

Chris Billington
Clerk of the Council

Cheryl Grant
Support Staff

***Addendum/Attachments**

A copy of the originals of the following documents can be found filed with the Permanent Records of this meeting, in the Metro Council Office.

Document Number	Document Name	Document Date
111296-01	The Honorable Gordon Faber, Mayor City of Hillsboro 123 West Main St. Hillsboro, OR 97123	11/12/96
111296-02	Doug Draper, General Manager Genstar Land Company Northwest 11515 SW Durham, E-9 Tigard, OR 97224	11/12/96
111296-03	Scott and Pam Van Raden 21122 NW Old Pass Rd Hillsboro, OR 97124	11/12/96
111296-04	The Honorable Ralph Brown, Mayor City of Cornelius 1355 N. Barlow St PO Box 607 Cornelius, OR 97113	11/12/96
111296-05	Beverly Stewart 21949 NW West Union Rd Hillsboro, OR 97124	11/12/96
111296-06	Rodney Adams Adams, DeBast, Helzer, McFarland Richardson and Uffelman Attorneys at Law 4500 SW Hall Blvd. Beaverton, OR 97005	11/12/96
111296-07	Jim Emerson 13900 NW. Old Germantown Rd Portland, OR 97231	11/12/96

Mayor Gordon Faber
SUMMARY COMMENTS FOR 11/12/96 LISTENING POST
(Glencoe High School)

(These Remarks Summarize My Written Comments
To the Metro Council.)

Overall Comment:

- Of The 5 Urban Reserve Sites Hillsboro Initially Requested, Our Top Priorities Are:
 - (1) The Southern 200 Acres Of Site No. 62; and,
 - (2) Sites Nos. 54 and 55 (aka “Sisters of St. Mary’s Property”).
- The 2 Sites Are Needed To Help Hillsboro Become An **“Independent and Self-Contained 2040 Community”** Pursuant To Metro’s RUGGOs and 2040 Growth Concept.

Priority Site: 200-Acre Southern Portion of Site No. 62:

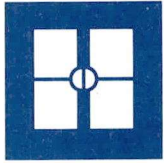
- These 200 Acres Are Only 29% of the Original 692-Acres In Site 62. This Scale-Back Balances Goal 9 Economic Development Objectives With Protecting EFU Lands.
- A Ranking Of the 200 Acres In “Industrial” Use Against Factors 3 - 7 of the Urban Reserve Rule Yields A 55.0 Score, Exceeding the Executive Officer’s 49.5 For Acceptable Urban Reserve Sites. His 39.5 Score For Site 62 Is Inapplicable Because It’s Based on “Residential”, Not “Industrial” Use.

- 200-Acre Site Is Supported By The “Special Land Needs” Provision of the Urban Reserves Rule: It’s Inclusion Will Implement State Planning Goal 9 (Economic Development) By Addressing the State & Regional Shortage of Large Sites for Campus Industrial Enterprises. There’s Only 1 Such Site Remaining (Seaport Property).

Sisters of St. Mary’s Property (Site Nos. 54 and 55).

- This Site Also Falls Under the “Special Land Needs” Provision Of the State Urban Reserve Rule: It’s Needed As Urban Reserves To Correct Hillsboro’s Current and Projected “Jobs Rich” and “Housing Poor” Imbalance. It Can Support 5,216 Additional Homes To Support Hillsboro’s Regional Industrial/Employment Center (Approx. 100,000 Jobs by 2017).

CITY OF HILLSBORO



November 12, 1996

Hon. Jon Kvistad, Presiding Officer
and Members
Metro Council
600 NE Grand
Portland, OR 97232-2736

RE: Priority Urban Reserves Areas Requested By City of Hillsboro - Sisters of St. Mary Property (Site No. 55); and Shute/Evergreen Road Industrial Areas (200-Acre Portion of Site No. 62 Located at the Corner of Shute & Evergreen Roads, Hillsboro).

Dear Metro Councilors:

Thank you for this final opportunity to ask you to include the above-captioned areas as Metro Urban Reserves. Map of these areas are enclosed.

In prior testimony to the Metro Council dated September 12th and October 7th, we asked you to designate these two sites as Urban Reserves. These letters are part of your record of these proceedings. In these final comments, we restate the key reasons why these sites should be Urban Reserves and also provide new technical information that support their inclusion as Urban Reserves.

Overall Comment.

Our comments on these priority Urban Reserve sites share a fundamental theme: Both sites are needed to help Hillsboro create a City in the future that is marked by the types of "independent and self-contained 2040 communities" envisioned by the adopted Metro RUGGOs and 2040 Growth Concept. In making this request we simply ask you, as you select the Urban Reserves, to remain true to the commitment Metro already made to achieve this fundamental element of your adopted RUGGOs and 2040 Growth Concept.

Southern Portion (200 Acres) of Site No. 62.

In our October 7th testimony, we asked Metro Councilors to recognize that a number of public safety as well as economic development policies (summarized below) support industrial rather than residential development and use of this site. If your Council concurs, then, the Executive Officer's Urban Reserve Ranking (39.5 total score) of this site also should change since it was premised on this site being an Outer (Residential) Neighborhood. The attached technical memorandum re-ranks the site accordingly, applying the same eleven (11) Urban Reserve Rule Factors applied by the Executive Officer to Site No. 62. The result is a total score for the 200-acre site of 55.0, well above his 49.5 threshold score for recommended Urban Reserve sites, providing an independent ground for Metro Council inclusion of this site as Urban Reserve.

Alternatively, inclusion of the 200-acre parcel as Urban Reserves would qualify under the "Special Land Needs" exception of the State Urban Reserve Rule by implementing the Statewide Planning Goal 9 directive to local governments to "provide at least an adequate supply of sites of suitable sizes, types and locations, and service levels for a variety of industrial and commercial uses consistent with plan policies. The State and Region have a shortage of available large-lot campus industrial sites. This site will help fill that void and immediately improve the State's and Region's ability to compete nationally and internationally for highly specialized high tech industrial enterprises. Hillsboro's industrial sanctuary contains only one uncommitted site large enough to meet the needs of a large campus industrial enterprises.

The following public safety and community development policy concerns support designating this site as Urban Reserve:

- Because this site is on the flight approach path of the Hillsboro Airport crosswind runway and is impacted by the flight pattern of a proposed third parallel runway, industrial use of the site is recommended by the Port of Portland and the City for public safety reasons.
- Adding the site to the Urban Reserves would give Hillsboro additional flexibility with existing land use designations north of the Sunset Highway. The northern portion of Site No. 62 and Site No. 64 are split by the "Seaport" industrial property which has rolling topography and is more suitable for residential development. Including the southern part of Site No. 62 as Urban Reserves would allow moving the Seaport property's industrial designation to that area. Residential use of the Seaport property would allow the relocation of Hillsboro's existing fourth high school site from its current industrial location to the Seaport site. Hillsboro High School District could not find an appropriate new high school site within the UGB. Converting the Seaport property to residential would allow the City to work with the School District to resolve this problem.

Finally, converting the Seaport property to residential use would create the opportunity for a large-scale, master planned residential community, that includes the Seaport property, in close proximity to one of the largest concentrations of employment in the Region.

- The intersection of Shute and Evergreen Roads present a potentially congested intersection that can be avoided by including the subject site eventually in the UGB. The 200-acre parcel would allow internal streets within the parcel that would vent traffic away from the intersection by providing alternative routes between Hillsboro and the Sunset Highway.
- Adequate adjacent public infrastructure (sewers, water, utilities, roads) is available to support its industrial development/use.
- The site abuts urban land and industrial uses along its east and south boundaries and existing Exception Lands along its west boundary and to the north, along an unnamed McKay Creek tributary. Thus, it is surrounded by non-resource lands that either contain, or will be developed soon with urban uses.

Site No. 55: Sisters of St. Mary Property.

The need to include Site No. 55 as Urban Reserves exists because a poor jobs-to-housing ratio exists in Hillsboro due to the successful development of regional employment center uses here over time in furtherance of State and Regional economic development policy priorities. The very real prospect that the City will achieve its Functional Plan 2015 allocation of 14,812 new homes by 2002 (2004 at the latest), further exacerbates our "housing poor" and "jobs rich" imbalance over the long term and supports the inclusion of Site No. 55 under a "Special Land Needs" provision of the State Urban Reserve Rule. A detailed description of how that provision would be met by including Site No. 55 as Urban Reserves is contained in the enclosed technical memorandum.

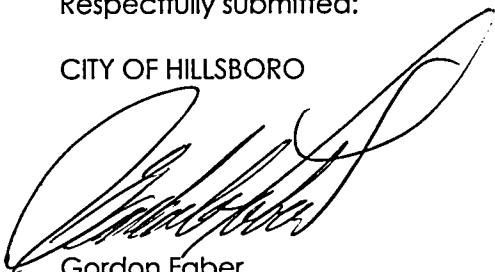
The Metro Staff has concluded that Site No. 55 (883 acres, of which 476.3 acres are EFU lands and 406.6 acres are "Exception Lands" under the State Urban Reserve Rule) would be Inner Residential Neighborhood (45.1%) and Outer Residential Neighborhood (54.9%) and would support 5,216 homes and 2,046 jobs whenever it is brought into the UGB. It is appropriate for Urban Reserve designation under the "Special Lands Needs" provision for other reasons as well:

Site No. 55 is large enough to provide 5,216 housing units towards achieving and maintaining an jobs/housing ratio in Hillsboro that will help to reduce vehicle miles traveled by Hillsboro residents and employees who work here. Only half of the site contains EFU lands; the other half already being "Exception Lands" under the State Urban Reserve Rule which have top priority among all types of lands when establishing Urban Reserves. It is closer to the Downtown Regional Center than all the other proposed Urban Reserve Sites that abut the City (and is larger than all of them). Therefore, it has the best potential among all the proposed Urban Reserve sites near Hillsboro for bringing needed housing closer to the jobs in a "jobs rich" Hillsboro, and for reducing vehicle miles traveled to/from/through Hillsboro.

Notwithstanding that half of it is EFU lands, Site 55 received high rankings by the Executive Officer in terms of Urban Reserve Factor 3 Criteria concerning Utility Feasibility (4 points of a possible 5 points); Schools proximity (5 of a possible 5 points); and, the highest rankings (9 points in each category) for the Urban Reserve Factor 4 Criteria concerning Fewest Site Development Limitations and Largest Amount of Buildable Lands Within the Site among all Urban Reserve Sites throughout the Region.

Respectfully submitted:

CITY OF HILLSBORO









Gordon Faber
Mayor

encl:

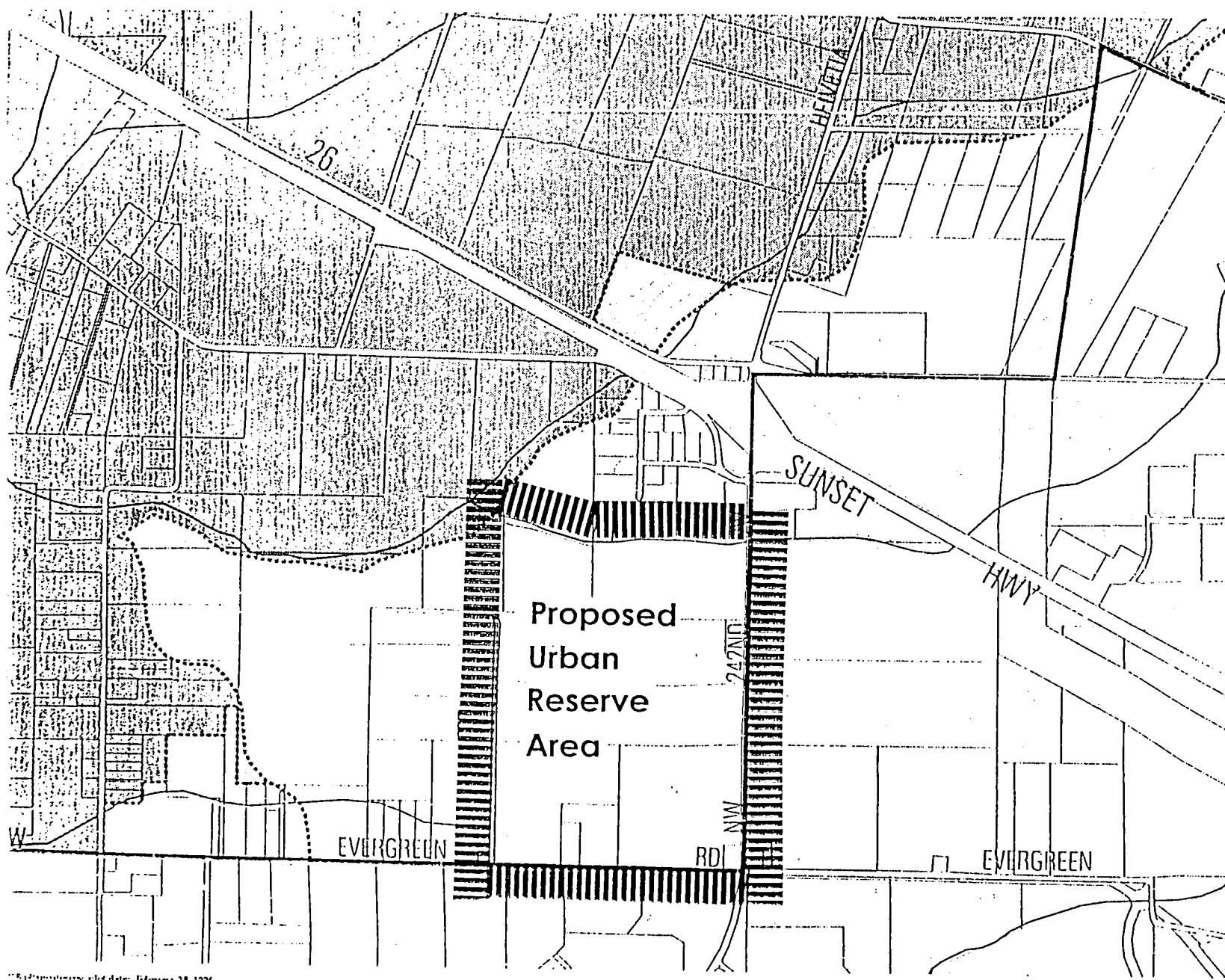
Urban Reserve Study Areas

Adopted By
Metro Council 2-5-96

-  This Map's URSA
-  UGB
-  Other URSA's
-  Outside UGB and URSA's
-  Specific Study Area
-  Urban Growth Boundary

MAP #62

Acres EFU Acres
692.20 589,624









600 E. Grand Ave
Portland, OR 97211-2754
(503) 792-1712



Map prepared by: pld date: February 28, 1996

Urban Reserve Study Areas

Adopted By
Metro Council 2-8-96

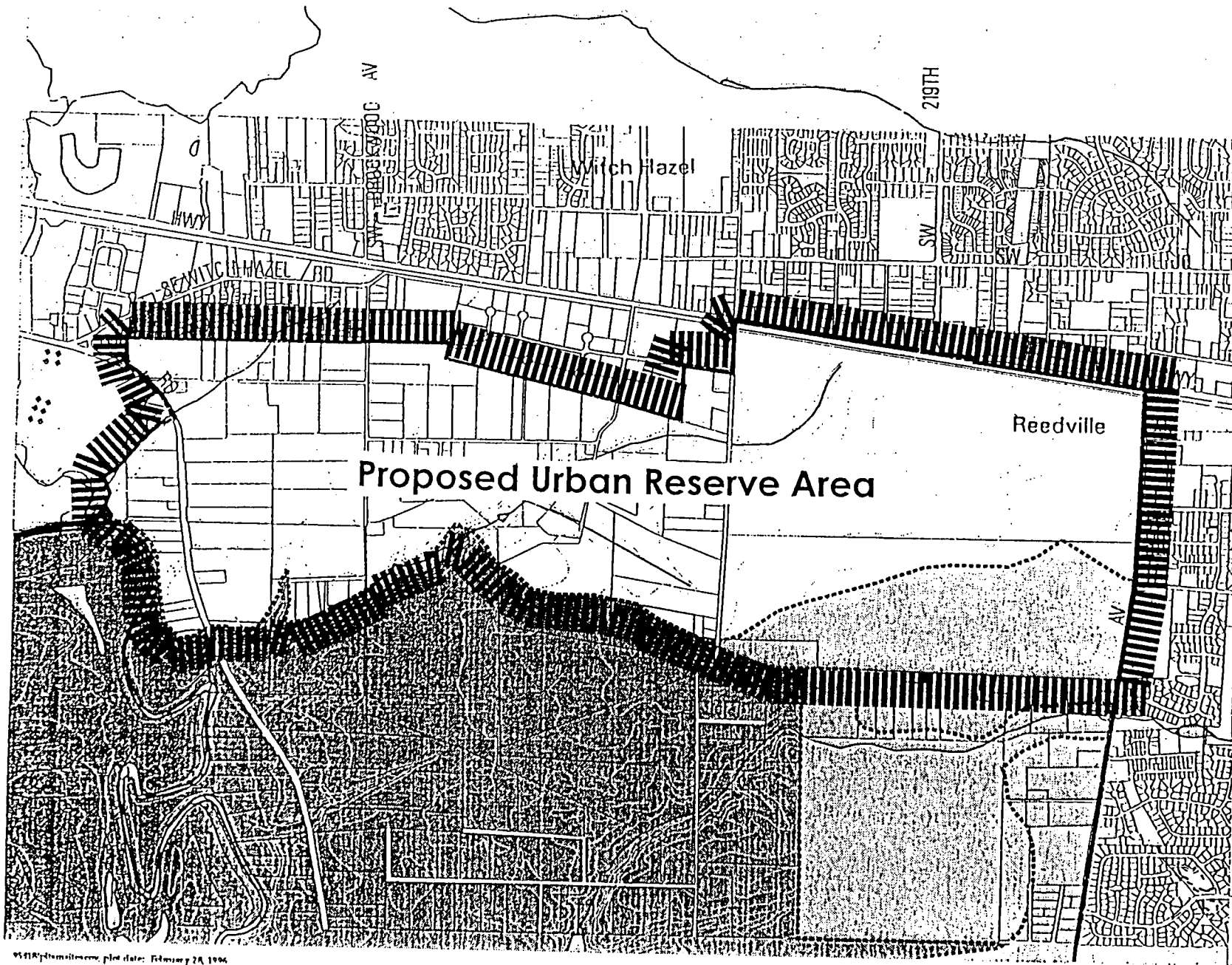
-  This Map's URSA
-  UGB
-  Other URSA's
-  Outside UGB and URSA's
-  Specific Study Area
-  Urban Growth Boundary

MAP #55

Acres	EFU Acres
882.90	476.297



400 NE Grand Ave
Portland, OR 97232-3736
(503) 797-1942



Proposed Urban Reserve Area

95418-plumville.mxd, plot date: February 28, 1996



November 8, 1996

MEMORANDUM

TO: Mayor Gordon Faber and City Council
FROM: Planning Department

RE: **Analysis of Hillsboro's Priority Urban Reserves Sites: Site No. 55 ("Sisters of St. Mary Property") and Southern Portion of Site No. 62 ("Shute/Evergreen Roads Site").**

This memorandum discusses whether each of the above-captioned priority Urban Reserve Sites to Hillsboro may be so designated by the Metro Council under the State Urban Reserve Rule. The memorandum contains (1) an evaluation of the Shute/Evergreen Roads Site if it were developed as an Industrial area (rather than a residential "Outer Neighborhood" area as assumed by the Metro Executive Officer when he ranked this site on September 3rd), applying the State Urban Reserves Rule; and, (2) an analysis of whether the Sisters of St. Mary Property satisfies the "Special Lands Needs" provisions of the State Urban Reserve Rule and, thus, should be designated as Urban Reserve.

I. Site No. 62 (200-Acre Portion At Shute & Evergreen Roads, Hillsboro).

As originally designated by Metro, Site #62 contains 692 acres; 590 EFU acres, and is split by US Highway 26. The ***Metro Background Data Report, Exhibit "A" (Sept. 1996)*** contains Metro's review of Site 62 against the State Urban Reserve Criteria (Factors 3 through 7, OAR 660-04-010). The Report identifies the Site as "Outer (Residential) Neighborhood" containing 409 buildable acres and capacities for 4,089 dwelling units and 1,677 employees. Applying the State Urban Reserves Rule, the Metro Executive Officer ranked original Site 62 is ranked as follows:

U/R Factor 3:	Executive Officer Ranking Scores
* Utility Feasibility	3.5
* Road Network	2.5
* Traffic Congestion	5.0
* Schools	1.5
U/R Factor 4:	
* Efficiency Factor	7.0
* Buildable Factor	6.0
U/R Factor 5:	
* Environmental Constraints	3.0
* Access to Centers	1.5
* Jobs/Housing Balance - Jobs Rich	1.5
* Jobs/Housing Balance - Housing Rich	0.0
U/R Factor 6:	
* Agricultural Retention	4.0
U/R Factor 7:	
* Agricultural Compatibility	<u>4.0</u>
Total Score:	39.5

Threshold Issue: Appropriate Metro Designation of Site 62.

Hillsboro informed the Metro Council that only a 200-acre portion of Site No. 62 located at the corner of Shute and Evergreen Roads comprises one of Hillsboro's two top priority sites for Urban Reserve designation. (See attached Maps of the two priority sites for Hillsboro.) This 200-acre portion is not appropriate for residential use and, thus, for the "Outer Neighborhood" designation due to its close proximity to Hillsboro Airport runways and to developing surrounding industrial uses¹. "Industrial" designation of the 200-acre parcel is far more appropriate. (There is only one large lot campus industrial site left in the Hillsboro regional employment center right now.) If the Metro Council concurs with this assessment, then, the ranking of the 200-acre parcel should be premised on its development for campus Industrial (high tech) use, rather than as an Outer Residential Neighborhood.

As described below, when the State Urban Reserves Rule (Factors 3 - 7) are applied only to the 200-acre portion of Site No. 62 based on its development as a campus Industrial, the parcel earns a score that exceeds the minimum 49.5 ranking recommended by the Executive Officer for Urban Reserve designations:

U/R Factor 3 Application:

Utility Feasibility:

The public cost of providing utility services (water, sanitary sewers stormwater drainage) to the 200-Acre site is minimal. Most of it would be on-site utility costs since connections to existing infrastructure near the parcel can be made right now. On-site infrastructure costs would strictly

¹ The Port of Portland recommends that the subject, 200-acre portion of Site 62 be designated for Industrial, rather than Residential uses in its Hillsboro Airport Compatibility Study (1992).

be private, not public costs. Therefore, the 200-acre parcel should receive a high score under this Factor 3 category. If the original 692 acres of Site 62 can be awarded a 3.5 score by the Executive Officer, then, a 5.0 score to the 200-acre portion of Site 62 would be reasonable because these acres are closest to, and most easily served by the available public infrastructure systems.

Road Network:

Metro's "road network" ranking (2.5 points) of Site 62 was premised on its use for housing. The ranking reflects the extent to which Site 62 has a supporting local streets network and how well that network satisfies a street connectivity standard of 14 north/south and 14 east/west local streets per mile.

Campus industrial use of the 200-acre parcel requires considerably less land for both local streets and street connectivity. In fact, such industrial development of the parcel would probably involve developing it as a single parcel with few internal through-streets. These streets would provide access to/from/through the industrial campus and enable internal pedestrian travel. Accordingly, the "2.5" score of the 200-acre parcel should be raised because only a minimal internal road network would be needed to support its industrial use (in contrast to a more extensive network needed to support its use for homes). A "5.0" score, rather than the 2.5 assigned by the Executive Officer, is reasonable.

Traffic Congestion.

This Factor 3 criterion focuses on the potential contribution to traffic congestion from residential and employment traffic generated from Site No. 62 onto the highways and arterials that serve the site. Metro 2015 housing and employment forecasts applicable to Site No. 62 were used to predict such traffic congestion. Metro concluded that traffic congestion generated from the original Site No. 62 (409 buildable acres containing 4,089 dwelling units and 1,677 employees by 2015) could be absorbed by the existing surrounding roadway network. This led to a high score for original Site 62.

The 200-acre parcel would contain only employees if designated for Industrial (rather than Outer Neighborhood) use. Applying the average density of 20 employees/acre (per the Metro *Urban Growth Management Functional Plan*) a maximum of 4,000 employees may be accommodated in a campus industrial development of the parcel. The number of daily peak hour trips generated by 4,000 employees on the 200-acre parcel would be far less than the trips generated from 4,089 homes and 1,677 employees within the original Site No. 62. For these reasons a higher score than the "5.0" score awarded by the Executive Officer would be reasonable.

Schools.

This Factor 3 criterion looks at site accessibility to public schools. Original Site 62 is ranked low indicating significant distances between the site and existing or proposed school sites. This low score is not valid for (and would penalize) the subject, 200-acre portion of Site 62 because it is suitable only for industrial use. Because campus industrial use of the parcel would not generate any additional school enrollment, it should have a very high score under this criterion. It would be reasonable to give the parcel the same score as the highest ranking Urban Reserve sites under this criterion: a "5.0" score.

Urban Reserve Factor 4:

Efficiency Factor.

This Factor 4 criterion focuses on physical development limitations within a site (ie., slopes, small size, and other development limitations). The original Site 62 (409 buildable, vacant acres out of a total 692 acres) was given a high score (7.0). A much higher score should be given to the subject, 200-acre parcel. Unlike original Site 62, the parcel is flat and has no known physiographic features limiting its development. It is buffered by Exception Lands to the north and west, and urban lands and uses to the south (Intel) and east (Ohka) within the Urban Growth Boundary. Accordingly, the 200-acre parcel should at least have the same score as the highest ranking Urban Reserve Sites in the Region under this criterion; a "9.0" score.

Buildable Land.

This Factor 4 criterion looks at the amount of "buildable" acres within a site. Higher scores are given to sites that have a greater percentage of their net land areas available for development after deducting 25% of the gross acres within the sites for future streets, schools, parks, churches, fraternal organizations and other publicly owned lands.

The 25% gross-to-net deduction may be applicable to "Outer Neighborhoods", but clearly should not apply to Industrial Sites. It is Hillsboro's experience that campus industrial sites allocate no more than 10-15% of their land area for internal streets and public facility uses. Applying this formula to the subject, 200-acre parcel, its current "6.0" score logically should increase, and should at least be the same as the highest score given any Urban Reserve site in the Region by the Executive Officer; an "8.0" score.

Urban Reserve Factor 5.

Environmental Constraints.

This Factor 5 criterion looks at the extent of environmental constraints to site development posed by the presence of steep slopes, flood prone soils, wetlands, and riparian corridors, or hazardous or sensitive environmental resources.

While the original Site No. 62 contains some such environmental constraints, the subject, 200-acre parcel is outside of the 100-year floodplain (*FEMA Flood Insurance Rate Map*) adjoining an unnamed McKay Creek tributary just north of the parcel. The *National Wetlands Inventory, Hillsboro Oregon Quadrant* shows no wetlands within the 200-acre parcel. The parcel is east (and outside) of an existing Water Area/Fish & Wildlife Habitat shown on the *Washington County Natural Resource & Rural Plan*. There are no known environmental hazards and sensitive environmental resources within the 200-acre parcel. Therefore, the 200-acre parcel should be ranked higher than the 3.0 score given to the original Site 62. It should have the same "4.0" score as other Urban Reserve sites in the Region that do not have environmental constraints.

Access To Centers.

Access-to-centers concerns the distance of sites from regional or town centers in Hillsboro measured along public roadways. It gives points to a site based on its "accessibility" to these centers. The closer a site is to such a center, the greater number of points it gets. A site accessible to more than one center receives additional points. A site located within six miles of a regional center, and 3 miles of a town center is considered "accessible". One (1) point is

assigned to a site located six miles from the regional center, 2 points/5 miles, 3 points/4 miles and so on. The same formula applies to town centers.

If traveling along public rights-of-ways, the subject, 200-acre parcel is located within 2.5 miles from the Tanasbourne Town Center (1 point); within 2 miles from the Orenco Town Center (2 points); and, within 5 miles from the Downtown Hillsboro Regional Center (2 points). Applying this criterion, the 200-acre parcel should be assigned a ranking of 3.0 rather than 1.5.

Jobs/Housing Balance.

The *Metro Background Data Report, Exhibit "A"* states that a balance of jobs and housing on a sub-regional basis is one way to reduce vehicle miles traveled in the Region as called for in Metro's RUGGOs. The Report forecasts a jobs/housing ratio of 1.47 jobs for every housing unit in Hillsboro by 2015 (compared to a 1.12 jobs for every housing unit in 1994). It states that only the Hillsboro and Portland market areas are not "jobs poor" sub-regions.

If the 200-acre parcel is developed for Industrial, rather than residential use, and contains about 4,000 new jobs by year 2015, it should help keep jobs/housing ratio in Hillsboro close to 1.47 jobs/housing unit. Recent Metro Jobs/Housing Balance Case Studies (1994) concluded that a jobs/housing ratio of 1.5 jobs for every housing unit is effective in reducing vehicle miles traveled.

The Executive Officer gave original Site No. 62 (including the 200-acre parcel) a low (1.3) "jobs rich" score on the premise that it would be a residential "Outer Neighborhood" site. However, it should be a "jobs rich" site because it is next to a growing regional employment center in Hillsboro. (The parcel was given a "0.0" score as a "housing rich" site.) A higher score should be given to the 200-acre parcel should it be developed for Industrial use; ie. at least a "3.0" score. By definition, industrial use of the site would make it a "jobs rich" site.

Urban Reserve Factor 6: Agriculture Retention.

The Executive Officer's 4.0 ranking of Site No. 62 (including the subject, 200-acre parcel) is reasonable since the site is predominately comprised of EFU lands.

Urban Reserve Factor 7: Agricultural Compatibility.

The Executive Officer's "4.0" ranking of the Site is reasonable since intermittent as well as year-round farming are dominant activities in areas north and west of the subject, 200-acre parcel.

Based on the foregoing analysis, the ranking of the 200-acre parcel should be revised accordingly:

U/R Factor 3:	Executive Officer Ranking Scores	Revised Ranking Scores
* Utility Feasibility	3.5	5.0
* Road Network	2.5	5.0
* Traffic Congestion	5.0	5.0
* Schools	1.5	5.0
U/R Factor 4:		
* Efficiency Factor	7.0	9.0
* Buildable Factor	6.0	8.0
U/R Factor 5:		
* Environmental Constraints	3.0	4.0
* Access to Centers	1.5	3.0
* Jobs/Housing Balance - Jobs Rich	1.5	3.0
* Jobs/Housing Balance - Housing Rich	0.0	0.0
U/R Factor 6:		
* Agricultural Retention	4.0	4.0
U/R Factor 7:		
* Agricultural Compatibility	<u>4.0</u>	<u>4.0</u>
Total Score:	39.5	55.0

200-Parcel Implements Statewide Planning Goal 9.

Alternatively, inclusion of the 200-acre parcel as Urban Reserves would qualify under the "Special Land Needs" exception of the State Urban Reserve Rule by implementing the Statewide Planning Goal 9 directive to local governments to "provide at least an adequate supply of sites of suitable sizes, types and locations, and service levels for a variety of industrial and commercial uses consistent with plan policies. The State and Region have a shortage of available large-lot campus industrial sites. This site will help fill that void and immediately improve the State's and Region's ability to compete nationally and internationally for highly specialized high tech industrial enterprises. Hillsboro's industrial sanctuary contains only one uncommitted site large enough to meet the needs of a large campus industrial enterprises.

II. Sisters of St. Mary Property (Site No. 55)

According to the ***Metro Background Data Report, Exhibit "A"***, Site No. 55 has a total of 883 acres of land directly south of the Tualatin Valley Highway. It can be split for analysis purposes into an eastern half consisting of two large tax lots that comprise the "Sisters of St. Mary Property" containing 476.3 acres of EFU land. The western half contains approximately 406.6 acres of "Exception Lands" under the State Urban Reserve Rule. It is comprised mostly of separately-owned individual tax lots ranging in size from 1/2 acre to 20 acres. The Report states that 45.1% of the buildable acres in the Site would be Inner Neighborhoods, while 54.9% would be Outer Neighborhoods, and the site has a capacity for 5,216 dwelling unit and 2,046 employees.

Applying the State Urban Reserve Rule to Site No. 55, the Metro Executive Officer gave it a final "42.0" ranking. The site did not reach the Executive Officer's "49.5" ranking threshold. However, Site No. 55 may still be included in Urban Reserves if a need for the site under the "Special Land

Needs' provision of the Rule (OAR 66-21-030(4)(a)) can be established. As recently-amended, this provision states:

(4) Land of lower priority under section (3) of this rule may be included if land of higher priority is found to be inadequate to accommodate the amount of land estimated in section (1) of this rule for one or more of the following reasons:

a. Specific types of identified land needs, including the need to meet favorable ratios of jobs to housing for areas of at least 100,000 population, served by one or more regional centers designated in the Regional Goals and Objectives for the Portland Metropolitan Service Area, or in a comprehensive plan for areas outside the Portland Metropolitan Service Area.

The *Metro Background Data Report, Exhibit "A"* describes Hillsboro as "jobs rich" but "housing poor". The Report states that by 2015 Hillsboro will attain a ratio of 1.47 jobs for every dwelling unit and forecasts approximately 75,479 jobs and 51,429 households in Hillsboro by 2015.

At 2.13 persons/household, 51,429 households translate into 109,543 residents. Added to the 75,479 people working in Hillsboro each day by 2015, the City's total daily population by 2015 will be about 127,000 people who would be served primarily by the Downtown Hillsboro Regional Center. Therefore, in compliance with 660-21-030(4)(a), Hillsboro would qualify by 2015 as an area in which the 660-21-030(4)(a) "Special Land Needs" exception may apply², if such a need can be established.

Title 1 of the *Urban Growth Management Functional Plan* requires Hillsboro to be able to absorb at least 14,812 additional dwelling units and 58,247 additional jobs by 2015 through its comprehensive plan and implementing ordinances. ***Based on a 2000 units/year housing construction pace, Hillsboro will achieve the 14,812 additional dwellings by the year 2002 (through infill, redevelopment and the construction of the various 2040 mixed uses designated in Hillsboro). In order to achieve and maintain the 1.47 jobs/housing ratio described for Hillsboro by the Metro Background Data Report, Exhibit "A" after year 2002, additional land for housing near Hillsboro will need to be set aside as Urban Reserves pursuant to the "Special Land Needs" Exception. Site No. 55 is needed as Urban Reserves for this reason.***

Site No. 55 is large enough to provide 5,216 housing units towards achieving and maintaining the 1.47 jobs/housing ratio in Hillsboro during the years after 2002 but before 2015. Only half of the site contains EFU lands; the other half already being "Exception Lands" under the State Urban Reserve Rule³, which have top priority among all types of lands when establishing Urban Reserves. It is closer to the Downtown Regional Center than all the other proposed Urban Reserve Sites that abut the City (and is larger than all of them). Therefore, it has the best potential among all the proposed Urban Reserve sites near Hillsboro for bringing needed housing closer to the jobs in a "jobs rich" Hillsboro, and for reducing vehicle miles traveled to/from/through Hillsboro.

Notwithstanding that half of it is EFU lands, Site 55 received high rankings by the Executive Officer in terms of Urban Reserve Factor 3 Criteria concerning Utility Feasibility (4 points of a possible 5 points); Schools proximity (5 of a possible 5 points); and, the highest rankings (9 points in each

² Pursuant to HB 2709, land within the UGB must include at least a 20-year supply of developable land. Under the Urban Reserve Rule (660-21-030(1)), Urban Reserve Areas within the Metro Region shall include "an amount of land estimated to be at least a 10-year supply, and no more than a 30-year supply of developable land beyond the (20-year) time frame used to establish the urban growth boundary (land supply)."

³ OAR 660-21-030(1) states that "Exception Lands" are to be given first priority among the types of resource and nonresource lands that may be included in Urban Reserves.

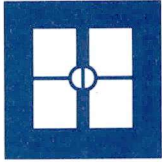
category) for the Urban Reserve Factor 4 Criteria concerning Fewest Site Development Limitations and Largest Amount of Buildable Lands Within the Site among all Urban Reserve Sites throughout the Region. Finally, it is buffered from agricultural lands to the south and west by a new golf course currently under construction.

CITY OF HILLSBORO PLANNING DEPARTMENT

A handwritten signature in black ink, appearing to read "Patrick A. Ribellia". The signature is written in a cursive, flowing style with a large initial "P".

Patrick A. Ribellia, AICP, Esq.
Senior Planner
attach:

CITY OF HILLSBORO



November 12, 1996

Hon. Jon Kvistad, Presiding Officer
and Members
Metro Council
600 NE Grand
Portland, OR 97232-2736

RE: Butternut Creek Property, Urban Reserve Study Area Site No. 53.

Dear Metro Councilors:

At the request of the owners and proponents of this site, we reviewed its characteristics and the documents offered in support of its inclusion as Urban Reserves. We believe that its eventual development for residential use can contribute significantly to easing our projected need for more housing in Hillsboro in order to maintain an effective jobs-to-housing ratio here and, thereby, reduce vehicle miles traveled by our residents and people who work here. There are many other valid reasons presented in the October 31st letter from the Site's representative to Metro that support its inclusion in Urban Reserves.

We strongly support the inclusion of Site No. 53 as an Urban Reserve with the following caveat. The inclusion of the Sisters of St. Mary Property (Site No. 55) and a 200-acre southern portion of Site No. 62 situated at Shute and Evergreen Roads remains our top priority Urban Reserve Sites.

Sincerely,

CITY OF HILLSBORO

A handwritten signature in blue ink, appearing to read "Gordon Faber", written over the printed name.

Gordon Faber
Mayor

November 12, 1996

Susan McLain , Deputy Presiding Officer
Metro Council, District 4

Dear Ms McLain:

We understand that you are having a meeting tonight at Glencoe High School to discuss planning issues for future growth in Washington County. We have attached a proposal to discuss about future planning for the area called West Union which is around the interchange of West Union and Cornelius Pass Roads and located in Study Area 64. This is an historic community in existence since 1851 (recognized by Washington County) which appears to have ignored in the planning process. I do not believe that is your intent.

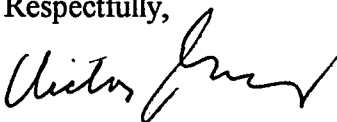
We moved to West Union in 1979 when we purchased a 16+ acre farm at what is now known as 6995 NW Cornelius Pass Road. At the time we moved here we had almost all the services we would ever need close by- a grocery store, a gas, oil, and car repair facility, a feed store which repaired small machinery, a beauty parlor, and a small restaurant called "Larry's". This historic crossroads and trade center has lost value to its residents as business after business has closed. We currently have only a smaller grocery and a beauty parlor. To get our car's gas or oil changed, we now have to go into downtown Hillsboro. Any further development to West Union is limited because of lack of proper zoning (existing businesses are "grandfathered in").

Since 1979 we have operated our farm which includes a five acre filbert orchard. The filbert orchard, which was in late prime when we acquired the property, has grown old and declined in productivity. We have considered replanting the filbert trees but when the "urban reserve areas" were being discussed several years ago, we hesitated to invest in trees that would not produce an initial crop for seven or eight years, was subject to "filbert blight", and might necessitate selling because of eventual rezoning, and thus higher property taxes.

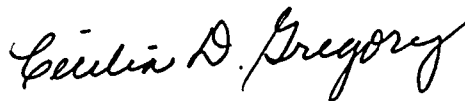
For several years we have waited with our neighbors to learn of any changes in zoning and in the "Urban Growth Boundary". As we've waited, we have watched our community lose its' services so that the community itself is wasting away. We are fast becoming a neighborhood of strangers.

We need two things. First, we would like Metro to carefully consider the attached modest proposal for a shopping village to restore our West Union community. Second, a change of zoning of the area is needed so that the existing shopping area receives a legitimate status.

Respectfully,



Victor Gregory



Cecilia Gregory

Attachment

PROPOSAL FOR DEVELOPMENT OF CURRENT COMMERCIAL SERVICES* AND ADJOINING AREAS @ WEST UNION/CORNELIUS PASS ROADS INTERCHANGE BORDERING HILLSBORO CITY LIMITS (URBAN GROWTH BOUNDARY ON NORTH) INTO A VILLAGE CENTER & MIXED USE AREA**

PROPOSAL:

- 1. TO EXPAND THE WEST UNION/CORNELIUS PASS AREA, INCLUDING THE EXISTING SHOPPING CENTER* INTO A VILLAGE CENTER** & MIXED USE AREA**
- 2. TO INCLUDE THIS AREA WHICH IS PART OF STUDY AREA 64 IN THE URBAN GROWTH BOUNDARY**

The following support such development:

- THIS PARCEL HAS SUPPORTED MIXED USE INCLUDING COMMERCIAL SERVICES FOR 50+ YEARS
- EXISTING MIXED USE AREA ALREADY EXISTS, HAS POTENTIAL FOR COMPREHENSIVE PLANNING TO EXPAND MIXED USE IN AREA
- WATER, SEWERS & NATURAL GAS ARE CURRENTLY AVAILABLE AT INTERSECTION
- BUS SERVICE AVAILABLE TO CORNER OF WEST UNION & CORNELIUS PASS RDS
- EASY ACCESS FROM CORNELIUS PASS, WEST UNION, BENDEMEER & JACOBSON RD
- ***CURRENTLY PROVIDES SERVICES FOR MUCH OF THE AREA NORTH & SOUTH OF WEST UNION RD INCLUDING PHILLIPS, GERMANTOWN, OLD & NEW CORNELIUS PASS, JACOBSON, CROEN, SKYLINE LOGIE TRAIL, HELVETIA, JACKSON QUARRY,, DICK & ROCK CREEK RDS
- ***CLOSE TO DEVELOPED & UNDEVELOPED INDUSTRIAL & COMMERCIAL AREA BETWEEN CORNELIUS PASS, WEST UNION, HELVETIA RDS & SUNSET HIGHWAY
- ***WALKING/BIKING DISTANCE FOR MUCH OF ROCK CREEK DEVELOPMENT (CLOSER THAN TANASBOURNE MALL) & MULTIPLE OTHER NEARBY HOUSING AREAS
- MAJOR TRANSPORTATION CORRIDOR ON CORNELIUS PASS ROAD, TRANSPORTATION CORRIDOR ON WEST UNION (ODOT REPORTED 15,000 VEHICLES PER DAY ON CORNELIUS PASS ROAD IN 1992)
- MULTIPLE UNUSED RAILROAD TRACKS IN THE AREA SUPPORT METRO'S "TRACKS TO TRAILS" PROGRAM
- CLOSE SERVICE AREA FOR PROPOSED LAND RESERVED FOR NEW HIGH SCHOOL

* "GRANDFATHERED IN"

** SUPPORTED BY CPO 7 AT 1995 MEETING

*** THE TANASBOURNE MALL DEVELOPMENT IS NOT AN EASY OPTION FOR SHOPPING BECAUSE (1) DISTANCE IS ALMOST 5 MILES FROM THE CORNELIUS PASS -WEST UNION INTERCHANGE (2) TANASBOURNE HAS A FRAGMENTED ARRANGEMENT WHICH NECESSITATES DRIVING FROM STORE TO STORE AND CROSSING EVERGREEN, 185TH, WALKER RD AND OTHER SMALL STREETS BECAUSE OF THE "STRIP MALL" CONCEPT OF TANASBOURNE'S DEVELOPMENT (3) THE NATURE OF TANASBOURNE'S DEVELOPMENT IS "UNMALL-LIKE" AND MAKES SHOPPING DIFFICULT BECAUSE DISTANCES BETWEEN BUSINESS OFTEN NECESSITATES CROSSING MORE THAN ONE STREET; STREETS WHICH HAVE LONG AND UNCOORDINATED TRAFFIC LIGHTS (WASTING GASOLINE AND INCREASING POLLUTION)

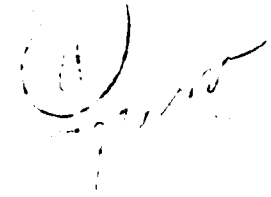
SERVICES THAT COULD BE SUCCESSFULLY DEVELOPED IN PART OF STUDY AREA 64 INCLUDE

- SHUTTLE TO PLANNED LIGHT RAIL (WITH PARKING AVAILABLE FOR COMMUTERS AT SHUTTLE SITE)
- GASOLINE STATION (PRESENT UNTIL 5 YEARS AGO; NO GASOLINE AVAILABLE BETWEEN HILLSBORO AND SCAPOOSE OR INDUSTRIAL AREA (BOTH ON US 30))
- SMALL RESTAURANT/ COFFEE SHOP (PRESENT UNTIL 5 YEARS AGO; OREGON APPLE CO. IS NOT A FULL SERVICE RESTAURANT)
- FARM & EQUIPMENT REPAIR SHOP (PRESENT UNTIL 10 YEARS AGO)
- DRY CLEANERS (WITH POSSIBLE WASHER/DRYER COMPONENT)
- DAY CARE FACILITY
- BANKING SERVICES (POSSIBLY THROUGH USE OF ATM)
- PATH FOR WALKING/RUNNING AROUND PERIMETER OF THE SHOPPING AREA WITH EXERCISE & RESTING POINTS
- BIKE PATH (BOTH CORNELIUS PASS & WEST UNION ROADS ARE FAVORITES FOR BIKING GROUPS IN GOOD WEATHER)
- ROOM FOR FARMERS' MARKET IN SUMMERTIME
- MEETING ROOM FOR CIVIC ORGANIZATIONS SUCH AS AA, VARIOUS SOCIETIES, EDUCATIONAL ACTIVITIES THROUGH CONTINUING ED, ETC
- SMALL EXERCISE FACILITY
- BUSINESS CENTER
- MAIL CENTER (LIKE MAIL BOXES)
- COUNTY LIBRARY PICK UP & DROP OFF CENTER (THROUGH DROP BOX FOR BOOKS ALREADY LOANED WITH OPERATION 4 HOUR/ WEEK FOR PICKUP OF ORDERS)
- SMALL HARDWARE (COULD BE PART OF GROCERY STORE)
- PHARMACY (COULD EXPAND GROCERY STORE PHARMACEUTICALS SECTION)
- VIDEO RENTAL STORE (ONE CLOSED RECENTLY)
- ADDED HOUSING BORDERING INDUSTRIAL AREA TO THE NORTH

SOME SERVICES THAT CURRENTLY EXIST IN OR NEAR STUDY AREA 64 ARE:

- LIMITED BUS SERVICE THROUGH TRI-MET WHICH NEEDS EXPANSION
- GROCERY STORE (COULD BENEFIT FROM EXPANSION AND LATER CLOSING TIME)
- BEAUTY PARLOR •
- REAL ESTATE OFFICE
- FLORAL ARRANGEMENTS ARE AVAILABLE AT OREGON SWEET APPLE CO.
- GARDEN AND VEGETABLE STORE @ OREGON SWEET APPLE CO.
- EXPRESSO COFFEE & SNACK BAR AVAILABLE @ OREGON SWEET APPLE CO.
- CONSTRUCTION CO.

An orderly, mixed use, multipurpose, and quality development of the West Union area, harmonious with the existing natural areas and current services, would be a benefit to the community.



Including St. Mary's (Site 55 and a portion of Site 54) in Metro's Urban Reserve

Testimony before Metro Council – Hillsboro listening post November 12, 1996

I am Doug Draper, general manager of Genstar Land Company Northwest. I appear here today in support of including the 460-acre St. Mary's property near Hillsboro in Metro's urban reserve.

I will deal with three questions in my testimony today:

- *Where is additional housing needed within the region?*
- *What land is best positioned to meet this need, while helping to avoid urban sprawl and reducing vehicle miles travelled?*
- *Can a case be made for reserving this well-situated land, even if it is farmland, under Metro's urban growth objectives and the state's urban reserve rule?*

Where is additional housing needed?

The City of Hillsboro is one of the fastest growing areas in our metropolitan region. Data updated to 1996 indicates Hillsboro has:

- Approved development of 5.7 million square feet of industrial and commercial building space in the last 26 months.
- Issued 2,000 building permits for new single-family and multifamily dwelling units in each of the last two years – and expects to equal that level again this year. At this rate of build-out, Hillsboro will reach its 2017 Functional Plan target in 5.4 years.
- Estimated it will have 58,000 jobs by 2017. Hillsboro now has 41,000 jobs. State economists project the high technology industry, which is centered in Washington County in and around Hillsboro, will add 15,000 new jobs by 2001. That doesn't count jobs created in secondary industry that supplies goods and services to high tech firms.

GENSTAR

Bringing land to life

More housing will be needed in Hillsboro to accommodate the workers and families in expanding industry. If that housing doesn't exist – or isn't affordable – people will be forced to live elsewhere and commute to Hillsboro, adding to traffic congestion and increasing vehicle miles travelled within the region.

As the City has graphically shown, it is running out of room and won't have land particularly for new single-family homes. The urban reserve recommendation before you provides for virtually no additional land in Hillsboro to accommodate housing in the next 50 years. We submit respectfully that is unrealistic and untenable.

What land is best positioned to meet this need?

We suggest that the St. Mary's property – which is flat, large, easy to develop, capable of being masterplanned into a 2040 community, efficient to serve with urban utilities and accessible to public transportation – is one of the best-situated sites to meet this pressing need for additional housing in Hillsboro, if not the entire region.

There simply aren't any 460-acre tracts of flat, undeveloped land, under a single ownership, adjacent to sewer and water lines, along a major transportation corridor with existing urban-level transit service, located anywhere in the region.

In addition, St. Mary's is next to a major computer chip manufacturing facility and industrial park and is connected by 219th/216th to the heart of the Silicon Forest where much of the industrial expansion in Hillsboro is occurring. Located along Tualatin Valley Highway, St. Mary's is connected to regional centers in Beaverton and Hillsboro with car, bus and bicycle access. It also is connected by an arterial to the town center at 185th and Farmington Road.

Smart growth opportunity

St. Mary's is not only well-situated; it is also well-positioned to meet our urban growth containment and community livability objectives.

- Because St. Mary's is large, it can be masterplanned as a 2040 community to provide for a well-designed mix of uses, including a range of single-family and multi-family housing options. It also can accommodate more than 4,000 dwelling units.

GENSTAR

Bringing land to life

- Because the site is flat and relatively easy and efficient to develop, St. Mary's offers the potential for including more affordable housing units. Unlike light rail transit station areas where land prices have skyrocketed, our basic cost structure is more conducive to building a range of housing, including affordable units.
- Because St. Mary's is served by existing public transportation (Line 57, which Tri-Met says is one of its most productive, well-used bus routes), the site can be designed without undue space for large garages and wide streets because people who live there can avoid owning a second or third car.
- Because we have the luxury of masterplanning a community, we can design that community with a school and greenspace at its center.

These advantages translate into a smart growth opportunity for our region. We can put housing close to existing and new jobs, giving people options other than driving their car all the way across town. We can create a community within a community with a school and park areas within walking distance. We can create a true 2040 community.

These are goals and values that Genstar is committed to and is experienced in turning into realities on the ground.

Can the case be made to add St. Mary's to the urban reserve?

The answer is **yes**.

A more definitive examination of the legal issues regarding the urban reserve rule is attached. Let me summarize the case:

- The urban reserve rule requires a jurisdiction to identify lands suitable for urban expansion, then evaluate those lands according to the five factors included in the rule. There is no legal requirement to treat the factors in any particular way, nor to subordinate some of the factors under one factor.
- Under Metro's adopted and acknowledged RUGGOs, you have flexibility to consider location and situational factors in making a set of smart growth decisions.

GENSTAR

Bringing land to life

- There is a **special need** for land to accommodate additional housing in close proximity to existing and future jobs and accessible with non-auto transportation alternatives to reduce long commutes and VMT.
- St. Mary's is virtually **surrounded by urban uses**. It is literally bounded on three sides by the existing urban growth boundary. Much of the land immediately to the south of St. Mary's has been parcelized into small - acreage home sites. A new gold course under construction is located to the southwest of the site. St. Mary's is not connected to any farming corridor or to other farming uses. The nearest farmland is a defunct nursery.
- Under House 2709, St. Mary's would be subject to a **school site analysis** if added to the urban growth boundary. In anticipation of that, we already have met with Hillsboro school officials and offered to include a site for one, and perhaps two, schools in our 2040 community masterplan. In turn, Hillsboro School District has formally requested Metro place our sites in urban reserve.
- We have discussed **transportation planning opportunities** with Hillsboro, Washington County, the Oregon Department of Transportation and Tri-Met. We have agreed to work with state and local officials on a potential extension of 219th south, connecting with 209th. We also have agreed to work with Tri-Met to take fullest advantage of transit-oriented development opportunities on this site.
- We have **committed to masterplanning** the St. Mary's site in collaboration with Hillsboro and Metro.

We believe the need exists to add St. Mary's to the urban reserve to help meet the growing demand for housing nearby rapidly expanding industry. We believe St. Mary's affords one of the best opportunities in the entire region to incorporate well-designed housing units with schools, transportation and greenspaces. We believe urban uses surrounding St. Mary's will compromise the ability to continue to farm this parcel. We believe it is unrealistic to expect we won't need St. Mary's for urban use in the next 50 years. We believe St. Mary's represents a great chance to show what smart growth can accomplish. We believe there is no legal impediment to including St. Mary's in Metro's urban reserve. Therefore, **we ask that St. Mary's be added to the urban reserve.**

GENSTAR

Bringing land to life

The Site

- 463 acres of flat, undeveloped land
- Bordered by Urban Growth Boundary on three sides
- Extends along Tualatin Valley Highway from 209th to 229th near Hillsboro
- Sites 54 & 55 rated by KCM as the 6th and 7th best study area sites for utility, water and sewer line compatibility
- Owned by Sisters of St. Mary's; under option by Genstar Land Company Northwest

The Surroundings

- To the east, a large semiconductor manufacturing facility, fire and rescue station and several multifamily dwellings; to the north, a major transportation artery connecting Beaverton and Hillsboro; to the west, an industrial center and new golf course; and, to the south, parcelized home sites from 3 to 10 acres
- Close to existing and expanding employment centers in Hillsboro and Sunset Corridor
- Served by Tri-Met's Line 57 (one of the most productive routes in the entire region)
- Next door to Intel's Aloha campus which is undergoing \$705 million industrial expansion

The Potential as a 2040 Community

- Mixedused, master-planned community
- High-density housing, including affordable units
- Transit-oriented commercial and residential development
- Centrally located school requested by Hillsboro School District
- Neighborhood design that includes open spaces, bikeways and walkways
- Genstar Land Company Northwest is a subsidiary of Genstar which has experience in developing large masterplanned communities which are called for in the Region 2040 plan

**O'DONNELL RAMIS CREW
CORRIGAN & BACHRACH**

ATTORNEYS AT LAW
1727 N.W. Hoyt Street
Portland, Oregon 97209

TELEPHONE: (503) 222-4402
FAX: (503) 243-2944

DATE: October 8, 1996

TO: Metro Growth Management Committee

FROM: Jeff H. Bachrach on behalf of Sisters of St. Mary and Genstar Land Company Northwest

RE: Legal Basis for Urban Reserve Designation

Urban Reserve Proposal: A 460 acre site in the southwest quadrant of T.V. Highway and 209th Avenue. The site is within the eastern portion of Metro URSA 55 and the northern portion of URSA 54.

Proponents: Sisters of St. Mary (property owner), Genstar Land Company Northwest (proposed developer), and the City of Hillsboro.¹

Surrounding Uses: The existing UGB borders the site on the north, east and a portion of the west. Exception lands and small-lot homesites form the rest of the site's western and southern borders. There are no active farm uses in the immediate vicinity.

LEGAL ANALYSIS

The St. Mary site can be designated as urban reserve consistent with the legal requirements of OAR 660-21-030 (the "urban reserve rule") and the state and Metro policies that are supposed to guide the Metro Council's deliberations. The approach outlined in this memorandum implements the urban reserve rule and the relevant policies more thoroughly than does the computer modeling approach used by the Executive Officer to make his recommendations.²

¹ Hillsboro has stated that it believes all of the areas it previously proposed as urban reserves should be so designated. It has further stated that the Sisters of St. Mary property is one of its two top priority sites. The city believes that it is logical to include the remainder of URSA 55 as part of the urban reserve encompassing the St. Mary property.

² This memorandum and the supporting evidence are directed toward justifying the designation of the St. Mary property, standing alone, as urban reserve. The Sisters of St. Mary and Genstar have no objection to Hillsboro's position, as stated above, that it is logical (although not legally required) to include all of URSA 55 as urban reserve along with the St. Mary property.

O'DONNILLI, RAMIS CREW
CORRIGAN & BACHIRACH

Memo re: Legal Basis for Urban Reserve Designation
October 8, 1996
Page 2

1. Executive Officer's Approach.

The Executive Officer's recommendations are based on a formulaic system staff developed to analyze the five Goal 14 factors and then come up with a score for each of the 72 URSAs. As might be expected, because staff was reviewing approximately 23,000 acres containing hundreds of parcels of land scattered throughout the three counties, the standardized analysis used for every site was both superficial and rigid. It lacked the flexibility to take into account the different circumstances, land needs and updated data for the various subareas throughout the region.

Moreover, as staff was conducting its analysis, it discouraged property owners from submitting site specific information. As a result, the evidence the proponents will be submitting to support the St. Mary site is far more accurate, up-to-date, and subarea specific than the evidence relied upon by the Executive Officer.

In addition to the inadequacy of the evidence, there are a number of other legal flaws or gaps in the mechanistic approach to the Goal 14 factors used by the Executive Officer. A further and perhaps most serious flaw was his failure to apply the second part of the urban reserve rule, which requires Metro to prioritize those sites found to be suitable based on the Goal 14 analysis. He did not analyze whether any sites zoned for farm or forest uses should nonetheless be urban reserves because they qualify under the "special needs" exception or one of the other two exceptions to the priority ranking. The Executive Officer conceded that he skipped over the analysis called for in the second part of the urban reserve rule.

When the various legal, policy and evidentiary gaps in the Executive Officer's analysis are filled in, there emerges a compelling case, as a matter of policy and law, for including the St. Mary property as urban reserve.

2. Goal 14 Suitability Factors.

Factors 3-7 of Goal 14 are intended to address whether a particular site is well-suited to transition from rural to urban status. Summarized below are some of the problems with the Executive Officer's suitability analysis, and evidence about the St. Mary's site and Hillsboro's land needs that was not considered by the Executive Officer.

O'DONNELL, RAMIS CREW
CORRIGAN & BACHRACH

Memo re: **Legal Basis for Urban Reserve Designation**
October 8, 1996
Page 3

a. **Improper balancing.** The Executive Officer gave equal weight to each of the five Goal 14 factors. Neither the urban reserve rule nor Goal 14 calls for such a rigid application. Indeed, such an application seems contrary to the intent of Goal 14; the various factors are typically viewed and applied as interrelated policy considerations that decisionmakers are expected to weigh and balance, not simply plug into a mathematical calculation.

For example, Factor 3 is traditionally considered one of the higher priority factors. It concerns the orderly and economic provision of public facilities and services. The Executive Officer analyzed the issue based on four subfactors: utility feasibility (which encompassed water, sanitary and storm water); existing road network; traffic congestion and capacity; and, school facilities. Based on the Executive Officer's scoring system, those four subfactors, taken together, are given roughly the same weight as a site's soil composition.

b. **Overemphasizing farmland protection.** Staff developed 11 factors and subfactors for its analysis of the Goal 14 suitability criteria. The Executive Officer chose as a matter of policy, not law, to weigh the scoring system so that the two factors (soil type and the presence of active farm uses in the vicinity) dealing with the preservation of farmland were accorded 40% of the points. When the Metro Council makes its determination as to which URSA's are most suitable for urban development, it will be within its policy and legal discretion to assign higher priorities to different factors.

c. **No explanation or evidence.** The background data staff released to explain its formula and scoring system provide very little evidence or explanation as to why a study area was given a certain score on a particular factor. Some examples of where the score assigned to St. Mary's property is either contrary to the evidence or else fails to recognize specific site attributes are noted below:

- ◀ Factor 4 of Goal 14 seeks to achieve maximum efficiency of land uses within and on the edge of the UGB; it is traditionally a factor that is afforded high priority. The essential consideration is how much density can be achieved. The evidence shows that greater overall density, as well as density per net developable acre, can be achieved on the St. Mary property than on any other URSA in Washington County, and probably in the entire region as well. Yet staff gave the site a relatively low score on this important factor.

**O'DONNELL RAMIS CREW
CORRIGAN & BACHRACH**

**Memo re: Legal Basis for Urban Reserve Designation
October 8, 1996
Page 4**

- ◀ Staff gave the St. Mary property a low score on Factor 7, which asks whether development of the site would be compatible "with nearby agricultural activities." The property should receive a top score on this factor because it is well-buffered from the nearest active farm use. The property is bordered on two sides (north and east) and a portion of a third side (west) by the existing UGB. The remainder of the site is bordered by exception land and other highly parcelized non-farm sites. Beyond those sites is a golf course and a large overgrown, inactive nursery. There are no existing or potential "nearby agricultural activities" with which urban development on the property would conflict.
- ◀ A low score was given to the site based on staff's "road network" subfactor. Since the site is next to a principle regional arterial (T.V. Highway) and a north-south arterial (Cornelius Pass/219th), the low score was presumably based on the absence of a local road network. Because of the size of the St. Mary's property, and because it will be developed by one owner as a master-planned community, the developer will have to build, at its cost, the local road network necessary to serve the project and the surrounding vicinity. Thus, in terms of the efficiency and affordability of providing an adequate road network, which is what Goal 14 is seeking to determine, the St. Mary site should receive a high score.

d. The missing factors. The Executive Officer failed to consider a number of factors that are part of the Goal 14 suitability analysis. When these missing factors are added to the analysis, the suitability of the St. Mary property for urban development becomes clear. Some of the factors not considered include:

- ◀ Goal 14 Planning Guideline A.2 states: "The size of the parcels ... converted to urban land should be of adequate dimensions so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels." The size, topography, and accessibility to urban services and uses, plus the fact that it is controlled by a single owner, makes St. Mary's a uniquely well-suited urban reserve site in contrast to virtually every other west side URSA.

O'DONNELL RAMIS CREW
CORRIGAN & BACHRACH

Memo re: Legal Basis for Urban Reserve Designation
October 8, 1996
Page 5

- ◀ Goal 14 also is intended to ensure the "availability of sufficient land for the various uses to ensure choices in the marketplace." Again, because of the site's large size and easily developed topography, the estimated 4,000 housing units that can be developed will include a variety of housing types and price ranges.
- ◀ Compatibility with adjacent uses is another Goal 14 consideration (*see*, OAR 660-04-010(1)(c)(B)) that the Executive Officer ignored, but which provides further support for the St. Mary property. Development of the site would not only be compatible with adjacent urban uses, it would enhance the public and private investment in those existing uses. Those uses include the Rock Creek sewer treatment facility, the bus line along T.V. Highway, the Tualatin Valley Fire and Rescue station and administrative offices and Intel's Aloha facility.
- ◀ The Executive Officer's scoring system afforded little or no points for factors that focus on creating the "independent and self-contained 2040 communities" envisioned by the RUGGOs and 2040 Growth Concept. Integral to that goal is achieving a better balance between jobs and housing so as to limit interregional commutes and lower VMTs. The importance of jobs and housing in assessing the suitability of sites for the urban reserve designation is expressly called for in RUGGO 22.3.2, yet that objective is never cited by the Executive Officer. A mixed-use master-planned community on the St. Mary property, within walking and bike distance of both a major employer and transit line, would be supportive of and implement those policies.

3. Special Needs Exception.

As a matter of policy and law, under Goal 14 and related standards, the St. Mary property can qualify as suitable for the urban reserve designation. The next step in the analysis required by the urban reserve rule is to determine whether the property, despite its EFU zoning, can qualify as urban reserve under the "special needs" exception to the rule's priority ranking, which puts a lower priority on sites with EFU and other resource designations. Metro has emphasized the importance of reviewing the lower priority sites under the exception criteria by

O'DONNELL, RAMIS CREW
CORRIGAN & BACHRACH

Memo re: Legal Basis for Urban Reserve Designation
October 8, 1996
Page 6

adopting RUGGO 22.3.2, which provides: "Lands of lower priority in the LCDC rule priorities may be included in urban reserves if specific types of land needs cannot be reasonably accommodated on higher priority lands ... such as land needed to bring jobs and housing into closer proximity to each other."

In making his recommendations, the Executive Officer ignored that RUGGO and the policy it is intended to implement. Without providing any supporting analysis or evidence, the Executive Officer stated that "there clearly are many reasonable alternatives to the use of protected farm and forest land. Therefore, the Executive Officer is recommending only those lands that are defined as 'first priority' in the State's Urban Reserve Rule."

In rejecting Hillsboro's request that a number of sites around the city, including EFU land, be included as urban reserves, the Executive Officer simply stated, again, with no evidentiary support, that there is sufficient developable land in Washington County inside the UGB. To the contrary, the data submitted by the city shows an inadequate land supply and a compelling need for more urbanizable land. Housing and job growth during the past two years has far outstripped Metro's 1994 projections. The city has one of the largest and most successful industrial and employment centers in the region. A commensurate supply of residential land is needed to balance the city's strong industrial growth and projected demand. Achieving a geographic balance between jobs and housing in the Hillsboro area is the kind of special need that was anticipated by RUGGO 22.3.2.

Reducing VMTs is a primary planning goal of the RUGGOs, as well as of the state Transportation Planning Rule. Urban reserve sites capable of accommodating sufficient residential development in close enough proximity to Hillsboro to create a balance with the city's existing and projected job growth is a "specific type of identified land need" that could justify designating EFU land as urban reserve. There are no exception lands anywhere in the vicinity of greater Hillsboro that can reasonably accommodate the city's long term housing needs. More than any other URSA, the St. Mary property provides the opportunity to address Hillsboro's particular land needs with a development that can achieve so many of the 2040 Growth Concepts.

In response to the Executive Officer's recommendations, the proponents (including Hillsboro) have submitted ample evidence to justify designating the St. Mary property as urban reserve, pursuant to the exception for resource sites in the urban reserve rule (OAR 660-21-030(4)(a)) and RUGGO 22.3.2.

O'DONNELL, RAMIS CREW
CORRIGAN & BACHRACH

Memo re: Legal Basis for Urban Reserve Designation
October 8, 1996
Page 7

4. Conclusion.

This memorandum has been submitted to the Growth Management Committee to provide a legal framework for its consideration of the testimony and supporting evidence provided by the proponents. The complete package will hopefully persuade the committee members that there is a sound evidentiary, policy and legal basis for including the St. Mary property as urban reserve. Indeed, in light of the proponents' submission, excluding the St. Mary site from the urban reserves would not stand as a legally sustainable decision based on the Executive Officer's justification.

JHB/kvw
Jhb\geotax\Metro.M01

11-12-96

DEAR COUNCIL MEMBERS,

HAVING GROWN UP AND ATTENDED SCHOOL IN THE WEST UNION AREA I FEEL COMPELLED TO TELL YOU WHY WE SHOULD BE INCLUDED IN THE UGB RESERVE AREA.

THE WEST UNION COMMUNITY HAS CONTINUED ITS STRONG SUPPORT OF THE AREA GRADE SCHOOL AND GROCERY STORE THAT ARE BOTH PART OF OUR SMALL HAMLET. FOR US TO LOSE THE ABILITY TO BE A UNIFIED COMMUNITY WOULD BE MORE THAN A SHAME. IT WOULD BE A CRIME.

THE ONLY WAY THAT WE CAN MAINTAIN THAT SENCE OF COMMUNITY IS FOR US TO EMBRACE THE USE OF SOME OF OUR LAND INTO A COMMUNITY TOWN CENTER. IT IS A BATTLE TO DRIVE TO TANASBORNE OR HILLSBORO FOR FUEL OR TO GET PHOTOS DEVELOPED. THOSE SERVICES AND OTHERS COULD BE ADDRESSED BY A MULTI-USE TOWN CENTER.

RECOGNIZING THE EXECUTIVE DIRECTOR HAS CALCULATED OUR COMBINED SCORE BELOW THE CUT-OFF POINT, PLEASE CONSIDER DROPPING THE MAJORITY OF PRIME AGRICULTURAL LAND FROM AREA 64, AS SHOWN ON THE ATTACHED MAP. THIS WOULD RETAIN THOSE IMPORTANT ACRES OF FARM LAND AND IMPROVE OUR OVERALL SCORE ABOVE THE CUT-OFF POINT.

I BELIEVE THE CITY OF HILLSBORO WOULD WELCOME OUR COMMUNITY WITHIN ITS INCORPORATION ZONE AND WE WOULD HAVE A CHANCE TO KEEP THE UNIQUE FLAVOR OF WEST UNION ALIVE IN THE FACE OF THE CHANGES AROUND US.

THANK YOU FOR YOUR CONSIDERATION.







SINCERELY,

503-531-0600 WK
645-2683 HOME

SCOTT & PATTI VAN RADEN
21122 NW OLD PASS RD.
HILLSBORO OR 97124

Urban Reserve Study Areas

Adopted By
Metro Council 2-8-96

-  This Map's URSA
-  UCD
-  Other URSA's
-  Outside UGI and URSA's
-  Specific Study Area
-  Urban Growth Boundary

MAP #64

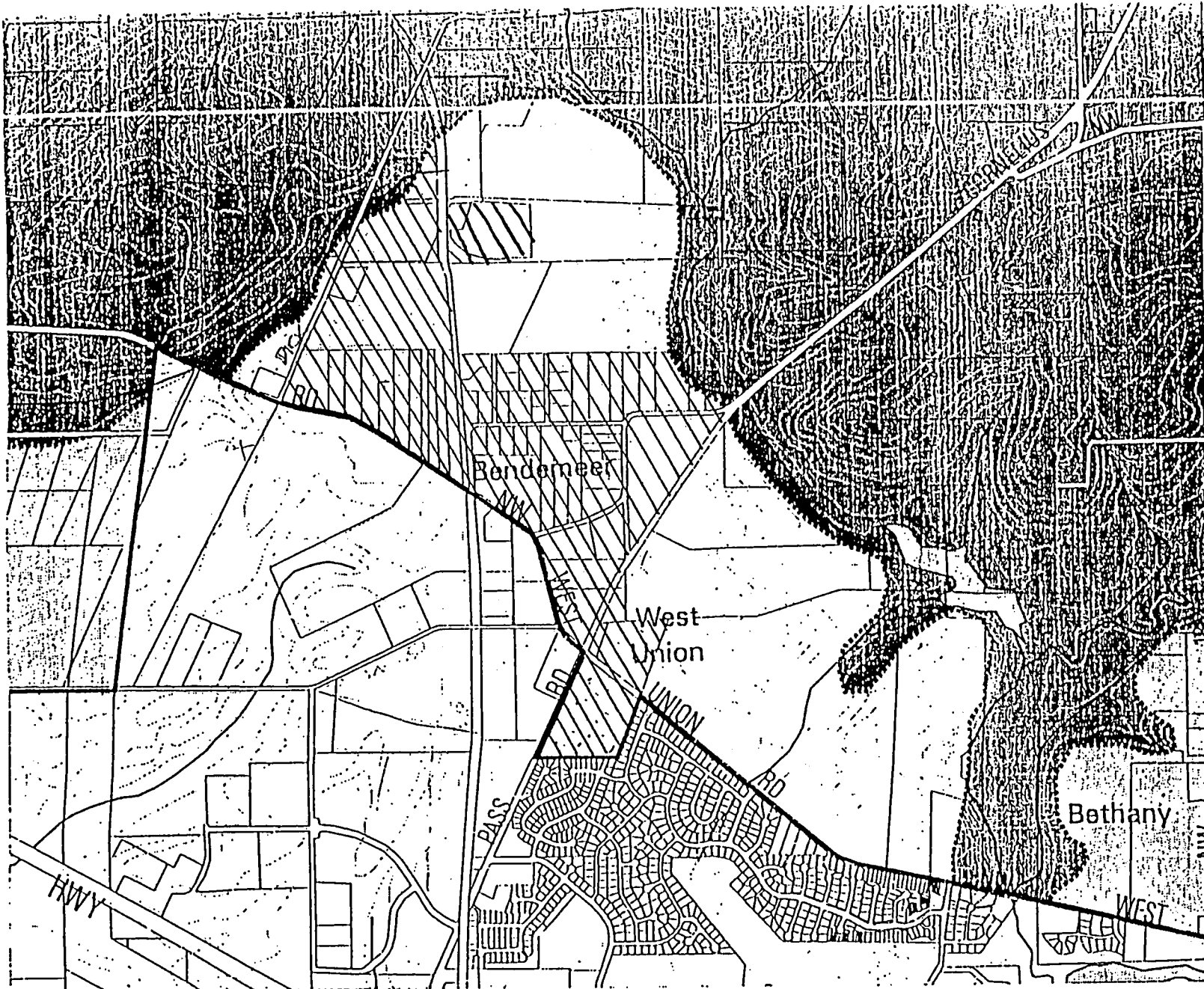
Acres EFU Acres
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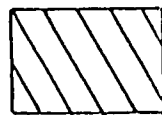
600 NE Grand Ave
Portland, OR 97111-2736
(503) 797-5711



METRO



95418/plm/sst/rooy, plot date: February 28, 1996



- IN

11296-04



City of Cornelius
1355 N. Barlow Street
P.O. Box 607
Cornelius, Oregon 97113

Phone: 503/357-9112
FAX: 503/357-7775

November 12, 1996

METRO

Jon Kvistad, Presiding Officer
600 NE Grand Avenue
Portland, Oregon 97232-2736

RE: Local Re-evaluation of Urban Reserve Study Area # 59,
and Request for Rescoring.


Dear Mr. Kvistad:

Attached is our evaluation of URSA Site # 59. Ben Altman, our contract planner, reviewed the evaluation with John Fregonese, who concurred with our conclusion.

Base on our more detailed local analysis, we are asking that the Council rescore the site giving it a 60, instead of the inappropriately low score of 26.

Thank you for your consideration on this matter.

Respectfully Submitted;


Ralph D. Brown, Mayor



City of Cornelius
1355 N. Barlow Street
P.O. Box 607
Cornelius, Oregon 97113

Phone: 503/357-9112
FAX: 503/357-7775

November 8, 1996

John Fregonese, Director
Metro Growth Management
600 NE Grand Avenue
Portland, Oregon 97232-2736

RE: Local Review and Request for Revised Rating for Urban Reserve Study Area, Site 59.

We have reviewed your standardized rating for our targeted Site 59. We disagree with the extremely low rating given to Site 59.

We understand that your methodology is a mathematical model using standard deviations. We agree that this is an acceptable method, from a regional perspective, provided that there is appropriate opportunity for adjustments to the rating, based on more detailed and accurate local evaluation.

The following is a summary of our local evaluation and basis for our adjusted scoring for Site 59. You gave the site a combined score of only 26.0. **We have scored it at 60!**

You also list the site as 64 acres, including areas north of Council Creek and its Flood Plain. However, our targeted area is only 35 acres, all south of Council Creek and the Flood Plain. Our intent is to keep the Creek as the natural boundary line. Cornelius has no interest in crossing the Creek.

FACTOR 3

Utility Feasibility

Your scoring only gave the site a 3.5.

The site is well served with utilities, only requiring normal and minor line extensions.

WATER - There is a 10 inch water line to the immediate vicinity located in North 4th Avenue. This line has adequate flows and pressure to serve the site. No reservoir or additional system improvements are required, as suggested in the KCM report. Only fire lines will need to be extended, with a possible need to loop the system back to North 7 Court.

SEWER - There is an 8" sewer interceptor located in North 4th Avenue, which will serve the site. The site can also be directly served by the Council Creek Trunk line, which abuts the property. Again, only local service laterals are needed to provide gravity sewer.

STORM DRAINAGE - The site abuts Council Creek. There is adequate channel capacity in the creek, so no extra-ordinary retention or detention is required, other than normal compliance with U.S.A. water quality and quantity standards. On-site storm drainage can be designed to directly outfall to the Creek.

OTHER UTILITIES - Phone, gas, power, etc. are all also immediately available in North 4th Avenue. All are adequate to serve the site. Required system improvements cost will be nominal, no different than for the other adjacent industrial sites in the Davis Oaks Industrial Park.

Therefore, we believe the site should be given a score of 5.

Road Network

You gave the site a score of 1.0.

The site is well served by existing collector streets. It is directly served by North 4th Avenue, which connects to TV Highway. The City is working with ODOT and Washington County to signalize the 4th Avenue highway intersections.

North 4th is also connected to North 10th Avenue by North Holladay Street. North 10th Avenue is our major north/south collector, which connects to the highway at a signalized intersection. North 10th also provides a connection to the north out to the Sunset Highway.

For a single user, only a minor extension of North 4th, maybe into a cul-de-sac, is all that is required to access the site. If the site is subdivided for multiple users, then an additional local street extension may be required, providing a loop from 4th to 7th Court. In either case, road improvements will be nominal, and no off-site improvements are required.

Therefore, we believe the site should be given a score of 5.

Traffic Congestion

You gave the site a score of 5.

There is, of course, peak hour congestion on TV Highway. But generally access is good, particularly for north/south travel on 10th Avenue, out to the Sunset Highway. A signal is already in place at 10th, and signal plans are in process, under MSTIP III

for 4th Avenue. Further, the majority of truck traffic from the industrial area actually uses North 10th to the north out to the Sunset Highway, and not to T.V. Highway.

To rate this as a congested area is wrong. This area is the same as Ronler Acres, because the only congestion issue is on the sunset Highway, inbound east of 185th. Therefore we believe congestion is not a limiting factor for this site.

Therefore, we agree with the score of 5.

Schools

You gave the site a score of 4.5.

This site is planned for industrial development, not housing. Therefore schools are not a factor.

Therefore, we believe the site should be given a score of 5.

FACTOR 4

Efficiency Factor

You gave the site a score of 1.

The site is bounded by the Council Creek flood plain on the north, which provides a logical and natural boundary delineation. The UGB is currently set at the southern flood plain line. Our intent is to keep the flood plain as the natural boundary line. The flood plain and creek provide an excellent buffer to EFU lands to the north. It also creates a significant barrier in the logical and economic extension of roads and urban services. for this reason, Cornelius has no interest in entering the flood plain or crossing the Creek to accommodate urban expansion.

Regardless of how the site was mapped, the City's intent is to annex only to the south flood plain of the creek. It provides for efficient use of the most urbanizable lands south of the creek. Therefore the boundary is very efficient, much more efficient than site 60, which received a score of 5.

Therefore, we believe the site should be given a score of 7.

Buildable Land

You gave the site a score of 0.0.

As described above, the intended boundaries of the site make it 100% buildable. The small portion of flood plain that may be included, can be counted towards required landscaping, thereby

maximizing the buildable portion. The site is also generally flat, which will easily accommodate industrial development. This land is as equally buildable as the adjacent Davis Oaks Industrial Park.

Therefore, we believe the site should be given a score of 8.

FACTOR 5

Environmental Constraints

You gave the site a score of 0.0.

As noted above, there are no or nominal environmental constraints. There is a flood plain, but as noted, this area will have little impact on actual site development, as landscaping credit can be given for the unbuildable portion, if any. There are no wetlands, or other constraints effecting this site.

Therefore, we believe the site should be given a score of 8.

Access to Centers

You gave the site a score of 2.0.

The Closest regional center is in Hillsboro. There is a Main Street in Cornelius, and there is a Town Center in Forest Grove. Again, this site is planned for industrial not residential, so local housing is readily available.

You gave Site 60 a score of 3.5, which is probably ok for housing. But, there is less need to be close to a center for an employment area, since local commercial in Cornelius and Forest Grove can easily serve the needs of employees. Those that may live in Hillsboro or Beaverton could also shop on their way home.

Therefore, we believe the site should be given a score of 5.

Jobs/Housing Balance

It appears that all your scores are based on assumed housing development, not jobs. We see Site 59 as industrial land.

Job Rich

You gave the site a score of 5.0.

Cornelius needs more jobs. That is why we are looking to this site for expanded industrial development. More local jobs will enhance the City's jobs/housing balance.

Therefore, we believe the site should be given a score of 0.

Housing Rich

You gave the site a score of 0.0.

Cornelius and Forest Grove both have strong and growing housing stocks. We need more jobs. That is why we are looking to this site for expanded industrial development. There is no justification for a low rating on this factor.

Therefore, we believe the site should be given a score of 5.

FACTOR 6

Agricultural Retention

You gave the site a score of 2.0

This site is physically separated from other prime agricultural lands by Council Creek. The creek is a natural barrier providing an excellent buffer for EFU lands.

The amount of land included in this site is insignificant towards agricultural products. In comparison the economic production potential as urban land is very significant. This site could generate 300 to 700 jobs, 500,000 square feet of building, and substantial tax value for the City. The highly productive farm lands north of the creek are adequately protected by the creek and riparian vegetation.

Therefore, we believe the site should be given a score of 3.

FACTOR 7

Agricultural Compatibility

You gave the site a score of 2.0

As noted above, the site is naturally buffered by Council Creek from other productive EFU lands to the north. Even as the boundary exists, this site is physically and functionally separated from the real prime EFU lands north of the creek. urban development of the site will not create any negative impacts on farm activities north of the creek.

Therefore, we believe the site should be given a score of 4.

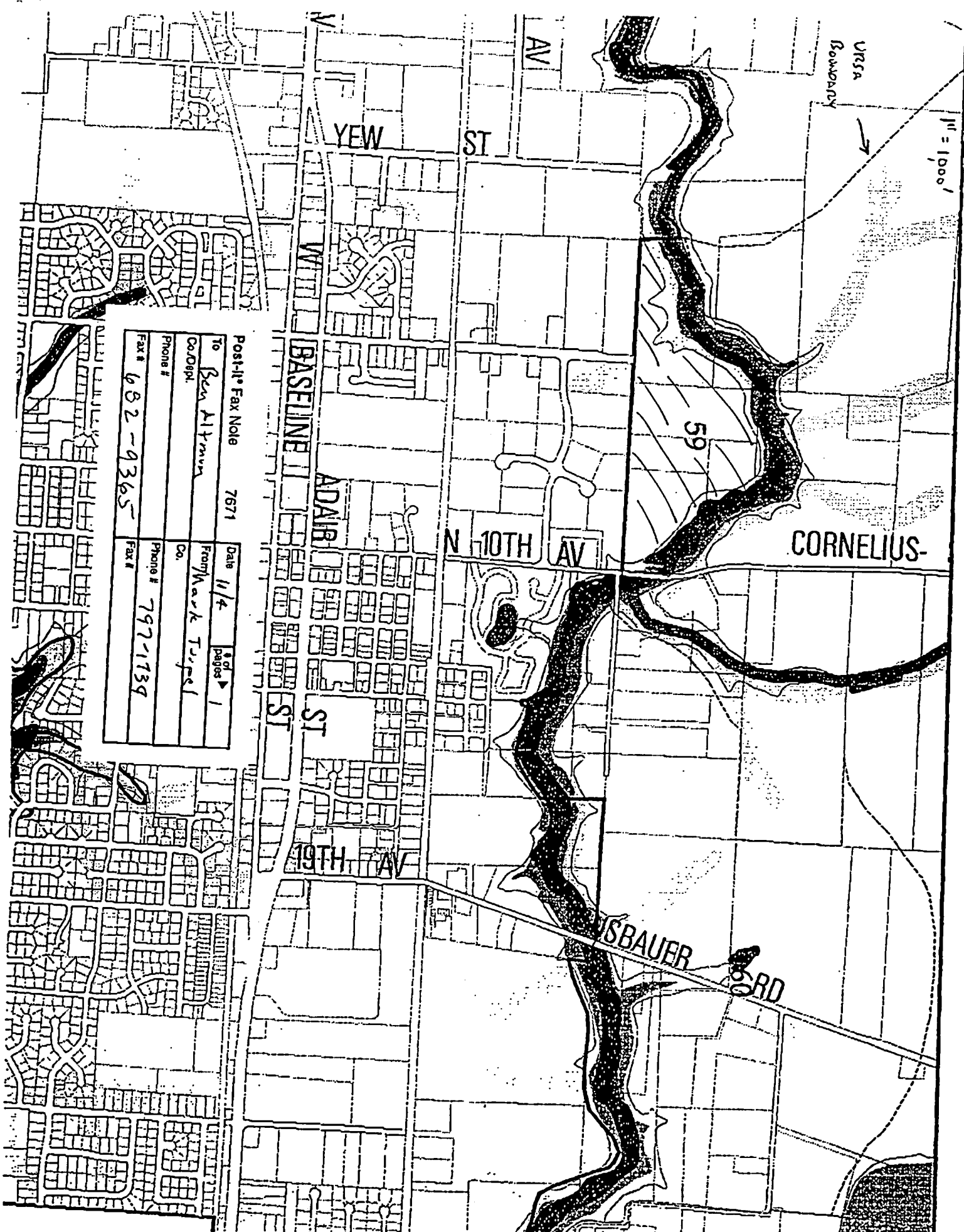
Based on our analysis, we believe the site should be given a combined score of 60.

Sincerely,

A handwritten signature in cursive script that reads "Ben J. Altman". The signature is written in dark ink and is positioned above the typed name.

Ben J. Altman, Cornelius Planning Consultant

Weighted Rating		Urban Reserve Rule Factor 7				Urban Reserve Rule Factor 8		Urban Reserve Rule Factor 9				Urban Reserve Rule Factor 10	Urban Reserve Rule Factor 11
		Utility Feasibility ⁹	Road Network ¹⁰	Traffic Congestion ¹¹	Schools ¹²	Efficiency Factor ¹³	Buildable Land ¹⁴	Environmental Constraints ¹⁵	Access to Centers ¹⁶	Jobs/Housing Balance ¹⁷		Agric. Retention Factor ¹⁸	Agricultural Compatibility ¹⁹
Site #	Score								Jobs Rich	Housing Rich			
44	41.5	3.5	1.0	2.0	3.0	7.0	7.0	3.0	1.5	1.5	0.0	6.0	6.0
45	47.5	3.5	3.0	2.0	3.5	5.0	5.0	2.5	1.5	1.5	0.0	10.0	10.0
46	58.0	2.5	3.0	2.0	2.5	7.0	7.0	3.5	3.0	1.5	0.0	14.0	12.0
47	29.5	3.5	1.0	1.5	2.5	0.0	0.0	0.0	1.5	1.5	0.0	8.0	10.0
48	53.0	3.0	1.0	1.5	1.0	6.0	6.0	3.5	1.5	1.5	0.0	14.0	14.0
49	49.5	3.5	2.5	1.5	1.0	5.0	6.0	3.0	1.5	1.5	0.0	12.0	12.0
50	68.5	3.5	2.0	1.5	1.5	7.0	8.0	4.0	1.5	1.5	0.0	18.0	18.0
51	49.0	3.5	4.0	2.0	4.0	6.0	6.0	3.0	1.5	5.0	0.0	8.0	6.0
52	68.5	4.0	3.5	2.0	4.5	8.0	8.0	4.0	1.5	5.0	0.0	16.0	10.0
53	32.5	4.0	1.0	2.0	3.5	6.0	5.0	2.5	1.5	5.0	0.0	0.0	2.0
54	40.5	4.0	1.5	2.0	4.5	9.0	9.0	4.0	1.5	5.0	0.0	0.0	0.0
55	42.0	4.0	1.5	2.0	5.0	6.0	5.0	2.5	3.0	5.0	0.0	4.0	4.0
56	31.0	3.5	1.0	5.0	3.5	5.0	4.0	2.0	2.0	5.0	0.0	0.0	0.0
57	27.5	3.0	2.0	5.0	5.0	1.0	0.0	0.0	2.5	5.0	0.0	2.0	2.0
58	35.5	4.0	1.0	5.0	4.0	5.0	4.0	2.0	1.5	5.0	0.0	2.0	2.0
59	26.0	3.5	1.0	5.0	4.5	1.0	0.0	0.0	2.0	5.0	0.0	2.0	2.0
60	45.0	4.0	2.0	5.0	2.5	5.0	4.0	2.0	3.5	5.0	0.0	8.0	6.0
61	53.0	2.5	3.0	5.0	1.5	7.0	6.0	3.0	3.5	1.5	0.0	8.0	12.0
62	39.5	3.5	2.5	5.0	1.5	7.0	6.0	3.0	1.5	1.5	0.0	4.0	4.0
63	33.0	2.5	1.0	5.0	1.5	7.0	6.0	3.0	1.5	1.5	0.0	2.0	2.0
64	42.5	3.5	2.5	5.0	1.5	6.0	6.0	3.0	1.5	1.5	0.0	6.0	6.0
65	45.0	4.0	3.0	3.0	2.5	6.0	6.0	3.0	2.0	1.5	0.0	8.0	6.0
66	29.0	2.5	1.0	3.0	1.0	4.0	3.0	1.5	1.5	1.5	0.0	4.0	6.0
67	46.5	3.0	2.0	3.0	2.0	0.0	1.0	0.5	1.5	1.5	0.0	16.0	16.0
68	37.5	3.5	4.5	3.0	1.5	1.0	1.0	1.0	4.5	1.5	0.0	8.0	8.0
69	12.0	1.0	1.5	1.0	0.5	0.0	0.0	0.0	2.5	1.5	0.0	2.0	2.0
70	17.0	1.0	1.5	1.0	0.5	0.0	0.0	0.0	1.5	1.5	0.0	6.0	4.0
71	34.0	1.0	2.5	1.0	0.5	7.0	7.0	4.0	1.5	1.5	0.0	4.0	4.0
72	32.5	0.5	5.0	1.0	0.5	4.0	4.0	2.5	1.5	1.5	0.0	6.0	6.0









Post-It® Fax Note 7671

To	Ben Altrman	Date	1/14	# of pages	1
Co/Dept.		From	Mark Turpel		
Phone #		Co.			
Fax #	682-9365	Phone #	797-1139		
		Fax #			

Urban Reserve Study Areas

Adopted By
Metro Council 2-8-96

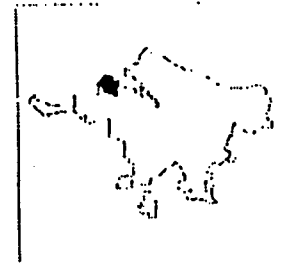
-  This Map's URSA
-  UCD
-  Other URSA's
-  Outside UGI and URSA's
-  Specific Study Area
-  Urban Growth Boundary

42.5

MAP #64

Beckel
Stark

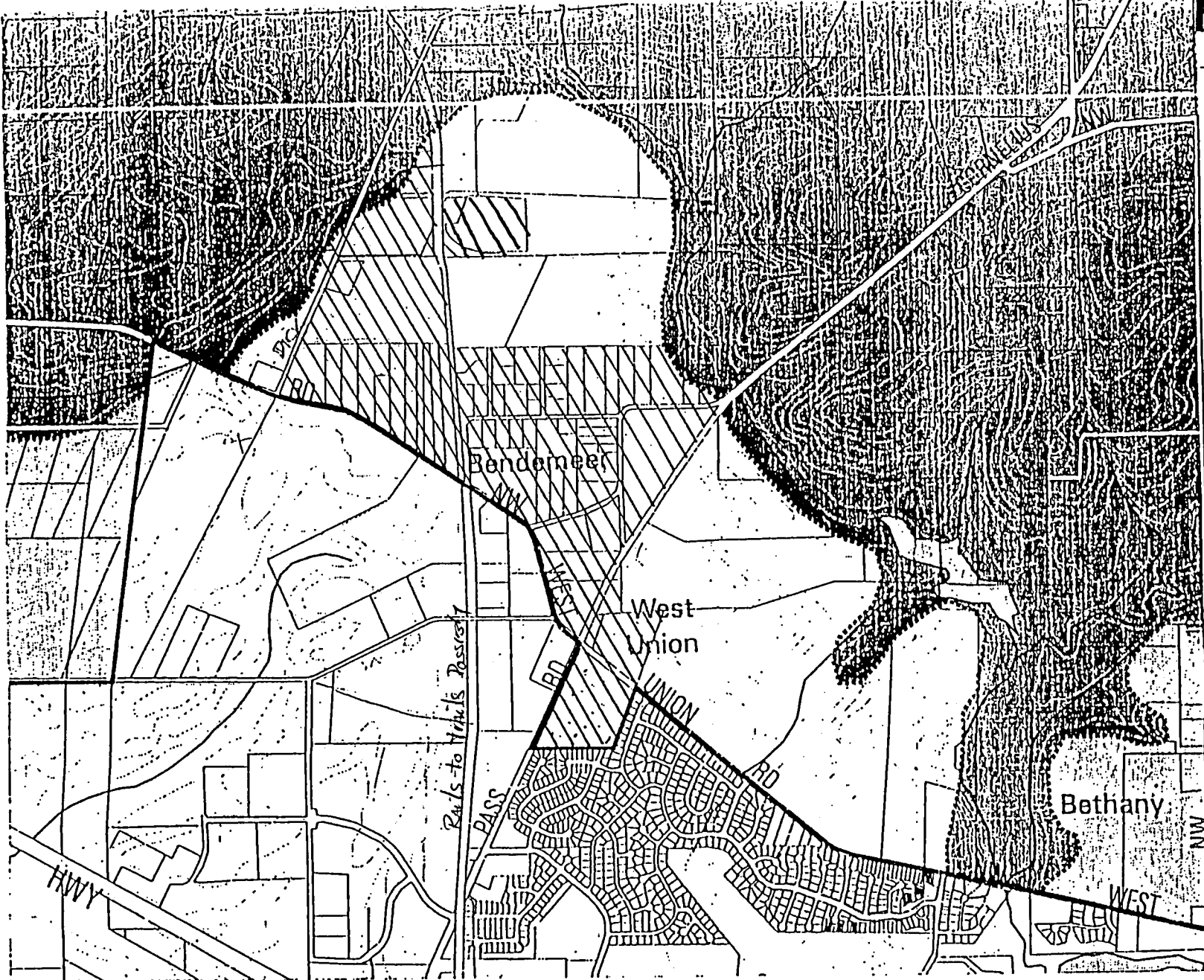
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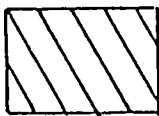
600 NE Grand Ave
Portland, OR 97231-2736
(503) 797-0112



11296-05



PS 412/planimeter plot date: February 28, 1996



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**ADAMS, DeBAST, HELZER, McFARLAND,
RICHARDSON & UFFELMAN**

ATTORNEYS AT LAW

RODNEY C. ADAMS
PAUL J. DeBAST
RICHARD G. HELZER
BARBARA P. McFARLAND
JAMES B. RICHARDSON
JOHN E. UFFELMAN, P.C.

HALL STREET STATION
4500 S.W. HALL BOULEVARD
BEAVERTON, OREGON 97005-0504
TELEPHONE (503) 644-2146
FAX (503) 646-2227

November 12, 1996

Susan McLain
Metro Service District
Urban Reserve
600 NE Grand Ave
Portland OR 97232

Re: Pacific Plastics Area 64

Dear Ms. McLain:

Pacific Plastics is a plastic pipe manufacturer manufacturing drainage pipe, sewer pipe, water pipe and continuous plastic for fiber optic cross country installations. They have existed on the same 9 plus acre tract for well over 25 years. This 9 plus acre tract is zoned as Rural Industrial. The remainder part of this property is zoned as EFU.

1. Location: East of Dick Road, adjacent and immediately east of railroad with spur service to the site.
2. Tract Size: Total tract is approximately 30+ acres with westerly 9+ acre zoned Rural Industrial and easterly portion within the EFU zone.
3. Employment: Current employment varies from 140 to 150 employees.
4. Needs: Need to expand to construct the following:
 - a. Covered storage warehouse
 - b. One to two additional bays for line production
 - c. Exterior storage by expansion of existing storage area onto westerly 700 feet of the EFU zoned area. Exterior storage would require no construction other than the graveled lot and exterior fencing.

Contacts to Date: We have met with Washington County relative to expansion and with the City of Hillsboro relative to inclusion of area within the Urban Reserve Area.

Susan McLain
Metro Service District
November 12, 1996
Page 2

The County sees almost no possibility for expansion onto the EFU site and the City of Hillsboro indicates they would support the expansion of this area within the Urban Reserve Boundary.

Choices for Pacific Plastics:

Pacific Plastics "must expand" its production and storage capability. Its first choice is to expand on site. This would add somewhere between 30 and 40 new jobs to the economy. The second choice if unable to expand on site, Pacific Plastics would be required to re-locate at least part of the production (possibly the polyethylene lines) to another location (possible Baker City, Oregon) at a substantial cost. The relocation would reduce employment at subject site by approximately 60 employees.

The third choice, if production can not be increased or be split into two areas as a last resort, the site would have to be abandoned in which case the entire employment base would be lost.

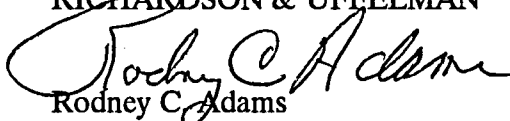
Argument for Inclusion:

1. This area was committed to exclusive use since the early 1970's, and its use needs to be recognized and legitimized.
2. A substantial portion of this area is already committed to commercial and/or industrial use with a shopping center at the northwest corner of Cornelius Pass and West Union. An auto service center on the northeast corner and various commercial and industrial facilities in the area.
3. The AF-5 area lying north of West Union and south of site precludes farming for most of the area.
4. The railroad spur tracks are one of the few remaining spur tracks available in Washington County to service industrial production. Railroad spur is necessary for the delivery of raw material resins and shipping of product.
5. While Hillsboro has a supply of industrial property, there is a lack of industrial property with railroad access, which is needed for many industrial users.

We will be in attendance at the hearing on November 12, 1996 to provide further information.

Very truly yours,

ADAMS, DeBAST, HELZER, McFARLAND,
RICHARDSON & UFFELMAN









Rodney C. Adams

RCA:mm
cc: Pacific Plastics

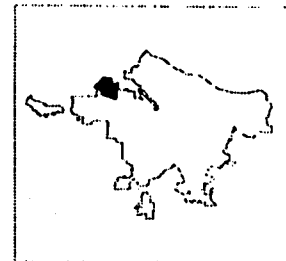
Urban Reserve Study Areas

Adopted By
Metro Council 2-8-96

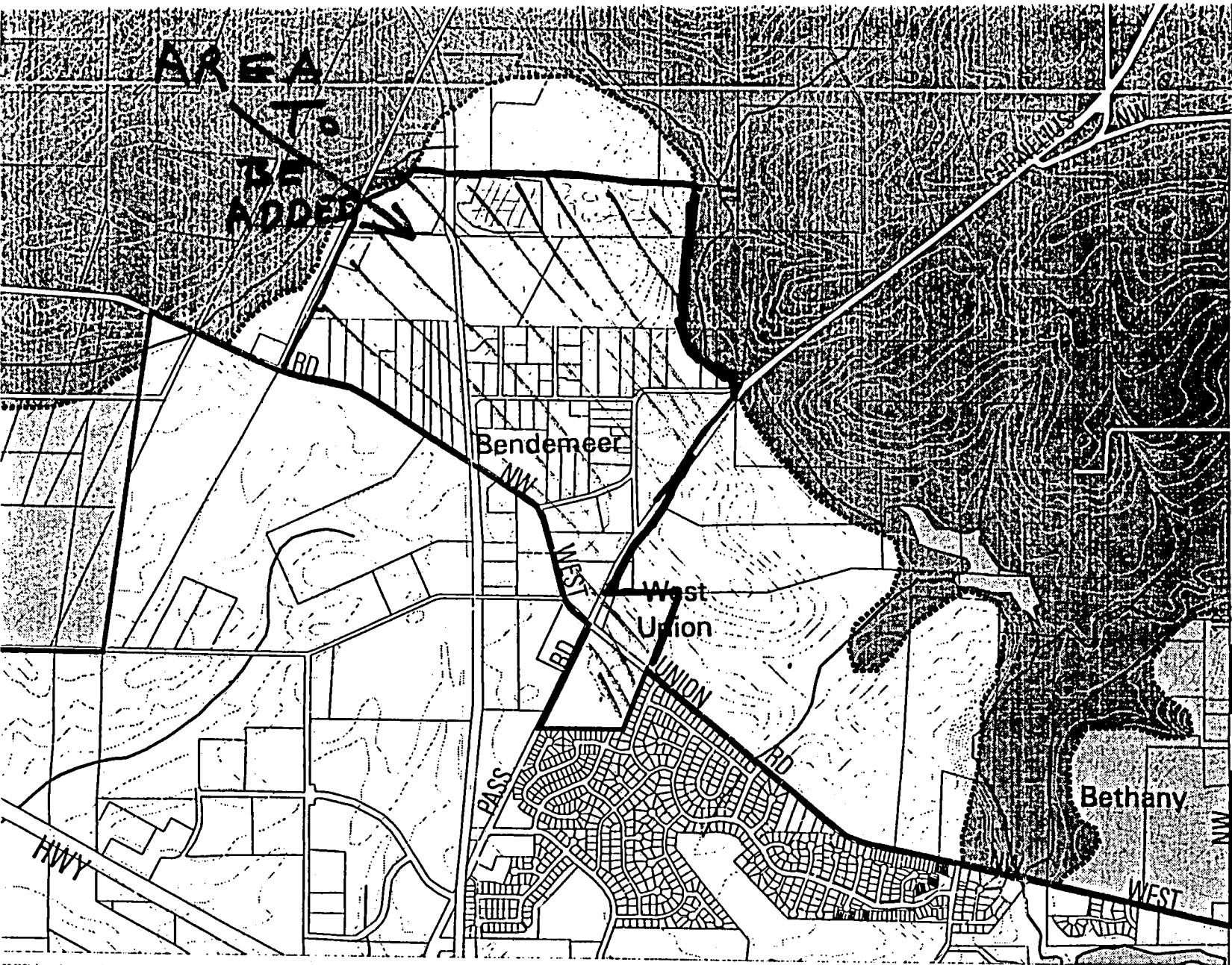
-  This Map's URSA
-  UGB
-  Other URSA
-  Outside UGB and URSA
-  Specific Study Area
-  Urban Growth Boundary

MAP #64

Acres EFU Acres
615.91 400.000



600 NE Grand Ave
Portland, OR 97232-2736
(503) 797-1942



95418/plansalescov, plot date: February 28, 1996

Pacific Plastics

WEST UNION

Pacific Plastics plans to expand its plastic pipe business by opening in other areas. That is, if other areas ever look attractive enough.

Pacific Plastics is headquartered in West Union, an erstwhile rural community bordering the Urban Growth Boundary at the nether reaches of the Sunset Corridor. The company was ranked 131 in 1991, and crept up to 127 in 1992 as revenue expanded from just more than \$18 million to about \$20 million. From the company's founding in 1967 to 1981, it grew to the \$3 million mark, and reached \$20 million in 1992. Growth has been over \$2 million a year the past few years.

Chuck Gray, vice president, said the firm produces PVC (polyvinyl chloride) pipe ranging from one-half inch to 12 inches in diameter. The pipes are used for everything from lawn sprinkling systems to industrial, agricultural, and infrastructure such as sewer and plumbing.

They also make one-half inch to six-inch electrical PVC duct that is UL (Underwriters Laboratory) approved for conduit for wiring. This



Chuck Gray sees the reflection of success in Pacific Plastics' pipes, used for everything from lawn sprinkling systems to irrigating farmers' fields.

is used by firms such as GTE, US West, PGE, and Puget Power. They are among the top independent West Coast producers of PVC pipe. The larger producers are not independent, and include Johns Manville, owned by Formosa Plastics of Taiwan, and Pacific Western in Eugene, owned by Simpson Lumber.

"Our production facilities are as large as theirs — it's just that they have more of them," Gray said.

They are also the West Coast's largest producer of polyethylene pipe. This continuous roll of sheathing is usually used to lay fiber optic cables in the ground. PVC pipe comes in 20-foot sections; polyethylene comes in long coils as long as 6,000 feet.

Hot and insulated. Fortunately — or unfortunately — the Northwest is one of the few hot areas in the country economically. "I don't know if you've travelled much around the country this year," Gray commented, "but things are pretty depressed in California, the Southwest, the Midwest,

and New England. We're in an insulated bubble."

That means it is hard to find another market to expand into, and at the same time Pacific Plastics has to watch its backside in the Portland market.

"We have to be competitive here in Portland with pipe made in Los Angeles," he said. Although Pacific Plastic has had a record year, Gray concedes "Never have we sold so much to so many for so little."

The way the company expands is to grow into new territory. They bought Arrow Plastics in Salt Lake City, which has its own

production and sales offices. The West Union headquarters has more than 60 employees, and Salt Lake City has 40.

The company was founded in 1967 by Loyal Sorensen, the president, on the same 40 acre rural location where it still operates. Gray, who joined the firm in 1981, said the company would like to expand into northern California. "There is a lot of territory under irrigation, but they are struggling economically. Things would have to change considerably for us to make the move."

While waiting for the economy to improve elsewhere, Pacific Plastics is growing by developing new products. Some plastic garbage from Seattle is being recycled into such things as sign posts. Pacific Plastics said they are doing research and development on a four by four post made of recycled materials. If so, they may also make park benches and fences tomorrow out of yesterday's baggies and bottles. The company creates no waste — all scrap is ground up and recycled into new plastic pipe.

"It's a clean industry. Everyone is working hard to save the planet," Gray said.

PACIFIC PLASTICS
OREGON BUSINESS MAGAZINE
OCTOBER 1992

GLENCOE H.S
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Metro
Urban Reserve
Citizen Input Form

This form was created to help you best communicate your concerns and questions on the urban reserve selection process to the Metro Council. Please be as specific as you can about the study area(s) that interest you. If possible include any information that relates directly to the selection criteria (*listed on the reverse side of this sheet*) on which the Metro Council will base their decision on the urban reserves. The Metro Council's decision will reflect both the review of the state-required selection criteria as well as other discretionary factors, such as supporting the elements of the 2040 Growth Concept.

Please take a moment to answer the following questions and return your completed form to Metro open house staff or mail to: Metro Growth Management Services
600 NE Grand Ave.
Portland, OR 97232

Name: JIM EMERSON

Address: 13900 N.W. OLD GERMANTOWN RD.

City, State & Zip: PORTLAND, OREGON 97231

Phone Number: 283-4096

Address or Location of Parcel: SPRINGVILLE / KAISER ROAD AREA

Urban Reserve Study Area Number(s): 65, 66

Briefly summarize your concern or questions:

WE AGREE WITH EXECUTIVE OFFICER'S
RECOMMENDATION TO EXCLUDE 65 & 66
FROM URBAN RESERVE DESIGNATION. URBANIZATION
HAS PROCEEDED TOO FAR NORTH INTO FARMLAND, AND
TOWARDS FORESTED SIGNIFICANT WILDLIFE AREA AND
STREAMS, ALREADY.

If you have any additional questions please feel free to contact John Donovan at Metro 797-1871.