



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oregon State Office
2600 S.E. 98th Avenue, Suite 100
Portland, Oregon 97266
(503) 231-6179 FAX: (503) 231-6195

October 24, 1996

Jon Kvistad, Presiding Officer and Metro Councilors
Metro Regional Center
600 NE Grand Avenue
Portland, Oregon 97232

Dear Mr. Kvistad and Councilors:

In light of the Metro hearing on the Urban Growth Management Functional Plan (Functional Plan) scheduled on October 24, 1996, the U.S. Fish and Wildlife Service (Service) would like to submit this letter to reiterate written testimony submitted in a letter dated September 16, 1996 (attached). The Service has participated on the Water Resources Policy Advisory Committee which developed Title 3, a vital component of the Functional Plan as it is the only Title which addresses protection of the region's natural resources. Although Title 3 is limited in that it only addresses water quality and flood management issues, while leaving items such as broader fish and wildlife concerns and watershed-based planning for future consideration, it is still a major step towards establishing regional guidelines and policies which will protect the many functions and values of floodplains, water bodies, and adjacent buffer zones.

It is critical that as plans develop to direct growth in keeping with a tight Urban Growth Boundary, that concurrent planning take place to ensure long term natural resource protection and environmental health. Adoption of Title 3 as part of the Functional Plan will help to ensure that the numerous natural functions that sensitive water areas and floodplains provide will be protected. The Service included many specific recommendations for improving Title 3 so that it would better protect these areas in the previous letter containing written testimony, and we still urge Metro to incorporate those suggestions.

The Service also recommends the development of Title 9 Performance Measures which would relate specifically to Title 3 in order to provide a feedback loop for assessing the effectiveness of Title 3 provisions in meeting the intended intent. Much scientific research has been conducted on the effectiveness of various riparian buffer zone widths to provide numerous natural functions, and it is questionable whether or not the buffer zones specified in Title 3 will be adequate. It seems like it would be appropriate for an entity like the Water Resources Policy Advisory Committee to be charged with developing these performance measures. Adequate natural resource protection is vitally important for maintaining the region's livability and environmental health. A feedback loop allowing for the incorporation of future Title 3 revisions based on actual findings from the performance measures is imperative for assuring that the provisions will adequately meet the specified intent of Title 3, which is "To protect the beneficial uses and functional values of resources within the Water Quality and Flood

Management Areas by limiting or mitigating the impact on these areas from development activities.”

Please feel free to contact Jennifer Thompson or Patrick Wright of my staff at the above phone number or address if you have any questions or comments. Thank you for the opportunity to provide written testimony on the Functional Plan once again.

Sincerely,

A handwritten signature in cursive script that reads "Patrick D. Wright". The signature is written in dark ink and is positioned to the right of the word "for".

Russell D. Peterson
State Supervisor

for



112196-27

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Oregon State Office

2600 S.E. 98th Avenue, Suite 100

Portland, Oregon 97266

(503) 231-6179 FAX: (503) 231-6195

September 16, 1996

Metro Council
Metro Regional Center
600 NE Grand Avenue
Portland, Oregon 97232

Dear Metro Councilors:

The U.S. Fish and Wildlife Service (Service) is submitting this letter as written testimony on the Urban Growth Management Functional Plan (Functional Plan). As the principal agency through which the Federal government carries out its responsibilities to conserve, protect, and enhance the nation's fish and wildlife and their habitats for the continuing benefit of people, the Service is confronted with great challenges in the face of a growing nation with the associated demands and impacts to the country's natural resources. Long-term planning and sound policy development that protect natural resources are two of the most effective mechanisms to prevent the loss of fish and wildlife resources. In line with our agency mission, the Service has been, and continues to be, a participating organization on the Water Resources Policy Advisory Committee which has developed Title 3 of the Functional Plan.

GENERAL COMMENTS

The Service encourages your support of Title 3, with the incorporation of the specific recommendations to follow. Title 3 is a vital component of the Functional Plan and serves as a major step in establishing guidelines and policies which will allow for fish and wildlife habitat conservation, sustainable or improved water quality, and the continued ability of natural drainage systems and floodplains to function. In addition, we urge you to promote and support the development of a sound Water Quality and Flood Management Model Ordinance (Model Ordinance) which will contain specific guidelines and policies related to items in Title 3.

It is important to note that throughout the development of the Title 3 language, many details and issues were deferred for inclusion in the Model Ordinance. In order to set effective policies which will ensure protection of the region's natural resources, the deferred issues must be addressed in the Model Ordinance. At the same time, these issues must relate back to Title 3 language. Incorporation of the specific recommendations included in this letter would help to clarify and strengthen Title 3, which would provide a sound framework on which to build a defensible Model Ordinance.

BACKGROUND INFORMATION

The following lists some of the many functions of floodplains, riparian zones, and wetlands which are in

need of protection through Title 3 and the Model Ordinance:

Fish and Wildlife Habitat:

- There are currently 54 Federally listed threatened, endangered, proposed, candidate, and special concern species within Multnomah, Washington, and Clackamas counties. Over 80% of these species depend on wetlands, riparian habitat, or the functions they provide for one or more stages in their life cycles. Riparian and wetland area protection can benefit listed species, as well as prevent the future listing of other species.
- Healthy riparian areas provide connected, protected corridors for wildlife to travel between seasonal ranges and alternate habitat parcels, allowing for species dispersal. This mobility facilitates genetic exchange and allows utilization of a wider range of potential habitat.
- Undisturbed riparian vegetation is composed of a mosaic of various successional stages and plant communities, which equates to high habitat diversity necessary to support diverse communities and populations.
- Undisturbed riparian systems typically contain an assortment of habitat characteristics including multiple canopy layers, snags, woody debris, irregular edges (which provide a diverse interface between riparian areas and differing habitat types, furthering habitat diversity), undercut banks and overhanging vegetation. These complex characteristics provide the diverse habitat requirements necessary to support a wide range of naturally occurring fish and wildlife species.
- Although riparian areas cannot ameliorate all adverse upland impacts, they provide the greatest resources needed by fish and wildlife in the smallest area, and thus are a priority for protection.
- In developed and developing landscapes, riparian areas provide critical refuge when adjacent habitat is lost or degraded.

Floodplains and Riparian Zone Effects on Flooding:

- Floodplains naturally accumulate the appropriate type and balanced amount of organic matter and dissolved nutrients which are flushed into streams and rivers during runoff events. At natural levels, this material supplies fish and aquatic invertebrates with a rich source of food that can enhance production.
- Intact vegetation buffers the impact and erosive forces of rain as it hits the ground, and helps to slow and store water as it flows across the landscape. The greater the vegetative cover in a watershed, the greater the amount of water that can be slowed and held for gradual release. Riparian areas and floodplains moderate both high and low stream flows, thus providing more consistent flows throughout the year.

Water Quality:

- Riparian buffers which retain adequate vegetation and intact soils intercept, store, and biodegrade significant portions of pollutants.
- Riparian buffers filter and break down nutrients. By preventing nutrient loading and excessive aquatic plant and algal growth (which can ultimately cause oxygen depletion and excess ammonia), an increase in water acidity is avoided, which would otherwise adversely impact fish and other wildlife by slowing fish growth and negatively impacting reproduction in some species. Plant roots help to stabilize the soil. Typically, trees and shrubs have deeper roots which perform this function best. Maintaining woody vegetation and limiting soil disturbance in

riparian areas will prevent significant quantities of sediment from entering stream systems.

SPECIFIC RECOMMENDATIONS

Title 3. Water Quality and Flood Management Conservation:

Section 3, B. Change the section to read, "Demonstrate that the plans and implementing ordinances substantially comply with the performance standards contained in Section 4 and the Model Ordinance. In this case, the purpose of the Model Ordinance is to provide a performance standard for evaluation of substantial compliance for those jurisdictions who choose to develop their own guidelines for water quality and flood management areas; or"

Section 4, C, paragraph 2. Change the last sentence to read, "Metro and local governments shall recognize that pre-existing development within the Water Quality and Flood Management Areas shall be exempted from the provisions concerning conservation easements and purchase or donation of fee simple ownership to public agencies or private non-profits for preservation." This would exempt pre-existing development, but all new development described in an application would be required to adhere to the regional policies and guidelines.

Section 5, B, paragraph 1. Include language explaining when and how the temporary standards will be replaced by permanent standards.

Section 5, B, 1, d. Add "Bridges should be built whenever practicable." Also add, "Culverts are required to maintain adequate stream levels and flows, and must be properly installed and of appropriate size and type to ensure fish passage."

Section 5, B, 3. Include the requirement that revegetation efforts be monitored, and that a contingency plan be carried out to ensure revegetation of the site to 90 percent cover if the project fails to meet this guideline within the first 3 years.

Section 7. Include variance procedures for claims of map and survey errors to enlarge or add stream corridor, wetland, and floodplain protection, as these errors are as likely to occur as those which would warrant reducing or removing stream corridor protection. Include general guidelines for public hearing and appeals processes for discrepancies.

Various sections. If they are one in the same, change references from "Model Code" to "Model Ordinance" for consistency throughout the Title.

Title 10. Definitions:

"Water Quality and Flood Management Area". The map being developed to coincide with the Metro Water Quality and Flood Management Model Ordinance should be used *as a tool only* for implementing the Model Ordinance. The map will invariably contain errors, as it is being compiled from numerous

sources of various scales and accuracies, and actual on the ground conditions may change over time. Therefore, guidelines should be developed to coincide with the intended map boundaries. The map should be used as a starting point in order to determine if a closer inspection of a property will be needed. Where discrepancies arise between the map and the guidelines, the guidelines should take precedence. This clarification should be included under the definition, and the first sentence in the definition which reads, "means an area defined on the Metro Water Quality and Flood Management Area Map, to be attached hereto" should be deleted.

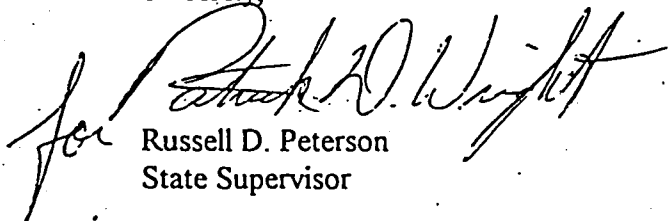
"Fish and Wildlife Habitat Conservation Area". The definition should include significant upland habitat, corridors, and open spaces. Also, the last sentence should be changed to read, "This area has been mapped to generally include the area 200 feet from the top of bank of streams with less than 25% bank slope, 100 feet from the edge of wetlands, and proportionately greater buffers along streams and wetlands with bank slopes greater than 25%." The purpose of these changes is to include buffers where slopes are greater than 25%, to clarify that "slope" refers to banks and not stream gradient, and to remove references to "undeveloped areas" which will allow developed areas to be mapped as well. All new development within conservation areas, including that within a partially developed area or areas planned for redevelopment, should adhere to the regional guidelines and policies.

"Riparian Area". The word "and" in the first sentence after "soil-vegetation complex" should be changed to "and/or." The word "or" is significant in this case because the soil-vegetation complex can often affect a water body well beyond the area in which the water body has an affect on the soil-vegetation complex.

We are fortunate that options are still available to plan and direct growth in the Portland metropolitan region which can allow for all facets of a livable and sustainable region. It is critical that we work together to integrate the desired characteristics of this region by considering natural resource issues along with economic growth and development policies, as they are dependent on and affected by each other. Avoiding impacts to natural resources and their functions is much more effective than fixing problems later both in terms of maintaining resource health and in preventing the unnecessary costs of repair, restoration, or attempting to recreate lost functions through artificial means.

Please feel free to contact Jennifer Thompson or Patrick Wright of my staff at the above phone number or address if you have any questions or comments. Thank you for the opportunity to provide this written testimony and comment on the Functional Plan.

Sincerely,

for
Russell D. Peterson
State Supervisor

October 25, 1996

Barbara J. Telford
Barry D. Olson
6000 NW Cornell Rd.
Portland, Oregon 97210

Metro Council
600 NE Grand Ave.
Portland, Oregon 97232

We feel the Skyline Area should not become an Urban Reserve. The area is very steep and prone to land slides as evidenced by last winter's multiple slides in the area. This area has significant environmental value and should not be included in the Urban Reserve.



Barbara Telford
Barry Olson

112196-29

SCOTT O. PRATT

ATTORNEY AT LAW

THE JACKSON TOWER

SUITE 1200

806 S.W. BROADWAY

PORTLAND, OREGON 97205

503-241-5464

October 25, 1996

Metro Council
600 NE Grand Ave.
Portland, OR 97232

Re: Urban Reserves

Dear Councilors:

When you make the final decision about Urban Reserves, please exclude the 510 acres in the Skyline area bordering Forest Park. This land does not meet any of the criteria for Urban Reserves.

Specifically, the Skyline area cannot provide maximum housing density due to its steep slopes, unstable soils and unique environmental characteristics. It would also be extremely expensive to provide public services to this area. Finally, due to its proximity to the Forest Park and the coast range, this area protects wildlife and plant life which would be destroyed by any urban use of this land.

When you make the final decision on Urban Reserves, I hope you will recognize that the Skyline area is uniquely suited for open space and would not be well used for residential, commercial or industrial uses.

Very truly yours,



SCOTT O. PRATT

SOP:han

112196-30

FAX 503/274-0341

PHONE 503/222-4937

PROTEUS, INC.

LITERARY CONCEPTS
PROTEUS PENSION PLAN & TRUST
PROTEUS PROPERTIES

P.O. Box 9281 • Portland, Oregon 97207

David Rorvik, President/Agent

Oct 24-96

Metro Council
600 NE Grand Ave.
Portland, OR 97232

To Metro:

This is to urge that you do not
include skyline and URSA's in
the Urban Reserve. Inclusion will
have very negative environmental
impact on Forest Park.

Sincerely,

David Rorvik

112196-31

10-23-96

KEITH and LUCIA POWERS
2870 NW Cumberland Rd.
Portland, Oregon 97210-3802

Metro Council

I understand a vote is to be taken (in December?) on whether or not the Skyline Area URSA is to become a part of the Urban Reserve.

I cannot fathom anyone in their Right Mind, voting to include such unstable land in a future development of any kind!

Have any of you visited and driven around the Forest Heights development? Look at how the land has been and is being Raped with No concern for the instability found in that area. Wetlands have been destroyed, natural stream and Run off patterns disrupted or eliminated. The Skyline area is even more sensitive.

Look on Thompson at Miller Road and see the rivers of mud from the House of Dreams sight

This is irresponsible land use if the decision ^{is made} to move the land into the Urban Reserve area.

We don't need more people in Portland area.

Lucia Powers

112196-32

John Griffiths
10245 SW 153 Avenue
Beaverton, OR 97007

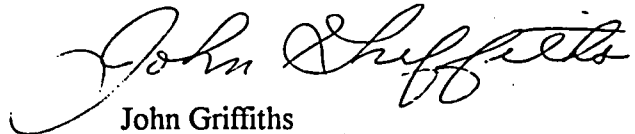
October 26, 1996

Metro Council
600 NE Grand Avenue
Portland, OR 97232

Dear Metro Council,

I urge the Council to adopt the recently published recommendation of the Metro Executive Officer that the Skyline area **not** be included in the Urban Reserve. Inclusion of the Skyline area in the Urban Reserve would negate many of the benefits Metro is seeking to attain through its Open Spaces program within the Forest Park regional target area. In addition the Skyline area cannot accommodate high-density development due to its steep topography, unstable soil conditions, restrictive zoning, CCRs, and conservation easements.

Sincerely,


John Griffiths

112196-33

October 25, 1996

Metro Council
600 N.E. Grand Avenue
Portland, OR 97232

Dear Council Members:

We applaud the recent Metro Executive Officer Recommendation not to include the Skyline Blvd./Forest Park URSA among the Urban Reserves. The area in question has priceless value in making our city unique among other major metropolitan districts of the nation and indeed throughout the world; an exquisite sylvan refuge literally only blocks from the commercial center of the region.

Thus be it ever. My wife and I along with not a few who share our feelings will militantly, steadfastly oppose any attempt to take this from us and our children. We respectfully urge Council Members to not permit the slightest diminution of this heritage treasure which once lost can never be regained.

Sincerely
Jack Wells *Connie Saffarano*
Jack Wells Connie Saffarano
7101 S.E. Harrison
Portland, OR 97215

(503)-774-2368



112196-34

OAK LODGE COMMUNITY COUNCIL

Robert Waldt
Chairperson

3225 Loffleman Road
Oak Grove, Oregon 97222

November 14, 1996

Mr. Mike Burton, Executive Officer
Metro
600 NE Grand Ave.
Portland, Oregon 97232-2736

Dear Mr. Burton:

The Oak Lodge Community Council opposes the Metro 2040 Plan's goal of densification of Portland and surrounding communities such as Oak Lodge. We favor, instead, expansion of the urban growth boundary as the best way to relieve congestion, protect neighborhood open space, minimize the cost of government services and maintain affordable housing.

The Oak Lodge Community Council is the Community Planning Organization that represents the Oak Lodge and Oatfield Ridge areas in Clackamas County. Our territory extends from the Willamette River on the west to Aldercrest Road on the East and from Milwaukie on the north to roughly Roethe Road on the south. The population of our area is over 20,000.

The Council understands that infill will continue to occur in our neighborhoods and accepts that without reservation. We oppose, however, plans that would increase the density requirements in existing neighborhoods. Based upon this principle, we want to express the following concerns about the Urban Growth Management Functional Plan (UGMFP). References to the UGMFP are to the October 24, 1996 draft version that was presented to the Metro Council Regular Meeting of that date.

Assigned members of the Council have read the UGMFP and made a report at a meeting of the Council on November 13, 1996. Based upon these events we find the following items to be of significant concern to our membership.

- **No Prohibition on Accessory Units** – Title 1, Section 7, Paragraph C (line numbers 292 to 297) states "Cities and counties shall not prohibit the construction of at least one accessory unit within any detached single family dwelling that is permitted to be built in any zone inside the urban growth boundary. Reasonable regulations of accessory units may include, but are not limited to, size, lighting, entrances and owner occupancy of the primary unit, but shall not prohibit rental occupancy, separate access, and full kitchens in the accessory units."

The Council believes that this provision will result in severe negative changes in the character of our existing neighborhoods. Citizens live in our low density residential neighborhoods for a reason – they choose to do so. For many, their homes represent their largest and single most important asset. This provision provides for diminishing that asset. The suggested condition of owner occupancy of the primary unit implies a reasonable measure of control over the use of these units. This condition will be virtually impossible to enforce.

- **Methods to Increase Capacity** – Title 1, Section 2, Paragraph A (line numbers 98 to 113) states in relation to required changes to comprehensive plans “All zones allowing residential use shall include a minimum density standard which provides that no development action, including a partition or subdivision, may be approved unless the development will result in the building of 80 percent or more of the maximum number of dwelling units per net acre permitted by the zoning designation for the site.” The Council questions as to whether there is any time-line during which construction must take place. For example, if a citizen desires to subdivide their property and must build eight units, must they all be constructed at once, or can they be constructed over a time frame as funds become available?
 - **Requirements to Increase Capacity** – Title 1, Section 4 (line numbers 141 to 168) states in paragraph A “All cities and counties shall determine whether actual built densities for housing during 1990 – 1995 were less than 80 percent of maximum zoned densities. The 1990 to 1995 actual built densities within its jurisdiction shall be compared with zoned densities for housing units during the period.” The section goes on to discuss under paragraph B what actions shall be taken if actual built densities were less than 80 percent. We have questions regarding these provisions.
 - It is not clear as to how the remedies in paragraph B are to be applied. Are they to be administered to all land in the jurisdiction, to zoning districts as whole that did not comply (e.g. Residential 10,000 square foot lot size), zoning districts in given geographical areas that did not comply or geographical areas that did not meet the 80 percent test. For example, if a given geographic area was built at 90 percent of the maximum zoned densities, would it be exempted or would it still be required to comply with new requirements?
 - Item a. in paragraph B (line number 161) permits as one of the methods “Financial incentives for higher density housing.” What kinds of financial incentives are envisioned? From what source are these financial incentives going to be paid?
 - **Effect of Various Ordinance Provisions on Calculated Capacity** – Title 1, Section 5, Paragraph C (line numbers 225 to 238) requires that cities and counties “Determine the affect of each of the following on calculated capacities, and include and resulting increase or decrease in calculated capacities:” Item 4. states “The effects of tree preservation ordinances, environmental protection ordinances, view preservation ordinances, solar access ordinances, or any other regulations that may have the effect of reducing the capacity of the land to develop at the zoned density.” While never explicitly stated, it appears that Metro favors reducing such potential restrictions. This is an interesting contrast to the *Metro 2040 Framework Update* of Fall 1996/Winter 1997 which states, on page 2, “Protecting streams is a priority.”
- The Council does not believe that the quality of our environment should be sacrificed for increased density. Any implication of this nature by Metro is unacceptable.
- **Affordable Housing** – Title 7, (line numbers 849 to 906) discusses affordable housing. Section 2 includes recommendations to improve the availability of affordable housing.

Several of these (paragraphs A, C, D and G) effectively require tax-payer subsidized options. Once again, from what source are these funds going to arise?

Section 3 of Title 7 discusses appropriate placement standards for manufactured housing within the Urban Growth Boundaries. This includes less than a five acre requirement for a manufactured housing park and manufactured homes configured as multifamily structures where zoning densities are consistent with single story development. The Council firmly believes these requirements will have a significant negative impact on the value of existing properties and the character of existing neighborhood. If Metro believes otherwise, we request that they conduct an appropriate scientific study to establish otherwise.

If you have any questions or comments please do not hesitate to contact me at 654-7435.

Sincerely,



Robert Waldt
Chairperson

CC: ✓ Mr. Jon Kvistad, Presiding Officer, District 3
Ms. Susan McLain, Deputy Presiding Officer, District 4
Ms. Ruth McFarland, Councilor, District 1
Mr. Don Morissette, Councilor, District 2
Mr. Ed Washington, Councilor, District 5
Mr. Rod Monroe, Councilor, District 6
Ms. Patricia McCaig, Councilor, District 7
Ms. Darlene Hooley, Chair, Clackamas County Commissioner
Mr. Ed Lindquist, Clackamas County Commissioner
Ms. Judie Hammerstad, Clackamas County Commissioner
Governor John Kitzhaber
Senator Bill Kennemer
Representative Jane Lokan
Representative Larry Sowa

Petition 1

Metro has approximately \$4.2 million available to buy land for Regional Use Greenspaces in the Cooper Mountain Area. Two sites are currently under consideration for purchase: Site #1 (approximately 30-40 acres), proposed by a group of citizens living adjacent to the site, or Site #5 (approximately 400-500 acres), supported by Metro Staff/Consultants. There is not enough money to purchase both sites. We, the undersigned, feel that Site #5, as the larger and more accessible of the two sites, would be the most prudent use of public funds and offer the most practical choice to preserve natural habitat, as well as to accommodate access by the public.

Signature

Name (Printed)

Address

Nancy L. Atkins Nancy L. Atkins 15710 SW Bobwhite Cir
Beaverton, OR 97007

Tommy M. Atkins Jr Tommy M. Atkins Jr 15710 SW Bobwhite Cir
Beaverton, OR 97007

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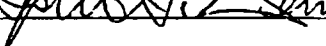
Address

16310 SW Falcon Drive

16210 SW FALCON DRIVE

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Address

Signature	Name (Printed)	Address
	Spiro G. Demas	16255 S.W. Turtle dove Ln Beaverton, OR 97007
	Dena Demas	16255 S.W. Turtle dove Ln. Beaverton, OR 97007

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[illegible]

Petition 1

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Signature

Name (Printed)

Address

Signature	Name (Printed)	Address
Elizabeth Patricia Becker	ELIZABETH PATRICIA BECKER	16390 SW Tuxedo Lane
Hal C. Becker	HAL C. BECKER	"

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Signature

Name (Printed)

Address

Des. of the Sp. of the
Int. B. 131

Dorothy Buckley
JAMES F. BUCKLEY

10505 S.W. 16th Ct.
Beaverton, OR 97007

John W. Foster

JOHN MEHOFF

3360 SW 121st AVE BEAVERTON, OR 97005

Jason M. Smith

Dariusz Michol

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Signature

Name (Printed)

Address

James M. Crosby

Jeff T. Crasno

10700 SW Heron Cir. Beaverton, OR 97007

Carmen M. Crossno

10700 Sw Heron Cir. Beaverton OR 97007

Petition 1

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Signature

Name (Printed)

Address

Cam Henderson CAM HENDERSON 16360 SW NIGHTHAWK DR

BEAVERTON OR 97007

Andree Henderson. ANDREA HENDERSON 16360 SW Night Hawk Dr.
Beaverton, OR 97007
Butn, OR 97007

Butn. OR 97007

Petition 1

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Signature

Name (Printed)

Address

Rex G

Rex G. Markley

Rex G. Markley

16470 SW Nighthawk Dr
Beaverton 97007

Petition 1

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Name (Printed)

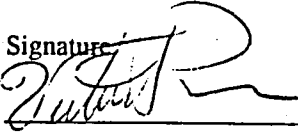
Address

Name (Printed)	Address
Mark A. Peet	10140 SW. Shearwater Loop
Judith T. Peet	10140 SW. SHEARWATER, 2 LD

Petition 1

Metro has approximately \$4.2 million available to buy land for Regional Use Greenspaces in the Cooper Mountain Area. Two sites are currently under consideration for purchase: Site #1 (approximately 30-40 acres), proposed by a group of citizens living adjacent to the site, or Site #5 (approximately 400-500 acres), supported by Metro Staff/Consultants. There is not enough money to purchase both sites. We, the undersigned, feel that Site #5, as the larger and more accessible of the two sites, would be the most prudent use of public funds and offer the most practical choice to preserve natural habitat, as well as to accommodate access by the public.

Signature



Name (Printed)

Wilton Prince

Address

11165 SW CHICKADEE TERRACE
BEAVERTON OR 97007

Tanyah Prince

TANYAH Prince

11165 SW CHICKADEE TERRACE
BEAVERTON OR 97007

Petition 1

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Signature

Name (Printed)

Address

Carol M. Snyder Carol M. Snyder 10445 SW Shearwater Ln. Bttn, I.
" " " 9700-

[illegible]

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Beaverton, Ore.
17520 SW Sugar Plum Lane

Beavercreek

4/7/96

112196-36

RESOLUTION NO. 96-40

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF OREGON CITY TO FULLY PARTICIPATE IN AND SUPPORT THE CONCEPT OF THE METRO URBAN RESERVE AREAS AS RECOMMENDED BY THE EXECUTIVE OFFICER MIKE BURTON DATED SEPTEMBER 3, 1996.

WHEREAS, the City and its staff have participated with Metro in defining the areas beyond the existing Urban Growth Boundary the could be reasonably serviced for future development; and

WHEREAS, the City recognizes the need of funds and assistance from Metro, the state and federal agencies to support the needed infrastructure and services for the addition of approximately one-third of the growth for the Metro region; and

WHEREAS, the City is implementing financing systems whereby new development mitigates impacts of growth to the existing public facilities by paying its fair share; and

WHEREAS, the City supports the concept of having a Jobs-to-Housing balance that will help reduce the City tax rate and decrease the reliance on commuting to other jurisdictions; and

WHEREAS, the City agrees that Urban Reserve Areas should be Master Planned prior to annexation as proposed by Executive Officer Mike Burton; and

WHEREAS, the City is interested in the possibility of Master Planning lands in the Urban Growth Boundary prior to annexation to promote integrating this concept in the development process; and

WHEREAS, Beavercreek is a recognized community and where the City of Oregon City supports and will help sponsor this goal. The City will support this area's incorporation as a separate city or annexation to Oregon City, whichever the Beavercreek community chooses.

NOW, THEREFORE, BE IT RESOLVED by the City Commission that the City of Oregon City shall fully participate in refining and implementing the Urban Reserve Area proposal stated as by the Metro Executive Officer by promoting the following:

Refinements to the Executive Officer Recommendation, as attached in Exhibit A:

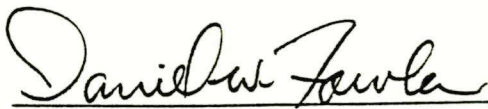
- To promote safety and efficient means for the provision of services, include all existing roads and/or rights-of-ways in the Urban Reserve Area where they abut an urbanizable parcel.
- The Urban Reserve Boundary shall follow existing property lines. The City strongly supports the preservation of water resources and steep slopes. The buildable lands area should stay about the same as in the Executive Officer Recommendation, but, the over all area may be larger.

- Existing subdivisions that are split by the proposed Urban Reserve Boundary need to include the entire subdivision, where practicable.
- Lands in the Urban Reserve Study Area No. 29 should be expanded from Mr. Burton's proposal to include the majority of the lands identified in the original area of consideration.

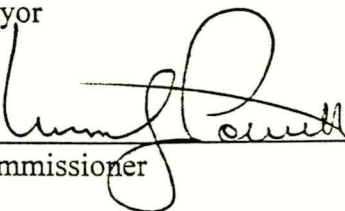
Implementation Goals:

- The City will amend the Comprehensive Plan to include the Urban Reserve Area, based on state and Metro policies;
- The City will implement policies that will protect and maintain natural features, water resources, steep slopes, and historic sites, through requiring the use of planning tools such as density transfers and Planned Developments.
- The City will maintain an open dialogue with the community on the revisions that will be made to the Comprehensive Plan relating to Urban Reserves. This will be done through communication with the Neighborhood Associations, Citizen Planning Organizations, the local papers, and at public hearings to provide full opportunity for public participation.

Adopted, signed, and approved this 6th day of November, 1996.

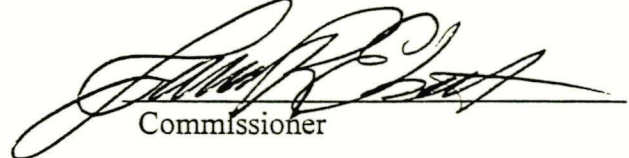


Mayor



Commissioner

Commissioner



Commissioner



Commissioner

Comprising the City Commission
of Oregon City, Oregon

Metro
Urban Reserve
Citizen Input Form

Beavercreek
4/7/96
112196-37

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: Diane Gissel

Address: 16889 S. Carus Rd

City, State & Zip: Beavercreek, OR 97004

Phone Number: 632-4232

Address or Location of Parcel: Beavercreek

Urban Reserve Study Area Number(s): 2b ~~2b~~ Last lot.

Briefly summarize your concern or questions:

My parcel has a portion of it within the study area. This is silly; either take it or leave it. My preference would be leave it out of the study area. I moved out of the city to get away from the bureaucrats, because after the influx of people come issues that no one wants to deal with. All that's happening is the developer's want more money, while I'm not ready to sacrifice my peace.

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

Unfortunately, there is not enough money to put infrastructure in place first then plan for houses. We tend to do the opposite first and there is no money to do the infrastructure.

Metro
Urban Reserve
Citizen Input Form

112196-38

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: Gerald Haram

Address: 22464 S. Evergreen Dr.

City, State & Zip: Beavercreek Or. 97004

Phone Number: 632-7670

Address or Location of Parcel: _____

Urban Reserve Study Area Number(s): _____

Briefly summarize your concern or questions:

Beavercreek should not be included as an urban reserve. Look at the map. The Beavercreek area is far south. Inclusion would sprawl the boundary way South. There are no jobs out here! This would require more commuters on an already taxed 213 bypass. The @ hand turn onto Beavercreek Rd. is currently very dangerous as cars are backed up onto the freeway lanes. This is a serious accident waiting to happen. Finally, the air pollution out here is terrible + will only get worse.

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

112196-39

Beaver creek
11/27/96

**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: JANICE L. ENSLEY
Address: 22170 S. BEAVERCREEK Rd
City, State & Zip: BEAVERCREEK, OR. 97004
Phone Number: 503-632-6831
Address or Location of Parcel: 26 (as above)
Urban Reserve Study Area Number(s): 26

*I am against
Urban expansion
into Beaver creek*

Briefly summarize your concern or questions:

I have many concerns all of which will impact livability in this area. Pollution is a big factor out here both air and noise. The roads can't handle any more traffic. Schools are already over crowded. There are no jobs in the area. (Clackamas County sees to that!) However, I don't want an industrial Park in my neighborhood either. also, bringing utilities out here would be too expensive!!

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

I live on a hill. and there is a varying water table. I don't want to see the water table all over polluted and more like it.

112196-40

Beavercreek
Testimony
11/9/98

Metro
Urban Reserve
Citizen Input Form

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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: DOUG NEELEY

Address: 712 12th St

City, State & Zip: Oregon City Oregon 97045

Phone Number: 650-5035

Address or Location of Parcel: _____

Urban Reserve Study Area Number(s): _____

Briefly summarize your concern or questions:

→ Need for Oregon City to increase housing density to keep pressure off boundary.

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

METRO COUNCIL HEARING
@ BEAVERCREEK SCHOOL
NOV. 7, 1996

GARY C. HARTT
17964 S. WINDY CITY RD.
CLARKES DISTRICT
MULINO, OR 97042
632-6955

I AM IN OPPOSITION TO THE EXPANSION OF THE METRO BOUNDARY TO THE BEAVERCREEK AREA. WHILE I REALIZE THAT SOME FUTURE EXPANSION IS NECESSARY, I FEEL IT IS MORE LOGICAL TO INCLUDE ALL LAND NORTH OF THE WILSONVILLE AND CLACKAMAS RIVERS BEFORE ANY CONSIDERATION IS GIVEN TO FARM AND FOREST LAND, SOUTH OF THESE NATURAL BOUNDARIES. THE MOST LOGICAL EXPANSION IS THE STAFFORD AREA BECAUSE OF THE INTERSTATE (I-205) WHICH BISECTS IT. THE FOLLOWING POINTS SHOULD BE ADDRESSED AND STRESSED:

TRANSPORTATION ISSUE

ALMOST ALL OF THE PEOPLE IN THE AREA SOUTH OF OREGON CITY COMMUTE NORTH THROUGH OREGON CITY VIA THE BYPASS AND THEN ONTO I-205 OR MCGLOUGHLIN. NO LAND IS ZONED FOR INDUSTRIAL OR COMMERCIAL USE EXCEPT FOR SOME VERY SMALL PARCELS WITH GRANDFATHER PROVISIONS. ALL THE JOBS ARE LOCATED IN PORTLAND, LAKE OSWEGO, WILSONVILLE AND THE CLACKAMAS INDUSTRIAL AREA. MOST JOBS IN OREGON CITY ARE RELATED TO CITY, COUNTY, SCHOOL OR RETAIL ACTIVITIES. WE HAVE GRIDLOCK ON BEAVERCREEK RD. NORTH OF HENRICI RD. INTERSECTION DURING RUSH HOUR. IN NON-RUSH HOURS IT IS GRIDLOCK FROM CLACKAMAS COMMUNITY COLLEGE ENTRANCE ON BEAVERCREEK RD. TO THE NORTH. CLACKAMAS COUNTY'S ROAD IMPROVEMENT PLANS CALL FOR 5 LANES ON BEAVERCREEK TO HENRICI BUT ITS PRIORITY IN THE COUNTY PLAN IS BELOW OTHER BOTTLENECKS AROUND THE CLACKAMAS TOWN CENTER/SUNNYSIDE RD. AREA AND HWY 212/224 INTERSECTION WITH I-205. IN ADDITION I AM SURE THERE ARE MANY OTHER HIGHER PRIORITY ROAD IMPROVEMENTS.

POLLUTION ISSUES

BECAUSE OF THE PREVAILING WINDS, ALMOST ALL OF THE NORTH WILLAMETTE VALLEY POLLUTION DUMPS OR IS CONCENTRATED AROUND CARUS SCHOOL. WHILE I AM NOT ABLE TO QUOTE THE LEVEL, PLEASE CONTACT DEQ THEY HAVE THE STATISTICS. (FYI, THERE WAS AN ARTICLE IN THE OREGONIAN SEVERAL MONTHS AGO, QUOTING DEQ THAT THE CARUS AREA HAS THE HIGHEST AIR POLLUTION LEVELS IN THE PORTLAND METRO AREA. IS IT LOGICAL TO PLACE HOMES WITH KIDS IN SUCH A HIGH POLLUTION AREA?

SCHOOL ISSUES

OREGON CITY VOTERS HAVE VOTED DOWN ALL RECENT BOND ISSUES. THE SCHOOLS ARE CROWDED AT PRESENT ENROLLEMENT. THERE HAVE BEEN 17 MAJOR DEVELOPMENTS APPROVED AND BUILT IN THE LAST YEAR. THE SCHOOL SYSTEM HAS YET TO EXPERIENCE THE FUTURE ENROLLMENT NEEDS FROM THESE DEVELOPMENTS.

CONCLUSION

EVEN IF THE SCHOOL AND TRANSPORTATION ISSUES CAN BE RESOLVED, THE AIR POLLUTION ISSUE CAN NOT BE OVERCOME. I STRONGLY URGE YOU TO CONSULT WITH DEQ BEFORE YOU CONSIDER ANY SOUTHERLY EXPANSION OF THE UGB.

THANK YOU FOR YOUR TIME!

METRO HEARING- ADITONAL ISSUES

=====

CUTURAL AND POPULATION ISSUES

=====

MANY LO/WEST LINN RESIDENTS SUPPORT AND ATTEND THE PERFORMING ARTS IN PORTLAND, WHEREAS BEAVERCREEK AREA RESIDENTS CONSIDER THE "BUST" AS THEIR CUTURAL EVENT. MOST NIGHTS WHEN THE LAKE OSWEGO YUPPY CROWD IS ATTENDING THE OPERA OR SYMPHONY, THE TYPICAL BEAVERCREEK FAMILY IS WATCHING TV MAYBE WITH A 6-PACK OF BEER. THE NET RESULT IS THAT BEAVERCREEK FAMILIES MAKE MORE BABIES. THIS CONTRIBUTES TO THE WORLD POPULATION EXPLOSION. WHEREAS IF THESE ADDITIONAL BEAVERCREEK FAMILIES ARE PLACED IN STAFFORD, THEY WILL ACQUIRE ADDTIONAL CULTURE AND WITH THE HUSBAND AND WIFE WORKING 2 JOBS, THERE WILL BE LESS TIME AVAILABLE TO MAKING BABIES.

PRISON ISSUE

=====

IF YOU DECIDE THAT STAFFORD IS NOT AVAILABLE FOR HOUSING, HOW ABOUT A 3000 BED MAXIMUM SECURITY PRISON. IT WOULD BE CENTRALLY LOCATED FOR THE TRI-COUNTY AREA.

GARBAGE TRANSFER STATION

=====

IF NOT A PRISON, THEN HOW ABOUT A GAREAGE TRANSFER STATION TO HANDLE WASHINGTON COUNTY'S GARBAGE INSTEAD OF AT THE OVERUSED OREGON CITY SITE.

112196-42

DAVID P. MILLER
16415 NW Brugger Road
Portland, OR 97229

(503) 614-8384

November 20, 1996

Ms. Susan McLain, Commissioner
Metropolitan Service District
600 NE Grand Avenue
Portland, OR 97232-2736

Re: Urban Reserve Decision

Dear Ms. McLain:

You may recall that we met recently met at the CPO#7 meeting on November 4, 1996. At that time you distributed information about Metro's listening posts meetings with regard to the Urban Reserve issue. Since I may not be able to attend any of the meetings, I am writing this letter to you to set forth my thoughts and request your assistance.

I understand that Metro is proceeding on the theory that all URSAs will become urban reserves unless they are removed prior to the decision date by a motion of one commissioner supported by votes of three other commissioners. This seems like a highly unusual procedure for including areas that are supposed to be under study. Putting that aside, however, I request that you move to exclude Site #36^{*} or at a minimum the EFU portions of Site #36 from becoming an urban reserve for the reasons set forth below. A map of Site #36 is attached for your reference. It is in the Bethany area and consists primarily of EFU lands north of Springville Road and Rock Creek Community College. I live just north of the URSA boundaries in an EFU zone.

^{*}
now site # 65

The reasons for this request are:

1. Much of the URSA is in EFU which means it should be very low on the priority for being included in urban reserves.
2. In fact, the EFU land in the URSA is for the most part under cultivation or in wood lots. Crops cultivated include an extensive amount of nursery stock which is grown in the Rural Residential portions of the URSA north of Springville along Kaiser Road, and wheat, oats, barley and hay grown by farmer Clifford Joss who farms his own land and leases numerous parcels of land, mostly within the URSA, and including my land outside of the URSA. Attached is a copy of a letter from the USDA Farm Service Agency indicating the land farmed by Mr. Joss and the crops involved. The point is that most of the URSA is highly productive farmland which is actually under cultivation; such land is supposed to have the lowest priority for inclusion in an urban reserve, as I understand it.
3. There has been very rapid development of homes within the UGB area adjacent to this URSA. This development is still not completed. The end result will be tremendous additional pressure on the country road system of the area and the school system, which I understand is already overloaded at the elementary level. This area is considerably north of the mass transit corridor and is not close to the city limits of Portland, Hillsboro or Beaverton. All homes which might be constructed in the URSA would need access to the Sunset Highway and existing access roads, though recently improved are, if not already overloaded, in the process of becoming so from existing development. Washington County does not intend to provide urban services, and even if it did, Measure 47 would drastically impair its ability to do so.
4. Since the current URSAs were adopted, the high technology industry has slowed down and with it the growth rate of population in Oregon according to recent figures. Additionally, Measure 47 has recently been adopted by the voters with a potential dramatic impact on funding for government services. It would be erroneous to proceed ahead with previously studied URSAs now that the crucial study factors just mentioned have changed. Further study is needed as to all URSAs in light of these developments.

Again, I request that you move to delete this entire URSA, or the portions in EFU or that are currently under agricultural production in rural residential zones and seek the support

Ms. Susan McLain
November 20, 1996
Page 3

of other commissioners to exclude this URSA from the final decision. The citizens in the area have already taken the brunt of incredible development over the last three years and some time is needed to absorb the impact and evaluate whether further expansion of the UGB in this area is appropriate.

Respectfully submitted,



David P. Miller

Enclosures

cc: (w/encls.)
CPO#7 Steering Committee
Mr. Mike Burton
Mr. Jon Kvistad
Ms. Ruth McFarland
Mr. Don Morissette
Mr. Ed Washington
Mr. Rod Monroe
Ms. Patricia McCaig
Mr. Alexis Dow

Regional Land
Information SystemPreliminary
URSA'SFrom Metro Council
1-4-96 Approval

Urban Reserve Study Area

Specific Study Area

Urban Growth Boundary

number	=	36
value	=	36
ugbmin	=	0
ugbmean	=	868.518
trans	=	13.222
cendist	=	6.454
terrain	=	6.880
fldacre	=	45.107
ripacre	=	16.216
majorsoil	=	3
bestsoil	=	2
exacre	=	237.962
exland	=	3
efuacre	=	285.492
acres	=	540.67

600 NE Grand Ave
Portland, OR 97232-2736
(503) 797-1242

UNITED STATES DEPARTMENT OF AGRICULTURE
FARM SERVICE AGENCY
WASHINGTON COUNTY FSA OFFICE
1080 SW BASELINE SUITE B-3
HILLSBORO, OR 97123-3823
(503) 648-3174

November 4, 1996

DAVID F MILLER
16415 NW BRUGGER RD
PORTLAND, OR 97229

Farm Number 4834

Dear DAVID F MILLER:

You are listed as either an Owner or a Producer on a Production Flexibility Contract (Form CCC-478) for the Farm Number shown above. For FY 1997, the Contract shows the following Crops, Producers, Producer Payment Shares, and Advance Payment Flags:

CROP	PRODUCER	1997 PAYMENT SHARE	ADVANCE PAYMENT FLAG
WHEAT	DAVID F MILLER	.0000	N
WHEAT	EDDIE R WANER	.0000	N
WHEAT	CLIFFORD JOSS	.0000	N
WHEAT	GAZA BURGER	.0000	N
WHEAT	REUBEN GERBER	.0000	N
WHEAT	PAUL C DIEGEL	.0000	N
WHEAT	GRACE HEXOM	.0000	N
WHEAT	ALICE JOSS EST	.0000	N
WHEAT	C A CHRISTENSEN	.0000	N
OATS	REUBEN GERBER	.0000	N
OATS	PAUL C DIEGEL	.0000	N
OATS	GRACE HEXOM	.0000	N
OATS	ALICE JOSS EST	.0000	N
OATS	C A CHRISTENSEN	.0000	N
OATS	GAZA BURGER	.0000	N
OATS	CLIFFORD JOSS	.0000	N
OATS	EDDIE R WANER	.0000	N
OATS	DAVID F MILLER	.0000	N
BARLEY	DAVID F MILLER	.0000	N
BARLEY	EDDIE R WANER	.0000	N
BARLEY	CLIFFORD JOSS	.0000	N
BARLEY	GAZA BURGER	.0000	N
BARLEY	REUBEN GERBER	.0000	N
BARLEY	PAUL C DIEGEL	.0000	N
BARLEY	GRACE HEXOM	.0000	N
BARLEY	ALICE JOSS EST	.0000	N
BARLEY	C A CHRISTENSEN	.0000	N

The contract shows the following crops and shares are UNDESIGNATED:

WHEAT	1.0000
OATS	1.0000
BARLEY	1.0000

Please review the following Attachments for information concerning the Farm Program and instructions concerning the above share information.

Sincerely,

s/ RALPH E MEYER

RALPH E MEYER
County Executive Director
WASHINGTON COUNTY FSA OFFICE

November 21, 1996

**Metro Councilors
Metro
600 N.E. Grand Avenue
Portland, Oregon 97232-2736**

Subject: URSA Map 64

Dear Councilors:

We request that the urban proportions of Map 64 URSA (part) be designated an urban reserve area. Attached, please find a map which indicates the approximate boundaries we propose. The tax lots marked with "V.R." are the properties that we own and live on.

When we moved the West Union in 1960, it offered the conveniences of grocery store, butcher, restaurant, gas station, and feed-hardware store. Though the mix of goods and services has changed over the years, West Union continues to be an important resource to the suburban and rural residents for many miles around.

Currently, hundreds of acres adjacent to West Union, within Hillsboro's city limits, are planned for residential and industrial development. Alone, the residential development of the 200 acre "Seaport" property could bring 10,000 people within walking distance of the West Union Road - Cornelius Pass Road (WU-CP) corner.

As the surrounding area develops, we feel that West Union should be within the UGB so that it can develop in response. The parcels we own are less and less desirable rural home sites as vehicle trips increase on West Union and Cornelius Pass roads.

There are many factors that support the inclusion of URSA 64 (part) within the reserves.

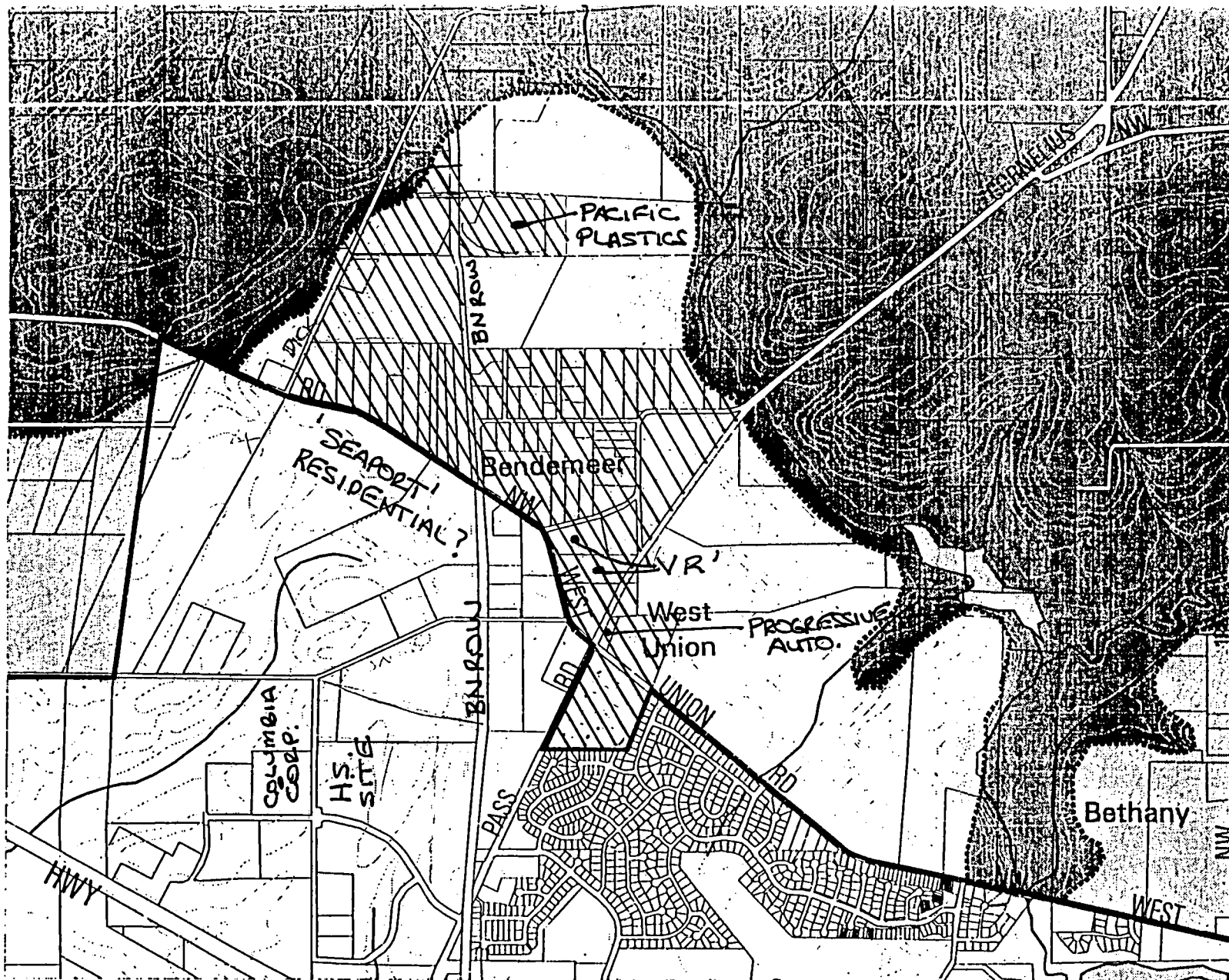
- Water, natural gas, and bus service already present.**
- 40+ acre Hillsboro High School site within walking distance of WU-CP corner.**
- URSA 64 (part) already urban in character. A relatively dense road system and city water to some parcels.**

- Trip miles can be greatly reduced for present and future sub-division residents by small town center at WU-CP corner.
- Inclusion of URSA 64 (part) would provide approximately 200 acres of exception lands (priority 1) for reserves.
- City of Hillsboro has declared an interest in annexation when area comes into UGB.
- Major north/south and east/west transit corridors exist.
- Targeted rails to trails corridor through URSA (marked on map as B.N. ROW).
- We estimate that by removing most of the agricultural land from URSA 64, its matrix score would increase from 42.5 to 70.5.
- Located within URSA 64 since 1972, is Pacific Plastics, an important employer of 150 people. They need urban services.
- Located within URSA 64 is Progressive Automotive, who has difficult land use issues due in part to being an urban use outside UGB. They need urban services.

We are a large family with deep roots within the West Union community. We have a business, Columbia Corporation, located within 1/4 mile of the WU-CP corner. We also have a 300+ acre farm on Jackson School Road. We support the state goals which strive to preserve farm land and avoid urban sprawl. To that end, we ask you to direct Metro staff to re-score URSA 64 sans its agricultural land and give it priority for inclusion in the reserves based on its revised score.

Thank you for your considerations.

Scott Van Raden
Chris Van Raden
David F. Van Raden
Heidi R. Yager
Jeff Van Raden
Patty Van Raden
Susan Morgan
Carissime B. Van Raden
F. F. Van Raden



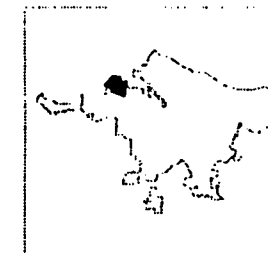
Urban Reserve Study Areas

Adopted By
Metro Council 2-8-96

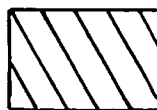
- This Map's URSA
- UGB
- Other URSA's
- Outside UGB and URSA's
- Specific Study Area
- Urban Growth Boundary

MAP #64

Acres EFU Acres
615.91 400.000



600 NE Grand Ave
Portland, OR 97231-2736
(503) 797-1742



— N

**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 21, 1996

Metro Service District
600 NE Grand Ave
Portland OR 97232

Re: Urban Reserve Study Area #64

Dear Chairman, John Kristad and Members of the Council:

Since appearing at the first meeting of the Metro Council, solely on behalf of Pacific Plastics relative to Urban Reserve Area #64, we have had an opportunity to review the entire exception area and have been contacted by other owners, including the VanRadens. We wish to draw several items to your attention that effect this study area and make it a much more viable candidate for inclusion in the Urban Reserve Area, other than many other areas scoring much higher that you have been looking at. The reasons for my assertion are as follows:

1. As you can see from the aerial photograph that we are submitting this evening at the meeting, a substantial portion of this area is all ready committed to urban uses and is exception lands within the Statewide definitions. There is a small strip mall in the area with a substantial grocery store and office buildings, as well as beauticians and realtors.
2. On another side of the intersection, we have an automobile maintenance shop with numerous bays. In fact the shop is as large as any automobile shop that I have seen in the Beaverton area and is privately owned and operated and not a franchise operation. At the southwest center of the intersection, there is a newly developed farmer's market selling products of all sorts and descriptions.

To exclude this area from the Urban Reserve Boundary Area, while including other areas that are currently totally committed to agriculture production, makes very little sense.

3. In addition to the commercial centers at the intersection and north of the intersection at Cornelius Pass and West Union, there is a sizable number of homes located on small parcels with developed streets and lotting patterns similar to any other residential city development.

4. Lastly, lying just two parcels separated to the north, you have the fully developed 10 acre tract of Pacific Plastics with 20 additional undeveloped acres, which has been in existence on the site for in excess of 25 years, which has been fully and totally developed for the production of plastic pipe of all kinds. The amount of investment in this site alone exceeds \$4,000,000.
 - a. In addition, this site is one of the very few sites in the Hillsboro region that is serviced by rail line, which is needed for the further development of the Pacific Plastics business operation. There has been some discussion among counsellors that this line is to be abandoned for the Rails to Trails program and our client's investigation with the railroad, itself, indicates that there is no plan to cease service to the Pacific Plastics site so long as the Pacific Plastics site remains in operation.

The largest reason that Area #64 has been downgraded in the point numbers given by the executive director seems to be the large amount of agricultural land in the area, most of which lies principally on the north side of West Union and east of Cornelius Pass Road, with one small piece lying north of the Pacific Plastics plant itself.

We are suggesting to the Metropolitan District Council that in the event you do not see fit to include the whole of Area #64, within the Urban Reserve Area in your final decision, that one option open to you is to leave out some of the agricultural land on the northeast side of the intersection of West Union and Cornelius Pass and also an option to exclude that property lying north of Pacific Plastics. That would have the following effect:

- A. It would preserve most of the agricultural land within the study area, while bringing in only those small parcels of ground, many of which are already surrounded by development.
- B. It would bring into the Urban Reserve Area those areas that are all ready committed to urban use and who have the need for urban services, "exception lands and surrounding property".
- C. It would preserve one of the very few remaining industrial sites with railroad access that remains in the Hillsboro industrial base.

Such a modified proposal would be met with strong endorsement by almost all of the owners and residents within the Study Area #64, and is quietly supported by the City of Hillsboro, itself, and would withdraw and nullify most of the opposition from farmers and agricultural associations in the region.

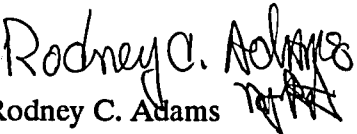
In closing, the community of West Union is one of the oldest rural/urban communities in Washington County. To totally and completely ignore its existence while forming these urban reserve study boundaries is a true mistake. We urge your inclusion of this Area #64 into the Urban Reserve Area for inclusion by Metro.

Metro Service District
November 21, 1996
Page 3

I wish to have this letter submitted into evidence at the hearing on November 21, 1996, and will try desperately to have someone present it formally, as I give my apologies for being injured on the morning of November 19th and find myself dictating this from a hospital bed.

Very truly yours,

ADAMS, DeBAST, HELZER, McFARLAND,
RICHARDSON & UFFELMAN


Rodney C. Adams

RCA:mm

cc: Pacific Plastics
VanRaden

Metro Testimony

11/21/96

Metro has heard from many of us repeatedly over the last year about our many concerns regarding the expansion of the urban growth boundary and not only just in the Stafford triangle. While the many financial and quality of life problems have been stated, lack of ~~money~~ ^{money} available for roads, sewers and all the necessary contributions required of Lake Oswego. Our police and fire department are struggling to take care of us now. Especially with the passage of "47" the City financial ability to serve our needs is already diminished. It is understandable the ~~the~~ property owners are eager to realize the financial rewards from the vast appreciation of ~~their~~ the value of their property. "This is just like winning the lottery to them. We who make up the City cannot pay for what expansion will need. If all these items were not enough - our rainstorm should certainly be a wake up call for what will happen if this proposed expansion occurs. Tualatin, Beaverton and all around us experience partly

serious flooding after just one day of winter style rain. Already what are we looking forward to this winter. What is going to happen to us with the Stuffer area built up. Many of our citizens will be harmed possibly lose their lives - just so farmers become wealthy and bulldoze make money - This is not the answer to the housing needs of our town - We ask our metro leaders to balance all of our needs and find a better solution -

Thank you -

Dorothy M. Rogers
 Chair Palisades Neighborhood Association
 19211 SW Robb Pl
 Lake Oswego, OR 97035
 503 635 4938

11/21/96-46

**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: Beatrice E. Ellis

Address: 410 S. Bergis Rd

City, State & Zip: Lake Oswego OR 97034

Phone Number: 636-4485

Address or Location of Parcel: same

Urban Reserve Study Area Number(s): Stafford A

Briefly summarize your concern or questions:

The history of this area is that it was a successful truck farm for many years. On our property is a huge dairy barn; barbed wire fences crisscross the land; enormous farm machinery pieces (rakes, plows, team yoke) were found in the blackberries and lower barn.

The soil has been tested by an independant party, and recorded. On our property it is Cascade Silt loam, class II, ideal for berries, orchard, perennials, Douglas Fir. In fact it has produced richly for us during our 25 years of living there (vegetables, perennials, Christmas trees, holly which we sell locally) without irrigation or fertilization.

Please look beyond the self-interest of the few to protect EFU-20 lands for future generations. Only 1% of our farmable soil remains available. If you have any additional questions please feel free to contact John Donovan at Metro 797-1871.

Urban Reserve Selection Criteria

Oregon state law requires Metro to consider specific criteria or factors in deciding which lands outside the Urban Growth Boundary to designate as urban reserves. The following criteria, which address factors 3-7 referred to in the Urban Reserve Rule, were used to evaluate the urban reserve study areas (URSA):

Public Facilities and Services (Factor 3):

- ❖ **Utility Feasibility** - the relative cost of delivering urban water, sewer and stormwater services to each URSA.
- ❖ **Road Network** - an analysis that compares existing local and regional roadway network in the URSA to the required road network for future urbanization.
- ❖ **Traffic Congestion** - estimates the relative lack of congestion of the primary streets, highways and freeways serving the area after additional improvements, as described in the Regional Transportation Plan.
- ❖ **Schools** - examines accessibility to public schools by evaluating walking distance to elementary schools, middle schools and high schools, as well as school-owned property.

Maximum Efficiency of Land Uses (Factor 4):

- ❖ **Efficiency Factor** - estimates how much of each URSA, after removing environmentally significant land, is likely to be available for urban development. This factor takes into consideration development limitations (land locked parcels, partially vacant parcels, small parcels, and steep slopes under 25% that inhibit development).
- ❖ **Buildable Lands** - analysis of acres considered developable in each URSA after considerations are made for environmental constraints, efficiency factors and for future roads, parks, schools and other public facilities.

Environmental, Energy, Economic and Social Consequences (Factor 5):

- ❖ **Environmental Constraints** - evaluates the percentage of land in each URSA that is constrained by slopes over 25%, floodplains, wetlands, riparian corridors and flood prone soils.
- ❖ **Access to Centers** - uses the distance along public rights-of-way to the central city, regional center and town centers, the three centers identified in the 2040 Growth Concept, to evaluate the energy needs of each URSA.
- ❖ **Jobs/Housing Balance** - estimates the balance of jobs to housing for the URSAs using year 2015 population and employment forecasts.

Retention of Agricultural Lands (Factor 6):

- ❖ **Agricultural Retention** - analyzes land and soil types contained in each URSA and classifies land using priorities set out in the state's Urban Reserve Rule for urbanization and agricultural retention.

Agricultural Compatibility (Factor 7):

- ❖ **Agricultural Compatibility** - assesses lands adjacent to each URSA for existing or potential agricultural lands and whether nearby natural features help or hinder future agricultural use of the land.

9/21/96

To: Metro

From: First Addition Neighbors Coordinating Committee
(ratified position, October 6, 1996)

Re: Stafford Triangle Urban Reserves

First Addition Neighbors Association (FAN) is one of Lake Oswego's oldest neighborhood associations, formed in 1974. Our neighborhood was platted at the turn of the last century; it consists of diverse housing on relatively small lots and is adjacent and to the North of the east end downtown, commercial district of Lake Oswego. The FAN association has worked for over two decades to preserve the character, safety and livability of the neighborhood. FAN is old enough to be able to identify the changes and effects of two decades of intense development in Lake Oswego.

FAN opposes Urban Reserves in the Stafford Triangle for the following reason.

1) It is unfair to burden residents with the huge costs of the infrastructure required for development of that area. Our residents are mostly retired people and young families with modest and fixed incomes.

2) Any development (in or out of the UGB) will increase the already intolerable traffic, air pollution and water management problems on Highway 43 which are currently negatively impacting FAN.

The North Stafford Area Study Task Force represents nearly all stake holders in this issue. We support their recommendation to *not* amend the 2040 Growth Concept Map and to *not* add any land to the North Stafford Area as Urban Reserve. If the Metro Council ignores their recommendations we have no other recourse than to pressure our city government, in whatever possible ways, to block any further unacceptable development.

We believe that regional planning can only be successful in full partnership with all stake holders.

Thank you for your consideration of this testimony

Jim Bolland, FAN Chair

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We believe that regional planning can only be successful in full partnership with all stake holders.

Thank you for your consideration of this testimony

Jim Bolland, FAN Chair

To the Metro Council:

I request that areas 65 and 66 be deleted from the urban reserves.

*** Area 66 in Mult. county is almost all EFU

Has been requested not to be included by Mult. County.

Would be the only urban area in that part of the county.

Would be in the Portland School Dist. so hundreds of school

children would have to bus to Portland Schools.

Begin to pinch off the separation between the Portland urban area and the Beaverton urban area.

Further erode the longterm viability of the rural area in Mult. County.

*** Area 65 in Washington County is over half EFU.

Is cut through by a fault line.

Has been recommended not to be added to the urban Reserves by the Wash. County Commissioner for the area, in part because there is no transportation facilities available or planned.

Is miles from light rail.

There is no additional school capacity or finances available.

Would destroy valuable ag land and business in the area.

(One nursery grower in the area ships 750,000 plants a year).

Encourages high urban densities away from established urban Town Centers.

The local Citizen Participation Organization has sent letters to Metro opposing this.

In general the people have made it known (Ballot Measure 47) they don't want higher taxes to provide services to remote corners of the UGB. I ask the Council to remove these areas from consideration.

Greg Malinowski

Respectfully, Gregory Malinowski

11/2/96-49

Lakewood Bay Neighborhood Association
Lake Oswego, Oregon

November 16, 1996

Mr. Mike Burton
Metro Regional Center
600 N.E. Grand Ave.
Portland, OR 97232-2736

Re: Urban reserve study areas: Stafford Triangle

Dear Mr. Burton:

As the representative from the Lakewood Bay Neighborhood Association I ask that you not include the Stafford Triangle in the areas considered to increase the urban growth boundary. We have several reasons for this opposition.

The first reason concerns the impact of addition traffic and transportation problems. Our neighborhood is bordered by McVey/Stafford Road and Highway 43. These roads are near capacity according to the County of Clackamas. To handle the excess traffic that would be created from urbanization of areas 31,32 and 34 much road improvement would be needed. We do not feel that there are funds available to pay for a project of this size. This is especially true with the passing of Measure 47. Additionally the I-205 freeway from the I-5 interchange through Oregon City is very congested during peak travel times. There are accidents daily in this area causing further problems to travel along this corridor.

The citizens in our neighborhood are also very concerned about the projected future growth and that impact on the Lake Oswego School District. According to the criteria listed for the various areas - proximity to a school was used to rate each area. While it is true that there are schools nearby- nowhere in your study did we see capacity numbers listed for the schools. Capacity was not considered. We feel that there are many areas besides the Stafford Triangle that have little or no room for expansion without having to build new elementary and secondary schools to house

the increase in population. There is no funding for such building in any city in this state. Again ballot Measure 47 has placed more limits on funding and the availability of monies.

We urge you to reconsider adding the Stafford Triangle to the Urban Growth Boundary. We are not convinced that the urban growth boundary needs to be expanded at all.

Sincerely,

Vicki Clark
Lakewood Bay Neighbor Association
676 Ridgeway Road
Lake Oswego, OR. 97034



11/21/96-50

AUDUBON SOCIETY OF PORTLAND

Inspiring people to love and protect nature.

11/22/96

Jon Kvistad, Chair
and Metro Council
600 NE Grand
Portland, OR 97232

Dear Chair Kvistad and Councilors,

I am submitting this testimony on behalf of the Audubon Society of Portland and our more than 8,000 members who reside throughout the Portland-Vancouver metropolitan region. As you know, PAS has been actively involved in Metro's Region 2040 planning process since its inception and will continue to be involved through implementation of this truly exciting and innovative program.

The Audubon Society of Portland is an active member of the Coalition For A Livable Future. I am here to support the Coalition's testimony and to highlight those sections that are most relevant to our mission:

1. We concur that there is no demonstrated need for any UGB expansion at this time and that the number of acres to be included in Urban Reserve status should be as minimal as possible, close to that proposed by Metro Executive Mike Burton.
2. Whenever considering a UGB expansion from the Urban Reserves Metro must conform to the three "tests" as put forth by the Coalition:

Test 1: Demonstrate that the local jurisdiction into which the UGB would be expanded is fully implementing the Region 2040 concept, Functional Plan elements and Regional Framework Plan after it is developed;

Test 2: Document how such an expansion would promote a compact, equitable and sustainable community. Specific criteria included in the Coalition recommendation I would like to draw your attention to are:

- o Improving, protecting or establishing stormwater management, groundwater protection, enhanced Greenspace or park protection and management, and other environmental protections on important lands adjacent to the UGB. This assumes that the local jurisdiction can provide improved oversight by incorporating these lands into its UGB. It is possible that a local jurisdictions stormwater management and other environmental protection program might be superior to adjacent lands outside the

UGB, either because they have more resources and expertise or because their land use standards are more effective.

- o Creating a landscape-based transition between urban and non-urban uses, based on topographic features, streams, wetlands, floodplains, and forested areas. This creates landscape-oriented transitions between communities as well as between residential and other urban areas and neighboring farm and forest activities.


Test 3: Adhere to a measurable set of expansion and development criteria that are consistent with the Region 2040 Growth Concept. In other words, any land to be brought into the UGB should first be "Master Planned" to ensure these criteria are met in advance of development. Specific criteria I would like to highlight are:

- o Remove floodplains, flood prone soils, wetlands, stream corridors, and steep slopes over 25% from the buildable lands inventory and develop policies to ensure these lands are not developed or are developed at reduced densities which will ensure the protection of the full range of their functions and values. This calls for the same strategy contained in the current Growth Concept and Functional Plan, which is to remove these lands from the buildable lands inventory so there is less pressure for development.

- o Protect locally and regionally significant natural resources (e.g. fish and wildlife habitat, local and regional trail systems, scenic resources, open space, riparian areas, archaeological resources, etc.). Protection and long term management strategies must be done prior to rezoning so that the underlying zone reflects the natural resource designation.

I would like to comment on the last point in more detail and give you an example of why this is so important to the successful, and smooth, implementation of the Growth Concept. If Metro requires that locally and regionally significant fish and wildlife habitat, open space and other resources are protected up front, prior to any rezoning, then the development community will know---and they frequently say all they want is "certainty"---where they can and cannot develop or, at a minimum, where development will be at greatly reduced densities. Over eight years ago I urged the Portland Planning Commission to conduct its Goal 5 inventory prior to rezoning the Columbia Corridor from EFU to Industrial. Unfortunately, they elected to rezone and later put in place an Environmental Overlay. This, of course, created a false expectation of economic return on lands that would later be difficult or impossible to develop due to Environmental Zoning or state and federal regulations. We do no favor to the development community, falsely leading them to believe 'unbuildable land' was highly developable.

Sincerely,



Mike Houck
Urban Naturalist

Rock Creek Doug Bollam P.O. Box 1944 Lake Oswego, OR.
97035

N ↑



11/21/96-51

Doug Bollam - Rock Creek
P.O. Box 1944
Lake Oswego, OR. 97035

N ↑



A hand-drawn map on grid paper. A vertical line represents a road. A diagonal line, possibly representing a creek or another road, crosses the vertical line. At the intersection, there is a small circle drawn around the point. To the right of the intersection, the letters 'N' and an upward-pointing arrow are drawn. The map is divided into several rectangular sections by horizontal and vertical lines, with some sections shaded gray.

Donna Bollam, P.O. Box 1944 Lake Oswego, OR.
Rock Creek Doug Bollam

P.O. Box 1944
Lake Oswego, OR.
97035

N ↑

Doug Bollam

"Listening Post" of November 21st, 1996

Members of the Metro Council:

My name is Dick Schouten. I live at 6105 SW 148th Ave., near Allen and Murray in Beaverton.

I campaigned for the Washington County Commissioner seat for District #1. District #1 consists of the southern two thirds of Beaverton, Aloha and Reedville. (See the attached map copy.) This campaign lasted nearly eight months, and involved a May election run-off and the November 5th election.

In the course of that campaign I walked door to door in central Beaverton, that is the areas east of Murray, west of 217, north of Allen Blvd and south of Farmington. I walked a significant part of Aloha, namely from Baseline and Cornelius Pass Rd. east to 198th in the north to Oak Street, near Farmington in the south. I walked that part of Aloha bounded by 173rd, TV Highway, 185th and Kinnaman Road, and walked precincts in Cooper Mountain., Murray Hill and other parts of southern Beaverton. I also walked significant stretches of Cornelius Pass Rd., 209th 198th, 192nd, 185th, 170th, Watson, Hall and Lombard.

There is no better way to get a sense of a place than to walk it, campaigning door to door. That kind of walking gives you get real insights into how neighborhoods are doing. You see how well shops, offices, homes and yards are maintained, and whether there are many vacated or abandoned homes and businesses. You see what kind of cars are parked in the driveways and parking lots, and in what state of repair they are in. You see how well people in the area dress.

You hear what languages residents speak, what kind of accents they have. You smell the foods people cook, what kind of pets they have, and how busy their shops are. As you walk through an area you begin to know whether people care about their neighborhood and feel connected to their community, schools and local government.

Slowly but surely you understand in a deep and profound way whether an particular area is thriving, maintaining, struggling or even declining.

There are many solidly middle class neighborhoods in Beaverton, Aloha and Reedville, and some affluent areas as well, but significant parts of Beaverton, Aloha and Reedville are also struggling, and there are pockets of real poverty in the District.

The growing volumes of traffic along Cornelius Pass Road, 185th, Allen and 198th are creating strips of urban and suburban blight along those streets and others. Only the poor and disenfranchised are willing to live with the painful noise levels, dust and grit heard and seen along these roads.

This blight will spread along more and more roads, if we continue to grow on the fringes of the UGB, and have to drive further and further and more frequently to our homes, workplaces and other destinations. The more car dependent we become, the more this blight will spread.

Unfortunately urban and suburban blight is not confined to some of the hellish roads found in District #1.

Central Beaverton has a significant inventory of: poorly maintained homes, apartments and businesses; vacated homes; and empty parcels where homes had once stood. The area has numerous shops that appear to be ~~doing a~~ⁱⁿ marginally²⁵ business, and are struggling. Some businesses are boarded up, or have been vacant a long time. A significant number of residents in this area are also struggling economically, and are alienated from and apathetic to their community. D.S.

I found similar conditions along Shaw Street east of 185th, and in neighborhoods just south of the Shaw Business District. I also found such conditions along 198th from TV Highway to Baseline, and in areas just north of TV Highway and east of Cornelius Pass Road. These areas are in serious trouble, and are near large blue collar, lower middle class neighborhoods.

These large lower middle class neighborhoods have a lot of aging tract homes built from the late 1940's through the early 1970s. These areas need more investments, care and maintenance in the near future. If these areas do not receive these investments serious deterioration will soon occur in many parts of central Beaverton, Aloha and Reedville.

Common sense and the examples of countless communities across the County² tell us that such investments will not take place if the UGB is expanded. The middle class will leave the older suburban areas, and move into areas near or now outside the UGB. The blight I now see in Beaverton, Aloha and Reedville will spread over vastly larger areas. The demographic donut of middle class and affluent neighborhoods located on the outside with the middle in serious decline, found in so many American cities, will replicate itself in eastern Washington County. D.S.

This will result in a terrible waste of land, resources and people.

I therefore recommend that you:

- not expand the UGB for at least the next five years;
- that you minimize the number of acres designated urban reserves; and
- advise the Washington County Board of Commissioners and other applicable decision makers to designate "rural reserves" in Washington County and elsewhere in our region.

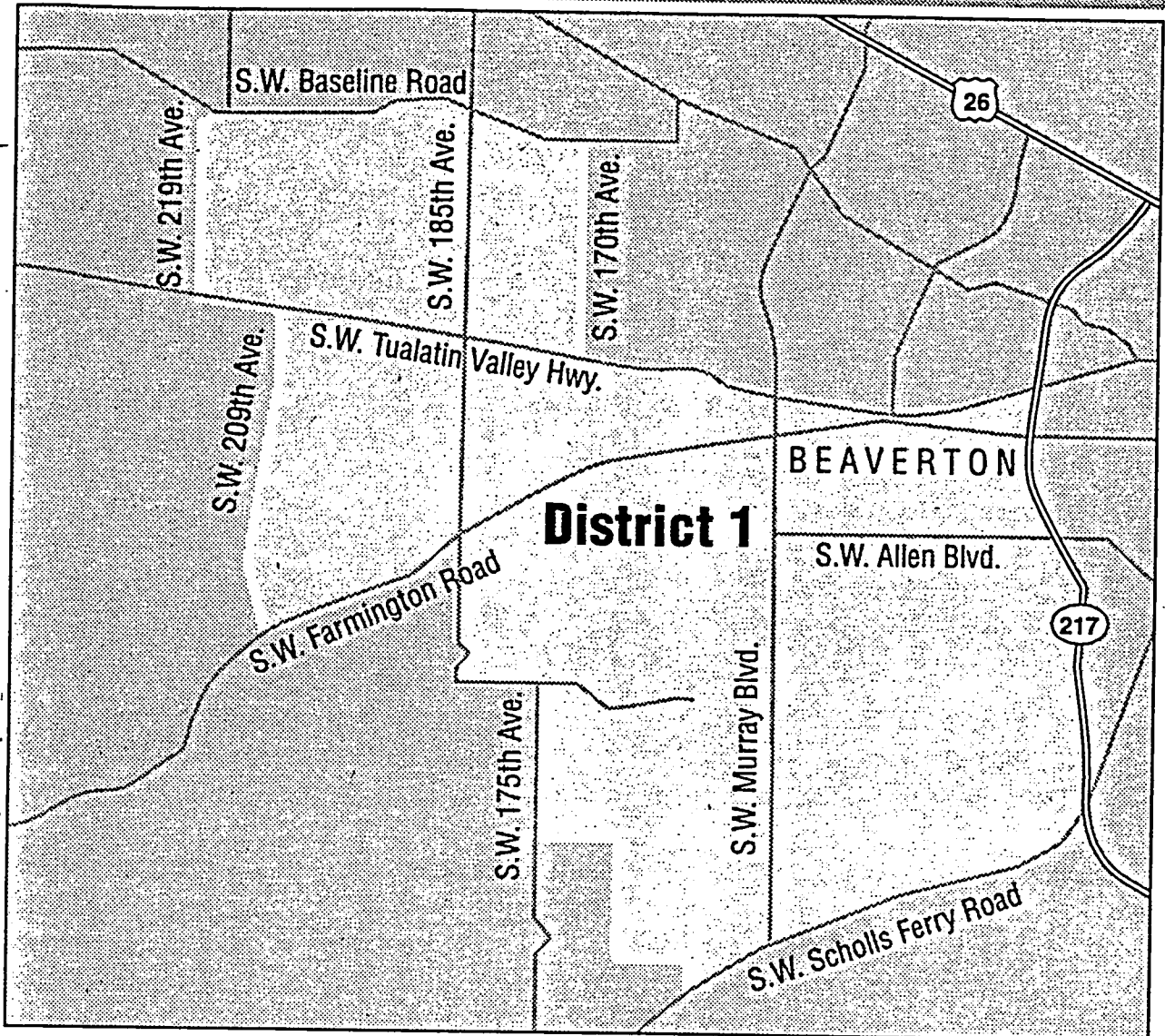
Sincerely,



Dick Schouten

P.S. Also attached for your information is a copy of an article found in the September 29, 1995 issue of The Business Journal. This article and the referenced report prepared by Mr. Myron Orfield raises similiar alarm bells for other parts of the Metro region, and confirms my findings for the "eastern part of Beaverton."

WASHINGTON COUNTY COMMISSION



The Oregonian

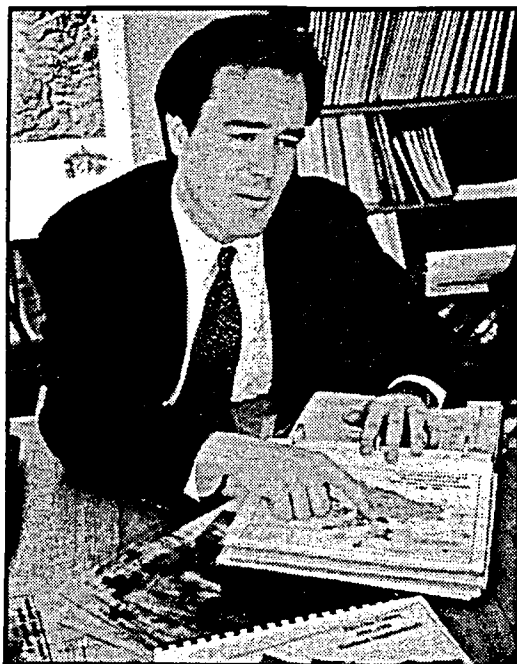


Photo by Mark Barnes

Myron Orfield is a Minnesota state representative with a national profile on urban decay issues.

Like a modern-day Paul Revere, Minnesota politician and researcher Myron Orfield is stumping the country with a dire warning for aging, blue-collar suburbs: "the slums are coming."

In demographic research honed in Minneapolis-St. Paul and now Portland, Orfield pinpoints factors that propel close-in suburbs into a downward spiral of urban decay.

1000 Friends of Oregon and the Coalition for a Livable Future invited Orfield to the Rose City and commissioned him to study census data and other statistical trends. In a recent report on his findings, Orfield noted that Portland is doing many things right to avert urban malaise. But if the metro area isn't careful, he cautioned, it may be only a decade or two behind its Northeast and Midwest counterparts, where rings of close-in suburbs now are often indistinguishable from inner cities.

Orfield spoke with The Business Journal's Steve Law.

The Business Journal: What did your research reveal about trends in Portland's suburbs?

Orfield: In some parts of Milwaukie, Oregon City, Gladstone and mid-Multnomah County, you have high concentrations of poor children and increasing social needs. Yet those local governments have some of the smallest tax resources in the region.

By contrast, you're building a lot of highway and transportation capacity in Washington County, and suburbs there are capturing a very large share of the commercial and industrial base. So you have that tendency to draw apart as a region.

Does urban blight ring city's future?

The Business Journal: You've stated there's been a "general social softening" in mid-Multnomah County, outer Southeast Portland, Milwaukie and Gresham. What data supports that trend?

Orfield: The increase in single-parent families is happening disproportionately in inner suburban areas and poor central-city neighborhoods. During the '80s the percentage of female-headed households in Portland went from 23.1 percent to 24 percent. By contrast, Milwaukie went from 15.7 percent to 21.8 percent, catching up with Portland and changing at a faster rate.

The schools in mid-Multnomah and parts of Gresham are gaining poor children fairly rapidly. When you reach a high percentage of poor children in the schools, middle-class families make decisions to opt out of those particular schools.

The Business Journal: Why are the inner suburban areas of particular concern?

Orfield: Some of these inner suburbs, because of their housing markets and amenities, are more susceptible to social and economic changes. Central cities have lots of things going on—they have gentrification, they have housing stock that's unique and desirable. Lots of things can happen in central city neighborhoods. They can go upward or downward fairly rapidly.

Inner suburban areas, where the housing stock is less varied and less interesting, have a tendency to just go down.

The Business Journal: You've stated that suburbs like Milwaukie lack the tax base to pull out of a downward spiral. What evidence backs that up?

Orfield: Milwaukie has \$114,000 of taxable property value per household, compared to Wilsonville which has \$314,000 or Happy Valley with \$279,000.

Milwaukie is not in a financially extreme situation, but it has a lot more social need pound for pound than those other cities. They had a very large victory in buying one square acre of riverfront. That's good. But it took a lot of their capacity to do that. It would be nice if Milwaukie had the resources not only to take care of its disproportionate share of poor people but to revitalize its riverfront. Milwaukie is essentially built, so it's not going to tap many new resources. It's going to chase after assessed value to keep itself competitive.

The Business Journal: What other disparities did you find in the ability of sub-

urban communities to raise taxes?

Orfield: Forest Grove and Cornelius have lots of poor children in their schools. They have increasing enrollment and not very much taxable property and they're limited by the urban growth boundary. Forest Grove has \$89,659 in taxable property value per household compared to Hillsboro right next door, which is at

"Let's look at Milwaukie. It's not going to hell in a hand basket, but ... it's got old infrastructure. It's got lots of single moms and kids in poverty."

— Myron Orfield

\$156,823. And Forest Grove and Cornelius have got old infrastructure yet they've got to keep competitive. If there were more equity, they wouldn't be pressing so hard trying to expand the urban growth boundary.

The Business Journal: Portland's economy has boomed in the 1990s. Did you find evidence we are reversing some of the decline experienced in the 1980s?

Orfield: In parts of Portland, values of housing are going up. It doesn't seem to have affected outer Southeast too terribly much, or parts of Northeast Portland. The schools tend to have a fairly constant and increasing percentage of poor children, particularly in mid-Multnomah County, Milwaukie and those inner suburbs. Housing prices haven't fundamentally changed that. The fact that housing values are going up is good. That isn't happening in lots of American central cities.

The Business Journal: Portland is making a concerted effort to retain industrial jobs in the inner-east side and lure jobs to the airport area. Doesn't that put the city in a better position to ward off the "regional polarization" you warn about?

Orfield: Those sound like good ideas. In the 1980s, the trend was for most major cities to have a net loss of jobs close in. The job data maps I have for the Portland area are kind of mixed. In the last four years, Washington County has garnered

Continued on next page

Orfield: tax base sharing may forestall spread of urban woes

about 50 percent of the new jobs but has only about 25 percent of the population.

Over time the outer edge offers powerful advantages in terms of tax rates and land without environmental pollution. It's just easier to build out there. You don't have to fight with the built neighborhood. You don't have to deal with industrial pollution. It's a hard problem.

The Business Journal: If Washington County is getting most new jobs, what can be done to attract those jobs to inner suburbs? The market is only going where there is a concentration of industry.

Orfield: That's right and God bless the market. But the whole region is providing a lot of new highways and new resources to enable that. The market is a regional market. When a regional economy is broken down into 26 hyper-regulated boxes, it's not necessarily reflecting the market. It tends to distort the market in some ways with tax rates and a variety of other things.

The Business Journal: You're making a case for regional sharing of property taxes. Why is it needed?

Orfield: Ultimately, when you get suburbs with lots of lesser-value housing and they've got lots of poor people, it's hard to break that cycle. There's not a hell of a lot they can do by themselves anymore.

Let's look at Milwaukie. It's not going to hell in a hand basket, but it's getting older. It's got old infrastructure. It's got lots of single moms and kids in poverty. Over time, pound for pound, Milwaukie's got more social need than Lake Oswego. It has more demand for social services and it has very little base.

The Business Journal: How would you sell that idea to affluent suburbs that can be expected to oppose sharing the wealth?

Orfield: Regions that have less disparity between communities are economically healthier. A large percentage of the growth in suburban areas is attributable to the central city's health. Metropolitan economies are tremendously intertwined. A stable central city that isn't threatened by decline is very important to the stable economic health of a region.

The Business Journal: But how do you convince a Beaverton or a Lake Oswego to share its money?

Orfield: Beaverton's beginning to feel some of these changes in urban areas. There are pockets of Beaverton with

rapidly increasing social needs. In the eastern part of Beaverton, there are several census tracts where between 20 and 40 percent of the households are headed by single parents. The western side is less than 10 percent, many of them less than 5 percent.

The Business Journal: Minneapolis-St. Paul led the nation in tax-base sharing. Have any cities followed in its footsteps?

Orfield: No, but some have done more dramatic things. Indianapolis consolidated the city and the suburbs into one county. That's a lot more dramatic than tax-base sharing.

The Business Journal: Is it now a widely accepted system in Minneapolis-St. Paul, or is it constantly under political attack?

Orfield: It has been under attack by the wealthier, more affluent communities. It's more accepted than it's ever been, but they've never liked it very much. It was a system of regional reform, much like your land-use system.

The Business Journal: What were the most alarming trends in the changing demographics of the Portland area?

Orfield: Through the late '80s and early '90s, you had an increase in the concentration of poverty in North and Northeast Portland, and growing segregation in the schools. In a region that has almost no diversity, you have elementary schools in the poorest part of the city that are 70 percent African-American.

The Business Journal: Is that necessarily bad? Some African-American leaders don't think that's a problem, because there may be improved cultural identification.

Orfield: It's not a problem if the segregated schools are in mixed-income neighborhoods. But they don't look very mixed here.

Part of the success of a school is having an active, middle-class enrollment in it. Poor people are highly mobile and they're not as active in public affairs, or as vigilant in observing the quality of schools. They're not as politically powerful.

The Business Journal: You've observed that economic health and stability often go hand in hand with middle-class enrollment in schools. If Oregon switches to a voucher system or charter schools, will middle-class people flee, exacerbating the trends you've spotted?

Orfield: Yes, middle-class parents make choices and they opt out. It tends to leave poor kids behind. We're a leader in charter schools and we've found that not many people take advantage of it. Those that have, if they're in middle-class areas or upper-middle class areas, create very, very good schools. Poor people don't do it too much.

In terms of vouchers, I think the highest level of voucher use has been something like 5 percent, and the biggest reason for choosing another school was the availability of sports teams. It's one of these 1980s-type reforms that sounded better than it turned out to be.

The Taxable Property Gap (1993 figures)

City	Property value (in millions)	Total households (1990)	Taxable property per household
Cornelius	\$178	2,099	\$84,801
Forest Grove	440	4,911	\$89,659
Milwaukie	\$908	7,916	\$114,682
Portland	\$21,691	187,262	\$115,832
Gresham	\$3,059	25,870	\$118,251
Oregon City	\$651	5,522	\$117,834
Beaverton	\$3,193	22,247	\$143,547
Hillsboro	\$2,017	12,864	\$156,823
Tigard	\$2,176	12,084	\$180,045
Lake Oswego	\$2,372	12,589	\$188,395
Wilsonville	\$975	3,105	\$314,034

Source: Myron Orfield

D.S. PARKLANE DEVELOPMENT, INC.

**REPORT TO INCLUDE
D.S. PARKLANE PROPERTIES
IN THE URBAN RESERVE AREA**

Presented to
Metro Council
on
November 21, 1996

Prepared by
Gregory S. Hathaway
Davis Wright Tremaine
and
Dick Waker
Waker Associates, Inc.

DAVIS WRIGHT TREMAINE

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November 21, 1996

Ruth McFarland, Councilor
Don Morissette, Councilor
Jon Kvistad, Councilor
Susan McLain, Councilor
Ed Washington, Councilor
Rod Monroe, Councilor
Patricia McCaig, Councilor
METRO COUNCIL
600 N.E. Grand Avenue
Portland, OR 97232-2736

Re: Written Testimony in support of Inclusion of D.S. Parklane Property
in the Urban Reserve Area

Dear Members of the Metro Council:

Dick Waker and I represent D.S. Parklane Development, Inc. ("D.S. Parklane"), which owns property located in URSA 55 and URSA 65 in Washington County. These properties are specifically identified on maps attached under tabs "Site 55" and "Site 65" of this booklet.

The property in URSA 55 is adjacent to The Reserve Vineyards and Golf Club, a 36-hole golf facility off of S.W. 229th Avenue, which is presently under construction and will be open in the Summer of 1997. D.S. Parklane is the owner of The Reserve Vineyards and Golf Club. Approximately three-quarters of the 42-acre property is within URSA 55. The property in URSA 65 is located at the northwest corner of the intersection of West Union Road and S.W. 185th Avenue and is approximately 113 acres.

We respectfully request the inclusion of URSA 55 and URSA 65 and the D.S. Parklane property in the Urban Reserve Area for the following reasons:

SITE 55

1. If your Council decides to place 18,000 acres within the Urban Reserve Area, Site 55 would be included using the Computer Model and Weighing Factors of the Executive Officer.

2. URSA 55 is vital to the City of Hillsboro's need to provide housing for its job rich employment centers. We support the City of Hillsboro's request to your Council to include Site 55 within the Urban Reserve Area. (See Letter dated November 12, 1996 to John Kvistad and Metro Council from Gordon Faber, Mayor of City of Hillsboro.)

3. If your Council elects to include the Sisters of St. Mary's property within the Urban Reserve Area, it makes good planning sense to include the entire URSA 55. Properties within URSA 55 along the southern boundary of the study area (including the D.S. Parklane property) are adjacent to or are in close proximity of The Reserve Vineyards and Golf Club which would act as a buffer between urban development to the north of the golf course and natural resource land to the south of the golf course.

4. If URSA 55 is included within the Urban Reserve Area by your Council, the entire D.S. Parklane property should be included. As stated above, approximately three-quarters of the site is within URSA 55. The portion that is not included is immediately adjacent to The Reserve Vineyards and Golf Club. It would be inappropriate to leave a small portion of the property in natural resource especially since that portion would be between the golf course and urban development.

SITE 65

Your Council should separate URSA 65 into two district subareas due to the unique characteristics of each subarea. The D.S. Parklane property at the northwest corner of West Union Road and S.W. 185th Avenue and other adjacent properties east of the D.S. Parklane's property up to S.W. 185th Avenue should be classified as URSA 65A because of its immediate proximity to the existing Urban Growth Boundary ("UGB") and urban development. (See Aerial Map attached to the Supporting Information for Site 65 in this booklet.) The remainder of URSA 65 is located to the east of S.W. 185th Avenue and north of Springville Road and is characterized by open farm land zoned Exclusive Farm Use.

As a result, if URSA 65 is separated as described above, the scoring of this site changes dramatically (see New Scoring for URSA 65A in Supporting Information for Site 65 in this booklet). In fact, URSA 65A and the D.S. Parklane property become a key area for inclusion within the Urban Reserve for future development for the following reasons:

1. If your Council decides to place 18,000 acres within the Urban Reserve Area, Site 65 would be included using the Computer Model and Weighing Factors of the Executive Officer.
2. The property is surrounded on three sides by urban development.

3. Because the property is immediately adjacent to the Urban Growth Boundary, the property can be served by sewer, water, roads and emergency response services.
4. The property is close to job rich employment centers and regional shopping in the immediate area.
5. The property has convenient access to the regional freeway system and is serviced by Tri-Met.
6. The property is near educational facilities along 185th Avenue, including Portland Community College, Westview High School and the grade school.
7. A natural buffer in the form of a wetland exists on the property to the northwest which provides an appropriate separation between natural resource land and urban land. As a result, urbanization of this property would not be in conflict with agricultural operations to the northwest of the property.
8. The property consists of wetlands, lands zoned A and F, and EFU. A current conflict exists between farming on this property and urban development in the area due to the fact that it is surrounded on three sides by urban development.
9. The property is in a single ownership and is large enough (113 acres) to accommodate a mixed use development which would benefit the area.
10. The urban development of the property would not create significant adverse impacts on adjacent properties.

In closing, we believe it is critical for Metro to designate Urban Reserve Areas in Washington County to ensure there is appropriate housing to accommodate the employment centers in the County. If your Council believes that 18,000 acres of land needs to be placed within the Urban Reserve Area, then all of Sites 55 and 65 qualify using the Computer Model and Weighing Factors of the Executive Officer.

However, notwithstanding the Computer Model, Sites 55 and 65A are two of the very most important sites in Washington County and your Council should include them in the Urban Reserve Area.

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Description

Letter from Gregory S. Hathaway

Information Supporting Inclusion of D.S. Parklane Property (Site 55)

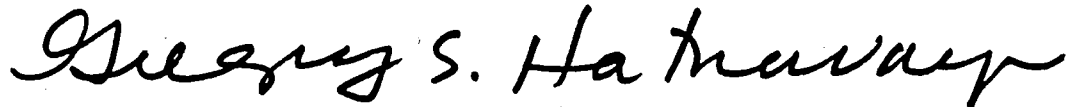
Information Supporting Inclusion of D.S. Parklane Property (Site 65)

Metro Council
November 21, 1996
Page 4

Thank you for your consideration.

Yours very truly,

DAVIS WRIGHT TREMAINE

A handwritten signature in cursive script that reads "Gregory S. Hathaway". The signature is written in dark ink and is positioned above the printed name.

Gregory S. Hathaway

GSH:lkt
f:\4\41943\2\metro2.ltr

cc: D.S. Parklane Development, Inc.
City of Hillsboro
Washington County

100.0% Outer Neighborhood. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 8 POP; 3 HH; 0 EMP.

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
53	204	183	114	1,138	467	8	2	4
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
7	6	5	5	3	10	0	0	1

URSA #54 has 189 acres, 143 are EFU that occur in the northern half of the study area. The percentage of net buildable acres by 2040 design types is: 49.4% Inner Neighborhood; 50.6% Outer Neighborhood. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 23 POP; 8 HH; 21 EMP.

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
54	189	143	137	1,433	560	8	3	4
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
9	9	9	8	3	10	0	0	0

URSA #55 is directly south of Tualatin Valley Highway; it covers 883 acres. There are 476 EFU acres that are located in the eastern and southern sections of the study area. Gordon Creek, a tributary of the Tualatin River, flows in a northwesterly direction through the site. River Road runs through the western section. Most of the western part of the study area is divided into tax lots ranging from a half acre to over 20 acres. The eastern section, between SW 209th and SW 229th, contains two large tax lots. The percentage of net buildable acres by 2040 design types is: 45.1% Inner Neighborhood; 54.9% Outer Neighborhood. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 267 POP; 92 HH; 12 EMP.

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
55	883	476	499	5,216	2,046	8	3	4
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
10	6	5	5	6	10	0	2	2

Study Area #56

URSA #56 is south of SW Hwy. 47 and south of Forest Grove. It covers 48 acres, which are all zoned EFU. The land is flat and devoted to farming. The percentage of net buildable acres by 2040 design types is: 100.0% Outer Neighborhood. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 2 POP; 1 HH; 0 EMP.







Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
56	48	48	23	233	96	7	2	10
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
7	5	4	4	4	10	0	0	0

Study Areas #57, #58, #59 & #60

These study areas are north of Forest Grove and Cornelius, and adjacent to the UGB in Washington County.

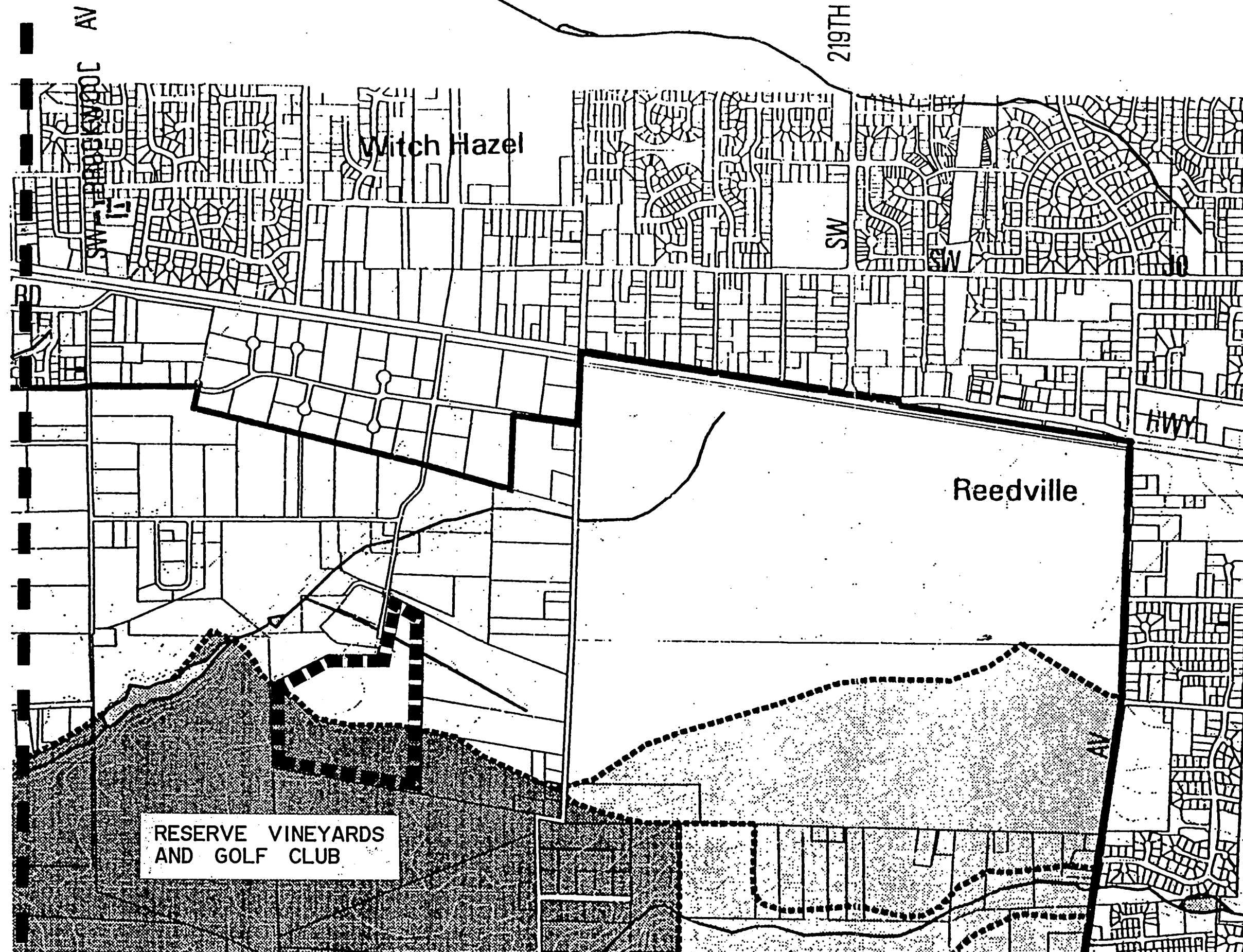
Urban Reserve Study Areas

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

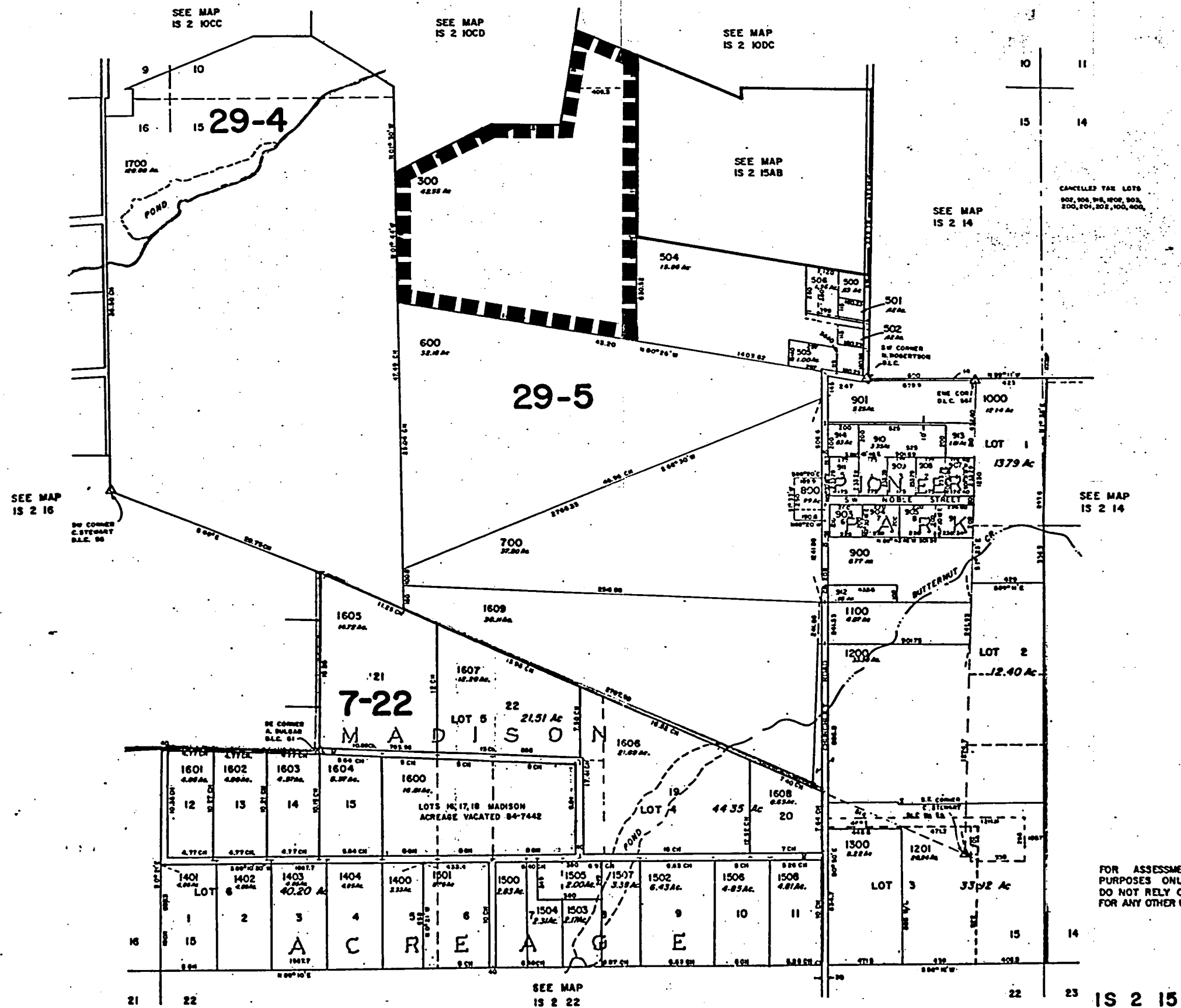
MAP #55

Acres	EFU Acres
882.90	476.297



IS 2 15

SCALE 1"=400'



FILMED MARCH 8, 1986 BY WASHINGTON COUNTY MAPS FOR ASSESSMENT PURPOSES ONLY DO NOT RELY ON FOR ANY OTHER PURPOSES

Development of Sub Areas for URSA #65

URSA #65

"covers 541 acres; 285 are zoned EFU. Part of the study area is West of NW 185th Avenue, the other area is north of the Rock Creek Campus of Portland Community Campus, and north of Springville Road. Pockets of EFU land are located west of NW 185th Avenue in the Bethany area, east of the college, and around NW Kaiser Road, which travels north/south through the eastern half of the study area. ..."

Current Rating - Executive Officer Recommendations - Urban Reserves - Background Data - Exhibit "A" 9-96

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP cap.	Util. Feas.	Rd. Netwrk	Traffic Con.
65	541	285	318	3198	1303	8	6	6
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. Ctrs.	Jobs Rich	HH Rich	Agric. Ret.	Agric. Comp.
5	6	6	6	4	3	0	4	6

Total Unweighted Score - 60

URSA # 65 is a large composite study area that strings along the northern UGB in central suburban Washington County. The physical and service characteristics of the study area as an entirety are not evenly characterized. The following specifics are localized for the southwestern portion of the URSA, and are NOT generally true for the URSA #65 as a whole.

The southwestern portion of the URSA is adjacent to major arterials running in both directions, and is in very close proximity to public elementary and high schools, as well as the Rock Creek Campus of Portland Community College. The southwestern portion of URSA #65 is also ideally situated for access to extensive existing infrastructure; public roads, public utilities, Sunset Highway interchange, and service development; Tanasbourne Town Center, as well as close proximity to a significant existing employment base. There is Tri-Met bus service to the southwestern portion of the URSA via line #52, with an average headway of 15 minutes during weekday service. There are additional Tri-Met bus routes that connect with route # 52 that provide excellent public transportation connectivity to existing schools, shopping, and areas of high employment.

Revised Scoring Criteria

Due to the significantly different site and service characteristics that benefit the southwestern portion of URSA #65 that are NOT generally true for the remainder of the larger #65 URSA, the whole study area should be broken into two sub-areas, URSA #65A and URSA #65B. Sub-areas A and B should be evaluated separately and rated accordingly. The following revised chart demonstrates a updated rating for Sub-area #65A, with a detailed evaluation of the **CRITERIA FACTORS** supporting the updated rating.

Suggested Updated Rating -URSA #65A - Southwestern Portion of #65 - Specific Locale Rating

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP cap.	Util. Feas.	Rd. Netwrk	Traffic Con.
65A	tbd*	tbd	tbd	tbd	tbd	9	10	6
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. Ctrs.	Jobs Rich	HH Rich	Agric. Ret.	Agric. Comp.
8	6	6	6	9	10	0	4	8

* tbd - to be accurately determined

Total Unweighted Revised Score - 82

Utility Feasibility

Based on the KCM analysis of all of the proposed URSA's, #65 as a whole falls well within the acceptable averages for cost feasibility for the provision of public utilities to the entire study area. Sub area #65A could merit a higher rating if evaluated separately, because sanitary sewer service is readily available to the sub-area, without construction of significant main service lines. Storm water detention and water quality treatment costs could be lower for the sub-area than for the URSA as a whole, because detention is usually not required when development is directly adjacent to a creek or other natural conveyance, and water quality facilities are easily constructed and maintained when they are adjacent to wetlands, and wetland or flood plain buffers. Sub-area #65A contains these site-specific characteristics which will reduce development costs. URSA #65 has a very low cost estimate for development of public water service, and rates as the second least expensive URSA overall for water infrastructure development.

Road Network

URSA #65 as a whole will require development of arterial and collector networks. Sub-area #65A does not require any arterial or collector street development by a public agency. The necessary arterial development is in place, and any collector development will be constructed as part of a specific development. Thus construction costs will be borne entirely by the developer. Connectivity within the Sub-area #65A will be mandated by the Washington County Development Code, as a condition of any development proposal. The rating for the road network for sub-area #65A can be significantly higher than the rating for the overall URSA #65.

Traffic Congestion

The rating for traffic congestion for the sub-area is unaltered from the overall URSA #65.

Schools

Because of the considerable distance encompassed by URSA #65, from east to west, the overall rating for school availability is rather low. Sub-area #65A however, is very close to the new public high school, the existing public elementary school, and Portland Community College. Additionally all of those schools are served by public bus lines, in addition to the high-capacity street system. The schools rating for sub-area #65 can be higher due to the close proximity of public schools.

Efficiency Factor

No change in the rating is mandated in sub-area #65A.

Buildable Land

No change in the rating is mandated in sub-area #65A.

Environmental Constraints

No change in the rating is mandated in sub-area #65A.

Access to Centers

Because of the considerable distance encompassed by URSA #65, from east to west, the overall rating for access to centers is rather low. Sub-area #65A however, is very close to the new Tanasbourne developments and the jobs-rich industrial areas to the southwest. Additionally all of the service centers, as well as the jobs-rich industrial areas are served by public bus lines, in addition to the high-capacity street system. The "access to centers" rating for sub-area #65 can be higher due to the close proximity of services and jobs, and the availability of public transit.

Jobs Rich

Sub-area #65A is located proximally to one of the largest "job-rich" and "future jobs-rich" areas in the Metro region. Public transit lines have been designed and currently run to connect this sub-area and the jobs-rich industrial areas to the southwest of the subject site. The rating for this sub-area should be significantly higher for this factor.

Housing Rich

Sub-area #65A is not housing rich, as the demand for housing far exceeds the current supply. Land values for currently available urban residential land have sky-rocketed, indicating a serious need for additional land for residential housing in this sub-area. The current average lot size proposal for detached single family in this area of Washington County is 4,000 square feet in area. There are significant residential proposals currently under review by Washington County DLUT staff, and available residential lands are dwindling in this sub-area.

Agricultural Retention Factor

No change in the rating is mandated in sub-area #65A.

Agricultural Compatibility Factor

Sub-area #65A is currently bounded on three sides by urban development. Current applications submitted to Washington County DLUT propose additional high density residential development proximal to sub-area #65 on the east. NW 185th Avenue is not a good boundary between urban and rural uses because of the conflicts between farming practices and high density residential development. The inclusion of sub-area #65A would move the proposed Urban Area to a natural boundary by using Bronson Creek and its floodplain, wetlands, and wetland buffers as a wider, kinder, and more natural separation between urban and rural uses. This sub-area is not going to conflict with agricultural uses of land farther to the west, and is not good farm land currently. Sub-area #65A is not currently compatible with agricultural farm use currently, thus the rating should be higher, in favor of a more appropriate urban use, with the potential for re-establishment of the UGB along Bronson Creek. Importantly, one component of the METRO regional planning vision is the development of the Bronson Creek Regional Trail, which would co-incide with the proposed western boundary of sub-area #65A.

Outer Neighborhood; 0.1% Open Space. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 238 POP; 85 HH; 280 EMP.

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
64	616	400	354	3,713	1,451	7	5	10
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
3	6	6	6	3	3	0	3	3

URSA #65 covers 541 acres; 285 are zoned EFU. Part of the study area is west of NW 185th, the other area is north of the Rock Creek Campus of Portland Community College and north of Springville Road. Pockets of EFU land are located west of NW 185th in the Bethany area, east of the college, and in the northeastern part of the study area. The exception land is located north of the college and around NW Kaiser, which travels north/south through the eastern half of the study area. The average slope of the area is 7%. The percentage of net buildable acres by 2040 design types is: 6.4% Inner Neighborhood; 93.6% Outer Neighborhood. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 110 POP; 39 HH; 2 EMP.

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
65	541	285	318	3,198	1,303	8	6	6
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
5	6	6	6	4	3	0	4	3

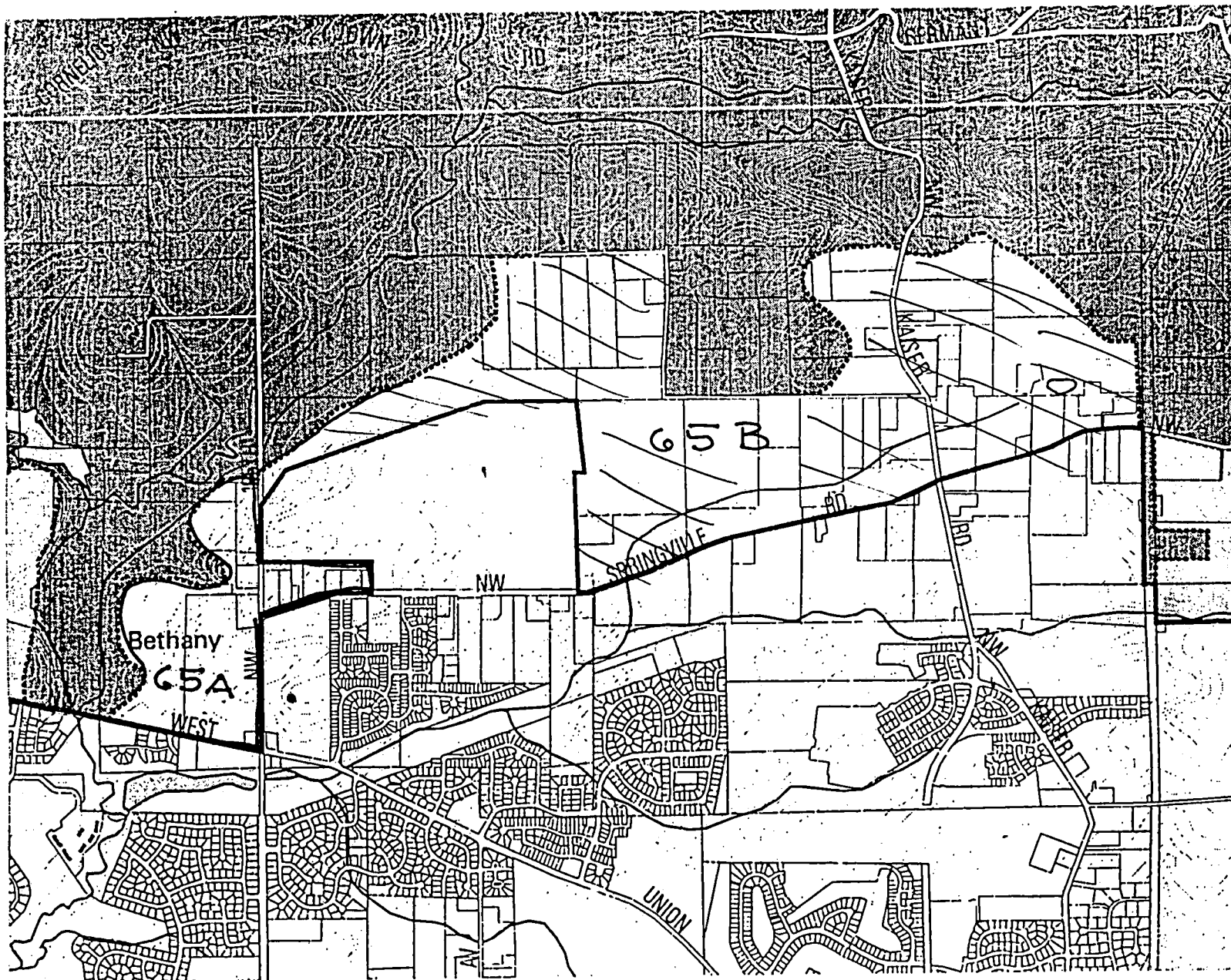
URSA #66 is 62 acres zoned EFU. It is located south of NW Springville Road and east of Site #65. The southernmost tax lot is in Washington County while the remaining parcels to the north are in Multnomah County. The parcels are undeveloped and some farming is taking place. The percentage of net buildable acres by 2040 design types is: 100.0% Outer Neighborhood. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 0 POP; 0 HH; 0 EMP.

Site #	Acres	Res. Ac.	Bld. Ac.	DU Cap.	EMP Cap.	Util. Feas.	Rd. Network	Traffic Cong.
66	62	62	28	227	114	5	2	6
Schools	Eff. Factor	Bld. Land	Env. Const.	Acc. to Ctrs.	Jobs Rich	HH. Rich	Agric. Ret.	Agric. Comp.
2	4	3	3	3	3	0	2	3

Study Areas #67 & #68

Both of these study areas are located off NW Thompson Road in Multnomah County. Site #67 is north of NW Thompson Road, while Site #68 partly north and south of it.







URSA #67 is a steeply sloped (averaging 20%), forested area with 406 acres; 47 are zoned EFU. The EFU acres are in the northwestern section of the study area and are surrounded on three sides by exception land. NW Laidlaw provides access through most of the study area, and along the road rural type development has occurred on parcels between approximately one to ten acres. Bronson Creek and its tributaries flow through the study area. The percentage of net buildable acres by 2040 design types is: 91.6% Outer Neighborhood; 8.4% Open Space. The 1994 population (POP), households (HH), and employees (EMP) are as follows: 195 POP; 76 HH; 0 EMP.



Regional Land
Information System

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 #65

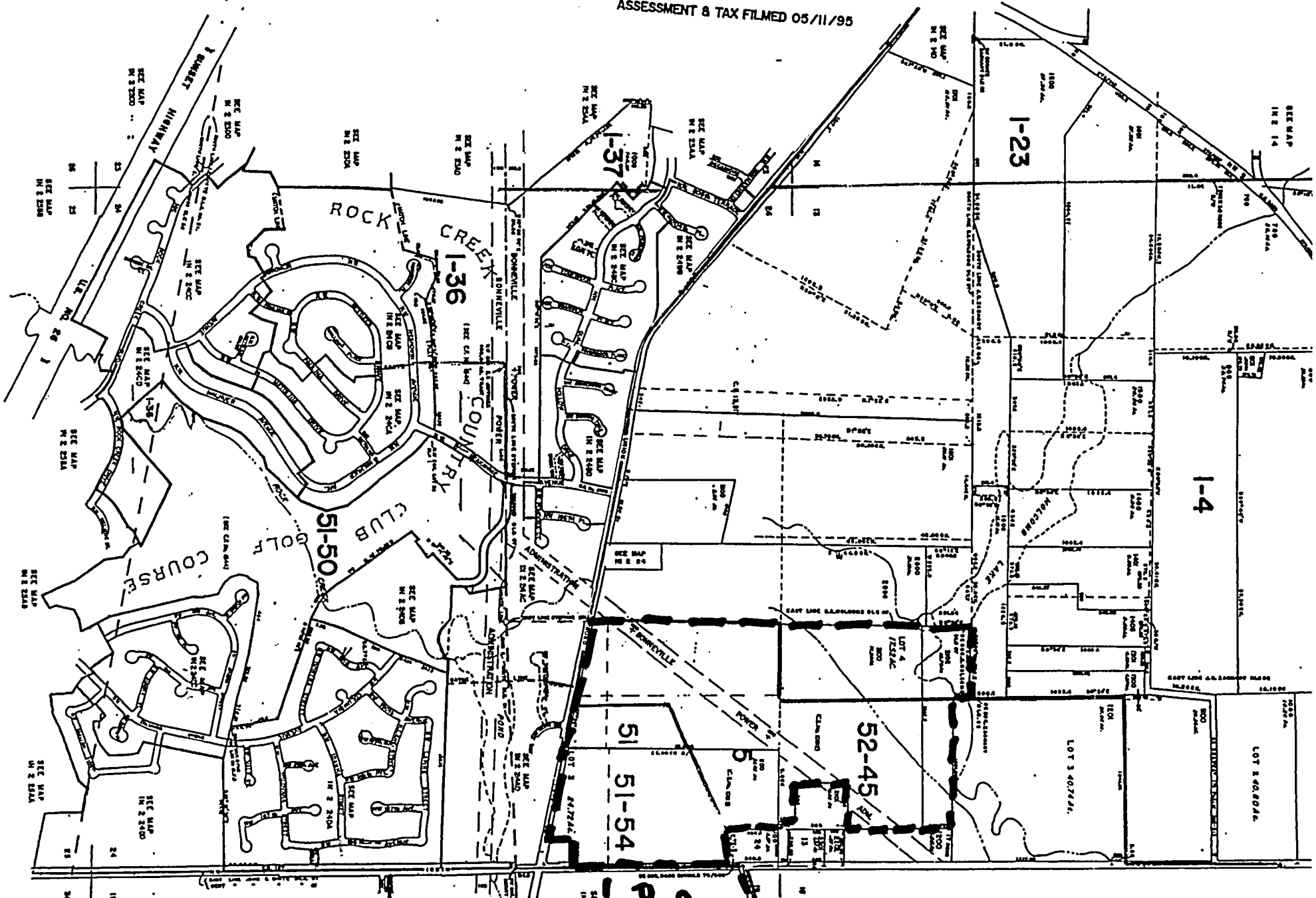
Acres	EFU Acres
540.67	285.492



600 NE Grand Ave
Portland, OR 97232-2736
(503) 797-1742



ASSESSMENT & TAX FILMED 05/11/95

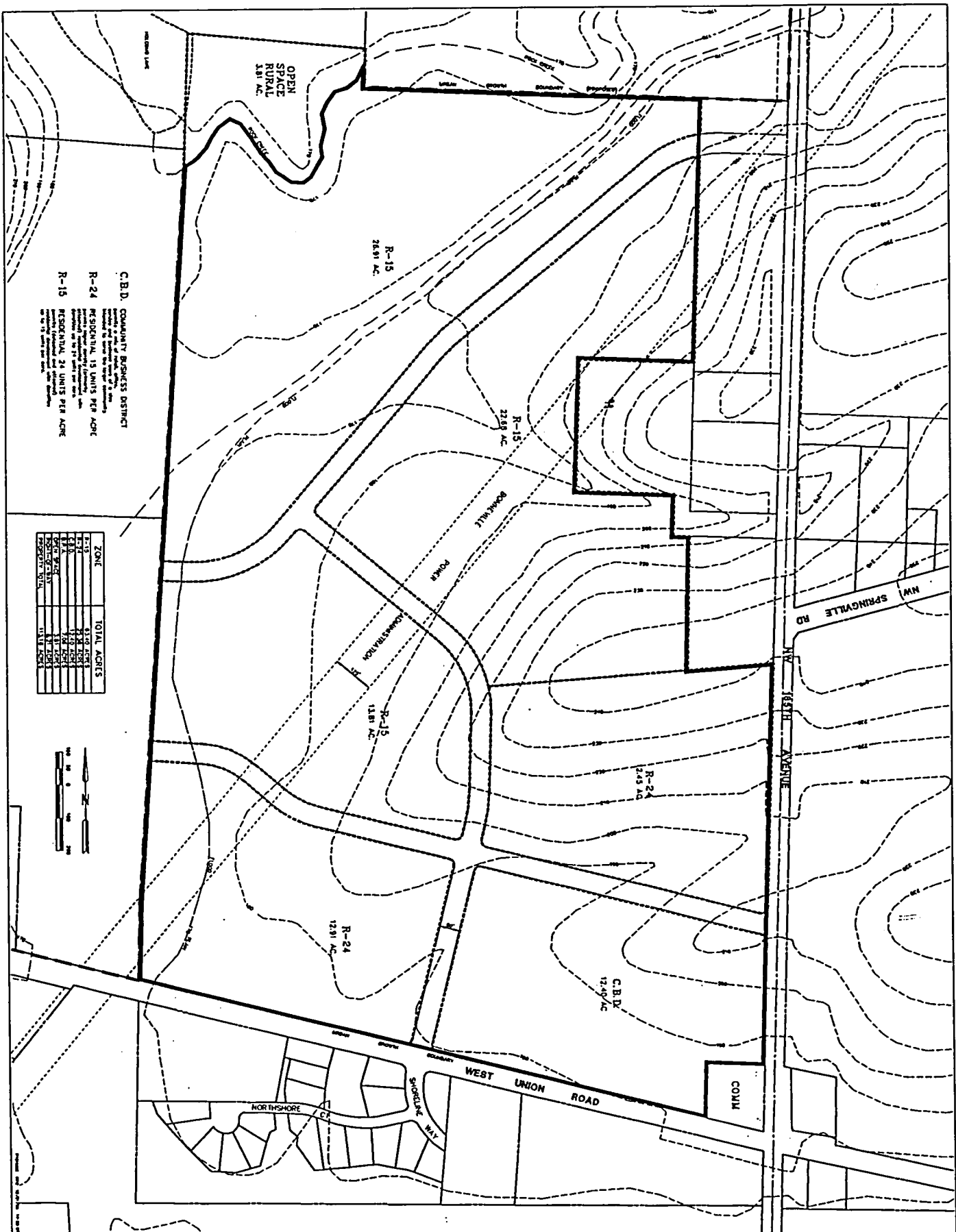


FOR ASSESSMENT
PURPOSES ONLY
DO NOT RELY ON
FOR ANY OTHER USE

Pe-Pop
Curae

IN 2 24

IN 2 24



C.B.D. COMMUNITY BUSINESS DISTRICT
 Minimum lot area: 10,000 sq. ft.
 Minimum lot width: 100 ft.
 Minimum lot depth: 100 ft.
 Minimum lot area: 10,000 sq. ft.
 Minimum lot width: 100 ft.
 Minimum lot depth: 100 ft.

R-24 RESIDENTIAL 15 UNITS PER ACRE
 Minimum lot area: 10,000 sq. ft.
 Minimum lot width: 100 ft.
 Minimum lot depth: 100 ft.

R-15 RESIDENTIAL 24 UNITS PER ACRE
 Minimum lot area: 10,000 sq. ft.
 Minimum lot width: 100 ft.
 Minimum lot depth: 100 ft.

ZONE	TOTAL ACRES
R-15	12.81
R-24	12.91
C.B.D.	12.40
OPEN SPACE RURAL	181.00
TOTAL	229.12



FOR: D.S. PARKLANE
 LOCATION: WASHINGTON COUNTY

WAKER Associates, Inc.

1000 S.W. ALLEN BLVD., SUITE 200 / CLATSOP COUNTY, OREGON 97130-3000

WEST UNION/185TH FEASIBILITY STUDY

DATE	11/11/01
BY	J. WAKER
CHECKED BY	J. WAKER
APPROVED BY	J. WAKER
DATE	11/11/01

24 18

SPRINGVILLE

PHASE TWO
144 UNITS

PHASE ONE
360 UNITS

185TH

N.W. 185th AVE.

- 100
- 101
- 102
- 103
- 104
- 105
- 106
- 107
- 108
- 109
- 110
- 111
- 112
- 113
- 114
- 115
- 116
- 117
- 41
- 42
- 43
- 44
- 45
- 46
- 47

CURRENT PROPOSAL

SCHOOL ATTENDANCE BOUNDARIES

BEAVERTON SCHOOL DISTRICT 48

INTERMEDIATE SCHOOL BOUNDARIES

HIGH SCHOOL BOUNDARIES

1

Abbot Ln., G-5
Acorn Pl., C-5
Adrian St., B-3
Agate Ct., I-5
Alameda La., H-5
Alan Blumlein Rd., F-6
Albella Pl., H-6
Albert Ct., I-4
Albion Ct., D-5
Alcott Av., E-7
Alden Ct., St., I-8, 9
Alderidge Dr., D-8
Aldenwood Dr., E-3
Aldrich Ct., H-5
Alexander St., F-3
Alger St., G-7
Alibhai St., G-7
Alice Ct., La., H-7
Allen Av., H-6, 7, 8, 9
Allenbach Pl., B-4
Almonte Ct., H-4
Aloha Ct., F-3, 4
Aloha St., F-4
Aloma Wy., H-9
Alpenglow Wy., D-8
Alpine Dr., H-7
Alpine Ter., F-8
Alton St., F-4
Altshin Pl., D-5
Alvord La., J-4
Alyssa Ln., F-8
Amber Ln., G-9
Ames Wy., G-9
Amity Ln., C-4
Amy Ln., I-4
Anastasia Dr., B-4
Anderson St., G-3, D-7
Andrew Pl., D-7
Andria St., C-4
Angel St., G-6
Angora Ln., J-6
Anna St., H-7
Annette Ct., C-7
Anton Dr., J-7
Appaloosa Pl., SW, I-6
Apple Wy., G-9
Aqueduct Ct., I-6
Arabian Dr., I-6
Aragon St., E-6
Aralia Pl., I-6
Arborcrest Ct., F-4
Arboretum Wy., F-4, F-8
Arcadia Ct., D-5
Arcadia St., C-4
Arcadian Ln., D-8
Arctic Dr., G-8
Ardenwood St., F-8
Argyle Wy., B-4, 5
Arranmore Wy., Ct., Pl., H-8
Arrowwood Dr., H-8
Arrowwood La., G-8, H-8
Artesian Ct., Ln., E-4
Ascot Ct., E-9
Ash St., D-8, D-9
Ashbury Ln., J-6
Ashland Dr., Pl., C-4
Ashwood Ct., J-7
Aspen St., G-8
Asloria Dr., C-3
Athena Pl., St., B-3
Augusta La., F-4
Aurora Pl., St., B-3
Autumn Dr., La., G-5
Autumn Ridge Dr., D-4
Avalon Ct., Dr., C-4
Avocat Ct., J-5
Avondale Dr., C-4
Azalea Ct., H-6

2

Champlin La., J-4
Channa Dr., B-5
Chapman Ave., G-7
Chapel Ct., Ln., H-9
Chaps Ct., I-7
Charlot I-6
Charlats St., C-4, 5
Charlotte Dr., I-4
Charming Wy., G-9
Chetlain Dr., F-4
Chehalem Ct., K-6
Chelan Pl., I-7
Chelsea Pl., H-9
Chemeketa Ct., Ln., B-4
Cherry Av., G-8
Cherry Hill Ct., Dr., H-6
Cheryl La., H-7
Cheshire Rd., H-7
Chestnut Av., La., G-8
Chickadee Ter., J-5
Chimney Ridge Ct., Dr., J-6
Christy Av., F-7
Cindy St., H-7
Cinnabar Ct., I-5
Circle A Dr., C-6
Cirrus Dr., I-7
Citation Dr., Pl., J-6
Claremont Dr., B-5
Claremont Ter., E-7
Clarion Ct., F-3
Clarno Ct., B-4
Cleek Pl., B-5
Clifford Sr., H-7
Club Meadow La., G-8
Clydesdale Ter., J-6, 7
Coach Ct., I-6
Coburg Ct., Ln., C-4
Cody Ln., St., H-4
Coe Way H-5
Coleman Dr., D-7
Colleen Ct., H-5
Colony Ct., G-6
Colony La., F-6
Coll Ct., I-6
Columbia Av., Blvd., B-3
Comadrona La., B-4
Combine St., Ct., J-6
Compton Dr., D-3
Concord Wy., E-4
Concordia Ct., B-4
Conestoga Dr., I-7
Connamara Ter., I-7
Connell Meadow Ct., B-4
Copeland St., D-7, 8, 9
Copper Ct., I-5
Corinthian St., C-4
Corridor Ct., C-4
Cormorant Ct., Dr., J-5
Cornell Rd., D-4
Cornhusker Av., J-6
Corona Ln., E-4
Cortez Ct., I-6
Cottontail Ln., Pl., J-6
Cottonwood La., J-7
Cougar Ct., J-6
Country Club Dr., C-5
Country Dr., C-4
Countryview Wy., C-6
County Haven Ln., J-4
Cove Ct., B-4
Coventry Pl., G-4
Craig Dr., C-5
Cranberry Cr., G-5
Crater Loop H-7
Creekside Dr., C-6
Creekside Pl., I-7
Cresmoor Dr., H-7
Crestview Pl., H-7
Crestwood Ct., St., I-8
Crestwood La., G-9
Crestwood Dr., I-8, G-9
Crist Ct., K-6
Cross Creek Dr., H-3
Crystal St., H-8
Cumberland Wy., E-4
Curran Dankel Ln., E-9
Cushman Ct., I-9
Cutter Pl., I-6
Cynthia Ct., St., H-5, 6, 7, 8, H-4
Cypress Av., G-8

3

Fulmer Ct., D-8
Furlong Ct., Wy., E-6

4

Gable Park Rd., F-9
Gable Parkway F-9
Gallop Ct., I-6
Galloway Ct., J-6
Garden La., H-8
Garden Home Rd., H-8, 9
Garden View Av., F-8
Gassner Rd., I-3
Gault Ct., I-7
Gatto Ct., C-7
Gayle La., F-8
Gearhart Dr., Ct., H-5, I-5
Gem La., F-7
Gemini Dr., I-7
Genoa Ct., H-2
Gentry Ln., E-6
Georgetown Wy., E-4
Glanola Ct., D-5
Gibbs Dr., D-3
Gigart Ct., I-5
Gilbert Ln., C-4
Gingham Ln., I-7
Glacier Lk., J-6
Glenbrook Dr., Rd., G-5
Glenbrook Ct., I-9
Glenaeags Pl., B-5
Gleneden Dr., Ct., H-5
Glenhaven St., E-6
Glenn Ct., Dr., H-6
Glenridge Ct., St., D-6
Glenview Av., E-7
Glenwood Ct., J-7
Glenwood Rd., H-5
Gilsan St., I-4
Godwin Ct., I-8
Goldfinch Ter., J-5
Goldstone Pl., I-5
Gold Creek Dr., E-9
Grabhorn I-2, 3
Grace La., F-9
Granada Dr., H-4
Granite Ct., I-5
Grayling Ln., G-5
Greenleaf Pl., F-6
Green Ln., H-7
Greenbrier Pkwy., D-5
Greensboro Wy., G-5
Greenview La., D-8
Greenway Blvd., I-7
Greenwich Dr., E-9
Greenwood Dr., B-6
Greenwood St., F-7
Griffin Dr., H-9
Griffin Pl., H-7
Griffith Dr., G-7
Guil Ct., Pl., J-5

5

Kearney St., D-7
Keas Ct., I-7
Kelly View Lp., H-3
Kemmer Rd., I-3, 4
Kemmer View Ct., I-4
Kennedy St., G-7, 8
Kensington Rd., I-9
Kentucky Pl., I-6
Kenwood Ct., E-5
Kevin Ct., C-5
Keystone Ct., H-4
Kilchis St., H-5
Kimberly Ct., H-6
King Blvd., H-7
Kingbird Dr., J-5
Kinnaman Rd., Dr., F-8
Knollcrest Dr., F-8
Knollcrest Rd., F-6
Koldich Pl., G-5
Koll Pkwy., E-5

6

La Cassell Crest Ln.
Laser Rd., F-9
Laidlaw Rd., B-4, 5, 6, 7
Lakeridge Ct., D-4
Lakeshore Ct., C-5, 6
Lakeview Dr., B-6
Lakeway La., D-4
Lakewood Ct., J-4
Lancashire Ct., D-4
Lancaster St., E-6
Lanewood St., E-6
Lansford Ct., H-6
Lantana Ct., Pl., H-6

4

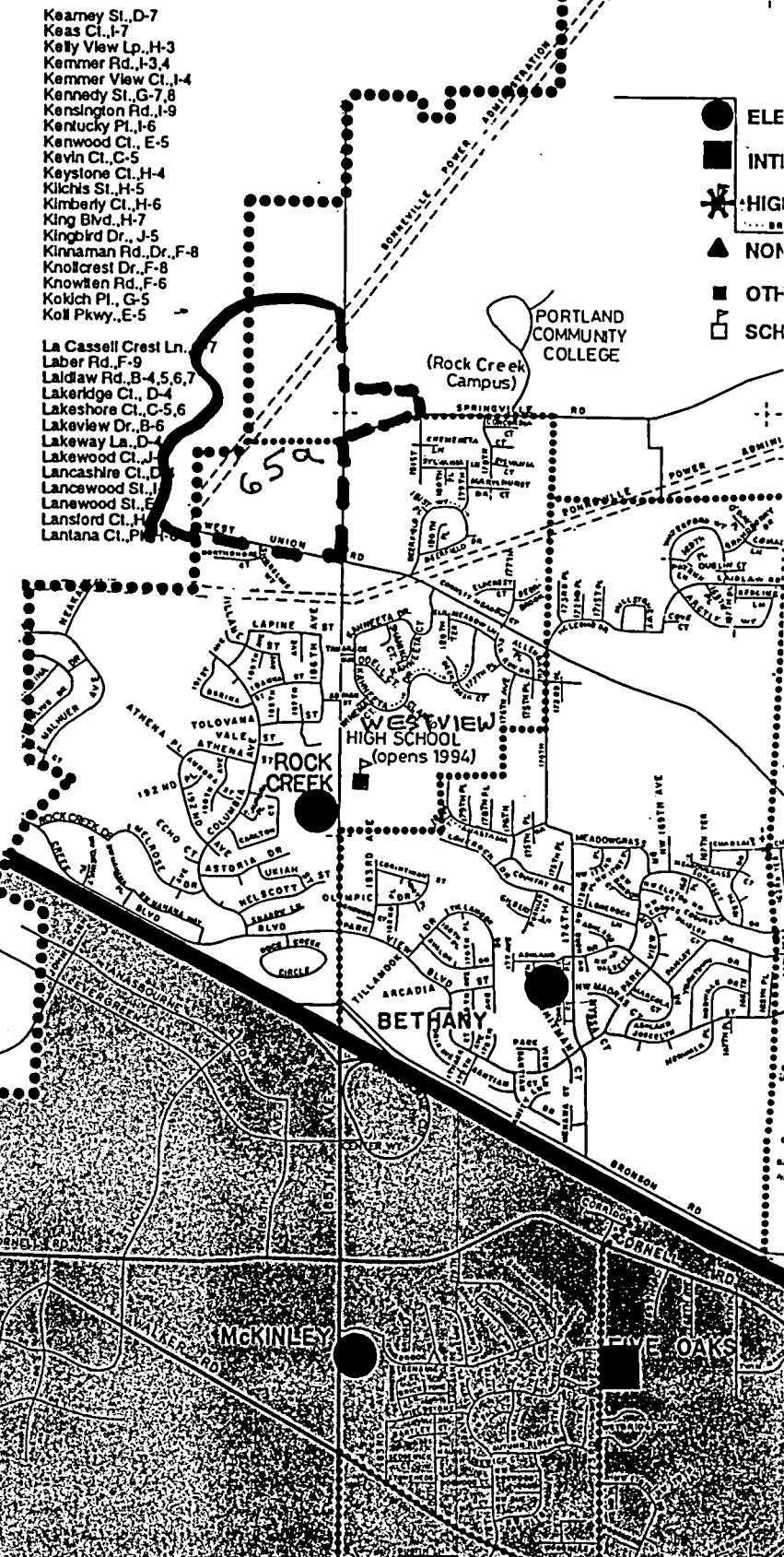
La Cassell Crest Ln.
Laser Rd., F-9
Laidlaw Rd., B-4, 5, 6, 7
Lakeridge Ct., D-4
Lakeshore Ct., C-5, 6
Lakeview Dr., B-6
Lakeway La., D-4
Lakewood Ct., J-4
Lancashire Ct., D-4
Lancaster St., E-6
Lanewood St., E-6
Lansford Ct., H-6
Lantana Ct., Pl., H-6

5

La Cassell Crest Ln.
Laser Rd., F-9
Laidlaw Rd., B-4, 5, 6, 7
Lakeridge Ct., D-4
Lakeshore Ct., C-5, 6
Lakeview Dr., B-6
Lakeway La., D-4
Lakewood Ct., J-4
Lancashire Ct., D-4
Lancaster St., E-6
Lanewood St., E-6
Lansford Ct., H-6
Lantana Ct., Pl., H-6

6

La Cassell Crest Ln.
Laser Rd., F-9
Laidlaw Rd., B-4, 5, 6, 7
Lakeridge Ct., D-4
Lakeshore Ct., C-5, 6
Lakeview Dr., B-6
Lakeway La., D-4
Lakewood Ct., J-4
Lancashire Ct., D-4
Lancaster St., E-6
Lanewood St., E-6
Lansford Ct., H-6
Lantana Ct., Pl., H-6



89

Rock Creek

Weekdays to Portland

Kaiser Sunset Medical Office	18th & Cornell Rd 52 68 88	West Union & Cornelius Pass	185th & Park View Blvd 52	Bronson & Bethany	143rd & Oak Hills Dr	Saltzman & Cornell 60 67	Barnes & Sunset Hwy 67	SW 6th & Main	NW 8th & Irving
5:21	5:25	5:34	5:41	5:47	5:51	5:56	5:59	6:15	6:21
5:51	5:56	6:06	6:13	6:19	6:23	6:30	6:35	6:52	7:00
6:11	6:16	6:26	6:33	6:40	6:45	6:53	6:58	7:21	7:29
6:25	6:30	6:40	6:47	6:54	6:59	7:07	7:12	7:35	7:43
6:37	6:42	6:52	6:59	7:06	7:11	7:19	7:24	7:47	7:55
6:52	6:57	7:07	7:14	7:21	7:26	7:34	7:39	8:02	8:10
7:14	7:19	7:29	7:36	7:43	7:47	7:54	7:58	8:17	8:25
*7:48	7:53	8:03	8:09	8:15	8:19	8:25	8:29	8:44	8:52
8:19	8:24	8:35	8:41	8:47	8:51	8:57	9:01	9:13	9:21
9:15	9:20	9:31	9:37	9:43	9:47	9:53	9:57	10:09	10:17
10:29	10:34	—	10:37	10:43	10:47	10:53	10:57	11:09	11:17
11:29	11:34	—	11:37	11:43	11:47	11:53	11:57	12:09	12:17
12:21	12:26	—	12:30	12:36	12:40	12:46	12:51	1:09	1:17
1:15	1:20	—	1:24	1:30	1:34	1:40	1:45	2:03	2:11
2:15	2:20	—	2:24	2:30	2:34	2:40	2:45	3:03	3:11
3:35	3:40	—	3:44	3:50	3:54	3:60	3:65	3:83	3:91
3:52	3:57	—	4:01	4:07	4:11	4:17	4:22	4:40	4:48
4:22	4:27	—	4:31	4:37	4:41	4:47	4:52	5:12	5:20
4:52	4:57	—	5:01	5:07	5:11	5:17	5:22	5:42	5:50
5:22	5:26	—	5:29	5:34	5:38	5:44	5:48	6:05	6:11
6:23	6:27	—	6:30	6:35	6:39	6:43	6:47	7:01	7:07
7:23	7:27	—	7:30	7:35	7:39	7:43	7:47	8:01	8:07
8:50	8:54	—	8:57	9:02	9:06	9:10	9:14	9:28	9:34

Light figures are A.M. Dark figures are P.M.

89

Rock Creek

Weekdays to Rock Creek or Kaiser Sunset

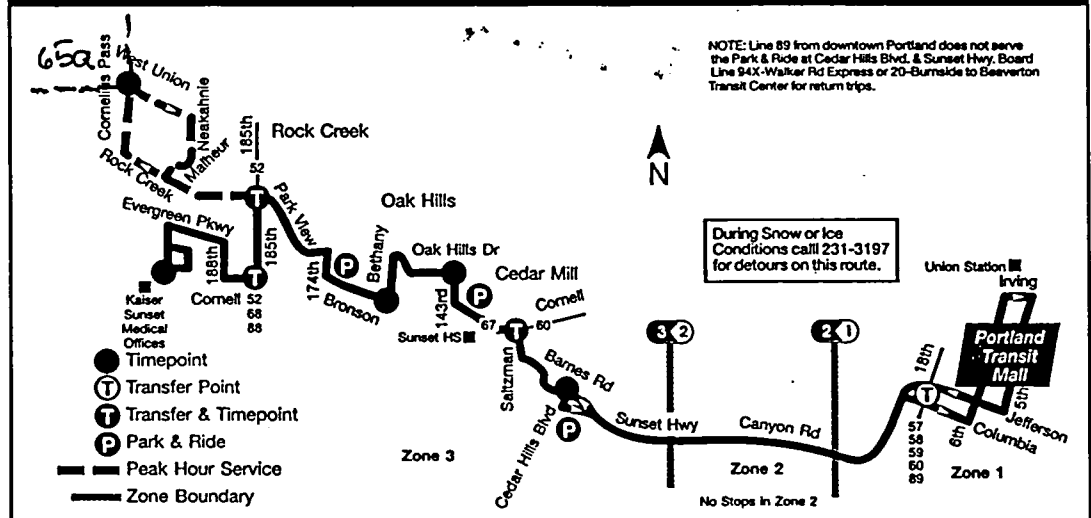
NW 8th & Hoyt	SW 6th & Stark	Barnes & Sunset Hwy 67	Saltzman & Cornell 60 67	143rd & Oak Hills Dr	Bronson & Bethany	185th & Park View Blvd 52	West Union & Cornelius Pass	18th & Cornell Rd 52 68 88	Kaiser Sunset Medical Office
6:24	6:28	6:43	6:45	6:48	6:52	6:57	—	6:59	7:02
6:54	6:59	7:17	7:20	7:24	7:28	7:33	—	7:36	7:39
7:24	7:29	7:47	7:50	7:54	7:58	8:03	—	8:06	8:09
7:50	7:55	8:13	8:16	8:20	8:24	8:29	—	8:32	8:35
8:19	8:24	8:42	8:45	8:49	8:53	8:58	—	9:01	9:04
9:21	9:26	9:42	9:45	9:49	9:53	9:58	—	10:00	10:04
10:17	10:22	10:38	10:41	10:45	10:49	10:54	—	10:56	11:00
11:17	11:22	11:38	11:41	11:45	11:49	11:54	—	11:56	12:00
12:17	12:22	12:40	12:43	12:47	12:52	12:57	—	1:00	1:04
1:17	1:22	1:40	1:43	1:47	1:52	1:57	—	2:00	2:04
2:11	2:16	2:34	2:37	2:42	2:46	2:51	—	2:54	2:58
3:11	3:16	3:34	3:37	3:42	3:47	3:53	3:59	4:00	4:04
3:37	3:42	4:00	4:03	4:08	4:13	4:19	4:25	4:26	4:30
4:06	4:12	4:33	4:36	4:41	4:46	4:52	4:58	5:00	5:04
4:29	4:35	4:58	5:01	5:06	5:11	5:17	5:23	5:25	5:29
4:49	4:55	5:18	5:21	5:26	5:31	5:38	5:45	5:47	5:51
5:00	5:06	5:34	5:37	5:43	5:49	5:56	6:04	6:06	6:10
5:12	5:18	5:46	5:49	5:55	6:01	6:08	6:16	6:18	6:22
5:36	5:41	6:04	6:07	6:13	6:19	6:26	6:34	6:36	6:40
6:08	6:13	6:36	6:39	6:45	6:51	6:58	7:06	7:08	7:12
7:07	7:11	7:27	7:30	7:36	7:43	7:49	7:57	7:59	8:03
8:07	8:11	8:28	8:31	8:37	8:43	8:49	8:57	8:59	9:03
9:34	9:38	9:55	9:58	10:04	10:10	10:17	10:25	10:27	10:31

Light figures are A.M. Dark figures are P.M.

89



ROCK CREEK



Farmington-185th Weekdays to Beaverton TC

PCC Rock Creek	185th & West Union Rd	185th & Cornell Rd	185th & Baseline	185th & Valley Highway	185th & Farmington	185th & Farmington & Murry	Beaverton Transit Center
5:18	5:21	5:25	5:30	5:33	5:38	5:41	5:48
5:48	5:51	5:55	6:00	6:03	6:08	6:11	6:18
6:15	6:18	6:22	6:26	6:30	6:36	6:40	6:48
6:29	6:33	6:39	6:44	6:49	6:57	7:02	7:11
6:48	6:52	6:58	7:03	7:08	7:16	7:21	7:30
7:11	7:15	7:21	7:26	7:30	7:39	7:44	7:53
7:48	7:50	7:55	7:59	8:03	8:10	8:15	8:23
8:16	8:20	8:25	8:29	8:33	8:40	8:45	8:53
8:46	8:50	8:55	8:59	9:03	9:10	9:15	9:23
9:16	9:20	9:25	9:29	9:33	9:40	9:45	9:53
9:46	9:50	9:55	9:59	10:03	10:10	10:15	10:23
10:16	10:20	10:25	10:29	10:33	10:40	10:45	10:53
10:46	10:50	10:55	10:59	11:03	11:10	11:15	11:23
11:16	11:20	11:25	11:29	11:33	11:40	11:45	11:53
11:42	11:45	11:52	11:57	12:02	12:09	12:15	12:23
12:12	12:15	12:22	12:27	12:32	12:39	12:45	12:53
12:42	12:45	12:52	12:57	1:02	1:09	1:15	1:23
1:12	1:15	1:22	1:27	1:32	1:39	1:45	1:53
1:48	1:51	1:54	1:58	2:03	2:10	2:15	2:23
2:06	2:10	2:19	2:24	2:29	2:36	2:42	2:50
2:26	2:30	2:37	2:41	2:45	2:52	2:57	3:05
2:40	2:44	2:51	2:56	3:01	3:08	3:14	3:23
3:16	3:19	3:26	3:31	3:36	3:44	3:49	3:57
3:48	3:51	3:58	4:03	4:08	4:16	4:21	4:30
4:06	4:09	4:16	4:21	4:26	4:34	4:39	4:47
4:29	4:32	4:39	4:44	4:49	4:57	5:02	5:10
4:40	4:44	4:51	4:56	5:01	5:08	5:14	5:23
4:57	5:01	5:08	5:13	5:18	5:25	5:31	5:40
5:29	5:34	5:41	5:46	5:51	5:58	6:04	6:13
5:45	5:49	5:55	5:59	6:03	6:10	6:15	6:23
6:16	6:20	6:25	6:29	6:33	6:39	6:45	6:53
6:54	6:58	7:03	7:07	7:10	7:16	7:21	7:30
7:29	7:34	7:39	7:43	7:46	7:52	7:57	8:05
7:54	7:58	8:03	8:07	8:10	8:16	8:21	8:30
8:29	8:34	8:39	8:43	8:46	8:52	8:57	9:05
8:54	8:58	9:03	9:07	9:10	9:16	9:21	9:30
9:23	9:28	9:34	9:37	9:42	9:48	9:53	10:02
10:23	10:28	10:34	10:37	10:42	10:48	10:53	11:02

Light figures are A.M. Dark figures are P.M.

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⚠ All trips are lift-equipped.

Farmington-185th Weekdays to PCC-Rock Creek

Beaverton Transit Center	185th & Farmington	185th & Farmington & Murry	185th & Baseline	185th & Valley Highway	185th & Farmington	185th & Farmington & Murry	185th & West Union Rd	PCC Rock Creek
5:57	6:03	6:06	6:11	6:14	6:18	6:22	6:25	6:25
6:25	6:32	6:36	6:44	6:49	6:53	6:59	7:03	7:03
6:44	6:51	6:55	7:03	7:08	7:12	7:18	7:22	7:22
7:01	7:08	7:12	7:20	7:25	7:29	7:35	7:39	7:39
7:24	7:31	7:34	7:40	7:44	7:48	7:53	7:57	7:57
7:42	7:49	7:52	7:58	8:02	8:06	8:11	8:15	8:15
8:01	8:08	8:11	8:17	8:21	8:25	8:30	8:34	8:34
8:31	8:38	8:41	8:47	8:51	8:54	8:59	9:02	9:02
9:01	9:08	9:11	9:17	9:21	9:24	9:29	9:32	9:32
9:31	9:38	9:41	9:47	9:51	9:54	9:59	10:02	10:02
10:01	10:08	10:11	10:17	10:21	10:24	10:29	10:32	10:32
10:31	10:38	10:41	10:47	10:51	10:54	10:59	11:02	11:02
11:01	11:08	11:11	11:17	11:21	11:24	11:29	11:32	11:32
11:31	11:38	11:41	11:47	11:51	11:54	11:59	12:02	12:02
12:01	12:08	12:11	12:17	12:21	12:24	12:29	12:32	12:32
12:31	12:38	12:41	12:47	12:51	12:54	12:59	1:02	1:02
1:01	1:08	1:11	1:17	1:21	1:24	1:29	1:32	1:32
1:31	1:38	1:41	1:47	1:51	1:54	1:59	2:02	2:02
2:01	2:08	2:11	2:17	2:21	2:24	2:29	2:32	2:32
2:31	2:38	2:41	2:47	2:51	2:54	2:59	3:02	3:02
3:01	3:08	3:11	3:17	3:21	3:24	3:29	3:32	3:32
3:31	3:38	3:41	3:47	3:51	3:54	3:59	4:02	4:02
4:01	4:08	4:11	4:17	4:21	4:24	4:29	4:32	4:32
4:31	4:38	4:41	4:47	4:51	4:54	4:59	5:02	5:02
4:51	4:58	5:04	5:12	5:17	5:22	5:29	5:32	5:32
5:13	5:21	5:26	5:34	5:39	5:44	5:50	5:54	5:54
5:21	5:29	5:34	5:42	5:47	5:52	5:58	6:02	6:02
5:51	5:59	6:04	6:12	6:17	6:22	6:28	6:32	6:32
6:11	6:19	6:24	6:32	6:37	6:42	6:48	6:52	6:52
6:35	6:42	6:48	6:51	6:55	6:59	7:04	7:07	7:07
7:02	7:08	7:11	7:16	7:19	7:23	7:27	7:30	7:30
7:32	7:38	7:41	7:46	7:49	7:53	7:57	8:00	8:00
8:02	8:08	8:11	8:16	8:19	8:23	8:27	8:30	8:30
8:32	8:38	8:41	8:46	8:49	8:53	8:57	9:00	9:00
9:02	9:08	9:11	9:16	9:19	9:23	9:27	9:30	9:30
9:32	9:38	9:41	9:46	9:49	9:53	9:57	10:00	10:00
10:02	10:08	10:11	10:16	10:19	10:23	10:27	10:30	10:30
11:02	11:08	11:11	11:16	11:19	11:23	11:27	—	—

Light figures are A.M. Dark figures are P.M.

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⚠ All trips are lift-equipped.

Farmington-185th Saturday to Beaverton TC

PCC Rock Creek	185th & West Union Rd	185th & Cornell Rd	185th & Baseline	185th & Valley Highway	185th & Farmington	185th & Farmington & Murry	Beaverton Transit Center
7:21	7:24	7:28	7:32	7:36	7:42	7:46	7:53
8:21	8:24	8:28	8:32	8:36	8:42	8:46	8:53
9:14	9:17	9:22	9:27	9:32	9:39	9:44	9:52
10:14	10:17	10:22	10:27	10:32	10:39	10:44	10:52
11:14	11:17	11:22	11:27	11:32	11:39	11:44	11:52
12:14	12:17	12:22	12:27	12:32	12:39	12:44	12:52
1:14	1:17	1:22	1:27	1:32	1:39	1:44	1:52
2:14	2:17	2:22	2:27	2:32	2:39	2:44	2:52
3:14	3:17	3:22	3:27	3:32	3:39	3:44	3:52
4:14	4:17	4:22	4:27	4:32	4:39	4:44	4:52
5:14	5:17	5:22	5:27	5:32	5:39	5:44	5:52
6:29	6:32	6:37	6:41	6:45	6:51	6:55	7:02
7:29	7:32	7:37	7:41	7:45	7:51	7:55	8:02
8:29	8:32	8:37	8:41	8:45	8:51	8:55	9:02
9:29	9:32	9:37	9:41	9:45	9:51	9:55	10:02

⚠ All trips are lift-equipped.

Farmington-185th Saturday to PCC-Rock Creek

Beaverton Transit Center	185th & Farmington	185th & Farmington & Murry	185th & Baseline	185th & Valley Highway	185th & Farmington	185th & Farmington & Murry	185th & West Union Rd	PCC Rock Creek
7:02	7:09	7:13	7:18	7:21	7:26	7:31	7:34	7:34
8:02	8:09	8:13	8:18	8:21	8:26	8:31	8:34	8:34
9:02	9:09	9:13	9:18	9:21	9:26	9:31	9:34	9:34
10:02	10:09	10:13	10:18	10:21	10:26	10:31	10:34	10:34
11:02	11:09	11:13	11:18	11:21	11:26	11:31	11:34	11:34
12:02	12:10	12:15	12:22	12:27	12:33	12:39	12:42	12:42
1:02	1:10	1:15	1:22	1:27	1:33	1:39	1:42	1:42
2:02	2:10	2:15	2:22	2:27	2:33	2:39	2:42	2:42
3:02	3:10	3:15	3:22	3:27	3:33	3:39	3:42	3:42
4:02	4:10	4:15	4:22	4:27	4:33	4:39	4:42	4:42
5:02	5:10	5:15	5:22	5:27	5:33	5:39	5:42	5:42
6:02	6:09	6:14	6:20	6:24	6:29	6:34	6:37	6:37
7:02	7:08	7:12	7:17	7:20	7:25	7:30	7:33	7:33
8:02	8:08	8:12	8:17	8:20	8:25	8:30	8:33	8:33
9:02	9:08	9:12	9:17	9:20	9:25	9:30	9:33	9:33
10:02	10:08	10:12	10:17	10:20	10:25	10:30	10:33	10:33

Light figures are A.M. Dark figures are P.M.

Scheduled times MAY BE CHANGED WITHOUT NOTICE by as much as three minutes to relieve overcrowding or to adjust to traffic conditions.

⚠ All trips are lift-equipped.

Farmington-185th Sunday to Beaverton TC

185th & West Union Rd	185th & Cornell Rd	185th & Baseline	185th & Valley Highway	185th & Farmington	185th & Farmington & Murry	Beaverton Transit Center
9:23	9:28	9:32	9:36	9:41	9:45	9:52
10:15	10:22	10:27	10:32	10:39	10:44	10:52
11:15	11:22	11:27	11:32	11:39	11:44	11:52
12:15	12:22	12:27	12:32	12:39	12:44	12:52
1:15	1:22	1:27	1:32	1:39	1:44	1:52
2:15	2:22	2:27	2:32	2:39	2:44	2:52
3:15	3:22	3:27	3:32	3:39	3:44	3:52
4:15	4:22	4:27	4:32	4:39	4:44	4:52
5:15	5:22	5:27	5:32	5:39	5:44	5:52
6:23	6:28	6:32	6:36	6:41	6:45	6:52

Light figures are A.M. Dark figures are P.M.

Scheduled times MAY BE CHANGED WITHOUT NOTICE by as much as three minutes to relieve overcrowding or to adjust to traffic conditions.

⚠ All trips are lift-equipped.

Farmington-185th Sunday to 185th & Springfield

Beaverton Transit Center	185th & Farmington	185th & Farmington & Murry Sq	185th & Baseline	185th & Valley Highway	185th & Farmington	185th & Farmington & Murry	185th & West Union Rd
9:02	9:08	9:11	9:17	9:20	9:26	9:31	9:31
10:02	10:08	10:11	10:17	10:20	10:26	10:31	10:31
11:02	11:08	11:11	11:17	11:20	11:26	11:31	11:31
12:02	12:08	12:11	12:17	12:20	12:26	12:31	12:31
1:02	1:08	1:11	1:17	1:23	1:26	1:36	1:36
2:02	2:08	2:13	2:18	2:23	2:29	2:34	2:41
3:02	3:10 _u	3:15	3:22	3:27	3:34	3:41	3:41
4:02	4:10	4:15	4:22	4:27	4:34	4:41	4:41
5:02	5:10	5:15	5:22	5:27	5:34	5:41	5:41
6:02	6:09	6:13	6:19	6:23	6:29	6:35	6:35
7:02	7:09	7:13	7:19	7:23	7:29	7:35	7:35

PHONE NUMBERS

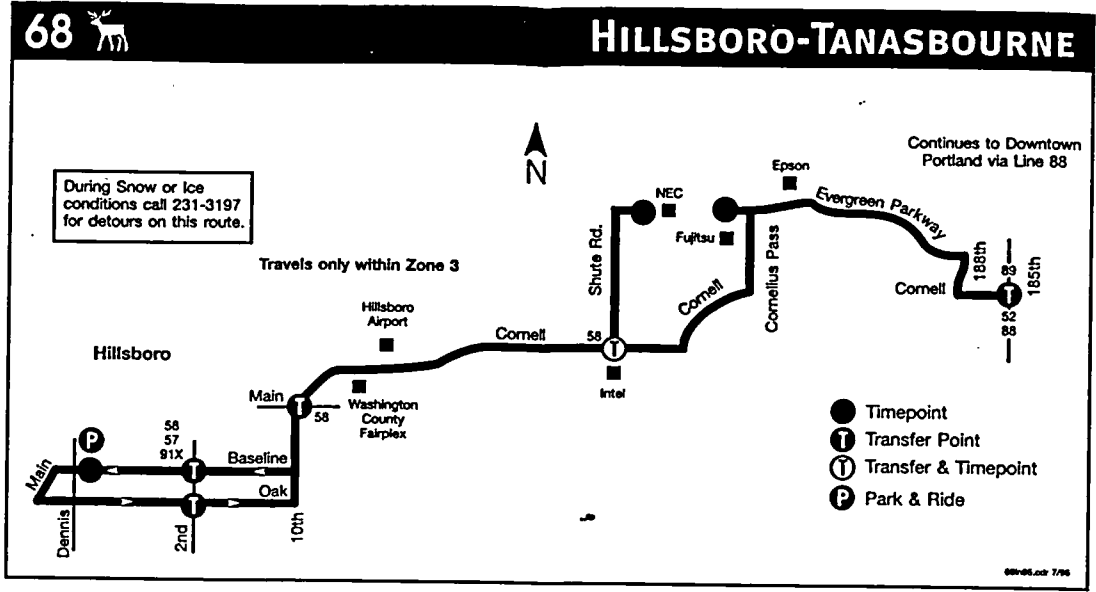
238-RIDE (238-7433)
238-5811
239-3092
Citizen Information 238-4952
227-7665
239-3044
238-4855
220-1016
<http://www.tri-met.org/>
comments@tri-met.org

SERVICE CENTERS

Tickets, Monthly Passes
available weekdays at Pioneer
9 a.m.-5 p.m., and at 4012
St. Victor, 8:00 a.m.-5:00 p.m.
LOCATIONS:
10th, Hillsboro
Cedar Hills Blvd.
10th
Walker Rd.
5 NW Cornell Road
5 NW Farmington Rd.
Hwy.
Hwy., Hillsboro
85
Main, Hillsboro

TICKETS BY MAIL

out pre-paid program and
tickets in the mail every
E, TTY 238-5811, to find
pass or tickets by mail.
sign up for the monthly pre-



68
Hillsboro-Tanasbourne
Weekdays to Portland

Baseline & Dennis	57 58 91X Hillsboro	2nd & Oak Hillsboro	57 58 91X 10th & Main Hillsboro	58 NEC & Shute Road	Evergreen Parkway at Fujitsu	Evergreen Parkway & 185th Ave 88 89	185th & Cornell Rd 52 88 89	SW 6th & Main
6:05	6:09	6:13	6:24	6:34	6:40	6:44	7:10	
3:17	3:22	3:27	3:36	3:48	3:54	3:56	4:20	
4:10	4:15	4:20	4:29	4:41	4:47	4:49	5:10	

Light figures are A.M. Dark figures are P.M.
Scheduled times MAY BE CHANGED WITHOUT NOTICE by as much as three minutes to relieve overcrowding or to adjust to traffic conditions.
& Buses on this line are not lift equipped. Lift users who want weekday alternative accessible service along this route, call Senior & Disabled Information at 238-4952, TTY 238-5811, FAX 239-3092 weekdays 7:30am-5:30pm or ask your bus driver.

68
Hillsboro-Tanasbourne
Weekdays to Hillsboro

SW 5th & Stark	18th & Jefferson	Cornell & Bethany P&R	185th & Cornell Rd 52 88 89	Evergreen Parkway at Fujitsu	NEC & Shute Road	10th & Main Hillsboro	2nd & Baseline Hillsboro	57 58 91X Baseline & Hillsboro
6:02	6:09	6:21	6:24	6:32	6:39	6:47	6:52	6:53
6:41	6:48	7:00	7:03	7:11	7:18	7:26	7:31	7:32
3:05	3:16	3:29	3:32	3:40	3:47	3:56	4:01	4:02

Light figures are A.M. Dark figures are P.M.
Scheduled times MAY BE CHANGED WITHOUT NOTICE by as much as three minutes to relieve overcrowding or to adjust to traffic conditions.
Note: All trips travel between Portland Mall and SW 185th & Cornell via Line 88. Board Line 88 on the Transit Mall at Orange Deer stops.
& Buses on this line are not lift equipped. Lift users who want weekday alternative accessible service along this route, call Senior & Disabled Information at 238-4952, TTY 238-5811, FAX 239-3092 weekdays 7:30am-5:30pm or ask your bus driver.

URBAN RESERVE DESIGNATION DECISION RECORD

RECORD NUMBER: 112196-53 (A)

DESCRIPTION OF RECORD

PLACEHOLDER: Map # 55

URBAN RESERVE DESIGNATION DECISION RECORD

RECORD NUMBER: 11 2196-53(B)

DESCRIPTION OF RECORD

PLACEHOLDER: Map #65 and Large Aerial
Map

(URSA # 65) prob.

Hillsboro

Washington Cty

TUALATIN VALLEY

Economic Development Corporation

10200 SW Nimbus, Suite G-3
Tigard, Oregon 97223
620-1142 (Ph.) • 624-0641 (Fax)

112196-54

1996 Housing & Land Use Committee

Doug Draper, Chairman
Genstar Land Company NW

November 21, 1996

Pam Baker
Dawson Creek Park/Forum Properties

Kevin Capuzzi
Pacific Land Management

Chris Cocker
David Evans & Associates

Ron Desrosiers
Tuality Community Hospital

Greg Hathaway
Davis Wright Tremaine

Cindy Hirst
Main Resource Services

Art Lewis
Hillier Associates

Mike Lilly
Attorney At Law

Millie Little Denton
Fidelity National Title Company

Dennis Lively
Unified Sewerage Agency

Robert Meyer
Robert E. Meyer Consultants

Tim Ramis
O'Donnell Ramis Crew Corrigan & Bachrach

John Rosenberger
Washington County Land Use & Transportation

Tim Schaueremann
Schaueremann Insurance

Mike Schmid
W&H Pacific

Bill Seal
Barbara Sue Seal Properties

Mark Turpel
Metro

Tom Van Thiel
TVT Die Casting & Manufacturing

Mike Walker
Tualatin Valley Water District

Chris Watson
First American Title Insurance

Bob Yakas
Otak, Incorporated

Janet Young
City of Tualatin

The Honorable Wes Yuen
Beaverton City Council

Mary Tobias, Ex Officio
TVEDC President

The Honorable Jon Kvistad, Presiding Officer
Members of the Metro Council
Metro Regional Center
600 NE Grand Avenue
Portland, OR 97232-2736

Dear Mr. Presiding Officer and Members of the Council:

On behalf of the TVEDC Housing and Land Use Committee, I would like to thank you for this opportunity to comment on the Urban Reserve Area designation issue before you today. The Committee would particularly like to thank the Presiding Officer, members of the Council, the Executive Officer and members of the Growth Management staff who have taken the time to listen to our issues, educate us on the regional perspective and work in partnership toward a win-win final decision. Because public/private partnership is one of principles upon which our programs are founded, this level of inter-agency cooperation is greatly appreciated.

TVEDC has submitted written testimony on the subject before you on prior occasions and asks you to refer to that testimony in your review of the record.

Our testimony today will be in support of the process of how to decide where to draw the line between today's choices for designating land for urban reserves and the same choices that will occur in five to seven years during the next periodic review cycle.

How We Got to Where We Are Today (Excerpted from Urban Reserve Study Areas Report . Metro Growth Management Services Department, December 4, 1995, p.1)

- 1994 -- Metro begins process of designating land outside the current UGB as urban reserve study areas (URSAs) as a means of managing the Urban Growth Boundary (UGB) for the metropolitan area.
 - Urban Reserves are intended to clarify where the UGB would move if there is a "need."

-- This process was begun as the first step in complying with the State's Urban Reserve Rule

- December 1994 -- Metro adopts by resolution about 22,000 acres as URSAs.
- -- Sites considered for inclusion on the URSA list were subjected to an aggressive analysis and were rated against one another for suitability for inclusion as an URSA. The rating system criteria included: Proximity to the current UGB, Access to Arterials, Proximity to regional centers, Terrain, Soil Classification, Exception Lands and Jobs/Housing Balance.
- 1995 -- Metro conducted public hearings on the URSAs and made changes to the original recommendations based on public input, information from local governments and Metro Council and settled on the 23,000 acres currently designated URSAs.
- 1995 to 1996 -- Further review and analysis was conducted on the URSAs by Metro Growth Management staff, the Executive Officer's staff and local government officials.
- November 1995 -- The Growth Management Committee agreed on a set of Urban Reserve Study Area Criteria against which the URSAs would be evaluated for recommending land for urban expansion, as needed.
- September 1996 -- The Executive Officer's Recommendation on Urban Reserves is released for review and comment.

The Region Crossed the Rural Land vs. Urban Land Threshold in December 1994.

TVEDC asks you to seriously consider where you are at this point in time. After reviewing the process and the documents that provide background and technical support for today's decisions, it is clear that you took the urban reserve study process very seriously. None of your decisions during this time has been capricious, rather your commitment to decision-making based on objective analysis is obvious to anyone following this process.

For that very reason, the citizens of this region can only conclude that when the initial decisions to designate some lands Urban Reserve Study Areas were made, the region crossed a land use Rubicon. The very act of differentiating these lands as URSAs, rather than rural, through evaluation with objective criteria and rankings was the documentation of the region's determination that these lands are the areas most suited to future urban use.

The Only Question That Remains

Based on the methodical analytical approach to the issues of UGB expansion that was put in motion with the URSA selection methodology, the only question that remains is that of timing.

When do we need to bring land into the boundary and of the 23,000 acres in the final URSA designation, which of those lands meet the region's criteria for the short, middle and long term.

TVEDC Recommendation

TVEDC's Housing and Land Use Committee endorses the Presiding Officer's proposal that the region start with the recognition that the full 23,000 acres are the Urban Reserves. Metro can then begin the process of evaluating those lands based on the issues that are most important to achieving the goals of 2040. We suggest that the evaluation should favor sites where:

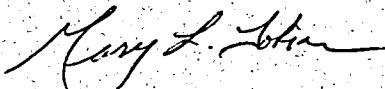
- urban infrastructure can be most easily, economically and efficiently provided to the land,
- the land inclusion within the boundary would help the region to achieve a healthy jobs/housing balance within communities which would help to mitigate cross regional travel from home to work,
- access to regional and town centers or main streets can be maximized.

The region should 1) measure the needs of the counties and cities within the boundary for jobs, housing, schools, and space for public and private enterprise on a jurisdiction by jurisdiction basis, 2) evaluate these needs in light of the available land within the boundary, 3) evaluate the need for additional land by using the urbanization factors to judge timing of expansion - if any is needed in specific areas, 4) add land to the UGB in those URSA areas where the analysis clearly demonstrates a defensible need for expansion.

It is our opinion that this kind of approach built upon the process that you began in 1994 will prove the best way to achieve our common goal -- orderly, managed, healthy, urban economic expansion.

Again, thank you for this opportunity to comment and particularly for your willingness to work as a partner with TVEDC's membership.

Sincerely,



Mary L. Tobias
President

11296-55

TO: METRO Council, METRO's Executive Officer Mike Burton and
METRO's Director of Growth Management Services John Fregonese.

11-21-96

FROM: Robert J. Thomas 2563 Pimlico Drive, West Linn, OR 97068

SUBJECT: Written public testimony by Robert J. Thomas on the subject of METRO's advertised upcoming decision on formal establishment of "Urban Reserves" throughout its areas of jurisdiction and on its upcoming decision to encircle, in the immediate future, a portion of such Reserves within some expanded movements outward of the UGB. My testimony focuses on opposition to such formal establishment of Urban Reserve areas at this time and on opposition to any expansion of the present UGB at this time.

(A)

I would first ask that the above addressed METRO officials refresh their memory in regard to three prior submittals of mine related to this subject. Those three submittals are attached, and they are dated 11-29-95, 1-18-96 and 1-28-96. Those three submittal cover nearly everything that I would again say to you today in regard to the above subject. They nearly cover my entire argument that I would put forth to you today in opposition to your advertised upcoming decisions on Urban Reserves and expansion of the UGB.

(B)

I still contend that METRO has a lot more work to do from the standpoint of making thorough and sound studies of inventories of developable and redevelopable lands within the present UGB. The studies done so far in this regard are too cursory and smack too much of guesstimates rather than being based on sound studies and supportable knowledge.

Also, if there is to be any METRO "Master Plan" and "Financial Plan" for potential urbanization of areas outside the present UGB, those should certainly be put together first, along with realistic estimates of the costs to provide urban services to such areas, and assignment of those costs to be up front funded entirely by growth itself instead of by residents within the present UGB. Certainly, no decisions on Urban Reserve designations or UGB expansions should be made until after the above inventories and Plans are completed and made available to the public far enough ahead of time to allow for their thorough review and commentary by the public.

(C)

It would really be very authoritarian and irresponsible for METRO to proceed now to impose decisions about Urban Reserves and expansion of the UGB without first having done all the work required to competently and thoroughly make such inventories and Master and Financial Plans that are the vital essentials to be accomplished first before making any such decisions. Proponents of doing it backwards, and putting the cart before the horse, such as METRO's developer Councilor, Don Morrisette, should not be allowed to carry the day in accord with his vision. Much more sound and much less conflict of interest oriented judgments should prevail and save the day against the advertised and premature plans by METRO to proceed now to shortly make decisions on Urban Reserve designations and expansions of the UGB. Respect your responsibilities to your positions and to the public and put the horse before the cart. Don't let pleasing the development industry be your primary concern, and put the cart before the horse. You will lose the respect of the vast majority of the public if you do that. Be realistic and responsible in meeting your obligations to the vast majority of the public in regard to these very momentous and ultimately very costly decisions.

(D)

In regard to the specifics and impacts of this upon West Linn, the town where I live, you would realize through any competent and comprehensive Master Plan and Financial Plan that urbanizing any of the present rural area of the Stafford Triangle would be extremely expensive on the basis of cost per acre. The three towns that surround the Stafford Triangle, namely West Linn, Lake Oswego and Tualitan, along with the county CPO in the Triangle have formed an alliance and all resolved to oppose urbanization of the Triangle, and have submitted opposition resolutions to METRO. Since the Triangle involves so much hilly ground and completely lacks any existing infrastructure that could effectively serve urbanization, the urbanization of the Triangle would be extremely expensive, as substantiated by Lake Oswego's planning Director Tom Coffee. The residents of these three cities do not want to be stuck with the huge cost of urbanizing the Stafford Triangle, even if it's done gradually at first by developers getting their foot in the door now.

Expanding the UGB now around just parts of the Stafford Triangle, sets the stage for ongoing and ultimate urbanization of the entire Triangle, because the domino theory will be perpetually used by developers and those land owners just outside a UGB line who want to make big bucks by selling their rural land to developers. That developer oriented theory always says that lands just bordering any UGB can be easily urbanized by just extending services a short distance and thereby justify expansion of the UGB to enclose such lands. That sets in motion a continual land consuming and urbanizing machine, providing it's going to be business as usual where residents within the UGB pay most of the costs to continue urbanizing areas outside whatever UGB line temporarily exists at the time.

If on the other hand, developers and new growth inhabitants had to up front fund and pay these huge costs, we would no longer be afflicted with the explosive growth that is eating up land and destroying the region's quality of life at an unprecedented rate, due not only to subsidizing the development industry but also through encouraging the influx of large corporations who are being enticed here with big tax loopholes and free rides on subsidized infrastructure to serve them and their imported work forces at the cost of billions of dollars to the region' tax and rate payers.

METRO, as it is operating now and through indications of how it will continue to operate in the future is becoming nothing but an implementation arm of the big commercial, industrial, real estate and money lending beneficiaries of growth. It is not right that METRO should be serving them instead of protecting the financial and quality of life interests of the region's average tax and rate payers. METRO can still change its ways and start to serve and protect the region's tax and rate payers by doing its proper and responsible job as I've indicated above, instead of proceeding now as it plans.

We must put an end to the madness of subsidized growth and its inherently destructive nature from the standpoints of its extremely negative financial and quality of life impacts upon the average tax and rate payer. If METRO continues to gloss over, cover up, ignore and dismiss these devastating financial impacts, as if they were someone else's responsibility to face up to and solve, then I believe this will generate an organized citizen movement to abolish METRO as it exists today, and stop policies, also now endorsed and engaged in by nearly all elected and appointed officials in the region's various governmental entities, to entice influx of growth through free rides upon the backs of the region's tax and rate payers.

(E)

Specifically, in regard to the prior request to METRO by West Linn's Mayor Jill Thorn to place 160 acres (METRO labels it as 138 acres) bordering West Linn's present UGB along Day and Rosemont

3

Roads into Urban Reserve Status for ultimate encirclement by expanding our UGB, my opposition to that remains. It is a completely unnecessary request that she has made. West Linn doesn't need it for schools and parks as she claims, nor does it need for residential or commercial development or a Public Facility Center. (See my three previous attached submittals.) A middle school building is now planned to be placed within the present UGB at corner of Day and Rosemont, so it can be served with water and sewer without having to expand the UGB. There is no need for that 138 acres to be within the UGB, and West Linn has many years worth (exceeding 20 years) of combined developable lands within its city limits and its FUA area within its present UGB. The vast majority of the public in West Linn does not desire that 138 acres, and to put it in Urban Reserve Status as a precursor to encircling it with an expanded UGB flies in the face of the spirit and intent of our city charter which requires all annexations outside the present UGB be referred to the voters. Please honor the facts and our city charter and not honor our Mayor's request for that added acreage. We don't need it for any reason.

Robert J. Thomas

COALITION FOR A LIVABLE FUTURE

CLF Policy Statement

on

Urban Reserve Designation and the UGB

November 21, 1996

The Coalition for a Livable future sees no demonstrated need for a UGB expansion at this time. The Portland metropolitan area is one of the few urban regions in the U.S. with a meaningful Urban Growth Boundary (UGB) that encourages a compact development pattern. The UGB makes our region more livable by preserving land for commercial farming and forestry outside the UGB, while directing residential, commercial, and industrial investment inward. The UGB, along with other policies in the Metro Region 2040 Growth Concept and in the statewide planning program, is critical to the public and private efforts and investments which keep our urban and neighborhood centers economically healthy and livable. These same policies also ensure that natural areas are close and accessible.

The success story of our UGB demands that the Metro Council's decision on urban reserves be conservative, in order to build on that success, to show that the region is serious about focusing urbanization inside the UGB, and to support our agricultural and forestry industries.

The Coalition for a Livable Future does not support expansions of the UGB in the near future, for several reasons. First, at this moment there is no demonstrated need for a UGB expansion. Second, we believe a tight UGB is essential to create momentum for the changes that need to take place in our region to avoid the destructive development patterns of so many other urban areas. That is, we wish to focus development toward the existing urbanized area, so that we make full and efficient use of existing infrastructure and services, revitalize and maintain inner neighborhoods, and protect our natural resources.

In addition, we believe that no urban expansion should occur on land planned and zoned for exclusive farm or forest use, unless under exceptional circumstances that leave no other alternative.

At the time when a UGB expansion has been demonstrated to be needed, we believe that any such expansion must help local governments conform to the Region 2040 Growth Concept of developing a compact, equitable, and sustainable metropolitan region.

Any land brought into the UGB must adhere to stringent criteria so it is developed in conformance with the principles behind the Region 2040 Growth Concept. The development that takes place on such land should represent the best examples of what we want to happen in the region.

Therefore, the urban reserve decision, and any proposal for UGB expansion (assuming the proposal has demonstrated a compelling need for expansion based on 2040 principles), should be subject to three stringent tests at Metro. These tests are:

Test Number One: Demonstrate that the local jurisdiction(s) is implementing all aspects of the Region 2040 Growth Concept, including all functional plans and the Regional Framework Plan (RFP)

A fundamental prerequisite for any Urban Reserve designation or proposed UGB expansion is that the local jurisdictions involved be fully implementing the principles of the Region 2040 Growth Concept in a documentable and good-faith manner. Without meeting this basic test, no Urban Reserve designation or UGB expansion should move forward.

Test Number Two: Demonstrate how the urban reserve designation or UGB expansion will support local and subregional efforts to promote compact, equitable, and sustainable communities

The next test is to determine whether there is a need for additional urban land. Any designation of urban reserves or UGB expansion must be based on the following:

- Developing well-connected, local street networks necessary to achieve the density and transportation goals of 2040 within a given community. This is not a justification for large-scale highway projects between communities, like the Western Bypass Freeway;
- Improving the affordable housing mix at the local, county or subregional level, especially increasing the number of affordable units close to jobs. Please note that this is very different from the "trickle-down-affordability" espoused by some developers as a justification for a large UGB expansion. That vision would result in the same low-density sprawl and social/economic abandonment of the urban core that has so devastated other U.S. metropolitan areas. Also, we would expect that other alternatives, such as rezoning surplus industrial land for housing, upzoning land for a full range of housing types, and other changes within the existing local UGB be infeasible or insufficient to meet the need before a UGB expansion would be considered;
- Improving, protecting or establishing stormwater management, groundwater protection, enhanced Greenspace or park protection and management, and other environmental protections on important lands adjacent to the UGB. This assumes that the local jurisdiction can provide improved oversight by incorporating these lands into its UGB;
- Creating a landscape-based transition between urban and non-urban uses, based on topographic features, streams, wetlands, floodplains, and forested areas. This creates landscape-oriented transitions between communities as well as between residential and other urban areas and neighboring farm and forest activities

Test Number Three: Adhere to a strict set of expansion and development criteria designed to ensure that development is consistent with the Region 2040 Growth Concept

The third test is to show how a proposed UGB expansion would be developed. All proposed UGB expansions and development on those expansions must adhere to the following criteria. We recommend that Metro, in its Urban Reserve decision, establish the process by which urban reserves will be "master planned" prior to coming in to the UGB so that these criteria are met. (This assumes that a need for expansion – based on 2040 principles – has been clearly demonstrated.)

- Provide an enforceable master-plan to ensure that development in the expanded area conforms to the principles of the Region 2040 Growth Concept, including functional plans and the RFP;
- Meet significant inclusionary zoning requirements for affordable housing;
- Remove floodplains, flood prone soils, wetlands, stream corridors, and steep slopes over 25% from the buildable lands inventory and develop policies to ensure these lands are not developed or are developed at

reduced densities which will ensure the protection of the full range of their functions and values;

- Protect locally and regionally significant natural resources (e.g. fish and wildlife habitat, local and regional trail systems, scenic resources, open space, riparian areas, archaeological resources, etc.). Protection and long term management strategies must be done prior to rezoning so that the underlying zone reflects the natural resource designation;
- Provide regional, county and local decision-makers with a clear picture of how the proposed expansion implements the Region 2040 Growth Concept, the Urban Growth Management Functional Plan and the Regional Framework Plan;
- Evaluate transportation and other infrastructure costs;
- Complement the Regional Center/Town Center concept and other key elements of the 2040 plan;
- Be transit, bicycle, and pedestrian oriented;
- Provide for a mix of jobs, housing, and commercial uses so that we create communities rather than subdivisions;
- Contribute to regional and local affordable housing strategies;
- Meet Region 2040 density goals and provide a variety of housing types;
- Include necessary schools, parks and public facilities with site designs that are supportive of Region 2040;
- Ensure the development of living wage jobs; and
- Not contribute to disinvestment in existing communities.

In conclusion, Metro shall not bring Urban Reserve land into development until these points are met under a tight and comprehensive process.

Questions or comments? Please contact:

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November 21, 1996

Metro Council
600 NE Grand Avenue
Portland, OR 97232

Re: Urban Reserve Designation

Dear Chairman Kvistad and Council Members:

1000 Friends of Oregon represents over 5000 Oregonians, many of whom live and work in the Portland metropolitan region. We urge you to designate a conservative urban reserve, which contains little if any farm and forest lands, for both policy and legal reasons.

Policy Reasons

Discussion of the UGB - whether it will expand, by how many acres, and the size of the urban reserves - is often a distraction from the real issue: are we serious about using our existing urban land supply more efficiently, fully capturing our investments in existing infrastructure and services, revitalizing and maintaining healthy neighborhoods, protecting natural resources, minimizing increases in traffic congestion, and preserving farm and forest lands?

This Council has already said "yes" - through adoption of the RUGGOs, Region 2040 Growth Concept, and the Functional Plan - to achieving a compact urban form, something we only *partially* have now. And now, you must show whether you are really committed to *implementing* the Growth Concept and Functional Plan, through maintaining a tight UGB and a small amount of urban reserves. Because, if you simply designate a large amount of urban reserves, you are sending a message to the market and to citizens, that the UGB is not a real tool in creating a livable region, but rather, that at the slightest pressure, it will expand, so cities and neighborhoods really don't have to break a sweat to try to grow better and more efficiently.

Legal Reasons

We believe the legal framework under which you must make the urban reserve decision supports, and indeed compels, this policy conclusion. In particular, it leads to the conclusion that the urban reserve should contain little if any farmland. This decision is governed by Goal 14, Goal 2, ORS 197.732, OAR 660-04-010, the urban reserve rule (OAR 660, div.21), the Metro Code (3.01), and the RUGGOs (Objectives 22 and 24).

Some have suggested that the Executive Officer's recommendation gives too much weight to the protection of agricultural lands. If you walk through the legal framework, however, our analysis shows that in fact, it does not give enough weight to agricultural lands.

The urban reserve rule requires that first, Metro must determine whether lands adjacent to the UGB are suitable for inclusion in the urban reserve based on 5 of the 7 factors in Goal 14, and OAR 660-04-010.

The staff has correctly stated that factors 6 and 7 address agricultural lands. Factor 6 states that agricultural land shall be retained, that is, agricultural land is not suitable for inclusion in the urban reserve if other non-farm land alternatives exist to meet the region's needs. The staff analyzed and rated each *study area* for this factor. However, for those study areas which contain a *mix* of exception areas and exclusive farm use (EFU) land, such an analysis actually waters down the rating the EFU portion would otherwise receive. Goal 14 does not provide for this "dilution" analysis. So, for those study areas with a mix of exception areas and EFU land, the exception areas may well be suitable for inclusion in the urban reserve, but the EFU portion may not. At the very least, if you are considering including a mixed area, the EFU lands should only be included if they are so interspersed with or surrounded by exception areas that development of the area would require them to be included. But, clearly there are mixed URSAs before you where the EFU portion could readily be deleted.

Factor 7 states that you must consider compatibility with nearby agricultural uses. We agree with the staff's analysis that URSAs located where farming is the dominant activity should receive a low, unsuitable rating. This compels a finding that the URSAs made up solely or predominantly of EFU land in Washington County are not suitable for inclusion in the urban reserve. We believe that Goal 14, Goal 2, ORS 197.732, and OAR 660-04-010 (which I will explain below) compels the legal conclusion that as long as there are non-EFU alternatives (which there are) these EFU lands should be eliminated from further consideration, BEFORE you go through the hierarchy of the urban reserve rule and consider things such as a jobs/housing balance.

To digress briefly from Goal 14, we believe this conclusion is supported by Goal 2, ORS 197.732, and OAR 660-04-010, which apply to the designation of urban reserves. These further emphasize the requirement to protect EFU land from inclusion in the urban reserve. They contain similar language and, among other things, require that before EFU land can be found suitable for inclusion in the urban reserve, there must be a showing that existing exception areas and land inside the UGB cannot reasonably accommodate the urban uses. The staff's analysis shows that there are sufficient alternatives inside the UGB and in exception areas to meet the region's urban reserve needs.

And, even if there were not sufficient lands inside the existing UGB and exception areas, these same laws require that EFU parcels be weighed against one another, not just

based on soil type, but also on the adverse impacts urbanization would have on agricultural activities at one site versus another site. (Goal 2, Part II(c)(3); ORS 197.732; OAR 660-04-010(1)(c)(B)(iii).) Again, we believe this would disqualify most, if not all, the EFU parcels in Washington County, even before reaching the urban reserve hierarchy.

Back to Goal 14. We believe that Factor 5 also applies to EFU and forest lands, an analysis which the staff did not do. Factor 5 requires that the environmental, energy, economic, and social consequences of designating land as urban reserves be conducted. The staff did a thorough analysis up to a point: they did *not* analyze the economic impact on the farming and forestry industries of removing lands from the base of these industries. We too often think that the only industries which we need to provide for are inside the UGB. This is a gross oversight, as Clackamas County is the #2 agriculture-producing county in the state, and Washington County is #5.

Factor 5 recognizes this, and requires such an economic analysis. We doubt that this analysis would change what the Executive has recommended, since his proposal includes very little farm land. But, if you stray far from his proposal by including large chunks of farm or forest lands, we believe you may be violating factor 5.

Our last point regarding Goal 14 is a difference of opinion with how the staff conducted its analysis under factor 4. Factor 4 requires that before designating urban reserves or expanding the UGB, there must be a showing that there is a maximum efficiency of land uses *within* and on the fringe of the *existing* urban area. We believe, and case law supports, that this requires a showing that the existing urban land supply is being used efficiently, or will be, before land is designated for urban reserves or the UGB is expanded. However, the staff analyzed how efficiently each URSA could be urbanized. While this is a valuable analysis, we do not believe this is the correct analysis under Factor 4.

To summarize thus far, we believe that the Goals, statutes, administrative rules, and the urban reserve rule are weighted in favor of protecting EFU lands - and to a lesser degree, forest lands - from even being considered suitable for urban reserve designation.

Once you have determined which lands are suitable, application of the urban reserve rule is a further screen to preclude EFU and forest land from designation as urban reserves. While the "specific type of land need" category in the urban reserve rule would allow you to designate farm or forest land ahead of other lands, that can only be justified *if* the need cannot be met on non-EFU and forest land, *and* if it cannot be met inside the existing UGB. OAR 660-21-030 and 660-04-010; Metro Code 3.01.020.

This applies even where the specific need is to correct a jobs/housing imbalance. For example, if Hillsboro has more jobs than housing, the solution is not necessarily to add farm land for residential use to the UGB near Hillsboro. Rather, at least two other steps must be taken first: (1) the subregion must demonstrate that they have taken all steps to ensure that housing commensurate with wage levels for the jobs in that subregion have

been taken, including upzoning, infill and redevelopment strategies, provision for a broad range of housing types such as small lot detached and "granny flats," etc.... (Goal 14, factor 4; Goal 10); (2) an oversupply of employment or industrial land in one area should be cured by transferring that acreage to areas that are housing rich and jobs poor, such as Clackamas County, while rezoning the industrial/employment land for residential use (Metro Code 3.01. 020).

We believe this analysis will result in a conclusion that the EFU parcels now in the study areas in Washington County do not qualify for designation as urban reserves.

Finally, rather than repeat it here, we endorse the position of the Coalition for a Livable Future. The Coalition recommends criteria for designating urban reserves, as well as for how they should be master planned prior to coming into the UGB. We would like to highlight one point of the Coalition's position in particular: we recommend that in *this* urban reserve decision, you establish a binding process for how urban reserves will be master planned prior to coming into the UGB.

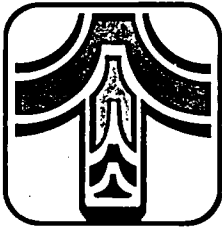
We believe that the Executive Officer's recommendation largely reflects the correct decision on urban reserves, from both a policy and legal perspective. We urge you to stay quite close to that recommendation.

Thank you for consideration of our comments.

Sincerely,

Mary Kyle McCurdy
Staff Attorney

112196-58



CITY OF TUALATIN

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November 21, 1996

Presiding Officer Jon Kvistad and Councilors
Metropolitan Service District
600 NE Grand Avenue
Portland, OR 97232-2736

RE: Urban Reserve Study Areas (URSA)--Listening Post Comments

Dear Presiding Officer Kvistad and Councilors:

This letter reiterates the City of Tualatin's concerns expressed in Mayor Lou Ogden's letter of October 18 and Planning Director Jim Jacks' letters of October 8 and 11 to the Growth Management Committee. The City of Tualatin opposes the designation of URSA 34 (Stafford Area) and 43 (Matrix Development Company site on Grahams Ferry Road) as Urban Reserves and supports the designation of URSA 44 (Tigard Sand and Gravel site).

We understand the Council will use a counterintuitive process to select URs, i.e., all the URSA's are presumed to be URs unless at least four Councilors can be convinced an area should be removed. The City of Tualatin strongly urges you to use a straightforward process that all our citizens can understand. For example, if the decision required by State law is to designate URs, then use a positive process that requires good evidence be presented to support a worthy area being designated as an UR.

The Council's current process uses evidence that supports excluding an area to include it as an UR. For example, some URs are rated poorly as to their UR worthiness, but with the current process they are on the list of areas that should be URs. The process must be changed so only worthy areas will be designated URs.

At this point it is not clear which criteria the Metro Council will use and the weighting for each criterion. We do not support using the Executive Officer's Recommendation as a basis to designate URs because the criteria used are inadequate. For example, the broad approach to not designate Exclusive Farm Use (EFU) areas left the Tigard Sand and Gravel site off the list because it is designated EFU, even though it is an approved sand and gravel extraction site. We recommend the Metro Council listen closely and follow the recommendations of the region's local governments which are based on excellent local knowledge.

The designation of URs must be consistent with the Growth Concept Map, the Regional Urban Growth Goals and Objectives (RUGGOs) and the Urban Growth Management Functional Plan (UGMFP).

The following discusses each of the three URSAs based on thorough local knowledge.

URSA 44, Tigard Sand and Gravel Site (256 ac.).

Please see Tigard Sand and Gravel's letter of September 25, 1996 to Presiding Officer Kvistad from their attorney, Mr. Michael Lilly.

The north 1/3 is Exclusive Farm Use (EFU), the middle 1/3 is AF-20 (Ag. & Forest 20 ac. minimum) and the south 1/3 is AF-20, AF-5 (Ag. & Forest 5 ac. minimum) and MAE (Land Extensive Industrial). The 256 acres should be an UR because they are not farmable and were approved by Washington County for sand and gravel extraction in 1965 (CU 26-65) and 1967 (CU 16-67).

URSA 44 is listed as 162 acres. It should be 256.17 acres based on Tigard Sand and Gravel ownership. Enclosed is a map showing the Assessor's Maps and tax lots.

URSA 43, Matrix Development Company Site (11 ac.).

We oppose designating URSA 43 because such designation would be inconsistent with the limited access road corridor connecting I-5 to Highway 99W at the south end of the City as shown in the Growth Concept Map. URSA designations should not work against the major transportation routes designated in the adopted Growth Concept Map. The road's exact location is not yet determined, thus it is imperative that possible routes be kept clear. The Tualatin Community Plan has designated a corridor in its Transportation Plan since 1979. The limited access road is the only possible solution to removing regional through traffic, especially trucks, on Tualatin-Sherwood Road from our downtown. Our Plan calls for creating a downtown through redevelopment and moving regional transportation onto the Bypass. The Tualatin Commons, a 19 acre mixed use downtown redevelopment project, is almost complete. Our next step is to put the regional transportation onto the designated road.

The City's second concern regarding URSA 43 is retaining community identity through physical separation between Tualatin and its neighboring cities. Tualatin, Wilsonville, Sherwood and West Linn have been careful to retain community identity by emphasizing a physical separation. URSA 43 is inconsistent with the community identity concept as it reduces the separation between Tualatin and Wilsonville.

The third concern is URSA 43 will be physically isolated from the City if the regional transportation corridor is north of URSA 43 because the road is a limited access facility with no crossings (Map 1). Alternatively, if the road is south of URSA 43, it will create landlocked slivers of "no-man's-land" to the east and west (Map 2). Streets inside the UGB are not stubbed to these slivers, so there would be no access to the north, and the limited access road would prevent access to the south.

Lastly, the Executive Officer's analysis shows 62 dwelling units on this site's 6 buildable acres which matches the assumed regionwide density of 10 du/ac. But 10 du/ac makes no sense because there is no bus service and there are no jobs or shopping close by.

URSA 34, Stafford Area (756 ac.).

URSAs 34 (756 ac.) and 33 (338 ac.) which abuts to the north (1,094 total acres) function as one area, especially the transportation system. URSA 34 has an unusual configuration that makes it difficult to discuss. Most of it is east of Tualatin's east City Limits, north of I-205 and south of the Tualatin River. About 1/8 of it, however, is north of the River and abuts Lake Oswego. Logically, the northern 1/8 should be part of URSA 33 as it is north of the River and abuts Lake Oswego. These comments primarily address the area of URSA 34 south of the River and relate to utility costs, poor connectivity, Exception Areas, no potential for bus service, sprawl and community identity.

Some of the comments also apply to the 1/8 of URSA 34 north of the River that abuts URSA 33, especially the transportation concerns. For example, the traffic from URSA 33 will add to and exacerbate the four congested funnels that are the only access points into and out of URSA 34.

The result of breaking URSAs 34 and 33 into two areas and analyzing them separately is the negative factors are diminished and the true picture of both URSAs is distorted.

The Cities of Tualatin, Lake Oswego and West Linn, Clackamas County and the area's neighborhood associations, homeowners associations and property owners have studied the Stafford Area through the Stafford Area Task Force for almost five years. Our studies are accurate and thorough. The Cities and County oppose designating the area as an UR.

The KCM Study shows URSA 34 in the middle category for relative cost of sewer, water and storm drainage. The KCM Study is too general to use the results for site specific UR designations. Granted, financial constraints and time prevented a detailed study, but the data and analysis are simply too general to support designating URSA 34 as an UR. The Study assumes URSA 34's sewage will be pumped upstream approximately 5-7 miles to the Unified Sewerage Agency's Durham Plant. But it is not clear if that is economically possible.

The KCM Study does not address roads because Metro assumes the cost to construct a mile of road is the same everywhere. Clearly, that is not true. For example, roads in flat terrain are much less expensive to construct than in rolling or steep terrain. URSA 34 has rolling terrain that will be very expensive to cut and fill and to construct bridges. For example, Athey Creek originates south of I-205 and runs north to the Tualatin River in the area west of Stafford Road. In the area between Borland Road and the River Athey Creek is in an 80-100 foot deep gorge that will be too costly to bridge with the result that internal connectivity between the

west and east portions of the area west of Stafford Road will not be connected and therefore not be consistent with the UGMFP's connectivity requirements.

The inability to cross Athey Creek will result in no connectivity, except Borland Road, between the areas west and east of Athey Creek. This will force all the traffic onto a single road, Borland Road, which is the absolute opposite of the kind of connectivity the Region 2040 Program calls for.

Connectivity from an URSA to the region is critical to ensuring each UR will work. Compliance with the State Transportation Planning Rule and Title 6 (UGMFP) must be attained. URSA 34 is an island with only four access points. Potential connections are walled-off by the Tualatin River to the north, I-205 to the south and the existing single family subdivisions of Tualatin and West Linn to the west and east, respectively.

URSA 34's only connection to the north is Stafford Road's narrow two-lane Shipley Bridge over the River. It is a funnel. Widening will be extremely costly, and even if lanes are added, it will still be the only road crossing the River and will continue to be a congested funnel. This is not the kind of connectivity to the rest of the region the Region 2040 Program requires.

No additional bridges across the River will be built as they will be cost prohibitive. The floodplain is wide, residences near the River would have to be displaced and riparian vegetation and habitat would be destroyed. If a new road and bridge is built, where would it go? It could only go north to connect to Childs Road which is perched on a very steep hillside. Childs Road would have to be widened to accommodate additional traffic, intersections and turning lanes. Slope easements would take up many acres. The potential for slides would be unacceptably high. Due to the exceptionally rugged terrain, the cost to widen Childs Road would be exorbitant, and when tied to the high cost to construct one or more new bridges across the River, no new connectivity would occur. Title 6 will not be met if URSA 34 is designated as an UR.

There is only one access into Tualatin, Borland Road. Widening it over Saum Creek and obtaining additional right-of-way through established single family neighborhoods and in front of Bridgeport Elementary School would be costly. Neighborhood livability would be decreased merely to funnel more traffic through an existing congested constriction. No other access to the west is possible because built-out subdivisions and Saum Creek block any possible connections. Crossing Saum Creek and its floodplain and wetlands would be costly. Building a new road along the south bank of the River in the floodplain and Greenway is not possible as an expensive crossing of Saum Creek would be necessary and it would destroy the designated greenway, riparian vegetation and bikepath.

There is only one access into West Linn, Borland Road. It leaves URSA 34 going easterly through rural Clackamas County before reaching West Linn where it crosses the River. Widening it to 3, 4 or 5 lanes outside the UGB and outside UR 34 to serve urban traffic

is problematic. A costly bridge widening over the River and its floodplains, wetlands and riparian vegetation would be needed. Once in West Linn the widening would be through established single family neighborhoods which would not increase connectivity. Neighborhood livability would be decreased merely to funnel more traffic through an existing congested constriction.

There is only one access to the south, the I-205 interchange at Stafford Road. No additional interchanges, overpasses or underpasses will be built. No new connectivity to the south is possible. Access will be funneled into one constricted point. I-205 is already overly congested in the morning and evening. The usual speed is about 10 - 20 miles per hour from I-5 to the Oregon City area. Even though it is a freeway, I-205 is not now, and will not in the future be a viable route for trips generated in URSA 34. Note also that if URSA 33 becomes an UR, its traffic will add to the congestion at the Stafford Road Interchange and on I-205.

URs should be designated based on the Regional Transportation Plan (RTP) with its "financially constrained" assumptions. The Growth Concept Map, RUGGOs and especially the UGMFP recognize the financial constraints of the RTP. The most significant road improvement in URSA 34 in the financially constrained RTP is a signal at the Stafford Road/Borland Road intersection. The RTP cannot support URSA becoming an UR.

URSA 34 is far from existing bus service. The area would be primarily single family residences, although Metro staff says URs will have apartments and jobs too. Overall, density would be at the low end of the region's 2040 density scale, so the possibility and probability of future bus service is very low. The entire 2040 Plan is predicated on increased bus service for the journey to and from work. URSA 34 should not be an UR because its potential and probability for bus service is very low.

Tualatin, Lake Oswego and West Linn have supported the Community Identity Concept in the Growth Concept Map and RUGGOs. Tualatin wants space between Tualatin and our neighbors to the east. Urbanizing URSA 34 would defeat the Community Identity Concept and would not be consistent with the RUGGO's and the Growth Concept Map.

The result of URSA 34 becoming an UR is sprawl. The Executive Officer's recently proposed Master Planning process talks of including local shopping and possibly some jobs (office and presumably "high tech" industrial) in URs. So, the future of URSA 34 is a Town Center, or at a minimum a Mainstreet, of several thousand people with a shopping center and office and "high tech" jobs. The Growth Concept Map does not designate a Town Center or Mainstreet in the Stafford Road/Wankers Corner Area, thus designating URSA as an UR is not consistent with the Growth Concept Map.

The Tualatin City Council does not support a Town Center or Mainstreet in URSA 34. If URSA is urbanized, there won't be a "there" there. It would, presumably, be in Tualatin's City Limits, but the residents and workers will not identify with Tualatin as

"their City" and The Lake of the Commons as the heart of their downtown.

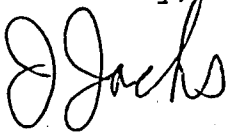
The jobs/housing balance should be part of the analysis supporting the decision to designate an UR. The majority of URSA 34 will be single family dwellings which means the residents will have to travel to jobs. The shopping center and limited office and industrial jobs will not be enough for the residents. So, designating URSA 34 an UR will force more trips over more miles and be counter to what the Region 2040 Program is trying to accomplish. Tualatin is a Town Center with a significant number of retail, office and industrial jobs. Tualatin itself is jobs rich, but Sherwood, the south end of Tigard, King City, Durham, Lake Oswego and West Linn are housing rich. So, Tualatin and its neighboring communities provide a jobs/housing balance in the south Metro area.

The Executive Officer's general analysis overweighted URSA 34 being a Clackamas County Exception Area. Although URSA 34 is an Exception Area, agriculture exists in the area. The plant nursery (N of Borland, W of 35th, S of Halcyon Rd.) is a worthwhile contributor to the State's nursery production which is one of the State's leading agricultural exports. It does not make sense to urbanize agricultural land that supports a nursery. Abutting the nursery and extending easterly, are 40 acre parcels supporting agriculture and tree farms. The result of the Region 2040 Program should not be the urbanization of agricultural soils supporting nurseries, agriculture and tree farms.

In summary, the City of Tualatin strongly urges the Council to start with no areas assumed to be URs, to make it clear what the criteria are to be used by the Council is designating URs and to listen carefully to the local jurisdictions.

Thank you for the opportunity to comment.

Cordially,



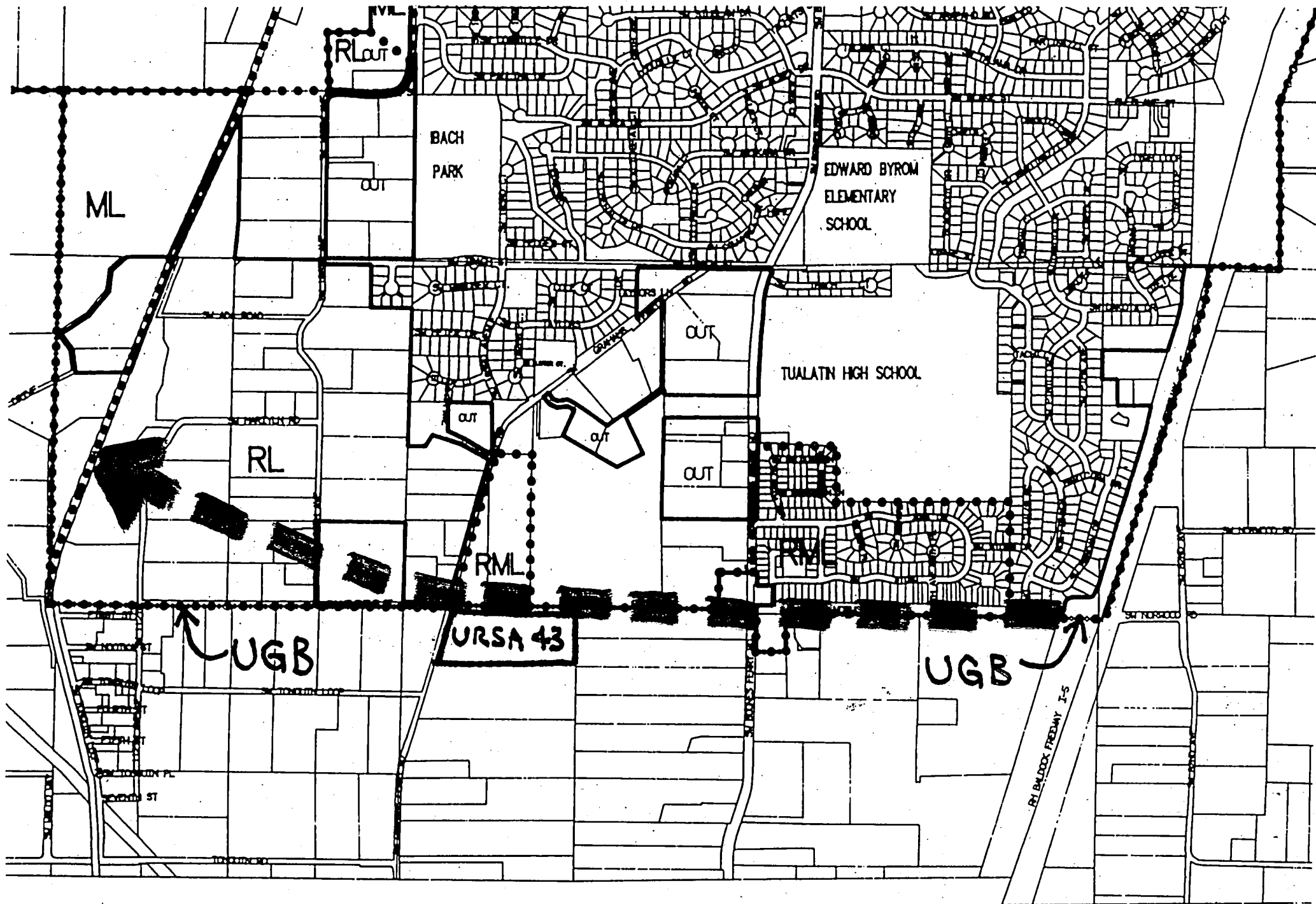
James F. Jacks, AICP
Planning Director

enclosures

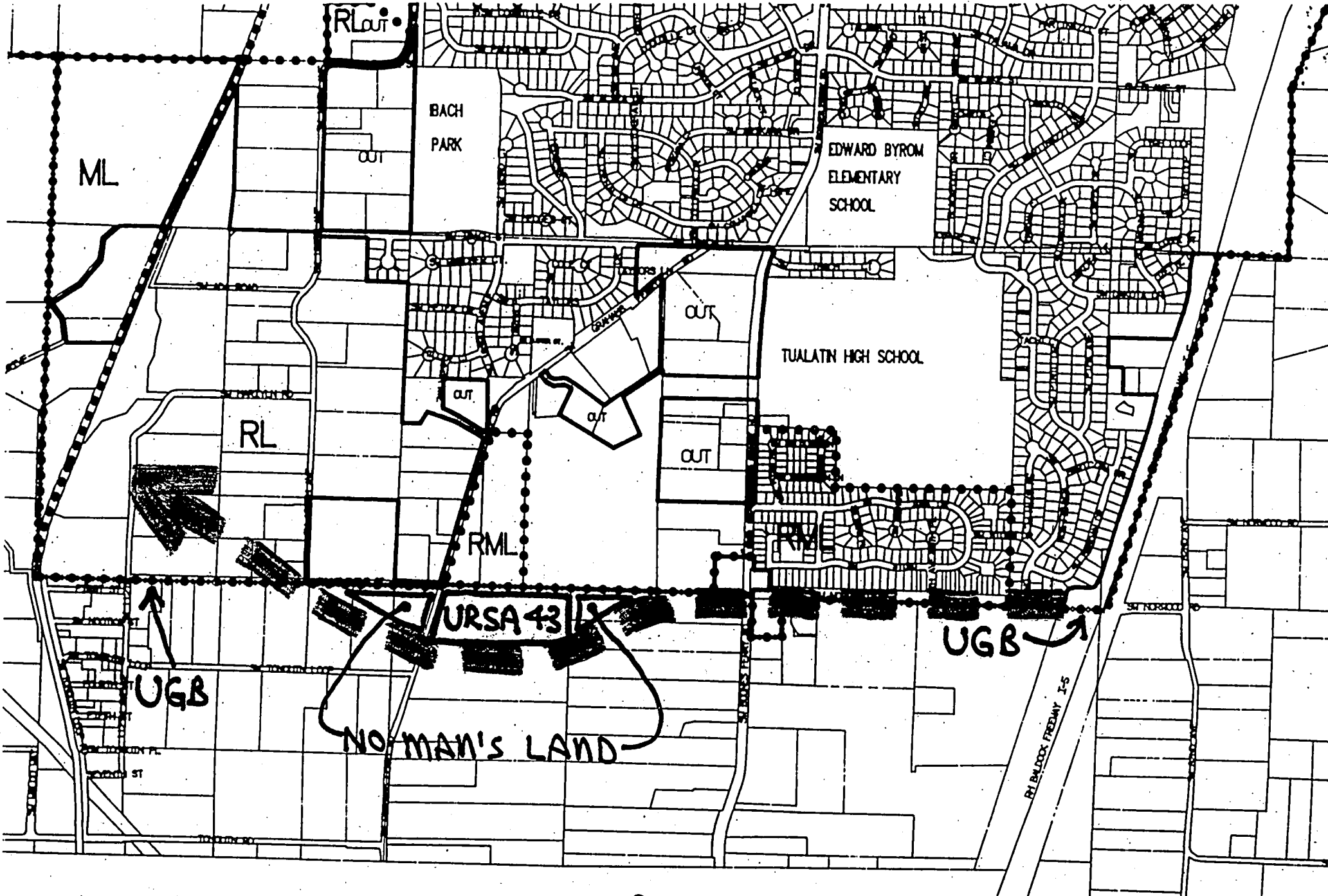
c: Mayor and Tualatin City Council
Tualatin City Manager
Tualatin Dept. Managers (BB, PH, JY, McK)
Interested Parties

file: Regional Agencies, Metro, Urban Reserve Study Areas

wp51\wpdocs\Metr2040\1996\UR11-21.1tr



Map 1



Map 2



112196-59

380 "A" AVENUE
POST OFFICE BOX 369
LAKE OSWEGO,
OREGON 97034
(503) 635-0213
FAX (503) 697-6594

November 21, 1996

ALICE L. SCHLENKER,
MAYOR

The Honorable
Jon Kvistad Presiding Officer
Metro
600 NE Grand Avenue
Portland OR 97232-2736

CHARLES C. (MIKE) ANDERSON,
COUNCILOR

BILL ATHERTON,
COUNCILOR

HEATHER CHRISMAN,
COUNCILOR

BILL KLAMMER,
COUNCILOR

CRAIG PROSSER,
COUNCILOR

MARY PUSKAS,
COUNCILOR

Dear Chair Kvistad and Metro Councilors:

On behalf of the City of Lake Oswego, we wish to reassure you of our sincere interest in seeing that our 2040 Concept for Urban Growth Management is successful.

Since I will be unable to attend today's meeting, I want to convey in this letter the City's belief that:

1. Our task as a local government is to preserve the livability and sustainability of our city.
2. We have had several years experience in providing services with significant growth throughout our city.
3. We have been able to secure funding for services and have assisted our school district since 1990 after the passage of Ballot Measure 5.
4. With the passage of Ballot Measure 47 ("Cut and Cap"), we find our challenge to meet voter expectations to reduce government even more extensive and challenging. No, this suggestion to consider the consequences of the passage of Ballot Measure 47 is not an excuse -- it is a reality.

It is for this reason the Cities of Lake Oswego, Tualatin, and West Linn, and Clackamas County all agree that additional pressure and responsibility to add urban reserves beyond our recommended acreage is even more daunting than we once thought.

There are no criteria that support a cost-effective solution in the Stafford area. The transportation and jobs/housing mix along with other criteria ratings, leave our Stafford area far down on your list. Criteria which rank the Stafford Urban Reserves Area high, such as distance to schools that are at capacity and a road network that doesn't consider topography and physical barriers, are misleading.

Lake Oswego is in complete agreement with the MPAC recommendations provided to you in November, 1996. While we recognize these recommendations are advisory only, they do represent a majority of local jurisdictions which will be responsible for eventual conversion of urban reserves to vital urban areas.

Thank you for giving this your most thoughtful deliberation.

Sincerely,

A handwritten signature in cursive script, reading "Alice L. Schlenker", followed by a long horizontal flourish line.

Alice L. Schlenker
Mayor

ALS/sms

City of

WILSONVILLE
in OREGON



11/2/96-60
30000 SW Town Center Loop E
Wilsonville, Oregon 97070
(503) 682-1011
(503) 682-1015 Fax
(503) 682-0843 TDD

November 20, 1996

Jon Kvistad, Presiding Officer
Metro Council
600 N.E. Grand Ave.
Portland, OR 97232-2736

Dear Mr. Kvistad and members of the Council:

This letter is being submitted by the City of Wilsonville as you make your decisions on the proposed Urban Reserves. There are three areas that we strongly urge you to designate as Urban Reserves:

1. A 4.75-acre portion of the Tax Lot that adjoins the existing City shops, on the North side of Elligsen Road. It has City limits on two sides, a fully improved RV park on a third side and has slopes that average approximately 10%;
2. The 20-acre school site on Division of State Lands (DSL) Wilsonville Tract; and
3. Properties in the Dammasch Planning Area.

The Elligsen Road property (a portion of area 35). The first area is intended only to allow for the future expansion of our existing City shop facilities. As you know, Wilsonville has its own growing transit system (South Metro Area Rapid Transit - SMART) for which we will need additional facilities as the City, and the transit system that serves the City, continue to grow.

The School Site (area 39). The 20-acre site on the Wilsonville Tract is held in trust for the State's Common School Fund by DSL and is available at no cost to the West Linn-Wilsonville School District. The District intends to build two schools on this site in the future and will need full urban services from the City. The remainder of the Wilsonville Tract is still slated for acquisition by Metro as part of the regional greenspaces program, and should not be included in the Urban Reserves.

The Dammasch Planning Area (a portion of area 41). This area is much larger and is of much greater significance to the region. It includes all of the land within the Dammasch planning area that is not already within the city limits. After conducting three informational public meetings since June, and a public hearing on November 13, the Wilsonville Planning Commission and City Council voted unanimously to accept



"Serving The Community With Pride"

City of

WILSONVILLE
in OREGON



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Wilsonville, Oregon 97070
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"Serving The Community With Pride"

the Master Plan for the Dammasch area that has been in the works for approximately 18 months. Please note that Metro joined the City of Wilsonville and five State agencies in the preparation of the Dammasch Area Transportation-Efficient Land Use Plan. Funding for the Plan was provided by a State Transportation-Growth Management (TGM) Grant and the City of Wilsonville.

In fact, the Dammasch area planning effort marks the first master plan to be prepared for an Urban Reserve area -- something Metro would like to see done for any land before it undergoes conversion to urban use. Both Executive Officer Burton and Governor Kitzhaber have lauded this planning effort over the last year.

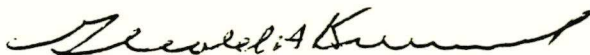
The Plan embodies Metro's 2040 planning principles in a way that will provide affordable housing units within walking distance of Wilsonville's significant job base. Please note that the planned addition of some 2,300 housing units, of a wide variety of types, sizes, prices and rent levels, will help to address the local imbalance of jobs to housing units in Wilsonville.

We realize that a portion of the property we are talking about is in agricultural use. Quite frankly, we wish that this were not the case. Unfortunately, it is the only way to make the Dammasch Area Master Plan work. The old Dammasch State hospital sits on a peninsula of land that has a mixture of rural-residential and agricultural zoning on three sides. The EFU property that is just west of the old hospital buildings, and part of the State's ownership in the area, is completely surrounded by rural-residential zoning.

The EFU property that is east of the hospital site is surrounded on three sides by non-resource zoning. Much of this latter area is actually within the Coffee Lake floodplain and is proposed to be retained as open space in the Dammasch Area Master Plan.

It is absolutely critical to the success of the master planning process that all of the Dammasch planning area be included in the Urban Reserves! Without its inclusion, there is no way to provide the necessary infrastructure to implement the master plan. If that happens, the region will be without the model urban village that we have worked so hard to create on the old Dammasch State Hospital site.

Very truly yours,



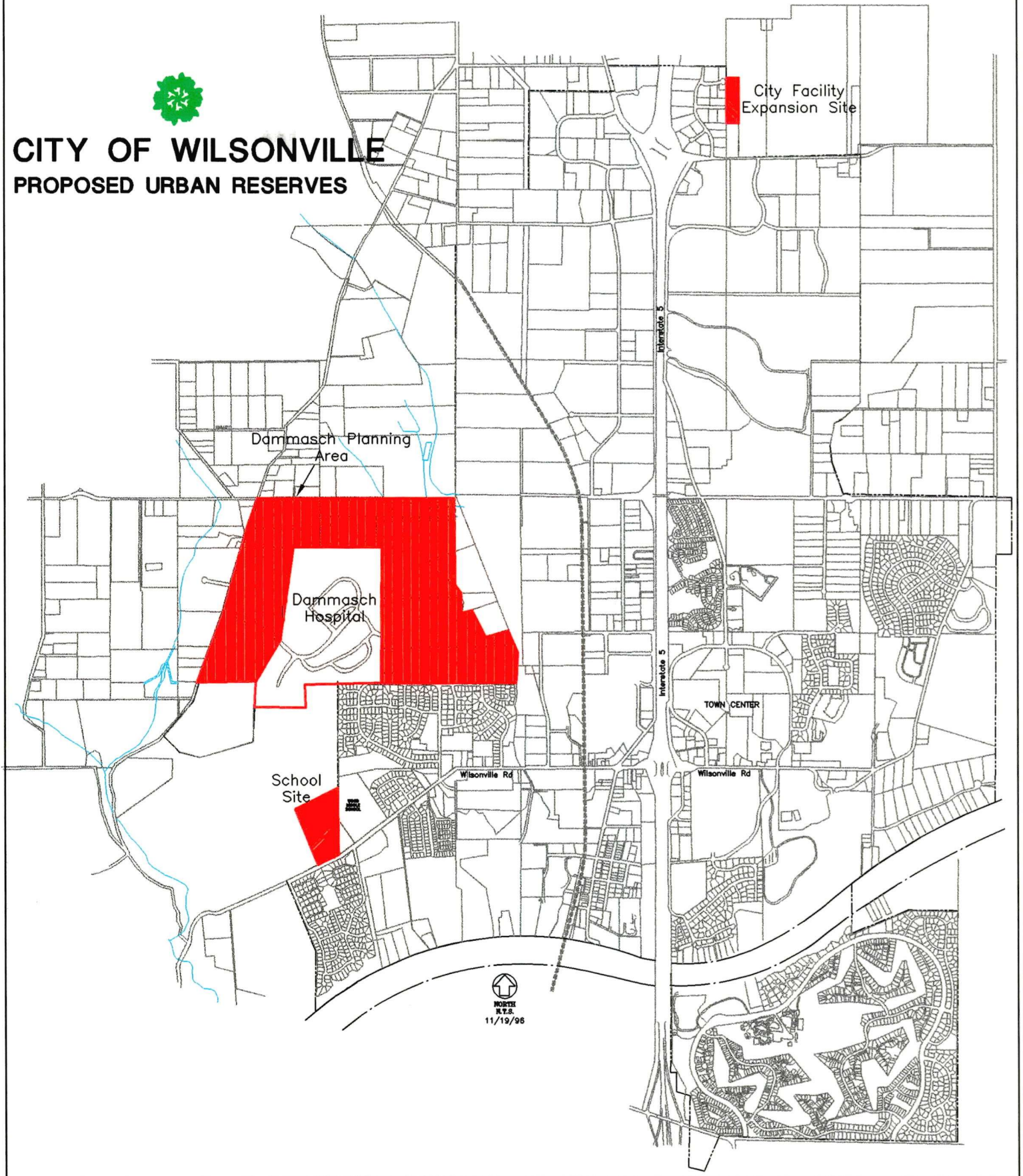
Gerald A. Krummel
Mayor

al:lb



CITY OF WILSONVILLE

PROPOSED URBAN RESERVES



URBAN RESERVE DESIGNATION DECISION RECORD

RECORD NUMBER: 112196-60

DESCRIPTION OF RECORD

PLACEHOLDER: Map, Dammasch Plan

RESOLUTION NO. 1332

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WILSONVILLE ACCEPTING THE DAMMASCH AREA TRANSPORTATION-EFFICIENT LAND USE PLAN IN CONCEPT AND DIRECTING THAT THE NECESSARY STEPS BE TAKEN TO IMPLEMENT THE PLAN.

WHEREAS, the Planning Commission and City Council have long been interested in the use and development of the former Dammasch State Hospital and surrounding properties; and

WHEREAS, the City entered into a Memorandum of Understanding (MOU) with Metro and five different State agencies concerning efforts to plan the area; and

WHEREAS, the City applied for and received a \$70,000 grant from the State's Transportation-Growth Management (TGM) program for the purpose of preparing a Transportation-Efficient Land Use Plan (Master Plan) for the area; and

WHEREAS, the City contributed \$50,000 of its own funds, plus significant in-kind services in the form of staff support, to this Master Plan; and

WHEREAS, the consulting team of David Evans & Associates, Leland Consulting Group, Fletcher/Farr/Ayotte, and Jeanne Lawson Associates was selected to prepare the Master Plan; and

WHEREAS, the consulting team conducted public meetings at the former Dammasch State Hospital on the evenings of June 18, October 17, and October 23, 1996, for the purpose of involving the public in the planning process; and

WHEREAS, the Draft Master Plan, based on the public meetings noted above, was considered by the Planning Commission and City Council at a joint public hearing conducted, after proper public notice, on November 13, 1996, in the City Council Chambers of the City Annex Building; and

WHEREAS, the City Council has found, after considering all relevant public testimony presented on the subject, that the implementation of the Dammasch Area Transportation-Efficient Land Use Plan will assist the City, Clackamas County, Metro and the State in achieving the Statewide Planning Goals and the Regional Urban Growth Goals and Objectives.

NOW, THEREFORE THE CITY OF WILSONVILLE RESOLVES AS FOLLOWS:

That the concept of the Dammasch Area Transportation-Efficient Land Use Plan is hereby accepted, and it will be used to:

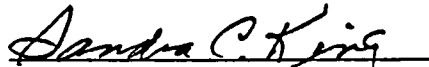
1. Convey a commitment about the development of the Dammasch area to the State's Correctional Facility Siting Authority and the Governor.
2. Convey the message to Metro that the unincorporated parts of the planning area must be included within the region's Urban Reserves, and should be considered among the first areas of Urban Growth Boundary expansion.
3. Direct the staff to work with Clackamas County, Metro, and the Boundary Commission in preparing the necessary intergovernmental agreements for the project to go forward.
4. Initiate, and direct the City staff to prepare amendments to the City's Comprehensive Plan and zoning for the area in conjunction with the steps noted above.

ADOPTED by the City Council of the City of Wilsonville at a special meeting thereof this 13th day of November, 1996, and filed with the City Recorder this date.



GERALD A. KRUMMEL, Mayor

ATTEST:


Sandra King, City Recorder

SUMMARY of Votes:

Mayor Krummel	Yes
Councilor Lehan	Yes
Councilor MacDonald	Yes
Councilor Hawkins	Yes



Lake Oswego School District

Office of the Superintendent
2455 S.W. Country Club Road
P.O. Box 70
Lake Oswego, Oregon 97034-0070
(503) 636-7691

112196-61
RECEIVED
NOV 20 1996
CITY OF LAKE OSWEGO
Dept. of Planning & Development

November 18, 1996

Chair Kivistad and Metro Council:

The Lake Oswego School District has reviewed the information provided by Metro staff regarding the potential Urban Reserve designation of land in the Stafford area south of Lake Oswego. Portions of Urban Reserve Study Areas (URSA's) 31, 32, 33, and 34 are within the boundary of the Lake Oswego School District. We are advised that, within these four URSA's, there are 337 buildable acres inside the district's boundary, and that if these areas are developed within the Urban Growth Boundary, they would be expected to achieve an average density of 10 units per acre.

Based on these assumptions, some 3,370 dwelling units would be developed. Using Metro's 2015 Housing Needs Report, Lake Oswego is expected to have 72.6% single family and 27.4% multiple family units. Applying those percentages to the 3,370 units translates to 2,445 SF and 924 MF. The projected enrollments would require the Lake Oswego School District to construct three new elementary schools and to substantially expand the four existing secondary schools. The Lake Oswego School District does not have the financial resources to undertake such capital construction let alone to finance the operation and maintenance of these additional facilities.

The School District is working closely with the City of Lake Oswego to ensure that we can serve the additional population that is expected to locate within the city and its current Urban Service Boundary. Given our limited resources and the future limitations presented by Measure 47, providing quality educational services to an expanded population inside the current Urban Growth Boundary will be a significant challenge in itself. Therefore, the Lake Oswego School District strongly opposes designation of URSA's 31, 32, 33, and 34 as Urban Reserve.

William A. Korach

William A. Korach, Ed.D.
Superintendent

Chris Schetky

Chris Schetky, Chair
Lake Oswego School Board

11/2/96-62

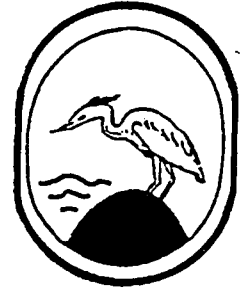
BIRDSHILL

November 21, 1996

From: Birdshill Citizen Planning Organization

To: Metro Council

Issue: Inclusion of the North Stafford Area on the
Urban Reserve List



C. P. O.

Dear Council,

The Birdshill C.P.O. would like to weigh in opposing the inclusion of the North Stafford Area on the Urban Reserve list. The Executive Officer's Recommendations - Urban Reserves study commissioned by the council reveals several inherent reasons why this area should be excluded.

(1) Based on the figures in the study, specifically of those areas under consideration, only a half of the acreage is buildable, therefore the topographic layout of the land is not conducive to high density development. It therefore seems logical that development of this area would not be compatible with the mandate of maximum efficiency of land use.

(2) The economic benefits of the development would not warrant the cost of providing services. Presently there is not sewer and water services adequate to service a development of this scope and size.

(3) If the objective is to reduce traffic congestion in the Metro area development of this area would not accomplish the goal. In fact the distance between employment and residential housing, in these areas, are great and would exacerbate an already overcrowded system of arterial. Likewise the existing roads in the North Stafford area are incompatible with major development.

(4) Homes in this area would be upper income dwellings which tend to be larger and represent low density. Therefore development of this area would not be consistent with the desire to restrict growth by increasing density.

Conclusion:

Whereas the surrounding municipalities oppose the inclusion of the North Stafford area in the Urban Reserve and the topographic, economic, and transportation challenges are formidable the Birdshill Citizens Planning Organization believes that the North Stafford area should be excluded from the Urban Reserve list.

Sincerely Yours

A handwritten signature in dark ink, appearing to read 'Eric Lowe', is written over the 'Sincerely Yours' text.

Eric Lowe (Birdshill C.P.O. President)



DEPARTMENT OF PLANNING AND DEVELOPMENT

November 21, 1996

Chair Kvistad and Council,

Master planning of urban reserve areas prior to including them inside the Urban Growth Boundary has been presented as the way to ensure that future development will be consistent with the 2040 Plan and to ensure that adequate public facilities will be available. The preparation of master plans has even been cited as a way to solve the fiscal limitations that will be imposed on local government by Measure 47.

The Rosemont Property Owner's Association has prepared a Master Plan with the assistance of a consulting firm for 765 acres that include all of URSA 31 and portions of URSA 32 and URSA 33. This plan was submitted to the Growth Management Committee as evidence that these areas can be easily serviced and should be designated Urban Reserve. The Plan is part of the record in these proceedings.

The City of Lake Oswego has reviewed the Rosemont Master Plan and offers the following analysis to demonstrate that the Plan, in fact, provides significant evidence to support of the City's position that the North Stafford Urban Reserve Study Areas should not be designated as Urban Reserves.

TRANSPORTATION

The Master Plan identifies a number of intersection improvements that are already needed in the area including Stafford at Rosemont, Childs, and Borland and notes that the Stafford and Borland intersection is scheduled by Clackamas County for improvement in 1999. The Plan makes no mention of the improvements at Stafford and Overlook that are also needed now. Other intersection improvements are listed that will be needed to directly serve this development including Stafford and Bergis and Stafford and Johnson. The Plan makes no mention of the impacts of the development on intersections within Lake Oswego or West Linn and does not discuss the need to widen Childs, Stafford, and Rosemont to urban standards, nor does it consider the likelihood that the Tualatin River bridge would have to be widened. The I-205/Stafford interchange is noted under Findings and Recommendations with the statement that: "Because of the lack of existing turning movements for the traffic on Stafford Road at the I-205 freeway, it is very difficult to determine with some degree of accuracy the anticipated improvements."

Having identified the existing transportation system deficiencies and some of the improvements that will be needed, the Plan offers no indication of how these improvements will be financed and fails to address the impacts of this development on adjacent communities that are struggling to find financing for existing traffic problems. The only financing strategy offered is the mention of the Clackamas County plan to improve the intersection at Stafford and Borland Roads. The 1996-2001 Comprehensive Clackamas County Transportation Strategy lists the Stafford/Borland intersection improvement to include right-of-way, realignment, left turn lanes and traffic signal at a total cost of \$990,000 and committed funds of \$500,000. The right-of-way portion of the project costs \$500,000. The Stafford/Rosemont intersection is also listed in 1999 at a cost of \$500,000 but no funds are committed.

The County's adopted Transportation Strategy for 1996-2001 has 34 capacity improvement projects estimated to cost \$88,562,000. The County currently has \$51,892,000 committed to these projects leaving a \$36,670,000 shortfall. The City of Lake Oswego's adopted Capital Improvement Plan for 1996-2001 does not include any transportation improvements outside its current Urban Services Boundary.

UTILITY FEASIBILITY

Sewer Service

The Rosemont Master Plan outlines several alternatives for providing sewer service to the Rosemont properties.

Alternative A relies on an expansion of the Tryon Creek Treatment Plant. The Kellogg, Oak Lodge, Tryon Creek, and Tri-Cities (KOLTT) sewer service study has recommended that the Tryon Creek Treatment Plant not be expanded and the cities of Lake Oswego and Portland are developing alternative strategies that would divert flows to other treatment plants.

Alternative B relies on the diversion of flows to the Durham Treatment Plant which is operating at 90% capacity and the Plan indicates that the development will add the equivalent of 4.5% of capacity. The Plan does not consider the additional demand that will be placed on the existing plant by development within the existing Urban Service Boundaries of the cities it serves such as the Kruse Way area of Lake Oswego. The Unified Sewerage Agency (USA) indicates that the plant will require expansion within the next 3 to 5 years. The Plan points out that this alternative will "... involve additional lift stations and, most likely, upsizing of existing lines to the treatment plant." The Plan also states that: "Costs associated with increasing the capacity for the lines and at the plant are not included here."

Alternative C relies on the construction of a sewer line into the Tanner Basin and connection with the West Linn sewer system which pumps its sewage to the Tri-City Treatment Plant which has capacity. The costs for the sewer lines and pump stations are not provided in the Plan for this alternative.

Alternative D is the construction of a new regional treatment plant near the Tualatin River. This alternative is not very feasible given the high up front capital costs per dwelling unit.

Water Service

The Plan states that: "... a new water storage system will be required to serve this area." and that water can be purchased through agreements with the existing treatment plants operated by Lake Oswego or West Linn." The Plan also lists the Skylands Water District as a possible source of water. The Plan indicates that the development will require 1-2 MG storage volume.

Lake Oswego water planning criteria would require 5 MG for the proposed development. Lake Oswego does not have any excess capacity during peak summer demand. The Skylands Water District is served by only one well and a .25 MG reservoir and cannot meet its own peak demand without purchasing water from Lake Oswego. Properties within the proposed development above 560 feet would have to be served by continuous pumping or an above ground reservoir. West Linn does not have existing transmission piping adjacent to the Rosemont properties. Using the design criteria in the KCM analysis, an estimated 3,000 feet of 20 inch diameter pipe, at a cost of \$300,000 would be required to bring West Linn water to the development.

As in the case of the sewer service analysis, no cost estimates are provided as part of the water service analysis,

Stormwater Service

The Plan proposes to use an existing pond and a regional water quality facility for stormwater storage and treatment. Exhibit C of the Plan shows a regional facility of approximately 18 acres. The Lake Oswego Surface Water Management Master Plan prepared by OTAK cites a national standard for regional water quality facilities that would require a 27 acre facility for the 756 acre development. Tualatin River Basin Rules, established by DEQ, may require on-site water quality facilities which would increase the costs of stormwater services per unit. No cost estimates are provided in the Stormwater Service analysis section of the Plan.

Conclusion

The Utility Feasibility portion of the Plan concludes by stating: "This designated area can be serviced by water, sanitary sewer, and storm sewer systems to accommodate this planned community." It further concludes that: "A more in-depth evaluation and analysis is required to identify, firstly, all the design and political considerations and then, secondly, the cost implications."

COST OF SERVICES

Despite the conclusion referenced above that more in-depth evaluation and analysis is required to identify the cost implications, the Plan's Summary of Findings states that: "Water and stormwater management costs to the proposed area are at \$461 per dwelling unit." The KCM study found that the costs of water and surface water for URSA 31 was

\$1,400 and \$370 respectively for a combined cost of \$1,770, almost four times the costs "found" by the Master Plan for the Rosemont Properties. The current City SDC for a water connection alone is \$1,688.

Furthermore, there is reason to question the validity of the KCM estimates which rely on historical cost data. Many local governments are experiencing significant increases in the costs of constructing public facilities due to the amount of development in the Metro area. For example, the KCM report assumes a cost of \$0.50 per gallon for the construction of reservoirs. Lake Oswego is currently constructing a water reservoir at a cost of \$0.66 per gallon.

The Findings also indicates that: "Utilizing two of the available alternatives would place full service sanitary service to the proposed area at \$1,030 per dwelling unit." The KCM study found that the costs of sewer for URSA 31 was \$2,900 per dwelling unit, almost three times the costs "found" by the Master Plan. The current USA systems development charge for a sewer connection alone is \$2,200.

The Findings do not include any cost estimates for the off-site transportation improvements that the Plan's analysis indicates would be needed, or for the other off-site improvements that it does not identify but which would be needed to serve the Planned Community and its "Village Center." The Findings state that: "A proposed Village Center would become a transportation hub for this portion of the metro region serving any potential development, but, as importantly, serving existing transportation needs. It would thereby help to support Region 2040 transportation goals and objectives." It is difficult to determine from the contents of this Master Plan how an existing deficient transportation system would be transformed into a "transportation hub" that would implement 2040 when this Plan indicates no commitment to the financing of needed transportation improvements.

SCHOOLS

Schools are an important component of a community's quality of life and their services are expensive to provide. The Plan does not discuss the capacity of existing schools to serve the proposed development nor does it indicate whether additional school facilities would have to be constructed and staffed to serve the additional population. The Plan does identify an eight acre site, presumably for an elementary school, but there is no discussion of how much such a facility would cost, how it would be financed, or whether the site would be dedicated to the school district.

Analysis of the Stafford URSA's by the Lake Oswego School District for the net buildable acres within the boundary of the District determined that for 3,370 dwelling units, the projected enrollments would require three new elementary schools and substantial expansion of four secondary schools. The 2,945 dwelling units projected by the Plan would likely require approximately 15% less capacity which would mean that at least two elementary schools would have to be constructed and at least three secondary schools would have to be expanded.

The issues of constructing additional school facilities and financing them is further complicated in URSA 31 by the fact that the area encompassed by the Plan is within two different school districts. The northerly 1/3 is in the Lake Oswego School District and the southerly 2/3 is in the West Linn-Wilsonville School District. The allocation of 8 acres for a school site in the Master Plan does not adequately address the issues of capacity, the need for new facilities and their impacts on two different school districts.

SUMMARY

The Rosemont Property Owners Association has submitted a "Feasibility Analysis" that has been represented as a Master Plan for a planned community of 2,945 dwelling units and commercial Village Center. The stated purpose of this document is to: "... develop land use development scenarios, infrastructure requirements, traffic impacts and costs of a selected scenario, and to determine existing capacities and necessary improvements to accommodate potential development."

The City's analysis of this proposal as presented above indicates that this document does not achieve its stated purpose and is at best a limited feasibility analysis. It should not be accepted as a master plan since it does not provide complete and accurate information regarding existing public facility deficiencies, needed facility improvements, and a feasible financial plan for funding those improvements.

The above analysis also supports the position the City of Lake Oswego has taken regarding the urbanization of the North Stafford Area. It is an area that is not cost effective to serve. The development of 3,000 dwelling units and a 12 acre shopping center by the Rosemont Property Owners will not support the implementation of the Regional Urban Growth Goals and Objectives and the 2040 Plan because the residents of this planned community will have to drive somewhere else to work on an already inadequate road network that will become more congested in the absence of identified funding for improvement.

Finally, this master planning exercise illustrates the complexity of the undertaking and the need for direct involvement by local government staff and advisory bodies if master plans are to provide the level of information and predictability necessary to ensure that future urbanization is consistent with the 2040 Plan. Such a process will require the commitment of considerable time and resources by local government at a time when those resources are being further limited.

Respectfully yours,



Tom Coffee
Assistant City Manager