others are overutilized (e.g., Haag Lake Dam is being raised at great expense). Overutilization affects Total Maximum Daily Loads (TMDLs) and temperature, further exacerbating environmental issues. Fortunately, for now, there is no municipal water shortage; however, regional planning and coordination is needed in the region. Further, water providers need to begin working together (whether through requirement or incentive) and discontinue using sensitive water sources, such as the Clackamas River.

Metro's scenarios analysis completed last fall demonstrated that even under the most ambitious transit scenario, the projects that make up the Regional Transportation Plan (RTP) do not reduce global warming pollution below current levels. The actual project lists submitted for inclusion in the RTP are far behind this ambitious (but still, frankly, inadequate) transit-oriented scenario. Preliminary results from the performance evaluation show that both the federal and state priority lists are *worse* than doing nothing. This means that we will need to make up more lost ground in the next RTP update unless we make major revisions now to begin to meet the imperative of climate change.

## **2) Constrain urban reserves to a size that focuses regional development strategies on communities already in the UGB.**

Once land has been urbanized it is impossible to reverse the impacts to farm, forest and natural resource lands. Metro's Urban Growth Report indicates that under *current zoning* we have enough land to fulfill our needs for the next 50 years if we utilize existing buildable land inside the current UGB more effectively. However, it is also imperative that streams, wetlands, and upland forests be protected and that ample parks, trails and natural areas be provided inside the Urban Growth Boundary. In the past, compact urban form has been promoted at the expense of natural resource protection. A quid pro quo of growing up and not out must be enhanced. For instance, cities and counties must remove height restrictions from their building code (thus demonstrating a commitment to efficient use of land within their existing UGBs) before being allowed to expand into urban reserve areas.

Washington County is proposing 34,000 acres of urban reserves. These are so large they will irreparably damage the future of agriculture in the western part of our metro region and Northwest Oregon, and consume floodplains and other natural landscapes.

Clackamas and Washington counties are in the top 5 agriculture-producing counties in the state. Multnomah County is among the top counties in food processing, which was the only manufacturing sector in Oregon to show positive employment gain in 2008.

Furthermore, the vehicle traffic these areas would generate once urbanized is completely contrary to the goal of an urban form that reduces greenhouse gas pollution.

## **3) Support vibrant centers to simultaneously get the most out of our limited dollars while advancing equity.**

Urbanization of rural land is extraordinarily expensive. Metro and other studies show that the cost of providing sewers, water, roads, and sidewalks to accommodate a growing population on new land at the urban edge is up to *twice* as expensive as accommodating that same growth in the existing urban area, through infill, redevelopment, and making more efficient use of existing infrastructure.

Creating vibrant regional and town centers and compact neighborhoods in already developed areas has multiple benefits: it helps reduce global warming; protects farmland, parks, and natural resources; reduces wasteful spending on public infrastructure; and promotes health and equity.

Many cities are already working on developing vibrant centers by attracting more retail businesses, increasing housing, and obtaining better transit service. Projects exist throughout the region, including transit station areas in Forest Grove, the Beaverton Round, the Lents area, Tigard Triangle, and Milwaukie's downtown and future light rail stations. There are limited public and private dollars to help these areas succeed, and new areas added to the UGB will compete directly with these investments.

Focusing on centers will also advance equity if we simultaneously use tools and resources to ensure a mix of housing types and costs, including affordable units and accessible housing for people with disabilities and equitable distribution of parks, trails and natural areas. Metro's Housing Needs Analysis shows that affordable communities will be in regional and town centers. Affordability of these locations must be a top priority.

**4) Invest heavily in bicycle, walking, and transit, and expanding the bi-state regional pedestrian and bicycle trail network, rather than road building. Connect these to investments in affordable housing, parks and natural areas and ensure they benefit communities with the greatest needs.**

The project lists submitted for the RTP are full of road building projects, most of which will increase driving and greenhouse gases in the future, and lead to other negative health and community impacts that undermine regional goals. The principles promoted in the RTP appropriately call attention to the value of neighborhoods with a regular network of local roads that relieves local traffic from arterial streets and provides safe and convenient connections for bicyclists and pedestrians to public transit, schools and other local destinations. However, the proposed RTP projects seem to be directed at major road expenditures.

Prominent examples of how the proposed RTP project list falls short on many of the Making the Greatest Place goals:

- Washington County and cities are proposing over 100 road widening projects, some up to seven lanes, and over 80 new roads and road extensions.
- Over 80% of Clackamas County's budget is spent on road expansions, including over 60% for projects that widen roads to add vehicle lanes.
- 100% of Happy Valley's proposed budget is for new roads and road widening, with no funds allocated specifically to creating an integrated bicycle and pedestrian network, better functioning of the existing road system, or access to transit.

- The City of Portland and Port of Portland have proposed a new bridge to West Hayden Island, which will lead to additional global warming pollution and destroy one of the largest and most important unprotected natural areas in the region. The Portland City Council recently reaffirmed that the need for this bridge is contingent upon the outcome of the ongoing West Hayden Island Planning Process. We question why a bridge, the need for which is uncertain at this time, remains in the RTP, displacing other important projects.
- And as we have discussed extensively in other contexts, ODOT has already allocated tens of millions to plan the Columbia River Crossing, a multi-billion dollar boondoggle that will lead to many of the problems the region is working to avoid: sprawl development, increased driving, global warming pollution, and poor air quality. It will also create pressure to expand I-5 in other locations, and ODOT has already proposed both at the Rose Quarter and further south on I-5, exacerbating the negative impacts.

These expensive road projects also hinder our ability to make lower cost investments that would more effectively provide transportation choices and meet regional goals. Dozens of bike and pedestrian improvements or smaller transit access projects could be budgeted for funding in place of just one expansion.

Most road building projects should be removed from the RTP and replaced with large investments in bicycle, walking, and transit, and connect them to investments in affordable housing, parks and greenspaces. The only road projects that should remain in the RTP are ones that increase street connectivity, completeness, or efficiency, while integrating green streets measures to the greatest extent possible. These changes would support MGP outcomes for vibrant communities, safe and reliable transportation choices, leadership on climate change; and clean air and water.

In order to achieve this, Metro should create a system to encourage or require jurisdictions to remove outdated projects from lists, allowing more projects that meet regional goals to be included. Metro should build on the evaluation methods used in the MTIP to create a process in the RTP and other MGP decisions that are truly accountable to the outcomes. Furthermore, the RTP should put a premium on making connective transit more competitive with auto travel.

#### **6) Invest in green solutions to water quality, flood reduction, and support healthy ecosystems and watersheds.**

CLF member, Urban Greenspaces Institute, has submitted detailed comments regarding Climate Change and Ecosystem related issues. We support and stand behind these recommendations.

#### **7) Make affordable housing an integral component of Making the Greatest Places**

Some of the big-picture questions that arise around equity include how to avoid the future displacement of low-income and culturally diverse populations as land values continue to increase, and how to prevent the negative impacts when displacement occurs. These issues have arisen both for low-income populations in central city communities and for those living in manufactured homes.

The Coalition for a Livable Future's *Equity Atlas* substantiates that people have been priced out of Portland's urban core and settled into the outer areas of the region. Yet, transportation costs in these



areas are higher now and projected to rise in the future. Without adequate planning for affordable housing, linked to transportation, these communities could languish in increasing isolation, with growing housing and transportation cost burdens.

Metro must assert itself by demanding of jurisdictions combined planning for permanent affordable housing and equitable, affordable transportation choices, particularly in centers and corridors targeted for future development. Jurisdictions that integrate permanent affordability measures in their infill and redevelopment efforts and transportation projects that show linkage to affordable housing should be prioritized. Those projects that do not address affordability should be revised.

We do not support the claim that expanding the UGB is necessary to increase the stock of affordable housing. The Urban Growth Report documents that over 95% of the residential construction permits have gone to areas inside the original 1979 UGB. Furthermore, the Urban Growth Report found that the price of new homes in UGB growth areas has averaged \$100,000 more than inside the preexisting UGB.<sup>1</sup> Metro should require specific levels of affordability as part of the Intergovernmental Agreement establishing urban reserves.

**7) Target technical assistance and other Metro resources to support infill, redevelopment and job creation efforts that are consistent with MGP outcomes in local jurisdictions where these efforts benefit low-income and other historically disadvantaged communities.**

Metro should evaluate where concentrations of low-income and other historically disadvantaged populations are located in the region (where they exceed the region's average) and prioritize support for these jurisdictions. The Nature in the Neighborhood Grant Program is a great example of where Metro is already doing this and should be a model for how Metro allocates other resources where appropriate.

Supporting a strong and diverse workforce is a key aspect of ensuring equity in our regional planning efforts. Metro should expand its minority, women and emerging small business (MWESB) program as well as provide tools and technical assistance to local jurisdictions to support them in expanding workforce diversity. For example, Metro should require all contractors responding to Metro RFPs to explain how they will recruit and consider a diverse workforce for employment. In addition, Metro should establish measurable workforce targets for specific populations as a key element of protecting and creating good jobs for the people who live here now, and those who will come, and provide tools to help jurisdictions achieve the targets

**8) Convene key players to develop new revenue and investment strategies**

Stimulating investment to realize the Making the Greatest Place plan is a critical element of our success. We urge you to identify new opportunities for revenue sharing, possibly at a more localized scale than the entire region, and incubate the appropriate partnerships to pilot this important strategy for advancing equity while also realizing other MGP goals. Additionally, we urge you to explore new financing and investment mechanisms and strategies, including the possibility of an infrastructure initiative, to help finance full realization of MGP and the 2040 vision.

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<sup>1</sup> Median sale price of new construction was \$262,000 in areas within the UGB in 1997, and \$367,500 in Post-1997 UGB Expansion Areas. Draft Urban Growth Report (released September 15, 2009), page 112.

**9) Develop strong accountability mechanisms with consequences as well as rewards.**

Metro has struggled to ensure that its local jurisdiction partners demonstrate how the projects and plans they propose help actualize Region 2040. Possible mechanisms include performance measurement tracked through an annual audit, or use of criteria to evaluate projects, like those used in the Nature in the Neighborhoods Capital Grants Program and the Metropolitan Transportation Improvement Program. Furthermore, Metro should facilitate an agreement between jurisdiction partners to encourage adaptive management.

Metro should also strengthen accountability and adaptability by establishing key committees that align with the six Making the Greatest Places goals and the soon-to-be-established performance based outcomes. Leaders that make up MPAC, JPACT, and their associated technical advisory committees cannot be charged with policing themselves.

For example, Metro should re-establish a natural resource committee that provides advice from natural resource professionals. Formerly, the Water Resources Advisory Committee and Greenspaces Policy Advisory Committee provided such advice to Metro Council and staff. Metro should bring federal, state and private representatives with expertise in natural resource issues together to form a formal advisory committee. Similarly, Metro should establish equity, climate change, and economic vitality committees.

Metro has historically maintained a strong focus on the “place-based” elements of a creating a “sustainable and prosperous” region—primarily through a geographic and jurisdictional lens. As we have discussed throughout this document, we strongly recommend that Metro bring that same level of focus, prioritization, and capacity to issues concerning historically disadvantaged populations regardless of their location within the region—meaning that low income individuals, people with disabilities, culturally specific communities, seniors, and other groups. are considered and have equal footing as the jurisdictions within which they live.

The Coalition for a Livable Future wishes to be a full partner with Metro, local jurisdictions, and metro area residents to ensure the upcoming decisions result in a healthy, prosperous region now and in the future. We urge you to take the next big step forward toward realizing 2040 and strengthening the region’s work together to achieve this vision.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is for Ron Carley, and the signature on the right is for Jill Fuglister. Both signatures are fluid and cursive.

Ron Carley and Jill Fuglister  
Co-Directors, Coalition for a Livable Future

Cc: Reserves Steering Committee  
JPACT  
MPAC  
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